

# Political Engagement Policy

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## I. Version Change Summary

Version Date	Author	Change Summary
25 Jan 2024	ML	Initial Version

## II. Overview and Purpose

FactSet Research Systems Inc. and its subsidiaries (“FactSet” or the “Company”) have adopted the following Political Engagement Policy (the “Policy”).

This document sets forth the policy and procedures for FactSet and our employees with respect to participation and engagement in campaign finance and political activities.

## III. Application of the Policy

This Policy applies worldwide to the Company and all its officers and employees.

## IV. FactSet Activities

FactSet does not make political contributions at the federal, state, or local levels in the United States. Under United States federal law, FactSet may not contribute corporate funds or make in-kind contributions to candidates for federal office or for national political party committees. In addition, it is FactSet’s policy to comply with all applicable laws that restrict or prohibit corporate political giving at the state and local levels in the United States, and to abide by all applicable laws globally with respect to political contributions and corporate political action.

FactSet prohibits political contributions in the United States from corporate funds, including contributions to so-called “Section 527” entities or independent expenditures political action committees (“Super PACs”). FactSet has also voluntarily elected not to spend corporate funds directly on so-called “independent expenditures,” including electioneering communications, despite the U.S. Supreme Court’s decision in *Citizens United* entitling corporations to make such expenditures.

FactSet participates in direct advocacy on certain public policy issues that we believe foster global economic growth. Our Global Government Affairs group is responsible for coordinating our global public policy priorities. From time to time, we may engage in discussions with all levels of government on public policy or regulatory issues. Global Government Affairs coordinates with our business leadership and Legal, Regulatory Solutions, and Compliance teams on an ongoing basis to identify legislative and regulatory priorities both regionally and globally. In formulating and updating public policy priorities, Global Government Affairs considers challenges to our operations and opportunities for expansion with the goal of prioritizing public policies that will increase shareholder value and contribute to the overall success of FactSet.

All federal lobbying costs and issues to which they relate are disclosed in the United States under the Lobby Disclosure Act, which requires that FactSet file reports on a quarterly basis with the United States Congress. These reports are available at:

<http://www.senate.gov/legislative/publicdisclosure/LDAreorts.htm>

## **V. Employee Activities**

FactSet employees may participate in political activities in the communities where they live and work; however, they may only participate on their own time and at their own expense. Employees may never use FactSet resources or assets for political activities without prior authorization from the Global Government Affairs and Compliance Departments.

Employees are also required to disclose and obtain pre-approval from the Global Government Affairs and Compliance teams prior to seeking political office, holding elected or appointed political posts, serving on municipal boards, or holding similar positions in government.

FactSet complies with applicable anti-bribery and anti-corruption laws and with all applicable regulations restricting the giving of gifts to domestic and foreign government officials. For more information on giving gifts to government officials, please review FactSet's [Code of Business Conduct and Ethics](#) and our [Anti-bribery and Corruption Policy](#), both available in [FactSet's Policy Portal](#).

## **VI. Related Policies and Procedures**

Code of Business Conduct and Ethics  
Anti-bribery and Corruption Policy  
Gifts and Entertainment Policy

## **VII. Guidance and Assistance**

If you have questions about this Policy or any other FactSet policy, you may obtain additional guidance by emailing [Compliance@FactSet.com](mailto:Compliance@FactSet.com). Alternatively, you may speak with your supervisor, your HR Business Partner, the Chief Legal Officer, or the Chief Compliance Officer or contact the Ethics Action Line, available on FactShare or at: <https://www.FactSetEthicsActionLine.com>.

Remember, however, that the ultimate responsibility for complying with the law and this Policy rests with you. In this regard, it is imperative that you use your best judgment.

1. Any violation of this Policy or your refusal or failure to cooperate fully with FactSet in any investigation of a possible violation of this Policy will be regarded as a serious matter and could lead to disciplinary action.

2. If you suspect a violation of this policy has occurred, please contact:

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+1.212.857.2912 or +1.347.491.8160

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