



# Walgreens Boots Alliance

**Policy number:** WBA PEC-1

**Policy title:** Political engagement and contributions (U.S. only)

**Issue date:** 30 August 2019

**Version:** 2.2

**Owner:** WBA Senior Vice President, Global Chief Public Affairs Officer

**Description:** This policy sets forth basic principles concerning political contributions, lobbying activities and trade association memberships of Walgreens Boots Alliance, Inc. (“WBA”) and its subsidiaries in the U.S.

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## 1. Purpose

This Political Engagement and Contributions policy sets forth basic principles concerning political contributions, lobbying activities and trade association memberships of Walgreens Boots Alliance, Inc. (“Walgreens Boots Alliance”) and its subsidiaries in the U.S. Walgreens Boots Alliance conducts its political activities in the U.S. primarily through its subsidiary, Walgreen Co. (“Walgreens”).

## 2. Scope

This policy applies to Walgreens Boots Alliance (“WBA”), its Businesses and its Corporate function.

## 3. Core principles

We engage in the political and policymaking processes in the U.S., at the federal, state and local levels, to participate in democratic self-government and to have a voice in public policy debates that have a direct impact on our company. We exercise our responsibility to actively participate in the political process by supporting candidates whose policies and goals are consistent with our purpose to help people across the world lead healthier and happier lives, and that are aligned with the interests of our businesses, our customers, our communities, and our stockholders. Policies on which we focus include reimbursement for pharmacist-delivered clinical services, the expansion of the role of pharmacists in the healthcare delivery system and retail business regulation and taxation.

We work to advance this agenda by: (1) contributing to candidates, parties and political organizations both directly from corporate funds and through the Walgreen Co. Political Action Committee; (2) supporting a government relations program which aims to educate elected officials and regulatory agencies on key public policy issues; and (3) membership in trade associations.

All of our political and advocacy activities are focused on promoting the interest of our company, without regard to the personal political preferences or affiliations of any of our directors, officers or employees.

## 4. Governance and Oversight

The Nominating & Governance Committee of the Board of Directors of Walgreens Boots Alliance is responsible for the oversight of policies and activities regarding political advocacy and contributions. The Nominating & Governance Committee, which is



comprised entirely of independent directors, has jurisdiction over these activities, and receives and reviews regular updates on these efforts on at least an annual basis.

The Walgreens Government Relations department is responsible for the day-to-day implementation of political advocacy and contributions consistent with the Nominating & Governance Committee's oversight. The management of our participation in the political and policy-making processes, and of the Government Relations department, is the responsibility of the Senior Vice President, Global Chief Public Affairs Officer. The Government Relations department relies on inside and outside legal counsel, when appropriate, to help ensure full compliance with the laws governing these activities and with this and other WBA corporate policies, including but not limited to the WBA Anti-bribery and Anti-corruption policy.

## **5. Activities**

### **5.1 Political Contributions**

As corporations, Walgreens Boots Alliance and its subsidiaries are prohibited from making direct contributions to candidates in federal elections and in nearly half of all states. In compliance with state and local law, we can contribute to candidates for elected office, to political parties and organizations, and for ballot measures in state and municipal elections that allow contributions from corporations.

Walgreens Boots Alliance authorizes an annual corporate political contributions budget that is administered by the Government Relations department. All corporate contributions are reviewed for compliance with applicable law and are approved by the senior member of the Government Relations department and internal legal counsel. Without exception, all corporate contributions from the approved budget, must be authorized by the Government Relations department leadership. We do not engage in independent expenditures in support of or in opposition of candidates for elected office.

Through its subsidiary, Walgreen Co., Walgreens Boots Alliance sponsors the Walgreen Co. Political Action Committee (PAC), which allows employees to voluntarily pool their resources for political contributions. In compliance with applicable law, the PAC supports candidates for federal and state office, as well as contributing to political parties and other political committees.

The PAC is governed by a board of directors consisting of Walgreens employees from both corporate and operational leadership. All PAC contributions are made in consultation with the board of directors of the PAC.



## 5.2 Lobbying

We take positions consistent with the philosophy described above on legislative and policy issues pending before federal, state and local governments that impact our healthcare, pharmacy or retail businesses. Through this effort, we provide information, analysis and opinions to legislators and government leaders to allow for informed and balanced decision-making and to help ensure that elected officials understand our position on legislative and regulatory issues, and the impact their policy choices can have on our businesses, our customers, our communities, and our stockholders. The Government Relations department represents us before these policymakers. Any interaction with elected officials or their staff on behalf of the corporation must be authorized by the Government Relations department leadership.

## 5.3 Trade Associations

As part of our engagement in the public policy process, we participate in a number of industry, trade and business associations representing the interests of the healthcare, pharmacy and retail industries and the broader business community. Engaging with other business and industry participants enables us to gain further perspective on and understanding of policy issues that affect our businesses. As is always the case with these broader coalitions, we may not always support every position taken by these organizations or their other members; however, we believe our participation in these organizations is important to the advancement of our employees' professional development and to promoting public policy objectives of importance to our businesses, our customers, our communities and our stockholders.

## 6. Compliance and Disclosure

We are committed to complying with all applicable laws relating to political contributions and lobbying activities, including disclosure and reporting of such activities. The activities described in this Policy are conducted in a transparent manner and consistent with legal and regulatory requirements.

The Government Relations department receives regular training on laws impacting lobbying and campaign contributions. In addition, as appropriate, other employees that interact with government officials and staff receive customized training to help ensure compliance with applicable government ethics and campaign finance laws in the jurisdiction(s) where those interactions occur.



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In fiscal 2017, Walgreens Boots Alliance began disclosing on its website corporate and Walgreen Co. PAC contributions to political candidates, ballot measures, and political organizations, along with dues payments to trade associations or other policy-based organizations where the cost of the membership exceeds \$50,000 per calendar year. Walgreens Boots Alliance also discloses on its website copies of its U.S. federal lobbying reports. All this information is updated semi-annually and remains available on the WBA website on a rolling five-year basis.