



POLITICAL ENGAGEMENT – MAKING A POSITIVE IMPACT

Keurig Dr Pepper (KDP) is committed to sourcing, producing and distributing our beverages responsibly, while making a positive impact on our consumers, customers, communities, employees and various other stakeholders. We consider it our duty and responsibility to support this commitment through our efforts to engage in the political process and the development of public policy.

Our political activities and contributions comply with all applicable U.S. laws and regulations and related disclosure requirements. We lawfully engage in the political process through:

- **Trade Associations:** We participate in trade associations for a variety of reasons, including their ability to provide a unified voice in legislative and regulatory matters and monitor industry policies and trends.
- **Political Contributions:** We provide political contributions to U.S. federal and state political parties, committees and candidates, either directly or through our political action committee, both of which are governed by our [Political Contributions Policy](#).
- **Lobbying:** We engage in lobbying efforts to educate policy-makers and participate in public dialogue on important policy issues.

Our political advocacy efforts focus on key issues related to our Company's strategic goals, our products and other issues such as taxation, regulations and labor issues.

GOVERNANCE & OVERSIGHT

Board & Code of Conduct

As with any public company, our Board of Directors has ultimate oversight over our political engagement activities. Our Vice President of Government Affairs and our Chief Legal Officer periodically review our policies and practices regarding political activities and political contributions. The Vice President of Government Affairs periodically updates the Board of Directors on the Company's political, lobbying and other grassroots advocacy activities including political contributions.

Additionally, our Code of Conduct prohibits:

- The use of Company funds, facilities and other assets to support, directly or indirectly, any political candidate without the approval of our Vice President of Government Affairs and our Chief Legal Officer.
- Reimbursement to employees, directly or indirectly, of personal political donations.

Government Affairs Team

Our Government Affairs team, led by our Vice President of Government Affairs, is responsible for managing the Company's political engagement strategy and periodically reviews our legislative priorities and political contributions with our PAC Committee. KDP's Government Affairs team addresses industry, federal, state and local legislative and ballot initiatives, engages in lobbying efforts where appropriate and lawful, and manages our political contributions and membership in trade associations.

POLITICAL ACTION COMMITTEE

The KDP U.S. Political Action Committee (KDP PAC) was established in 2010 to provide our employees with a means to engage in the civic process and to support candidates and ballot initiatives that enable us to succeed as a Company committed to growth, integrity, innovation and value. Except for administrative expenses, our KDP PAC is funded solely through voluntary contributions from eligible employees and members of our Board of Directors who choose to participate in the political process by pooling their resources. To learn more about the factors that guide our KDP PAC's contributions, please review our [Political Contributions Policy](#).



The KDP PAC's Executive Committee has oversight over all political contributions and maintains funds in a segregated account with Treasury oversight. All contributions are administered by an independent third party.

Our KDP PAC complies with all applicable laws concerning political contributions, including laws requiring public disclosure of such contributions with the Federal Election Commission (FEC). All contributions made by our KDP PAC are reported in filings with the FEC and are publicly available on the commission's website <http://www.fec.gov>.

KDP did not solicit any KDP PAC contributions in 2019.

TRADE ASSOCIATIONS

The majority of our public policy advocacy work is done through our membership in the American Beverage Association (ABA), which is the trade association of the non-alcoholic beverage industry in the United States, as well as affiliated state-level beverage associations. These groups represent the beverage industry in the United States at the national, state and local level on issues that are of critical importance to our business, including our licensed bottlers.

Our participation in these trade associations, including membership on a trade association board, does not mean that we agree with every position a trade association takes on an issue. From time to time, our corporate positions may differ from those of the trade associations of which we are members. When we take positions that differ from our trade associations, we engage with the associations to express our views.

Every year, we disclose the trade associations to which KDP pays annual dues or membership fees, as well as those associations that received more than \$25,000 per year in non-deductible fees for federal lobbying expenditures. We will update this list on an annual basis.

Absent approval from KDP, trade associations, such as the ABA or the Consumer Brands Association, may not use company funds for independent campaign expenditures or contributions to any federal, state or local candidate, ballot measure, party committee, non-candidate organization (such as political convention host committee) or organization organized under Section 527 of the Internal Revenue Code.

CORPORATE POLITICAL CONTRIBUTIONS

U.S. law prohibits companies from contributing to candidates for federal office, but many states allow corporate contributions to state and local candidates, committees, political organizations, and ballot-issue campaigns.

Our contributions are not based on the personal preferences of individual Company leaders. We base our contribution decisions on criteria defined in our [Political Contributions Policy](#).

KDP did not make any direct state and local political contributions at the corporate level in 2018 or 2019.

LOBBYING

KDP discloses its U.S. federal, state and local lobbying activity and expenditures as required by law.