



## LOBBYING AND POLITICAL ACTIVITIES PRINCIPLE

### Principle Statement:

As a concerned member of our communities, GTG actively participates in public policy and legislative advocacy, or "lobbying". As appropriate, GTG also may support candidates and political committees in elections. GTG resources may only be used for political or lobbying activities when consistent with GTG's Code of Conduct Principles and approved in advance by the PAC Board (for the U.S.) and the Area Corporate Affairs Vice President (outside the U.S.) and assigned GTG legal counsel.

GTG's Government Affairs organization coordinates and oversees GTG's lobbying and political activities. Before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on GTG's behalf, GTG employees must consult GTG Government Affairs.

GTG has constituted a PAC Board, which is made up of senior GTG executives and oversees GTG's political contributions and the activities of GTG's Political Action Committee (GTG PAC). GTG PAC is a nonpartisan fund created under U.S. law and comprised of voluntary employee and stockholder contributions. GTG PAC is used to make contributions to U.S. federal, state, and local candidates as permitted by law.

GTG respects our employees' rights to participate in the political process and to communicate with their elected representatives using their own time and resources. However, GTG resources and facilities must not be used for private, non-GTG, political or lobbying activity. GTG values the engagement of public officials on matters that affect our communities and the industries in which we participate. Any such engagement on GTG premises or that involves the use of GTG resources must comply with all relevant laws and not give rise to any actual or perceived conflicts of interest. GTG employees are generally permitted to host elected and other public officials on our premises, subject to certain limitations, in accordance with Company policies and applicable laws. Elected officials, candidates for elective office, or their campaign surrogates may not, however, be hosted at a GTG facility or on GTG premises within 15 days prior to any election in which he or she is a candidate ("prohibited period"). The prohibited period includes hosting an elected official, candidate, or surrogate for any election or non-election related purpose. The prohibited period applies regardless of whether the official, candidate, or surrogate intends to reimburse the Company for the use of its facilities, and the prohibited period applies whether the GTG host or sponsoring employee is acting in a personal capacity or otherwise.

### Purpose:

Lobbying is an appropriate way for companies like GTG to educate policymakers about the legitimate interests of GTG and our employees, but these communications must be conducted and reported in compliance with applicable laws.

The use of corporate resources to influence the political process is strictly regulated to protect and promote the integrity of the political processes of countries around the world. In the U.S. and around the world, national, territorial, state, and local governments often prohibit the use of corporate resources to support or oppose candidates or political committees.

This Principle applies globally to all employees and may apply to those acting on behalf of GTG. See the Compliance Principle for information on when a third party might be covered by the Code of Conduct Principles.





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### Additional Guidance:

- "Lobbying" means communicating with lawmakers and other public officials to help shape public policy on laws, regulations, and issues that affect our business and our employees. In the United States, GTG employees and others acting on GTG's behalf must comply with federal, state, and local lobbying laws. Lobbying laws vary depending on the level of government and government body and the nature of our engagement. In some states, traditional sales activities may constitute lobbying, triggering registration and reporting requirements. To ensure that GTG has followed registration and reporting laws that may apply, all employees must consult with GTG Government Affairs and their assigned GTG legal counsel in advance of contacting elected representatives or government employees to determine whether the proposed contact constitutes lobbying and requires registration, reporting, or other action. Any lobbying activities outside of the U.S. must be approved by GTG Government Affairs and assigned legal counsel.
- Any engagement of an external (i.e., non-employee) lobbyist or government affairs consultant must first be reviewed and approved by the Government Affairs Department and assigned GTG legal counsel. Any such engagement must be made under a written contract that requires the lobbyist to comply with all applicable registration and reporting laws, as well as GTG's Code of Conduct Principles. Reporting of lobbying activities and expenses is handled by GTG Legal Affairs.
- Unless permitted in advance by the PAC Board in the U.S. or the Area Corporate Affairs Vice President outside the U.S., with review by assigned legal counsel, GTG does not permit employees to distribute campaign literature, solicit campaign contributions, or participate in other political activities during paid working hours.
- GTG Government Affairs may – as permitted by law – invite officeholders and candidates for public office to visit GTG facilities and address GTG employees, except that no such visits may occur during the prohibited period (described above). No GTG employee is required to attend such events. GTG may refuse or limit candidate appearances on GTG property as permitted by law.
- GTG PAC is a non-partisan fund used to make contributions to U.S. federal and, where permitted, state or local candidates, parties, and political committees. GTG has established a PAC Board to oversee GTG and GTG PAC contributions to political campaigns, parties, or other political committees in the United States. Chaired by a senior GTG executive, the PAC Board reports to the Chief Executive Officer. Upon request, the PAC Board also reports to the Corporate Operations Committee and the Nominating and Governance Committee of the Board of Directors on GTG's political activities and contributions. Eligible GTG employees and shareholders may be asked to voluntarily contribute to the GTG PAC as permitted by U.S. law. Any employee may refuse to contribute to GTG PAC without fear of reprisal. GTG will not reimburse any person for making contributions to GTG PAC or for any political contribution. Coercion of any employee to contribute to GTG PAC or to make any political contribution is unlawful.
- Outside of the United States, GTG will only make political contributions if approved in advance by the Area Corporate Affairs Vice President and assigned legal counsel.

### Penalties:

Violations of the law and GTG's Code of Conduct may result in discipline, up to and including termination from employment.

