

CASEY'S GENERAL STORES, INC.
POLICY AND GUIDELINES FOR CORPORATE CONTRIBUTIONS

STATEMENT OF PURPOSE:

Casey's General Stores, Inc. is committed to a program of providing financial support to organizations that endeavor to improve our economic, educational, and social environment.

Philanthropic investments shall be made in an effective, professional manner in consideration of the overall interest of the Company, shareholders, employees and the general public. Primary emphasis will be in those communities where Casey's has company-owned stores.

This policy is applicable to all operations of the Company. It does not cover dues, memberships, or subscriptions.

A. GENERAL CRITERIA

All requests for contributions must be submitted to the Corporate contributions Committee at least three weeks in advance of the need for funding.

- 1) Community Need: The program/project should address itself to an important community need and propose adequate action.
- 2) Results/Fiscal Responsibility: The organization should be structured to achieve anticipated results and fiscal responsibility.
- 3) Duplication of Service: Programs/projects should not duplicate or overlap those already existing in the community or area.
- 4) Tax-exempt status: The organization must be able to supply evidence that it is tax exempt under Section 501 (c)(3) of the Internal Revenue Code.

- 5) Standards of Conduct: The organization should use ethical methods of publicity, promotion and solicitation of funds. Organizations which mail unordered tickets or conduct telephone solicitations fail to meet the Company's criteria for fund raising.

B. CATEGORIES OF SUPPORT

The following sections outline contribution categories generally regarded as being within the scope of this policy.

- 1) Health and Welfare: The Company will consider operating contributions to local community services and social improvement agencies in communities where company-owned stores are located.
 - a) Federated Drives. The Company will encourage, but not demand, that employees contributed to federated fund drives. The Company will contribute to individual agencies, rather than to federated fund drives.
 - b) National Health and Welfare Agencies. Grants to national health and welfare agencies/organizations are not usually considered for grant awards because:
 1. The money is spent outside the local community.
 2. High fund-raising costs are normally incurred by such groups.
 - c) Hospitals. Contributions to hospital's health care facilities may be considered after a review of the entire campaign, benefits of services, individuals served and other pertinent information.
 - d) Youth Agencies/Organizations. Casey's has traditionally supported services and activities for children who are under the age of 12 and/or are disabled. Some exceptions may be made to this tradition if circumstances warrant the exception.
- 2) Education. Casey's will consider contributions as an aid to education, with priority given to elementary/secondary and technical schools. Grants will not be considered that request funds to supplant, duplicate, or in any way cover costs that are normally the responsibility of other funding bodies.
 - a) Capital Contributions. Considerations will not generally be

given to requests for capital contributions for educational institutions.

- b) Operating Expenses. Consideration may be given to requests for operating expenses for educational institutions if such operating expenses are for programs that will directly impact the Company or its employees in a positive manner.
 - c) Public Educational Institutions. The Company will not normally contribute to building or general operating funds of public educational institutions supported by taxes. Gifts are restricted to scholarships, fellowships, research and other similar grants.
 - d) State Associations of Independent Colleges. Casey's will consider contributions to associations of private colleges in states where they make allocations to operating expenses based on need and services provided, and where the Company has a substantial concentration of Company facilities.
- 3) Civic: Casey's will consider contribution request for capital and operating expenses to public and civic organizations representing such as community improvement, environment and ecology, justice and law, housing and urban renewal whose problems and purposes meet the criteria of this policy.

Membership in civic organizations such as Chambers of Commerce, are considered on an individual basis for each city in which a Casey's store is located. Memberships in other civic groups such as Rotary, Kiwanis, etc., are not considered contributions and, therefore, are not covered under this policy. However, consideration of grants for special programs within those organizations may fall within this policy.

- 4) Culture and Arts: Consideration will generally not be given to requests for capital and operating expenses to local, cultural, and arts organizations. Requests for contributions from local libraries, public radio and television, will, however, be given consideration.

C. RESTRICTIONS:

- 1) General. No contribution will be considered which is not deductible for corporate income tax purposes. Furthermore, under this policy, grants are not to be made to political organizations or candidates, religious denominations, fraternal, labor or veteran organizations, or to any group or purpose prohibited by law.
- 2) Political Contributions. For purposes of this policy, political contributions disallowed include contributions in support of any party or candidate in any election, whether federal, state, or local. Advertising in political program booklets, use of company duplicating facilities, and similar donations in kind, are also considered political contributions and are, therefore, unauthorized.
- 3) Athletics. Consideration will not be given to requests for contributions to support adult athletic groups (i.e. bowling, softball, volleyball, baseball teams) or any contact sport, regardless of the participant's age.
- 4) Discrimination. No contributions will knowingly be considered in support of organizations or programs which discriminate as a matter of policy on the basis of race, religion, color, sex, age, or national origin.

D. Related Activities

- 1) Employee Volunteerism. Casey's employees are encouraged to become involved in the activities of worthy, nonprofit organizations.

However, all management personnel should bear in mind that accepting an assignment with an organization soliciting financial support often carries with it certain implications that some organizations will likely ask and may expect Casey's to make contributions by reason of our management's participation. Realizing this, possible later embarrassment can be avoided by limiting participation to those organizations which will be eligible for consideration of a contribution from Casey's.

- 2) Solicitation of Employee Gifts. Casey's Corporate Contributions Committee has authorized local, organized solicitation of employees by federated drives in the cities where company operations are

located. All other proposed employee solicitations at any location should first be submitted in complete detail to the committee for consideration and approval. Under no circumstances does the Contributions Committee endorse the use of pressure or unethical promotion in the conduct of employee solicitation.

- 3) Use of Casey's Letterhead. No Casey's employee is to use company letterhead for nonprofit solicitation purposes without prior approval of the Corporate Contributions Committee.
- 4) Testimonial Dinners/Luncheons. Generally, the purchase of testimonial dinner/luncheon tickets is not considered an effective way to provide philanthropic support. While dinner subscriptions are not covered in this policy, the Corporate Contributions Committee recommends that careful consideration be given to each invitation. Often, direct contributions to qualifying organizations are far more effective gifts and ultimately less expensive to the Company.
- 5) Goodwill Advertising. Like testimonial dinners, "goodwill advertising" (in yearbooks, event programs, etc.) is considered an ineffective investment of the Company's philanthropic funds. These expenditures should be coded as advertising and not included in the contribution budget. The corporate advertising manager is available for consultation on such advertising.

E. PROCEDURES

- 1) Qualifications for Support. In addition to meeting the criteria and guidelines set forth above, requests for financial support are to be evaluated using the following standards:
 - a) Written Requests. All requests must be in writing. No consideration will be given to any verbal solicitation, unless confirmed by a written request which identifies the organization as is necessary to make a fair evaluation.
 - b) Annual Review. All requests for philanthropic support be made for more than one year, except that the Company may elect to pay some pledges in installments over a period of years. All pledges must be authorized by the Corporate Contributions Committee.

2) Responsibilities.

a) Corporate Contribution Committee

The Company has established a Corporate Contributions Committee, whose chairperson and four additional members are appointed by the Chief Executive Officer. The committee is responsible for recommending policies and procedures governing all contributions.

It insures that approval contributions policies are followed within the company, reviews and approves/disapproves all contributions and pledge requests, develops and administers corporate contributions, and oversees and coordinates contribution activities corporate-wide.

3) Publicity.

Local and department managers are encouraged to communicate the philanthropic activities of the Company to employees and the general public. Since the recipient organization is the best vehicle for publicizing a grant made by Casey's, managers should work closely with such organizations to insure community awareness of our participation.

F. INTERPRETATION

Requests for interpretation and application of Casey's contribution policy guidelines and procedures should be addressed to the Corporate Contribution Committee.