

FIRSTENERGY POLITICAL & PUBLIC ENGAGEMENT POLICY

PURPOSE: FirstEnergy participates in the political and public policy processes in a manner that emphasizes transparency and integrity, supports the diverse communities in which it operates, reflects the Company's core values, and fulfills its responsibilities to regulators, shareholders and other stakeholders. FirstEnergy is committed to compliance with its Code of Conduct: *The Power of Integrity*, this Policy, and 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. This Policy should be read in conjunction with the Company's Gifts and Business Courtesies Practice, Corporate Political and Public Engagement Practice, and other Company Written Guidance. 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.

POLICY:

1. Political Contributions and Spending

FirstEnergy generally, does not make direct corporate political contributions from corporate treasury funds, but may do so where legally permissible.

FirstEnergy established a political action committee called FirstEnergy Corp. Political Action Committee (FEPAC) which may contribute to candidates for federal or state office using voluntary contributions from the Company's eligible employees, as defined by the Federal Election Commission (FEC). FEPAC funds may be used only for lawful, proper, and ethical purposes. FEPAC support is never given in anticipation of, in recognition of, or in return for an official act, the 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.

The FEPAC enables our eligible employees, as defined by the 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 not to contribute to the FEPAC.

The FEPAC supports political candidates and organizations committed to free enterprise and good government, where permitted. FEPAC generally makes political contributions to a candidate directly¹.

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

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 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 action committee called JCP&L PAC, which is a state-level political action committee duly registered with the New Jersey Election Law Enforcement Commission (NJELEC). The JCP&L PAC files periodic reports with the NJELEC that discloses its political contributions to candidates, political parties, and political committees.

Voluntary contributions may not be solicited at any FirstEnergy facility, including JCP&L facilities, or during business hours.

2. Support of Trade Associations and Social Welfare Organizations

FirstEnergy is a member of various trade associations that may participate in political or public policy processes. FirstEnergy may not always agree with the views of the trade associations with which it is affiliated; however, its involvement provides a variety of benefits, including but not limited to, working collaboratively with industry peers on legislation, regulation, or governmental policies potentially affecting FirstEnergy and its shareholders.

FirstEnergy will require each trade association that the Company supports to disclose the portion of FirstEnergy's dues or payments used for lobbying and/or election activity that is non-deductible under section 162(1)(B) of the Internal Revenue Code. FirstEnergy will publish that information on an annual basis for trade associations receiving \$25,000 or more during a calendar year on the Company's website: [FirstEnergy Corporate Responsibility Report - July 2025](#).

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 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, Employees must make clear that their personal political 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, etc.) 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' personal political contributions or expenses.

Employees should be familiar with the Company's Conflict of Interest Practice as it relates to personal political activity.

5. Key Roles & Responsibilities

The CEO, Governance, Corporate Responsibility and Political Oversight Committee and Board of Directors at FirstEnergy have oversight responsibility for FirstEnergy's political activities.

The Board of Directors reviews and approves an annual plan for political engagement, and the Governance, Corporate Responsibility and Political Oversight Committee and Board of Directors receive quarterly updates on that plan. The Board may amend this Policy at any time.