Corporate Contributions

Political contributions to U.S. federal election campaigns made from Thermo Fisher Scientific Inc. (“Thermo Fisher” or the “Company”) funds are prohibited.

The legality of political contributions to state, local or foreign campaigns or causes must be determined on a jurisdiction-by-jurisdiction basis and, therefore, must be approved in advance by a member of the Company’s legal department. Political contributions include any donation, gift, or loan of Company funds, assets, or property to or for the benefit of any political party, political committee, or candidate committee, and any use of Company funds, assets, or property to oppose or to support any candidate. This includes: (a) donations, gifts, or loans of funds, assets or property which are made by employees or third persons, such as agents, or consultants, who are reimbursed in any way by the Company; (b) the uncompensated use of Company services, facilities, or property; and (c) loans, loan guarantees or other extensions of credit.

The Thermo Fisher Scientific Political Action Committee (“PAC”)

In accordance with federal law, a corporation may solicit from eligible employees voluntary contributions to its federally registered political action committee (PAC) and use those contributions for political purposes. The Thermo Fisher PAC supports candidates without regard to political affiliation but based on their views on issues relevant to the Company and its mission, committee assignments and the presence of Thermo Fisher employees in their jurisdictions.

Contributions to candidates are approved by the Company’s Senior Director, Global Government Relations & Public Affairs, the General Counsel, and the Vice President, Corporate Communications. The PAC operates in accordance with Federal Election Commission (FEC) rules and regulations.

Trade/Industry Associations

The Company belongs to and pays membership dues to certain U.S. and global trade and industry associations. The Company’s policy is that each such association may use no more than $25,000 of the Company’s dues in any calendar year for any donation, gift, or loan made to or for the benefit of any political party, political committee, or candidate committee, or to oppose or support any candidate, and the Company communicates this policy to the associations of which it is a member.

Annual Report

No later than the date of its annual meeting of shareholders in the succeeding year, the Company will provide an annual report on its website which will include Company donations, gifts, or loans of Company funds, assets, or property to or for the benefit of any political party, political committee, or candidate committee, or uses of Company funds, assets, or property, to oppose or
support any candidate or influence the general public or any segment thereof, with respect to any ballot referendum made in the previous calendar year if any, or a statement that no such contributions were made, if applicable. This disclosure will include contributions to committees organized pursuant to 26 U.S.C. § 527. Further, with respect to those trade associations to which it has made annual aggregate payments of more than $25,000 in the previous calendar year, the Company will disclose the portion of its dues and special assessments that were used for activities that are not deductible under section 162(e) of the Internal Revenue Code as reported to the Company by the trade associations. In addition, the Company will report any designated contribution to organizations established pursuant to 26 U.S.C. § 501(c)(4) for the specific purpose of funding political activity that is nondeductible under section 162(e)(1)(B) of the Internal Revenue Code.

All PAC contributions related to federal elections are publicly disclosed and available on the website of the Federal Election Commission at www.fec.gov.