# **Exxon Mobil Corporation Political Activities Policy**

Adopted by the Board of Directors, February 2004

It is the policy of Exxon Mobil Corporation to refrain from making contributions to political candidates and political parties, except as permitted by applicable laws and authorized by the Board of Directors.

It is the Corporation's policy to communicate information and views on issues of public concern that have an important impact on the Corporation.

The Corporation considers that registering and voting, contributing financially to the party or candidate of one's choice, keeping informed on political matters, serving in civic bodies, and campaigning and officeholding at local, state, and national levels are important rights and responsibilities of the citizens of a democracy.

Directors, officers, and employees engaging in political activities are expected to do so as private citizens and not as representatives of the Corporation. Personal, lawful, political contributions and decisions not to make contributions will not influence compensation, job security, or opportunities for advancement.

# **Exxon Mobil Corporation Political Activities Guidelines**

Adopted by the Board of Directors, February 2006 Amended by the Board of Directors, February 2010

# **Political Contributions**

#### **United States**

In the United States, the Corporation is authorized to make lawful political contributions to political parties, political associations, candidate committees, and other political organizations, provided that such contributions are approved by the Chairman of the Corporation or his designees.

The President of the Corporation and Vice President – Public and Government Affairs are empowered to authorize lawful campaign contributions in Louisiana.

Budgets and procedures for all political contributions should be approved by the Chairman. All political contributions should be made by check or other fully auditable method of payment and should be recorded in the accounts of the Corporation and reported publicly in compliance with governing law.

#### Other Nations

The Corporation refrains from making political contributions in any nation other than the United States.

#### Affiliated Companies

No affiliated company, other than Imperial Oil Limited, is authorized to make any political contribution. No exception is taken to Imperial Oil Limited's policy permitting lawful corporate political contributions, provided the budget for such contributions is reviewed by the Chairman of Exxon Mobil Corporation.

# **The Corporation's Political Action Committees (PACs)**

With the approval of the Chairman, the Corporation is authorized to establish political action committees in the United States. Affiliated companies of the Corporation are not authorized to establish political action committees.

In the United States, a political action committee, or PAC, is the name commonly given to a private legal entity formed to raise funds and make contributions to the campaigns of political candidates through the voluntary contributions of employees, shareholders or other individuals.

The Corporation is authorized to use corporate funds for lawful administrative expenditures on behalf of company-sponsored political action committees.

## **Review with the Board of Directors**

The political contributions of the Corporation and Imperial Oil Corporation, as well as the contributions of PACs established by the Corporation, should be reviewed with the Board of Directors of the Corporation, preferably at least annually.

## **Other Political Action Committees**

The Corporation opposes the creation of a political action committee by an outside organization or a joint venture of which the Corporation is a member.

The Corporation and each affiliated company should stay informed about the activities of organizations, including trade or other associations, and joint ventures in which it is a member. If any such organization or joint venture proposes to establish or support a PAC, the Corporation or affiliate is expected to oppose it and, should efforts in this regard be unsuccessful, promptly review the matter, including alternative courses of action available to the Corporation or the affiliate, with the Chairman or his designees.

No expenditure of corporate funds should be made to a political action committee created by an organization of which the Corporation is a member for the purposes of underwriting the administrative or other expenses of such a political action committee. The Board of Directors recognizes that in some instances it may be impracticable to require that such an organization separate its accounts so as to identify administrative costs and, therefore, corporate funds, in effect, will be used indirectly to cover some administrative expenses. No such political action committee may be authorized to solicit contributions from employees, shareholders or annuitants of the Corporation or its affiliates without prior approval by the Chairman.

## **Honoraria**

The Corporation refrains from making the lawful expenditure of corporate funds for the payment of honoraria to government or other officials who are invited to speak to employees at company-sponsored meetings, except to the extent specifically approved by the Chairman or his designees. Such honoraria should clearly represent, and be limited to, payments for the services rendered in making such an address.

# **Propositions and Referenda**

Corporate funds may be used to communicate information and views regarding propositions or referenda to be submitted to voters which would have an important impact on the business of the Corporation or its affiliates. No such use of corporate funds should be made by the Corporation or the affiliated companies without the prior review by the Chairman or his designees, either individually or in the form of a budget or a program of expenditures.

# **Employee Activities**

At the request of the Corporation, certain employees may act on behalf of the Corporation to execute the political activities of the Corporation. Employees engaging in political activities as private citizens should avoid appearing to be acting as representatives of the Corporation.