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
COMMITMENT TO OUR VALUES, ETHICS AND COMPLIANCE

At Edison International, and our companies, we’re 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 with the decisions we face every day.

Our Code does not cover every rule or requirement we must follow. Our company policies expand on the topics covered here to provide additional direction. 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 communicate our expectations to these key stakeholders.

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

We live **Safety**

We pursue **Excellence**

We conduct our business with **Integrity**

We strive for **Continuous Improvement**

We treat everyone with **Respect**

We recognize the strength of **Teamwork**
SPEAKING UP

No one is expected to have all the answers. Every situation is unique. We encourage you to raise any questions or concerns you may have and encourage others to do the same.

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 we can address ethics or compliance concerns, we must report any actual or potential misconduct by Edison employees or suppliers. To protect our employees and provide an environment where everyone feels comfortable speaking up, we don't tolerate retaliation of any kind.

Reports filed with the Edison HelpLine will be reviewed and triaged. Some may require an investigation into the facts. If you make a report, the results of the review or investigation will be communicated back to you.

Violations of our Code, policies and the law could 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 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 noncompliance, 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.

Regardless of 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.

EMPLOYEES MUST BE TRUTHFUL AND FORTHRIGHT IN ALL INTERACTIONS WITH EDISON, INCLUDING INVESTIGATIONS.
THE COMPANY EXPECTS EACH OF US TO ALWAYS DO THE RIGHT THING.

But, sometimes what is right isn’t clear. In these situations, pause and 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 contact the Edison HelpLine to report the situation or seek advice.
SAFETY

Safety is integral to everything we do at Edison — lives depend on it. It is a personal commitment we act upon so we all return home free from harm at the end of every day. You’re 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 don’t engage in any violent, threatening or bullying behavior. Weapons, unless authorized as part of your job, aren’t permitted. You’re 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 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.

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 Fitness for Duty Policy, Health and Safety Policy, Physical Security and Cybersecurity Policy, Professional Conduct Policy and the Workplace Violence Prevention and Prohibition of Weapons Policy for more information.
THE ENVIRONMENT

Respect for the natural environment is critical to support our vision to lead the transformation of the electric power industry towards a clean energy future. The company is a steward of the environment by seeking out opportunities to protect the environment, implementing sustainable business practices and complying with environmental laws and regulations. We’re all responsible for conducting work in a manner that minimizes impact to the environment, complying with company policies and their implementing documents and taking prompt action to correct environmental issues. Each of us is also responsible for speaking up and stopping work if there is an imminent hazard to the environment.

Protecting and preserving the environment for the communities in which we live and work is an essential responsibility that we take seriously. This responsibility extends to our business partners and suppliers.

See the Environmental Policy and the Sustainability Report for more information.
DIVERSITY, EQUITY AND INCLUSION

Edison serves one of the most diverse communities in the nation. Our company is committed to celebrating our differences and we promote an equitable work environment where everyone feels included. Working at Edison means working with people from all backgrounds, cultures, and ethnicities, and people with varied thinking styles and life experiences. We’re committed to cultivating a workplace where everyone feels valued for who they are, everyone’s strengths are recognized, and everyone feels essential to our shared success.

See the Diversity, Equity & Inclusion Report for more information.
DISCRIMINATION AND HARASSMENT

We don't tolerate discrimination based on an individual's protected characteristics and prohibit harassment of any kind, including sexual harassment, whether 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 do our best work when our judgment isn't compromised by a conflict of interest. You must report any actual or perceived conflict of interest to the company so the company can take appropriate steps to address the potential conflict.

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 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 close personal friend
- Holding outside employment or a position 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 relative or close personal friend'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. We require you to protect and use all of these assets professionally. We allow limited incidental personal use of some of these assets.

INCIDENTAL PERSONAL USE:

Limited use of company assets for personal reasons that does not distract, prevent or impede others from conducting company business and/or otherwise complies with company policy. Edison never allows use of company assets in support of a for-profit business that personally benefits you, a relative or a friend.

You must classify and protect company information in accordance with company policies and only use company-approved methods for storing and sharing this information. Similarly, we only disclose proprietary or confidential company information compliant with company policies, agreements and the law. Our obligation to not disclose proprietary or confidential company information applies during and after employment with Edison.

In the end, protecting company assets, and using them appropriately and responsibly, helps the company meet its obligations to customers, shareholders and other stakeholders.

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

Given the nature of our work, we’re entrusted with the personal information of our customers, colleagues and other individuals. Only those with a legitimate business need are granted access to personal information. All employees are required to safeguard information and use it only for the business purpose for which it’s intended. Edison prohibits any unauthorized collection, processing or use of personal information, even if you’ve been authorized to access such data.

See the Data Privacy Policy for more information.

INSIDER TRADING

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 AND ANTI-FRAUD

We conduct ourselves with integrity and deal fairly with others. We don’t resort to corruption to get things done. We don’t use bribery or any other form of inappropriate influence in our business dealings, we never engage in any form of fraud and we don’t allow third parties to engage in this type of corrupt conduct on our behalf or in their dealings with Edison.

See the Anti-Corruption and Anti-Fraud Policy for more information.

ACCURATE BOOKS AND RECORDS

We take care to ensure the integrity of our business records, whether hardcopy or electronic. You’re 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, Information Governance Policy, and Record Retention Schedule for more information.
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 and the Federal Energy Regulatory Commission. 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. The Affiliate Compliance Office in Ethics & Compliance oversees compliance with these requirements across the enterprise.
EXTERNAL COMMUNICATION

We limit official company communication to authorized spokespersons. Because the information we communicate helps our stakeholders make informed decisions, we work to ensure our public statements are accurate and consistent. In all forms of communication, you may not disclose proprietary company information (e.g., business information or pictures of company facilities) without authorization. We only use company logos, trademarks and other symbols in alignment with our brand style standards and company values. In your personal communications, including on social media, make it clear you are not speaking on behalf of the company and the views expressed are yours alone.

See the Brand Style Standards, Electronic Communications and Social Media Use Policy and the External Communications 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. You’re 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 may only be conducted by designated employees who are tasked with maintaining compliance with all applicable political activity, lobbying and government ethics laws.

See the Conflicts of Interest Policy, Fundraising Policy, and Political Activities Policy for more information.
COMMITMENT TO HUMAN RIGHTS

Edison International respects human rights everywhere we operate. We aim to ensure everything we do, and what others do for us, is consistent both with laws and our commitment to protect human rights. We recognize the importance of ensuring respect for human rights for all individuals. We conduct our business in a way that protects human rights for all, especially those who may be at heightened risk of marginalization. We don’t use forced labor, child labor or any exploited labor and prohibit use of such labor by any entity doing work on our behalf. We are opposed to human trafficking in any form. We expect this commitment to protecting human rights to extend to our subsidiaries, suppliers, sub-suppliers and all of those who conduct business on our behalf in all geographic locations.

See the Anti-Human Trafficking 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. In situations where there is an imminent threat to life or property, a waiver is not needed before acting to prevent harm. In these cases, you can request a waiver after the incident as a means of recording the exception.
OUR POLICIES

This Code doesn’t 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
• Corporate Expenditures Policy
• Delegation of Signature and Approval Authority Policy
• Internal Control Policy
• Information Governance Policy
• Travel and Employee Expense Policy

Anti-Corruption and Anti-Fraud
• Anti-Corruption and Anti-Fraud Policy

Commitment to Human Rights
• Anti-Human Trafficking Policy

Company Assets
• Company Vehicle and Driver Policy
• Discoveries and Inventions Policy
• Fundraising Policy
• IT Assets Policy
• IT Mobile Products and Services Policy
• Land Use Policy
• Non-Electric Facility Space, Parking, and Furniture Policy
• Use of Company Assets 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
• Corrective Action Policy
• Equal Employment Opportunity Policy
• Exempt Employee Work Schedules and Supplemental Pay Policy
• Fitness for Duty Policy
• Job Protected Leave and Job Accommodation Policy
• Non-Exempt Employee Work Schedules and Overtime Pay Policy
• Professional Conduct Policy
• Prohibition of Harassment, Including Sexual Harassment Policy
• Supplemental Workers Policy

Environment
• Environmental 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
• Background Investigations Policy
• Physical Security and Cybersecurity Policy
• Workplace Violence Prevention and Prohibition of Weapons Policy

Privacy
• Data Privacy Policy

Safety
• Health and Safety Policy
• Navigable Airspace Obstruction Evaluation, Notification and Marking 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.
The Employee Code of Conduct can be found at Edison.com
Investors > Corporate Governance > Governance Documents > Employee Code of Conduct