# EDISON INTERNATIONAL POLITICAL ENGAGEMENT POLICY

Adopted May 1, 2010 Last Amended January 2, 2024

Political developments at the federal, state, and local level can have a significant impact on Edison International ("EIX") and our consolidated subsidiaries (together, the "Company"), and our stakeholders. Therefore, the Company believes it is our responsibility to actively participate in the political process by making contributions to candidates, political parties and political action committees that support policies consistent with our values and help advance our mission and business strategy.

The Company publicly reports our political activities, including oversight processes and policies on direct political spending, spending through trade associations or other third parties, and all other election-related activities.

#### **Political Contribution Criteria**

The Company will only make political contributions and expenditures that comply with the law, adhere to the EIX Employee Code of Conduct, and meet the following criteria:

- All political contributions or expenditures must reflect Company interests and not those of individual employees, officers or directors
- All political contributions and expenditures must be approved in writing by the appropriate officer as described below
- No political contributions and expenditures will be made in anticipation of, or in return for an official act or anything that has the appearance of a gratuity, bribe, trade or quid pro quo of any kind
- No part of the rates paid by Southern California Edison customers will be used for political contributions and expenditures

The Company also considers other criteria when determining whether to make a political contribution or expenditure, including the recipient's alignment with our values, business strategy and key policy areas, including healthy democracy, pro-business, energy and sustainability, and the broader societal impact of the contemplated expenditure.

Employees will not be reimbursed directly or through compensation increases for personal contributions or expenses, and the Company will not pressure or coerce employees to make personal political expenditures or take any retaliatory action against employees who do not make such expenditures.

#### **Political Action Committees**

The Company generally prefers to make political contributions directly with corporate funds. However, federal election laws prohibit corporations and labor unions from making political contributions to federal candidates and national political parties. As a result, in accordance with federal law, the Company sponsors the Edison International Political Action Committee ("EIPAC"), which is funded by voluntary contributions from eligible employees, shareholders and their families, to make contributions to candidates for federal office.

The EIPAC is guided by an Advisory Council comprised of participating employees who regularly consult with Company leaders about political engagement priorities, as well as EIPAC member development, growth and retention activities.

A number of states and municipalities, including California, allow the use of Company funds to make contributions to state and local candidates for public office and to political parties, while other states prohibit this practice. In accordance with California law, the Company sponsors the Edison International Civic Action Committee ("EICAC"), a small contributor committee funded by employee and retiree contributions to make contributions to state or local candidates or to support or oppose ballot measures.

The Company also sponsors Powering California's Future ("PCF"), a California general purpose committee that makes political expenditures independent of any candidate or ballot measure.

## **Independent Expenditures and Tax-Exempt Organizations**

As permitted by law, the Company may make independent political expenditures directly or indirectly by contributing corporate funds to PCF or to other committees that make independent expenditures.

The Company makes donations to various tax-exempt organizations for a variety of reasons. These donations generally are not made with the intent to support or oppose specific candidates or ballot measures.

# **Budget and Approval Process**

EIX establishes an annual budget for political contributions made directly with corporate funds to candidates, political parties and political action committees. This budget is administered by EIX Corporate Affairs and does not include planned contributions by EIPAC, EICAC or PCF.

All political contributions made by the Company, EIPAC, EICAC, or PCF, are reviewed by the Company's outside legal counsel and must be approved by the most senior EIX officer responsible for Corporate Affairs or, in his or her absence, the EIX Chief Executive Officer. In addition, contributions that exceed \$100,000 must also be approved by the EIX Chief Executive Officer and contributions that exceed \$1,000,000 must also be approved by the Audit and Finance Committee of the EIX Board of Directors.

The Company's independent expenditures and donations to tax-exempt organizations for the purpose of supporting or opposing a specific candidate or ballot measure must also follow this approval process.

## **Lobbying Activities**

The Company participates in the public policy process to advance the interests of the Company and aligned stakeholders. The Company's lobbying activities are conducted in compliance with federal, state and local laws in a manner consistent with our values.

EIX Corporate Affairs coordinates the Company's lobbying activities with federal, state, and local governments. Employees who engage in direct or indirect communications with federal, state or local public officials are required to coordinate with Corporate Affairs and provide periodic compliance reports listing their lobbying activities. The most senior EIX officer responsible for Corporate Affairs oversees and reviews the Company's lobbying activities, including the retention and annual review of lobbyists, priorities for legislative and administrative action, and decisions on lobbying expenditures. Management regularly reports to the EIX Board of Directors on the Company's advocacy to advance our business strategy and key policy priorities.

The Company occasionally engages in grassroots lobbying activities, which are disclosed as required by law.

# **Trade Associations and Business Memberships**

The Company is a member of various industry, trade and business associations representing the utility industry and the business community. Engaging with other business and industry stakeholders helps gain perspective and arrive at consensus on broad public policy issues that impact the Company and our stakeholders.

While the Company may not always agree with the positions taken by an association or its members, corporate memberships enable the Company to learn the views of others, obtain feedback from them, influence association positions and ultimately voice any concerns, perspectives and positions on proposed legislation and regulations in a more educated and balanced way.

The Company seeks to ensure that our trade associations are aligned with our clean energy strategy through engagement with their leadership and policy committees and reviews the public energy and climate positions of trade associations that receive at least \$50,000 annually to ensure their positions are generally aligned with the Company's.

The Company prohibits our trade associations and 501(c)(4) organizations from using Company payments for electoral or political purposes. The Company also prohibits 501(c)(4) organizations from using Company payments for lobbying purposes without the Company's consent.

### **Board of Directors Oversight, Reporting and Public Disclosure**

The Audit and Finance Committee of the EIX Board of Directors, comprised entirely of independent directors is responsible for oversight of the Company's political policies, activities and risks. In this role, the Audit and Finance Committee annually reviews the EIX Political Engagement Policy and the corporate political contribution budget for the upcoming year.

At least semi-annually, the Audit and Finance Committee reviews the Company's semi-annual political expenditure report listing the following political activities of the Company, EIPAC, EICAC and PCF for the specified period:

- Contributions made to political candidates, political parties, political action committees or ballot measure committees
- Contributions made to other tax-exempt organizations (such as 527 organizations) that are earmarked or intended to support or oppose specific candidates or ballot measures
- Independent political expenditures
- The non-deductible portion of dues or other payments made by the Company to trade associations that were used for lobbying or political activities, to the extent that the annual payment received by the trade association from the Company is at least \$50,000 and such non-deductible amount is provided to the Company by the trade association
- Contributions of \$2,500 or more to organizations made at the request, suggestion, or solicitation of, or made in cooperation, consultation, coordination, or concert with a public official or the agent of a public official
- The aggregate amounts paid by the Company for federal and state lobbying activities

The information provided to the Audit and Finance Committee is posted on our public website at <a href="www.edison.com/corpgov">www.edison.com/corpgov</a>. The information in the Company's semi-annual reports may be consolidated into one annual report for each year.