

**Eastman Kodak Company**  
**Corporate Political Contributions and Expenditures Policy**

Eastman Kodak Company is committed to being a responsible corporate citizen and to promoting disclosure and accountability regarding political contributions and expenditures. It is the policy of Kodak to advance the Company's business and public policy interests through legally permissible participation in the political process where appropriate. The Company maintains a nonpartisan political position, meaning that it takes positions on issues and may, therefore, support candidates, regardless of party affiliation, whose philosophies or positions on issues are consistent with the Company's business goals and objectives. Any and all political expenditures reflect the interests of the Company as a whole, not those of its individual officers, directors or employees.

**Oversight by Management and the Board**

The Company's Office of Public Affairs directs all political activity of the Company. On an annual basis, the Company's Chief Executive Officer reviews and approves the annual budget for political expenditures of the Company and meets with the Vice President, Public Affairs, to determine priorities for political spending. In addition, the annual budget is reviewed and approved by the Director, Corporate Communications and Public Affairs, and by the Chief Marketing Officer. All corporate expenditures that are used for political purposes must be approved by the Vice President, Public Affairs. Expenditures will be allowed only after review of all necessary criteria relating to the spending decision, which may include public integrity of a candidate or organization, representation of a jurisdiction that is important to the Company's strategies, and any effect that the expenditure may have on Kodak's reputation, brand or position in the community.

The Board of Directors of Eastman Kodak Company, through its Corporate Responsibility and Governance Committee, oversees the Company's policy and expenditures surrounding political activity. On an annual basis, management provides a report to this Committee with regard to all political activity and expenditures of the Company. Currently, this Committee is comprised entirely of independent directors.

**Corporate Contributions and Related Political Activity**

Pursuant to federal law, Kodak is not permitted to and does not make corporate contributions, including in-kind contributions, to candidates for federal office or to national party committees. However, certain states permit contributions to candidates for state or local office and to organizations that engage in political activities. Where appropriate as a means to further the Company's interests, Kodak may contribute to state or local candidates for government office. The Company engages in a detailed review and approval process prior to making any such expenditure to ensure that the spending is in furtherance of the business interests of the Company. The only corporate contributions made at the state and local levels at this time are in New York State and can be found at [www.elections.state.ny.us](http://www.elections.state.ny.us).

### **Kodak's Political Action Committee (KodaPAC)**

Kodak sponsors a political action committee (Eastman Kodak Company Employee Political Action Committee, or "KodaPAC"), which is authorized to contribute to federal candidates, parties and committees, and to state candidates, parties and committees in certain states. All KodaPAC contributions are disclosed on the following websites: [www.fec.gov](http://www.fec.gov) and [www.elections.state.ny.us](http://www.elections.state.ny.us). Administrative expenses for KodaPAC are supported by the corporation as permitted by federal, state and local law.

The Board of Directors of KodaPAC is comprised of representatives from businesses and functions within the Company and oversees all activity and administration of the organization. The Board of Directors approves all contributions made by KodaPAC.

### **Lobbying Activities**

Given that it is important for Kodak to interact with legislators, regulators and other public policymaking bodies in order to further the interests of the Company, Kodak employs registered lobbyists and contributes to certain lobbying efforts. Kodak's lobbying activities and expenditures are disclosed on the following websites:

- (1) <http://disclosures.house.gov/ld/ldsearch.aspx>;
- (2) <http://soprweb.senate.gov/index.cfm?event=selectfields>.
- (3) [www.elections.state.ny.us](http://www.elections.state.ny.us)

### **Contributions to Trade Associations**

Kodak is a member of certain trade associations, social welfare organizations and other tax-exempt organizations as defined under Section 501(c)(6) of the Internal Revenue Code. On an annual basis, with respect to such organizations to which Kodak pays annual dues of at least \$50,000, and where Kodak's relationships with such organizations are overseen by the Office of Government Affairs, Kodak will inquire and make a reasonable effort to obtain from such organizations the portion of such dues that are used for lobbying or political activity. To the extent that the organizations provide this information, it will be disclosed on this website on an annual basis.

### **Contributions to 527 organizations**

Kodak does not contribute to any "527" organizations (defined as a party, committee or association that is organized for the purpose of influencing the election or appointment of a public or political office). Further, Kodak's policy is that the Company does not make or engage in independent political expenditure activity as defined under federal election law.

### **Personal Political Activities of Kodak Employees**

The Company encourages its employees to participate in the political process by becoming informed voters and by supporting the candidates and issues of their choice. However, all such activity is entirely personal, is not required of the employee, and may not in any way imply or represent the concurrence

or endorsement of Kodak. The Company does not reimburse contributions or expenditures made by employees.

**Kodak Business Conduct Guide**

All employees of Eastman Kodak Company are required to follow the terms of the Company's Business Conduct Guide, which promotes the highest ethical standards in conducting business. The Business Conduct Guide contains requirements concerning dealings with government employees and officials. The Business Conduct Guide is publically available at the following link:  
<http://policies.kodak.com/policies/BusinessConductGuide.htm>.