



POLICIES ON CORPORATE CIVIC ENGAGEMENT

Kellogg is committed to maintaining appropriate transparency in our political giving practices. We have a long-standing policy on corporate political activities, set forth below and in our [Global Code of Ethics](#). Kellogg has adequate controls in place to direct, monitor and disclose its political activities in compliance with applicable laws. Our Head of U.S. Government Relations, in collaboration with the SVP, Global Corporate Affairs, manages involvement in the political process, with the General Counsel, Board of Directors and independent experts providing oversight.

Corporate Political Contributions

Where permitted by law, Kellogg may contribute to candidates, political parties, political committees and ballot initiatives. Use of company funds for political contributions requires prior approval by the Head of U.S. Government Relations and the General Counsel. While permitted by law, Kellogg has chosen not to make independent expenditures or contribute to independent expenditure committees or to other organizations (e.g., 501(c)(4) and 527 organizations) for the purpose of making independent expenditures.

The Board of Directors' Social Responsibility and Public Policy Committee is composed entirely of outside directors, and reviews and has oversight responsibility for public policy and government relations efforts and political expenditure practices. The committee reviews the company's political contributions policy and political expenditures made with corporate funds.

Political contributions reflect the interests of Kellogg Company and not those of its officers, executives, or directors. We post details of corporate political contributions semi-annually on Kellogg's website.

Trade Associations

Kellogg is a member of, or otherwise contributes to, several trade and industry associations engaging in lobbying and political activities. These associations report to Kellogg the portion of our dues and other payments used for lobbying and political expenditures. Kellogg includes this amount in our quarterly lobbying disclosure reports. We disclose semi-annually a list of groups to which our dues/payments exceed \$50,000, as well as the specific amounts attributed to nondeductible lobbying activities.

Kellogg Company Better Government Committee (KCBGC)

Established in 1976, the Kellogg Company Better Government Committee Political Action Committee (KCBGC PAC) is funded by personal, voluntary contributions from eligible employees and Board members. An executive Steering Committee governs all PAC activities. KCBGC PAC supports candidates seeking elected office at the federal, state and local level who support issues important to Kellogg's business.

The Federal Election Commission (FEC) regulates all PAC activity. The FEC requires that we report receipts over \$200 and all campaign contributions. We file monthly reports, publicly available on the [FEC website](#).

Employee Political Activities

Kellogg employees have the right to provide personal financial support to political committees of their choosing (such as candidates, political parties, and other interest groups) and to interact with lawmakers on their own time and in their personal capacity. However, our policies prohibit employees from engaging in personal political activities during working hours and using company resources for personal political activity. Kellogg does not reimburse employees for personal political contributions or other expenses.