

**PEABODY POLICY**

**Political Contributions and Peabody Political Action Committee**

**P 700.02**

**March 2018**

**Executive Owner: Executive Vice President Chief Legal Officer, Government Affairs and Corporate Secretary**

The Company is committed to participating in the democratic process to the extent allowed by applicable laws.

The Company may contribute to election campaigns only in accordance with the applicable laws governing such activity. Individual employees may make personal political contributions but will not be reimbursed for those contributions. Employees may not use Peabody resources in support of their personal political activities. The Company also encourages all employees to adhere to the laws and all regulations regarding political activities when acting on a personal basis.

**Peabody PAC**

Campaign contributions to candidates for U.S. federal office shall be made by the Peabody Political Action Committee ("Peabody PAC") or through personal donations from individual employees. Corporate contributions to candidates for U.S. state office may be made only in those states that permit such contributions.

Peabody PAC shall operate within the strict requirements of U.S. federal election campaign laws and its own by-laws and shall make periodic reports to the Federal Election Commission. The Chairman and Chief Executive Officer of Peabody shall appoint the PAC Chair who, in turn, shall appoint the PAC board. The PAC board oversees the PAC's contributions to candidates. The Peabody PAC will be subject to annual audits by the Company's Internal Audit process.