



CORPORATE PROCEDURE # 802a

Title: Political Contributions by Pfizer

Version: 1.5

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Sponsoring Division: Corporate Affairs

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1. SCOPE

Consistent with “Corporate Policy # 802 – U.S. Election Contributions”, this Procedure addresses contributions and expenditures from Pfizer. It does not apply to the actions of company-sponsored state or federal political action committees (PACs) or contributions to political parties, candidates or committees that support elections outside of the United States.

2. BACKGROUND

The Federal Election Campaign Act, as amended, (FECA) 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.

Pfizer has a long-standing policy forbidding the use of corporate contributions in federal elections, and the Company expects all Colleagues to comply with the FECA and Corporate Policy # 802 – U.S. Election Contributions.

The federal contribution ban applies not only to monetary support. It also covers corporate items and services of any monetary value. For this reason, Colleagues are prohibited from using corporate resources, including Pfizer corporate funds or in-kind items or services, to support or oppose a federal election. In state and local jurisdictions that permit corporate contributions, Colleagues must seek review and approval from Corporate Governance Legal prior to committing corporate funds or resources to a state or local candidate, political party or political committee.

Political contributions are made to support the election of candidates, political parties and committees that support public policies important to the industry, such as innovation and access to medicines. Political contributions may not be given to an official in exchange for an official act or to advance particular business projects.

3. PROCEDURE

A. Federal elections: Colleagues may not use any Pfizer resource in connection with a federal election. This includes providing Pfizer monetary support (e.g., seeking expense reimbursement for an individual contribution) or in-kind support, including the use of Pfizer computers, the Pfizer e-mail system, employee lists (web-based telephone lists and hard copies), conference rooms or other Pfizer facilities, stamps, envelopes, letterhead or the Pfizer logo, use of copiers or the internal office mail system.

Colleagues may not “bundle” individual contributions from other Colleagues, then use Pfizer stamps, letterhead, envelopes or administrative support to send such contributions to a federal candidate or committee.

1. Personnel time: Colleagues may not spend time during working hours in support of, or in opposition to, a federal campaign.

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Managers may not request Colleagues whose work the manager supervises (administrative personnel included) to assist them in campaign fundraising or volunteer efforts. Participation in political activities must be the independent, voluntary decision of each Colleague.

2. Use of Corporate Resources: If a Colleague has unintentionally used corporate resources in connection with a federal campaign, the Colleague must contact Corporate Governance Legal and provide reimbursement to Pfizer within five business days of becoming aware of such use of funds. Reimbursement must be equal to the fair market value of the item or service provided to the campaign or committee. Corporate Governance Legal will determine fair market value for reimbursement purposes.
- B. State and local elections: Because state and local laws relating to political contributions differ substantially, all corporate contributions or use of corporate resources must be reviewed and approved in advance by Corporate Governance Legal.
 - C. Independent Expenditures: An Independent Expenditure is defined under federal law [11 CFR 100.16(a).] as an expenditure 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.” Colleagues are prohibited from using Pfizer corporate funds for the direct and distinct purpose of funding an Independent Expenditure, as defined above, in connection with any federal or state election. U.S. Federal law allows corporations to pay the costs of establishing and administering political action committees (PACs) and to pay the costs of soliciting contributions to such committees out of PAC funds.
 - D. Corporate Governance Legal, is responsible for providing advice and counsel regarding contribution limits, restrictions and reporting obligations. Corporate Affairs is responsible for retaining a list of all corporate contributions provided to state or local candidates and committees, including the recipient’s name, amount and date of the contribution. The Treasurer of the Pfizer Political Action Committee and Policy, Corporate Affairs should be responsible for compliance with campaign finance reporting and public disclosure obligations required by state and local laws.
 - E. Annual report to shareholders: All federal and state contributions and expenditures made by the Company should be disclosed annually on the Pfizer website. For the purpose of this paragraph, the words “contributions” and “expenditures” shall include direct and indirect monetary contributions to candidates, as defined by 26 U.S.C. § 162(e)(1)(B), and contributions to political committees, ballot measures and political parties.

In addition to disclosing all federal and state contributions and expenditures, Pfizer will request trade associations that received from Pfizer total payments of \$100,000 or more in a given year to report the portion of Pfizer dues or payments used for expenditures or contributions that if made directly by Pfizer would not be deductible under 162(e)(1)(B) of the Internal Revenue Code. The Company will disclose such information received from such trade associations annually on the Pfizer Inc website.

This report should also include Company Policies and Procedures related to political contributions and expenditures.

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Prior to publication, the report should be presented to the Corporate Governance Committee as well as the Board of Directors of Pfizer.

4. CONSEQUENCES OF NON-COMPLIANCE

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