# Political Activities Statement

## Overview

An important aspect of M&T's[1] community commitment is our active participation in the political and public policy process, educating and advocating in support of sound policies that support not just our business but our customers, employees, shareholders, and communities.

M&T is subject to the requirements of federal, state, and local laws and regulations on political contributions, gifts to and entertainment of public or government officials, political action committees, lobbying, and participation in political activities. M&T has adopted policies and procedures designed to ensure that it complies with such requirements. Decisions on M&T's political activities are made without regard for the personal political preferences of any employee.

## Corporate Political Contributions

M&T does not contribute corporate funds to political campaigns, parties, and committees; or to federal, state, or local initiatives advancing election campaign and ballot issues. Additionally, M&T does not make independent expenditures.

## Trade Associations and Industry Groups (Business Leagues)

M&T is a member of several trade associations and other industry groups (i.e., 'business leagues'), which are federally tax exempt and organized under Section 501(c)(6) of the Internal Revenue Code. These groups may engage in political activities or make political contributions to federal and state candidates and political committees. Business leagues take a wide variety of positions on many political matters, not all of which M&T supports.

## 501(c)(4) Organizations

M&T makes non-political contributions to organizations organized under Section 501(c)(4) of the Internal Revenue Code, which are federally tax exempt, social welfare organizations. M&T may occasionally support these 501(c)(4) organizations on public policy matters but generally does not contribute to 501(c)(4) organizations for electoral purposes.

## Political Action Committee

M&T participates in the political process through bipartisan contributions from the M&T Bank and Wilmington Trust Political Action Committee (M&T PAC). The M&T PAC allows eligible M&T officers and employees to voluntarily pool their resources to support candidates for public office. The M&T PAC does not make contributions to candidates running for President. M&T provides non-monetary support to the PAC (e.g., systems and personnel), but does not use corporate funds to make political contributions directly or indirectly through the PAC.

## Lobbying

M&T expresses its views on public policy matters to elected officials and regulators at various levels of government. It employs registered in-house and contract lobbyists and maintains memberships with business leagues to monitor legislative and regulatory activities and to advocate on behalf of policies that support M&T's mission, values, and strategic plan. M&T lobbyists are subject to strict laws and regulations, including federal and state reporting provisions. M&T directors, officers, and employees are not permitted to lobby on behalf of the organization without authorization from the Government Relations Department (Government Relations).

[1] M&T refers to M&T Bank Corporation and its subsidiaries and affiliates

## Political Activities Governance

Governance structures are in place to promote compliance with federal, state, and local laws and regulations on political contributions, gifts to and entertainment of public or government officials, political action committees, lobbying, and participation in political activities.

The M&T Bank Government Relations Policy ("Policy") sets forth the basic principles governing M&T's political engagement. The Policy is maintained by Government Relations, which manages all corporate political activities conducted by or on behalf of M&T. The executive Chief Corporate Affairs Officer provides oversight of Government Relations and its policies and practices.

Mandatory political activities training is conducted for all employees when hired and annually thereafter.

## Disclosure Practices

In the **M&T Bank Corporation Political Activities Report** posted on its corporate website, M&T annually discloses relevant contributions and expenditures.

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*The information included in this statement is current as of the date of publication and is subject to change without notice. Forward-looking statements speak only as of the date made, and we do not undertake to update them to reflect changes or events that occur after that date.*