

Intuit Political Accountability Policy

Approved October 31, 2018

Introduction and Purpose

Intuit is committed to being a responsible and respected corporate citizen and a global thought leader in our engagement in the external public policy process in the countries where we have employees, products and services, and where public policy affecting our business is created. Our engagement is covered by our Code of Conduct and at all times reflects the principles of Intuit's Corporate Values, beginning with Integrity Without Compromise.

We believe encouraging the development of sound public policy is an important element of good corporate global citizenship so that we can better serve our customers, employees, and shareholders. Our goal is to:

- Encourage a positive public policy environment that can advance Intuit's strategic business objectives and enables us to provide innovative products and services to our customers;
- Anticipate external public policy challenges and opportunities, and drive strategies to create business advantage and mitigate risk;
- Engage in the public policy community to promote an external environment that supports business growth, operational efficiencies and cost minimization; and
- Educate and support policy makers who share our vision of responsible protections for individuals and small businesses, balanced with a free and fair competitive marketplace, where digital innovation can flourish and economies can grow.

Intuit transparently participates in all aspects of the public policy process including educating agencies and elected officials on our policy positions and their impact to consumers and small businesses, and supporting candidates whose business public policy issue positions align with Intuit's corporate policy interests. Intuit is non-partisan; we participate across the spectrum and believe the best policies that serve the public interest and common good usually represent a thoughtful balance and tend to be forged in the political center through a bipartisan, collaborative political process, an area of focus for Intuit.

We interact with a comprehensive suite of thought leaders across the political spectrum who help shape public opinion and policy. As part of that process Intuit may share information with legislators, regulators, think tanks, trade associations, policy groups, academic institutions, foundations, other non-governmental organizations and the public via testimony, position papers, public statements, etc.

This Policy contains the principles we created in the following areas to guide our practices and activities to both ensure compliance with all applicable laws, but also to provide for integrity, accountability, and transparency in all we do, including:

- Process and Accountability
- Political Contribution Criteria
- Transparency
- Employee Participation
- Oversight and Compliance

Process and Accountability

Intuit and our employees participate in the political process in three ways: as individuals, through the Intuit Political Action Committee in the United States, and via corporate contributions where allowed by law, and in a manner compliant and consistent with regulation. All employee participation is voluntary.

In addition, Intuit also engages in lobbying activities, and the costs associated with such activities are reported as provided by applicable federal, state and local laws.

All corporate political contribution requests received by Intuit are reviewed by Corporate Affairs; contributions that are strategic and meet the guidelines of this policy are approved by the Corporate Affairs Director or Vice Presidents of National or State Government Relations respectively, and by the Senior Vice President of Corporate Affairs/Chief Public Policy Officer. Political activity outside the United States is governed by this policy and is conducted with the strictest adherence to the U.S. Foreign Corrupt Practices Act and Intuit's Code of Conduct, both of which are the subject of required training for employees.

In the United States Federal law does not permit direct corporate contributions to candidate campaigns for Federal office or national party committees. However, under the Federal Election Campaign Act of 1971, as amended, companies are allowed to participate in the Federal political process in defined ways:

- Companies may establish Federally regulated Political Action Committees (PACs), which are funded through voluntary contributions from eligible employees. Such PACs may contribute to the political campaigns of candidates for Federal office, national party committees, and other Federal PAC's, and are subject to full reporting and disclosure requirements with the Federal Election Commission. In 2000 Intuit created its employee PAC, The Intuit 21st Century Leadership Fund. At this time, Intuit does not have a State PAC.
- Under the U.S. Supreme Court's *Citizens United* decision, corporations may contribute unlimited funds to Independent Expenditure Committees for or against political candidate campaigns; however, Intuit does not contribute

corporate dollars to such committees. If we make a direct or in-kind contribution to other types of Independent Expenditure Committees, such as those at the state or local level that concern ballot measures, then the contribution will be disclosed.

State laws vary but many do allow corporations to lawfully make contributions to candidate campaigns for State or Local office, Political Parties, and organizations that engage in political activity and ballot measures. Consistent with law and regulation, including individual State contribution limits and reporting requirements, Intuit may selectively make such contributions, and will disclose any and all such direct and in-kind political contributions.

Intuit adheres to all laws and regulations governing political campaign contributions at the Federal, State, and Local levels. We do not favor any particular political party or ideological point of view, and we do not take into account any private, personal political preferences of company officers and executives. We focus our support decisions on strategic judgments related to how best to further Intuit's positions on strategic business policy issues that matter to the success of the enterprise.

The Intuit 21st Century Leadership Fund PAC Committee and the State Corporate Donation Committee, each comprised of representatives of Intuit's major businesses and functional groups, respectively meets at least once per year to review contribution policies, set goals for the year and pre-approve a list of candidates eligible for contributions. Final contribution decisions, based upon the pre-approved list, are approved and implemented by the Corporate Affairs Director or Vice President of Government Relations and the Senior Vice President of Corporate Affairs/Chief Public Policy Officer.

Political Contribution Criteria

Intuit's giving is non-partisan and/or bi-partisan and uses the following criteria to guide our political contribution choices:

- Representation of a district of importance to Intuit
- Policy position(s) of importance to Intuit and/or the customers that we serve
- Leadership role in government or position on relevant legislative committees
- Strong or emerging relationship with high-tech industry
- Nature of the opposition/competitive environment
- Financial need of campaign for electoral success

We recognize that given the complex nature of politics there may be times when a candidate or organization supports positions that align with most but not all of our policy interests and in those cases we make our choices based on political judgments on the issues that have the greatest impact to our company.

Transparency

We comply with the spirit and letter of all Federal and State laws governing political contributions and their reporting and disclosure requirements. In the United States our PAC contributions are publicly disclosed to the Federal Election Commission (www.fec.gov) and state contributions are publicly disclosed on corresponding State Web sites; all contributions are aggregated and published on Intuit.com semi-annually. This includes all direct or in-kind payments in response to explicit solicitations for a political contribution, an electioneering communication, or an independent expenditure. Intuit will disclose these payments, regardless of whether the solicitations are from a political party, political action committee, or politically active tax-exempt organization, such as one organized under Internal Revenue Code (IRC) section 501(c) 4 or section 527, as defined by applicable laws.

Any other payments Intuit may make to IRC 527 organizations are electronically reported on IRS Form 8872 by those organizations, and can be found on the IRS Web site ([link](#)). We comply with all Federal and State lobbying and reporting requirements and regulations, and our Federal reporting is publicly disclosed on the Lobbying Disclosure Act (LDA) website of the US Congress ([link](#)).

We pay dues to various trade associations that are organized under section 501(c)(6) of the Internal Revenue Code. These organizations help Intuit to further our public policy goals and desired business outcomes, and we review these memberships annually. For such organizations to which our dues payments are \$25,000 or greater, each year Intuit inquires and makes reasonable efforts to obtain information on what portions of our dues payments may be used for association lobbying expenditures or political contributions as defined by section 162(e)(1) of the Internal Revenue Code. Intuit publishes the information annually that these associations provide to us.

Finally, we annually post, on Intuit's internal and external Web sites, our Political Accountability Policy and a summary of Intuit's positions on public policy issues of import to the corporation.

Employee Participation

Intuit will not reimburse anyone for a political contribution or expenditure. And unless directly authorized in advance by the Senior Vice President Corporate Affairs/Chief Public Policy Officer, and applicable by law, Intuit employees may not offer or make contributions, expenditures, or assistance on behalf of Intuit in connection with public elections or political campaigns.

Intuit encourages personal participation by its employees in the civic and political process of their country outside of working hours. However, employees' political efforts, including but not limited to helping elect candidates to office or holding an appointed or

elected position themselves, must be on a purely personal basis and may not in any way imply that such activities are conducted on behalf of, or have the endorsement of, Intuit. Employees with questions or who have been approached to hold or seek a position representing Intuit should seek guidance by submitting an inquiry to Senior Vice President Corporate Affairs/Chief Public Policy Officer via the Ethics & Compliance Program Office.

Employees shall not use their positions or titles with Intuit in their personal political activities nor shall they use corporate stationery, addresses, facilities, resources or Intuit property for any political activity, unless such activities are authorized in advance by the Senior Vice President Corporate Affairs/Chief Public Policy Officer and are permissible under applicable law and regulation.

Solicitation for personal political causes is prohibited in the workplace or on Intuit property in accordance with Intuit's Distribution and Non-solicitation policy.

In the United States, any Intuit employee who is a National Citizen or has a Green Card may voluntarily choose to participate in the Political Action Committee, the Intuit 21st Century Leadership Fund; federal law prohibits foreign nationals from making contributions in connection with any federal, state or local election, including involvement with the administration of the federal PAC. The universe of eligible employees invited to participate may vary from time to time based on management judgment.

Oversight and Compliance

This policy is reviewed and approved annually by Intuit's Board of Directors and the Nominating and Governance Committee of Intuit's board.

Annually the Nominating and Governance Committee reviews and provides oversight to an annual report of the Company's corporate and PAC political candidate contributions, lobbying allocations and trade association memberships. A Political Accountability Management Committee, comprised of the General Counsel, Chief Financial Officer, Executive Vice President of Strategic Partnership Group and Chief Public Policy Officer, biannually reviews all political candidate contributions made, trade association memberships, lobbying and participation with issue analysis and policy research groups.

Finally, Intuit ensures this policy is complied with, including having expert outside counsel and an independent compliance organization review and approve all Intuit 21st Century Leadership Fund and corporate political giving activities and verify all compliance filings, and reporting. The Corporate Affairs department is regularly subjected to an Internal Audit review.