

## **The J. M. Smucker Company**

### **2017 Annual Report of Lobbying and Advocacy Expenditures**

**October 31, 2018**

This Annual Report of Lobbying and Advocacy Expenditures contains a summary of expenditures made by The J. M. Smucker Company (the “Company,” “we,” and “our”) during the 2017 calendar year on account of lobbying and advocacy initiatives that are important to the Company and our shareholders. We have disclosed these expenditures because we believe it is important that shareholders know how Company funds are used to lobby for and advocate issues important to the future growth and prosperity of the Company.

#### **Our Policy on Political Advocacy**

We have not historically contributed Company funds, directly or indirectly, to candidates for public office, political parties or committees, or entities organized under Sections 501(c)(4) or 527 of the U.S. Internal Revenue Code (the “Code”). To the extent that we contribute any Company funds to such individuals or entities in the future, we will disclose such contributions in subsequent annual reports of lobbying and advocacy expenditures. Company funds are used to support or advocate issues, legislation, or referenda of importance to the Company and our shareholders. These funds, classified under the Code as non-deductible lobbying expenditures, are paid primarily to industry trade associations, lobbying entities, and our internal government relations personnel. The Company’s Nominating, Governance, and Corporate Responsibility Committee will review any such contributions and payments on an annual basis to ensure alignment with this policy and the Company’s *Basic Beliefs*. During the 2018 calendar year, we organized a federal political action committee to accept contributions and make disbursements in support of political activities (referred to as the “Smucker PAC”). We will disclose any disbursements from the Smucker PAC during the 2018 calendar year in our 2018 Annual Report of Lobbying and Advocacy Expenditures.

#### **Non-Deductible Lobbying Expenditures Incurred by the Company in 2017**

Set forth below is a summary of the non-deductible lobbying expenditures incurred by the Company during the 2017 calendar year:

1. The Company did not contribute to (i) any candidate for public office, political party, or political committee, (ii) any state ballot initiative, or (iii) any Super PAC or other entity organized under Sections 501(c)(4) or 527 of the Code.
2. The Company is a member of several trade associations, each of which is required to provide a breakout of the portion of dues or payments made by the Company that are used for lobbying purposes and, therefore, are non-deductible for tax purposes. Listed below are the trade associations to which a portion of the Company’s payments for the 2017 calendar year allocated for lobbying expenses was \$25,000 or greater. If the amount of the Company’s payments to a trade association allocated for lobbying expenses for a calendar year exceeds \$500,000, the Company will disclose the dollar amount (as well as the percentage) of such payments allocated for lobbying expenses for such calendar year.
  - Grocery Manufacturers Association
    - Percentage of Membership Dues Allocated for Lobbying Expenses – 20.4%
3. The Company made the following non-deductible expenditures to contract lobbyists:
  - Calfee, Halter & Griswold LLP \$19,000
  - Hogan Lovells \$12,795
  - Niemela, Pappas & Associates \$79,611