

The Kroger Co. Political Contribution Policy—Updated March 2010

Public policies set at federal, state, and local levels may impact our company, customers and associates. The Kroger Co. is actively engaged in the political process in many ways. Financial contributions to office holders, issues, and candidates are one small way our company is involved. This document outlines our commitment to the highest level of compliance, transparency and integrity in our political contributions.

KroPAC

KroPAC is The Kroger Co.'s Federal Political Action Committee. KroPAC is funded by voluntary and modest contributions from our managers and executives. KroPAC makes contributions, where allowed, to federal, state, and local candidates, initiatives, and organizations.

State PACs

The Company no longer solicits for division-level PACs. State PACs are currently closed and are spending down the remaining balances.

KroPAC Membership and Solicitation

No executive or manager at The Kroger Co. may coerce another associate into making a political contribution to KroPAC. PAC solicitations are conducted in compliance with all FEC regulations governing solicitations and our policy is to only solicit management associates.

Managers and executives who contribute to KroPAC receive regular communication about the use of KroPAC funds and company political involvement. Input from our associates, managers, and executives help the company determine which issues, candidates, and organizations KroPAC will support.

Corporate Contributions

Occasionally and where permitted by law, The Kroger Co. may make modest political contributions directly to state or local candidates using corporate funds. Such contributions may be made to state and local candidates, initiatives, and organizations, only in states where such contributions are permitted. However, despite the recent ruling by the Supreme Court, The Kroger Co. does not permit spending corporate funds to air advertisements or finance specific activities in favor or opposition to a particular candidate.

In-Kind and Other Contributions

The Kroger Co. generally does not make in-kind gifts to elected officials or candidates. In the very rare circumstances such contributions are made, relevant laws and regulations are followed.

Contributions to Candidates, Issues, and Organizations

All corporate and KroPAC political contributions are reviewed and approved by the Corporate Affairs Department at The Kroger Co. Approval is contingent on some or all of these factors:

- The number of stores, facilities, or associates within a candidate's or organization's district or state;
- The candidate's or organization's potential to impact various issues that may be of concern to the company, our industry, associates or customers;
- The impact of an issue campaign on the company or on the community where Kroger operates.

Reporting

The Kroger Co. complies with all laws governing political contributions and all required reports. Annually, the Company publishes a political giving report. This report notes all of the Company's political giving, including corporate and PAC spending. In addition, the report details Kroger's memberships in federal trade associations. This is a voluntary report that the Company publishes to aid in transparency.