



## Statement of Political Activity

### Corporate Political Activity Principles

SVB's corporate responsibility includes participating in the political and public policy process, specifically in areas that impact the innovation economy and the banking industry, as well as our clients, shareholders, employees, communities, and business. It is important that we engage with legislators and policymakers, where appropriate, or support initiatives to advocate constructively for the long term interests of SVB and our key constituents. We focus our activities in the United States and in international office locations.

We are a highly regulated financial institution and are subject to extensive laws and regulations relating to political contributions. Accordingly, we conduct any political activity in compliance with applicable laws and regulations and as further described in this Statement of Political Activity.

### Oversight

SVB's political activities are managed by the Office of Government Affairs, headed by SVB's General Counsel. The function includes advocacy planning and activities, administering the SVB PAC (as discussed below), complying with applicable laws, and establishing appropriate policies and processes to address relevant areas including reporting, disclosures and internal approvals of political contributions (to the extent any and as permitted by law).

Moreover, SVB's political activities, including political contributions, are overseen and periodically reviewed, on at least an annual basis, with the Governance Committee of the Board of Directors. The Board of Directors and the Governance Committee recognize the importance of appropriate governance and risk management of our corporate political activities, and reviews our activities for alignment with SVB's business, strategy, reputation and mission, as well as compliance with applicable laws and regulations.

The Governance Committee also reviews and approves this Statement of Political Activity.

### Political Contributions; SVB PAC

Political contributions are made primarily through a federal political action committee, sponsored by SVB --- the Silicon Valley Bank Political Action Committee (previously named SVB Financial Group Political Action Committee) ("*SVB PAC*").

The SVB PAC provides an opportunity for eligible employees to participate in the political process on a voluntary basis, utilizing financial resources pooled together from such employees. Any solicited funds are managed on a segregated basis, and used to make campaign contributions, on a nonpartisan basis, to individual candidates, parties, committees or other political action committees whose views and positions are aligned with the interests and objectives of SVB and our constituents. Contributions are determined by the employee members of the Board of Directors of the SVB PAC. Information about contributions made through the SVB PAC is publicly available on the Federal Elections Commission's website ([www.fec.gov](http://www.fec.gov)).

As a corporation, SVB's political contributions are limited:

- We do not contribute directly to individual election candidates for public office.
- We do not contribute directly to political parties.
- We do not make political contributions to federal candidates and campaigns because we are prohibited by law from doing so.
- We may, where permissible by law, contribute to local or state initiatives or certain groups or committees which we believe support the interests of our communities, our clients and/or our business.

To the extent we make any, SVB's political contributions are publicly reported in accordance with applicable law and our company policy.<sup>1</sup>

### **Public Policy Advocacy**

SVB may discuss public policy matters to elected officials at different levels of government, specifically matters that are important to our business, clients, communities and the innovation economy. We may engage registered lobbyists to assist us with our advocacy efforts. Lobbying activities, to the extent any, are reported as required by applicable federal, state and local law. Reports filed with the United States House of Representatives and Senate are publicly available at <http://lobbyingdisclosure.house.gov/>.

### **Trade Associations**

We participate in industry trade organizations that are relevant to our public policy objectives, especially the promotion of the innovation economy. Our participation and membership in these organizations is helpful to our business and our clients, especially to gain industry and business insights, build relationships within the industry, and collaborate on public policy topics of mutual interest. Participation as a member of these organizations comes with the understanding that we may not agree with every position an organization or its members take on an issue. While we generally believe that these organizations take positions and address issues in a collective industry manner that help advance positions consistent with SVB's interests, we may, from time to time, have a different position or perspective than the trade associations of which we are members.

Our primary trade association relationships include TechNet, Silicon Valley Leadership Group, the Bay Area Council, Tech:NYC, Mid-sized Bank Coalition and American Bankers Association.

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<sup>1</sup> Political contributions and expenditures are extensively regulated by applicable public reporting laws and regulations. Information about such contributions and expenditures are generally publicly available. Nevertheless, in accordance with SVB's policy, beginning in 2019, we will disclose on our website semi-annually political contributions over \$500 (per recipient in a calendar year), to the extent any, that are directed to: (i) political groups/committees (groups organized under Section 527 or 501(c)(4) of the Internal Revenue Code or independent expenditure committees), and (ii) ballot initiatives or measures.

## **Employee Participation**

Pursuant to SVB's Code of Conduct, SVB believes that it is important for every person to take an active interest in political affairs and we encourage voting in elections. We do not take into consideration employees' political views or affiliations, nor do we discriminate on the basis of those views. Personal political activities must not be conducted during work hours (other than voting) and must not involve the use of SVB resources.

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## Corporate Political Contributions Report\*

<b>Recipient</b>	<b>Amount</b>
<b><i>January 1 – December 31, 2019</i></b>	
Bay Area Legislative Leaders PAC	\$5,000
<b><i>January 1 – December 31, 2020</i></b>	
Bay Area Legislative Leaders PAC	\$5,000
<b><i>January 1 – December 31, 2021</i></b>	
Bay Area Legislative Leaders PAC	\$5,000

*\* Beginning in 2019, we will disclose our corporate political contributions semi-annually pursuant to our policy.*