



## **PUBLIC POLICY POSITION**

### **Independent Expenditure Statement**

Merck has not used corporate funds to make any direct independent expenditures on behalf of candidates running for public office and does not currently have plans to use independent expenditures as part of Merck's corporate political contributions program.

Should a situation warrant Merck's participation in independent expenditures, we would be fully transparent as we are with all other political contributions. This includes making all legally required filings, including with the Federal Election Commission, as well as disclosing our contributions on our external website. Independent expenditures would receive the same scrutiny as all of our other corporate contributions. Merck provides an annual report on its corporate contributions to the Board of Directors and reviews its program with the Board Committee on Public Policy and Social Responsibility. Additionally, independent expenditures would require approval by Merck's Corporate Political Contributions Committee which is comprised of senior leaders representing Merck's major divisions.

With regard to trade association independent expenditures, Merck will actively monitor independent political expenditures made by associations or other tax-exempt groups where the issue relates to pharmaceutical policy. We do not plan to condition our membership specifically on an association's decision relative to its policy on reporting independent expenditures, but we do encourage disclosure of political activity on the part of all organizations to which we belong.

**Approved: March 2011**