


EIX	PGR	LOBBYING	POLICY	Doc. No.	231	
				Version	1	
Effective Date		June 17, 2016				
Supersedes		Political Activities (SCE - v.2. Published 7/3/2002)				
Political Activities						

1.0 POLICY STATEMENT

Edison International and its affiliates (the “Company”) engage in political activities, including communicating with federal, state, and local public officials. As required by law, the Company makes required disclosures of its political activities and verifies such disclosures. The Company’s Government Affairs department files all disclosure documents, as required, with federal, state or local agencies. This policy outlines the requirement that all employees coordinate any political activities through Government Affairs so the Company’s activities are compliant with the law and can be accounted for and appropriately disclosed.

Definitions of important terms used in this policy are provided under the “Definitions” section below. These terms are capitalized in this policy.

2.0 APPLICABILITY

This policy applies to all employees, sometimes referred to herein as “you,” of Edison International and Southern California Edison. Edison Energy Group employees must follow the applicable policy provisions in their company’s policy manual.

3.0 POLICY DETAIL

3.1 Communicating with Federal, State or Local Officials

The Company regularly engages in direct communications with Government Officials. All Company employees who communicate with Government Officials must work with Government Affairs to ensure their activities are permitted and, if required, disclosed under the applicable federal, state local or local law. Government Affairs works with employees to determine when registration as a Lobbyist in a particular jurisdiction is required.

3.1.1 Political Activities Compliance Report

The Company registers as a Lobbying organization and fulfills applicable registration, reporting, disclosure, and accounting requirements that relate to its Lobbying activities. Besides reporting the time and expenses of its Lobbyists, the Company also reports the activities of its non-Lobbyist employees that support Lobbying activities. If you have incurred expenses to meet with Government Officials or if your job responsibilities include directly communicating with Government Officials for the purpose of influencing official action (or preparing materials for others who engage in such communication), you must complete the Company’s Political Activities Compliance Report (“the monthly report”) and submit it to Government Affairs.

Government Affairs distributes the monthly reporting survey on or about the first business day of each month. The monthly reporting survey covers the prior month’s activities. If you receive the monthly reporting survey, you must provide the requested information and submit the completed survey to Government Affairs within eight days, unless you are on approved vacation/leave or otherwise receive a time extension to respond from your management or Government Affairs.

If you have directly communicated with Government Officials or government employees to influence official action, and you have not received the survey, you must contact Government Affairs at political.compliance@edisonintl.com.

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3.2 Political Contributions

Occasionally, when appropriate, the Company will make political contributions under the [Edison International Political Contribution Policy](#), which is publicly available at www.edison.com/corpgov. If you wish to make a political contribution on behalf of the Company, invite political candidates to make appearances at Company facilities or provide other Company support to a political candidate, political action committee or political party, you must obtain prior approval from Government Affairs.

Be aware that certain jurisdictions have adopted “pay to play” rules related to official action when the Company does business in the jurisdiction. Such rules may prevent officials who have received campaign contributions or Gifts from the Company or personnel who are representing the Company from voting on matters involving the Company. If you represent the Company in a matter with a government entity that will vote to approve or otherwise take action on a Company-related matter, you must contact Government Affairs for a list of jurisdictions that have adopted this type of rule. Government Affairs will inform you of the potential consequences for the Company if contributions or Gifts are provided to officials who will vote to approve or otherwise take action on the matter.

3.3 Gifts to Government Officials

Gifts to Government Officials and members of their staff may be banned, limited, or result in disqualification and in many instances must be reported by the Company. A simple interaction, such as providing a Government Official with a meal or beverage at a business meeting, can constitute a Gift. You must obtain prior approval from Government Affairs prior to making any Gift to a Government Official. Email gifts@edisonintl.com if you wish to provide a Gift to a Government Official or any Immediate Family Members of a Government Official. Often, gifts to Immediate Family Members of Government Officials are treated as gifts to the official. Bribes are strictly prohibited.

3.4 Dues and Memberships

The Company may have to disclose certain dues and membership payments on reports filed with government regulators. The [Edison International Political Contributions Policy](#) outlines some of these disclosure requirements. In some cases, such as a payment to a 501(c)(4) social welfare organization, protocol requires the organization to provide the Company with certain information prior to payment. Government Affairs must review the proposed payment in advance. Questions related to these types of payments must be directed to Government Affairs.

3.5 Conflicts of Interest Related to Political Activities

The [Conflict of Interest Policy](#) outlines additional restrictions related to political activities compliance. Discussions about potential employment at the Company with any of the following individuals are prohibited without first contacting Human Resources Talent Acquisition or the Ethics and Compliance Department:

- a. currently elected or appointed Government Officials
- b. employees of a legislative, regulatory or governing agency with jurisdiction over the Company or its facilities

Refer to the [Conflicts of Interest Policy](#) for additional requirements about recruiting or hiring current or former Government Officials, seeking public service as an elected or appointed official or providing Gifts, including meals and entertainment to Government Officials.

4.0 POLICY VIOLATIONS

Any violation of this policy may result in disciplinary action, up to and including termination of employment, and, in some cases, the possibility of civil or criminal liability.

5.0 DEFINITIONS

Contributions: Money, loans, property, services, or any other items of value, including Company funds, equipment, supplies and employee time.

Gifts: With certain limited exceptions, Gifts are property or services received by a Government Official without payment or consideration. Gifts may be banned, limited or disqualifying.

Government Official: The term “Government Official” is very broad and can include officers and employees of a federal, state or local governmental entity. Employees of federal, state or local agencies or departments, such as a customs officers or fire inspectors, are Government Officials. This category includes:

Type of Government Official	Examples
Official or employee of any federal, state or, local government entity	A federal or state executive or legislative branch employee or a local government employee (such as law enforcement, firefighter, permit inspector, planner, engineer or financial analyst)
Elected official	A Member of Congress, state legislator, supervisor, mayor, council member, school board member or special district board member (such as a water board member)
Appointed official	A federal, state or local board or commission member
Consultant - Private person acting temporarily in an official capacity for or on behalf of any government entity	A government consultant acting under government authority
Candidate	A candidate for federal, state or local office
Political party official	A federal, state or local political party official
Judicial official	A Judge, Magistrate or Justice of the Peace

Immediate Family Member: The spouse and dependent children of a Government Official (including registered domestic partners).

Lobbying: Communicating directly or taking other action to promote, support, modify, oppose, or delay legislative or administrative action. Lobbying also includes activities of non-Lobbyist employees who provide materials to other employees who directly communicate to influence action.

Lobbyist: An individual who spends a significant amount of his or her compensated time engaging in direct communication, other than providing administrative or similar testimony, with a Government Official to influence legislative or administrative action. Lobbyists are expected to adhere to the highest standards of lawful and ethical conduct.

6.0 REFERENCES

External References

None

Internal References

- [Anti-Corruption Policy](#)
- [Communications and Interactions with the CPUC Policy](#)
- [Conflicts of Interest Policy](#)
- [External Communications Policy](#)
- [Edison International Political Contributions Policy](#)
- [Government Affairs Portal Page](#)

7.0 KEY CONTACTS

Government Affairs: [Cody Tubbs](#), PAX#22613 or (626) 302-2613

Edison
HelpLine
Seek advice | Report concerns

Talk to your supervisor **OR** call the new
Edison HelpLine to seek advice or
report concerns related to:

- Ethics or compliance misconduct
- Work environment
- Non-emergency security issues

1-800-877-7089

www.EdisonHelpLine.com

24 hours/day **7** days/week

You can choose to identify yourself or remain anonymous.
Edison absolutely prohibits retaliation.

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