

Policy Overview: Political Participation, Contributions, and Lobbying Activities

As a financial services firm, The Charles Schwab Corporation (the “Firm”) is subject to substantial regulation of its business. Changes in laws, rules and regulations may pose risks to the Firm and its performance. The Firm believes that it is in the best interest of the Firm, its employees, clients and stockholders to be engaged in discussions concerning the effectiveness of current and proposed regulations and in other public policy and rulemaking activity that might affect its business. The Firm and its personnel also are subject to rules and regulations that limit, prohibit, or require reporting of certain political contributions made by the Firm or its employees. The Firm intends to comply fully with such laws and regulations.

Employee Political Participation and Contributions

The Firm respects the right of its employees individually to participate in the political process. Employees may participate in the political process or make political contributions from personal funds subject to applicable law. Due to the nature of certain job responsibilities (e.g., investment advisory roles that may have business with public funds), some employees may not make political contributions without first obtaining pre-clearance for the contribution.

Employees must contact the Office of Legislative and Regulatory Affairs or Compliance before accepting a position to serve on a government advisory body, as such activities may involve legal and compliance requirements.

Employees shall not engage in any of the following:

- Use Firm resources to make contributions to any candidate for public office or the candidate’s committee, political party, ballot measure committee, or political action committee supporting or opposing any ballot initiative or candidate for election;
- Request reimbursement from the Firm for political contributions made from the employee’s personal funds;
- Coerce Firm personnel to make political contributions or engage in political activities of any kind; or
- Permit campaign appearances on corporate premises by candidates for federal, state, or local office.

Corporate Funds and Lobbying Activities

The Firm does not contribute to lawmakers, political candidates or political parties. The Firm reports its lobbying activities and expenses and registers employees who engage in lobbying activities in accordance with federal law. Lobbying activities and employees who engage in lobbying activities must be approved and overseen by the Firm’s Office of Legislative and Regulatory Affairs. Lobbying activities and expenditures are reviewed annually by the Nominating and Corporate Governance Committee of the Firm’s Board of Directors. Additional oversight is provided by the Board’s Audit and Risk Committees.

Political Action Committee

The Firm discontinued its political action committee in 2021.