



## CORPORATE PROCEDURE # 802b

### Title: International Political Contributions

Version: 1

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Sponsoring Division: Policy, External Affairs and Communications Division

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### SCOPE

This Procedure governs contributions to political parties, candidates for public office, and election committees in countries outside the United States by Pfizer or any of its affiliates (each a “Pfizer Entity”).

This Procedure does not govern contributions to United States political parties, candidates for public office or election committees, which are covered by Corporate Procedure # 802, Political Contributions By Pfizer.

As set out in Pfizer’s Standards of Business Conduct (the “Blue Book”) Pfizer encourages political activity and participation in electoral politics by Colleagues where appropriate. However, such activity must occur strictly in an individual and private capacity and not on behalf of a Pfizer Entity. Colleagues may not conduct personal political activity on Company time or use Company property or equipment for this purpose.

### BACKGROUND

Pfizer forbids bribery in the conduct of its business in the United States and abroad, and expects all Colleagues to comply with all applicable United States laws, including the Foreign Corrupt Practices Act, all local anti-bribery or corruption laws and regulations, and all applicable Pfizer Policies and Procedures including but not limited to Corporate Policy # 202, Anti-Bribery and Anti-Corruption and Corporate Procedure # 215, International Anti-Bribery and Anti-Corruption.

Pfizer recognizes that the rules relating to political contributions differ from country to country with some countries prohibiting contributions and other countries allowing contributions subject to limitations, restrictions or public disclosure requirements. Pfizer also recognizes that the definition of “political contribution” included in this Procedure is broad. Accordingly, it may encompass payments by a Pfizer Entity that are not “political contributions” as defined by local law. In such circumstances, Pfizer’s broader definition should control and the recommendation and payment of such contributions will be made according to the process set up in this Procedure. In addition, if local law defines political contributions more broadly than Pfizer’s definition, then the broader local definition will control and payment of such contributions as defined by local law will be made according to the process set up in this Procedure.

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## **POLICY**

Neither a Pfizer Entity nor a Colleague on behalf of any Pfizer Entity, may make an improper Political Contribution (as defined below) directly or indirectly to improperly induce a government official to make any governmental act or decision to help Pfizer obtain or retain business or otherwise obtain an improper advantage, or as an improper inducement for such government official to approve, reimburse, prescribe, or purchase a Pfizer product, to influence the outcome of a clinical trial, or otherwise improperly to benefit Pfizer's business activities.

A Pfizer Entity is permitted to make Political Contributions to political parties, candidates for public office or election committees in countries outside the United States where:

- i) it is lawful to do so;
- ii) the Political Contributions are made to support the election of political parties or candidates who support public policy and values important to the innovator pharmaceutical industry, such as innovation and access to medicines;
- iii) the Political Contributions are made in accordance with this Procedure and any local procedures established to implement this Procedure. When local law is more stringent than this Procedure, the local procedures must comply with local law.

## **PROCEDURE**

- A. For the purpose of this Procedure, "Political Contribution" means any contribution made by a Pfizer Entity:
  1. To a properly established and recognized political party in a country outside the United States for general funding purposes or to support a particular campaign.
  2. To a candidate for public office (whether he/she is the current holder of that office or a new candidate) or an election committee in a country outside the United States for the purpose of funding an election campaign or searching for an election candidate.
  3. To a third party with the intent that such Political Contribution will be given to a properly established and recognized political party, candidate for public office or election committee in a country outside the United States. Any such Political Contribution provided to a third party must be made transparently and cannot be undertaken in order to camouflage or hide Pfizer's Political Contribution to the political party, candidate for public office, or election committee.

A Political Contribution should be limited to monetary support (which should only be made by corporate check or wire transfer).

- B. Prior to making a Political Contribution on behalf of a Pfizer Entity, the Colleague recommending the Political Contribution must:

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1. Ensure that internal Pfizer Legal counsel has confirmed that entities such as the relevant Pfizer Entity or the third party through which the Political Contribution is intended to be made are permitted by law to make a Political Contribution in the relevant country and has provided information outlining the financial reporting and public disclosure obligations of the party making the Political Contribution; and
  2. Determine and disclose in the written request for approval whether the Political Contribution will, directly or indirectly, benefit a Government Official (as defined in “Corporate Procedure # 215, International Anti-Bribery and Anti-Corruption) who holds a position other than as a practicing healthcare professional where he or she could influence a decision to approve, reimburse or purchase a Pfizer product, or influence an official act that would benefit Pfizer’s business (*e.g.*, approval of marketing authorization, approval of pricing or reimbursement of a product or issuance of an environmental permit).
- C. When opining on the legal propriety of a proposed Political Contribution, internal Pfizer Legal counsel must either be familiar with the current local laws governing political contributions or seek advice of local counsel.
- D. Each Political Contribution must be delivered in a manner permitted by local law and must not exceed the maximum amount permitted by local law.
- E. All proposed Political Contributions must be approved in writing, before they are made, by each of (1) the relevant local Principal Manager as defined below or his/her designee, (2) the local Legal Director, and (3) the local Director of Public

The Affairs and Policy (or Director of Corporate Affairs or Director of Market Access, depending on the market) should be responsible for the business proposing to make the Political Contribution in the relevant country. In countries where there is no local Legal Director, the Political Contribution must be approved in advance in writing by the Regional Legal Director or the relevant Chief Counsel. In countries where there is no Director of Public Affairs & Policy (or Director of Corporate Affairs or Director of Market Access, depending on the market), the Political Contribution must be approved in advance in writing by the relevant Regional Director of Public Affairs and Policy. For the purpose of this Procedure “relevant local Principal Manager” shall mean the individual who serves as Principal Manager (under Corporate Procedure # 215, Anti-Bribery and Anti-Corruption) for the Division of the Colleague recommending the Political Contribution.

- F. All local procedures for reviewing and approving Political Contributions must be approved in advance in writing by each of (1) the relevant Regional President to whom the Principal Manager reports to, (2) the relevant Regional Legal Counsel to whom the Legal Director reports to, (3) the Regional Director of Public Affairs and Policy, and (4) the Regional Finance Director to whom the local Finance Director reports to, and may not be less restrictive than this Procedure, or where local law is more restrictive than this Procedure, may not be less restrictive than local law.
- G. For the purposes of this Procedure a Political Contribution will be considered to be “approved in advance in writing” if:

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1. The specific contribution has been approved in writing by the relevant members of Senior Management referred to in E above prior to the Political Contribution being paid or committed to, whichever comes first.
  2. The Political Contribution is within specific and well defined criteria for Political Contributions in the relevant country that have been approved in writing by the relevant members of Senior Management referred to in E and F above prior to the Political Contribution being paid or committed to, whichever comes first. Internal Pfizer Legal counsel must regularly confirm that these criteria are accurate and must amend the criteria if he/she becomes aware of any changes in the relevant laws.
- H. Prior to proposing and again promptly before a Political Contribution is paid or committed to, the Colleague recommending the Political Contribution must forward all recommendations regarding the Political Contribution to the appropriate local Finance Director in the relevant country to ensure that no other Political Contributions are being made in the relevant country, which when taken with previous Political Contributions made in the relevant country, would exceed the maximum amount allowed by law.
- I. All Political Contributions must be made by the Pfizer Entity either directly to the political party, candidate or committee or, provided this complies with local law, directly to the third party through which the Political Contribution is intended to be made. Colleagues are not permitted to make Political Contributions on behalf of a Pfizer Entity and will not be reimbursed for any Political Contribution allegedly made on behalf of a Pfizer Entity.
- J. The appropriate local Finance Director in the country of the Pfizer Entity making the Political Contribution should be responsible for compliance with all local finance reporting and public disclosure obligations in respect of such Political Contribution. This compliance includes mapping expenses to the common income statement minor account 928 'Contributions' in Pfizer's consolidated financial reporting system, Hyperion Financial Management (HFM). In addition, use of specific accounts in the Oracle general ledger and Ariba purchasing systems are required for Oracle-enabled markets. All Political Contributions must be accurately and fairly described in Pfizer's books and records, as per the requirements of this Procedure, Corporate Policy # 511, Unrecorded Funds or Assets, False or Artificial Entries and Corporate Procedure # 215, International Anti-Bribery and Anti-Corruption.

The Principal Manager or his/her designee should be responsible for maintaining a record of all Political Contributions made by their Division in their country detailing the date, amount paid and name of recipient. This record together with a copy of any relevant legal opinion and all approvals received for a Political Contribution should be retained, stored and destroyed in compliance with Corporate Procedure # 506, Records and Information Management Procedures unless local law imposes additional or different requirements, and should be subject to periodic auditing.

#### **CONSEQUENCE OF NON-COMPLIANCE**

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