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Political Engagement Policy

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Political debates take many forms. One version is lobbying: Lobbying is a way for organizations – including NGOs and companies – to ensure that their views get heard, or at least considered. In the United States, political contributions to candidates – those who are running, as well as incumbents – are another way for organizations to participate in the political process. A third way is via trade associations, which lobby on behalf of the companies, organizations, causes and industries they represent. A fourth way is direct advocacy, which is central to policymaking, [as described here](#).

Because we have a diverse array of constituencies to serve – customers, distributors, bottlers, small businesses, government, community partners, shareowners and more – we participate in all of these political avenues.

We consider it our duty, and our responsibility, to make our views clear to those who have the potential to impact the laws, regulations and policies that can influence our global business.

We act responsibly in all of our political activities – as detailed below. Our Chief Public Affairs, Communications and Sustainability Officer oversees our activities. But we also go a step further, ensuring that the PIDRC (Public Issues and Diversity Review Committee) of our Board of Directors has complete visibility into all of our activities and actively reviews them. As with other public companies, our Board has ultimate oversight of our operations and performance.

Political contributions, public policy advocacy and trade association memberships in the United States are governed as follows:

ANOTHER SIP



Public Policy Engagement

Public Policy: U.S. Focus

The Coca-Cola Company
Annual & Other Reports

LATEST ON KO

\$50.17
NYSE/KO
+0.00 ▲

Quote delayed at least 15 minutes

FINANCIAL REPORTS

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Legal Compliance: Our political contributions and those of our affiliated Political Action Committees (PACs) are executed in compliance with all applicable U.S. laws, regulations and corresponding legal reporting requirements. To ensure compliance, as well as consistency, senior government relations leaders and senior legal counsel review and approve political contributions.

Board and Management Oversight: The PIDRC of our Board of Directors annually reviews and approves our advocacy efforts, including all U.S. political contributions from both PAC funds and, where allowed by applicable law, the Company's general treasury funds. Among other things, these reviews ensure that our activities align with our positions on public policies, serve the needs of our shareowners and also reflect our overall values.

In addition – and for the same reasons – the PIDRC reviews the Political Engagement Policy that you are now reading. The [PIDRC's charter](#) requires this periodic, self-imposed review.

Public Policy Agenda Alignment: In the United States, our political contributions are given to political candidates on the basis of many considerations – there is no one-size-fits-all approach. At times, the individual views of candidates we support may vary from our own, which is okay by us because our goal is not perfect philosophical alignment. Rather, we're looking for long-term, sustainable growth of our global beverage business. It is far more important to us that a candidate's values be consistent with our own when it comes to core issues that affect our business.

And it should go without saying, but the personal political preferences of our Board members, officers and other Coca-Cola executives are not a consideration. *Ever.*

Senior government relations officials update the PIDRC on our advocacy efforts regularly throughout the year. Our efforts align with relevant Risk Factors that can be found in our Annual Report on Form 10-K published under U.S. Securities & Exchange Commission rules and that is available to the public. [View the latest Annual Report.](#)

In addition, we provide a direct link on our website to our federal lobbying disclosure reports under the U.S. Lobbying Disclosure Act, 2 U.S.C. § 1601 et seq.

Political Contributions and Trade Association Membership

Each year, The Coca-Cola Company, The Coca-Cola Company Non-Partisan Committee for Good Government -- our federal Political Action Committee (PAC) – and our state PACs make political contributions in support of U.S. federal, state and local candidates for office listed in the links below. All political contributions to federal candidates were made and funded by our PAC and not from our Company's general treasury funds, because the latter is prohibited by law. Any political contributions made to state or local candidates from the Company's general treasury funds are made only where allowed by applicable law.

The Company does not make independent political expenditures, including electioneering communications, in support of the election or defeat of a particular candidate independent of that candidate or his/her campaign committee. Since we are a for-profit corporation and have contracts with the federal government, by law we are also prohibited from using Company money to make these kinds of expenditures. Therefore, we do not make independent political expenditures from our PAC or Company funds as a matter of Company policy.

[View all of the Company's and its affiliated PACs' contributions for the mid-2018 cycle.](#)

[View all of the Company's and its affiliated PACs' contributions for the 2016 cycle.](#)

[View all of the Company's and its affiliated PACs' contributions for 2015.](#)

2017 YEAR IN REVIEW



THE FIZZ

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10 Things You Didn't Know About Coca-Cola's...

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2016 Sustainability Highlights

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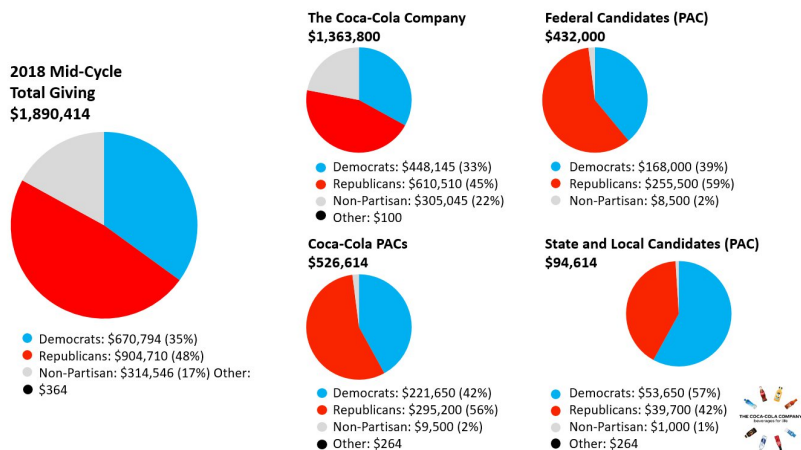
Coke Hires 5,000 Veterans Ahead of Schedule

[View all of the Company's and its affiliated PACs' contributions for 2014.](#)

[View all of the Company's and its affiliated PACs' contributions for 2013.](#)

[View all of the Company's and its affiliated PACs' contributions for 2012.](#)

* Below illustration and accompanying data reflect the mid-2018 election cycle contributions (November 9, 2016- December 31, 2017). This information will be updated after the close of the election cycle.



Public Disclosures: We strive to be as transparent as possible, in all aspects of our business. This includes our public policy engagement activity. To further our goal of transparency, and in keeping with all legal requirements in this area, we post the following on our web site: this policy; semi-annual reports of all U.S. political contributions, including those to any entities organized under 26 U.S.C § 501 and § 527 of the Internal Revenue Code; and a list of U.S. trade associations that received more than \$25,000 in non-deductible fees for federal lobbying expenditures over the course of the year.

§ 501(c)(4) Organizations: The Company does not support groups organized under § 501(c)(4) of the Internal Revenue Code for electoral purposes. The Company does, however, support such organizations for public policy and social welfare purposes and voluntarily discloses that information below for 2017. This information will be updated on an annual basis.

- Congressional Black Caucus Institute: \$25,000

§ 527 Organizations: The Company does support groups organized under § 527 of the Internal Revenue Code. Below we voluntarily disclose that information below for 2017 and will update this list on an annual basis:

- Democratic Attorneys General Association: \$25,000
- Democratic Governors Association: \$185,000
- Republican Attorneys General Association: \$100,000
- Republican Governors Association: \$312,500
- Republican State Leadership Committee: \$31,500

Trade Associations: As a leader in the global beverage business, we support trade groups and other organizations that represent a broad spectrum of views on industry and policy issues. Mission consistency is important to us, and we review our participation – with this in mind – on a regular basis.

While we don't always agree with the views of these groups, nor do we always agree with our industry peers, we are fully committed to collaborative problem-solving and to working within these political frameworks. We believe that's the best way to address a problem, have the greatest impact, and get to the best outcome.

How we decide which trade associations to join or align: Our group president of our North America business, together with senior representatives from our corporate public affairs and communications team, oversee and approve U.S. trade association memberships. We define “trade associations” as organizations that represent the non-alcoholic beverage industry, the broader food and consumer goods industry, key customer and supplier industries and the overall business community.

In compliance with U.S. law, we disclose the portion of the dues and special assessment payments we make to trade associations that are non-deductible and used for federal lobbying expenditures in quarterly lobbying reports. Amounts attributed to lobbying have been identified by those organizations as non-deductible expenditures under § 162(e)(1) of the Internal Revenue Code. Below we voluntarily disclose the list of trade associations that received more than \$25,000 in non-deductible fees for federal lobbying expenditures in 2017 and will update this list on an annual basis:

- American Beverage Association: \$525,536.28
- Association for Convenience & Fuel Retailing: \$45,900
- Grocery Manufacturers Association: \$330,636.50
- Retail Industry Leaders Association: \$81,250
- U.S. Chamber of Commerce: \$340,000

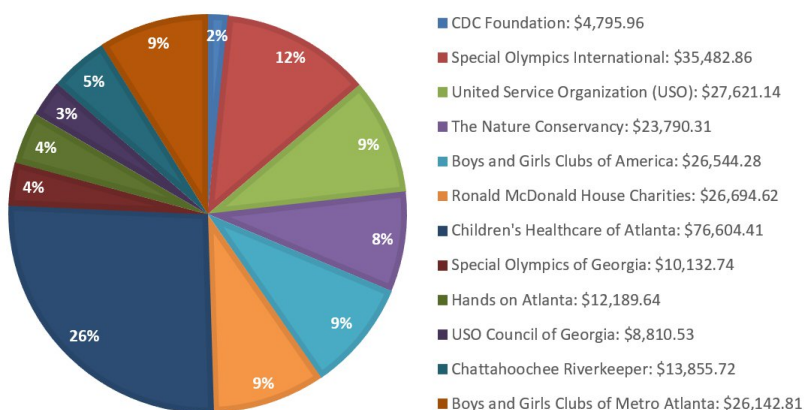
More information about how much we spent on lobbying as well as the specific issues on which we lobbied in a given quarter can be found in our federal quarterly lobbying reports (see “Learn More” links below).

Additionally, we expect any third party groups with which we are affiliated to report political contributions – just as we do and as the law requires.

Coca-Cola PAC Match Program

Coca-Cola PAC members can designate charitable organizations to receive contributions in a dollar amount equal to their year-end PAC total. Any gifts to the matched organization come from a general corporate treasury fund – neither The Coca-Cola Company nor the individual PAC contributor receives a tax deduction for these donations. The Coca-Cola PAC Match program provides support to organizations that focus on the environment, well-being and community involvement.

2017 COCA-COLA PAC MATCH PROGRAM: \$315,721.07



[Learn More](#)

[View](#) 2018 mid-year contributions in the LD-203 Lobbying Contributions Report

- [View](#) 2017 year-end contributions in the LD-203 Lobbying Contributions Report
- [View](#) 2017 mid-year contributions in the LD-203 Lobbying Contributions Report
- [View](#) 2016 year-end contributions in the LD-203 Lobbying Contributions Report
- [View](#) 2016 mid-year contributions in the LD-203 Lobbying Contributions Report
- [View](#) 2015 year-end contributions in the LD-203 Lobbying Contributions Report
- [View](#) 2015 mid-year contributions in the LD-203 Lobbying Contributions Report
- [View](#) 2014 year-end contributions in the LD-203 Lobbying Contributions Report
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- [View](#) 2013 year-end contributions in the LD-203 Lobbying Contributions Report
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COMPANY INFORMATION

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- Coca-Cola Store

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- #CocaColaRenew
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- Diversity & Inclusion
- Food
- History
- Innovation
- Jobs
- Sports
- Sustainability

BRANDS

- Coca-Cola
- Diet Coke
- Coca-Cola Zero Sugar
- Sprite
- Fanta
- Mello Yello
- Surge
- Powerade
- glacéau vitaminwater
- Dasani
- glacéau smartwater
- Honest Tea
- Gold Peak
- Zico
- Simply Beverages
- Minute Maid
- Owalla
- fairlife
- Del Valle
- Ciel
- Georgia
- [View All Brands »](#)

POLICIES

- About our Ads
- California Transparency in Supply Chain Act
- Cookie Policy
- DMCA Policy
- House Rules
- Privacy Policy
- Terms of Use

The Coca-Cola Company (NYSE: KO) is a total beverage company, offering over 500 brands in more than 200 countries and territories. In addition to the company's Coca-Cola brands, our portfolio includes some of the world's most valuable beverage brands, such as AdeS soy-based beverages, Ayataka green tea, Dasani waters, Del Valle juices and nectars, Fanta, Georgia coffee, Gold Peak teas and coffees, Honest Tea, innocent smoothies and juices, Minute Maid juices, Powerade sports drinks, Simply juices, smartwater, Sprite, vitaminwater and ZICO coconut water. We're constantly transforming our portfolio, from reducing sugar in our drinks to bringing innovative new products to market. We're also working to reduce our environmental impact by replenishing water and promoting recycling. With our bottling partners, we employ more than 700,000 people, helping bring economic opportunity to local communities worldwide.

The fairlife® brand is owned by fairlife, LLC, our joint venture with Select Milk Producers, Inc., and fairlife's products are distributed by our Company and certain of our bottling partners.