



Charitable Contributions Policy

Number:		Owner:	Ethics & Compliance
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Comments:			

Charitable Contributions Policy

1 PURPOSE

At AES, our company Values – Safety First, Highest Standards, and All Together – are more than just words on paper. They give meaning to who we are and how we work.

AES may choose to use funds or resources to enhance the social welfare and quality of life in the communities around the world where we work and do business. The purpose of this Policy is to ensure that all charitable contributions made by AES or on behalf of AES are consistent with the AES Code of Conduct, the AES Ethics and Compliance Program, and all applicable laws and regulations that govern such practices in the United States and internationally. As described more fully below, this policy does not affect personal contributions or donations made by AES people in their individual capacity.

2 SCOPE

This Policy applies to all AES people worldwide. In addition, temporary workers, contractors, consultants, agents, representatives and others who perform work on behalf of AES are required to ensure that their actions on behalf of AES meet the same high standards of integrity expected of AES people.

Some AES businesses have established guidelines which may also apply to the use of local AES funds or resources for charitable purposes. In addition to any applicable local guidelines, all charitable contributions must be reported and reviewed in advance in accordance with this Policy.

3 POLICY

Charitable contributions include anything of value provided to individuals or organizations that support charitable activities. All activities undertaken as part of AES social responsibility programs are considered charitable contributions.

Charitable contributions are not permitted in exchange for financial concessions, recommendations, favorable treatment, or other improper influence. Such contributions might violate United States laws, international treaties, or local laws, including anticorruption laws. Charitable contributions should not be made via cash or credit card.

All charitable contributions must comply with local and international laws and regulations, including relevant anti-corruption laws, and also must be consistent with the AES Ethics and Compliance Program.

All charitable contributions made by AES or on behalf of AES must be reported in advance to the Ethics and Compliance Department. Charitable contributions must not be made or promised until the Ethics and Compliance Department has provided confirmation to proceed.

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Proposals for charitable contributions must be supported by documentation that provides sufficient details to allow for review, including answers to the following questions:

- Who solicited the contribution or donation?
- Who is the contribution or donation being provided to?
- What legal requirements govern the contribution or donation?
- Is this a one-time expenditure or part of a series of contributions or donations?
- Will AES make the contribution or donation in cash, by check, or “in kind”?
- Will AES receive anything in return for the contribution or donation (for example, tickets to an event or recognition as a corporate sponsor)?
- Does the organization receiving the contribution involve a government official or individuals with authority over pending AES business?

You can obtain specific instructions and documentation requirements from the Ethics and Compliance Department.

What are some examples of charitable contributions?

Charitable contributions are most commonly monetary payments in the form of cash or checks. However, anything of value can qualify as a contribution or donation, including “in kind” contributions of goods or services. It is not possible to list every example of items of value that would be considered contributions or donations under United States and international laws, but the following are common examples:

- Gifts
- Loans, advances, endorsements, and guarantees
- Sponsorships
- Discounts
- Travel expenses
- Donated items, including AES resources (e.g., computers, office space, office supplies, construction equipment, and scrap materials)
- Donated services, including personal services provided during AES work hours or compensated by AES
- Purchase of fundraising items or fundraising event tickets

Are there charitable contributions that do not require Ethics and Compliance Department review?

There are a few common types of charitable contributions that do not require Ethics and Compliance Department review:

Personal contributions and donations

As described in the AES Code of Conduct, AES people are encouraged to participate as individuals in charitable activities. Personal charitable contributions made by AES people in

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their individual capacities as private citizens, outside of AES work time, and consisting solely of personal resources do not require review by the Ethics and Compliance Department.

To make clear that such personal contributions and donations are not being made on behalf of AES, AES people may not use AES's name, funds, facilities, work time, or other resources to support such activities. AES people also may not use their position as an AES person to request or pressure others to make contributions or donations.

Gift matching

AES people may choose to submit personal charitable contributions for inclusion in an AES gift matching program. Such contributions will be evaluated in accordance with applicable gift matching procedures and are not required to be reported to or reviewed by the Ethics and Compliance Department.

4 WHERE DO I GO FOR HELP OR ADVICE

If you have any questions about this Policy, please contact your manager, a member of the Ethics and Compliance Department, a member of the Corporate Affairs and Impact team, or the AES Helpline (www.aeshelpline.com).

Revision History

Date	Author	Change Description
December 2025	Ethics & Compliance	Policy separated from the political donations policy.