



Moody's Political Engagement and Public Policy Statement

Moody's (NYSE: MCO) is a global integrated risk assessment firm that empowers organizations to make better decisions. Moody's data, analytical solutions, and insights help decision-makers identify opportunities and manage the risks of doing business with others. We believe that greater transparency, more informed decisions, and equity around information access open the door to shared progress.

As a responsible corporate citizen, Moody's engages globally on public policy matters that impact our business, employees, customers, and other stakeholders.

ADVOCACY, LOBBYING, POLITICAL CONTRIBUTIONS & EXPENDITURES

Moody's Government Public and Regulatory Affairs (GPRA) team, which is part of Moody's Global Corporate Affairs team, manages the Company's political and public policy activities, including direct engagement with government officials and indirect engagement through trade associations and other policy influencers. The head of Moody's Global Corporate Affairs is a member of Moody's Executive Leadership Team with a direct reporting line to the President and CEO. Moody's Board of Directors receives periodic updates on Moody's public policy engagement and advocacy activities.

GPRA represents the Company's interests before government bodies globally and regularly provides views and factual information to public officials on matters that impact our business and stakeholders. Our GPRA professionals are expected to demonstrate the highest ethical and professional standards.

Moody's has clear internal policies and compliance procedures that govern the Company's adherence to all relevant legal and regulatory requirements. Moody's complies with all applicable lobbying disclosure laws. In the U.S., the Company files lobbying disclosure reports with the U.S. Federal government and contracts with external lobbyists, who make public disclosures as required. Moody's files with state authorities where appropriate.

Moody's prohibits the use of corporate funds to support any political candidates, political parties and committees (including Super PACs), ballot initiatives, section 527 entities, and to make political contributions to 501(c)(4) organizations. Moody's does not maintain a political action committee (PAC), and does not use corporate funds for electioneering communications or independent expenditures. The company does not currently engage in grassroots lobbying.

TRADE ASSOCIATIONS

Moody's is a member of industry trade associations that represent the business community and advocate on a variety of important public policy matters that impact our business and our stakeholders. The associations provide venues for policy discussions and opportunities for advocacy on common areas of interest. We may not support every policy position held by a trade association of which we are a member, and we communicate our views as needed. Before engaging with trade associations and similar groups, Moody's Investors Service (MIS) employees are required to attend training that is designed to reinforce MIS's independence as a credit rating agency.

EMPLOYEES' POLITICAL ACTIVITIES

The importance we place on maintaining the independence of MIS extends to our policies governing employee participation in the political process, which are outlined in Moody's [Code of Business Conduct](#). Moody's encourages its employees to participate in both political activities and the political process — this is, however, completely voluntary, must be done on an employee's own time (i.e., outside of working hours), and must not imply that an employee is acting on behalf of the Company. Activities may not involve the use of Moody's funds, personnel time, equipment, supplies, or facilities. Employees' personal political contributions are not reimbursed by the Company.

Any suspected violations of these rules or any other provisions of Moody's Code of Business Conduct are to be reported to Legal, Compliance or via Moody's Integrity Hotline.

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