



Policy Statement on Political Engagement

AmerisourceBergen Corporation participates in the political process to advance the interests of the Company and our employees. We engage in the political process at the national and state levels by making political contributions to candidates for elective office, by presenting to legislators and other government officials our position on issues of interest to us and by working with industry and trade groups, without regard to the private preferences of our executives.

In these efforts, we focus on healthcare policy and other issues that directly affect our business and the businesses of our customers, including pharmaceutical manufacturers, acute care hospitals and health systems, independent and chain retail pharmacies, mail order pharmacies, long-term care pharmacies and physicians and physician group practices. Policy issues of particular importance to our business include enactment of laws and regulations intended to protect the safety of the pharmaceutical supply chain and certain improvements to the Patient Protection and Affordable Care Act.

We are committed to participating responsibly and ethically in the political process. This commitment is reflected in the AmerisourceBergen Corporation Code of Ethics and Business Conduct, which specifically addresses the ethical and honest conduct that we require of our directors, officers and employees in their interactions with government officials.

To increase transparency about our engagement in the political process, we are posting this policy statement on our website at www.amerisourcebergen.com. In addition, to improve access to information about our expenditures for political contributions and lobbying activities, we will disclose annually on our website the aggregate amount of these expenditures for the prior year.

AmerisourceBergen Board Oversight

The Governance and Nominating Committee of AmerisourceBergen's Board of Directors has oversight of all the Company's political contributions and lobbying activities. We review our political contributions and those of the AmerisourceBergen Corporation Political Action Committee, or ABC PAC, annually with the Governance and Nominating Committee. We also review our Policy Statement on Political Engagement with the Governance and Nominating Committee.

Political Contributions

Federal law prohibits corporations from contributing corporate funds directly to federal candidates or party committees. A corporation may, however, sponsor a political action committee that contributes to federal and state candidates from funds voluntarily received from employees. In some states, contributions from corporate funds to state and local candidates are permissible, subject to certain limitations.

ABC PAC Contributions

Eligible AmerisourceBergen employees may contribute voluntarily to the ABC PAC. The ABC PAC makes contributions to federal, state and local candidates, leadership PACs, party committees and some industry association PACs. The ABC PAC makes contributions to candidates with leadership positions in Congress and, where permitted, state legislatures,

including candidates who are likely to serve on committees with jurisdiction and oversight over key issues affecting our business. Contributions are made to candidates of both major political parties based on their individual positions on business and policy issues that affect AmerisourceBergen, our employees and our customers. The ABC PAC also supports candidates in states or districts where our facilities and employees are located. The ABC PAC does not participate in presidential primary or general election contests.

The ABC PAC is governed by its own Board of Directors. The ABC PAC Board of Directors meets at least twice a year to make decisions about where to allocate ABC PAC political contributions. The ABC PAC Board of Directors oversees the contribution strategy and approves ABC PAC's political contributions. ABC PAC provides an annual report to the Governance and Nominating Committee of the AmerisourceBergen Board of Directors detailing its contributions over the prior year.

The ABC PAC Board of Directors is composed of the following AmerisourceBergen executives:

John Chou, Executive Vice President and General Counsel
James Cleary Jr., Executive Vice President and President, MWI Animal Health
James Frary, Executive Vice President and President, AmerisourceBergen Specialty Group
Kathy Gaddes, Executive Vice President and Chief Human Resources Officer
Peyton Howell, Executive Vice President and President, Global Sourcing and Manufacturer Relations
Robert Mauch, Executive Vice President and President, AmerisourceBergen Drug Corporation
Rita Norton, Senior Vice President, Government and Public Policy
J.F. Quinn, Vice President and Corporate Treasurer

In 2016, ABC PAC contributions to federal and state candidates totaled approximately \$597,000 in the aggregate. We are required by federal law to file regular reports disclosing all political contributions made by the ABC PAC. You can access our reports and all information on ABC PAC contributions on the Federal Election Commission website at www.fec.gov.

AmerisourceBergen Corporation Political Contributions

Where permitted by law in selected states, the Company makes political contributions from corporate funds, primarily to the electoral campaigns of individual state or local candidates. The amount of these contributions is limited by state law. In 2016, the amount of political contributions to state candidates that the Company made from corporate funds was \$38,900 in the aggregate. In 2016, these contributions were directed to candidates in state and local elections in California and Washington.

In 2016, we did not make any contributions to fund independent expenditures, including to "super PACs" or other tax exempt groups that advocate for the election or defeat of a federal or state candidate.

In limited instances, corporations are permitted to support voter referendums and certain national political groups. Although ABC has not historically made such contributions, in 2016 we contributed \$65,000 to Defeat the Tax on Oregon Sales, a coalition opposed to a ballot initiative proposing a tax on businesses with annual sales in excess of \$25 million. In the event that we make corporate contributions to any voter referendums or other ballot initiatives in the future, we will disclose those contributions in our policy statement.

In 2016, AmerisourceBergen made corporate contributions of \$67,850 in the aggregate to the following national party associations:

| <u>National Party Association</u> | <u>2016 Contribution</u> |
|---|--------------------------|
| Democratic Governors Association | \$10,350* |
| Republican Governors Association | \$50,000 |
| National Conference of State Legislatures | \$7,500 |

* 2017 donation of \$50,000 to be paid in February 2017

We comply with all applicable laws with respect to any such corporate political contributions, including limitations on amounts and reporting and disclosure requirements. Our Senior Vice President of Government and Public Policy, in consultation with the Company's policy committee, makes decisions regarding the Company's corporate political contributions to state candidates. A report on the Company's corporate political contributions will be made annually to the Governance and Nominating Committee of the Board of Directors.

Lobbying Activities

AmerisourceBergen engages in lobbying activity to support our position on public policy issues. In addition to advocacy efforts by our employees, we have also engaged external lobbyists in Washington, D.C. and certain other jurisdictions to track emerging legislative and regulatory developments and to assist us in educating legislators and regulators about issues affecting our business, employees and customers. Through lobbyists, we also advocate for health care reform consistent with our goal of efficiently and effectively supplying high-quality, low-cost pharmaceutical products, as well as advanced therapies, to as many healthcare providers and, ultimately, patients as possible.

In 2016, AmerisourceBergen spent approximately \$1,590,000, in the aggregate, on federal lobbying expenses and approximately \$459,273 in state lobbying expenses. These expenses include the salaries and expenses of our employees who engage in lobbying activities as well as third party costs, such as amounts paid to consultants who engage in lobbying activity on our behalf.

We report annually to the Governance and Nominating Committee of the AmerisourceBergen Board of Directors on the costs associated with lobbying activities over the previous year. We also comply with the reporting requirements of the Lobbying Disclosure Act of 1995, which requires disclosure of certain Congressional lobbying expenses and activities, including the issues with respect to which we have engaged in lobbying activities. We file reports disclosing our federal lobbying-related expenses on a quarterly basis. We encourage you to review our filings on federal lobbying activities with the Clerk of the House of Representatives and the Secretary of the Senate, which are available at

<http://soprweb.senate.gov/index.cfm?event=selectfields> and <http://disclosures.house.gov/ld/ldsearch.aspx>.

AmerisourceBergen is a member of several industry and trade groups. We work with these groups to address issues affecting our industry and to educate government officials and other stakeholders about the effects of proposed legislation or regulation on our business and industry. Certain dues paid to these organizations may be used to support lobbying activities.

Listed below are the industry trade associations to which we have paid dues in an amount over \$50,000 in 2016. Trade associations are required to report to us what portion of our annual dues are not deductible under federal tax laws because they were used for lobbying activities or to influence legislation. We also provide that information below.

| <u>Trade Association</u> | <u>2016 Dues</u> | <u>Portion of Dues Allocated to Non-Deductible Lobbying Expense</u> |
|--|------------------|---|
| Healthcare Distribution Management Association | \$1,300,000 | \$234,000 |
| Healthcare Leadership Council | \$200,000 | \$90,000 |
| National Association of Chain Drug Stores | \$300,000 | \$132,000 |
| National Association of Wholesalers-Distributors | \$107,893 | \$21,579 |
| National Community Pharmacists Association | \$250,000 | \$62,500 |

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