

Business Unit: Communications and Public Affairs (COPA) – Government Affairs	Effective Date: March 8, 2018 Note: Printed copies of policy are considered current only on date printed. Go to MY HR>Policies for most current version.
<i>Political Activity and Government Affairs Policy</i>	Contact/Questions: GovernmentAffairs@bestbuy.com
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A. Overview

Audience:

This policy applies to all employees in the U.S. that are full-time, part-time, and occasional/seasonal, including employees of Best Buy’s U.S. affiliates or subsidiaries. This policy also applies to contingent workers and contracted workers in accordance with their employer's contractual obligations to Best Buy.

Summary:

While participation in politics is a personal choice, U.S. federal, state and local laws define the parameters of permissible activity. The Best Buy Government Affairs Department represents all Best Buy entities in governmental processes and serves as the only authorized representatives of Best Buy in the public policy arena. This policy seeks to educate employees on the range of permissible activity as well as conduct that is strictly prohibited or otherwise requires pre-approval. It represents the mandatory minimum requirements to be followed by Best Buy employees and contractors and addresses the following topics:

- **Lobbying**
- **Grassroots & Employee Advocacy Requirements**
- **Political Campaign Volunteering & Personal Contributions**
- **Voting**
- **Conducting Business with Government Entities**
- **Gifts, Gratuities and Payments to Public Officials**
- **Corporate Funding in Support of Candidates & Issues**
- **Trade Organizations**
- **Employee Political Forum (PAC)**
- **Public Policy Priorities**

Please also refer to the following resources and policies:

- **Code of Business Ethics**
- **Corporate Responsibility Report**
- **Solicitation & Distribution Policy**

For guidance on international government interactions, please see the Best Buy Anti-Corruption Policy.

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Purpose:

This policy seeks to educate employees on political activity as it pertains to employment with Best Buy as a U.S.-domiciled company. Best Buy encourages employees to engage in the political process, both personally and professionally in accordance with the law and this policy. U.S. federal and state laws regulate certain political activities of U.S.-domiciled corporations and its employees and certain laws compel disclosure pertaining to engagement with government entities, officials, candidates, and committees. Failure to comply with these laws, even if that failure is inadvertent and caused by lack of awareness of the law, could result in a legal violation, civil and/or criminal penalty, and reputational risk to the Company. To that end, the purpose of this policy is to clarify the legal and ethical obligations associated with political activity as it relates to your employment with Best Buy.

For purposes of this policy, the term “government official” applies to any elected or appointed official, or any other official or employee, of any foreign, federal, state, or local legislature, executive branch agency, or other government agency, commission, board, authority, public fund, or any other governmental or quasi-governmental entity.

Although comprehensive in scope, the policy is intended to be an overview and does not address every instance where political implications may impact an employee’s job. For questions related to this policy, employees should contact GovernmentAffairs@bestbuy.com.

B. Responsibilities

Employees

- Know, understand, and abide by the policy.
- Ask questions if unclear about the intent or application of the policy.
- Be a proactive partner in sustaining a culture that is respectful, ethical and compliant.

Leaders

- Lead by example: Know, understand, and abide by the policy.
- Create and sustain a work environment that treats all people with respect, is ethical, reflects our values, is compliant with Best Buy policies and is safe to raise questions.
- Hold employees accountable for violation of policies.



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C. Requirements

Lobbying

Lobbying involves making contact with government officials in an attempt to influence legislation or regulatory activity and in some cases procurement activity at the federal, state or local level. Federal law requires companies to register and report lobbying activity in certain instances. Best Buy files lobbying reports, copies of which may be viewed at <http://lobbyingdisclosure.house.gov> or http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm. States and local governments may also have their own lobbying, registration and reporting requirements.

Examples of lobbying activities can include: attempting to influence legislation, formal rulemaking or ratemaking, influencing the decision on the award or terms of a government contract, and grassroots lobbying.

As a Best Buy employee:

- Employees of Government Affairs (and other employees pre-authorized by Government Affairs) are the only employees that may engage in lobbying. In general, employees should not be engaging in lobbying activity on behalf of Best Buy unless done in conjunction with the Government Affairs Department and with pre-approval from the Head of Government Affairs.
- If employees believe their job responsibilities require interaction with government officials, such employees are required to seek pre-approval from the Head of Government Affairs.
- Employees may not invite candidates or government officials to a Best Buy facility without prior approval from the Head of Government Affairs.
- Unless part of an approved grassroots lobbying effort, employees must avoid communicating or acting in a manner that could mislead others into believing such employees' personal views are those of the company.
- Employees must obtain prior approval from Government Affairs prior to retaining any outside consultant to engage in lobbying activities.

Grassroots & Employee Advocacy Requirements

Best Buy may engage in “grassroots” lobbying activity by communicating with employees or a segment of the public for purposes of influencing legislation or a rulemaking. Government Affairs

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is responsible for advocacy efforts concerning industry or public policy issues of interest to Best Buy.

Under the direction of Government Affairs, Best Buy or one of its subsidiaries may request that employees contact state or federal legislators regarding an issue of critical importance to the business. Such requests will generally include background information about the issue, its importance to Best Buy and a suggested message for employees to convey to their legislator. If applicable, Government Affairs may also share information on relevant state or local lobbying laws as prepared by Best Buy legal counsel.

As a Best Buy employee:

- If requested by Best Buy to participate in grassroots initiatives, employees’ participation is encouraged but is never required as a condition of employment.
- No employee may engage in grassroots lobbying activities on behalf of Best Buy without prior approval from the Head of Government Affairs.
- From time to time, Best Buy (as represented by senior management and Government Affairs) may organize events to educate employees or support community initiatives related to government. Such events must be approved by the Head of Government Affairs.

*See www.bluegrassrootsnetwork.com for additional information.

Political Campaign Volunteering & Personal Political Contributions

When a Best Buy employee participates in a political campaign as a candidate, volunteer, financial sponsor or otherwise the employee is participating as a private citizen and not as a representative of Best Buy. Employees providing financial support to a political candidate or issue are urged to familiarize themselves with state laws and contribution limitations. In some states, certain employees may be required to disclose their personal contributions. Affected employees may include members of Best Buy Board of Directors, Executive Officers, and employees contracting with government officials. Immediate family members of affected employees may also be impacted by these laws. State and federal laws require that all political contributions – whether financial (e.g., in the form of a corporate check or a purchase of tickets to a political fundraiser) or in-kind (e.g., the use of company personnel or facilities or donation of product or services) – are reported to proper election authorities and public disclosure is often required. In some instances, such contributions are illegal. All donations --including products or services --to political entities require close coordination with Best Buy Government Affairs and must be discussed with Head of Government Affairs prior to being made.



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As a Best Buy employee:

- While engaging in personal political activities, Best Buy employees must do so as an individual and may not hold themselves out as representing Best Buy, or in a manner which could be perceived as representing Best Buy. Any overt, visible, and partisan political activity (including use of corporate title) that would cause someone to believe that an employee’s actions reflect the views or positions of Best Buy requires pre-approval by Government Affairs.
- Employees may not perform campaign activities on company time and are prohibited from using company property or resources (e.g., computers, email, phones) for such activities.
- If your store or location is approached about a contribution (including donations of equipment or other resources) to a political campaign or organization, please contact the Government Affairs team prior to making any commitment.
- Best Buy shall not directly or indirectly reimburse or otherwise compensate any person for his or her personal political contributions (see also Best Buy Employee Political Forum (PAC), below).
- See also the Best Buy Solicitation and Distribution Policy.

Voting

Best Buy promotes the importance of voting through its “Turn up the Vote” initiative and encourages all employees to vote on Election Day.

As a Best Buy Employee:

- Employees can find information about voting on www.bluegrassrootsnetwork.com or by contacting their local government offices.
- Each employee should talk with his or her manager about Election Day plans to minimize disruption to schedules at home and at work.

Conducting Business with Government Entities

In an effort to prevent bribery and corruption, both federal and state laws regulate the manner in which companies may conduct business with government entities. Some states and localities have enacted so-called “pay-to-play” laws, which may require Best Buy to report certain information, including personal political contributions of covered employees and their families, or limit the scope of business transactions with governmental entities if these covered individuals make or solicit political contributions to a candidate campaign in that jurisdiction. To ensure



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compliance with applicable laws, it is imperative that employees understand the instances where personal contributions may impact their business activities and trigger compliance obligations for Best Buy.

As a Best Buy employee:

- Employees may not make a political contribution to obtain or retain business or to obtain any other improper advantage.
- Prior to making or soliciting political contributions at the state or local level (or to a state or local official running for federal office), employees should contact the Legal Department for additional guidance on pay-to-play laws specific to their business activities and to report applicable activity.

Gifts, Gratuities and Payments to Public Officials

In connection with Best Buy Code of Business Ethics, Anti-Corruption Policy, and in accordance with applicable federal, state, and local laws, employees are strictly prohibited from giving gifts, gratuities or anything of value to influence a government official or to advance a particular business. This prohibition extends to anything that personally benefits the individual to whom it is given, including meals, entertainment, travel, lodging, and any other items of value to the recipient. In no event should any employee provide any such items to a government official (federal, state or local public officials, and in some cases their spouse or children), without the prior approval of Government Affairs and the Legal Departments. Employees must strictly comply with these policies to ensure their conduct complies with legal requirements and avoids the appearance of impropriety.

As a Best Buy employee:

- Due to sensitive and complex nature of these prohibitions, employees should consult Government Affairs for advice prior to interacting with government officials, their spouses, or children in order to avoid inadvertent violations of company policy and applicable law.

Corporate Funding in Support of Candidates and Issues

As allowed by law, Best Buy may provide corporate funding to candidates and/or issue campaigns that align with the company’s business objectives and public policy goals.



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When deciding whether to support a particular candidate or campaign, the company manages the process as follows:

Disclosure and Corporate Governance

Best Buy discloses corporate funds in compliance with applicable laws and discloses such corporate expenditures via its Political Activity & Public Policy Report each year. This information is reviewed annually by the Nominating, Corporate Governance and Public Policy Committee of the Best Buy Board of Directors.

The Contributions Steering Committee, comprised of five senior executives – including a representative from the Best Buy Legal Department, a representative of Best Buy Retail and three other leaders, meets quarterly, or as needed, to review and approve corporate funding for contributions or expenditures (over \$5,000) pertaining to:

- Candidates, political parties or political organizations;
- Ballot campaign initiatives;
- Independent expenditures;
- Any electioneering communications on behalf of federal, state or local candidate.

Selection Criteria:

The Contribution Steering Committee will evaluate the following criteria when considering potential recipients of corporate funds:

- Business impact – including the interests of the company, employees, shareholders and customers
- Public Policy goals – including the recipient’s ability to positively impact one or more of the Best Buy policy priorities
- Alignment with Best Buy core values

As a Best Buy employee:

- Government Affairs works to educate employees on Best Buy political activity and policy through online learnings, group meetings, communications and individual conversations.
- Feedback from employees is encouraged.
- Employees who would like to learn more about Best Buy political engagement should contact Government Affairs.

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- Employees may not cause Best Buy to make political contributions—which include monetary contributions from company funds, use of corporate personnel or facilities, and donations of equipment or other resources—without obtaining prior approval from Government Affairs and Legal.

For more information, please see Best Buy Political Activity & Public Policy Report.

Trade Organizations

Best Buy belongs to several business and trade organizations that support and lobby on behalf of various public policy initiatives. Best Buy Government Affairs monitors the use of dues or payments to trade associations and other organizations to ensure consistency with the company’s stated policies, practice, values and long-term interests. For more information on Best Buy memberships in trade organizations, please see Best Buy Political Activity & Public Policy Report.

As a Best Buy employee:

- Employees should notify Government Affairs if a business or retail team is considering joining a trade organization or association that engages in lobbying activity.

Best Buy Employee Political Forum (Best Buy PAC)

The political action committee (PAC) is Best Buy’s federally-registered non-partisan political action committee governed by the Federal Elections Campaign Act. The PAC allows eligible employees to pool their personal funds on a voluntary basis to help elect candidates to Congress who appreciate and understand the issues important to Best Buy and the retail industry.

The PAC is governed by a Board composed of a diverse group of Best Buy PAC members. The PAC Board has term limits to allow additional opportunities for PAC members to participate in the review and approval of contributions and direction of the PAC. The PAC’s activity, including all receipts and disbursements are reported regularly to the Federal Election Commission (FEC) and available for public viewing at www.fec.gov. Nothing in this Political Activity & Government Relations Policy is intended to prohibit the activities of the PAC or the ability of eligible employees to participate in the PAC as allowed by federal law.

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As a Best Buy employee:

- Participation in the PAC is completely voluntary and at the discretion of eligible employees as allowed by federal law.
- Employees will not be favored or disadvantaged based on their decision to join or not join the PAC.
- No employee may cause the PAC to make a political contribution without obtaining prior approval from Government Affairs.
- Neither the company nor the Best Buy PAC may reimburse an individual or entity for making political contributions.

Best Buy Public Policy Priorities

Each year, under the direction and approval of the Head of Government Affairs, the company develops public policy positions that have a direct impact on our business. Government Affairs manages these issues throughout the local, state and federal legislative sessions. Consistent with state and federal laws, Best Buy discloses all activities and expense related to lobbying. Federal lobbying reports can be found at:

http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm or <http://lobbyingdisclosure.house.gov/>.

For additional information, please see <https://corporate.bestbuy.com/advocacy/> and the Best Buy Political Activity & Public Policy Report.

Non-Compliance

Employees who violate this policy may be subject to disciplinary action up to and including termination and/or, if applicable, legal action.

Reservation of Rights

This Policy is not intended to be a contract. Best Buy reserves the right in its sole discretion to interpret the provisions of this Policy, vary from them, change them, or rescind them, unless prohibited by applicable law.

D. Reference

Policy Owner(s): Manager, COPA-Public Affairs

Policy Sponsor(s): Chief Communications Officer and Public Affairs

