

PEABODY ENERGY POLICY

Related Person Transactions

No. 500.18

September 2012

The Company recognizes that certain transactions with its directors, executive officers, significant stockholders and other related persons should be evaluated in order to determine whether they are consistent with the best interests of the Company and its stockholders.

The Policy and Procedures with Respect to Related Person Transactions adopted by the Company's Board of Directors on January 23, 2007, is contained in Appendix A hereto.

REFERRALS:

Policy and Procedures with Respect to Related Person Transactions

Appendix A