

BROADRIDGE FINANCIAL SOLUTIONS, INC.

Political Contributions Policy

The Political Contributions Policy (the “Policy”) governs the political contributions and activities of Broadridge Financial Solutions, Inc. and its subsidiaries (the “Company” or “Broadridge”). This Policy has been adopted by the Company’s Board of Directors and is designed to advance the Company’s business and stockholder interests, promote transparency with the public and promote compliance with applicable laws, as well as the Company’s Code of Business Conduct and Ethics.

1. Background and Philosophy

The Company believes it is in the best interests of the Company and its stockholders to engage constructively and responsibly in the public policy and political process to advance and protect the long-term interests of the Company. Therefore, we participate in the development of public policy that addresses issues affecting our industry, business, products, clients, associates and communities. We do so in various ways, including educational outreach to elected officials on key public policy issues related to the Company’s business, facilitating voluntary political giving by eligible Broadridge associates¹ and directors through the Broadridge Financial Solutions Political Action Committee (the “Broadridge PAC”) and membership in trade associations that help to advance our business objectives. The Company’s political activities and related spending reflects the interests of the Company and its stockholders, and not those of any individual director, officer or associate.

2. Political Activities of Associates

While the Company values the rights and responsibilities of its associates to participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Associates engaging in political campaign activities are expected to do so solely as private citizens and must at all times make clear that their views and actions are their own, and not those of the Company. Associates may not use their position with the Company to coerce or pressure other associates to make political contributions or expenditures to, or support or oppose, any political candidates, elections or ballot initiatives.

Associates engaging in political activities must adhere to this Policy and the applicable provisions of the Company’s Code of Business Conduct and Ethics.

¹ References in this Policy to associates are to Broadridge’s employees.

3. Broadridge PAC

The Company provides an opportunity for certain eligible associates and directors to voluntarily participate in the political process by contributing to the Company's bipartisan political action committee, the Broadridge PAC. The Broadridge PAC allows eligible associates and directors to pool their financial resources to support political candidates, campaigns and committees in furtherance of the best interests of the Company and its stockholders and associates.

The Broadridge PAC has its own oversight body within the Company and is funded solely from voluntary contributions made by eligible associates and directors. Contributions may not be secured by the use or threat of physical force, job discrimination or financial reprisal. No corporate funds are used by the Broadridge PAC. All Broadridge PAC contributions are made in a legal, ethical and transparent manner in accordance with federal laws and regulations governing political action committees. Non-U.S. nationals without permanent resident status are prohibited by federal law from contributing to, and participating in the governance, of the Broadridge PAC.

The Broadridge PAC treasurer manages all contributions in accordance with federal law and the Broadridge PAC governing documents. All contributions to and by the Broadridge PAC are fully and publicly disclosed in reports filed with the Federal Election Commission and can be viewed on the website of the Federal Election Commission.

4. Political Contributions

No Company resources, including the use of Company premises, equipment or property, or Company funds, may be contributed (in cash or in-kind) to any federal political candidate, political committee (other than for the administrative and solicitation expenses of the Broadridge PAC, as permitted by law), political party, state ballot measure committee or to any other organization for the purpose of attempting to influence elections or ballot measures. Broadridge associates may make *de minimis* use of Company equipment or property such as computers (if its use does not raise Company overhead) for volunteer political activity (*e.g.*, sending or forwarding an invitation by email to a fundraising event).

Additionally, it is the Company's policy to not make contributions to Internal Revenue Code section 501(c)(4) social welfare organizations.

The Company may, however, from time to time make a limited number of corporate political contributions at the state or local level where permitted by law and approved in advance by the Company's Chief Executive Officer, or in his absence, the General Counsel. This includes corporate contributions to state candidates and political action committees in areas where the Company has a significant presence.

The Company is committed to complying with all federal, state and local laws and related regulations regarding the use of corporate resources in connection with federal, state and

local election for political office or ballot initiative. To that end, all political contributions and expenditures made by the Company must comply with the Foreign Corrupt Practices Act, all other applicable laws and regulations in the jurisdictions in which the contributions are made, this Policy and the applicable provisions of the Company's Code of Business Conduct and Ethics.

5. Lobbying

The Company engages in lobbying, or advocacy, in the United States at both the federal and state levels to advocate our positions on issues that affect the Company, our industry, business, products, clients, associates and communities. We have a responsibility to our clients, associates, communities and stockholders to represent their interests in public policy discussions that impact our business.

The Company's General Counsel is primarily responsible for implementing the Company's political activities, including development and advocacy of public policy, lobbying and outreach to other third-party organizations on public policy issues of concern to the Company.

The Company's General Counsel coordinates with relevant business units and functional departments to identify and prioritize public policy issues that are important to the Company. Key issues are reviewed by senior management and the Board of Directors, as appropriate.

While the Company itself is not a registrant under the federal Lobbying Disclosure Act ("LDA"), it does retain lobbying firms to engage public officials on its behalf, whose identities, LDA registrations and reports are [publicly available](#).

6. Participation in Trade Associations

The Company's participation in the political process is designed to promote and protect the interests of Broadridge and its stockholders and associates, and we maintain memberships with a variety of trade associations for that purpose. Participation as a member of these associations does not mean we always agree with the positions, views or objectives of the organizations or those of other members, although we closely monitor the appropriateness and effectiveness of the political activities undertaken by the most significant trade associations of which we are a member.

7. Compliance

The Company is committed to complying with all federal, state and local laws and related regulations regarding the reporting requirements for political contributions and expenditures. Failure to comply with any applicable laws and regulations governing political activities subjects the individual and the Company to potential civil and criminal penalties. Failure to comply with this policy subjects an associate to disciplinary action, up to and including termination of employment.

8. Review, Amendments and Disclosure regarding Political Contributions

The Board of Directors will review from time to time but no less than annually: (1) Broadridge PAC spending and corporate expenditures to influence public policy and dues and other contributions to trade associations and (2) Broadridge lobbying priorities and activities. In addition, this Policy is reviewed periodically by the Board of Directors, and any amendments hereto must be approved by the Board. Broadridge will make certain disclosures regarding its political contributions on its website at www.broadridge.com that it will update from time to time but no less frequently than annually.

Adopted by the Board of Directors on September 1, 2020