



# Corporate Policy: Human Rights

## Policy Statement

Respect for human rights is a fundamental value of Exelon. We are committed to supporting, respecting, and protecting human rights in our relationships with our employees, suppliers, and business partners.

## Policy Intent

This Policy is guided by the United Nations Guiding Principles on Business and Human Rights.

Exelon's goal is to support, respect and protect human rights—both in our own business activities and in our business relationships with other parties. Exelon expects the same of its suppliers. This policy, combined with those referenced below that address human rights within their respective scopes, reflects our commitment to human rights and ongoing efforts to protect human rights through our operations.

### **Child Labor**

Exelon is committed to the abolition of child labor within its sphere of influence. To that end, Exelon, its employees, and its suppliers must prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

### **Forced Labor**

Exelon must not use, be knowingly complicit in, or knowingly benefit from the use of forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude and human trafficking.

Exelon also specifically requires that all members of a supplier's workforce understand the terms of their employment, and Exelon prohibits suppliers from withholding or destroying employee identity or immigration documents, passports or work permits.

### **Fair Compensation**

Exelon must compensate employees equitably and competitively relative to the industry and labor market and in accordance with the terms of applicable collective bargaining agreements. Exelon must comply with applicable minimum wage, wage payment, work hours, overtime and benefits laws.

### **Freedom of Association and Collective Bargaining**

The National Labor Relations Act (the “Act”) provides that employees, as defined by the Act, have the right to choose whether to form and join trade unions. Exelon, its employees, and its suppliers must ensure that the rights of eligible employees to choose whether to be a member of a trade union and to bargain collectively as permitted by the Act are not unlawfully interfered with or restricted.

Exelon must pursue constructive relationships and bargain in good faith with labor unions that represent employees.

### **Anti-Discrimination and Harassment**

Exelon is committed to a work environment free from discrimination, harassment, and retaliation, and to providing equal employment opportunities to all applicants and employees regardless of race, color, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability, or military status.

Exelon, its employees, and its suppliers strive to:

- Provide equal employment opportunities to all applicants and employees.
- Maintain workplaces free from harassment or discrimination toward employees, applicants for employment, customers, or any other individuals who visit or conduct business with Exelon or its suppliers.
- Provide reasonable accommodations to a qualified employee or applicant with a disability, to a pregnant employee or applicant, or to an employee or applicant for their sincerely held religious beliefs or practices, where the reasonable accommodation would enable the employee or applicant to perform the essential functions of their job or to have an equal opportunity to be considered for a job.

### **Diversity, Equity and Inclusion**

At Exelon, diversity, equity, and inclusion are fundamental values. Our commitment to human rights is reinforced by our diversity, equity, and inclusion practices because a diverse, equitable and inclusive culture values human rights and empowers our employees to protect human rights and report concerns.

Exelon endeavors to reflect the diversity of the communities we serve and to cultivate a workplace that provides each employee with respect and the opportunity to grow and contribute at their greatest potential. Through our diverse business empowerment initiatives, Exelon is focused on supporting and expanding equitable opportunities for minority, women, disabled, veteran/service-disabled veteran, and LGBTQ-owned business enterprises.

### **Safe and Healthy Workplace**

At Exelon, dedication to health and safety is a fundamental value; our efforts to ensure a healthy and safe workplace reinforce our commitment to human rights. Exelon, its employees, and its suppliers strive to:

- Operate all aspects of business in a manner that protects the safety and health of employees, contractors, customers, and the general public.
- Provide and use the resources needed to maintain safe and healthy workplaces.
- Identify and take reasonable measures to eliminate or mitigate potential workplace hazards.
- Provide safety information to all employees to educate, train, and protect them from workplace safety hazards.
- Ensure all employees are trained and empowered to stop work anytime that unsafe conditions or behaviors are observed until the job can be completed safely.
- Take action to prevent acts of violence, threats, and physical intimidation in the workplace.

## Implementation

Trust, transparency, and accountability support Exelon's commitment to human rights. Exelon and its employees must abide by Exelon's Code of Business Conduct, our foundation for making effective, ethical business decisions and for identifying situations that may raise legal and ethical issues. Exelon's suppliers must meet the expectations of Exelon's Supplier Code of Conduct and contract terms and conditions.

### Transparency and Governance

Exelon seeks to identify, manage, and prevent violations of this policy. Anyone can report a human rights concern through the options listed below:

- Management
- Leadership
- Human Resources
- The Compliance & Ethics Office (EthicsOffice2@Exeloncorp.com; 1-800-233-8442)
- EthicsPoint (<https://secure.ethicspoint.com/domain/media/en/gui/71992/index.html>)
- Legal Department
- Internal Audit
- The Exelon Security Operations Center (ESOC) at 1-800-550-6154

Exelon must take any report concerning human rights seriously, no matter how the report is received. Our procedures are designed to promptly review and resolve each issue, as well as routinely monitor and report as necessary.

Should we identify adverse human rights impacts resulting from our business activities, Exelon is committed to the mitigation or fair and equitable remediation of those adverse impacts. Exelon must also seek to promote access to remediation where we are linked to those adverse impacts through our relationships with third parties.

Effective human rights practices are contingent on employee awareness and execution. Exelon must conduct trainings and issue communications to build awareness of the

Company's values and business practices. Exelon employees are required on an annual basis to review and commit to following Exelon's Code of Business Conduct.

## Exelon Corporate Policy References

Many of Exelon's commitments to human rights as described in this policy are embedded into other relevant policies and statements, which are instrumental in managing our overall approach to human rights, including:

- Code of Business Conduct
- Supplier Code of Conduct
- Safety Policy
- Equal Employment Opportunities Policy
- Workplace Accommodations Policy
- Policy Against Discrimination, Harassment and Retaliation
- Policy Against Sexual Harassment
- Environment Policy
- Environmental, Health and Safety Audit Program
- Corporate Compliance Program
- Anti-Bribery and Anti-Corruption
- Reporting Potential Violations of the Code of Business Conduct
- Investigating and Resolving Alleged Violations of the Code of Business Conduct

## Applicability

Exelon corporate policies are expressions of our values and intentions. Exelon is also subject to extensive legal requirements and regulatory approvals, and all our actions in furtherance of this policy must be carried out in compliance with applicable law and regulatory approvals.