

Political & Public Engagement Policy

We engage in the political and public policy processes to advance and defend the interests of FirstEnergy and its stakeholders.

Policy Owner: VP, External Affairs

Policy Contact: Director, Legislative and Regulatory Policy & Administration

Purpose

FirstEnergy Corp. (“Company” or “FirstEnergy”) participates in the political and public policy processes in a manner that emphasizes transparency and integrity, supports the diverse communities in which we operate, reflects our Company’s core values, and fulfills our responsibilities to shareholders and other stakeholders. FirstEnergy is committed to compliance with our Code of Conduct and with the letter and spirit of all applicable laws and regulations.

Scope

FirstEnergy adopts this Political & Public Engagement Policy (the “Policy”) to promote principled engagement by the Company and its directors, officers, employees, and those acting on the Company’s behalf. Related topics, such as gift and business gratuities, are covered by other Company policies and practices. This Policy should be read in conjunction with the Company’s Corporate Political and Public Engagement Practice, as well as other Company policies and practices. FirstEnergy’s Board of Directors exercises oversight responsibility over the Company’s political activities, as described in greater detail in the Corporate Political and Public Engagement Practice. FirstEnergy’s Board of Directors may amend this Policy at any time.

Policy

1. Political Contributions and Spending

FirstEnergy or its non-partisan federal Political Action Committee (“FEPAC”) support political candidates, political organizations, and ballot measures in strict accordance with all applicable laws. FEPAC funds may be used only for lawful, proper, and ethical purposes. FEPAC support is never given in anticipation of, in recognition of, in return for an official act, refraining from an official act or in instances where there is an appearance of a gratuity, bribe, trade, or quid pro quo of any kind.

FirstEnergy generally does not make political contributions from its corporate treasury funds but reserves the right to do so where such contributions are lawful and appropriate. FirstEnergy will disclose publicly any expenditure of corporate funds on political activities in annual reports posted on the Company’s website.

The FEPAC enables our eligible employees, as defined by the Federal Election Commission (“FEC”), to pool their personal financial resources to support federal, state, and local political candidates and organizations. All FEPAC contributions are strictly voluntary and may not be

coerced or reimbursed in any way. Further, the Company respects an employee's decision to not contribute to a political campaign.

The FEPAC supports political candidates and organizations committed to free enterprise and good government, where permitted. FEPAC has a general preference of making political contributions to a candidate directly¹.

FEPAC will support a candidate when doing so is in the best interest of the Company and its stakeholders. Political candidates and organizations are evaluated for support based solely on the Company's interests and not those of any individual officer, director, employee, or agent.

Each political contribution or expenditure made by the Company or the FEPAC is subject to a thorough, regularly updated review process, as described in the Company's Corporate Political and Public Engagement Practice. All FEPAC contributions and expenditures are disclosed as required on the website of the FEC (www.fec.gov). All corporate political contributions and expenditures are publicly disclosed on the Company's website on a quarterly basis at https://firstenergycorp.com/investor/corporate_governance/responsibility/corporate_political_activity_policy.html and at https://firstenergycorp.com/investor/corporate_governance/responsibility.html.

FirstEnergy employees have also established a New Jersey state political committee called JCP&L PAC, which makes contributions as described in the Corporate Political and Public Engagement Practice.

2. Support of Trade Associations and Social Welfare Organizations

FirstEnergy participates in trade associations and other industry groups, which allow the Company to work collaboratively with industry peers to address key public policy issues. FirstEnergy pays dues to these groups and regularly reviews the Company's memberships to assess their alignment with the Company's values and priorities. The Company typically does not make additional, non-dues contributions to support trade and industry groups' political activities. FirstEnergy posts information regarding its support of trade and industry groups on the Company's website https://firstenergycorp.com/investor/corporate_governance/responsibility/corporate_political_activity_policy.html and at https://firstenergycorp.com/investor/corporate_governance/responsibility.html.

FirstEnergy may also donate to 501(c)(4) social welfare organizations under limited circumstances, subject to a thorough, regularly updated review process, as described in the Company's Corporate Political and Public Engagement Practice. FirstEnergy posts information regarding its support of 501(c)(4) social welfare organizations on the Company's website on a quarterly basis at https://firstenergycorp.com/investor/corporate_governance/responsibility.html.

3. Communicating with Government Officials

FirstEnergy endeavors to maintain a healthy and transparent relationship with governmental bodies by communicating its views and positions to elected officials and policymakers. Federal, state, and local laws highly regulate lobbying activity on behalf of Company interests. Employees may communicate with government officials only in accordance with the Company's Corporate Political and Public Engagement Practice. The Company will disclose contacts, preparations, and expenses related to interactions with public officials as prescribed by law. FirstEnergy and its registered lobbyists file regular reports with the U.S. Congress related to the Company's federal

¹ FirstEnergy has adopted the CPA-Wharton Zicklin Model Code of Conduct for Corporate Political Spending.

lobbying activity that are found here:

LD-1 & LD-2 Reports of Registrations and Quarterly Activity

[Search Registrations & Quarterly Activity Reports | Lobbying Disclosure \(senate.gov\)](#)

LD-203 Reports

[Search Lobbying Contributions Reports | Lobbying Disclosure \(senate.gov\)](#)

Reports associated with the Company's state- and local-level lobbying activities are publicly available on the applicable state agency's website.

4. Voluntary Personal Political Participation by Employees

FirstEnergy values its employees' personal right and responsibility to engage voluntarily in the political process. In doing so, Company employees must make clear that their personal activities are not on the Company's behalf, especially when communicating with colleagues, customers, and suppliers. Employees must not use work hours, coercive measures, or Company resources (e.g., facilities, staff, telephones, email accounts, computers, supplies, letterhead, logos) to further their personal political activities.

Employees may make personal political contributions and raise funds for candidates and organizations. The Company will not directly or indirectly reimburse employees' political contributions or expenses.

5. Key Roles & Responsibilities

The CEO and Board of Directors at FirstEnergy have oversight responsibility for FirstEnergy's political activities. For questions related to this Policy, please contact the VP of External Affairs or the Office of Ethics & Compliance at ethicsoffice@firstenergycorp.com.

References

- [FirstEnergy Corporate Political and Public Engagement Practice](#)
- [FirstEnergy Gifts and Business Courtesies Practice](#)

Approval

Reviewed By (Name of VP)	Date Reviewed
Mike Eckard	02/04/2022