lobbying and trade associations
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Lobbying and trade associations
message from albert williams
vice president of corporate affairs

“we advocate on behalf of our employees and stockholders to support our ambition to deliver affordable, reliable and ever-cleaner energy. we believe that energy policy is a critical public policy issue and are committed to engaging in the public policy process. we adhere to ethical standards when engaging in lobbying and comply with all laws governing lobbying activities and disclosure.”

– albert (al) williams

Powering human progress takes energy
At Chevron, we believe that energy policy is a critical public policy issue and are committed to engaging in the public policy process. This includes protecting and promoting the interests of our shareholders and carefully considering the needs and concerns of our stakeholders. Chevron also believes that transparency and accountability are important aspects of corporate political activity. That is why Chevron provides extensive disclosure of these activities.

We are guided by The Chevron Way. The Chevron Way has stood the test of time. It’s an integral part of our past and present. And it shows us the way to future success as we continue to develop the energy that improves lives and powers the world forward. It describes Chevron’s vision to be the global energy company most admired for its people, partnership and performance. The Chevron Way guides our engagement with policymakers and stakeholders. Sharing our views, and understanding those of others, is fundamental to our success. Chevron adheres to rigorous ethical standards when engaging in lobbying, ensures that such activities align with corporate goals, and complies with laws governing lobbying activities and disclosure. We lobby ethically, constructively and in a nonpartisan manner.

The Chevron website communicates our focus on transparency and desire to be responsive to stakeholders’ increasing interest in how we engage with policymakers. The website outlines (1) our political engagement strategies; (2) our political engagement oversight, policies, processes and training; and (3) disclosure details, which include our lobbying activities and links to all Chevron external reports representing the jurisdictions where we lobby, comprehensive trade association membership lists, including a 2021 list that identifies U.S.-based organizations that reported a percentage of the 2021 funding they received from Chevron as a lobbying expense. This list also includes a range of lobbying expenditures for each organization.
Chevron's political activities are designed to support our ambition to deliver affordable, reliable and ever-cleaner energy. Our engagements aim to deliver insight and recommendations on policy matters important to Chevron.

**three takeaways from this report**

- **political engagement strategies**
  - Chevron’s political engagement strategies are aligned with corporate goals

- **governance**
  - We have robust governance over political engagements

- **transparency and disclosure**
  - We promote transparency and disclosure of our lobbying, trade association memberships and political contributions
strategy

energy policy is a critical public policy issue

Public policy decisions can have significant implications for Chevron’s current operations and our future. Accordingly, Chevron exercises its right and responsibility to participate in the political process through lobbying and political contributions. Our political activities meet ethical standards, adhere to all applicable policies, procedures and laws, and align with company interests.

Chevron’s 140+ year history brings expertise on many issues and important policy matters. Our goals are to help shape effective, responsible and nonpartisan U.S. energy policy.
Lobbying is an important way for Chevron to participate in the political process. Chevron engages in direct and indirect lobbying. Direct lobbying is conducted by our employees and contract lobbyists. Related activities that support our employees and contractors are referred to as indirect lobbying activities and include research and analysis related to issues and perhaps pending legislation. Indirect activities are performed by both our employees and trade associations of which we are a member.

Chevron works with policymakers to support well-designed policies. In the U.S., Chevron engages with executive and legislative branches of federal, state and local governments to provide perspective on energy issues affecting the United States and the world. Chevron strives to maintain positive, constructive relationships with policymakers and their staffs. Our engagements share views on issues regarding the economy, regulations, energy security, foreign policy, research and energy development. Chevron often responds to requests for public comments on proposed regulations from U.S. agencies, including the Environmental Protection Agency and the Department of the Interior.

My team and I are Chevron's advocates, telling the company's story to a very important audience: policymakers at the U.S. federal and state level, as well as talking to international governments in Washington, D.C. We want to share our expertise with policymakers while maintaining a deep awareness of the opportunities and impacts of legislation and regulation and a focus on supporting affordable, reliable and ever-cleaner energy.

I appreciate the desire of policymakers to engage industry to further our shared goals around energy security and energy transition. My team works in close concert with our Corporate Affairs teams around the world every day.

At the heart of what we do, our reputation and trustworthiness as a company are the most important elements of our advocacy work.
trade association memberships
why we are members

Stakeholder Engagement and Issues Management (SEIM) is part of Chevron’s Operational Excellence Management System (OEMS). In support of SEIM, Chevron holds memberships in industry and other associations that provide expert perspectives on safety, business, technical and industry best practices and a broad range of issues facing policymakers and society.

Trade association memberships allow Chevron to identify emerging issues, test thinking and share perspectives on positions, work constructively with other companies, and participate in setting generally accepted industry practices and standards. We engage with trade associations to participate in the conversation on a broad range of issues relevant to the company’s business, such as a reasonable regulatory environment and well-designed energy and climate policies.

Chevron works with trade associations to advocate for effective, responsible and nonpartisan standards, regulations and energy policies. Working with industry trade associations across a spectrum of policy and nonpolicy issues provides our company access to a range of perspectives.

While Chevron does not control, and may not always agree with, positions taken by trade associations of which it is a member, trade associations provide a unique venue for Chevron to engage other companies and industry experts. We rarely agree 100% with any trade association, but we believe our participation is important to the informed exchange of views on the issues.

We also think that the existence of differences on some issues does not necessarily eliminate the overall value of trade association membership. Chevron acknowledges that these differences can be challenging, so we endeavor to always be open in our engagements with shareholders and stakeholders about any such differences.

For example, in response to stockholder interest and at the Board’s direction, we published the Climate Lobbying Report.

case study: working with API to elevate climate policy

Chevron supported the creation of a new Climate Committee at API and the development of API policy positions that support market-based approaches, innovation and support for the goals of the Paris Agreement.

Consistent with these policy positions, API is now supporting innovation-focused legislation, Advanced Research Projects Agency–Energy (ARPA-E) reauthorization and the expansion of the Regional Greenhouse Gas Initiative (RGGI) in the absence of national, economywide, market-based solutions.

organizations that write model legislation

Chevron holds memberships in organizations made up of state legislators and stakeholders advancing model policies and legislation. Over the last decade, Chevron has contributed to the American Legislative Exchange Council and the National Conference of State Legislatures. Both organizations conduct policy research and hold information-sharing forums among stakeholders. Membership in these organizations provides Chevron with the opportunity to share our perspectives with members and obtain valuable information on issues that are important to Chevron with a variety of stakeholders.
Chevron works with U.S. trade associations on a broad range of energy issues. See value drivers for key industry trade associations.

### Example of Some of Our Key Industry Trade Associations

#### American Petroleum Institute (API)
API represents all segments of the oil and gas industry.

**Our value drivers are:**
- API is a world-class, standard-setting organization that has developed more than 700 standards to enhance operational and environmental safety, efficiency and sustainability
- They advocate to the public, Congress, the executive branch, state governments and the media
- They foster partnerships to advance public policy

#### National Association of Manufacturers (NAM)
NAM is a powerful voice of the manufacturing community and a leading advocate for a policy agenda that helps manufacturers compete in the global economy and create jobs across the U.S.

**Our value drivers are:**
- NAM is the largest manufacturing association in the U.S., representing manufacturers in all 50 states
- They are a respected partner in achieving the expansion of manufacturing in the U.S.
- They are a leader in innovation

#### Western States Petroleum Association (WSPA)
WSPA represents companies in petroleum exploration, production, refining, transportation and marketing in Arizona, California, Nevada, Oregon and Washington.

**Our value drivers are:**
- WSPA is dedicated to ensuring that Americans have reliable access to petroleum and petroleum products through policies that are socially, economically and environmentally responsible
- They work to disseminate accurate information on industry issues while providing a forum for the exchange of ideas

#### American Fuel & Petrochemical Manufacturers (AFPM)
AFPM represents high-tech American manufacturers and midstream companies that enable the production and delivery of nearly all U.S. gasoline, diesel, jet fuel, home heating oil, critical petrochemicals and other refined products.

**Our value drivers are:**
- AFPM advocates for policies that enable an affordable and reliable supply of fuels to meet global demand
- They lead policy efforts to support and expand the adoption of and provide forums for industrywide sharing on sustainability initiatives
- They are a voice for industry safety programs and facilitate industrywide collaboration to advance safety and efficiency at manufacturing facilities
political contributions
why we give

Chevron makes corporate political contributions in the U.S. and Australia when permitted by law. Our objective is to support state and local candidates, political parties, political committees and measures that are aligned with Chevron’s business interests. This includes candidates and organizations that support:

- responsible development of oil and natural gas resources
- reasonable regulatory regimes
- economic development
- free enterprise
- market-based solutions
- good governance

The Chevron Employees Political Action Committee (CEPAC) is also a forum for eligible employees, shareholders and retirees to voluntarily contribute to an employee-governed fund that supports the election of pro-energy candidates to Congress and to candidates in states where corporate contributions are prohibited (e.g., Texas).

The above mentioned factors are also considered before CEPAC makes any political contributions.
Chevron has strict policies to help employees understand requirements for engaging with U.S. political officials. For example, company policies specify that Chevron’s vice president of Corporate Affairs is responsible for providing an effective political engagement program that complies with all laws and regulations and internal policies, including complete and timely lobbying registration and reporting.

Both lobbying and corporate political contributions are highly regulated internally by the Government Affairs team with rigorous oversight by Chevron’s corporate compliance team and audit.

Chevron provides dedicated compliance staff, legal counsel and resources to ensure compliance with all relevant laws, regulations, and company policies related to corporate lobbying activities and political contributions.

In addition, Chevron has a robust risk assessment process to ensure business unit leadership identifies, analyzes and takes steps to mitigate the risks associated with their business unit’s political engagements. The results of these assessments are then reported to Chevron leadership.

Chevron’s Public Policy and Sustainability Committee is chartered to assist the Board of Directors in overseeing – among other things – political activities and providing appropriate attention and effective response to stockholder concerns regarding such activities. The committee annually reviews the policies, procedures and expenditures related to the Corporation’s political contributions and lobbying to assess the value of these activities and ensure alignment with Chevron’s positions and interests. At the time this review is conducted, the committee provides guidance on Chevron’s political activities to the vice president of Corporate Affairs.

<table>
<thead>
<tr>
<th>Policy</th>
<th>Description</th>
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<tbody>
<tr>
<td>Engaging with U.S. public officials</td>
<td>Provides an overview of processes and requirements when engaging U.S. public officials</td>
</tr>
<tr>
<td>Government Affairs oversight</td>
<td>Guides how Chevron engages public officials and provides oversight</td>
</tr>
<tr>
<td>Political contributions</td>
<td>Addresses what are political contributions, when political contributions will be made and the approval process when making contributions</td>
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**Oversight: Direct and Indirect Lobbying**

**Lobbying activities**

Lobbying activities, in the United States and elsewhere, are highly regulated. Each jurisdiction sets forth regulations and establishes the policies and guidelines associated with reporting and disclosure. Chevron has an effective program to comply with all laws and regulations, including complete and timely lobbying registration and reporting. Prior to engaging in lobbying activities, employees must obtain guidance from Chevron’s vice president and general manager of Government Affairs, Chevron’s political law counsel and Chevron’s political compliance team.
lobby activity tracking and reporting process

Certain lobbying activities require periodic reporting. Chevron’s Corporate Affairs centrally manages a process to gather and report lobbying activities which includes: officials contacted, matters lobbied, employee time, expenses, gifts and political contributions depending on the jurisdiction’s requirements.

Key elements of the procedures are:
- Determination of lobbying registration and reporting requirements
- Approvals from legal and Corporate Affairs in advance of registering as a U.S. lobbyist, or hiring a political consultant or lobbyist
- Internal reporting of all U.S. lobbying activities
- Procedures to report lobbying activities to U.S. federal, state and local jurisdictions in a timely manner

All payments made to nonprofit organizations, such as a 501(c)(4) social welfare organization or 501(c)(6) trade association, who may use Chevron funds for lobbying purposes, must be planned and budgeted with management oversight. It is part of our internal policies to centralize these payments for proper reporting and oversight purposes.

trade association approval process

On an annual basis, senior Chevron staff review trade association memberships to consider value to the business. All associations in which a portion of funds are anticipated to be used for lobbying purposes go through a rigorous budgeting process. Where appropriate, senior Chevron staff will sit on trade association boards and advisory committees to directly engage the associations. The Board of Directors Public Policy and Sustainability Committee annually reviews Chevron’s lobbying activities and budget, including trade association memberships, to assess value and alignment with Chevron’s interests.

All payments made to nonprofit organizations, such as a 501(c)(4) social welfare organization or 501(c)(6) trade association, who may use Chevron funds for lobbying purposes, must be planned and budgeted with management oversight. It is part of our internal policies to centralize these payments for proper reporting and oversight purposes.

View a list of 2021 association memberships that identifies U.S.-based organizations that reported a percentage of the 2021 funding they received from Chevron as a lobbying expense. This list also includes a range of lobbying expenditures for each organization.

in 2021, approximately 34% of our payments to U.S.-based trade associations were attributed towards non-deductible federal, state, local and grassroots lobbying as provided to Chevron by the organizations.

* This disclosure goes beyond what is required by the Lobbying Disclosure Act, therefore the amounts reported may exceed other legal disclosures made. A good-faith effort has been made to compile this information.
oversight: political contributions

The two ways Chevron makes political contributions in the U.S. are through corporate contributions and Chevron employees political action committee (CEPAC).

- Chevron contributes to various organizations organized under sections 527, 501(c)4 and 501(c)6 of the U.S. Internal Revenue Code. Chevron has strict policies and internal approval processes to ensure that decision making and reporting on political contributions are centrally controlled and comply with all applicable laws. Under these policies, political contributions (monetary or nonmonetary) are centrally controlled and, regardless of the amount or country of the contribution, are planned, budgeted and endorsed by the executive committee and approve by internal and external legal counsel and Government Affairs.

- Political contributions are proposed and budgeted by company Corporate Affairs representatives who work closely with business unit representatives at all levels of the organization. These proposed contributions are routinely discussed with business unit managers at all levels of the organization to ensure alignment with company interests, adherence to compliance processes and preservation of corporate reputation.

post-budget endorsement: more oversight

After the budget is endorsed by the executive committee, all corporate political contributions require (1) legal approval and (2) vice president and general manager of Government Affairs approval and in some cases (3) the vice president of Corporate Affairs approval.

Global corporate political contributions in 2020 were approximately $16.8 million. These contributions include support to candidates, organizations, political committees, independent expenditure committees and on local and state ballot measures. The majority of these organizations are organized under section 527 of the Internal Revenue Code, and a small portion of political contributions are made to 501(c)(4) and 501(c)(6) organizations. Chevron does not use corporate funds to make independent expenditures in direct support or opposition to a campaign; rather, Chevron contributes to independent expenditure committees providing support or opposition to a campaign.

Should this ever change, Chevron will disclose any direct independent expenditures on the website and as required by campaign finance law.

- The political contributions budget is reported annually to the executive committee. All contributions and all Chevron employees adhere to strict internal review procedures, and no employee is reimbursed for making a political contribution. All corporate political contributions are made independent of executives’ personal political preferences and in alignment with Chevron’s business interests.

- Yearly, the Board of Directors Public Policy and Sustainability Committee annually reviews Chevron’s political contribution activities and budget.

- In an effort to increase transparency, we also have included a 2021 semiannual list of corporate political contributions, many of which are registered section 527 committees.

oversight: chevron employees political action committee (CEPAC)

- CEPAC is a forum for eligible employees, shareholders and stockholder retirees to voluntarily contribute to a fund that supports the election of pro-energy industry candidates to Congress and to candidates in states where corporate contributions are prohibited (e.g., Texas). Decisions about contributions to specific federal and state candidates are made by members of the employee-led CEPAC Board, with input from the company’s federal relations staff in Washington, D.C., and field Corporate Affairs managers. 

CEPAC contributed approximately $1.2 million in 2019–2020 election cycle to support candidates from both parties. By policy, CEPAC does not contribute to presidential candidates or national political parties.

- In addition to the disclosure already provided, we are providing the list of 2021 semiannual CEPAC contributions for the convenience of our readers.

we have disclosed our political contributions yearly for over a decade. you can find the last five years of political contributions, both corporate and CEPAC, linked on our website.
Chevron provides a regularly scheduled training program for employees who might engage in lobbying activities, so employees understand and adhere to applicable U.S. federal, state, and local laws and regulations.

**Formal Online Training**
As part of our oversight, employees receive robust web-based training on political compliance education. This training is mandatory and delivered to in-scope employees. The training tool is translated in several required languages.

**Formal In Person Training on Lobbying and Political Contributions**
- In addition, to online training, internal legal counsel and the political compliance team provides regularly scheduled training to all employees who might engage in lobbying activities, so they understand and adhere to applicable U.S. federal, state, and local laws and regulations;
- In some jurisdictions like California, the state also requires lobbyists take training as part of their registration.

**Governance Summary**
We take a number of steps to promote transparency and accountability for our political involvement:
- We have sound policies and processes
- The executive committee yearly reviews and endorses corporate political contributions and central budget
- The Public Policy and Sustainability Committee of our board receives and reviews the policies, procedures and expenditures for our political contributions and direct and indirect lobbying
- We have a robust training and audit program and conduct regular reviews of our lobbying and related processes to ensure compliance with all applicable laws and Chevron policies
- We report all jurisdictions where we lobby
- We report a five-year history of corporate political and CEPAC contributions on the company’s external websites
- Upon written request by any stockholder, we provide a list of all political contributions
- Contribution and lobbying data are available from a number of public sources
transparency and disclosure

chevron is committed to transparency

trade associations
We list a four-year history of trade association memberships where a portion of dues are attributed towards lobbying, including a 2021 list that represents all trade associations using a portion of the dues towards lobbying. This list also includes a range of lobbying expenditures for each organization.

Chevron trade memberships
- 2021: Chevron Trade Memberships
- 2020: Chevron Trade Memberships
- 2019: Chevron Trade Memberships
- 2018: Chevron Trade Memberships

political contributions
We have disclosed our political contributions yearly for over a decade. You can find the last five years of political contributions, both corporate and CEPAC, linked on our website.

Five-year history of corporate political contributions
- 2017: Chevron Corporate Political Contributions
- 2018: Chevron Corporate Political Contributions
- 2019: Chevron Corporate Political Contributions
- 2020: Chevron Corporate Political Contributions
- 2021: Chevron Corporate Political Contributions
  (January–June 2021)

Five-year history of CEPAC contributions
- 2017-2018: Chevron Employees PAC
- 2019-2020: Chevron Employees PAC
- 2021: Chevron Employees PAC
  (January–June 2021)

2020 CEPAC contributions FEC report filings
Click to view each report
- February monthly report (2020)
- March monthly report (2020)
- April monthly report (2020)
- May monthly report (2020)
- June monthly report (2020)
- July monthly report (2020)
- August monthly report (2020)
- September monthly report (2020)
- October monthly report (2020)
- Pre-general report (2020)
- Post-general report (2020)
- Year-end report (2020)

Historical CEPAC contributions
A link to the Federal Election Commission website, which contains current and previous years’ CEPAC contributions reports. Federal Election Commission (Search: Chevron)

lobbying reporting
For all jurisdictions where we are registered to lobby, we disclose and link to websites where you can find our reports.

- A link to the federal lobbying disclosure website and instructions for accessing Chevron’s current and previous years’ federal quarterly reports. These reports disclose total expenditures related to lobbying and issues lobbied. Federal Lobbying Disclosure Report (Search Registrant Name: Chevron)

- A link to the federal lobbying contributions search website. This site contains the details of Chevron's current and previous years' contributions. Federal Lobbying Contribution Report (Search Organization Name: Chevron)

- A link to the California Secretary of State Lobbying Activity website and instructions for accessing Chevron’s current and previous year’s quarterly lobbying reports. California State Lobbying Report (Search Registrant Name: Chevron)

- Links to other states’ lobbying activity websites and instructions for accessing the Company’s state lobbying reports have been added to the website to provide greater access and transparency into Chevron’s lobbying activities.

Note: Each state has a different definition for lobbying and the type of lobbying activities to be reported. For more information, click on the state or city of interest to understand more about its reporting requirements and to find Chevron’s lobbying report.
state reports

Alabama (Search Principal’s Quarterly Statement of Lobbying Activities, type Chevron as the Principal name, select Search)

Arizona (Search Principal Name: Chevron)

California (Search Organization Name: Chevron)

Florida (Select View: By Principal: Click the letter “C” and scroll down)

Idaho (Search By Employer Name: Chevron)

Louisiana (Search Company’s Name: Chevron)

Mississippi (Client Name: Chevron)

New Mexico (Search: Chevron)

Oregon (Search Business Name: Chevron)

Texas (Search by Client Name, then Entity Name: Chevron)

Utah (Search Text: Chevron)

Washington (Employer: Chevron)