

Political Contributions Policy

The health of democratic societies depends on citizens being responsibly engaged in the political process.

PepsiCo employees have the right to be engaged in the political process in their individual capacity as they see fit and make political contributions of their own time and money to the candidates or parties of their choice. Of course, those efforts must not in any way suggest PepsiCo's support.

The PepsiCo Concerned Citizens Fund (CCF) receives voluntary employee contributions to make political campaign contributions to U.S. federal and state candidates, political parties, and other political committees. The CCF provides an important opportunity for PepsiCo and its employees to participate in the democratic process. Management, supervisory and other legally eligible employees and other individuals who are United States citizens or lawful permanent residents may voluntarily contribute to the CCF. Coercion of any employee to contribute to the CCF or make any other political contributions, or engage in any political activities is both unlawful and unacceptable.

PepsiCo also makes political contributions with corporate funds in some jurisdictions, such as cities and states in the United States where permitted by law.

We believe that providing financial support to responsible pro-business candidates is an important means by which we help improve the business climate, our quality of life and the society in which we live, enabling us to succeed as a company committed to integrity, innovation and value.

Details on PepsiCo's political contributions are posted on its website on an annual basis.

All contributions and support of U.S. or state candidates, political parties or other political committees from the CCF or with corporate funds must be made in accordance with applicable campaign finance and disclosure laws.

PepsiCo supports Democratic, Republican, and Independent candidates based on a multi-factor set of criteria. All criteria are considered before any decision is made, with the recognition that the candidate may not support PepsiCo's position on all policy issues.

The following criteria will be used in connection with all contributions:

- the candidate's or entity's commitment to improving the business climate;
- the candidate's commitment to the long-term public policy goals of PepsiCo;

- the location of PepsiCo facilities or employees within the candidate's district or state;
- the candidate's position on key committees where legislation of importance to PepsiCo is considered or the candidate's demonstrated leadership – or potential for leadership – within the U.S. Congress or a state legislature; and
- the candidate's overall character, integrity, personal conduct, and record of public service.

PepsiCo's public policy engagement, including its political contribution activities, are overseen by the Sustainability and Public Policy Committee of the company's board of directors.

All CCF and corporate political contributions are approved by a Corporate Affairs committee chaired by a Government Affairs & Corporate Citizenship Vice President and are included in PepsiCo's annual disclosures.

In addition, all contributions must be reviewed by the external campaign finance counsel to ensure legal compliance.

PepsiCo generally does not provide contributions from corporate funds to candidates outside the United States. Any exception to this would require a written recommendation by PepsiCo's regional government affairs representative and approval by (1) the Corporate Senior Vice President of Public Policy & Government Affairs and (2) the corporate and regional law departments to ensure strict legal compliance. PepsiCo will appropriately post any such contribution along with other political contributions on its website.

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