

Political Activity Disclosure Policy, 12.17.12

TIAA-CREF Political Activity Disclosure Policy

We manage our assets in a responsible manner in order to ensure our participants' financial well-being. As an insurance company, we are regulated by numerous federal agencies and subject to regulatory authority in all 50 states, Puerto Rico and the U.S. Virgin Islands. Our mission driven, non-profit heritage puts us in a unique position relative to others in our industry. To fulfill our obligations to our participants, we must be fully engaged in policy issues that affect our industry, our company and our clients. Such issues include, for example, retirement security, financial services and insurance industry issues. As such, TIAA-CREF engages in lobbying activity on the federal level and in several states. In addition, TIAA-CREF maintains a federal political action committee ("PAC").

Engagement on Public Policy

TIAA-CREF believes that as a responsible corporate citizen, it is important to participate in the political process and actively engage in policy debates. As a leader in its industry and an acknowledged expert on retirement and financial services issues, TIAA-CREF often is consulted on policy deliberations at the federal level and in the states. We take part in those policy deliberations that affect our industry, our company or our clients. Our public policy positions are developed as part of a process that provides for cross-functional analysis. They are vetted formally among our senior leaders before any actions are taken.

TIAA-CREF files state and federal campaign finance and lobbying disclosure reports in accordance with applicable requirements. Copies of federal reports are available here: www.ethics.gov. State campaign finance and lobbying disclosure reports are available on the websites of each state's ethics disclosure agency or the Secretary of State's office.

Political Participation

Federal law and the laws of many U.S. states generally prohibit the use of corporate resources to directly support the election campaigns of candidates for public office. Corporations are permitted to engage in independent expenditures, which fund electioneering communications supporting or opposing candidates, as long as this activity is not coordinated with any candidate's campaign. TIAA-CREF has not used corporate funds in this manner.

Eligible TIAA-CREF employees may make voluntary contributions to the TIAA-CREF Political Action Committee (PAC), a non-partisan fund used to support federal candidates and political committees. Decisions regarding PAC contributions are made by the TIAA-CREF PAC Steering Committee, which is comprised of TIAA-CREF leaders who are members of the PAC. The PAC's activities are regularly reported and regulated by the Federal Election Commission.

Our Governance Process

The company is committed to full compliance with all applicable laws and regulations in connection with any political or advocacy activities. Management provides regular reporting to the appropriate committees of the TIAA Board of Trustees (“Board”) regarding the political activities of the company. These committees, as appropriate, review these reports periodically to ensure that they are conducted for the benefit of our company and/or clients, including the risks and benefits of such activity.

Compliance Programs

TIAA-CREF employees are permitted to participate in the political process in legal and ethical ways. Given the breadth of the company’s state and local business, and because we are highly regulated, TIAA and its employees also are subject to the myriad federal, state and local rules designed, among other things, to prevent conflicts of interest in government procurement. In addition to imposing requirements on the company, these rules also restrict the extent to which employees may be personally engaged in the political process. TIAA has implemented policies and procedures in order to monitor and record-keep the political activity of its employees as well as that of the company.

As well as restricting political participation by the company and its employees, state and local rules also may impose restrictions and/or reporting requirements on gifts and entertainment provided to government officials. The company has implemented a reporting program designed to ensure that these activities are compliant with applicable laws and regulations.

Political and advocacy activities are conducted by TIAA-CREF’s government relations department, which reports its activities to the Board of Trustees. Political and advocacy activities are consistent with internal TIAA-CREF corporate policies. Government relations employees are trained on applicable federal and state legal requirements on a regular basis. Our government relations employees adhere to the applicable standards for ethics and integrity and our advocacy activities are disclosed in accordance with all applicable laws.