

CarMax Corporate Political Contribution Policy

CarMax, Inc. (“CarMax” or the “Company”) believes in responsible participation in the political process because public policy decisions made by elected officials may significantly impact our operations, associates, or customers. This responsible participation includes prudent corporate political contributions, where permitted. CarMax chooses not to operate a Political Action Committee. CarMax does not make contributions to candidates for federal office, to national party committees, or in states where only Political Action Committee contributions are permitted. Additionally, CarMax does not make direct independent expenditures on behalf of candidates in any state or at the federal level.

Procedure and Criteria

CarMax screens all requests for corporate political contributions for their legality and their appropriateness. Senior Management approves the Government Affairs Budget, including the contribution budget, annually. All contributions must be approved by the Assistant General Counsel for Government Affairs. All corporate political contributions over \$1,000 must be approved by the General Counsel. The General Counsel receives quarterly reports of all other contributions. The Company’s Government Affairs activities are reported to the Nominating and Governance Committee annually. In deciding to make contributions to candidates, we consider many factors, including, but not limited to:

- The candidate’s support for maintaining a competitive business environment;
- The candidate’s support for issues important to CarMax; and
- The candidate’s service in leadership or on key committees, as well as the candidate’s potential for leadership or committee service.

CarMax does not consider political party affiliation as a criterion for making a corporate political contribution.

Disclosure

Every state where CarMax makes corporate political contributions requires disclosure of contributions by the candidate, by the contributing entity, or both. CarMax reports every corporate political contribution where disclosure is required by the contributing entity. In states where corporate political contributions are required to be disclosed by the candidate only, CarMax reviews those disclosure reports for accuracy. These corporate political contribution reports are available at applicable state agencies.

Trade Associations

Like most large corporations, CarMax is a member of many state and national trade associations that advocate on state and federal policy. These organizations are required to report the portion of dues received from CarMax that were used for non-deductible political purposes in order to ensure compliance with the Internal Revenue Code. While CarMax may not always

agree with the positions taken by these groups, it does monitor them to ensure that, in general, their advocacy positions are consistent with CarMax's business interests.

Adopted by the Nominating and Governance Committee of the Board of Directors of CarMax, Inc. – April 19, 2016