



Version 2.0 | Effective February 2025

Kohl's Corporation, together with its subsidiaries ("Kohl's" or the "Company") engages with the communities in which we do business and encourages its associates to participate in civic and community activities, including participation in the democratic process.

This Political Activity Policy (this "Policy") sets forth key principles and policies concerning political contributions, trade associations, and political and civic activities by and on behalf of Kohl's, and it applies to Kohl's and the Company's associates. All political and civic activity by the Company and its associates must comply with applicable law, Kohl's Code of Ethics, and this Policy.

Key Policies and Practices

As a matter of policy and practice, Kohl's:

- does not make corporate contributions or expenditures (either directly or through associate reimbursements) to support or oppose political candidates, their election campaigns, or political parties;
- does not support social welfare organizations created under Section 501(c)(4) of the Internal Revenue Code, which may use funds for political purposes;
- does not support entities organized under Section 527 of the Internal Revenue Code, which may influence referendums or the selection, nomination, election, appointment, or defeat of candidates with respect to federal, state, or local public offices; and
- does not have a company-sponsored Political Action Committee (PAC).

Corporate Political Contributions

Kohl's does not make contributions using company resources (including monetary and in-kind resources) to candidates, political parties, ballot initiatives, referendum campaigns, electioneering communications, or non-candidate organizations (such as political convention host committees), even where permitted by law. Additionally, Kohl's does not make contributions to entities organized under Section 527 of the Internal Revenue Code or social welfare organizations created under Section 501(c)(4) of the Internal Revenue Code.

As set forth in the Company's Code of Ethics, any departure from this policy would require prior written approval from Kohl's Chief Legal Officer and must conform to all applicable laws. In this event, Kohl's would disclose any such contributions and make all legally required filings, including with the Federal Elections Commission.

Kohl's Corporation | Political Activity Policy | Version 2.0

Trade Associations

Kohl's is a member of select trade associations and industry groups organized under Section 501(c)(6) of the Internal Revenue Code. The purpose of Kohl's membership with these groups is to advance the common interests and goals of the retail industry through advocacy and to maintain awareness on retail trends.

Kohl's may pay membership fees and make other contributions (e.g., for conferences or trainings), including on behalf of its associates, to certain trade associations or industry groups. Kohl's will pay membership fees only to trade associations that management has determined are meaningful to Kohl's business and its associates' professional development. Kohl's does not make additional contributions to these organizations to support the organization's political activities.

We monitor the activities of these organizations to ensure ongoing alignment with Kohl's objectives and perspectives. Kohl's participation in such organizations does not mean the Company endorses the organization's entire agenda or the views of its leaders or other members.

We will publicly disclose and update annually on corporate.kohls.com a list of trade associations to which Kohl's paid membership dues (representing the non-deductible portion of such dues) in excess of \$25,000 per annum.

Associate Political and Civic Activity

Kohl's associates are permitted to participate in political and civic activities, provided such activities are on their own time and at their own expense and do not otherwise interfere with the conduct of Kohl's business.

Associates may make personal political contributions with their own personal funds. Kohl's associates will not be reimbursed, directly or indirectly, by the Company for personal political contributions. Associates should always make it clear that their political activities and contributions are in their personal capacity and not attributed to or made on behalf of Kohl's.

Compliance and Oversight

Kohl's Chief Legal Officer and Chief Risk & Compliance Officer have oversight over political, trade association, and civic advocacy activities and communications. Annually, the Nominating and ESG Committee of Kohl's Board of Directors, which is comprised solely of independent directors, reviews the Company's political and civic advocacy activities, including payments made with respect to these activities, and monitors the Company's compliance with this Policy.

This Policy is consistent with Kohl's Code of Ethics, which expressly prohibits Kohl's associates from using company resources to make political contributions. The Company's Code of Ethics is reviewed and approved by the Board of Directors on an annual basis.

Kohl's Corporation | Political Activity Policy | Version 2.0



Fiscal 2024 Political Activity Report

Presented to the Board of Directors | February 18, 2025

Trade Associations

Consistent with the Company's Political Activity Policy, in fiscal 2024, Kohl's did not make any contributions:

Corporate Political Contributions

- using company resources (including monetary and in-kind resources) for political purposes, including to candidates, political parties, ballot initiatives, referendum campaigns, electioneering communications, or noncandidate organizations (such as political convention host committees);
- to entities organized under Section 527 of the Internal Revenue Code; or
- to social welfare organizations created under Section 501(c)(4) of the Internal Revenue Code.

In fiscal 2024, Kohl's paid membership dues (representing the non-deductible portion of such dues) in excess of \$25,000 to the following trade associations:

- National Retail Federation (NRF); and
- Retail Industry Leaders Association (RILA).

For more information about Kohl's policies and practices regarding political and civil advocacy, please refer to the Company's Political Activity Policy, Code of Ethics, and Kohl's Cares Report, available at corporate.kohls.com.







