



Civic policy: General Mills Political Contributions and Activities

Advocacy and lobbying

We comply with lobbying regulations where applicable and are registered as a lobbying entity at the [U.S. federal level](#), and in [Minnesota](#) and [California](#).

Trade associations and independent groups

It's important to partner with others to achieve policy goals. Trade associations and groups serve this purpose and also offer professional development, best-practice sharing and business support services. We're active members in many associations worldwide.

Some of the major trade associations to which we belong, primarily for purposes of public policy advancement, include international organizations like [Food and Consumer Products of Canada](#) and the [Food and Drink Federation of the United Kingdom](#); organizations focused on U.S. public policy like the [Consumer Brands Association](#) and the [National Association of Manufacturers](#); and state/provincial and local chambers of commerce and manufacturing organizations, like the [Minnesota Chamber of Commerce](#) and the [Minnesota Business Partnership](#).

We report additional detail about our largest U.S. trade association memberships annually, available [here](#).

We are not members of, nor fund, any tax-exempt organization in the U.S. that writes and endorses model legislation.

Guiding employee activity

We require employees to follow applicable laws and regulations when engaging in political activity.

Campaign finance and political action committees

Sometimes we support the legislative process by contributing to candidates and organizations. We recognize how important accountability and transparency is, so we disclose a list of our political contributions twice a year on our website and have an archive of past contributions.

Our policy describes our procedures for using corporate funds for political contributions. The Public Responsibility Committee of our board of directors reviews our policy. We disclose a list of our political contributions semiannually on our website and provide an archive of past years. Employees complete annual business conduct certification, ensuring compliance with our policy.

In 1976, our employees established the General Mills Political Action Committee (G-PAC), which is run by employees and uses employee funds to make political contributions to federal, and in limited cases, state political candidates.

We pay the costs of administering the G-PAC, but we do not make contributions on behalf of the company through the G-PAC.

All transactions by the General Mills Political Action Committee are completely transparent and available on the [Federal Election Commission website](#).



Board oversight

The Public Responsibility Committee of our board of directors is made up of outside directors and oversees all company political activity, including political expenditures, corporate political contributions, major trade association memberships and more. This board would also approve independent political expenditures if General Mills made any, though we have never done so.

- a. **Political Contributions.** Use of Company funds for political contributions anywhere in the world requires approval in writing from the appropriate operating executive, the General Counsel and the Vice President, Government Relations. Additionally, all direct contributions to independent political expenditure campaigns must be approved by the Company's Public Responsibility Committee. Company political contributions will be aligned with the interests of the company. Proper recipients of company political contributions include candidates for political office in the United States or organizations that support candidates for political office in the United States. Contributions will be made without regard for the private political preferences of company officers or executives.
- b. **Political Activities.** The Company encourages employees to be active participants in public affairs during non-work time, and to support the party and candidates of their choice, provided that the laws on corporate contributions are followed and the activities do not interfere with the employee's ability to perform his or her Company responsibilities.
- c. **Political Action Committee.** The Company has established, in compliance with U.S. law, the General Mills Political Action Committee (G-PAC), which uses employee contributions to make political contributions to U.S. federal and state political parties, committees and candidates. Participation in the G-PAC by employees is strictly voluntary. The Company pays the costs of administering the G-PAC.
- d. Managers or supervisors must obtain formal approval from the General Counsel and the Vice President, Government Relations if there is any question as to the propriety or legality of an employee's political contributions or actions.
- e. The Company's Public Responsibility Committee reviews a report of political contributions made with Company funds on an annual basis. The Public Responsibility Committee also periodically reviews the Company's policy on political contributions.