Referrals, Recommendations, and Requests from Public Officials Regarding Employment Decisions

Exelon Policy
LE-AC-POL8-002
Rev. 8

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1. Policy Statement

1.1. Exelon Corporation, along with its subsidiaries ("Exelon" or "the Company"), is an Equal Opportunity employer committed to filling job vacancies by selecting the best-qualified, available candidates. We strive to consider a pool of available, qualified internal and external candidates for job vacancies. At times, the Company may receive requests, recommendations, and referrals from Public Officials to consider a candidate for employment or promotion at Exelon. This policy sets forth the standards and procedures applicable to any request, recommendation, or referral from a Public Official – made directly or through an agent or intermediary – to consider a candidate for any position at the Company.

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2. Policy Intent

2.1. This policy sets forth the following:

2.1.1 The process to centralize and track requests, recommendations, or referrals from Public Officials, or their intermediaries or agents, that the Company consider a candidate for employment, including a paid or unpaid internship, or promotion (collectively referred to as "Requests");

2.1.2 The circumstances under which a Request disqualifies a candidate from consideration in hiring and promotion decisions; and

2.1.3 The escalation, review, and approval procedures that apply to any candidate who is the subject of a Request to ensure employment decisions regarding the candidate align with the Company's commitment to fill job vacancies with the best-qualified, available candidates.

3. Applicability

3.1. This policy governs all employees, officers, and directors of the Company. This policy supplements, but does not supersede, existing Human Resources policies and procedures on hiring and selection, including HR-AC-111, External Recruiting, HR-AC-30, Conflicting Relationships and the Employment of Relatives, HR-AC-109, Exelon Career Opportunity System (ECOS), HR-AC-700, Employee Referral Program, and HR-AC-58, Recruiting, Hiring, and Employing Public Official Candidates.

4. Terms and Definitions

4.1. The following are definitions for terms used in this policy.

4.1.1 Public Official: Any elected or appointed official, candidate for elective office, and any employee of a federal, state, or local government department or agency. A "Public Official," for purposes of this definition, is an individual with a role or position that involves oversight of or influence over the Company's interests.

4.1.2 Request: Any request, recommendation, or referral from a Public Official, or an intermediary or agent of a Public Official, for the Company to consider a candidate for employment, including a paid or unpaid internship, or promotion.

4.1.2.1 A Request does not include communications in response to inquiries by the Company or its representatives seeking information from the current of former employer of a candidate for employment, nor does it include a communication from a Public Official seeking information about employment openings or processes that is publicly available.

5. Implementation

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5.1. Reporting and Tracking Requests

5.1.1 Requests under this Policy may come to the Company directly from Public Officials or indirectly from others, and to Company personnel at different levels of seniority and in different business units. No matter how a Request is communicated to the Company, all personnel have an obligation to promptly report Requests. Reports may be made through the business unit Government Affairs team or Compliance & Ethics.

5.1.2 Compliance & Ethics shall maintain a system to document all Requests, including but not limited to who made the Request, the date of the Request, who received the Request, the candidate(s) and position(s) covered by the Request, and the disposition of the Request ("Tracking System").

5.1.3 The Tracking System shall be used to ensure compliance with Sections 5.2 and 5.3 below; inform relevant stakeholders, including personnel in Human Resources, Government Affairs, and the Legal Department, of candidates who are the subject of Requests; and facilitate periodic reporting of Requests and their disposition to the Audit and Risk Committee of Exelon's Board of Directors as well as the Boards of Directors of Exelon's operating companies, as set forth in Section 5.4 below.

5.2. Prohibited Conduct

5.2.1 Exelon is committed to making employment decisions based on objective criteria, including the position requirements and candidate qualifications, and its decisions shall not be determined by a Request. It is prohibited to hire or promote a candidate for the purpose of influencing a Public Official, even if no Public Official has directly made a Request with respect to the candidate.

5.2.2 Consistent with the LE-AC-60, Anti-Bribery and Anti-Corruption and LE-AC-POL8-001, Interactions with Federal, State, and Local Public Officials, if a Request is made or appears to be made in exchange for offering to perform, or as a reward for, an official act for the Company:

5.2.2.1 The Request must be reported immediately to the Company's Chief Compliance & Ethics Officer or General Counsel for the operating company; and

5.2.2.2 The candidate who is the subject of the Request made in exchange for offering to perform, or as a reward for, an official act for the Company shall be disqualified from consideration for any position at the Company.

5.2.3 A candidate who is the subject of a Request is also disqualified from consideration for employment with the Company if the candidate is the spouse, domestic partner, child, sibling, parent, or parent/child/sibling-in-law of the Public Official making the Request.

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5.2.4 Candidates for employment will be required to disclose (i) whether the candidate is the spouse, domestic partner, child, sibling, parent, or parent/child/sibling-in-law of a current Public Official; and (ii) whether, to the candidate's knowledge, a Public Official has contacted the Company directly or indirectly to request or recommend that the candidate be hired.

5.2.4.1 Human Resources will report any disclosed relationships to Compliance & Ethics for review, consistent with Company policies, of the relationship and potential for a conflict of interest;

5.2.4.2 All information disclosed by candidates pursuant to this Section must be reviewed by the Chief Compliance & Ethics Officer, who must provide advance written approval for the candidate to proceed with the application process for employment or promotion.

5.2.5 Exelon's Chief Compliance & Ethics Officer, together with Human Resources, shall be responsible for ensuring that a candidate subject to the prohibitions in Section 5.2.2 or 5.2.3 of this policy is disqualified from consideration for employment and appropriately documented in the Tracking System.

5.3. Consideration of Candidates Subject to Requests

5.3.1 Any candidate who is the subject of a Request, and not otherwise disqualified from consideration under Section 5.2 of this policy, may be permitted to pursue employment opportunities with the Company subject to the following requirements:

5.3.1.1 The candidate must meet the qualifications and job requirements documented for the position to which the candidate wants to be considered, as determined by Human Resources;

5.3.1.2 The candidate's name, qualifications as documented by Human Resources, and information captured in the Tracking System, must be submitted to the following individuals, who must provide advance written approval for the candidate to proceed with the application process for employment or promotion: (1) the officer responsible for Government Affairs, hiring business unit; (2) the General Counsel, hiring business unit; and (3) the Chief Compliance & Ethics Officer;

5.3.1.3 There may be circumstances in which a candidate who is the subject of a Request is seeking employment or promotion in a jurisdiction other than the jurisdiction in which the Public Official who made the Request serves. In those circumstances, the officer responsible for Government Affairs of the business unit that received the Request, or the Chief Compliance & Ethics Officer, must inform the officer responsible for Government Affairs in any other business unit impacted by the Request;

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5.3.1.4 Exelon's Chief Compliance & Ethics Officer shall document in the Tracking System the bases for approval to submit the candidate to the hiring or promotion process; and

5.3.1.5 If approved, the candidate shall go through the Company's documented selection and hiring processes applicable to the position, including but not limited to the sourcing and screening process, interviews, testing, and assessments. See, for example, the procedures set forth in the HR-AC-111, External Recruiting.

5.4. Quarterly Reporting

5.4.1 Quarterly, the Chief Compliance & Ethics Officer shall report to the Audit and Risk Committee of the Exelon Board and the Boards of each operating company regarding all Requests received under this policy relevant to the applicable business units. The reporting shall include, but not be limited to, the number of Requests that fall under this policy, the Public Official associated with each Request, a brief summary of each Request, and the disposition of each Request.

6. Reporting Potential Policy Violations; Non-Retaliation

6.1. Reporting Potential Policy Violations; Non-Retaliation

6.1.1 Compliance with this policy is critical to sustaining Exelon's integrity in its interactions with Public Officials. Exelon is committed to a culture that encourages employees to speak up when we see something that violates – or could possibly violate – the law or our policies, and to seek help when we are unsure about the proper course of action. If you suspect a violation, or possible violation, of this policy, you have an obligation to report your concerns. There are a number of ways to report concerns or ask questions about these policies, including through:

6.1.1.1 The Compliance & Ethics email account at EthicsOffice2@exeloncorp.com

6.1.1.2 The Ethics Help Line (800-233-8442) and Web Portal (employee access to Web Portal is here). Both the Ethics Help Line and Web Portal have anonymous reporting options and are available 24 hours a day, every day of the year.

6.1.1.3 For additional information on how to report concerns, you can consult Exelon's procedure LE-AC-204, Reporting Potential Violations of the Code of Business Conduct or Supplier Code of Conduct .

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6.2. All reports will be treated confidentially to the fullest extent possible under the circumstances, consistent with the requirements of LE-AC-204, Reporting Potential Violations of the Code of Business Conduct or Supplier Code of Conduct. Exelon will not tolerate retaliation against anyone who, in good faith, raises a question or concern about a potential violation of this policy, our Code of Business Conduct, or potential non-compliance with any laws or regulations. Retaliation in any form – threats, harassment, intimidation, violence, reassignment, demotion, or firing – impedes our progress, has no place in our organization, and is subject to discipline, up to and including termination.

7. References

7.1. HR-AC-30, Conflicting Relationships and the Employment of Relatives

7.2. HR-AC-58, Recruiting, Hiring, and Employing Public Official Candidates

7.3. HR-AC-109, Exelon Career Opportunity System (ECOS)

7.4. HR-AC-111, External Recruiting

7.5. HR-AC-700, Employee Referral Program

7.6. LE-AC-60, Anti-Bribery and Anti-Corruption

7.7. LE-AC-204, Reporting Potential Violations of the Code of Business Conduct or Supplier Code of Conduct

7.8. LE-AC-POL8-001, Interactions with Federal, State, and Local Public Officials

8. Development History

Revision 0	Date: 7/1/2020
Writer(s) / Reviewer(s), Approver(s)	Kathleen Barron, David Brown, John Corse, Carter Culver, David Dardis, Brad Fewell, Tony Gay, Dave Glockner, Veronica Gomez, Kris Keys, Liz Murphy, Alex Nunez, Rodney Oddoye, Judy Rader, Wendy Stark, Melissa Washington
Reason Written	New Policy.

Revision 1	Date: 1/15/2021
Writer, Reviewer, Approver	Kristopher Keys, VP & DGC, Compliance and Ethics
Reason Written	Updated review cycle from 2 years to 1 year.

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Revision 2	Date: 5/15/2021
Writer(s), Reviewer(s), Approver(s)	Kathleen Barron, David Brown, John Corse, David Dardis, Tony Gay, Dave Glockner, Veronica Gomez, Kris Keys, Liz Murphy, Rodney Oddoye, Judy Rader, Clark Stalker, Melissa Washington
Reason Written	Modified section 3.3.1 to state Compliance may inform other business units that may be impacted by a request.

Revision 3	Date: 1/14/2022
Writer(s), Reviewer(s), Approver(s)	David Glockner, Glenn Rippie, Kristopher Keys
Reason Written	Revised sections 2.2 and to ensure consistent definitions across policies.

Revision 4	Date: MM/DD/YYYY
Writer	XXXXX, Title, Department
Executive Administrator	XXXXX, Title, Department
Executive Committee Member	XXXXX, Title, Department
Additional Approver(s)	XXXXX, Title, Department
Reason Written	This revision is not on revision 5, 6 or 7

Revision 5	Date: 6/30/2022
Writer(s), Reviewer(s), Approver(s)	David Glockner, Kristopher Keys
Reason Written	Revised sections 3.1.3 and 3.4.2 to reflect the Audit and Risk Committee of the Exelon Board will receive reports

Revision 6	Date: 4/19/2024
Writer	Cheryl Crumpton, VP Deputy GC Chief Compliance & Ethics Officier
Reviewer / Approver	Dave Glockner, EVP, Compliance, Audit & Ethics

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Revision 6	Date: 4/19/2024
Reason Written	Revised section 2.3.1 to provide additional clarification about communications that are not considered “Requests”; revised section 3.1.1 to clarify that reports of Requests regarding employment may be made through Government Affairs or Compliance & Ethics; revised section 3.1.2 to add that the system for tracking Requests must track the disposition of each Request; revised section 3.4 to delete reference to defunct process document; revised section 3.2.2 to specify that Requests related to employment made in exchange for offering to perform, or as a reward for, an official act for the Company must be reported to either the Chief Compliance & Ethics Officer or General Counsel; revised section 3.2.4 to conform with current practice of requiring candidates to disclose both (i) whether the candidate is the spouse, domestic partner, child, sibling, parent, or parent/child/sibling-in-law of a current Public Official and (ii) whether, to the candidate’s knowledge, a Public Official has contacted the Company directly or indirectly to request that the candidate be hired; revised section 3.2.4 to eliminate provision requiring heightened scrutiny for hiring of family members of Public Officials for certain positions even if no Request is made; revised section 3.4.1 to reflect that the Chief Compliance & Ethics Officer reports on employment-related Requests to the Audit and Risk Committee of the Exelon board and the boards of each operating company quarterly, rather than bi-annually.

Revision 7	Date: 11/25/2025
Writer	Cheryl Crumpton, VP Deputy GC Chief Compliance & Ethics Officer
Reviewer(s)	Michelle Abrams-McPherson, Prin Enterprise Records Mgmt Program Mgr Cheryl Crumpton, VP Deputy GC Chief Compliance & Ethics Officer
Executive Administrator	Robert Matthews, Exelon
Executive Committee Member	Dave Glockner, EVP, Compliance, Audit & Ethics
Additional Approver(s)	N/A

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Revision 7	Date: 11/25/2025
Reason Written/Revised	Updated to new template; revision of Section 5.2.4.2 to accurately reflect the process for review and approval of candidate disclosures of relationships with Public Officials; revision of Section 5.3.1.2 to eliminate the requirement of CEO approval of Requests under this policy; other nonsubstantive edits for clarity and consistency

Revision 8	Date: 10/14/2026
Writer	Cheryl Crumpton, VP Deputy GC Chief Compliance & Ethics Officer
Reviewer(s)	Michelle Abrams-McPherson, Prin Enterprise Records Mgmt Program Mgr; Cheryl Crumpton, VP Deputy GC Chief Compliance & Ethics Officer; Leslie Garthwaite, Associate General Counsel
Executive Administrator	Robert Matthews, VP, Chief of Staff to CEO
Executive Committee Member	Colette Honorable, EVP, Chief Legal Officer, Compliance & Corporate Secretary
Reason Written/Revised	Reviewed and reissued without substantive changes

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