Corporate Political Expenditures Related Disclosures

Mattel’s Code of Conduct makes reference on page 37 to political activity. Excerpt below:

"Mattel’s assets should not be used to support any political campaign or any other political activity, without the prior approval of the Government Affairs Department. This includes the use of Mattel’s facilities, office equipment, supplies, inventory and even our own work time.

Political activities by corporations, including lobbying, are regulated and must be reported under U.S. law and under the laws of many countries where Mattel does business. To avoid any inadvertent violation of those laws, all political and lobbying activities should be discussed and coordinated with the Government Affairs Department and the Law Department.

Mattel is committed to citizenship and community involvement, and encourages employees to contribute their time and support to candidates, parties and civic organizations. However, our individual involvement must be totally voluntary and must be on our own time and at our own expense."

In 2020, Mattel made no corporate political expenditures, which are defined as follows:

a) Contributions to political candidates, parties and committees in the U.S.;
b) Payments to organizations organized under Section 527 of the Internal Revenue Code (IRC);
c) Independent political expenditures made in direct support of or opposition to a campaign in the U.S.; and
d) Political expenditures in the form of contributions, dues or payments to organizations organized under Section 501 (c) (4) or Section (c) (6) of the IRC where such expenditures exceed $50,000, as identified by the organization or association.

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