

U.S.
Political
Activity &
Public
Policy
Report
2018

Best Buy Co., Inc.

2018

Best Buy engages in the political process by developing and advocating public policy positions that directly impact our business, employees, customers, shareholders and communities. As a commitment to transparency, Best Buy discloses our efforts and priorities and any use of corporate funds for political purposes.



Introduction

This report describes the company's primary methods of advocacy and political giving, including contributions made to political candidates and organizations in the United States. This report also provides an overview of the criteria and procedures that Best Buy follows when determining how to allocate funding to candidates, political parties or political organizations; ballot campaign initiatives; independent expenditures; and any broadcast ads mentioning a candidate (electioneering communications) on behalf of a federal, state or local candidate. Best Buy maintains a separate political activity and government affairs policy for employees to ensure compliance with our own requirements and those required by law. This report and the Best Buy Political Activity & Government Affairs Policy are reviewed annually by the **Nominating, Corporate Governance and Public Policy Committee of the Best Buy Board of Directors**.

Corporate Funding in Support of Candidates & 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. Contributions are made without regard to the personal political preferences of company executives. Best Buy complies with all federal, state and local laws concerning contributions of corporate funds to political candidates and ballot initiatives.

As is normally the case, **Best Buy did not make any political contributions directly to candidates in 2018.**

Contributions Steering Committee:

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 as needed, to review and approve corporate funding for contributions over \$5,000 pertaining to:

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

Selection Criteria:

All candidates, organizations and issue campaigns must meet several criteria before Best Buy will consider contributing corporate funds. The Contributions Steering Committee evaluates 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



For more information, please see [The Best Buy Political Activity & Government Affairs Policy](#).

Political Contributions in 2018:

Best Buy did not make any political contributions directly to candidates in 2018. In connection with Best Buy's selection criteria, the company may decide to provide financial support to certain candidates as allowed by law.

The organizations below received funding from Best Buy in 2018. Depending on their individual missions and tax classification under the Internal Revenue Code, such organizations may lobby and/or educate the public on issues of public importance or participate in election campaigns for government offices or political organizations. The Internal Revenue Service (IRS) may require these organizations to file periodic reports concerning their activity, which can be located on the IRS website.

Organization	Amount
Democratic Governors Association	\$50,000
Republican Governors Association	\$50,000
Democratic Legislative Campaign Committee	\$25,000
Republican Legislative Campaign Committee	\$25,000
Democratic Attorneys General Association	\$15,000
Republican Attorneys General Association	\$15,000

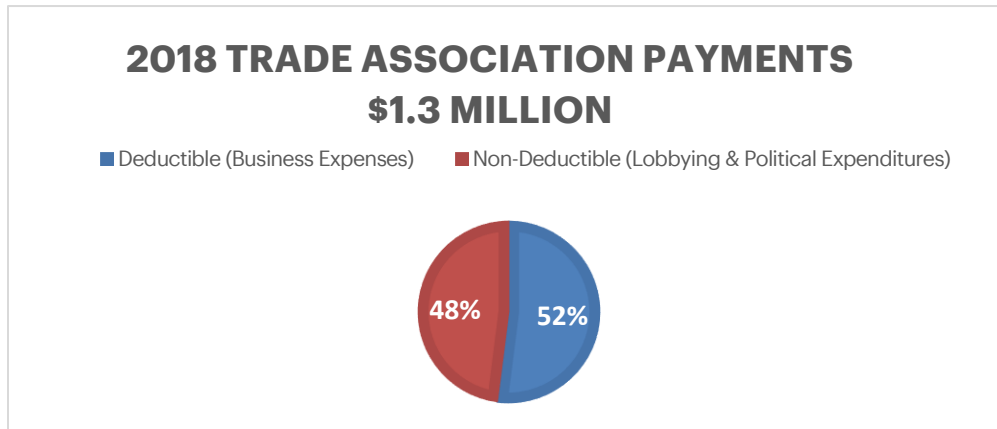
Best Buy did not make any contributions that could be considered independent political expenditures or that supported electioneering communications.



Trade Organizations

Best Buy belongs to nonpartisan trade organizations that support and lobby on behalf of various public policy initiatives. Best Buy discloses annually the total amount paid in membership dues to major trade organizations and the percentage of those dues that are considered non-deductible lobbying/political expenditures. Best Buy monitors the use of dues or payments to trade associations and other organizations to ensure consistency with the company’s stated policies, practices, values and long-term interests.

The following is a list of major trade organizations to which Best Buy paid dues in 2018:



Alabama Retail Association
 Alliance of Wisconsin Retailers
 Arizona Retailers Association
 Arkansas Grocers and Retail Merchants Association
 Asociación de Comercio al Detal (Puerto Rico)
 Business Roundtable
 California Business Properties
 California Chamber of Commerce
 California Retailers Association
 Custom Electronic Design & Installation Association
 Colorado Retail Council
 Connecticut Retail Merchants Association
 Consumer Technology Association
 Delaware Retail Council
 Electronic Security Association
 Entertainment Merchants Association
 Florida Chamber of Commerce
 Florida Retail Federation
 Georgia Retail Association
 Idaho Retailers Association
 Illinois Retail Merchants Association
 Indiana Retail Council

International Council of Shopping Centers
 Iowa Retail Federation
 Kentucky Retail Federation
 Louisiana Retailers Association
 Maryland Retailers Association
 Michigan Retailers Association
 Minnesota Business Partnership
 Minnesota Chamber of Commerce
 Minnesota High Tech Association
 Minnesota Retailers Association
 Mississippi Retail and Grocers Association
 Missouri Retailers Association
 Montana Retail Association
 Nebraska Retail Federation
 New Hampshire Retail Association
 New Jersey Retail Merchants Association
 New Mexico Retail Association
 New York Metropolitan Retailers Association
 North Carolina Retail Merchants Association
 North Dakota Retail Association
 Ohio Council of Retail Merchants
 Oklahoma Retail Merchants Association
 Oregon Business and Industry
 Pennsylvania Retail Association

Retail Gift Card Association
 Retail Association of Maine
 Retail Association of Nevada
 Retail Council of New York State
 Retail Industry Leaders Association
 Retail Merchants Association of Hawaii
 Retailers Association of Massachusetts
 Rhode Island Retail Federation
 Richfield (MN) Chamber of Commerce
 Service Contract Industry Council
 South Carolina Retail Association
 South Dakota Retailers Association
 Tennessee Retail Association
 Texas Retailers Association
 The Kansas Chamber of Commerce
 Utah Retail Merchants Association
 Vermont Retail and Grocers Association
 Virginia Retail Federation
 Washington Retail Association
 West Virginia Retailers Association
 Wyoming Retail Association



Other Organizations

Best Buy works with a number of additional organizations, including non-profits that provide guidance and expertise on policy-related issues and practices. Some of these include:

- Alliance to Save Energy
- Business for Social Responsibility
- Ceres
- Council of Institutional Investors
- Council on State Taxation
- Employers for Renewable Energy
- Minnesota Center for Fiscal Excellence
- Minnesota State Society of Washington, D.C., Inc.
- National Center for Electronics Recycling
- National Conference of State Legislatures Foundation
- National Governors Association
- Public Affairs Council
- Responsible Business Alliance
- Responsible Mineral Initiative
- State Government Affairs Council
- Tax Foundation
- United States Conference of Mayors
- U.S. China Business Council
- World Resources Institute

Best Buy Employee Political Forum (PAC)

The Best Buy PAC is a federally-registered nonpartisan political action committee governed by the Federal Elections Campaign Act. The PAC allows eligible employees to pool their personal funds on a voluntary basis with other employees to help elect candidates who appreciate and understand the issues important to Best Buy and the retail industry. Members of the Best Buy Board of Directors are also invited to contribute personal funds to the Best Buy PAC.

The PAC is governed by a Board composed of a diverse group of Best Buy employees. The PAC Board has term limits on board members to allow additional opportunities for PAC members to participate in the review and approval of contributions and direction of the PAC.

Information related to the Best Buy PAC, including all receipts and disbursements, is reported regularly to the Federal Election Commission and is available for public viewing by visiting www.fec.gov.

Best Buy Public Policy Priorities

Each year, under the direction and approval of the Head of Government Affairs, Best Buy develops public policy positions based on current issues that may have a direct impact on our business. The Government Affairs team manages these issues throughout the local, state and federal legislative sessions. Our quarterly federal lobbying reports can be viewed at http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm or <http://lobbyingdisclosure.house.gov/>.

View the quarterly federal lobbying reports for the most current year here:

[2018 Q1 Lobbying Report](#)

[2018 Q2 Lobbying Report](#)

[2018 Q3 Lobbying Report](#)

[2018 Q4 Lobbying Report](#)

In 2018, public policy priorities for Best Buy included:

Trade: Support trade policies that address unfair trade practices of our trading partners; seek alternative remedies to tariffs to minimize the impacts to American consumers and businesses.

State E-fairness: Support passage of state e-fairness legislation, which would allow retailers to compete on a level playing field while serving customers across all selling channels.

Workforce Issues: Support policies that provide employers the flexibility to attract and retain talent by offering competitive wages and benefits and flexible scheduling.

Financial Services: Protect critical credit offerings and continue to reform debit and credit interchange system to reduce expenses and increase competition in payments market.

Cybersecurity, Data Privacy & Internet of Things: Committed to safeguarding customer data and ensuring a relationship with customers that better understands and serves their needs and interests.

Supply Chain & Infrastructure: Support investments to the nation's multi-modal infrastructure and the free flow of commerce while promoting a safe and secure supply chain.

Energy & Environment: Promote the responsible recycling of electronic waste and policies that encourage energy efficient design and innovation.

Emerging Technologies & Innovation: Support policies that allow for the emergence of new, innovative technologies and products that improve consumers' lives.

Additional Information

For questions related to this report or for additional information political policies maintained by Best Buy, please contact GovernmentAffairs@bestbuy.com.

