

Political Contributions Policy

Kellogg is committed to maintaining appropriate transparency in our political giving practices. We have a long-standing policy on corporate political activities which is set forth below and in our [Global Code of Ethics](#). Kellogg has adequate controls in place to direct, monitor, and disclose its corporate political activities in compliance with applicable laws. Kellogg's involvement in the political process is managed by the Vice President of Global Government Relations, with the General Counsel, the Company's Board of Directors and independent experts providing oversight.

Corporate Political Contributions

Where permitted by law, Kellogg may make contributions 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 make contributions to independent expenditure committees or to other organizations (e.g., 501(c)(4) and 527 organizations) for the purpose of making independent expenditures.

The Social Responsibility and Public Policy Committee of the Company's Board of Directors is currently 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 policy on political expenditures, the Company's payments to trade associations, and political expenditures made with corporate funds.

Political contributions reflect the interests of Kellogg Company and not those of its officers, executives, or directors. Details of political contributions will be posted on Kellogg's website on a semi-annual basis.

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. The KCBGC PAC is a nonpartisan entity. KCBGC PAC supports candidates seeking elected office at the federal, state and local level who support issues important to Kellogg's business. All KCBGC contributions and activities are governed by a Steering Committee consisting of senior executives, who are PAC members.

The KCBGC PAC is strictly regulated by the Federal Election Commission (FEC). Contributions to the KCBGC PAC over \$200 and all contributions by the KCBGC PAC are required to be reported to the FEC and are publicly available on the [FEC's website](#).

Trade Associations

Kellogg is a member of, or otherwise contributes to, several trade and industry associations which engage in lobbying and political activities. The portion of our dues and other payments used for lobbying and political expenditures is reported by the trade association to Kellogg. Kellogg includes this amount in our quarterly lobbying disclosure reports filed with Congress. We will disclose annually a list of groups to which the portion of our payments for the previous calendar year allocated for nondeductible lobbying expenses was at least \$20,000.

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.