

EMC CORPORATION

Political Contributions Policy

I. Introduction

EMC Corporation (“EMC”) is committed to responsible participation in the political process in compliance with applicable Federal, state and local laws and reporting requirements. Political activity is conducted in a legal and ethical manner, consistent with good corporate governance practices.

Federal law and certain state laws prohibit a corporation from making contributions to Federal and certain state political campaigns. This includes monetary contributions as well as “in-kind” contributions, such as the use of corporate facilities.

A corporation may, however, establish and administer a political action committee to make political contributions. Where allowed, a corporation may also make state and local political contributions in certain states, as well as contributions to certain other political organizations.

II. Oversight Process

A. EMC Political Action Committee. EMC has established the EMC Political Action Committee (the “EMC PAC”), a nonpartisan committee registered with the Federal Election Commission. EMC PAC funds consist of voluntary, pooled employee contributions.

The EMC PAC shall be administered by the EMC PAC Board of Directors, which shall consist of no fewer than three directors, one of whom shall be the Corporation’s Chief Compliance Officer.

The EMC PAC has Articles of Organization and By-laws which govern the administration of the EMC PAC, including the powers and authority of its Board of Directors and officers as well as the criteria for disbursement of funds contributed.

Any contribution made by the EMC PAC shall be reviewed and approved by the EMC PAC Board. Any contribution made by the EMC PAC shall be reported to and publicly available from the Federal Election Commission.

- B. Corporate Political Contributions. From time to time, EMC may make permitted corporate political contributions as set forth above. Any such contribution shall be reviewed and approved by EMC's Office of Corporate Government Affairs and the Chief Compliance Officer.
- C. Board Oversight. EMC's Office of Corporate Government Affairs and the EMC PAC Board shall report at least annually regarding political contributions to the Corporate Governance and Nominating Committee of the Board of Directors of EMC Corporation. The Corporate Governance and Nominating Committee will periodically review and assess the appropriateness of the policies and procedures set forth herein.

III. Policy

All employees of EMC must comply with the following requirements:

- Only eligible employees may make contributions to the EMC PAC. For additional information about making a contribution, please contact the Executive Vice President, General Counsel and Chief Compliance Officer (General_Counsel@emc.com).
- You may also make political contributions as an individual. These are personal and may not be made as a representative of EMC.

- Any proposed political contribution by EMC, whether monetary or “in kind,” must be submitted to the Chief Compliance Officer for pre-approval in accordance with this policy. This includes a contribution for the benefit of any political candidate, campaign, party or committee (e.g., a PAC or ballot measure committee), or any “527 organization.” As used in this policy, a 527 organization is a tax-exempt entity organized under Section 527 of the Internal Revenue Code to raise money for political activities including voter mobilization efforts and issue advocacy, but not to support or oppose specific candidates.
- You may not use or threaten force or reprisal against any employee for contributing to, supporting, or opposing any political group or candidate.

If you have any questions relating to this policy or to a specific political contribution, you may contact the Executive Vice President, General Counsel and Chief Compliance Officer (General_Counsel@emc.com).

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