



## **POLITICAL CONTRIBUTIONS POLICY**

### **PURPOSE**

Ameren Corporation and its subsidiaries (hereinafter collectively referred to as “Ameren” or the “Company” or “Companies”) are affected by decisions of federal, state and local governments. Policy decisions of lawmakers and regulators at the federal, state, and local levels can significantly affect the business environment in which Ameren operates, especially because Ameren’s core utility businesses are highly regulated. When it deems it in its best interest, Ameren will be an active participant in the political and policymaking process, including contributing to political campaigns, engaging with policymakers regarding its views on issues, and developing and maintaining strong working relationships with officials whose decisions impact Ameren’s business. These political engagement activities support Ameren’s objective of providing safe, reliable and reasonably priced energy in an environmentally responsible fashion.<sup>1</sup>

The following sets forth Ameren’s policy for making corporate political contributions and lobbying payments and for disclosing such political contributions and lobbying payments to the public.

### **PERSONS AFFECTED**

This policy applies to all Ameren employees (full and part-time).

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<sup>1</sup> Additional details on Ameren’s public policy positions on various environmental matters and other policy positions can be found under the Environment and Sustainability tabs of [www.ameren.com](http://www.ameren.com).

## **POLICY**

This policy governs corporate political contributions and payments to trade associations that may be used for political purposes. Ameren has separate policies governing contributions made to any employee-sponsored political action committees or charitable non-profit organizations. Ameren's corporate political contributions shall be made for the benefit of the Company and will be made without regard to the personal political preferences of Company officers and executives, and shall comply with all applicable federal, state and local laws, rules and regulations. In addition, the Company shall not knowingly contribute to candidates whose views and actions are inconsistent with Ameren's corporate values. The Audit and Risk Committee of Ameren's Board of Directors shall review and oversee an annual audit of the Company's political contributions and payments to trade associations that use a portion of the dues for lobbying activity. The Ameren Corporation Board of Directors has approved this policy and the Nominating and Corporate Governance Committee of Ameren's Board of Directors will review it at least annually.

## **AUTHORIZATIONS TO MAKE POLITICAL CONTRIBUTIONS**

The Nominating and Corporate Governance Committee of the Ameren Corporation Board of Directors will annually provide an overall limit on the amount of political contributions to be made by Ameren Corporation and its subsidiary companies for the year. In addition, but subject to the foregoing overall limit, the Chairman, President and CEO of Ameren Corporation, and the President of each of the respective subsidiary companies are authorized ("Authorized Signatories"), in their discretion, to make or approve contributions and expenditures from their respective company funds for the purpose of supporting such state or local political groups (including, but not limited to,

political action committees, candidate campaign committees, political committees, 527 organizations,<sup>2</sup> ballot initiatives and political parties) which, in the judgment of the Authorized Signatories, and to the extent permitted by laws, rules and regulations, and in compliance with this policy, will promote the best interest of the Company and the communities it serves. Authorized Signatories shall, with the assistance of each of the respective companies' manager/director of government relations or similar authorized employee(s), approve a budget annually that identifies recipients of corporate funds. The Nominating and Corporate Governance Committee will conduct an annual review of political contributions and related expenditures paid by Ameren Corporation and its subsidiary companies and will review such contributions and related expenditures at regularly scheduled meetings throughout the year.

### **PUBLICATION OF POLITICAL CONTRIBUTIONS**

Ameren will post this policy on its website, [www.ameren.com](http://www.ameren.com). In addition, Ameren will semi-annually post on its website lists of corporate political contributions made in support of, or in opposition to, political candidates, parties, committees (including those that sponsor ballot initiatives)<sup>3</sup> and 527 groups such as governors' associations and, on an

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<sup>2</sup> 527 organizations (named after Internal Revenue Code section 527) are "political organizations" subject to Section 527 of the Internal Revenue Code of 1986, as amended. These include organizations established primarily for the purpose of influencing the outcome of elections of candidates for public office.

<sup>3</sup> The information provided on Ameren's website for Union Electric Company, d/b/a Ameren Missouri, and Ameren Illinois Company, d/b/a Ameren Illinois, will be the information that is reported by the recipient of Ameren funds consistent with state law requirements and disclosed on the respective state election campaign websites. This information, combined with all other posted information, reflects Ameren Corporation's and its affiliates' political contributions and expenditures for the relevant time period.

annual basis, the portion of dues or other payments to trade associations, including 501(c)(4) organizations,<sup>4</sup> that are used for lobbying activities. Ameren does not currently contribute to super PACs or make independent political expenditures in direct support of or opposition to political campaigns, but in the event that Ameren does so in the future, Ameren will semi-annually disclose such contributions and expenditures on its website (including, in each case, the recipient or beneficiary name and the amount given).

Ameren will make available and continuously maintain on its website an online archive of this information for each year that such contributions, payments or expenditures have been disclosed.<sup>5</sup>

### **ENFORCEMENT**

If it is determined that an Ameren employee has engaged in a violation of this policy, such employee may be subject to disciplinary action, up to and including termination of employment.

### **CORPORATE RESPONSIBILITY**

For additional information, employees should contact Ameren's Vice President for Federal Legislative and Regulatory Affairs.

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<sup>4</sup> 501(c)(4) organizations are "social welfare organizations" that operate under Section 501(c)(4) of the Internal Revenue Code of 1986, as amended. Social welfare organizations must be operated exclusively to promote social welfare and may further their purposes through lobbying, including as their primary activity, or through engagement in certain political activities where such activities are not their primary activity.

<sup>5</sup> Archived lists of historical contributions made prior to 2015 are accessible from governmental websites as well. See <http://www.elections.state.il.us> and <http://www.mec.mo.gov>.