

Political Action Committee Policy

Green Plains Inc. formed the Green Plains Inc. PAC (the “PAC”) in 2019 as a voluntary, tax-exempt, unincorporated political committee organized pursuant to 2 U.S.C. § 431, *et. seq.* and 26 U.S.C. § 527. The PAC is independent of any political party, candidate, political cause or organization except that Green Plains Inc. defrays all of the costs and expenses incurred in the establishment and administration, as permitted by law, including the solicitation of contributions to the PAC.

1. Purpose

Establish the general guidelines for the PAC, so it is able to promote the American political process. To achieve this purpose, the PAC is empowered to solicit and accept voluntary contributions from certain individuals and to expend such contributions to influence the selection, nomination, election or appointment of individuals to public office (Federal, State or local). In carrying this out, the PAC is empowered to do all actions permitted by law, to contribute to candidates for public office and to committees of national political parties and congressional campaign committees.

2. Scope

This policy applies to all employees of Green Plains, shareholders and all people, regardless of their position or level, who collaborate with the PAC, including Senior Executives, VPs, Directors, Managers and, in general, any temporary or permanent employee (as jointly identified as "employee" or "employees"), as well as individuals.

3. Responsibilities

PAC Contribution Committee: Promote this policy, fostering leadership and providing direction to senior executives and the board of directors, as well as promoting the implementation of internal control mechanisms (due diligence) to ensure compliance. Review and approve all contributions from the PAC. Members are to be the CEO, CFO, Chief Legal and Administrative Officer, SVP Operations and VP Government Affairs.

Human Resources Department: Define, update and communicate which employees that are eligible by law to contribute to the PAC. Provide information to new hires on the PAC, and coordinate voluntary payroll withholding.

Legal Department: Ensure compliance with all laws as they relate to solicitation of funds from eligible employees and shareholders, as well as disbursement of funds to qualifying candidates, candidate committees, PACs, etc. Ensure timely and accurate compliance filings with the Federal Election Commission, the House and the Senate.

Eligible Employees and Shareholders: Comply with the provisions of this policy, and contribute within the limits of federal law. Report any illegal solicitation to H.R. and Legal Departments.

4. General Guidelines

Green Plains will ensure that:

- Only eligible employees and shareholders are solicited for donations to the PAC
- All donations are within annual federally-prescribed limits
- All donations over \$100 in a calendar year are publicly disclosed quarterly, semi-annually, and pre and post-election as prescribed by the FEC
- All contributions are within annual federally-prescribed limits
- All contributions are publicly disclosed quarterly, semi-annually, and pre and post-election as prescribed by the FEC
- All contributions are approved by a simple majority of the contribution committee, which is comprised of the CEO, CFO, Chief Legal and Administrative Officer, SVP Operations and VP Government Affairs

5. Reference

- 2 U.S.C. § 431, *et. seq.*
- 26 U.S.C. § 527
- <https://www.fec.gov/help-candidates-and-committees/candidate-taking-receipts/contribution-limits/>

6. Responsibility/Ownership

The Green Plains Government Relations and Legal departments are the assigned owners of this document and responsible for its content, updates and submission of approval to Senior Management. The VP of Government Affairs will have lead responsibility for all PAC filings and other compliance matters.

7. Updates

Changes implemented in between versions are described below:

VERSION	CREATED BY	DATE	COMMENTS
1.0	GR/Legal	03/10/2021	