



BROWN-FORMAN

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.



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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 the previous fiscal year, 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.



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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.



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Appendix A Fiscal Year 2021

Jack Daniel's PAC Contributions

Campaign Name	Amount
Bill Beck for State Representative	\$2,000
Bob Ramsey for State Representative	\$2,500
BoWPAC	\$2,000
Briggs PAC	\$1,750
CAMPAC	\$10,000
CAS PAC	\$2,000
Chris Todd for State Representative	\$750
Committee to Elect Mike Stewart	\$500
Curtis Halford for State Representative	\$2,000
Dawn White for State Senate	\$1,750
Ed Jackson for State Senate	\$1,750
Ferrell Haile for State Senate	\$1,000
Friends of Andrew Farmer	\$750
Gary Hicks for State Representative	\$1,000
Harold Love for State Representative	\$750
Iris Rudder for State Representative	\$1,000
Jack-PAC	\$3,000
Jason Powell for State Representative	\$750
Jay Reedy for State Representative	\$750
Jeff Yarbrow for State Senate	\$1,750
Jeremy Faison for State Representative	\$500
Jerome Moon for State Representative	\$750



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Johnny Shaw for State Representative	\$750
Justin Lafferty for State Representative	\$750
Karen Camper for State Representative	\$500
Kelly Kiesling for State Representative	\$2,500
KEY PAC	\$4,000
Marsh for Tennessee Business PAC	\$750
Mary Littleton for State Representative	\$2,000
McPAC	\$10,000
Patsy Hazlewood for State Representative	\$500
Raumesh Akbari for State Senate	\$1,000
Rick Eldridge for State Representative	\$750
Rick Staples for State Representative	\$2,000
Rick Tillis for State Representative	\$2,000
Rush Bricken for State Representative	\$750
RY-PAC	\$500
Shane Reeves for State Senate	\$2,000
Steve Dickerson for State Senate	\$3,000
Susan Lynn for State Representative	\$1,000
TDG-PAC	\$5,000
Todd Gardenshire for State Senate	\$1,750
VoteKelsey.com	\$1,750
William Lamberth for State Representative	\$3,000
Total	\$85,250



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Other Corporate Contributions

Republic Party of Kentucky Building Fund - \$30,000

Trade Association Memberships

- American Distilled Spirits Alliance (ADSA)
- 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)