



## Government Relations Policy

### Purpose

WEC Energy Group and its subsidiaries (collectively referred to as the "Company" or "WEC Energy Group") engage in legislative, regulatory and public policy issues at all levels of government that affect or involve the energy sector. In all interactions with public officials, WEC Energy Group is committed to conducting public affairs with integrity and in conformance with the WEC Energy Group Code of Business Conduct ("Code"), all WEC policies, and all applicable laws.

This Policy sets forth the standards and requirements that govern WEC Energy Group and its subsidiaries' interactions with public officials. The Policy applies to all employees, agents, assignees, and members of the Board of Directors of WEC Energy Group and prohibits all forms of corrupt activity involving public officials.

In conformance with the Code and consistent with applicable federal and state laws, this Policy:

- Describes the prohibitions or limitations on providing anything of value to public officials, whether directly or indirectly, in order to ensure compliance with WEC Energy Group policies and applicable law and to avoid any actual or potential appearance of impropriety.
- Sets forth the rules for handling requests, referrals or solicitations from public officials or their agents or intermediaries, on behalf of their constituents or others.
- Describes the registration and reporting requirements for internal lobbyists and the work of external lobbyists who are retained by the Company.
- Addresses the process for requesting and authorizing corporate political contributions and public reporting. Corporate political contributions are contributions provided by the corporation.

Contributions made as a result of decisions of the WEC Energy Group Political Action Committees are not directly covered by this policy. Contributions made to charitable non-profit organizations qualified under section 501(c)(3) of the Internal Revenue Code are also not directly covered by this policy.

### Terms and Definitions

Each jurisdiction may have different definitions or meanings for each of the terms below. It is important that you are aware of the federal, state or local requirements and seek legal advice from the [Compliance Officer](#) if you have any questions, and in all cases, prior to engaging in any regulated activity below.

"Public official" or "government official" as used in this Policy means any official, officer, or full-time, part-time, or employee of, or a candidate for, a federal, state, local or municipal government department or agency, legislature, judicial branch, or other governing body, whether elected, appointed, retained or otherwise employed.

"Anything of value" is broadly defined for purposes of this Policy and includes, but is not limited to:

- Cash, cash equivalents or other monetary payments
- Travel, gifts, meals and entertainment
- Anything for which the public official does not pay at least the fair market value
- Loans
- Discounts not offered to the general public
- Offers of employment

- Benefits for a family member or other person connected to a public official, such as, employment, appointments, promotions, internships, or consulting engagements
- Premium utility service not offered to the general public
- Payments to a charity or charities at the request of or providing benefit to a public official
- Anything defined as a thing of value under applicable local, state or federal law.

Anything of value does not include:

- Food or refreshments of minimal value provided during meetings hosted by the Company, provided such interaction and the value at issue comply with applicable gift bans, disclosure requirements and government ethics rules, which may vary by jurisdiction.<sup>1</sup>
- Requests from public officials to assist with routine items, such as, to assist constituents with customer service issues or to engage in routine public communications and advocacy.

“Lobbying activity” means any activities as defined by law in various jurisdictions as lobbying. Lobbying activity is generally defined as any communication with a public official or government official for the purpose of influencing their decision-making regarding legislation, rulemaking, ratemaking, government contracting, or any other official decision of a government body.<sup>2</sup>

“Internal lobbyist” means an employee of the Company who engages in lobbying activities on behalf of the Company.

“External lobbyist” means an individual or entity under contract with the Company to engage in lobbying activities on its behalf.

“Political consultant” means any person or entity under contract with the Company to provide political consulting services but who does not engage in lobbying activities.

## **Prohibited Conduct**

As stated in the WEC [Anti-Bribery and Corruption Policy](#), WEC Energy Group condemns and prohibits bribery and all forms of public and private corruption. You may not offer, promise, provide or give anything, directly or indirectly, tangible or intangible, to any public official if the purpose is to improperly influence their decision-making. In addition, you may not authorize or request that others, such as internal lobbyists, external lobbyists or political consultants, take any action to violate any WEC policy.

The term “anything of value” is intentionally broad to ensure careful consideration and scrutiny is given to interactions with public officials, such as, benefits conferred on others at the request of a public official. These interactions with public officials that may involve anything of value require careful scrutiny to ensure compliance with this Policy and applicable law. Examples of interactions that require careful scrutiny are: inviting public officials to a concert, sporting event or other entertainment; considering a public official’s recommendation that the Company employ, retain or otherwise engage for compensation an individual or entity; a public official’s request for honoraria for a speaking engagement; or any request by a public official or an intermediary of a public official to provide a benefit to any person or entity, including charitable donations or sponsorships and political contributions.

You may not provide anything of value to a public official without prior approval of the EVP of External Affairs, or their designee responsible for business unit government affairs, who will consult with the Compliance Officer upon receipt of any request for approval.

In addition to obtaining authorization as required herein, you must also immediately report the providing of anything of value to a public official to the EVP External Affairs, or their designee responsible for business unit government affairs, so that it may be reviewed and accurately recorded in the Company’s books and records in

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<sup>1</sup> Illinois has a daily cap of \$75 on the food and refreshments purchased for a governmental official, and such expenditures must be reported to the State of Illinois on a semi-monthly basis.

<sup>2</sup> Certain jurisdictions such as Illinois have expanded the scope of “lobbying” to capture not only direct communications with governmental officials but also the solicitation of non-governmental officials to communicate with governmental officials.

compliance with the Code, and be disclosed with the appropriate government agencies in accordance with federal, state or local requirements.

### **Public Official Requests**

You must immediately notify the EVP of External Affairs, or their designee responsible for business unit government affairs, of any request by a public official, or others acting on their behalf, for anything of value ("Request"). You may not approve or authorize such request without prior written approval of the EVP of External Affairs, or their designee, who will consult with the Compliance Officer upon receipt of any request for approval.

In any case in which the EVP of External Affairs is the individual seeking approval or providing anything of value, approval must come from – and reporting be provided to – the Compliance Officer.

A referral, request or recommendation from a public official to consider an individual for employment or promotion at the Company must comply with the Employee Selection Policy.

A referral, request or recommendation from a public official to consider or contract with a vendor or supplier must comply with the Corporate Procurement Policy.

### **Internal Lobbyists**

The Company may designate Internal Lobbyists, who must comply with all federal, state and local lobbying laws. If you have a question about whether your activities are considered lobbying activities, you must seek advice from the Compliance Officer. Any employee that engages in lobbying activities on behalf of the Company may have to register and report as a lobbyist. The following pre-approval and reporting requirements apply to all internal lobbyists:

- Employees must obtain prior written approval of the EVP External Affairs, or their designee responsible for business unit government affairs, prior to engaging in any lobbying activities on behalf of the Company;
- All employees acting as internal lobbyists must report to EVP of External Affairs, or their designee(s) responsible for business unit government affairs, in connection with all lobbying activities in which they engage.
- Employees must adhere to federal, state and municipal regulations related to the registration and disclosure of any lobbying activity. This must be coordinated through the EVP of External Affairs prior to engaging in any potential or actual lobbying activity.

### **External Lobbyists and Political Consultants**

The Compliance Officer - or their designee to the extent necessary to comply with federal, state or local laws ("compliance designee") – shall be responsible for approving the hiring of all external lobbyists and political consultants and overseeing the monitoring of these individuals to ensure compliance with applicable laws and other requirements. In addition, the Compliance Officer or compliance designee shall be responsible for overseeing the actions of the EVP of External Affairs set forth below.

All external lobbyists and political consultants must be approved by the EVP of External Affairs, or their designee responsible for business unit government affairs, prior to any request for approval by the Compliance Officer or compliance designee.

All external lobbyists and political consultants must have a written contract with the Company or the subsidiary for which it is providing services. It is prohibited for any external lobbyist or political consultant to subcontract any portion of their work for the Company to another party. The External Affairs department is responsible for ensuring that each external lobbyist or political consultant has a written agreement consistent with this Policy.

All individuals and entities acting as external lobbyist or political consultants must report to EVP of External Affairs, or their designee(s), in connection with all activities covered by their written agreement with the Company. The written agreement must contain a requirement that any external lobbyist or political consultant act in full compliance with applicable laws, including registration and disclosure to the regulating government body.

External Affairs is responsible for performing due diligence on all third parties that engage in lobbying activities on the Company's behalf and routinely monitoring the services provided. Due diligence and monitoring of services means the assessment on at least an annual basis of an individual's or entity's qualifications, integrity and ability to perform lobbying activities on behalf of the Company in compliance with this Policy and applicable laws.

### **Corporate Political Contributions**

WEC Energy Group and its subsidiaries shall comply with all applicable federal, state and municipal laws, rules and regulations in the making of political contributions or expenditures using corporate funds. In no case may an employee seek reimbursement from the Company for a political contribution.

WEC Energy Group may sponsor and support one or more political candidates or political action committees in accordance with applicable laws and regulations. WEC Energy Group may also sponsor a political conduit committees as authorized by federal, state or municipal law to enable employees to make contributions to candidates through a conduit or political action committee

WEC Energy Group and/or its subsidiaries may be members of certain trade associations that may use a portion of their membership dues for political activities. As trade organizations inform WEC Energy Group of the amounts associated with political activities, such information will be made publicly available, subject to reasonable de minimus limits. A list of trade associations or related groups to which WEC Energy Group belongs that engage in some form of political activities will be made publicly available on the Corporate Responsibility section of the Company website.

### **Authorization to Make Corporate Political Contributions**

Requests for contributions to an entity operating under Section 527 of the Internal Revenue Code or to a national political committee shall be submitted to the Compliance Officer. The request will be reviewed to confirm that the contribution complies with applicable election laws and regulations. The Compliance Officer will keep accurate records of such contributions and ensure that a report is published annually, including the name of the recipient.

### **Annual Publication of Political Contributions**

WEC Energy Group will publish links on the Corporate Responsibility section of the Company website to the regulating entities that provide up to date information on contributions. In addition, as noted above, if WEC Energy Group pays dues or makes other payments to trade associations and a portion of those payments are used by such associations for political activities, such information will be made publicly available subject to reasonable de minimus limits.

### **Annual Reporting and Review**

The Audit and Oversight Committee of the Board of Directors will review this Policy at least annually. External Affairs will be responsible for keeping and maintaining appropriate records of all activities covered by this Policy to ensure compliance and integrity in the Company's interactions with public officials. The EVP External Affairs shall provide quarterly reports to the Audit and Oversight Committee of the Board of Directors of government relations activities associated with public officials covered by this Policy, the Corporate Procurement Policy and the Employee Selection Policy.

Violation of this Policy may result in disciplinary action, up to and including discharge.

### **Related resources**

[Code of Business Conduct Policy](#)

[Anti-Bribery and Corruption Policy](#)

Corporate Approval Policy

Corporate Procurement Policy

Employee Selection Policy

Formerly known as – Corporate Political Contributions and Reporting Policy (updated 12/1/2021)

Last revised: 4/3/2024

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