

## Political Contribution Policy

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Public policies set at federal, state and local levels may affect our associates, customers, communities and company. The Kroger Co. is actively engaged in the political process in many ways, including making modest financial contributions to office holders, issues and candidates. This document outlines our commitment to manage political contributions with integrity and transparency, and in a manner that complies with relevant federal, state and local laws.

### KroPAC

KroPAC is the company's federal Political Action Committee (PAC). KroPAC is funded by voluntary contributions from Kroger leaders and salaried management associates. KroPAC makes contributions, where allowed, to federal, state and local candidates, initiatives and organizations.

### KroPAC Membership & Solicitation

KroPAC solicitations are conducted in compliance with relevant Federal Election Commission (FEC) regulations, and we limit solicitation to salaried management associates only. No Kroger executive or manager may coerce another associate into making a political contribution to KroPAC. Members receive regular communication about the use of KroPAC funds and the company's political involvement. Members' input helps the company determine which issues, candidates and organizations KroPAC will support.

### Corporate Political Contributions

Occasionally and where permitted by law, the company may make political contributions directly to state or local candidates using corporate funds. Such contributions may be made to state and local candidates, initiatives and organizations in states where such contributions are permitted. Despite the 2010 Supreme Court ruling in *Citizens United vs. FEC*, we do not direct corporate funds to political advertisements or to specific activities in favor of or in opposition to a particular candidate.

### In-Kind & Other Contributions

Kroger generally does not make in-kind gifts to elected officials or candidates. In the rare event of an in-kind contribution, we follow all relevant laws and regulations.

### Contributions to Candidates, Issues & Organizations

All corporate and KroPAC contributions are reviewed and approved by a centralized Corporate Affairs team, which reports regularly to the Public Responsibilities Committee of the Board of Directors.

Approval of contributions is contingent on some or all of these factors:

- The number of associates, stores or facilities within a candidate's or organization's district or state;
- The potential for a candidate or organization to affect various issues that may be of concern to associates, customers, the company or our industry; or

- The potential impact of an issue or topic on the company or the communities in which we operate.

## Reporting

The company complies with all laws governing political contributions and reporting, including publishing a Political Contributions Report. This report outlines the company's political giving, including corporate and KroPAC funds.

This annual report also provides specific details on national trade associations in which Kroger is a member. In addition to disclosing where we pay trade association membership dues, we also make a reasonable effort to obtain information about what portion of those dues were used for lobbying or political expenditures from associations where our dues exceed \$25,000 or more. This is also disclosed in our [Political Contributions Report](#).