
Political Engagement

As a leading global financial institution for over 230 years, BNY Mellon has a unique voice and perspective to bring to the policy and political process. Laws and regulations have significant impacts on our businesses, markets, clients, employees, shareholders and communities. We are committed to working constructively with policymakers and market participants as we move the financial services industry forward. Certain of our employees engage through the PAC program, trade associations, and other voluntary activities in accordance with applicable laws, regulations, and internal policies and procedures.

Employee-Funded Political Action Committees

BNY Mellon has two Political Action Committees (PACs) funded entirely by voluntary contributions from eligible employees. Employees are not reimbursed or compensated in any way for political activities or contributions.

PAC contributions are bipartisan and made in accordance with PAC By-Laws and contribution guidelines. Contribution guidelines include the member's participation in committees of jurisdiction, representation of communities where BNY Mellon has a presence, leadership positions, and civility and respect for democratic processes.

PACs are regulated by the Federal Election Commission (FEC) and relevant state election commissions. Reports filed with the FEC are available to the public at www.fec.gov and with state election commissions available [[HERE](#)].

BNY Mellon does not make corporate contributions to the employee funded PACs or other political organizations¹

Corporate Contribution Reports

- [January-December 2021 Corporate Contributions](#)

- [January-December 2020 Corporate Contributions](#)
- [January-December 2019 Corporate Contributions](#)
- [July-December 2018 Corporate Contributions](#)
- [January-June 2018 Corporate Contributions](#)
- [July-December 2017 Corporate Contributions](#)
- [January-June 2017 Corporate Contributions](#)
- [July-December 2016 Corporate Contributions](#)
- [January-June 2016 Corporate Contributions](#)
- [July-December 2015 Corporate Contributions](#)
- [January-June 2015 Corporate Contributions](#)

Corporate contributions prior to 2015 can be found in our [annual Enterprise ESG/CSR reports](#).

PAC Contribution Reports

- [2021 PAC Contributions](#)
- [2020 PAC Contributions](#)
- [2019 PAC Contributions](#)
- [2018 PAC Contributions](#)
- [2017 PAC Contributions](#)
- [2016 PAC Contributions](#)
- [2015 PAC Contributions](#)
- [2014 PAC Contributions](#)

PAC contributions prior to 2014 can be found in our [annual Enterprise ESG/CSR reports](#).

Federal Lobbying Disclosure Reports

Reports can be found [here](#). Total spend is also reported in our annual Enterprise ESG/CSR reports.

Trade Associations

BNY Mellon is a member of numerous trade associations on issues of interest to the financial industry and general business community. These trade associations help build consensus, coordinate advocacy, and produce industry analysis and best practices. We regularly review our memberships for alignment with our priorities, and we may not always agree with an association's or its members' positions or priorities. We ask trade associations not to use our membership fees to fund federal, state, or local level election-related activity, including contributions and expenditures to support or oppose any candidate for any office, political party committee, or political committee.

Our principal trade association memberships include:

- American Bankers Association
- Association of Global Custodians
- Bank Policy Institute
- Belgium Febelfin
- Business Roundtable
- Chamber of Digital Commerce
- Financial Services Forum
- Global Financial Markets Association, including its regional trade association members AFME, ASIFMA, GFXD and SIFMA
- Institute of International Finance
- International Swaps and Derivatives Association
- Investment Company Institute
- Loan Syndication and Trading Association
- Managed Funds Association
- New York Bankers Association
- Partnership for New York City
- Pennsylvania Bankers Association
- Risk Management Association
- Structured Finance Association
- The Clearing House
- TheCityUK
- UK Finance

Compliance and Oversight

The BNY Mellon Public Policy and Government Affairs team is responsible for all political activity by or on behalf of BNY Mellon, including administration of the PACs. The Public Policy and Government Affairs team reports to the General Counsel and provides updates at least annually to the **Corporate Governance, Nominating and Social Responsibility Committee** of the Board of Directors. These activities are conducted in accordance with BNY Mellon's Code of Conduct, internal policies and procedures, applicable laws and regulations, and in consultation with the Compliance and Legal Departments.

We encourage our employees to stay informed of political issues and candidates and to take an active interest in policy and political affairs. Employees may participate in the political process by making voluntary contributions on their own behalf or engage in personal political activities in accordance with applicable federal and state laws and regulations, the Code of Conduct, and internal policies and procedures.

Employees are not reimbursed or compensated in any way for attending political events, engaging in political activities, or making political contributions. Employees engaging in political activities must do so on their own time and with their own resources. Our Compliance Department reviews all individual employee contributions that may be affected by federal, state, or local “pay-to-play” laws. These laws limit the ability of corporations to compete for business if certain employees or their immediate family members have made contributions to officials who have the authority to award business or other individuals as set forth in the applicable laws.

¹ A gift, subscription, loan, advance, or deposit of money or anything of value given to influence a federal election; or the payment by any person of compensation for the personal services of another person if those services are rendered without charge to a political committee for any purpose. 11 CFR 100.52(a) and 100.54

Corporations and labor organizations may not use their general treasury funds to make contributions to their separate segregated funds or candidates and they are generally prohibited from using their treasury funds to make contributions to other types of political committees. 11 CFR 114.2(b).

[Read our Enterprise ESG Disclosure](#)

Want to get in touch to find out more about BNY Mellon?

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