

# **Dominion Energy Lobbying and Political Contributions Policy**

## **Overview**

This policy governs Dominion Energy's engagement in lobbying activities, including direct, indirect and grassroots lobbying; our participation in trade associations; and our political contributions.

As a company whose operations are subject to extensive regulation throughout its multi-state service territory, Dominion Energy actively participates in political processes at local, state and national levels. Our goal is to contribute to legislative and rule-making activities affecting our business consistent with our corporate values and strategies, and to educate and inform public officials of the practical effects of public policy decisions and objectives they consider. Always, our efforts carefully balance several primary, related goals: to create and preserve long-term shareholder value; to ensure safe, dependable, reliable and affordable energy supplies for our customers; and our corporate commitment to preserve and improve the natural environment.

We strive to conduct our business transparently, build public trust and form lasting and mutually beneficial relationships by engaging with public officials, regulators, community and business leaders, and environmental and safety agencies and advocates. In addition, we align our lobbying activities and trade association participation with our core business and our bedrock principles of environmental sustainability, energy reliability, customer affordability and shareholder value. Our investments in renewable energy, nuclear relicensing, energy efficiency and natural gas, as described in our annual Sustainability and Corporate Responsibility Report, Climate Report and various other publicly available materials, further detail these efforts.

To promote transparency of our political activity, we also publish the following information on our website, even when disclosure is not required by law or whether the information relates specifically to lobbying: (i) all contributions to 527 tax-exempt political organizations; (ii) contributions to certain 501(c)(4) tax-exempt organizations which appear they may utilize some funds for political purposes; (iii) for trade associations and other tax-exempt organizations to which we contribute \$50,000 or more, the portions of our payments attributable to lobbying; (iv) payments greater than \$50,000 in the aggregate to national 501(c)(3) tax-exempt organizations whose predominate purpose is to provide venues for the exchange of ideas on matters of public policy; and (v) political contributions by our state and federal political action committees.

## **Corporate Contributions**

Federal law generally places limits on a corporation's ability to participate in the political process. Therefore, we do not contribute corporate funds directly to federal, state or local political candidates, committees or parties, where prohibited. Our South Carolina, Utah, and Virginia state Political Action Committees (PAC) utilize corporate contributions to political candidates, parties and committees. All PAC contributions, including recipients and amounts, are disclosed, and reports are maintained on the company website.

Each state where we do business has different regulations governing political contributions. We participate in the political process in accordance with all state laws and regulations, and all corporate contributions are designed to comply with the applicable state laws and regulations. We use corporate funds to make contributions to 527 organizations (tax-exempt organizations that engage in political activities) and trade associations with the approval of the senior government affairs officer. Our contribution decisions are based on what is in the best interests of Dominion Energy and not based on the personal preferences of our executives.

## **Trade Associations**

Our participation in trade associations provides a forum for input on state and federal issues important to our corporate strategy and business operations. The associations we join represent a broad array of professional and industrial interests, primarily in the electric power and natural gas industries. Additionally, we are active members of some groups representing larger segments of businesses such as chambers of commerce, because we share their goals of promoting the economic health of the communities we serve. We endeavor to align our trade association participation with our core business and our bedrock principles of environmental sustainability, serving customers reliably, affordably, and equitably.

Dominion Energy regularly assesses the positions taken by all national trade associations in which it participates for their alignment with the company's core values. These goals guide our advocacy and collaboration through trade associations. Our involvement enables information sharing among subject matter experts with diverse perspectives, and even when the viewpoints of an association differ from the company's on certain topics, this exchange can lead to progress and improvement for all who participate. As Dominion Energy works to achieve climate goals including those that support the Paris Agreement to help limit global warming to 1.5 degrees Celsius compared to pre-industrial levels, collaboration and information sharing is critical to developing innovative approaches, technological improvements, and identifying opportunities that may exist across multiple industries or business sectors. Limiting collaboration to only those who share the same viewpoints can limit opportunities for success in achieving our climate and other goals.

If there is a misalignment with an organization's policies, the company engages constructively to work through differences. This includes coalitions within organizations with like-minded members. While participation provides the best opportunity to shape positions to better align with the company's values and business interests, there are circumstances when misalignment with our principles may be material enough that ending membership or participation is necessary. As an example, Dominion Energy ended its participation in the American Legislative Exchange Council many years ago and more recently left the Utility Air Regulatory Group.

Dominion Energy's participation in national trade associations is reviewed and approved by senior management. Trade association participation is based on alignment with corporate strategy on policy issues, and not necessarily a reflection of alignment or agreement with each goal or objective of a trade association. We review our membership in national trade associations and seek to avoid risks to our company's reputation that might result from participation in trade associations or endorsement of trade association policies or positions inconsistent with our

corporate values. When we participate with trade associations that share some, but not all, of our corporate goals and principles, we may pursue one or more of a variety of options to better align trade association positions with those of the company as circumstances dictate. Depending on their roles, trade associations may be subject to lobbyist registration and disclosure reporting obligations, with their reports made available to the public by the federal and state agencies overseeing lobbying activities.

Nothing in this policy precludes scrutiny of and discontinuation of any engagement or membership regardless of the amount of investment involved, that conflicts with the company's values.

### **Policy Exchange**

Dominion Energy annually discloses payments greater than \$50,000, in the aggregate, to national 501(c)(3) tax-exempt organizations whose predominate purpose is to provide venues for the exchange of ideas on matters of public policy.

### **Dominion Energy Political Action Committee**

We encourage our employees to be active members of their communities. Along with participation in civic, charitable, and volunteer activities, this includes participation in political processes. Any eligible employee or shareholder of Dominion Energy may make voluntary contributions to the Dominion Energy Political Action Committee (PAC). The PAC is directed by a board of employees, which approves all decisions regarding the PAC's political contributions. PAC contributions go directly to support political candidates at both the state and federal levels. As part of our commitment to transparency, all PAC contributions are publicly disclosed on the website of the Federal Election Commission and linked on the company website.

### **Employee Personal Lobbying**

We do not restrict our employees' right to engage in personal political participation, including their right to communicate with government officials with the intent to influence official actions. When an employee does communicate with government officials solely in the employee's personal capacity, the employee must refrain from any actions that give the impression that the employee is acting on Dominion Energy's behalf or that the opinions expressed by the employee represent the position of Dominion Energy.

### **Corporate Lobbying**

No employee may register or retain others to lobby on behalf of Dominion Energy without express authorization to undertake lobbying activities by the Senior Vice President Corporate Affairs officer or designee.

### **Coalitions and Grassroots Lobbying**

Dominion Energy participates in industry-related coalitions and collaborates with third-party groups at the federal, state, and local level to advance the public policy interests of the company. Such activities may include supporting entities that provide educational materials and public policy research, perform advocacy and outreach to a variety of constituencies, and other engagement of relevant stakeholders on issues of concern to the company. These activities are sometimes referred to as “grassroots” activities.

While Dominion Energy may not agree with every position taken by the organizations it supports, the decision whether to support an organization financially, or to partner with an entity on a public policy matter, is thoroughly considered and reviewed. Participation in such activities is evaluated and approved by senior management to ensure that the investment of company resources is aligned with our core values and compliance with the law, including applicable lobbying registration and disclosure laws.

### **Registration and Reporting**

We require employees to comply with all federal and state laws and regulations governing lobbying, including registration and disclosure of lobbying activities and expenditures. This includes, where applicable, direct lobbying, indirect lobbying, and grassroots lobbying.

To ensure compliance with laws governing disclosure of direct, indirect, and grassroots lobbying, all employees whose job responsibilities may include work related to lobbying activities must monitor and record their time devoted to such work, as well as related expenses. Employees whose job responsibilities include communications with government officials for the purpose of lobbying must receive periodic training and guidance regarding time recording and expenses.

In jurisdictions where applicable, Dominion Energy files regular reports disclosing lobbying activities and expenditures, including the subject matters on which Dominion Energy lobbies and expenditures relating to lobbying activities. In addition to filing these reports with relevant government agencies, we publish the reports on our publicly accessible website.

### **Lobbying Decision-Making Process**

No lobbyist may be engaged on behalf of Dominion Energy without the approval of the Senior Vice President Corporate Affairs officer or designee. The following guidelines govern the decision-making of Dominion Energy Corporate Affairs officers in planning lobbying activities, expenditures, and engagements.

- Lobbying activities, expenditures, and engagements must pursue the business strategies and goals of Dominion Energy, not the personal interests of individual officers or directors.
- Dominion Energy must not engage a lobbyist without confirming the lobbyist has the relevant expertise for Dominion Energy’s business strategies and goals for the engagement.

- The business strategies and goals of Dominion Energy for lobbying activities, expenditures, and engagements include:
  - the collective interest of key stakeholders, including Dominion Energy shareholders and customers; and
  - the promotion of sound and sustainable policies, legislation, and regulation.
- Dominion Energy Corporate Affairs officers must provide regular updates on lobbying activities, expenditures, and engagements on behalf of the company to the CEO or the President of the applicable subsidiary.

### **Board of Directors Oversight**

On an annual basis, the Senior Vice President Corporate Affairs Officer reports to the Audit Committee, comprised of independent directors on the Dominion Energy Board of Directors, on the company's political and lobbying activities, expenditures, and its governing policies. This includes payments to trade associations and other tax-exempt organizations that may be used for political purposes.

### **Enforcement**

If it is determined that an employee of Dominion Energy has violated this policy, such employee may be subject to disciplinary action, up to and including termination of employment.