



**May 7, 2018**

## **Political Contributions Policy**

At Biogen, our mission is clear: we are pioneers in neuroscience. Since our founding in 1978 as one of the world's first global biotechnology companies, Biogen has led innovative scientific research with the goal over the last decade to defeat devastating neurological diseases. In furtherance of our objectives, we believe it is important to be an active participant in the political process in the U.S. and that we should support the legislative process by contributing prudently to state and local candidates and political organizations when such contributions are permitted by applicable law.

Through our policy research, development, and stakeholder dialogue activities, we focus on a number of areas that are important to our company, the people we serve and our industry. Those efforts include supporting office holders who can assist in advancing our public policy agenda. Generally, contributions are made to office holders and candidates whose views on industry specific issues are consistent with or open to our long-term legislative and regulatory goals or to those who represent the communities served by our company, including where our employees and facilities are located.

## **Federal Political Activities**

### *Biogen Federal Political Action Committee Contributions*

We have established the Biogen Federal Political Action Committee (Biogen PAC), a federally-registered political action committee, to provide our eligible employees and members of our Board of Directors a direct means to voluntarily pool their resources to support candidates for federal office who share the values and ideals of our company, employees, and community.

The Biogen PAC Approval Committee, comprised of employees who are Biogen PAC participants, assists our Government Relations & Public Policy Department in selecting candidates to support. The Biogen PAC operates in accordance with applicable federal and state laws and supports candidates without discrimination based on political party affiliation. All contributions made and received are publicly disclosed in reports filed with the U.S. Federal Election Commission, which may be viewed on the U.S. Federal Election Commission's website at [www.fec.gov](http://www.fec.gov).

### *Federal Independent Expenditures*

Although it is permissible in the U.S. to use corporate funds to make independent expenditures on behalf of federal candidates, we have not made and do not plan to make any independent expenditures on behalf of federal candidates. If our position on making independent expenditures changes, we plan to disclose those activities on this website.

## **State and Other Corporate Political Contributions**

Where permitted in certain jurisdictions, we may, from time to time, make corporate state and local political contributions and expenditures to support election campaigns, party committees, or ballot measures. If we do make such contributions or expenditures, we will support candidates without discrimination based on political party affiliation. On a semi-annual basis (which commenced in January 2014), we have made and will continue to make a list of all corporate state and local political contributions and independent expenditures, if any, supporting or opposing political candidates, committees, parties and ballot measures available on our website.

No corporate contributions shall be made by Biogen to a foundation, company, or not-for-profit organization directly affiliated with or named after a sitting state or federal elected or appointed government official.

## **Political Review Committee**

All permitted corporate political contributions are subject to approval by a Political Review Committee consisting of at least three members, currently comprised of our Chief Financial Officer, Executive Vice President, Pharmaceutical Operations & Technology, and Senior Vice President of Corporate Affairs.

## **Trade Associations, Industry Groups and Other Organizations**

In an effort to bring about consensus on broad policy issues that can impact our business objectives, we are a member of several industry and trade groups which represent the biotechnology, pharmaceutical and business community at large. Our participation as a member of these various industry and trade groups comes with the understanding that we may not always agree with the positions of the larger organizations or other members, and we are committed to voicing our concerns as appropriate through our colleagues who serve on the boards and committees of these groups. Click [here](#) for a listing of the trade organizations to which we pay more than \$25,000 per year in membership dues or other payments. On an annual basis, we will also make available on our website the dollar amount of our dues or payments allocated by the listed trade associations that have been identified as non-deductible expenditures under Section 162(e)(1) of the Internal Revenue Code.

Should we make contributions to Section 501(c)(4) “social welfare” organizations or Section 527 organizations, such contributions will be disclosed on a semi-annual basis on our website.

## **Additional Information**

The Corporate Governance Committee of our Board of Directors will review this policy, together with our political contributions and our contribution practices, annually.

Questions about our Political Contributions Policy should be directed to: Chief Corporation Counsel, Biogen Inc., 225 Binney Street, Cambridge, MA 02142.