



BXP, Inc. – Policy on Company Political Spending

1. Unless approved as provided below, the Company’s policy is that the Company shall not:
 - contribute to or make expenditures on behalf of, or make direct independent expenditures concerning, any federal, state or local candidates for election, referendas or initiatives,
 - contribute to or make expenditures on behalf of political parties,
 - contribute to or make expenditures on behalf of political committees or other political entities organized and operating under 26 U.S.C. Sec. 527 of the Internal Revenue Code,
 - contribute to any charity or non-profit organization at the request of any federal, state or local governmental office holder or any candidate for such an office,
 - donate Company time, resources, products or services to any of the foregoing; and
 - pay for advertisements, printing or other campaign expenses.

For purposes of this Policy, each of the foregoing shall constitute “Company Political Spending.”

2. Any proposed Company Political Spending must be submitted to the Company’s Chief Legal Officer for prior written approval. The Company’s Chief Legal Officer shall consult with the Chief Executive Officer and President to determine if the proposed Company Political Spending is consistent with this Policy.
3. All Company Political Spending approved by the Chief Legal Officer shall promote the interests of the Company and shall be made without regard for the private political preferences of its individual employees, executives and directors.
4. The Company and/or certain of its employees may belong to trade associations and similar organizations (e.g., the National Association of Real Estate Investment Trusts, The Real Estate Roundtable, the National Association of Industrial and Office Properties, etc.) that are engaged in or that the Company anticipates may engage in lobbying or political spending. Any amounts spent by such trade associations or similar groups on lobbying or political spending shall not be attributed to the Company, provided that such activities are not controlled by the Company and are generally undertaken for the benefit of the industry or members of the organization as a whole.
5. The full Board of Directors or the Nominating and Corporate Governance Committee of the Board (which is comprised exclusively of independent directors) shall monitor Company Political Spending, receive annual reports from the Chief Legal Officer, and review this Policy and the purpose and benefits of the expenditures.
6. The Chief Legal Officer shall post a report on the Company’s website in the first quarter of every calendar year which provides (i) the total amount of Company Political Spending approved pursuant to this Policy for the prior calendar year and (ii) the name of and the amount paid to each recipient of Company Political Spending approved pursuant



to this Policy in excess of \$25,000 during such calendar year. Beginning with calendar year 2025 the Chief Legal Officer shall post such reports semi-annually and without regard to any minimum amount.

7. No contribution or expenditure will be given or made in anticipation of, in recognition of, or in return for an official act.
8. Personal, non-corporate contributions and expenses are not affected by this Policy. Under no circumstances shall an employee be reimbursed, directly or indirectly through compensation increases, for personal political contributions or expenses.
9. The Company will not pressure or coerce employees to make personal political expenditures or take any retaliatory action against employees who do not.
10. The Chief Legal Officer shall be responsible for taking appropriate measures to assure compliance with this Policy.

Effective: February 15, 2012

Amended: October 15, 2015

Amended: October 20, 2016

Amended: October 24, 2019

Amended: December 20, 2021

Amended: January 23, 2025



Report on BXP's 2025 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2025: \$200,000

Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2025 and the amount paid to such recipients:

<u>Recipient</u>	<u>Amount</u>
Neighbors for a Better San Francisco	\$100,000
The New California Coalition	\$50,000
Connect Bay Area Transit	\$50,000



Report on BXP's 2024 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2024: \$350,000

Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2024 and the amount paid to such recipients:

<u>Recipient</u>	<u>Amount</u>
Neighbors for a Better San Francisco	\$300,000
Healthy, Vibrant San Francisco	\$20,000
BOMA-SF-PAC	\$10,000
Jean Roland for Superior Court Judge	\$10,000
Jane Kim for San Francisco Democratic County Central Committee	\$5,000
Coalition for More Housing & Revitalized Downtown	\$5,000



Report on BXP's 2023 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2023: \$164,000

Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in excess of \$25,000 in 2023 and the amount paid to such recipients:

<u>Recipient</u>	<u>Amount</u>
Neighbors for a Better San Francisco	\$150,000

Report on BXP's 2022 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2022: \$339,740

Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in excess of \$25,000 in 2022 and the amount paid to such recipients:

<u>Recipient</u>	<u>Amount</u>
The New California Coalition	\$125,000
Neighbors for a Better San Francisco	\$100,000
Committee to Support the Recall of District Attorney George Gascon	\$75,000



Report on BXP's 2021 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2021: \$16,600

Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in excess of \$25,000 in 2021 and the amount paid to such recipients: None

Report on BXP's 2020 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2020: \$1,841,865.13

Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in excess of \$25,000 in 2020 and the amount paid to such recipients:

<u>Recipient</u>	<u>Amount</u>
No on 15 – Californians to Stop Higher Property Taxes and Save Prop 13	\$1,500,000
The Committee for San Francisco Economic Recovery, No on 1	\$250,000



Report on BXP's 2019 Company Political Spending

Total amount of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in 2019:	\$25,665.00
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Recipients of Company Political Spending approved pursuant to BXP's Policy on Company Political Spending in excess of \$25,000 in 2019:	None
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