

THIS POLICY IS A SAMPLE ONLY. ANY ORGANIZATION DESIRING TO IMPLEMENT SUCH A POLICY SHOULD CONSULT WITH COUNSEL AS TO HOW THE POLICY WOULD APPLY TO IT.

POLITICAL CONTRIBUTIONS POLICY
OF [COMPANY]

This policy (this “Contribution Policy”) governs political contributions made by Company employees (each, an “Employee”) – regardless of position – to state and municipal officeholders, candidates for these offices and certain political organizations. For the purposes of this policy, “Company” includes [COMPANY], its subsidiaries and affiliated entities, including development or investment ventures managed by the Company.

Background

The federal government and many states have enacted laws that restrict companies in doing business with state and municipal authorities if the company or certain of its employees make political contributions to state and municipal officeholders, candidates for office and certain political organizations. These laws are intended to eliminate “pay-to-play” practices, whereby politicians award business to a company in return for the company or its employees making political contributions to the politician. The penalties for violating these laws can be severe. For instance, a company may be banned from doing business with a state or municipal authority for several years after the company or certain of its employees make political contributions to politicians who are in a position to award the government authority’s business. In addition, a company that has certain contracts with a government authority may be fined or penalized if the company or certain of its employees make political contributions to officeholders who are in a position to control or influence the award of those contracts.

The Company does or may do business with government authorities and needs to ensure that it may continue to do so. Accordingly, before making any political contributions to an officeholder, candidate for office or political organization in any state or municipality, each Employee must comply with this policy.

This policy may have the effect of prohibiting you, your spouse or unemancipated¹ children from making certain political contributions or requiring you, your spouse or unemancipated children to disclose political contributions. For this reason, it is important to note that the Company will not implement this policy based on the political philosophy or positions taken by a particular officeholder, candidate, party or other political organization. Rather, this policy will be implemented solely to ensure that political contributions made by the Company and/or Employee do not result in the Company either violating the federal and state contribution laws or being banned from doing business with government authorities with which the Company intends to do business.

Policy

¹ Children who you are still supporting.

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Company Contributions. The Company will not contribute any Company funds or assets to any political party, committee, organization, official or candidate for any office (whether local, state or federal) in the United States or any foreign country without the specific approval of the Compliance Officer. This includes the Company: (i) making direct contributions; (ii) hosting fundraisers, both on Company property and in other locations (like hotels or convention centers); (iii) purchasing food, gifts or other goods to be used at political events or fundraisers; (iv) lending the Company name to political events or fundraising efforts; (v) using Company email accounts or letterhead for political purposes or (vi) reimbursing Employees for donations or expenses incurred in connection with any of the foregoing. This list is not exclusive and Employees should contact the Compliance Officer before providing any Company assets, whether directly or indirectly, to an officeholder, candidate for office, political party or other political advocacy group, or permitting the use of the Company trade names by these persons or organizations.

Employee Contributions. Covered Persons, their spouses and their unemancipated children may not make a political contribution to persons holding the offices listed on Schedule A, candidates for those offices, or political organizations listed on Schedule A without the specific consent of the Compliance Officer. "Covered Persons" are those Employees listed on Schedule B. From time to time, the Compliance Officer may amend the schedules. If you are a Covered Person, you must ask the Compliance Officer for the current version of the schedule before you, your spouse or unemancipated children make any political contributions.

Reporting. The Company may be required to file reports with state or municipal election bureaus of political contributions made to state or municipal officeholders and candidates for those offices by its Employees, their spouses and unemancipated children. These bureaus may make the reports publicly available. As a result, the Compliance Officer may distribute questionnaires to Employees from time to time asking them to list all the political contributions that they, their spouses and unemancipated children have made to state and municipal officeholders during the calendar year. If requested to do so, you must complete these questionnaires and return them by the dates indicated on the questionnaires.

Penalties. Failure to comply with this policy may result in disciplinary action including, but not limited to, termination of employment.

Questions. If you have any questions concerning this policy, please contact the Compliance Officer at the number or email listed below.

Compliance Officer: [NAME]

Telephone: [TELEPHONE]

Email: [EMAIL]

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SCHEDULE A

Covered Political Offices and Organizations

**[CREATE LIST BASED ON CONTRACTS ENTERED
INTO AND FUNDING RECEIVED]**

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SCHEDULE B

Covered Persons

[LIST EXECUTIVES AND OTHER COVERED PERSONS]