

# **EDISON INTERNATIONAL POLITICAL CONTRIBUTION POLICY**

**Adopted May 1, 2010  
Last Amended October 31, 2018**

Elected officials and ballot measures can have a significant impact on Edison International (“EIX”) and its consolidated subsidiaries (together, the “Company”), and on its customers, shareholders and employees. Accordingly, the Company exercises its responsibility to actively participate in the political process by supporting and opposing candidates for public office and ballot measures.

As part of such participation, the Company may from time to time make political contributions to candidates, political parties and political action committees. All such contributions or expenditures will reflect Company interests and not those of individual officers or directors.

The Company will only make political contributions that comply with the law and that adhere to the EIX Employee Code of Conduct. Employees will not be reimbursed directly or through compensation increases for personal political 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.

## **Political Action Committees**

Federal election laws prohibit corporations and labor unions from making political contributions to federal candidates and national political parties. However, federal law allows corporations to form political action committees (“PACs”) funded by voluntary contributions from eligible employees, shareholders and their families. Such PACs can make contributions to candidates for federal office. Under this authority, EIX has formed the Edison International PAC (“EIPAC”), which makes such contributions.

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. From time to time, the Edison International Civic Action Committee (“EICAC”), a California small contributor committee funded by employee and retiree contributions, may make contributions to state or local candidates or to support or oppose ballot measures.

## **Approval Process**

EIX authorizes an annual corporate political contribution budget that is administered by the EIX Government Affairs department. Events may dictate making contributions that are not included in the annual budget. In such instances, the most senior EIX officer responsible for Government Affairs may approve additional expenditures. The EIX political contribution budget does not include contributions by EIPAC or EICAC.

All political contributions made by the Company, EIPAC or EICAC must be approved by the most senior EIX officer responsible for Government Affairs, or in his or her absence, the EIX Chief Executive Officer. Furthermore, all contributions that exceed \$50,000 must be approved by the EIX Chief Executive Officer. Finally, any contribution that exceeds \$1,000,000 must also be approved by the EIX Board of Directors. In addition, all political contributions are approved by the Company's outside counsel to ensure that they comply with applicable law.

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

As permitted by law, the Company may engage in independent expenditures, including using corporate funds as part of its political contribution program to contribute to a recipient committee of its own and to other committees that make independent expenditures in direct support of or opposition to a campaign with the approval of the EIX Chief Executive Officer.

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. If the Company makes a donation for the purpose of supporting or opposing a specific candidate or ballot measure, that payment would be reviewed and approved as described in the Approval Process section above.

## **Trade Associations and Business Memberships**

The Company holds memberships in 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 its shareholders, customers and employees.

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.

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

The Audit Committee of the EIX Board of Directors, comprised entirely of independent directors, is responsible for oversight of the Company's political activity. In this role, the Audit Committee annually reviews the EIX Political Contribution Policy and the corporate political contribution budget for the upcoming year. At least semi-annually, the Audit Committee reviews a written report listing the following political activity of EIX, SCE, EIPAC and EICAC for the specified period:

- (a) contributions made to political candidates, political parties, political action committees or ballot measure committees;
- (b) contributions made to other tax-exempt organizations (such as 527 or 501(c)(4) groups) that are earmarked or intended to support or oppose specific candidates or ballot measures;
- (c) independent expenditures; and
- (d) 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 total 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.

This information is posted on the EIX website after being reviewed by the Audit Committee.