



CORPORATE POLICY # 802

Title: U.S. Election Contributions

Version: 1

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Sponsoring Division: Policy, External Affairs and Communications Division

Policy Contact: Barbara Bonfiglio

Contact Email: Barbara.Bonfiglio@pfizer.com

BACKGROUND AND SCOPE:

The Federal Election Campaign Act (FECA), as amended, was enacted, in part, to limit the influence of corporations in federal political campaigns. This federal law prohibits corporations from providing money or in-kind contributions to federal candidates, political parties, political committees or any other entity in connection with a federal election.

While some states and local jurisdictions have similar prohibitions on corporate contributions, others permit corporations to directly support state candidates, political parties and committees.

All expenditures with respect to U.S. election contributions must be made in compliance with this Policy and with Corporate Procedure #802a - Political Contributions by Pfizer.

POLICY:

Independent Expenditures Prohibited.

It is Pfizer's policy that "Corporate Funds" may not be used for Independent Expenditures, in connection with any federal or state elections, even if Pfizer is otherwise permitted to make contributions. Independent Expenditures are defined under federal law as expenditures for a communication "expressly advocating the election or defeat of a clearly identified candidate that is not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or their agents, or a political party or its agents". For purposes of this Policy, "Corporate Funds" excludes funds that are contributed by the Pfizer PAC, as discussed below. See Corporate Procedure #802a - Political Contributions by Pfizer for further details.

Pfizer PAC.

U.S. federal law allows corporations to pay the costs of establishing and administering political action committees and to pay the costs of soliciting contributions to such committees. The Pfizer PAC is such a political committee and certain services, facilities, and materials are provided by the Company on behalf of the Pfizer PAC. Many state laws allow corporations to support political action committees in the same manner, and Pfizer PAC has created such committees in a number of states.

Under U.S. federal law, participation in the Pfizer PAC is limited to only those Colleagues who hold high-level administrative, executive or managerial responsibilities (also known as the "restricted class"). The Pfizer PAC funds are used to make contributions to candidates for U.S. federal office. The amounts

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that may be contributed to and by a Pfizer PAC are limited by law, and Pfizer has taken the steps necessary to ensure that Colleague contributions to the Pfizer PAC are strictly voluntary and without coercion.

CONSEQUENCE OF NON-COMPLIANCE

Violations of this Policy may result in disciplinary action up to and including termination.