FLOWERS FOODS, INC.
POLITICAL CONTRIBUTION AND ACTIVITY POLICY

Flowers Foods, Inc. and its subsidiaries (collectively, "Flowers" or the "Company") may seek to participate actively in discussion of and debate on public policy issues that affect the Company, its employees, and its business operations consistent with the policies outlined herein.

Corporate Political Contributions Guidelines and Oversight

Where permitted by law, Flowers, using Company funds, may make political contributions as part of its engagement in public policy matters. Any political contribution using Company funds must be made for the purpose of promoting the interests of the Company and without regard to any private political preferences of any individual employee or executive. Contributions of Company funds to an organization, political party or candidate must be made in accordance with all applicable laws.

To ensure compliance with federal and state campaign finance laws, no political contribution of any kind, either direct or indirect, will be made by the Company using Company funds or on its behalf without the express written authorization from the Company's Director of Governmental Affairs and Chief Legal Counsel. Unless otherwise stated herein, all contributions using Company funds should be reported to the Board of Directors or the Nominating/Corporate Governance Committee at least annually and, when required by federal or state law, disclosed to the appropriate federal or state campaign finance regulatory agency.

The Company's Board of Directors has ultimate oversight responsibility for the Company's use of Company funds in political activities. As part of such oversight responsibility, in addition to reviewing the political contributions using Company funds, at least annually, the Company's Board of Directors or the Nominating/Corporate Governance Committee should review this Political Contribution and Activity Policy.

Federal Contributions

The Company does not use Company funds to directly support the campaigns of federal political candidates. Federal law prohibits corporate political contributions to candidates in connection with federal elections. Such contributions include any direct or indirect payment, distribution, subscription, loan, advance, deposit, or gift of money, services or anything of value to any candidate, campaign committee, political committee, or political party in connection with any federal election. The Company does not make direct independent expenditures that advocate the election or defeat of federal, state, or local candidates.

Notwithstanding the foregoing, the Company may decide that funding an independent expenditure through a Section 527 or Section 501(c)(4) organization ("indirect independent expenditure") or supporting a 501(c)(3) public policy organization could advance the Company's position and educate members of the public and elected officials on issues that are of critical importance to the Company. Prior written approval for such expenditures must be obtained from the Company's Director of Governmental Affairs and Chief Legal Counsel. Requests for such expenditures will be considered on a case-by-case basis and will include a review of whether the contribution would be an appropriate means of advancing issues that are important to the Company's business, shareholders, employees and other stakeholders and whether it is an appropriate means of advancing the Company's public policy position. The Company will disclose the amount and recipient of any indirect independent expenditure when required by federal and state law.

State and Local Contributions

It is the Company's general policy not to directly support state or local political candidates.

Trade Association Activities

Flowers is a member of several business, food, consumer goods and manufacturing industry trade associations at the federal, state, and local levels. Most of these organizations engage in lobbying activities, operate their own political action committees, and engage in political education programs.

Flowers supports trade associations through the payment of annual dues. In some instances, the Company makes additional payments in the form of contributions and special assessments to support special projects and coalition activities, including lobbying projects at the federal and state levels. Flowers exercises no authority over decisions made by trade associations regarding the direction of their political contributions and related spending.

The Company's participation as a member of these associations comes with the understanding that Flowers may not always agree with all the positions of a trade association or its other members, and that Flowers is committed to voicing its concerns as appropriate through the Flowers leaders who interact with these trade associations.

Flowers Foods, Inc. Political Action Committee

Established in 1976, the Flowers Foods, Inc. Political Action Committee ("Flowers PAC") is a federally registered political action committee or "separate segregated fund" that is registered with the Federal Election Commission (FEC) and authorized to make contributions to U.S. congressional candidates, national political party committees and other political action committees who share the Company's views on public policy issues.

Flowers PAC is funded through voluntary personal contributions from selected employees in compliance with U.S. federal campaign finance laws. Consistent with federal law, all contributions made by Flowers PAC, and all individual contributions to Flowers PAC totaling $200 or more annually, are itemized in periodic disclosures to the FEC and available for public review. Flowers PAC's FEC filings can be accessed by the following link: https://www.fec.gov/data/committee/C00033555/.

Although the Company and Flowers PAC are separate legal entities, the Company is Flowers PAC's "connected organization" and as such, Flowers PAC may utilize Company funds to pay for Flowers PAC's establishment, administration and fundraising costs. Such costs may include, but are not limited to, the Company providing for Flowers PAC's office space, phones, personnel expenses, salaries, utilities, supplies, insurance, legal fees, accounting support and bank charges. The Company may pay these costs directly from its general funds or through establishing a separate administrative account to be used solely for Flowers PAC administrative and fundraising expenses, however, such payments by the Company are not tracked or reported on FEC disclosures.

Decision making with respect to Flowers PAC's activities, fundraising and disbursements are made exclusively by the Flowers PAC Chairperson, who is appointed by and serves at the discretion of the Company's Chief Executive Officer. The Chairperson is advised by a governing board (the "Governing Board") that is composed of a diverse group of Flowers employees. The Governing Board reviews and advises on the Flowers PAC budget and all specific requests for political contributions. The Chairperson is also assisted by a Treasurer and Assistant Treasurer. Flowers PAC contribution checks require the signatures of both the Treasurer and Assistant Treasurer, and the Flowers PAC Treasurer is responsible for signing and filing all FEC disclosures.

The Chairperson and Governing Board evaluate all prospective campaign contributions to candidates on a bipartisan basis, basing its giving decisions on the following factors:

- the presence of a Flowers facility within the candidate's district;

- if the candidate is an incumbent, the candidate's leadership position and committee assignments within Congress;
- the candidate's views and/or voting record on issues critical to the success of Flowers and the baking industry;
- the candidate's chances of prevailing in the election and the impact of Flowers PAC's contribution to the candidate; and
- the candidate's ethical conduct and demonstrated commitment to supporting civility, bipartisanship, diversity, inclusiveness, and democratic institutions of government.

November 18, 2022