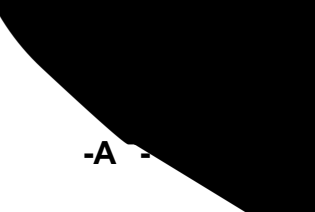
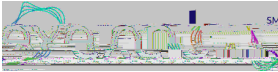


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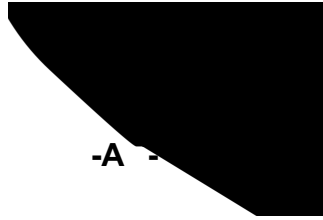
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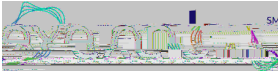


of public policy based on...; or (c) providing legal representation or advice

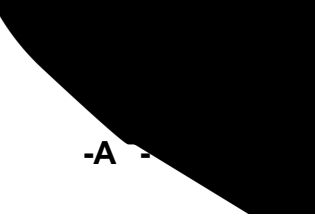
- 3. **A** ;
- 3.1. The proposed... applied to Co-ed Third Party
- 3.2. No individual... or individual... a Co-ed Third Party... Lobbying Activities... if has individual... a... Public Official.
- 3.3. The Company shall not engage a Co-ed Third Party... if... engagements would be inconsistent with the Company's commitment to conduct public affairs... and in conformance with the applicable... Code of Business Conduct and applicable law. In making this determination, the Company shall consider, among other factors:
 - 3.3.1. The qualification of the Co-ed Third Party ;
 - 3.3.2. Whether the Co-ed Third Party... an... associated with the Co-ed Third Party... the... spouse, domestic partner, child, sibling, parent, or parent/sibling-in-law of a... Public Official...:
 - 3.3.2.1. In the same governmental body, office, or agency... the... individual... engage in activities on behalf of the Company ; or
 - 3.3.2.2. See in a... position... has... influence over the Company ;
 - 3.3.3. The history and reputation of the Co-ed Third Party... and individual... associated with it ; and
 - 3.3.4. Whether the Co-ed Third Party... policies and procedures in place to ensure compliance with applicable law and ethical standards .

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4.1. Go e nmen Affai : /

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 Go e nmen Affai m clea l doc men he d e diligence ep aken
 a o each Co e ed Thi d Pa and ai e an a ning ign iden ified in
 he p oce o E elon Chief Compliance & E hic Office .

5.

5.1.

5.1.1. P io o he Compan engagemen o compen a ion of an Co e ed
 Thi d Pa and he eaf e on an ann al ba i , he head of Go e nmen
 Affai fo he ele an b ine ni m en e ha he ep e fo h
 belo a e comple ed and he Co e ed Thi d Pa i app o ed p an o
 Sec ion 5.1.3.1. belo .

5.1.1.1. Re ie he Co e ed Thi d Pa alifica ion o engage in ac i i e on
 behalf of he Compan . Among he fac o o be con ide ed a e he
 follo ing:

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Rep a ion of he Co e ed Thi d Pa , pa ic la l i h ega d o he
 fi m p incipal and he pecific p ofe ional e pec ed o pe fo m he
 o k;

The Co e ed Thi d Pa abili o a i i h he Compan ke
 a k eholde ;

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S b an i e bjec ma e e pe i e of he Co e ed Thi d Pa ;

Whe he he Co e ed Thi d Pa ha a p o en ack eco d of
 p o iding clien companie i h ad ice on i e and po i ion ;

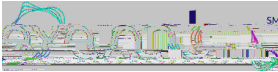
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Whe he he Co e ed Thi d Pa ill ake a p oac i e lobb ing
 app oach, ch a b inging oppo ni ie o E elon; and

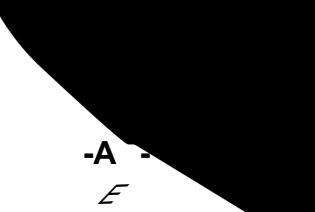
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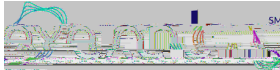
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 info ma ion de c ibing he ac i i ie , e ice pe fo med, o o he al e
 o he Compan o ppo pa men .

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 pa men of he in oice.

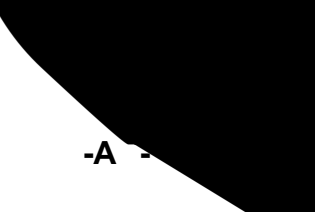
5.3.2.2. T ice-Yea l Pe fo rance Re ie :

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 e i ed in ec ion 5.3., he Go e nmen Affai

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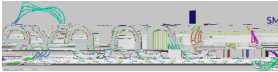
- o ac i i ie pe fo med b the Co e ed Thi d Pa d ing he e ie pe iod, incl ding de ail ega ding con ac be een Co e ed Thi d Pa pe onnel and p blic official , 6 ch a he indi id al in ol ed in ho e con ac and he con en of comm nica ion ;
- o he ali of e ice , ad ice, and e pe i e p o ided;
- o he he he ac i i ie a e commen a e i h he complea ion p o ided;
- o he Co e ed Thi d Pa compliance i h lobb ing egta ion , ce ifica ion , and aining; and
- o a e ie of an change in he Co e ed Thi d Pa alifica ion , incl ding an ma e ial change o pda e o info ma ion p o ided in e pon e o he

The Go e nmen Affai pe onnel con c ing he Pe fo mance Re ie hall p epa e a mma of info ma ionlea need ing he Pe fo mance Re ie and p o ide a b-ce ifica ion ha he Pe fo mance Re ie a comple ed o he b ine ni office e pon ible fo Go e nmen Affai . The b-ce ifica ion hall indica e he he con in ed engagemen of he Co e ed Thi d Pa i a an ed.

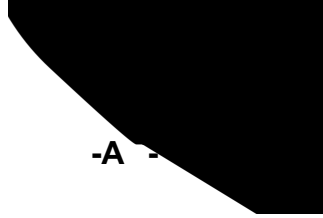
Fo he Pe fo mance Re ie o be comple ed no la e han J ne 15, he b ine ni le el office e pon ible fo Go e nmen Affai hall p o ide a ce ifica ion o E elon Chief Compliance & E hic Office ha Go e nmen Affai comple ed a Pe fo mance Re ie fo each Co e ed Thi d Pa p o iding e ice fo ha b ine ni and ha he b ine ni le el office e pon ible fo Go e nmen Affai ook an nece a ac ion ba ed on ha e ie .

Fo he Pe fo mance Re ie o be comple ed no la e han Decembe 15, he follo ing pe onnel ill be no ified of he comple ion of he pe fo mance e ie , p o ided a cop of E hibi 4 fo each Co e ed Thi d Pa and info med of he con in ed engagemen of Co e ed Thi d Pa ie : (1) he E elon office e pon ible fo Go e nmen Affai , b ine ni ; (2) Gene al Co n el, b ine ni ; and (3) Chief Compliance & E hic Office .

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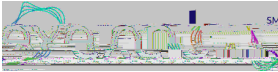
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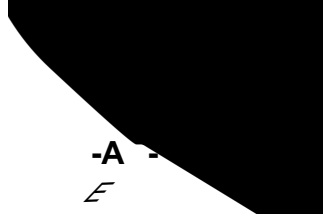
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For additional information on how to report concerns, you can contact
 the Election Policy Unit, LE-AC-204,

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7.2.

All reports will be treated confidentially unless they are in a public domain
 or otherwise made available to the public. This includes information from
 the Commission, or any other person, who has provided information to the
 Commission in confidence.

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The Commission will not take any action against an individual
 who, in good faith, has provided information about a potential violation of
 the Code of Business Conduct, or potential non-compliance with
 any other applicable law or regulation. Retaliation in any form, including
 intimidation, harassment, discrimination, or other forms of retaliation,
 is prohibited. Any person who engages in such conduct may be subject to
 disciplinary action, and may be liable for damages.

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8.1.

LE-AC-PCD8-001-1, Exhibit 1, Due Diligence Questionnaire for Lobbyists
 and Political Consultants

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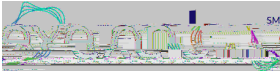
8.2.

LE-AC-PCD8-001-2, Exhibit 2, Appointment and Recommendation for
 Engagement of Lobbyist or Political Consultant

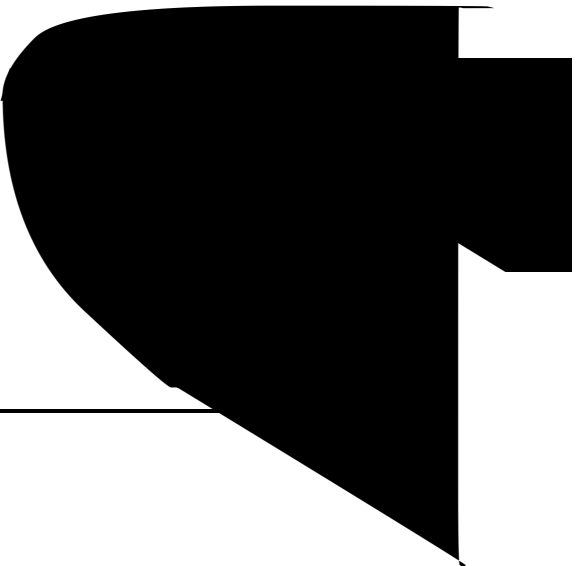
8.3.

LE-AC-PCD8-001-3, Exhibit 3,

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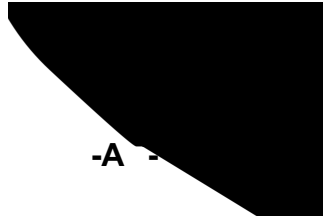
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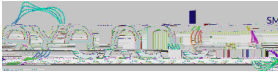
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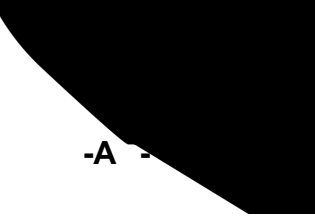


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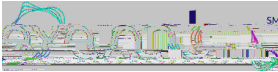
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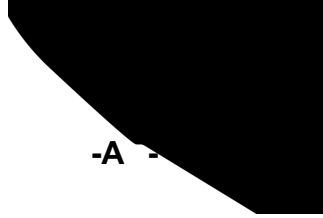
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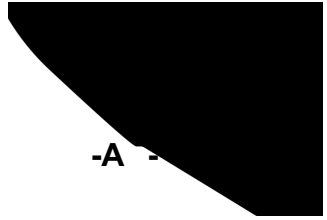


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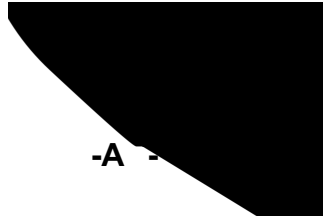
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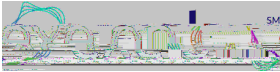
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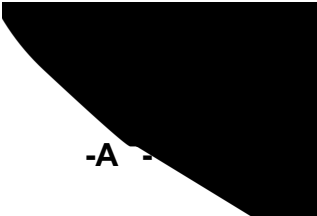


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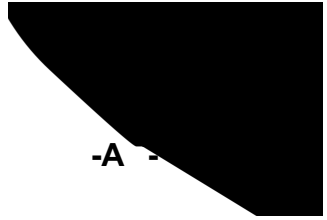
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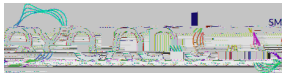
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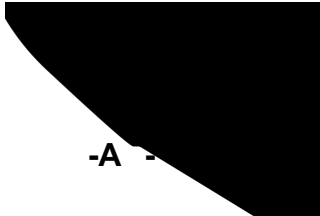


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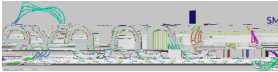
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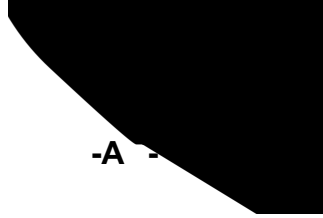
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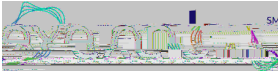
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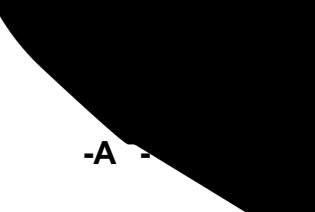
D,72569+B52L61K9137+3C+25641L524C+: KK;1L: H;5+37;F+93+: +2K5L1C1L+K63_5L9E+

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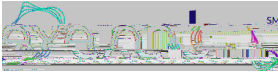
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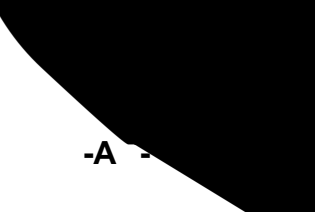
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