

J. C. PENNEY COMPANY, INC.

Communications with the Board of Directors

Any Company stockholder or other interested party who wishes to communicate with the Board of Directors or with an individual director may do so using one of the following methods:

- Telephone: 1-800-527-0063
- Email: jcpdirectors@jcpenny.com
- Mail: Corporate Secretary
J. C. Penney Company, Inc.
P. O. Box 10001
Dallas, TX 75301
- Fax: 972-431-1977

The communication should be clearly addressed to the Company's Board of Directors or to a specific director(s). If a response is desired, please also provide contact information such as name, address and telephone number.

All such communications will be reviewed initially by the Corporate Secretary and entered into a log for tracking purposes. The Board has asked the Corporate Secretary to forward to the appropriate director(s) all correspondence, except for items unrelated to the Board's functions, business solicitations, advertisements, and materials that are profane. The Corporate Secretary prepares a periodic summary report of all such communications for the Corporate Governance Committee of the Board.