Vendors and Suppliers Affiliated with or Referred, Recommended, or Requested by Public Officials

Exelon Policy
LE-AC-POL8-003
Rev. 8

Effective:	10/14/2026
Supersedes:	N/A
Review Type:	1 Year
Core Function:	Compliance & Ethics

Table of Contents

1. Policy Statement 1
2. Policy Intent 2
3. Applicability 2
4. Terms and Definitions 2
5. Implementation 3
6. Reporting Potential Policy Violations; Non-Retaliation 5
7. References 6
8. Development History 6

1. Policy Statement

1.1. Exelon Corporation, along with its subsidiaries ("Exelon" or "the Company"), is committed to selecting qualified, reputable vendors and suppliers who share our commitment to integrity. At times, the Company may receive requests, recommendations, and referrals from external sources, including Public Officials, to contract with a particular vendor or source materials from a particular supplier. Public Officials may also have an ownership interest in or affiliation with vendors or suppliers that seek to do business with the Company. This policy sets forth the standards and requirements applicable to any request, recommendation, or referral from a Public Official – made directly or through an agent or intermediary – for Exelon or its subsidiaries to select a particular vendor or supplier, as well as the process to review vendors and suppliers owned or affiliated with Public Officials who seek to contract with Exelon or its subsidiaries. This policy does not address the selection of lobbyists and political consultants, which is addressed by Exelon's LE-AC-POL8-001, Interactions with Federal, State, and Local Public Officials Policy and LE-AC-PCD8-001, Due Diligence and Monitoring Procedure for Third Parties Engaged in Political Consulting and Lobbying Activities Procedure.

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

Vendors and Suppliers Affiliated with or Referred, Recommended, or Requested by Public Officials

Exelon Policy
LE-AC-POL8-003
Rev. 8

2. Policy Intent

2.1. This policy sets forth the following:

2.1.1 The requirements to centralize and track Requests from Public Officials, or their intermediaries or agents, that the Company contract with a particular vendor or source materials from a particular supplier;

2.1.2 The requirements to identify any vendor or supplier owned by or affiliated with a Public Official (referred to as a "Covered Vendor/Supplier"); and

2.1.3 The escalation, review, and approval requirements that apply to any vendor or supplier who is the subject of a Request and/or any Covered Vendor/Supplier.

3. Applicability

3.1. This policy governs all employees, officers, and directors of the Company, and applies to the hiring of vendors and suppliers by all business units. See SM-AC-POL1-001, Spending and Authorization to Contract with Suppliers Policy.

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, that the Company contract with a particular vendor or source materials from a particular supplier.

4.1.3 Covered Vendor/Supplier: Any vendor or supplier with an owner, beneficial owner (someone who has a 10% or greater financial interest in a vendor or supplier), director, officer, or Key Employee, who is either:

4.1.3.1 (a) a current or former Public Official (within the past two years); or

4.1.3.2 (b) the spouse, domestic partner, child, sibling, parent, or parent/child/sibling-in law of a current or former Public Official (within the past two years).

A publicly-traded company is not a Covered Vendor/Supplier for purposes of this policy unless a Key Employee involved in the vendor's relationship with the Company is a current or recent former Public Official as described above.

4.1.4 Key Employee: Any agent, representative, broker, or employee who will be compensated for or involved in conducting business with the Company.

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

5. Implementation

5.1. Reporting and Tracking Requests and Covered Vendors/Suppliers

5.1.1 Requests under this policy may come to the Company directly from Public Officials or indirectly by 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 of Requests 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 vendor(s) or supplier(s) that are the subject of the Request, and the disposition of the Request ("Tracking System").

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

5.1.4 A due diligence process will be maintained to identify whether a vendor or supplier is a Covered Vendor/Supplier. Covered Vendor/Suppliers will be tracked by Compliance & Ethics in the Tracking System.

5.2. Prohibited Conduct

5.2.1 Exelon is committed to making procurement decisions based on objective criteria, including the qualifications and reputation of the vendor and the needs of the business units. It is prohibited to select a vendor or supplier for the purpose of influencing a Public Official to take official action for the benefit of the Company, even if no Public Official has directly made a Request with respect to the vendor or supplier.

5.2.2 Consistent with Exelon's LE-AC-60, Anti-Bribery and Anti-Corruption Policy and LE-AC-POL8-001, Interactions with Federal, State, and Local Public Officials Policy, if a Public Official makes or appears to make a Request in exchange for offering to perform, or as a reward for, an official act for Exelon or any of its subsidiaries:

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

5.2.2.2 The vendor or supplier 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 to provide any goods or services to the Company.

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

5.2.3 The Exelon Chief Compliance & Ethics Officer, together with the operating company responsible for the procurement, shall ensure that a vendor or supplier subject to the prohibition in Section 5.2.2 of this policy is not hired by the Company and the decision is appropriately documented in the Tracking System and the responsible operating company's procurement due diligence documentation.

5.3. Consideration of Vendors and Suppliers Subject to Requests and Covered Vendors/Suppliers

5.3.1 Any vendor or supplier who is the subject of a Request, and not otherwise disqualified from consideration under Section 5.2 of this policy, and any Covered Vendor/Supplier may be considered for contracting and sourcing with the Company subject to the following requirements:

5.3.1.1 The vendor or supplier must meet the qualifications and requirements for the contracting and sourcing work, as determined by the operating company responsible for the procurement decision;

5.3.1.2 The vendor or supplier must go through the standard due diligence process administered by the operating company responsible for the procurement; all vendors and suppliers subject to review by Supply must be reviewed in accordance with the SM-AC-400, Materials and Services Procurement Procedure, including a competitive bidding process if applicable;

5.3.1.3 If the vendor or supplier is being awarded a single-source or sole-source contract, the justification for not competitively bidding the contract and required approvals must be documented and maintained. (For vendors or suppliers subject to review by Supply, that process is specified in the SM-AC-4011, Single Source Procedure)

5.3.1.4 Due diligence documentation for vendor selection including competitive bid evaluations and/or rationales for sole-source contracts, and information captured in the Tracking System, must be submitted to the following (1) the officer responsible for Government Affairs for the operating company; (2) the General Counsel for the operating company; and (3) Exelon's Chief Compliance & Ethics Officer.

5.3.2 Before selecting and contracting with a Covered Vendor/Supplier or a vendor or supplier subject to a Request, the reasons to support the selection must be documented in the Tracking System and final written approval must be obtained from each of the following: (1) the officer responsible for Government Affairs, for the operating company; (2) the General Counsel for the operating company; and (3) Exelon's Chief Compliance & Ethics Officer. The final determination regarding whether to award a contract to the vendor or supplier under consideration also shall be documented in the Tracking System.

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

5.3.3 All Covered Vendors/Suppliers who are contracted to provide goods or services to the Company are subject to ongoing monitoring during the time they provide goods or services to the Company. The monitoring will be performed by the Company department responsible for managing the relationship with the Covered Vendor/Supplier. The monitoring will comply with the requirements prescribed by the SM-AC-403, Contract Administration Procedure and include, but not be limited to the following:

5.3.3.1 Review of invoices to determine whether the invoices are consistent with contract terms and are supported with appropriate detail; and

5.3.3.2 Review of any proposed expansion of the goods or services to be provided by the Covered Vendor/Supplier.

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 operating company. 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. 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 possible concerns or ask questions about these policies, including through:

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

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

6.1.3 For additional information on how to report concerns, consult LE-AC-204, Reporting Potential Violations of the Code of Business Conduct and Supplier Code of Conduct Procedure.

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

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 and Supplier Code of Conduct Procedure. 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, intimation, 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. LE-AC-60, Anti-Bribery and Anti-Corruption Policy

7.2. LE-AC-204, Reporting Potential Violations of the Code of Business Conduct and Supplier Code of Conduct Procedure

7.3. LE-AC-PCD8-001, Due Diligence and Monitoring Procedure for Third Parties Engaged in Political Consulting and Lobbying Activities Procedure

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

7.5. SM-AC-400, Materials and Services Procurement Procedure

7.6. SM-AC-403, Contract Administration Procedure

7.7. SM-AC-4011, Single Source Procedure

7.8. SM-AC-POL1-001, Spending and Authorization to Contract with Suppliers Policy

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

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

Vendors and Suppliers Affiliated with or Referred, Recommended, or Requested by Public Officials

Exelon Policy
LE-AC-POL8-003
Rev. 8

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	Clarified monitoring of covered suppliers will follow the existing Contract Administration procedure; added Contract Administration procedure to list of cross-referenced Management Model documents

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 – no revision 4 on previous version	Date: MM/DD/YYYY
Reason Written	No revision 4 noted in previous development history

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 Officer
Reviewer / Approver	Dave Glockner, EVP, Compliance, Audit & Ethics

Confidential and Proprietary - © Exelon Corporation 2026

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

Vendors and Suppliers Affiliated with or Referred, Recommended, or Requested by Public Officials

Exelon Policy
LE-AC-POL8-003
Rev. 8

Revision 6	Date: 4/19/2024
Reason Written	Revised section 3.1.1 to specify that reports of Requests regarding vendors may be made through the business unit Government Affairs Team 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 3.2.2 to specify that Requests related to vendors 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 3.3.1 to eliminate the requirement that the business unit CEO review due diligence documentation for vendor selection if a vendor is subject to a Request; revised section 3.4.1 to reflect that the Chief Compliance & Ethics Officer reports on vendor-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: 12/17/2025
Writer	Alexandra Hider, Assistant General Counsel
Reviewer(s)	Michelle Abrams-McPherson, Prin Enterprise Records Mgmt Program Mgr Cheryl Crumpton, VP Deputy General Counsel Chief Compliance & Ethics Officer
Executive Administrator	Robert Matthews, Exelon
Executive Committee Member	Dave Glockner, EVP, Compliance, Audit & Ethics
Additional Approver(s)	N/A
Reason Written/Revised	Updated to new template, Section 7 precautions and limitations removed, 5.1.3 supply was removed, 5.1.2 was revised, no longer references SM-AC-POL1-001

Revision 8	Date: 10/14/2026
Writer	Alexandra Hider, Assistant General Counsel
Reviewer(s)	Michelle Abrams-McPherson, Prin Enterprise Records Mgmt Program Mgr Cheryl Crumpton, VP Deputy General Counsel Chief Compliance & Ethics Officer, Leslie Garthwaite, Associate General Counsel
Executive Administrator	Robert Matthews, VP, Chief of Staff to CEO

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM

Vendors and Suppliers Affiliated with or Referred, Recommended, or Requested by Public Officials

Exelon Policy
LE-AC-POL8-003
Rev. 8

Revision 8	**Date: 10/14/2026**
Executive Committee Member	Colette Honorable, EVP, Chief Legal Officer, Compliance & Corporate Secretary
Reason Written/Revised	Revised and reissued without substantive changes

Official versions of all controlled documents are on the Management Model website and subject to change at any time.
It is the user's responsibility to ensure the most current version is used. If printed, this document is no longer controlled/current, 10/15/2026 1:23 PM