



The ADT Corporation U.S. Political Activity Statement

The ADT Corporation believes it has a responsibility to engage on policy issues that affect our employees, communities and business. To maintain and develop its leadership role both in business and as a corporate citizen, ADT seeks to engage government officials and processes throughout the United States. Related to this effort, ADT may make political contributions directly or through its political action committee. All political contributions made by ADT are in compliance with campaign finance reporting and public disclosure obligations required by federal, state and local laws.

All political contributions are made without regard for the private political preferences of company officers, executives or employees. Political contributions are not given to an official in exchange for an official act or to advance particular business projects. Criteria for evaluating political contribution recommendations include:

- Positions on issues of importance to ADT
- Commitment to improving the overall business climate
- Committee membership
- Leadership position
- Employee / facility presence in state / district

Political Action Committee

The company's federal political action committee, ADT PAC, is funded by voluntary contributions from eligible employees and may support candidates and committees at the federal, state and local level. Employee contributions to the ADT PAC are voluntary and without coercion.

Corporate Political Contributions

ADT may elect to use corporate resources to make direct contributions to political committees, candidates and political parties where permitted by law. Corporate political contributions are limited to no more than \$25,000 for governors and attorneys general and no more than \$5,000 for other candidates annually, without approval from the Nominating and Governance Committee of the Board of directors of ADT. Total corporate political contributions are limited to \$250,000 or less per annum without Nominating and Governance Committee approval.

Trade Associations

ADT belongs to a number of business and trade associations, as they provide a useful forum for sharing ideas and information regarding general business and industry matters.

Independent Expenditures

ADT does not fund independent expenditures at the federal, state or local level. Independent expenditures are defined under federal law as expenditures for a communication in support of or in opposition to a political candidate without their coordination.

Approval and Oversight

ADT has compliance procedures for the proper oversight of political contributions. The company adheres to its Code of Conduct, which requires employees to deal honestly with government. Additional internal compliance policies require advance business and legal approval of all political contributions. The company's Chief Legal Officer and the Head of Government and Regulatory Affairs have final authority and must approve all political contributions. A report of all political contributions is presented to the Nominating and Governance Committee at least annually. The Nominating and Governance Committee, comprised entirely of outside directors, oversees this process and periodically reviews this political activity statement.