A MESSAGE FROM OUR PRESIDENT AND CEO

Edison International has a rich history of more than a century of innovation. As we work to adapt and thrive in an industry that is rapidly evolving, one thing that will never change is our commitment to conduct our business safely, ethically and in compliance.

This commitment, and the principles that define who we are as an organization, are expressed in our company values. Our Employee Code of Conduct helps us live these values in our daily work.

I ask that each of you read our Code and use it as a resource to help make ethical choices. Our continued success as a company, and achieving that success ethically, depends on all of us living up to our Code and doing the right thing.

Pedro J. Pizarro

President and Chief Executive Officer
Edison International
OUR COMMITMENT TO ETHICS AND COMPLIANCE

At Edison International, and our companies, we are committed to upholding our values and complying with the laws and regulations that apply to our business. Our Employee Code of Conduct provides a high-level overview of key policies that help us uphold this commitment. The Code lays the foundation for our approach to business and is one of many resources intended to help us navigate the challenges we face every day.

It’s important to note that our Code does not cover every rule or requirement we must follow. We have company policies that further expand on the topics covered here, as well as other applicable topics to help us maintain compliance. Each of us is required to understand and follow this Code, our policies and the laws and regulations applicable to our business. We maintain a separate code for our Board of Directors (Ethics and Compliance Code for Directors).

This Code, like our values, is a guide for our behavior and makes clear that our actions should be consistent with our words. In line with this, we expect those we do business with to meet equally high standards. We maintain a separate code for our company suppliers (Supplier Code of Conduct) to ensure our expectations for these groups are clearly communicated.

By complying with the letter and spirit of our Code, we demonstrate our commitment to ethics and compliance and to upholding our values.
**SPEAKING UP**

No one is expected to have all the answers. Every situation is unique. We encourage you to raise any questions you may have to help you do the right thing.

It's important that you feel comfortable seeking advice. It's equally important that you feel empowered to report concerns. No one is expected to make difficult decisions alone, and no one should feel pressured to do something that doesn't seem right. To ensure that we can address ethics or compliance concerns, we all must report any actual or potential misconduct. To promote an open environment where everyone feels comfortable speaking up, we do not tolerate retaliation of any kind.

Violations of our Code, policies and the law have serious consequences for the individuals involved. They may include disciplinary action, up to and including termination. Certain violations may also subject those involved as well as our company to civil liability, criminal prosecution or reputational damage, making it all the more important that we ask questions and raise concerns before we take action.

We make several resources available to you to seek advice or report concerns. You can always:

- Speak with a supervisor or manager
- Contact Ethics and Compliance
- Contact the Edison HelpLine or
- Contact Human Resources

Questions or reports may be submitted anonymously to the Edison HelpLine, which can be reached via phone at (800) 877-7089 or via the web at www.EdisonHelpLine.com.

**Retaliation:**

Retaliation can take a number of forms but is typically any action taken to discourage the reporting of actual or potential misconduct or to punish someone for making such a report or participating in an investigation. It can be actions taken by a peer, a direct supervisor, a leader or anyone else in the company.

No matter the circumstances, retaliation is never tolerated. It undermines our commitment to ethics and compliance and stands in stark contrast to our values. You are expected to live our value of integrity by reporting any actual or suspected acts of retaliation.

See the [Compliance, Reporting and Non-Retaliation Policy](#) for more information.
The company expects that each of us will always do the right thing.

But, sometimes what is right isn’t clear. When faced with questions, you should ask yourself:

- Is it legal?
- Does it comply with our Code and policies?
- Is it in line with our values?
- Does it feel right?
- Would I feel comfortable if my family and friends knew about it?

If your answer is “no” to any of these questions, or if you’re just not sure, you should:

Stop.

Think it through.

Seek advice.
SAFETY

Safety is integral to everything we do at Edison — lives depend on it. Safety is a personal commitment that we act upon so that we all return home free from harm at the end of every day. You are empowered and expected to speak up and stop work if you become aware of any unsafe working condition.

To support a safe work environment, we do not engage in any violent, threatening or bullying behavior. Weapons, unless authorized as part of your job, are not permitted. You are required to show up and perform work fit for duty.

Our commitment to safety extends beyond our own employees. We also work to protect the environment and the safety of our business partners and the public. Everyone is expected to speak up and stop work if there is an imminent hazard to anyone's safety or the environment.

Fit for duty:

Being fit for duty means being able to perform all functions of a job safely — not under the influence of drugs or alcohol or in any condition that could impair judgment.

See the Environmental Policy, Health and Safety Policy, Physical Security and Cybersecurity Policy, Workplace Violence Prevention and Prohibition of Weapons Policy and the Fitness for Duty Policy for more information.
DISCRIMINATION AND HARASSMENT

We promote an inclusive work environment and value diversity. We do not tolerate discrimination based on an individual’s protected characteristics and prohibit harassment of any kind, including sexual harassment, whether it be verbal, visual or physical.

See the Equal Employment Opportunity Policy and the Prohibition of Harassment, Including Sexual Harassment Policy for more information.
CONFLICTS OF INTEREST

We know that we do our best work when our judgment isn't compromised by a conflict of interest. Whether it's a business courtesy, outside employment, supervising a relative or some other potential conflict, we require you to report any actual or perceived conflict of interest to the company so that appropriate steps can be taken.

Since we don't give anything of value with the intent to inappropriately influence business decisions, we likewise don't accept anything of value intended to inappropriately influence us. We have specific rules for giving and receiving business courtesies to help ensure that work decisions are always made based on sound business judgment.

Conflict of interest:

A conflict of interest occurs when someone’s personal interests, activities or relationships compromise or interfere with Edison’s interests. Basically, a conflict occurs when an individual’s loyalty or duty to act in the best interest of the company is divided by a personal interest.

A wide range of situations can pose a conflict of interest. Examples of some potential conflicts include:

• Supervising a relative or significant other
• Holding outside employment that interferes or overlaps with Edison work
• Accepting business courtesies from a supplier in the bid or contract process
• Serving as an Edison supplier while employed by Edison or engaging a family member’s company as an Edison supplier
• Participating in decisions related to Edison while serving as a public official

It's not just actual conflicts that are a concern—even the appearance of a conflict can pose a problem.

Business courtesy:

A business courtesy is a gift, meal, entertainment or other item of value given by or to a business partner free of charge or at a cost that is less than market value. A business courtesy can pose a conflict of interest because it can create a sense of obligation to the provider.

See the Conflicts of Interest Policy for more information.
USE OF COMPANY ASSETS

Our company assets are critical to helping us conduct business. This includes our physical assets, such as computers and machinery, and intangible assets, like company time, patents and proprietary information. While we allow limited incidental use of some of these assets, we require you to protect and use them professionally.

Incidental use:

Incidental use of company assets includes limited use of items such as company telephones, computers, printers and other equipment for personal reasons, so long as the use is not excessive and does not turn into a distraction, prevent someone from performing their job or result in a personal profit for you, your relative or friend.

See the Use of Company Assets Policy, Physical Security and Cybersecurity Policy, and the Copyright Permitted and Fair Use Policy for more information.
DATA PRIVACY

Given the nature of our work, we are entrusted with the personal information of our customers, our employees and other third parties. We limit access to personal information to those with a legitimate business need to know the information. All employees entrusted with personal information are required to safeguard the information and use it only for the business purpose for which it is intended.

See the Privacy Policy for more information.

INSIDER TRADING

Certain information about our company can impact its stock price. We comply with securities laws by refraining from buying or selling securities, either directly or indirectly, while in possession of material, non-public information and from sharing this type of information with others.

Material, non-public information:

Information, whether positive or negative, is considered material if a reasonable investor would consider it important when deciding whether to buy or sell securities or if it is likely to affect the price of securities. Information is considered non-public if it has not been broadly disclosed to the general public or has been only partially disclosed.

See the Insider Trading Policy for more information.
ANTI-CORRUPTION

We conduct ourselves with integrity and deal fairly with others. We do not resort to corruption to get things done. We do not use bribery or any other form of inappropriate influence in our business dealings, and we don't allow third parties to engage in this type of corrupt conduct on our behalf.

See the Anti-Corruption Policy for more information.

ACCURATE BOOKS AND RECORDS

We take care to ensure the integrity of our business records, whether hardcopy or electronic. You are expected to create accurate and complete records, including those that document the company’s financial and operational performance, and to retain records pursuant to the company’s retention policies.

See the Accurate Books and Records Policy, Records Management Policy, and Record Retention Schedule for more information.
Utility Regulation

Our utility company, Southern California Edison, is subject to state and federal regulations covering a wide range of topics. In compliance with all of these regulations, our utility employees take steps to ensure the reliability of our electricity infrastructure, maintain separation between our transmission operations and our energy marketing and procurement operations, and oversee the transactions between our utility and affiliate companies to prevent any preferential treatment.

Utility and affiliate companies:

Southern California Edison, an Edison International company, is an electric utility. Edison International’s non-utility companies are considered affiliates under California’s Affiliate Transaction Rules. The affiliate companies that provide products or services that relate to the use of electricity are subject to specific requirements limiting interactions between the utility and affiliate companies.
EXTERNAL COMMUNICATION

Recognizing that the information we communicate helps our stakeholders make informed decisions, we work to ensure our public statements are accurate and consistently voiced in all forms of communication. We limit official company communication to authorized spokespersons and encourage you to make it clear in your personal communications that you’re not speaking on behalf of the company.

See the External Communications Policy and the Electronic Communications and Social Media Use Policy for more information.

POLITICAL AND COMMUNITY ACTIVITIES

Involvement in our local communities is a big part of who we are. We encourage employee volunteerism and charitable contributions for worthy causes that benefit our communities. You are free to participate in political activities on your own behalf using your personal time and resources. Any political activity undertaken by, or on behalf of, the company is strictly regulated. We limit these activities to designated employees who are tasked with maintaining compliance with all applicable political activity, lobbying and government ethics laws.

See the Political Activities Policy, Fundraising Policy, and Conflicts of Interest Policy for more information.
WAIVERS

There may be compelling circumstances that warrant a waiver from a provision of this Code. Waivers will be granted only on an individual, situation-specific basis, rather than on a blanket basis. Waivers will also be of limited duration to the extent possible. A request for a waiver must be in writing, directed to the senior officer in charge of your operating unit, and approved by Ethics and Compliance. If the waiver involves that officer, the request should be directed to that officer's leader. If the waiver involves an executive officer, as defined in Securities and Exchange Commission rules, the waiver must be approved by the Board of Directors or its audit committee and disclosed in accordance with SEC and stock exchange rules.
Our Policies

This Code does not cover every topic relevant to our commitment to ethics and compliance. Our key company policies are listed below. The complete list of our company policies can be found on the Our Policies page on Portal.

Accurate Books and Records
- Accurate Books and Records Policy
- American Recovery and Reinvestment Act Policy
- Corporate Employee Personnel File Policy
- Corporate Expenditures Policy
- Delegation of Signature and Approval Authority Policy
- Internal Control Policy
- Records Management Policy
- Travel and Employee Expense Policy

Anti-Corruption
- Anti-Corruption Policy

Company Assets
- Use of Company Assets Policy
- Company Vehicle and Driver Policy
- Discoveries and Inventions Policy
- Fundraising Policy
- IT Assets Policy
- IT Products and Services Authorization Policy
- Land Use Policy
- Material and Equipment Sales Policy
- Non-Electric Facility Space, Parking, and Furniture Policy
- Use of Company-Owned, Contracted and Chartered Aircraft Policy

Compliance, Reporting and Non-Retaliation
- Compliance, Reporting and Non-Retaliation Policy

Conflicts of Interest
- Conflicts of Interest Policy

Employment
- Employment Policy
- Background Investigations Policy
- Corrective Action Policy
- Equal Employment Opportunity Policy
- Exempt Employee Work Schedules and Supplemental Pay Policy
- Fitness for Duty Policy
- Job Protected Leave Policy
- Jury Duty Policy
- Non-Exempt Employee Work Schedules and Overtime Policy
- Performance Appraisal Policy
- Personal Leave of Absence Policy
- Professional Conduct Policy
- Prohibition of Harassment, Including Sexual Harassment Policy
- Supplemental Workers Policy
- Time Off and Pay for Military Service Policy
- Vacation Policy
- Vacation Donation Policy

Environmental, Health & Safety
- Environmental Policy
- Health and Safety Policy
- Navigable Airspace Obstruction Evaluation, Notification and Marking Policy

External Communications
- External Communications Policy
- Communications and Interactions with the CPUC Policy
- Copyright Permitted and Fair Use Policy
- Disclosure Policy
- Electronic Communications and Social Media Use Policy
- Political Activities Policy

Insider Trading
- Insider Trading Policy

Physical Security and Cybersecurity
- Physical Security and Cybersecurity Policy
- Personal Computing Device Access Policy
- Workplace Violence Prevention and Prohibition of Weapons Policy

Privacy
- Privacy Policy

For Edison Energy employees, go to your Portal to view these policies in the Edison Energy Policy Manual. If you’re not sure how these policies apply to your job, please talk with your supervisor or manager or call the Edison HelpLine to inquire.