

## **Peer Fundraising Guidelines: The Dos and Don'ts of PAC Solicitation**

***When discussing the organization's PAC with your colleagues, you should always:***

- Describe the purpose of the PAC and its benefit to the company and employees.
- Emphasize that PAC contributions are completely voluntary and employees may refuse to contribute without fear of reprisal.
- Underscore the fact that decisions about whether to participate in the PAC will not advantage or disadvantage employees in any way.
- Encourage employees to contribute through payroll deductions.
- Make sure employees know that suggested contribution guidelines are just that—suggestions—and that employees are free to contribute more or less...or nothing at all.
- Remind employees that PAC contributions are **not** tax deductible [nor is charity match, if applicable].
- Inform employees that, under federal law, PACs are required to report the name, mailing address, occupation, and employer for each individual whose total contributions exceed \$200 in a calendar year. Let them know that this information is filed with the Federal Election Commission by the PAC treasurer.

***When discussing the Novo Nordisk Changing Diabetes PAC with your colleagues, you should never:***

- Directly or indirectly coerce or threaten employees to secure contributions. Coercion may include:
  - Suggestions that an employee's supervisor will know whether the employee contributes to the PAC.
  - Use of words that indicate contribution is a condition of employment (e.g., "must contribute" or "expected to contribute").
  - Suggestions that contributing will affect opportunity to advance within the company (i.e., do not discuss issues regarding promotions or compensation with your PAC fundraising discussion).
  - Follow-up communications that start with "I know you have not contributed to the PAC..." or something similar.
  - Public or private communication (written or verbal) about the need for a specific person to contribute to win a competition or fundraising challenge.
  - Suggestions that PAC fundraising efforts are similar to charitable drives.
  - Asking an employee whether they have given to the PAC yet.
- Characterize the PAC as helping to gain access to candidates or helping get favorable action on legislation/get laws passed. Discuss the PAC as a tool that helps elect candidates who are supportive of the company and issues in general.
- Solicit foreign nationals or employees who do not meet eligibility requirements.
- Solicit one-on-one or in small groups a subordinate or any employee over whom you have authority. (A mass email solicitation from a senior employee to a large segment

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of the restricted class is permissible, as long as the communication is not focused on one individual).

- Try not to answer questions if you are unsure of the answers. Instead, tell the employee that you will get back to him or her later with the information, or feel free to refer him or her to **xxx contact in government affairs**.