ONCOR PRINCIPLES, POLICIES AND PROCEDURES

Title:	**Anti-Bribery, Anti-Corruption, and Anti-Money Laundering**
Responsible Officer:	**General Counsel**
Last Reviewed/Revised Date	**August 8, 2025**

Introduction

This Anti-Bribery, Anti-Corruption, and Anti-Money Laundering Policy ("the Policy") governs Oncor Electric Delivery Holdings Company LLC and all of its subsidiaries, including Oncor Electric Delivery Company LLC (collectively, "Oncor" or "Company").

Purpose

Oncor is committed to conducting its business ethically and in accordance with the highest standards. This Anti-Bribery, Anti-Corruption, and Anti-Money Laundering Policy makes clear that bribery, corruption, and money laundering in connection with our business, in all forms, are unacceptable. We strongly oppose the use of bribery, improper payments, fraud, or unethical practices to secure any business advantage.

Specifically, it is Oncor's policy that all applicable anti-corruption laws, including but not limited to 18 U.S. Code § 201, which prohibits the bribery of U.S. government officials, the U.S. Foreign Corrupt Practices Act of 1977, as amended (the "FCPA"), which prohibits bribery of non-U.S. government officials, the U.S. Foreign Extortion Act of 2024, as amended (the "FEPA") and other applicable legislation of any country related to domestic or foreign corruption, money laundering, support for terrorism, or commercial bribery (collectively, the "Anti-Corruption Laws") be complied with at all times in connection with its work.

The purpose of this Policy is to provide general principles and methods for complying with the applicable Anti-Corruption Laws.

Scope

This Policy applies to all of the Company's officers, members of the board of directors, employees, contractors, suppliers, consultants, and agents representing the Company and any Company business units ("Personnel"). All Personnel, both domestic and foreign, when acting on behalf of the Company or any of its subsidiaries and affiliates, are required to comply with this Policy no matter where in the world they are performing work and must seek guidance from Oncor Compliance, Treasury, and/or Legal with respect to any questions regarding this Policy and/or compliance with this Policy.

Responsibilities

It is the duty and obligation of all persons subject to this Policy to comply with this Policy and to promptly report any known or suspected violations of this Policy, as well as any illegal, improper, or unethical conduct. It is the Company's policy that no one reporting an actual or suspected violation of the law or this Policy in good faith will be subjected to any retaliation or adverse employment action because of their report.

If you become aware of a possible violation of this Policy, you must notify one of the contacts listed above or report such violation to Oncor's Ethics and Compliance Helpline (available 24 hours a day, 7 days a week and accessed toll-free at 877.776.1003 or via the web at https://oncor.alertline.com).

Officers and employees who fail to report any known or suspected violations of this Policy and/or violate this Policy may be subject to disciplinary action, up to and including termination of employment. Oncor may also terminate, for cause, any contract with an agent, consultant, supplier, subcontractor, or other third-party whose actions are subject to this Policy and who engages in conduct that is prohibited by this Policy.

It is also the responsibility of all persons subject to this Policy to cooperate fully, truthfully, and candidly with any inquiry conducted relating to this Policy. Failure to cooperate may result in discipline, up to and including termination of employment, or termination of any applicable contract.

Bribery is Prohibited

Oncor prohibits the use of bribery to obtain any improper business advantage, including to establish or maintain a business relationship. Bribery involves the direct or indirect giving of (or promise, offer, or agreement to give) anything of value (as defined below) to influence a third party. No one subject to this Policy shall promise, authorize, give, or offer, or agree to give or offer, anything of value, directly or indirectly, to a Government Official for the purpose of obtaining or retaining business or any undue improper advantage for the Company. This prohibition includes any attempts to influence a Government Official's decision on an issue that will affect the Company, attempts to induce a Government Official to violate a legal duty for the Company's benefit, or attempts to secure any other improper advantage in exchange for anything of value.

As we are a U.S. company, the FCPA applies to both the Company and its Personnel anywhere in the world. The FCPA prohibits the Company and its Personnel from corruptly offering, promising, or providing anything of value to any non-U.S. Government Official in order to influence an act or decision that will assist the Company in obtaining or retaining business, directing business to anyone else, or securing an improper advantage. The use of Oncor funds or assets for an unlawful purpose is prohibited.

For purposes of this Policy:

> The term ***anything of value*** is broadly construed and includes but is not limited to cash, cash equivalents, in-kind services, donations, contributions, loans, gifts, entertainment, and political contributions.
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> A ***Government Official*** means any officer, employee, or person acting in an official or unofficial capacity for or on behalf of: a government, whether domestic or foreign, including federal, state, provincial, county, municipal, and similar officials; any department, agency, or instrumentality of any level of a domestic or non-U.S. government; an employee, official, or representative of a public international organization, such as the International Monetary Fund, the European Union, the World Bank, or other similar organizations; or any commercial enterprise owned, controlled, or operated by a government other than the United States

Facilitating Payments Prohibited

Payments made to Government Officials to speed up or secure routine and non-discretionary governmental action – such as processing visas or scheduling inspections by a Government Official – are sometimes referred to as "facilitating payments." These payments are not permitted under the laws of many nations, and Oncor does not permit anyone to provide facilitating payments on its behalf or in connection with its work.

The only instance in which such a payment may be made is to protect Company Personnel from an imminent and grave threat to his/her health or physical safety, and then only when no other reasonable alternative exists. In such an event, the circumstances of the payment, including the reason for the payment, its amount, and the identity of the recipient, must be accurately recorded and reported to Oncor's Chief Financial Officer before the payment has been made or as soon as practical thereafter.

Commercial Bribery is Prohibited

Certain federal and state laws in the U.S., and the laws of other countries, expressly prohibit so-called commercial bribery, which includes corruptly providing anything of value to a private person, such as an employee or representative of a commercial counterparty, in order to induce the recipient to perform improperly a relevant function or activity, or to reward the recipient for improperly performing a function or activity.

No one subject to this Policy may promise, authorize, give, or offer, or agree to give or offer, anything of value, directly or indirectly, to an employee, agent or intermediary of another company with the intent to improperly or unethically influence the recipient's actions or decision making.

Furthermore, no one subject to this Policy may accept an offer, payment, promise, or transfer directly or indirectly of anything of value to influence the recipient's action improperly or unethically in relation to the Company's affairs or business.

Commercial bribery does not include the provision of reasonable and proportionate hospitality and promotional or similar business expenses in accordance with this Policy and the Code of Conduct.

Providing, Gifts, Travel, Meals, and Entertainment

Providing gifts, travel, meals, and entertainment to third parties can raise ethical and legal risks. In all cases, no one subject to this Policy should ever make or promise to make, give, offer or authorize the offer, or transfer, directly or indirectly of anything of value (to obtain or retain business or to gain any improper advantage, or to make, authorize, or offer anything of value that might create the appearance of impropriety.

The provision of gifts and business courtesies (which include gifts, meals, drinks, food items (such as chocolates or fruit baskets), entertainment (such as sporting event or concert tickets), recreation (such as golf fees or spa services), raffles, honoraria, transportation, promotional items, or accommodations are subject to existing Company policies, including Oncor's Code of Conduct, 90-01 Employee Expense Reports policy, and Lobbying Expenditures, Gifts, Gratuities and Entertainment, and Other Matters Relating to Public Officials policy. Employees must obtain pre-clearance from Oncor Compliance and Legal prior to providing any gifts, travel, meals or entertainment to non-U.S. Government Officials to determine the reasonableness and legality of any such gifts, travel, meals, or entertainment.

Contracting Practices and Third-Party Management

For purposes of compliance with this Policy, the Company will perform appropriate risk-based due diligence (as determined by Oncor Compliance and Legal in consultation with the Company business unit) prior to engaging or retaining any agent, contractor, consultant, sponsor, or other third-party representative who will have the power to bind the Company or who may interact with any non-U.S. Government Officials on behalf of the Company ("Contracting Agent"). The Company will also perform appropriate risk-based due diligence prior to entering into any joint venture or consortium. In both cases, the Company will periodically refresh this diligence during the duration of the engagement or relationship. Oncor Compliance and Legal and the senior vice president over the Oncor business unit seeking to engage an Contracting Agent or enter into a joint venture or consortium must each pre-approve the engagement of such Contracting Agent, the entrance into such joint venture or consortium, and the legal terms of such engagement/joint venture/consortium, which legal terms must be set forth in a written agreement approved by Oncor Legal that prohibits illegal payments and grants Oncor the right to terminate in the event of counterparty non-compliance with the restriction on illegal payments.

Any Oncor investment in a business entity with non-U.S. operations or participation in any joint venture or consortium with non-U.S. operations shall be conditioned upon that entity implementing this Policy (or substantially similar requirements) and undertaking not to apply or use any funds or assets in any manner contrary to the Policy. Where Oncor does not control such an entity, Oncor will use reasonable, good faith efforts throughout its investment to cause any such entity to comply with the Anti-Corruption Laws. Oncor will take such steps as are reasonable under the circumstances to ensure that there is appropriate accounting for the entity's assets and that appropriate controls are in place to ensure that assets are not used in a manner inconsistent with the Policy.

Charitable Donations or Sponsorships

The Company believes in contributing to the communities in which it does business. When appropriate, the Company permits reasonable donations by or on behalf of the Company to charities or sponsorships of community or industry events as outlined in the Company's Contributions policy. In addition, any contribution or sponsorship by or on behalf of the Company to a non-U.S. organization must be pre-approved by Oncor Compliance and Legal.

Anti-Money Laundering

Money laundering is the process by which the financial proceeds of criminal activities are given the appearance of legitimacy, thereby concealing their nature, origin, location, source, or ownership, and enabling criminals to benefit from the proceeds of their crimes and illegally obtained money. Knowingly participating in, or being willfully blind to, money laundering is a crime, which could subject both the Company and Company Personnel to significant criminal penalties, including substantial fines and imprisonment.

In order to comply with currency transaction reporting requirements, unless the Chief Financial Officer's prior written approval is obtained, the Company prohibits the acceptance of physical currency for services provided by the Company at the Company's facilities or service centers, as well as the acceptance of any unusual or untraceable monetary instruments as payments for the Company's services, such as: bearer bonds; financial instruments drawn to the order of cash, bearer, or similar payees; money orders or other monetary instruments that do not bear the customer/payee name or payment account information; or gift certificates or other cash equivalents.

Company Personnel must comply with all applicable laws relating to money laundering, financial recordkeeping, and currency reporting, whether imposed by the U.S. or other jurisdictions in which the Company is operating, including Form 8300 notifications to the IRS within 15 days of the occurrence of a cash transaction (or multiple transactions within one year of the first payment) exceeding $10,000. Oncor Treasury shall be responsible for tracking the receipt of cash payments and completing any required reporting. Payments to and from the Company are also subject to applicable Company accounting and other policies, including the Company's 20-04 Payment Processing, 20-07 ACH Supplier-Vendor Payment Changes – Accounts Payable, 20-08 Treasury Electronic Funds Transfer, 20-12 Opening and Closing Bank Accounts, and 90-01 Employee Expense Reports policies.

No payment on behalf of Oncor shall be approved or made if there is an intent or reasonable expectation that any part of such payment is to be used in a manner contrary to law or this Policy. Oncor shall decline any transaction for which there is a reasonable basis to believe that the payment to Oncor is made with a similar intent.

Recordkeeping

The Company's policy is to make and keep books, records, and accounts that accurately and fairly reflect the transactions and dispositions of the Company's assets in reasonable detail. No undisclosed or unrecorded fund or asset may be established or maintained for any purpose. Personnel are prohibited from falsifying accounting records and must take all reasonable care to ensure that any information provided to auditors is accurate.

Training and Certifications

The Company may periodically identify Personnel likely to pose potential risk and seek to require training of such Personnel, as well as obtain from such Personnel a certification of compliance with all applicable laws, including the Anti-Corruption Laws.