



## Invesco Ltd.

### U.S. Policy Statement on Political Activities

**1. Objective of Our Activities.** As a global investment firm dedicated to creating greater possibilities for our clients, we believe it is important to be an active participant in the political process with the objective of promoting and protecting the economic future of the company, our clients and stockholders.

**2. Invesco Government Affairs Department.** Invesco's Government Affairs Department works to strengthen Invesco's connectivity to key public policy conversations and enhance our reputation with leaders in the legislative and regulatory ecosystem.

The team leads Invesco's advocacy efforts in close coordination with internal stakeholders and external resources. We seek to continually earn and maintain a reputation as a leader in our industry and a trusted resource and advisor for key decision makers in government.

Leveraging on-the-ground interactions with policymakers, the Government Affairs team serves as a resource to keep internal and external stakeholders abreast of the latest political and public policy developments that may impact our company, clients, and stockholders.

**3. Corporate Political Activities.** Invesco's participation in the political process in the United States is subject to extensive laws and regulations at the national, state and local levels. In the United States, Invesco does not contribute corporate funds to federal or state candidates, political party committees, political action committees, or any political organization exempt from U.S. federal income taxes under Section 527 of the U.S. Internal Revenue Code. Additionally, Invesco chooses not to spend corporate funds in the United States directly on independent election expenditures or electioneering communications.

**4. Lobbying Efforts.** Invesco engages in lobbying deemed to be in the best interests of the company, its clients and shareholders. However, Invesco in the United States does not currently engage in "grassroots lobbying." Invesco also does not make payments to influence the outcome of ballot initiatives in the United States. Information about Invesco's U.S. lobbying activities, including contributions required to be disclosed under the Lobbying Disclosure Act (LDA), is publicly available on the LDA Reports [website](#)<sup>1</sup>.

**5. Participation in Trade Associations, Industry Groups and Other Organizations.** Invesco maintains memberships with a variety of U.S. trade associations. Participation as a member of these associations comes with the understanding that we may not always agree with all of the positions of the organizations or other members. We believe the associations, however, take positions and address issues in a collective industry manner and often advance positions consistent with the interests of the company, our clients and our shareholders. Invesco's Government Affairs Department is responsible for monitoring the

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<sup>1</sup> <https://lda.senate.gov/system/public/>

appropriateness and effectiveness of the political activities undertaken by the most significant U.S. trade associations in which Invesco is a member.

Invesco discloses the principal U.S. trade organizations utilized by the Government Affairs Department to which Invesco belongs as well as those U.S. trade organizations that receive from Invesco total payments of \$25,000 or more for membership fees and/or dues in a given year. Invesco will update such information annually on the company's website. Prior to publication, such information shall be reviewed by the Nomination and Corporate Governance Committee of the Invesco Ltd. Board of Directors (the Committee). A list of the principal U.S. trade associations to which we belong as well as those U.S. trade associations to which we paid in excess of \$25,000 in 2022 for membership fees and/or dues can be [found here](#).

**6. Invesco Employee Political Action Committee.** Invesco maintains a U.S. federal political action committee (PAC). The PAC is funded in accordance with applicable U.S. federal law on a voluntary basis by U.S.-based employees. Participation in the PAC has no bearing on any aspect of an employee's career at Invesco. As required by law, all political contributions by the PAC are reported to the U.S. Federal Election Commission (FEC) and are publicly disclosed on the FEC [website](#)<sup>2</sup>. All political contributions are made without regard to the personal political preferences of individual Invesco board members, officers and employees of the company.

**7. Compliance and Oversight Management.** Invesco maintains processes designed to seek to ensure that its activities are conducted in accordance with this policy statement and applicable laws and regulations governing political contributions in the United States. Invesco encourages civic and community involvement by its employees. All employees are required to annually review and acknowledge their compliance responsibilities regarding political contributions and must submit all of their proposed personal political contributions to our Compliance Department to determine if such contributions are consistent with applicable legal restrictions.

The Committee assists the Board in oversight of the company's U.S. political activities. The Committee reviews and discusses with the Global Head of Public Policy, at least annually, the company's U.S. political activities, including political spending and lobbying activities and expenditures in the United States. The Committee also periodically reviews and discusses this policy statement with management and shall approve any changes to this policy statement.

This policy statement is intended as a component of the flexible framework within which the Company operates. It is not intended to establish any legally binding obligations.

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<sup>2</sup> <https://www.fec.gov/data/committee/C00253369>