Supplier Code of Conduct

This Supplier Code of Conduct (Code) sets forth the principles and standards of conduct that PG&E expects suppliers, their employees, subcontractors and sub-suppliers to meet during the provision of goods and services to the Company. To support compliance with this Code, suppliers shall ensure that the Code is shared with all individuals assigned to perform work for or on behalf of PG&E, and that all PG&E-related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code.
A message from Gun Shim

TO ALL CONTRACTORS, CONSULTANTS, SUPPLIERS AND VENDORS

At PG&E Corporation and Pacific Gas and Electric Company (together, PG&E), we understand that a strong commitment to compliance and ethics is the foundation of a successful business. We strive to ensure that every business decision is guided by our commitment to operate with high ethical standards.

We are committed to ethical business conduct and compliance with applicable laws, regulations and policies, and we expect our contractors, consultants, suppliers and vendors (collectively, “suppliers”) to share this commitment.

This Code of Conduct sets forth the principles and standards of conduct that suppliers, as well as their employees, subcontractors and sub-suppliers must adhere to as they provide goods and services to PG&E.

Suppliers are responsible for ensuring:

1. This Code is shared with all individuals assigned to perform work for or on behalf of PG&E,
2. Any work performed for or on behalf of PG&E is done in full compliance with this Code, all applicable laws and regulations, and in accordance with the highest standards of ethical business conduct, and
3. Any work performed for or on behalf of PG&E is done by trained individuals with the skills, expertise and certifications necessary to complete the job in a safe and compliant manner.

PG&E may require suppliers to demonstrate they are in compliance with this Code of Conduct. Failure to comply with the expectations outlined in the Code of Conduct could result in termination of your assignment and/or contract.

Suppliers are to discuss any questions or concerns about compliance or ethics issues that arise while working for or on behalf of PG&E with their PG&E business contact. Suppliers may also call PG&E’s toll-free Compliance and Ethics Helpline at 888-231-2310 with questions on compliance or ethics issues, to report activities that they believe may be illegal or unethical or to raise concerns about questionable accounting or auditing matters. The Helpline is available 24 hours per day, 7 days per week, and suppliers may call anonymously.

We regard our supplier base as a critical and necessary extension of our mission, operations and future success, and we appreciate your commitment to making compliance and ethics a top priority as you work with PG&E.

Gun Shim

Vice President, Supply Chain
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STANDARDS OF CONDUCT

HEALTH & SAFETY

The safety of the public, employees and suppliers is PG&E’s highest priority. Working safely and in compliance with all applicable safety rules, laws, standards and procedures, including the California Occupational Safety and Health Administration (Cal/OSHA) rules and regulations (or local equivalent, if outside of California), with this Code of Conduct, and with any additional requirements from PG&E, is a condition of engagement as a supplier to PG&E.

Basic safety and health expectations and requirements are set forth below. Additional requirements specific to the work undertaken by a supplier may be specified in contractual language or by the supplier’s PG&E business contact.

- **Public Safety:** Supplier shall identify and eliminate all potential public safety hazards associated with any activity, service or product or equipment/tool deployed in the execution of a service for or on behalf of PG&E. Where hazards cannot be eliminated, they shall be controlled to within acceptable regulatory limits and recognized industry best practices. Appropriate public engagement, communication and access control shall be undertaken to ensure no hazard exposure nor harm to the public.

- **Occupational Safety:** Supplier shall identify workforce exposure to safety hazards via risk assessments and job safety analysis. Hazards shall be eliminated or controlled through proper design, engineering, procedural controls and ongoing safety training. Where hazards cannot be adequately controlled by these means, the workforce shall be provided with appropriate, well-maintained personal protective equipment (PPE). As critical partners in achieving zero workplace injuries, PG&E contractors and suppliers are encouraged to report near hits and are empowered and expected to stop the job if they observe work being performed in an unsafe manner by either a PG&E employee, PG&E contractor, or third party conducting PG&E-related work, or working around a PG&E facility.

- **Vehicle Safety:** Supplier shall ensure that all vehicles used and transportation activities undertaken in the execution of PG&E business are compliant with applicable Department of Transportation (DOT) and Department of Motor Vehicles (DMV) regulations and codes. When operating a vehicle for PG&E business, drivers shall carry a valid driver’s license, comply with the state vehicle code and operate their vehicle safely at all times, including minimizing all distractions while driving and obeying all posted road regulations.

- **Industrial Hygiene:** Occupational hygiene and medical surveillance methods shall be implemented by supplier for all applicable work activities to identify, eliminate and/or control workforce exposure to chemical, biological and physical agents and to provide ongoing monitoring and surveillance of affected personnel. Engineering or administrative controls shall be used to control overexposures. When hazards cannot be adequately controlled by such means, the health of the workforce shall be protected by appropriate personal protective equipment (PPE) and programs.
Report incidents, injuries and property damage to PG&E
All occupational injuries and illnesses, injuries to non-employees, damage to property resulting from PG&E business activities, and any unsafe conditions that cannot be safely corrected, are to immediately be reported to the supplier’s PG&E business contact, or by contacting the 24-hour PG&E Safety and Health Helpline at 415-973-8700.

Report or discuss safety concerns
To report or discuss a safety concern/issue, suppliers and contacts may also email contractorsafetyinfo@pge.com.

- **Emergency Preparedness:** Suppliers shall identify potential emergency situations and events associated with the work or location of the work to be carried out for or on behalf of PG&E and minimize potential impacts by implementing the following emergency plans and response procedures, where applicable: response equipment and PPE, emergency response reporting, workforce/public notification and evacuation procedures, emergency response training and drills, appropriate fire/emergency detection and suppression equipment, adequate exit or escape paths and recovery plans.

- **Fitness for Duty:** Suppliers shall have a process in place for determining if members of their workforce are safely able to perform the essential physical, psychological and cognitive requirements of their job without risk to self, others or the environment, and to ensure that they are not impaired by drugs, alcohol, disabling medical conditions or fatigue. Suppliers must also comply with any other fitness-for-duty regulations that apply to the work being carried out for or on behalf of PG&E, such as, but not limited to, those required by Cal/OSHA, the Nuclear Regulatory Commission or the Department of Transportation.

- **Use of Drugs and Alcohol:** The use, possession, purchase, sale, or the offer to sell, transfer, provide or share illegal drugs, or recreational and medical marijuana, during the execution of work for or on behalf of PG&E, or while on PG&E property, is prohibited, as is being in possession of, or under the influence of, medication prescribed for someone other than the prescribed patient. Suppliers are to inform their PG&E business contact if they suspect that any member of their workforce is taking prescription drugs, or over-the-counter medications, which could reasonably affect the ability to work safely or efficiently.

Similarly, work for or on behalf of PG&E must never be performed while under the influence of alcohol. Alcohol may not be consumed on PG&E property or while working on behalf of PG&E, including at meal times. Noncompliance with this requirement will result in the offending worker’s termination from a project and may result in termination of a supplier’s assignment with PG&E. [Exception: Officers and directors of PG&E may authorize, in advance, the consumption of alcohol for special occasions or for certain business meetings as long as such use is limited and does not violate other legal requirements, such as, but not limited to, those of the Nuclear Regulatory Commission or the Department of Transportation.] PG&E-owned, leased or rented vehicles may not be operated after consuming alcohol, even if consumption is permitted under the exception described above. Alcohol may not be transported in a PG&E-owned, leased or rented vehicle unless prior consent is obtained from the appropriate PG&E business contact.

In addition, to the extent it may be applicable to their contract terms, supplier shall comply with the U.S. Department of Transportation’s (DOT) regulations for (i) commercial motor vehicle drivers, 49 CFR 382, Controlled Substances, and Alcohol Use and Testing, and (ii) for work on gas, hazardous liquid and carbon dioxide pipelines, and liquefied natural gas pipelines, 49 CFR Parts 192, 193 or 195, Control of Drug Use in Natural Gas, Liquefied Natural Gas and Hazardous Pipeline Operations. Supplier shall establish and maintain a drug and alcohol testing program for its employees consistent with 49 CFR Part 40, Procedures for Transportation Workplace Drug Testing Programs and 49 CFR 199, Drug and Alcohol...
Testing, as applicable. Supplier shall ensure that any subcontractor hired by the supplier to perform any portion of the work under their contract that is regulated by 49 CFR 192, 193, 195 or 382 shall also have a drug and alcohol testing program that complies with applicable DOT requirements.

- **Weapons in the Workplace:** Unless explicit authorization to do so is formally obtained from PG&E’s Corporate Security Department, weapons shall not be brought onto, carried, stored or used on PG&E-owned, leased or rented property, or in a PG&E-owned, leased or rented vehicle, in a personal vehicle while on PG&E business, or at a job site, whether performing PG&E work or not. A “weapon” is a firearm, ammunition, explosive, or any other device or object that could be construed as a weapon. Weapons do not include tools that are used for legitimate business purposes.

- **Sanitation, Food and Housing:** Where applicable, members of supplier’s workforce shall be provided at a minimum, with ready access to clean toilet facilities, potable water, and to sanitary food preparation, storage and eating facilities. Where dormitories are provided by the supplier or a labor agent, these shall be maintained to be clean and safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

**ENVIRONMENTAL LEADERSHIP**

PG&E is committed to being an environmental leader and demonstrating this through its actions, including conducting its business in full compliance with the letter and spirit of all applicable environmental laws and regulations and operating in an environmentally sensitive manner consistent with its values and Environmental Policy. PG&E requires that suppliers operate in a similarly environmentally responsible manner, with management measures including the following:

- **Risk and Impact Identification and Management:** Supplier shall identify, inventory and characterize all emissions, releases, wastes and natural resource use occurring during the course of operations performed for or on behalf of PG&E. Processes shall be in place to identify, assess, mitigate and manage potentially significant contingent risks and impacts to human health and the environment.

- **Compliance with Environmental Legal Requirements:** Supplier must carry out operations in full compliance with the letter and spirit of all applicable environmental laws, regulations and standards. Supplier will also comply with any additional environmental requirements specific to the products or services being provided to PG&E as called for in design and product specifications and contract documents.

- **Pollution Prevention and Resource Preservation:** Supplier shall identify and implement opportunities to reduce or eliminate waste and pollution at its source and to continually improve resource and materials use efficiency.

**SUPPLIER DIVERSITY**

PG&E is a recognized Supplier Diversity leader and committed to providing maximum practical business opportunities to small, women, minority and service-disabled veteran and LGBT-owned business enterprises (diverse business enterprises or DBE). The Company expects its suppliers to strive for the same, including, but not limited to mentoring DBE subcontractors or business solution partners, sharing expertise, systems and tools with DBE subcontractors or business solution partners, seeking to integrate DBEs in different ways throughout their supply chain and seeking maximum DBE participation. By fully including DBEs in its supply chain PG&E
seeks to optimize innovation, provide better business solutions, promote community economic vitality and help to stimulate local job creation. The company does not use set-asides, preferences or quotas in administering our Supplier Diversity program.

LABOR ISSUES & HUMAN RIGHTS

PG&E expects its suppliers to know and uphold the human rights of all workers, whether temporary or contract employees, and to treat all their workforce members with dignity and respect, providing them with safe and humane working conditions. Expectations include the following:

- **Freely chosen employment**: Supplier shall not use or participate in the exploitation of workers, forced or involuntary labor, including human trafficking. All members of the workforce shall be free to leave the workplace or to terminate their employment at any time. No workforce member shall be required to surrender any government-issued identification, passports or work permits as a condition of employment. All fees charged to the workforce shall be disclosed upon request and excessive fees are unacceptable.

- **Child Labor**: Supplier shall not employ any person under the minimum legal age for employment as prescribed by the relevant local authority, or under the age for completing compulsory education, whichever is greatest. Legitimate workplace apprenticeship programs, which comply with all laws and regulations, are supported. Workforce members under the age of 18 shall not perform work that may expose them to hazards.

- **Wages and Benefits**: Wage payments and benefits must comply with all applicable laws and regulations. Supplier shall inform their workforce members of the basis on which they are paid via pay stubs or similar documentation and in a timely manner. Deductions from wages as a disciplinary measure shall not be permitted.

- **Working Hours**: Supplier shall not require their workforce to work beyond daily and weekly work hour limits as defined and required by local, state/provincial and federal/national law.

- **Harassment and Discrimination**: Supplier shall not tolerate any form of harassment or discrimination. This includes behavior, comments, jokes, slurs, email messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment such as bullying, initiation activities, or workplace hazing regardless of the other person’s willingness to participate. Suppliers are to comply with applicable local, state/provincial and federal/national legal requirements prohibiting conduct that could reasonably be construed as sexual in nature, or discrimination or harassment based on race, color, age, gender or gender identity, sex (which includes but is not limited to pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), sexual orientation, gender expression, transgender status, ethnicity, genetic information, physical or mental disability, pregnancy, religion, religious creed, political affiliation, medical condition, military and veteran status, protected veteran status ancestry, citizenship status, utilization of leaves of absence protected under state or federal law, union membership or marital status. These, or any other non-job-related factor, shall not be used as grounds for discrimination in hiring and employment practices, including advancement, disciplinary decisions, benefits, training or general workplace conduct.

- **Workplace Violence**: Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, or similar activities shall not be tolerated by supplier. Engaging in acts or threats of violence will result in termination of the offending worker and may result in termination of supplier’s assignment with PG&E.
• **Humane Treatment:** Supplier shall ensure that all members of the workforce are treated with respect and that no use is made of corporal punishment, threats of violence or other forms of physical coercion or harassment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

• **Freedom of Association:** The rights of the workforce to associate freely, join or not join labor unions, seek representation and join workers’ councils in accordance with local laws shall be respected and upheld by supplier.

• **Non-reprisal:** Supplier shall ensure that their workforce is able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

### ETHICAL BUSINESS CONDUCT

PG&E expects suppliers to conduct business in accordance with the highest ethical standards, including adherence to the following:

• **Business Integrity:** Supplier shall prohibit all forms of bribery, corruption, extortion, embezzlement, and money laundering.

• **Criminal and Civil Claims:** Supplier shall inform PG&E of any recent, current or pending criminal investigations or charges as well as any recent, current or pending civil litigation against it or any of its employees so that PG&E can assess its interests and the potential impacts of such investigations, claims, charges or litigation.

• **Company Records and Disclosures:** Accurate records and disclosures are critical to PG&E meeting its legal, financial, regulatory and management obligations. Supplier shall ensure that facts are never misstated or material information omitted to PG&E, and that all records, disclosures and communications to PG&E are full, fair, accurate, timely and understandable. The true nature of any transaction shall never be hidden, altered, falsified or disguised, nor any endorsements, approvals, or authorizing signatures for any payment forged. Records or disclosures known to be false or misleading shall not be submitted, entered, processed or approved and shall be reported to supplier’s PG&E business contact. [Refer also to Records Retention in the section on General Management and Administration].

• **Privacy and sensitive information:** PG&E retains the right to monitor its assets and work environment to determine compliance with applicable federal, state and local law. Supplier shall not expect privacy during use of a PG&E work space, computers, voicemail or systems that create, access, transmit or store information. Such information is accessible to PG&E even if it is password-protected, deleted by the user or in a locked area.

In addition, privacy and information security laws and regulatory requirements must be complied with when information and data about or from customers, consumers, employees or suppliers is collected, stored, processed, transmitted and shared. Applicable requirements can be identified by emailing a request for information to ThirdPartySecurityReview@pge.com.

• **Confidential Information and Intellectual Property:** Confidential and protected information is PG&E proprietary or third-party information intended for use within PG&E that, if disclosed to or modified by unauthorized individuals, could result in the risk of financial loss, productivity loss or damage to PG&E’s reputation.
Confidential and protected information includes legal documents, contracts, proposals, information about a specific employee or customer (including name, address, Social Security number, phone numbers, contact names and billing data), intellectual property and trade secrets (e.g., competitive strategy, trading, investment, costs, supplier name/contract/pricing information, finance methods).

Revealing confidential or protected information obtained while working for PG&E is a violation of this Code of Conduct, PG&E contractual requirements and potentially the law. Suppliers shall report any suspected data breach immediately following detection to the Technology Solution Center (TSC) at 415-973-9000.

Suppliers shall maintain and protect the confidentiality, integrity and availability of information entrusted to it by PG&E, except when disclosure is legally mandated or is authorized by PG&E’s Law Department or Enterprise Technology Risk Management (ETRM) Department. Applicable requirements can be identified by emailing a request for information to ThirdPartySecurityReview@pge.com. Other related requirements include ensuring the following:

- Confidential or protected information is not shared with PG&E affiliates that produce energy or energy-related products and services, and confidential or protected information is not used for personal gain or advantage, or copied or shared without appropriate approval. This obligation continues even after an assignment at PG&E ends.
- PG&E internal, confidential or restricted information is not stored on a device that is not PG&E owned.
- Documentation developed for PG&E is labeled “PG&E Confidential” in the footer of every document page.

- **Insider trading:** Material nonpublic information acquired during the scope of a contract with PG&E shall not be disclosed to make investment decisions concerning securities of PG&E or another company. “Material” means information that a reasonable investor would consider important in making an investment decision. The securities laws and PG&E’s Insider Trading Policy prohibit trading while in possession of material nonpublic information and prohibit sharing this information with others to enable them to trade.

- **Endorsements:** Subject to exceptions approved by PG&E’s Marketing and Communications, PG&E does not endorse products or services or the firms or individuals who supply them, and favoritism is not to be implied by testimonials or endorsements of PG&E’s use of any materials, supplies, equipment or service, or by the use of its name in advertising, publicity, articles, or catalogs. Affiliation with PG&E for the provision of a testimonial or event, product or service endorsement shall not be used by supplier without approval from an authorized PG&E employee.

- **No Improper Advantage or Influence:** Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. Behaviors or actions that may negatively influence, or appear to influence, supply management decisions shall be avoided, as are any improper reciprocal agreements.

- **Responsible Sourcing of Minerals:** Suppliers shall take reasonable steps to assure that the products they manufacture or contract to manufacture do not contain Conflict Minerals within the meaning of Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act.

- **Responsible Procurement:** Suppliers shall take reasonable steps to ensure that products and services procured are from ethical sources and that sub-suppliers are aware of and comply with the principles of conduct in this code of conduct.
CONFLICTS OF INTEREST

PG&E expects suppliers to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict with PG&E’s interests, the appearance a conflict of interest or that may compromise the exercise of independent judgment during the execution of work for or on behalf of PG&E. Specifically:

- **Conflicting business interests**: While engaged in PG&E-related work, supplier shall not accept any employment or engage in any activity that creates a conflict of interest, or the appearance of a conflict of interest, with PG&E or in any way compromises the work that supplier is contracted to perform on behalf of PG&E. A conflict of interest can arise if actions are taken or if there are interests that may make it difficult for supplier to perform PG&E-related work objectively and effectively. Examples include, but are not limited to, working with PG&E regulators, interveners, competitors or business performed for or on behalf of PG&E by another division within the supplier’s organization. Any potential conflicts shall be disclosed to supplier’s PG&E business contact and written concurrence obtained that states supplier is allowed to remain in a situation that could be perceived as a conflict. Any questions about a conflict of interest should be raised with supplier’s highest level PG&E business contact.

- **Close Personal Relationships**: Close personal relationships between supplier workforce members and PG&E employees responsible for monitoring supplier’s performance should be avoided in order not to compromise the exercise of independent judgment, or lead to claims of a conflict of interest or sexual harassment. To avoid these problems and to foster a positive work environment, supplier shall promptly report to their PG&E business contact any close personal relationships that result, or could result, in a conflict with this standard.

- **Gifts to PG&E Employees**: PG&E discourages suppliers from giving gifts to company employees, because accepting or giving a gift in a business setting can create a sense of obligation or the appearance of an obligation. A gift can be anything of value, including such items as an invitation or ticket to a sporting event or play, a non-business meal, a bottle of wine, a coffee cup, a free service, a special discount or an all-expense paid trip to a conference or trade show. Similarly, PG&E forbids its employees, as well as members of their immediate families, from accepting gifts from suppliers or similar business contacts doing business with or seeking to do business with PG&E, unless all six of the following conditions are met:
  - The value of the item or items during a 12-month period does not exceed $100.
  - The item is customary and does not create any appearance of impropriety.
  - The item imposes no sense of obligation on the receiver.
  - The item results in no special or favored treatment.
  - The item could not be considered extravagant, excessive or too frequently given.
  - The item is not concealed in any way.

Suppliers shall not give PG&E employees gratuities of cash, gift cards redeemable for cash or offer them loans or payments under terms that are not available to the general public.

“Customary business meals” are not considered gifts. These are routine meals, similar in cost to PG&E employees’ meals when they entertain clients.

- **Gifts to Foreign Officials**: United States companies and their employees and agents doing business outside the United States are required to comply with the provisions of the Foreign Corrupt Practices Act (FCPA). As such, no gift, money, entertainment, service or other item of value may be offered or given to a foreign official, inside or outside the United States, or the official’s friends or family members, in connection with work with PG&E. For purposes of the FCPA “foreign official” includes any officer,
employee, candidate, agent, representative, official or de facto official of any non-U.S. government, military, government-owned or affiliated company, or political party, or any public international organization. Even simple business courtesies such as meals, entertainment or travel may be illegal under the FCPA or the laws of the host country. When traveling, working and doing business in a foreign country or with a representative of a foreign country, supplier must maintain detailed records of transactions involving PG&E and any questions discussed with your PG&E business contact.

ENGAGEMENT WITH EXTERNAL PARTIES

- **News Media:** No supplier shall represent itself to the media as speaking on behalf of PG&E unless expressly authorized to do so by PG&E’s Corporate Affairs Department. Any media inquiries shall be immediately referred to PG&E Marketing and Communications at 415-973-5930. This team is available 24 hours a day, seven days a week to act as the direct representative and liaison for PG&E to the news media. If the media asks to speak with a PG&E subject matter expert, External Communications will determine how to respond on behalf of PG&E.

In the case of an emergency, reporters arriving on the scene may try to gather information from any available source. If forced by the situation to respond to reporters, no attempt should be made to improvise an answer, to speculate or to downplay the seriousness of the situation. All reporter inquiries must be directed to PG&E media relations personnel and, if they are not available, then to the 24-hour Marketing and Communications line (415-973-5930).

- **Public Officials:** In the ordinary course of business, suppliers may interact with government agencies and employees. However, interactions with government agencies, officials and employees are often regulated by campaign finance, lobby disclosure and government ethics laws. Before attempting to influence any election or government agency decision, or before hiring or making any payment to a public official or employee on behalf of PG&E, suppliers shall confer with Governmental Relations at GovRelCompliance@pge.com.
  
  o **Example 1:** Supplier must obtain a routine city or county permit before beginning work for PG&E and pay a fee to the appropriate local government agency. As long as supplier follows the standard procedure and does not offer any gift (including a cup of coffee), job, or payment to a public official or employee, supplier does not need to contact Governmental Relations.

  o **Example 2:** Supplier needs to rent space near a PG&E job and learns that a public official or employee who must approve the PG&E job owns the space supplier would like to rent. If Supplier plans to bill the rent to PG&E, Supplier must contact Governmental Relations before taking any further steps.

  o **Example 3:** Supplier has been asked to appear before a government agency hearing on behalf of PG&E. Supplier must contact Government Relations.

- **Communication restrictions for current/former government employees:** Supplier shall ensure that it understands and enforces post-government employment ethics requirements applicable to employees or contractors that were previously, or are concurrently, government employees or contractors. These requirements place restrictions on interactions and communications executed on behalf of PG&E or Supplier with government entities. Restrictions and requirements also apply to consultations on matters on which the current or former government employee is working or previously worked while in government.
• **Social Media:** Supplier shall have processes in place to ensure that the use of social media by their workforce or representing agents does not negatively affect PG&E’s reputation. Processes should specifically ensure against the following:

  o Representation of any content in any social media regarding PG&E without prior written approval of PG&E Marketing and Communications.
  o Posting content about PG&E staff or personnel, shareholders, customers, vendors, affiliates or competitors that is derogatory or in contravention of any standards in this Code of Conduct.
  o Making business commitments involving PG&E.
  o Posting photographs or video of non-public areas of PG&E’s premises, processes, operations or products without prior written PG&E approval.
  o Use of PG&E’s logo, trademark or proprietary graphics in a way that suggests representation of PG&E.

• **Customers:** PG&E is committed to ensuring that all its customers have a positive experience when working with company employees and suppliers. While working for or on behalf of PG&E, supplier must ensure that:

  o Clothing worn by workforce members is professional and appropriate to the type of work being performed.
  o All workforce members conduct themselves in a professional manner.
  o Customers and property owners are provided with accurate information.
  o Photo identification is carried at all times, with a willingness to show it to customers.

If unsure about the appropriate attire for the worksite or about the type of information to provide to a customer, supplier should discuss the matter with their PG&E business contact.

If a customer has additional or detailed questions about the work being performed, supplier should refer them to PG&E’s toll-free Customer Service phone number, **1-800-PGE-5000**, then update the relevant PG&E business contact.

**GENERAL MANAGEMENT & ADMINISTRATION**

• **Employment eligibility:** Supplier has a process in place to confirm the employment eligibility of its employees. Supplier also agrees to support any requests by PG&E to have background checks or employment eligibility of any of its employees conducting work for or on behalf of PG&E checked by a reputable third party.

• **PG&E Assets:** PG&E assets such as computers, telephones and cell phones, fax machines, copy machines, conference rooms, vehicles, construction equipment, tools and similar assets are for PG&E use only, unless explicit permission to use them has been secured in advance from the appropriate PG&E business contact.

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1 Social media activity includes:
- All types of posts and other communications on the Internet.
- Posts on social networking sites (such as Facebook, Twitter, Yammer, LinkedIn, etc.).
- Blogs and other online journals and diaries.
- Bulletin boards and chat rooms.
• **Computer and System Security:** Suppliers who have access to PG&E’s information systems are responsible for ensuring the security of those systems by identifying and complying with applicable PG&E information and cyber security policies and standards available from supplier’s PG&E business contact. Applicable requirements can be identified by emailing a request for information to ThirdPartySecurityReview@pge.com. Requirements include ensuring the following:
  
  o Computer accounts, passwords and other types of authorization are assigned to individual authorized users and must not be shared with or divulged to others. Authorized users will be held accountable for all actions taken on their system with their user identification.
  o Internet access is not used to conduct personal business, play computer games, gamble, conduct political campaigns or for personal gain.
  o Sexually suggestive or explicit material, gaming, file sharing or other inappropriate files or websites are not downloaded or accessed.
  o Inappropriate or pirated content is not stored on PG&E equipment.
  o Only approved, authorized and properly licensed software is used on PG&E computer systems.
  o Only PG&E-owned computers and equipment are used to connect to PG&E networks.
  o Personal devices are not recharged using a PG&E computer.
  o No attempts are made to circumvent or attack security controls on a computer system or network.
  o PG&E-issued equipment is protected from unauthorized access and theft at all times, including locking the computer screen when the computer or laptop is left unattended.
  o For those using mobile assets, applicable requirements from PG&E’s Mobile Computer & IT Asset Management Policies and Standards are identified and implemented. Applicable requirements can be identified by emailing a request for information to ThirdPartySecurityReview@pge.com.

Violations of any of the above will result in termination of supplier’s assignment with PG&E.

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<th>Report computer system or network security breaches:</th>
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<td>Any suspected or actual breach of PG&amp;E computer system or network security must be reported immediately to Information Security’s 24-hour emergency hotline at 415-973-2477, and assistance provided in the investigation as needed.</td>
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• **Network and premises access permission:** All PG&E non-employees (consultants, contractors, and agency workers) who require physical access to PG&E facilities on other than an incidental basis, or who require access to the PG&E computer network for purposes of performing services for PG&E, must obtain a PG&E contractor identity badge from PG&E Corporate Security and a LAN ID from the PG&E Technical Service Center (TSC) for PG&E to monitor activity on the PG&E network and premises.

Any non-employee who attempts to enter PG&E premises or attempts to remotely access PG&E computer networks without signing all appropriate PG&E access forms, including an approved non-disclosure agreement, and without PG&E’s written consent, is subject to immediate and permanent removal from all PG&E premises and from further employment on PG&E projects, and the agreement with the employer of such person shall be subject to immediate termination, in addition to all other legal remedies PG&E might have.
Every non-employee who has not obtained a PG&E badge from Corporate Security shall comply with all building entry protocols, including but not limited to registering at security desks, receiving visitors’ badges, or obtaining other temporary guest identification, as appropriate, before entering PG&E premises. Non-employees must visibly display their PG&E identity badge or guest badge/identification at all times while working on PG&E premises. Any non-employee who violates this security requirement shall be subject to immediate and permanent removal from all PG&E premises and from further employment on PG&E projects, and the agreement with the employer of such person shall be subject to immediate termination.

- **Business Continuity**: PG&E expects its suppliers to have business continuity plans in place, to test those plans and to exercise those plans for their business to operate on a continual basis with minimal interruption of supply in the event of an emergency, crisis situation, natural disaster or terrorist/security related event. Suppliers that support PG&E’s real-time operation and financial functions may be asked to provide copies of their plans, exercise and training records to PG&E.

- **Records Retention**: If supplier generates or receives information, data and/or records pertaining to PG&E as a result of the work performed by supplier, supplier must ensure those records are retained or transmitted back to PG&E in a manner that ensures PG&E information and data is safe, reliable, retrievable, available during its lifecycle, and compliant with PG&E’s requirements for third party production and retention of PG&E records. Applicable requirements can be identified by emailing a request for information to records_support@pge.com.

- **Management Systems**: Supplier shall support compliance with this Code of Conduct by establishing pertinent policies and processes appropriate for the nature and scale of operations, including the following: management commitment; accountability and responsibility; identification of legal and customer requirements; risk/issues assessment; risk/issues mitigation (procedural and physical controls); change management; emergency preparedness; training and competency; communications; monitoring, measuring and reporting performance; audits and assessments; incident reporting, investigation and corrective action process; target setting and continual improvement process.

**RAISING CONCERNS**

The standards of conduct described in this code of conduct are critical to the ongoing success of PG&E’s relationship with the company’s suppliers. If suppliers encounter questionable activities, PG&E encourages them to immediately bring them to the Company’s attention through supplier’s PG&E business contact or by contacting PG&E’s Compliance and Ethics Helpline at **888-231-2310**.

The Compliance and Ethics Helpline can also be used to report any concerns about questionable accounting or auditing matters or internal controls (collectively, “accounting complaints”).

The Helpline is available 24 hours a day, 7 days a week. It is a multilingual service that provides a safe place to ask compliance and ethics questions or to raise concerns. Helpline calls are handled confidentially to the extent permitted by law and can be submitted anonymously without fear of retaliation.

PG&E prohibits retaliation against anyone who raises concerns or is involved in an investigation and will investigate any reports of retaliation and take the appropriate action.

*This Code of Conduct is not a contract. It does not confer rights on any supplier, nor does it impose obligations on PG&E. In case of a conflict between the Code of Conduct and your contract, the terms of your contract prevail.*
Revision history:

Published:
  • December 2013

Updates:
  • July 2015 - Section on Public Officials added (page 11)
  • June 2016 – Section on communication restrictions for govt. employees added (page 11)
  • June 2017 – “Small” and “LGBT” added to section on Supplier Diversity (page 6)
  • July 2017 – Section on network and premises access permission added (page 13)
  • July 2018: General content update to align with applicable clauses in the updated PG&E Employee Code of Conduct.