

Political Activities and Contributions Policy

This policy sets forth the restrictions and disclosure requirements relating to political activities and contributions by Essendant Inc. and any of its direct or indirect subsidiaries and divisions (collectively referred to as “Essendant” in this policy).

It is the policy of Essendant that:

1. Essendant will not use corporate funds or other resources to:
 - a. Support or oppose individual campaigns for political office;
 - b. Contribute, either directly or indirectly, to political parties or campaign committees;
 - c. Contribute to 501(c)(4) and 527 tax-exempt groups in the United States engaged in political activity, unless approved in advance by the Board of Directors of Essendant; or
 - d. Fund independent expenditures, including advertisements, which support or oppose individual candidates.
2. On ballot measures deemed important to Essendant’s interests, Essendant is committed to publicly disclosing any payments made directly to influence the outcome, including recipient names and amounts.
3. Essendant’s political contributions and other political activities will be disclosed on Essendant’s website and to its Board of Directors in an annual political contributions report.
4. Corporate contributions or dues in excess of \$25,000 to trade associations and other organizations that use contributions for lobbying purposes may only be made according to the following guidelines:
 - a. Contributions shall be made in accordance with all applicable laws and regulations.
 - b. No corporate contributions shall be made without approval by the Chief Executive Officer of Essendant.
 - c. Recommendations for corporate contributions shall be provided to the Chief Executive Officer after review by the General Counsel of Essendant.

Policy Enforcement

Each Essendant officer, director and employee has the individual responsibility to ensure that he or she complies with this policy. The General Counsel shall have responsibility to oversee compliance.

Policy Violation

Violation of this policy and any related procedures may result in discipline, up to and including termination of employment.

Related Policies

- Code of Business Conduct