

Number/Title:	Corporate Policy 21 / Political Contributions
Revision Number:	2.0
Date Established:	1 March 1976
Date Last Reviewed:	13 December 2010
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Policy Statement

In the United States, it is unlawful for any corporation to make a contribution or direct expenditure to a federal candidate, political committee or political party. Therefore, it is the policy of Merck & Co., Inc. not to contribute any corporate funds or other assets to any of these federal entities.

Outside the United States, and within the United States, at the State and local levels, laws vary by jurisdiction as to the lawfulness of contributions or direct expenditures by corporations in connection with an election. Outside the United States, and within the United States, at the State level and within Puerto Rico, where corporate political contributions are legal and accepted as part of a company's role as a participant in the political process, such contributions may be made, but only if (a) approved by the Company's General Counsel; (b) determined by the Company's General Counsel to be legal and proper under all applicable laws, regulations, and Merck policies; and (c) included among other such disbursement in an annual report from the General Counsel to the Company's Board of Directors.

Strict compliance with accepted accounting rules and controls is required. Company records must accurately reflect and properly describe the transactions they record. Political contributions shall be recorded on the books of the Company making the contribution and shall be taken as tax deductions only to the extent permitted by the laws of the country concerned.

The above prohibitions and limitations relate only to the use of corporate funds. Employees, as individuals, are encouraged to participate actively in the political process, including making personal contributions to candidates or political parties of their choice, and to the Company-sponsored Political Action Committee (Merck PAC: U.S.). In addition, employees, acting in their personal capacity, are permitted to engage in volunteer activity on behalf of federal or state candidates or political parties. The scope of permissible volunteer activity is restricted by federal and state law and cannot be directed by the Company.

At the same time, this policy affirms the commitment of the Company to participate in the political process by supporting non-partisan registration and political education activities; expressing the Company's views in legislative forums; and communicating on public issues with employees, stockholders and their families, legislators, health professionals and others with common interests, customers, and the general public.

Employees who have any questions regarding application of this policy should discuss the matter with their department heads. If a legal or accounting question is involved, appropriate staff personnel of those departments should be consulted.

Corporate Policies, Procedures, and Guidelines (CPPGs) are critical to the success of Merck & Co., Inc. and its subsidiaries. Every Merck employee and contingent worker is responsible for understanding and appropriately applying Merck's Corporate CPPGs. You must check with your manager for clarification if you are unsure how / whether the CPPGs apply to you or your work, and your conduct must be in accordance with these regulations at all times throughout your employment and/or relationship with Merck & Co., Inc. . . .
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