

Carleton College

One North College Street
Northfield, Minnesota 55057

December 21, 2012

Investor Relations Department
Kraft Foods Group, Inc.
Three Lakes Drive,
Northfield, IL 60093

To Whom It May Concern:

The Investment Committee of the Trustees of Carleton College have granted us, the Committee on Responsible Investment at Carleton (CRIC), authority to support shareholder resolutions. In the spring of 2012, we decided to vote for the resolution in support of Lobbying Expenditure Disclosure. At the time, Carleton held 24,400 shares of Kraft Food stock. We and many other shareholders are very concerned about this issue. We believe that it is important that Kraft Food's lobbying expenditures and positions, as well as processes to influence public policy, are transparent and publicly available. Corporate influence on Congress and public policy is a challenge to our democracy and as a college, where we promote citizenship; we believe that transparency is crucial to a fair democracy—and to the long-term health of corporations. Additionally, questionable lobbying activity may pose risks to the company's reputation when controversial positions are embraced, and as investors we want to be able to evaluate that spending. Hence, we believe full disclosure of Kraft Food's policies, procedures and oversight mechanisms is warranted.

The full resolution is attached for your information.

Shareholders in growing numbers support proxy resolutions calling for disclosure of lobbying expenditures. We look forward to hearing from you and will share your response with the leadership of Carleton College.

Sincerely,


Fadi Hakim '13, Co-Chair of CRIC - hakimf@carleton.edu
Joel Weisberg, Co-Chair of CRIC - jweisber@carleton.edu
On behalf of the Carleton College Trustees

Lobbying Expenditures Disclosure
2012 – Kraft Foods Inc.

WHEREAS, corporate lobbying exposes our company to risks that could affect the company's stated goals, objectives, and ultimately shareholder value, and

WHEREAS, we rely on the information provided by our company to evaluate goals and objectives, and we, therefore, have a strong interest in full disclosure of our company's lobbying to assess whether our company's lobbying is consistent with its expressed goals and in the best interests of shareholders and long-term value.

RESOLVED, the shareholders of Kraft Foods Inc. ("Kraft") request the Board authorize the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing the lobbying of legislators and regulators, including that done on our company's behalf by trade associations. The disclosure should include both direct and indirect lobbying and grassroots lobbying communications.
2. A listing of payments (both direct and indirect, including payments to trade associations) used for direct lobbying as well as grassroots lobbying communications, including the amount of the payment and the recipient.
3. Membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by the management and Board for
 - a. direct and indirect lobbying contribution or expenditure; and
 - b. payment for grassroots lobbying expenditure.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation, (b) reflects a view on the legislation and (c) encourages the recipient of the communication to take action with respect to the legislation.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee of the Board or other relevant oversight committees of the Board and posted on the company's website.

Supporting Statement: As shareholders, we encourage transparency and accountability in the use of staff time and corporate funds to influence legislation and regulation both directly and indirectly. We believe such disclosure is in shareholders' best interests. Absent a system of accountability, company assets could be used for policy objectives contrary to Kraft's long-term interests.

Kraft spent approximately \$6.39 million in 2009 and 2010 on direct federal lobbying activities, according to disclosure reports (U.S. Senate Office of Public Records). In 2010, according to disclosure reports required in six states, Kraft also spent at least \$548,436 on lobbying expenditures. These figures may not include grassroots lobbying to directly influence legislation by mobilizing public support or opposition and do not include any lobbying expenditures to influence legislation or regulation in states that do not require disclosure. And Kraft does not disclose its contributions to tax-exempt organizations that write and endorse model legislation, such as Kraft's \$5,000 contribution to the American Legislative Exchange Council ("ALEC") annual meeting (<http://thinkprogress.org/politics/2011/08/05/288823/alec-exposed-corporations-funding/>).

We encourage our Board to require comprehensive disclosure related to direct, indirect and grassroots lobbying.