

**MOLSON COORS BEVERAGE COMPANY**  
**Political Contributions Policy (the “Policy”)**

Molson Coors Beverage Company (“Molson Coors”) actively participates and engages in the political process. Political participation takes many forms, including lobbying, making political contributions, and participating in trade associations. In conducting these activities, Molson Coors conducts its business ethically and in compliance with the law. Management regularly consults with outside counsel to ensure political activities undertaken are reported as required by law to applicable federal, state and local authorities. In addition, senior employees are required to take annual training courses on its code of conduct.

Molson Coors is subject to extensive regulation internationally and at the federal, state, and local levels of government in the U.S. which have a significant impact on our business. Therefore, engagement in the legislative and regulatory process is necessary to our success and is in the best interest of stockholders.

Our Chief Legal & Government Affairs Officer and Vice President - Government Affairs, in consultation with outside counsel, oversee all political activity. This includes any use of funds to further our public policy and political interests.

**Political Contributions**

The Governance Committee of the Board of Directors oversees the company's corporate and PAC political contributions and receives annual reports that review political giving. Management of our participation in such activities is the responsibility of the Chief Legal & Government Affairs Officer and Vice President - Government Affairs. Molson Coors’ political spending is aligned to a set of giving criteria that is focused on a pro-Molson Coors agenda which generally, but not exclusively, opposes increased beer taxes, restrictions on sales & marketing, and promotes marketplace transparency and industry innovation. Molson Coors political spending is not influenced by the political preferences of any individual director, officer, or employee.

***Molson Coors Beverage Company Political Action Committee (“Molson Coors PAC”)***

Pursuant to federal election law, Molson Coors does not make political contributions to candidates for a federal office or to third party federal political committees, such as political parties or political action committees whose purpose is to help elect federal candidates. However, we provide an opportunity for eligible employees to participate in the political process by joining our non-partisan political action committee, Molson Coors PAC. Employee participation in Molson Coors PAC is completely voluntary.

Molson Coors PAC makes contributions to federal candidates and committees which are funded solely by the voluntary contributions from PAC eligible employees. Molson Coors does not favor or disadvantage any employee by reason of the amount of their contribution or the decision not to contribute to Molson Coors PAC. Coercive Molson Coors PAC solicitations are strictly prohibited. Molson Coors PAC offers employees an opportunity to speak with a unified voice on issues important to our company, such as those discussed above.

Molson Coors PAC has its own board of directors, which approves all PAC contributions. The Molson Coors PAC board of directors has established in its operating guidelines the following criteria to support candidates: their position on Molson Coors’ priority issues, leadership position, committee assignments, representation of Molson Coors operations/people and likelihood of election success. These criteria are

available to all Molson Coors employees and feedback/questions from Molson Coors employees on specific contributions is welcomed.

Candidates for federal office take positions on a wide range of issues and Molson Coors PAC contributions are not an endorsement of a candidate's comprehensive political views. Molson Coors PAC does not make contributions to presidential, state, or local candidates and does not make independent expenditures in support of or opposition to a candidate.

Molson Coors PAC is registered with the Federal Election Commission ("FEC") and files monthly reports with the FEC, or as otherwise prescribed by federal law. These reports are publicly available and provide an itemization of the Molson Coors PAC receipts and disbursements, including its contributions to candidates, party committees and any other organizations.

Year to date and historic Molson Coors PAC contribution information may be found on the FEC website at: <https://www.fec.gov/data/committee/C00457697>.

Further information on the contributions of the Molson Coors PAC can be found in Molson Coors' Annual Political Activity Report.

### ***State/Local Political Contributions***

Individual state and local laws govern contributions to candidates running for election to state and local offices. The guidelines for determining whether a corporate political contribution should be made to a candidate are the same as the PAC contribution criteria above (their position on Molson Coors' priority issues, leadership position, committee assignments, representation of Molson Coors operations/people and likelihood of election success) and giving is focused on states with Molson Coors breweries or other operations. The Vice President - Government Affairs, in consultation with outside counsel, approves requests for state and local corporate contributions.

Molson Coors files reports reflecting corporate political contributions to state or local candidates, parties and committees as required by relevant state and local laws. Molson Coors' contributions to state and local candidates can be found in the Molson Coors' Annual Political Activity Report.

Finally, to the extent allowed by state and local laws, Molson Coors may establish or sponsor local entities that operate in a similar manner to Federal PACs. These entities focus on the same issues and utilize the same giving criteria as noted above. For further information on such entities refer to Molson Coors' Annual Political Activity Report.

### ***Other Politically Related Activities***

Molson Coors periodically contributes to ballot initiatives, get-out-the-vote activities, and partisan organizations, such as the Democratic and Republican attorneys general associations. Molson Coors also may participate in state or federal political party conventions, as well as inaugural events as permitted by federal or state laws. The objective of any of these engagements remains the same: ensuring that Molson Coors' voice is heard on issues that impact the success of Molson Coors business operations. Any such contribution requires the review and approval of the Chief Legal & Government Affairs Officer and Vice President - Government Affairs, in consultation with counsel, and contributions are publicly disclosed as required by applicable federal, state or local law.

## **Advocacy**

Consistent with our philosophy that drives our political contributions, Molson Coors is committed to being a positive voice on public policy issues that not only impact the beverage industry but also impact our customers, our people and the communities we serve. Molson Coors cares about a wide range of issues including, but not limited to, fair trade, transportation, safety & security, workforce development, sustainability, competition, and energy.

Management of our advocacy activities contained in this section is the responsibility of the Chief Legal & Government Affairs Officer and Vice President - Government Affairs. Molson Coors' Leadership Team and Board regularly receive updates on advocacy activity and priorities.

## ***Lobbying***

Federal, state and local statutes govern the definitions of lobbying activities, corporate engagement in such activities and reporting requirements. Molson Coors complies with all applicable federal, state and local statutes.

On a quarterly basis, Molson Coors submits reports, pursuant to the requirements of the Lobbying Disclosure Act, reporting on federal lobbying activities and expenses as well as semi-annual reports on federal contributions. The reports may be found on the House and Senate websites, under the Public Disclosure links. Molson Coors also files reports with state and local agencies reflecting lobbying activities as required by relevant state and local laws.

Employees engaged in lobbying activity receive regular training on lobbying and ethics regulations.

## ***Trade Associations***

Molson Coors participates in trade and industry associations that may support our public advocacy efforts. Examples at a global level are the International Alliance for Responsible Drinking (IARD) and the Worldwide Brewers Association (WBA); at a national level these include the Beer Institute and Beer Canada; and, at a state/local level, Molson Coors is a member of various chambers of commerce or other organizations which may participate in public advocacy matters that assist in advancing a pro-Molson Coors agenda. As a leader in the beverage industry, participation in these organizations allows us to share our business expertise and to be part of public education efforts regarding issues facing our industry and the business community.

Trade association membership is subject to senior management approval and oversight and comes with the understanding that trade associations are consensus-driven organizations and, typically, no one member may dictate the priorities of the organization over the concerns/objections of other members. Molson Coors may not always agree with all positions of the organizations or with the individual positions of other members, but Molson Coors believes that our participation in these organizations makes us more effective and broadens our perspective on policy issues critical to our industry, our company, our customers, and our communities.

## **Employee Political Engagement**

Molson Coors encourages its employees to participate in political activities in their personal capacity, including voting in elections, volunteering for campaigns, and making contributions to candidates, parties, committees, ballot measures, and political organizations, irrespective of whether such people or organizations hold views that are consistent with the interests of Molson Coors. Consistent with this

approach, Molson Coors Leadership decided to designate U.S. Election Day as a company holiday so that every U.S. employee would have an opportunity to vote. Employees with questions about specific political activities are encouraged to contact the Chief Legal & Government Affairs Officer and the Vice President – Government Affairs.

### **Political Activity Report**

Refer to Molson Coors' Annual Political Activity Report for further information regarding Molson Coors' political activity, including federal and provincial political contributions in Canada.

Last Modified and Effective Date: February 16, 2021

**MOLSON COORS BEVERAGE COMPANY**  
**2020 Political Activity Report**

Pursuant to the Political Contributions Policy (the “Policy”) adopted by the Governance Committee of the Board of Directors of Molson Coors Beverage Company (“Molson Coors”), below is the summary of political activity for Molson Coors in 2020.

Molson Coors actively participates and engages in the political process. In conducting these activities, MCBC Molson Coors conducts its business ethically and in compliance with the law as further detailed in the Policy, the most recent version of which is available at <https://www.molsoncoors.com/about/governance-and-ethics>.

**Molson Coors Beverage Company Political Action Committee (“Molson Coors PAC”) – United States**

In 2020, the Molson Coors PAC contributed \$63,500 to candidates for Federal office and other Federal political committees. Of these funds, \$21,500 went to Democrat candidates and \$42,000 went to Republican candidates.

Consistent with the Policy, no contributions were made to candidates for President of the United States, candidates for state or local office, or as independent expenditures in support or opposition to a candidate.

Full details of all Molson Coors PAC activities can be found at the Federal Election Commission’s website at <https://www.fec.gov/data/committee/C00457697>.

**State and Local Political Contributions – United States**

In 2020, Molson Coors made a total of \$285,496 in contributions to state and local candidates in the following states:

<b><u>State</u></b>	<b><u>Contributions</u></b>	<b><u>Link</u></b>
Alaska	\$4,600	<a href="#">Alaska Public Offices Commission</a>
California	\$79,900	<a href="#">California Secretary of State</a>
Colorado	\$16,246	<a href="#">Colorado Secretary of State</a>
Florida	\$8,000	<a href="#">Florida Department of State, Division of Elections</a>
Georgia	\$7,500	<a href="#">Georgia Campaign Finance Commission</a>
Illinois	\$79,000	<a href="#">Illinois State Board of Elections</a>
Indiana	\$10,000	<a href="#">Indiana Secretary of State, Election Division</a>
Louisiana	\$500	<a href="#">Louisiana Ethics Administration Program</a>
Maryland	\$500	<a href="#">Maryland State Board of Elections</a>
Montana	\$2,500	<a href="#">Montana Commissioner of Political Practices</a>
Nevada	\$2,500	<a href="#">Nevada Secretary of State</a>
New Hampshire	\$4,500	<a href="#">New Hampshire Secretary of State</a>
New York	\$11,500	<a href="#">New York State Board of Elections</a>
Oregon	\$5,000	<a href="#">Oregon Secretary of State</a>
Virginia	\$11,250	<a href="#">Virginia Department of Elections</a>
Wisconsin	\$42,000	<a href="#">Wisconsin Ethics Commission</a>

### **Molson Coors Conduit Committee – United States**

Consistent with the laws of the State of Wisconsin, Molson Coors maintains a Conduit Committee for the purposes of accepting voluntary contributions from Molson Coors employees and directing those funds to specific candidates for Wisconsin elected office.

In 2020, the Molson Coors Conduit directed contributions (with the approval of the individual contributor) in the aggregate amount of \$9,750 to candidates for Wisconsin elected office. Of these funds, \$2,750 went to Democrat candidates and \$7,000 went to Republican candidates.

Full details of all activities by the Molson Coors Conduit can be found at the Wisconsin Campaign Finance Information System website at <https://cfis.wi.gov>.

### **Federal & Provincial Political Contributions – Canada**

Molson Coors is prohibited from making direct contributions to Federal candidates and did not make any contributions to third parties or register as a third party in 2020.

Molson Coors made a political contribution in Newfoundland & Labrador of \$2,000. Molson Coors did not make any contributions in Saskatchewan and contributions by corporations are prohibited in Ontario, Quebec, British Columbia, Alberta, Manitoba, New Brunswick, Nova Scotia, or Prince Edward Island.

### **Other Political Activity**

In 2020, Molson Coors did not engage in any ballot initiatives or support any partisan get-out-the-vote activities.