

# **BROWN-FORMAN CORPORATION**

## **Political Engagement and Contributions Policy**

### **POLICY PURPOSE**

Brown-Forman Corporation (“Brown-Forman” or the “Company”) understands that the decisions made by policymakers have a significant impact on our business, stockholders, communities, customers, suppliers, and industry. As a result, we seek to engage with and educate elected and appointed officials regarding our business, operations, industry, company, products, and the communities we serve.

Brown-Forman believes that transparency and accountability with respect to political expenditures are important to our stockholders and critical to our compliance with laws, regulations, public disclosure and reporting obligations, and company policies concerning this area.

### **POLICY STATEMENT**

Consistent with federal law, Brown-Forman does not make contributions, including in-kind contributions, to candidates for federal office or national party committees. However, where permitted by U.S. law, we contribute corporate funds to state and local candidates, parties, committees, ballot measures, and political organizations. All of our political activities are focused on promoting the best interests of the Company, without regard to the personal political preferences or affiliations of any of our employees, officers, directors, or significant stockholders.

Brown-Forman’s corporate political contributions are subject to internal procedures designed to align these efforts with our public policy priorities and applicable law. Brown-Forman makes political contributions to candidates from both parties using objective criteria that promote the best interests of the Company. All political contributions using corporate funds must be approved by the Senior Vice President, Director of Global Public Affairs. Brown-Forman makes corporate political contributions through the Jack Daniel’s PAC. Contributions through the Jack Daniel’s PAC and all other corporate political contributions to state and local candidates, parties, committees, ballot measures, and political organizations, including so-called 527 organizations, are listed on Appendix A. This list will be updated annually.

The Company does not make “independent expenditures,” that is, we do not buy ads directly supporting or opposing any candidate for office or ballot measures. The Company also does not generally make contributions to 501(c)(4) organizations for the purpose of making independent expenditures and if the Company does make contributions to 501(c)(4) organizations in the future, we will list such contributions on Appendix A and update such list on annual basis. The Company does not make any political contributions outside of the United

States without the prior approval of the Senior Vice President, Director of Global Public Affairs and if the Company makes political contributions outside of the United States in the future, such contributions will be listed on [Appendix A](#) and updated annually.

## **BOARD OVERSIGHT OF POLITICAL ACTIVITIES**

The Corporate Governance and Nominating Committee of Brown-Forman's Board of Directors will exercise oversight with respect to the Company's political activities. The Senior Vice President, Director of Global Public Affairs will provide annual updates to the Corporate Governance and Nominating Committee on such matters consisting of reports on public policy issues, political engagements, and corporate political contributions. The Corporate Governance and Nominating Committee will annually review such activities and related policies.

## **POLITICAL ACTION COMMITTEE**

Brown-Forman offers its employees an opportunity to participate in the political process by contributing to an employee-funded PAC. The PAC makes political contributions to federal candidates, campaigns, and political parties, as well as to state and local candidates, campaigns, and political parties. However, the PAC does not make contributions to other political action committees. Contributions made by the PAC are funded entirely by eligible Brown-Forman employees on a voluntary basis, and not with corporate assets. The PAC allows employees to pool their financial resources to support federal, state and local candidates, political parties, and campaigns. Eligible employees who do not choose to participate do so without fear of any adverse action.

## **PAC OVERSIGHT**

The PAC makes contributions in accordance with objective and consistent evaluative criteria. The activities of the PAC, which is governed by its own Board of Directors, are subject to comprehensive regulation by federal and state governments, including detailed disclosure requirements. The PAC files monthly reports of receipts and disbursements with the Federal Election Commission ("FEC"), as well as pre-election and post-election FEC reports. [Click here for the FEC database of PAC contributions](#) and enter "Brown-Forman Corporation Non-Partisan Committee for Responsible Government" or "Committee ID: C00059733" with respect to the PAC.

## **TRADE ASSOCIATIONS**

As part of our engagement in the public policy process, Brown-Forman maintains memberships in certain industry trade organizations representing the interests of the beverage alcohol companies and the broader business community with purposes that include, but are not limited to, education about the industry, issues affecting the industry, and industry best practices and standards. We may not always support every position taken by our trade associations or the other members, but we believe our participation in these organizations makes us more effective

and broadens our perspective on policy issues critical to our industry, our company, our customers, and our communities. As a general matter, the trade associations of which Brown-Forman is a member, like other membership-directed organizations, are driven by consensus. Typically, no one member dictates priorities over the concerns/objections of other members.

Our trade associations endorse those substantive positions where consensus has been reached; we may therefore recuse ourselves from an activity or initiative when appropriate or when we have a divergent point of view. The list of U.S. industry and/or trade organizations to which we belonged in fiscal 2020, and to which our annual payments exceeded \$50,000, are disclosed in Appendix A, along with the amount used by such industry and/or trade organizations for non-deductible expenses. The Company maintains memberships in trade associations outside of the U.S. in accordance with the laws of each applicable jurisdiction.

## **EMPLOYEE POLITICAL ENGAGEMENT**

The Company encourages its employees to participate in political activities in their personal capacity, including by making contributions to candidates, parties, committees, ballot measures, and political organizations, irrespective of whether such people or organizations hold views that are consistent with the interests of the Company. Employees may not, however, use any Company assets in connection with such activities, including their Company email account, Company stationery, or Company logo, nor may they in any way imply that their personal political engagement reflects in any way the views of the Company, irrespective of whether the Company has made contributions to the same person or organization. An employee may use Company facilities to host a personal political event if the Company makes such facility available to the general public for similar events for a fee, and if he or she pays such fee.

Appendix A

Fiscal Year 2020

**Jack Daniel's PAC Contributions**

<b>Campaign Name</b>	<b>Amount</b>
<b>Raumesh Akbari for State Senate</b>	<b>\$1000</b>
<b>Janice Bowling for State Senate</b>	<b>\$1000</b>
<b>Briggs PAC</b>	<b>\$2000</b>
<b>Todd Gardenhire for State Senate</b>	<b>\$2000</b>
<b>Ferrell Haile for State Senate</b>	<b>\$1000</b>
<b>Ed Jackson for State Senate</b>	<b>\$2000</b>
<b>VoteKelsey.com</b>	<b>\$2000</b>
<b>McPAC</b>	<b>\$10,000</b>
<b>Shane Reeves for State Senate</b>	<b>\$2000</b>
<b>BoWPAC</b>	<b>\$2000</b>
<b>Dawn White for State Senate</b>	<b>\$2000</b>
<b>KEY PAC</b>	<b>\$7500</b>
<b>Jeff Yarbrow for State Senate</b>	<b>\$2000</b>
<b>Tennessee Senate Republican Caucus</b>	<b>\$5000</b>
<b>Tennessee Senate Democratic Caucus</b>	<b>\$2000</b>
<b>CAMPAC</b>	<b>\$10,000</b>
<b>Kelly Keisling for State Representative</b>	<b>\$3000</b>
<b>Bob Ramsey for State Representative</b>	<b>\$3000</b>

<b>Rick Eldridge for State Representative</b>	<b>\$1000</b>
<b>Bill Beck for State Representative</b>	<b>\$2000</b>
<b>Rush Bricken for State Representative</b>	<b>\$1000</b>
<b>Friends of Andrew Farmer</b>	<b>\$1000</b>
<b>Curtis Halford for State Representative</b>	<b>\$2000</b>
<b>David Hawk for State Representative</b>	<b>\$500</b>
<b>Gary Hicks for State Representative</b>	<b>\$1500</b>
<b>Justin Lafferty for State Representative</b>	<b>\$1000</b>
<b>Mary Littleton for State Representative</b>	<b>\$2000</b>
<b>Harold Love for State Representative</b>	<b>\$1000</b>
<b>Jason Powell for State Representative</b>	<b>\$1000</b>
<b>Johnny Shaw for State Representative</b>	<b>\$1500</b>
<b>Rick Staples for State Representative</b>	<b>\$2000</b>
<b>Rick Tillis for State Representative</b>	<b>\$2000</b>
<b>Chris Todd for State Representative</b>	<b>\$1000</b>
<b>Patsy Hazlewood for State Representative</b>	<b>\$1000</b>
<b>Susan Lynn for State Representative</b>	<b>\$2000</b>
<b>Brandon Ogles for State Representative</b>	<b>\$500</b>
<b>Karen Camper for State Representative</b>	<b>\$1000</b>
<b>John Crawford for State Representative</b>	<b>\$500</b>
<b>William Lamberth for State Representative</b>	<b>\$3000</b>

<b>Ron Gant for State Representative</b>	<b>\$1000</b>
<b>Iris Rudder for State Representative</b>	<b>\$1000</b>
<b>Jeremy Faison for State Representative</b>	<b>\$1000</b>
<b>Martin Daniel for State Representative</b>	<b>\$500</b>
<b>Darren Jernigan for State Representative</b>	<b>\$500</b>
<b>Marsh for Tennessee Business PAC</b>	<b>\$1000</b>
<b>RY-PAC</b>	<b>\$500</b>
<b>Matthew Hill for State Representative</b>	<b>\$1000</b>
<b>Jay Reedy for State Representative</b>	<b>\$1000</b>
<b>Sam Whitson for State Representative</b>	<b>\$500</b>
<b>Jerome Moon for State Representative</b>	<b>\$1000</b>
<b>TN House Republican Caucus</b>	<b>\$5000</b>
<b>TN House Democratic Caucus</b>	<b>\$2500</b>
<b>TDG-PAC</b>	<b>\$7500</b>
<b>Total</b>	<b>\$112,000</b>

**Other Corporate Contributions**

None.

**Trade Association Memberships**

- Distilled Spirits Council of the United States (DISCUS)

- Foundation for Advancing Alcohol Responsibility (FAAR)
- Greater Louisville Inc. (GLI)
- Kentucky Chamber of Commerce (KCC)
- Kentucky Distillers' Association (KDA)
- Tennessee Chamber of Commerce & Industry (TCCI)
- U.S. Chamber of Commerce (USCC)