



Starbucks Coffee Company Policy on Corporate Political Contributions and Expenditures 2011 Update

Starbucks Coffee Company ("Starbucks") is committed to being actively involved in the communities we serve. This commitment extends to our approach to public policy. We believe we have a responsibility to advocate policies that support the health of our business, our partners and communities we are part of.

In an effort to better communicate these activities, Starbucks adopted a policy to provide more transparency about our corporate political contributions and expenditures. We believe this policy will serve Starbucks interests in promoting public policies of concern to the company and educating elected and public officials about our business, while providing important information to our partners, customers, and shareholders.

Starbucks is committed to conducting business ethically, with integrity, and in accordance with the law. Part of that commitment includes compliance with rules, regulations, and standards governing our interaction with the government, including our disclosure and accountability regarding political contributions and expenditures.

This policy supports Starbucks interests in promoting public policies of concern to the company and educating elected and public officials about our business.

Corporate Contributions

To the extent legally permitted and deemed appropriate and authorized by the Senior Vice President of Public Affairs, Starbucks may consider corporate contributions to (a) candidates running for state or local office; (b) state or local political parties and committees; (c) entities operating under section 527 of the Internal Revenue Code and other tax-exempt organizations when such contributions are used for political purposes; and (d) support issue or ballot measure campaigns and committees. Such contributions may include, in accordance with applicable law, appearances by candidates at Starbucks facilities or events. The Company's Nominating and Corporate Governance Committee will review such corporate contributions and payments on an annual basis to ensure alignment with Starbucks policy and values.

Personal Partner (Employee) Contributions

Starbucks supports partners becoming personally involved in their community and in the political process but does not permit the use of corporate resources or Starbucks time for personal political matters. Starbucks will not reimburse partners for political contributions. In addition, giving money, gifts, products or services to government officials in exchange for official action is strictly prohibited.

Political Action Committee

Starbucks does not have a Political Action Committee (PAC). Should Starbucks decide to form a PAC, the Company will update this policy to reflect that decision.

Trade Associations

Starbucks may communicate our positions on public policies through industry associations to which we belong in our major markets and locations. These organizations give us a collective voice with our industry partners, enabling us to reach government officials more efficiently. We will list the major associations where Starbucks pays annual dues of \$50,000 or more per year on our website and update that information annually.

Disclosure

Starbucks annual voluntary disclosure will include the following information on the publicly available Starbucks website:

- a. A copy of Starbucks Policy on Corporate Political Contributions and Expenditures
- b. Information about our public policy agenda on our website at <http://www.starbucks.com/responsibility>
- c. Payments to trade associations where we are members at \$50,000 per year or more, and the portions of these payments that are used for lobbying purposes.
2011 update: Grocery Manufacturers Association
- d. Contributions to:
 - (a) candidates running for state or local office; 2011 update: zero
 - (b) state or local political parties and committees; 2011 update: zero
 - (c) entities operating under section 527 of the Internal Revenue Code and other tax-exempt organizations when such contributions are used for political purposes; and 2011 update: zero
 - (d) support issue or ballot measure campaigns and committees. 2011 update: zero