



VERISIGN®

## POLITICAL CONTRIBUTIONS POLICY

**Effective Date:** June 30, 2025

**Version:** 2.0

**Owner:** Compliance Officer

**Department:** Law Department

**Review Cycle:** 3 years

### 1. Purpose

The purpose of this Policy is to establish the Company's general prohibition against political contributions by the Company to candidates, political parties, campaign committees, and political action committees (PACs) globally.

### 2. Scope

This Policy applies to all employees, non-employee workers, and directors of VeriSign, Inc. and its subsidiaries or affiliates (collectively, "Verisign" or the "Company").

### 3. Definitions

- **Charitable Contribution** – Any monetary or non-monetary gift to a non-profit organization that is organized subject to Section 501(c)(4) of the U.S. Internal Revenue Code, or other similar tax exemption laws or regulations around the world, for the purpose of promoting social welfare and whose income is devoted exclusively for charitable, educational, or recreational purposes. Contributions to 501(c)(3) organizations and equivalent non-U.S. organizations are not within the scope of this Policy.
- **Electioneering** – Engaging in efforts for the purpose of seeking to influence the outcome of governmental elections or ballot measures. A Political Contribution (as defined below) is a form of Electioneering activity.
- **Political Contribution** – Any monetary or in-kind contribution to a political candidate, government officeholder, political campaign, campaign committee, political party, political committee, special interest organization operating under Section 527 of the U.S. Internal Revenue Code (*i.e.*, a SuperPAC or Independent Expenditure Committee), ballot committee, or any similar organizations for Electioneering purposes, or a direct independent expenditure for Electioneering purposes. A Political Contribution is not limited to a monetary payment or donation, but is also giving anything of value, including but not limited to:
  - gifts, loans, advances, or deposits of cash or any asset of value;
  - use of facilities and resources (such as conference rooms, personnel, email, postage, use of corporate name or logo, mailing or contact lists, vendor

## VERISIGN, INC.

- discounts, photocopiers, telephones, computers, supplies, or other similar office assets);
- a contract, promise, or agreement to contribute (whether express or implied and, whether or not, legally enforceable);
- the payment of compensation for personal services of another person which are rendered to any candidate or political party or political organization without charge or at a discount; or
- the provision of personal services.

### 4. Policy

#### a. Company Political Contributions

No Political Contributions shall be made with the Company's funds, assets, or resources, regardless of whether the contribution is legal under the laws of the country or jurisdiction in which it is made. Lobbying expenditures globally, including at the local, federal, or national levels, are not within the definitions of Political Contributions or Electioneering for purposes of this Policy.

#### b. Payments and Contributions to 501(c)(4) and Similar Tax Exempt Organizations and Trade Associations

- i. The Company belongs to and pays membership dues to various trade associations. The Company may also make Charitable Contributions to certain tax-exempt organizations. The Company's payments and contributions to these organizations are not made for the purpose of supporting any Electioneering activities or purposes.
- ii. Every three years, the Company must seek to obtain one of the following confirmations from each such 501(c)(4) and similar tax-exempt organizations receiving a Charitable Contribution from the Company or from each such trade association receiving \$25,000 or more from the Company in a calendar year:
  - A. An affirmative statement confirming that the organization does not engage in Electioneering activities. This affirmative statement may be included in the terms of the agreement with the organization or on the invoice or receipt from the organization related to the payment or contribution.
  - B. To the extent any such organization is engaged in Electioneering activities, an affirmative statement confirming that Verisign's payments or contributions shall not in whole or in part be used for such Electioneering activities.
- iii. If the Company determines that any such organization is engaged in Electioneering activities, whether or not Verisign's funds are used for such purposes, the Chief Executive Officer (CEO) and General Counsel (GC) must approve any continued contributions or payments to such organization.
- iv. In the event any portion of the Company's Charitable Contributions or trade association payments is used by the recipient organization for Political Contributions or other Electioneering activities, in line with this Policy, the Company will ask each such

## **VERISIGN, INC.**

organization to provide a written statement stating the portion of the Company's contributions or payments used for Political Contributions and Electioneering activities.

### **c. Reporting**

On a semi-annual basis, the GC shall deliver a report to the Corporate Governance and Nominating (CG&N) Committee of any Political Contributions made during the prior six months, including, if possible, the portion of any trade association membership dues to any trade association receiving \$25,000 or more in the calendar year and any organizations receiving Charitable Contributions that were used for Political Contributions. The Executive Leadership Team member responsible for each relevant Charitable Contribution or trade association membership must provide to the GC all information needed to prepare the semi-annual reports for the CG&N Committee. The Company will also publish to its website a report of the Company's Political Contributions during the period.

### **d. Personal Political Activity**

While the Company values the rights and responsibilities of its employees, non-employee workers, and directors to participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Those engaging in Electioneering activities must not do so during or as part of the performance of their duties to the Company, or in or with Company facilities or resources, and at all times must make clear that their views and actions are their own, and not those of the Company. Employees, non-employee workers, and directors may not use their positions with the Company to coerce or pressure others to make political contributions or expenditures to, or support or oppose, any political candidates, elections, or ballot measures.

Any personal Political Contributions, Electioneering, or other political activity must not be done in such a way that suggests it is on behalf of or approved by the Company. Employees, non-employee workers, and directors must comply with the Acceptable Use Policy and the Social Media and Internet Postings Policy when engaging as individual citizens in political activity, including refraining from using corporate email addresses. Consult the Code of Conduct, the Avoiding Conflicts of Interest Policy, and the Anti-Corruption Policy before engaging in any activities with government officials or political organizations, whether on behalf of the Company or in a personal capacity. Approvals and reviews required by this Policy are in addition to any approvals and reviews required by other Company policies, including the Authority for Entering into Company Commitments (AECC) Policy.

## **5. Policy Review**

Verisign reserves the right to review, amend, modify, or suspend this Policy in its sole discretion at any time.

## **6. Failure to Comply**

Any employee who fails to comply with this Policy may be subject to disciplinary action, up to and including termination.

## **7. Exceptions**

If an employee believes specific circumstances warrant an exception to this Policy, a written request for the Company to make a Political Contribution must be submitted to and approved by the CEO and the GC before any such Political Contribution can be made.

## **8. Related Documents**

- Anti-Corruption Policy
- Avoiding Conflicts of Interest Policy
- Authority for Entering into Company Commitments Policy (AECC)
- Global Expense Reimbursement Policy
- Acceptable Use Policy
- Social Media and Internet Postings Policy