

# Code of Ethics and Business Conduct



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Robert M. Blue  
Chair, President and CEO

**The Code is a living and constantly evolving example of our commitment to safety, ethical conduct, legal and regulatory compliance, innovation and teamwork.**

## A Message from Our Chair, President and CEO, Robert M. Blue

Sometimes, a company's mission and values are just words. At Dominion Energy, we live by our five core values: Safety, Ethics, Excellence, Embrace Change and One Dominion Energy—our term for teamwork. These values are at the heart of our company's culture and strategy, and they are the source of our tradition of excellence and success.

Each of us must be vigilant to protect the reputation we have worked so hard to earn. What we do is much more important than what we say, and knowing what to do in any given situation—no matter how awkward or unfamiliar—can be difficult. Making the wrong choice can have serious consequences in many ways, including everything from embarrassment and damage to our hard-earned reputation to endangerment of the life and safety of yourself, your colleagues and others. The world is filled with risk, but this Code of Ethics and Business Conduct will serve as a guide as you navigate those risks in your daily work and life.

I am personally asking you to join me in embracing and following this Code in your work and in your decisions and actions. The Code is a living and constantly evolving example of our commitment to safety, ethical conduct, legal and regulatory compliance, innovation and teamwork. You can use it as a guide of what to do in any number of situations, including business expenses and gifts, recordkeeping, conflicts of interest, political activities, social media use and much more.

Our multifaceted and gifted One Dominion Energy team is a consistent inspiration to me. Thank you for everything that you do on behalf of our organization and for joining me in my commitment to support and uphold our organization, our mission and our values.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Blue".

Robert M. Blue  
Chair, President and CEO

# Our Commitment to Our Mission and Values

## Mission

To provide the reliable, affordable, and increasingly clean energy that powers our customers every day.



## Values

### SAFETY

Our first and most important goal is to send every employee home safe and sound, every day.

### ETHICS

We do not take shortcuts when reaching for our goals and fulfilling our obligations. Our reputation depends on ethical behavior.

### EXCELLENCE

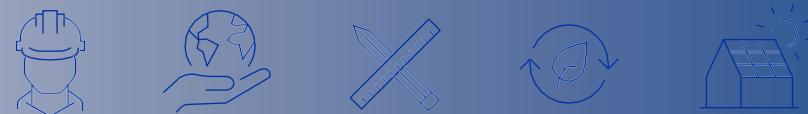
We work towards continuous improvement in all areas of our business.

### EMBRACE CHANGE

By welcoming new ideas, Dominion Energy champions innovation. Through innovation, we will continue to prosper in the years ahead.

### ONE DOMINION ENERGY

Our shared mission and purpose transcend organizational boundaries. Teamwork leads to strong, sustainable performance.





Morenike Miles  
Vice President and  
Chief Compliance Officer

**Understanding the Code of Ethics,  
and putting it into practice, is a  
part of your job as an employee of  
Dominion Energy.**

## A Message from our Vice President and Chief Compliance Officer, Morenike K. Miles

Safety, Ethics, Excellence, Embrace Change and One Dominion Energy. Holding fast to our core values every day, in every action we take, allows us to maintain the foundation of trust we have established with our customers, our regulators, our communities and our colleagues.

Please review the Code of Ethics and Business Conduct. Understanding the Code of Ethics, and putting it into practice, is a part of your job as an employee of Dominion Energy. As you go about your daily work, you may occasionally be confronted with a challenging ethical issue. When that happens, I encourage you to refer back to the Code for guidance. It is intended to provide a roadmap for identifying and resolving ethical questions, and it helps us manage our relationships with integrity and accountability.

In addition to the Code, the following ethics and compliance resources are available to all employees and contractors:

- Compliance Line by phone at 800-628-1798 or online at [www.dconcern.com](http://www.dconcern.com)
- Ethics and Compliance Program
- Email: [AskEthicsProgram@DominionEnergy.com](mailto:AskEthicsProgram@DominionEnergy.com)
- Human Resources or the Law Department
- Everbridge app

Each of us has a shared responsibility to report any potential violation of our Code. When we see something that does not look or feel quite right, we must have the courage to speak up – an action essential to each of our core values. All reports are taken seriously, and retaliation for any report made in good faith is never tolerated.

This is an exciting time to work for Dominion Energy. We are pursuing our vision to become the most sustainable energy company in America. To make the most of this enormous opportunity, we must continue to lead with integrity, good judgment and in adherence with our Code.

Thank you for the hard work you do every day to maintain an ethical and compliant culture at Dominion Energy.

Sincerely,

Morenike Miles  
Vice President and Chief Compliance Officer

# Our Commitment to Our Code of Ethics and Business Conduct



# Our Personal Responsibility for Ethics and Compliance

We hold one another and ourselves accountable to uphold the vision, mission and values of our company. Each of us has a responsibility to comply with the spirit and the letter of the laws, regulations, and company policies that apply to our work. We all share responsibility for maintaining the company's reputation, and this Code of Ethics and Business Conduct applies to each of us equally.

To preserve and protect our reputation for excellence, all employees, members of the company's board of directors and agents acting on the company's behalf are expected to conduct themselves and any company business in accordance with the highest level of ethical standards and this Code.

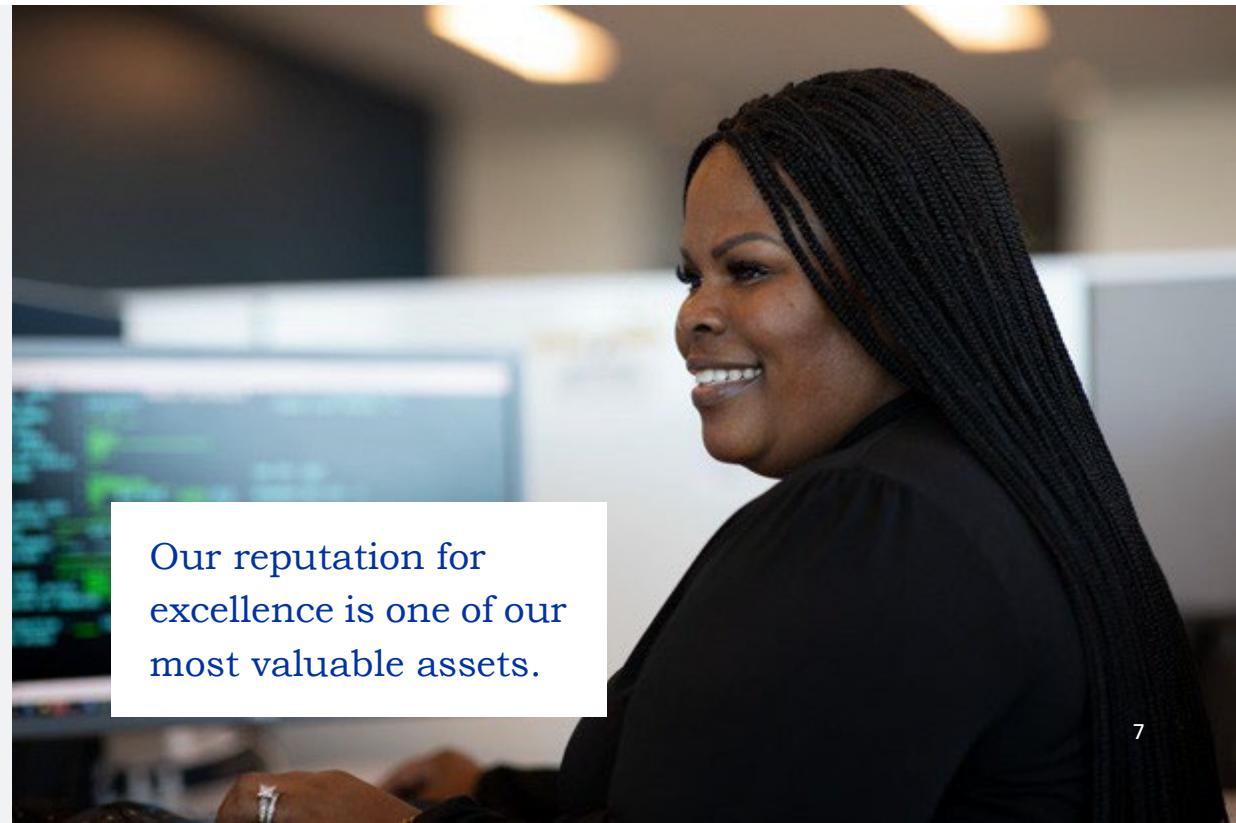
Our Code explains and promotes lawful and ethical behavior and is a resource for helping us implement our core values into our everyday decisions and actions. At Dominion Energy, our Code provides us with the knowledge and resources we need to do the right thing. Though the Code does not address every policy, regulation or law that may apply to a situation, it provides references to more detailed company policies and other resources to help us make decisions that are consistent with our values.

To learn more, visit the [Ethics and Compliance Program page](#).



## We live our Core Values because we:

- Understand and follow this Code and all laws and policies.
- Build and maintain a culture of respect, inclusion and integrity.
- Ask questions without fear of reprisal.
- Embrace and complete any training that is required of us.
- Immediately report any concerns we have about misconduct.



# Leading the Way: Special Responsibilities of Leaders

Those of us who are in leadership positions have special responsibilities to our colleagues and to Dominion Energy as a whole. We help develop the potential of all our colleagues by demonstrating supportive, ethical leadership every day.

The behavior and conduct of leaders set the tone for the workplace. Leaders that act with integrity, respect and professionalism foster a positive culture which benefits their teams and the company. Leaders have the additional responsibility to ensure their team members understand the rules and regulations applicable to their work, including the standards and expectations addressed in this Code.

Leaders are expected to be familiar with the content of this Code and understand the obligations for reporting compliance concerns. Employees often come to their leaders first when they have concerns. When leaders become aware of compliance concerns, it is their responsibility to ensure those concerns are reported to the appropriate department for review. When in doubt, leaders should err on the side of caution and report concerns to the Ethics and Compliance Program or Human Resources.



We live our Core Values because we:

- Demonstrate and encourage ethical behavior every day.
- Create an environment of open and respectful communication.
- Make sure those we lead complete all required training and have everything they need to do their jobs safely and appropriately.
- Report any actual or suspected unethical conduct or violations of law, rules, regulations or company policies.
- Protect those who report misconduct or compliance concerns in good faith from retaliation.



When it comes to acting with integrity, we never compromise.

## Ethical Decision-Making: Navigating Challenging Situations and Speaking Up

Ethical decision-making means acting in accordance with the law and the company's core values, even when business, commercial or other pressures could influence us to act in another way. Why is this so important?

- First, integrity. We strive to make decisions that reflect what we expect of ourselves and what others have grown to expect of us as a company.
- Second, good decisions mean good business. And doing good business has helped us build our company's reputation and stakeholders' trust. We work hard to keep that trust through making thoughtful and appropriate decisions about tough issues.

At times, the most appropriate action is not always clear to us. Doing the right thing is always critical, but it may not always be obvious what the "right thing" is. When that happens, we take the time to slow down and reflect before making a decision.

When the path forward is not clear, take one or more of the following steps until your concerns or questions are resolved:

- Review this Code and all relevant Dominion Energy policies.
- Talk to your leader or bring the matter to the attention of your Human Resources representative, the Law Department or the Ethics and Compliance Program.
- Contact the Compliance Line by phone at 800-628-1798, online at [www.dconcern.com](http://www.dconcern.com) or email [AskEthicsProgram@DominionEnergy.com](mailto:AskEthicsProgram@DominionEnergy.com).

Leaders are often the best people to go to for advice, as they are familiar with you, other members of your department and the work that you do. In some situations, however, one of the other resources listed above may be better suited to address your concerns or to provide guidance.



### For more information

[Speak-Up Policy](#)

# How to Speak Up

In the upper right corner of each page of this Code, you will find a Speak Up logo. By clicking on the logo, you will be able to access the following options for sharing ethics and compliance concerns:

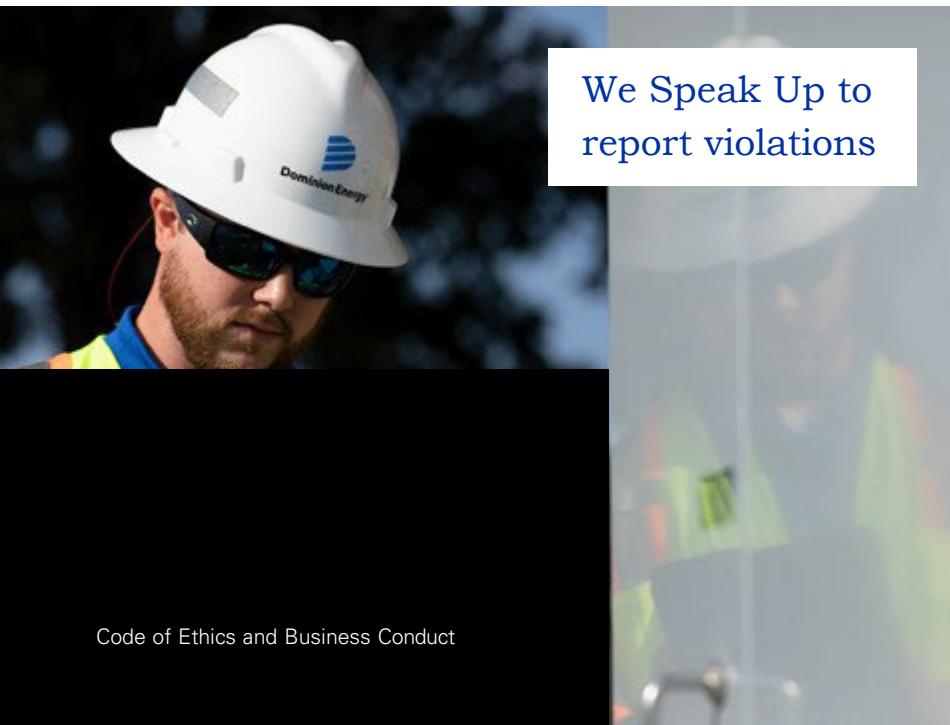
- Contact the Compliance Line by phone at 800-628-1798, online at [www.dconcern.com](http://www.dconcern.com) or email [AskEthicsProgram@DominionEnergy.com](mailto:AskEthicsProgram@DominionEnergy.com).
- Bring the matter to the attention of your Human Resources representative, the Law Department or the Ethics and Compliance Program.
- Use the Everbridge app.

Employees who report suspected misconduct or a compliance concern are expected to be truthful in their reporting. Making a false allegation knowingly is considered bad-faith reporting and is a violation of this Code.

## Protecting Our Team Members from Retaliation

Dominion Energy never tolerates direct or indirect reprisal, retaliation or discrimination against any team member who in good faith reports suspected unethical conduct or violations of laws, rules, regulations or company policies. Our zero-tolerance policy for retaliation also applies to those who cooperate and provide information in response to an internal compliance investigation. We consider retaliation a serious offense and will take appropriate corrective action.

Dominion Energy team members are also free to communicate with or provide information to any governmental agency or commission regarding possible legal violations without disclosure to the company as protected under applicable whistleblower laws without fear of retaliation.



## We live our Core Values because we:

- Protect the confidentiality or anonymity (if desired) of any team member who makes a report in good faith.
- Address concerns fairly, respectfully, and promptly.
- Never tolerate retaliation against any team member who in good faith reports suspected unethical conduct or violation of laws, rules, regulations or company policies.
- Protect anyone who is cooperating with an investigation or supporting another individual's concern against reprisal or retaliation.
- Cooperate fully and honestly with any investigation.



## What Happens When You Report a Concern?

If you become aware of suspected misconduct, illegal activities, fraud, misuse of company assets or violations of company policies, you bear a responsibility to report the concern in good faith immediately. It is important for you to know what happens when such a report is made.

Many issues can be addressed by speaking with a leader, a Human Resources representative or a representative of the Ethics and Compliance Program. If you are unsure where a concern should be directed or prefer to make the report anonymously, contact the Compliance Line by phone at 800-628-1798, online at [www.dconcern.com](http://www.dconcern.com) or email [AskEthicsProgram@DominionEnergy.com](mailto:AskEthicsProgram@DominionEnergy.com). Calls and reports to the website are never recorded or traced.

Reported concerns will be reviewed by the Ethics and Compliance Program to determine the appropriate course of action which may include an internal investigation.

Each report is issued a report identification number that can be used to call back or to access the Compliance Line website to check the status of the concern. Concerns that are reported anonymously are assigned a personal identification number (PIN) that can be used to access the report in the future.



### We live our Core Values because we:

- Honestly and truthfully report any concerns we have.
- Take seriously and thoroughly review every report as appropriate.
- Complete a detailed investigation of every report that is found to have merit.
- Maintain strict confidentiality throughout the investigation.

# Our Commitment to Safety



# Prioritizing Health and Safety in the Workplace

On our list of values, safety comes first because it is always our highest priority. We do our work in all types of places—offices, bucket trucks, power plants, near gas pipelines and other work locations. No matter where we are, we remain committed to establishing and maintaining a safe work environment and protecting the health and well-being of our team members.

Sharing that responsibility means that we must act quickly to resolve any unsafe or unhealthy conditions and maintain a safe work environment for employees, contractors, agents, customers and the general public.



## We live our Core Values because we:

- Understand and comply with all workplace health and safety laws and regulations.
- Know our company's safety rules, requirements and emergency procedures before we do our work.
- Immediately notify our supervisor or manager about any workplace injury to ourselves or our colleagues, including documentation of OSHA recordable accidents.
- Pay close attention to our work environment and are vigilant against any unsafe or unhealthy conditions or behaviors and immediately report any we suspect or find.
- Never tolerate any threats of violence or violent behavior in the workplace and seek out help to resolve any issues that may lead to violence.



## For more information

[Safety Policy](#)[Fitness for Duty Policy](#)[Violence in the Workplace Policy](#)

**Safety is our highest priority.**





## Fitness for Duty

One of the many ways the company ensures that we provide a safe and productive work environment is by requiring all employees to be fit for duty. If an issue arises regarding physical, emotional or mental health, we take the time to determine whether it is possible to work safely. If we have any concerns with our ability to work safely, we immediately report them to our leader, designated safety personnel or the Ethics and Compliance Program.

The company has the right to test team members for alcohol and drugs under certain conditions to determine their ability to perform their jobs. Employees may be subject to "for-cause" drug and alcohol testing, and some employee groups are subject to testing programs to comply with applicable regulations and laws.



### We live our Core Values because we:

- Report to work fit for duty and free of the effects of drugs and alcohol or medications that affect our ability to safely do our jobs.
- Report any actual or suspected on-the-job alcohol or drug use.
- Cooperate in all drug and alcohol screening testing programs required by regulations or company policy.
- Never use, consume, possess, purchase, sell, distribute or produce any illegal drugs on or off company property, during working hours, in a company vehicle, or while acting as the company's representative.



### For more information

[Fitness for Duty Policy](#)

# Our Commitment to Ethics



# Recognizing and Avoiding Conflicts of Interest

A conflict of interest is an instance when a personal or family interest interferes with or could be perceived to interfere with our ability to make sound, objective business decisions on behalf of the company. Conflicts of interest can arise in any situation where we let our personal or financial interests (or those of our family or close friends) divide our loyalties and influence the decisions or actions we make on behalf of the company. Even the appearance of a conflict of interest can harm our reputation for doing business ethically. We have a responsibility to always act in the best interests of the company and to avoid conflicts of interest when possible and to disclose those that cannot be avoided. Some examples of conflicts of interest include:

- Supervising or making employment decisions about a family member or someone with whom we have an intimate personal relationship.
- Accepting or offering gifts or entertainment from a supplier, customer or competitor that are prohibited by company policy.
- Having a second job that interferes with our ability to carry out our duties and responsibilities at the company.
- Working for or having a financial interest in a company that competes or does business with the company.
- Having a family or intimate personal relationship with an employee at a company that competes or does business with the company.
- Voting or ruling on an issue of interest to the company while holding public office.

Employees are expected to be transparent and promptly disclose any actual or potential conflicts of interest or appearance of a conflict of interest in accordance with company policy to the Ethics and Compliance Program.



A **family member** includes a spouse, domestic partner, parent, grandparent, child, grandchild, sibling, in-laws, aunt, uncle, niece, nephew, cousin, step-relatives or anyone else who resides in the same home as a team member.

An **intimate personal relationship** includes relationships of a romantic, intimate or sexual nature, or close, special personal friendships that may influence your decision-making and cause you to act other than in the best interests of the company.



## We live our Core Values because we:

- Act in the best interests of the company.
- Recognize and avoid any situations that have the potential to interfere with our ability to do our job or impair our objectivity.
- Remove ourselves from any decision-making process if there is a conflict of interest.



## For more information

[Conflicts of Interest Policy](#)

[Hiring and Assignment of Relatives Policy](#)

# Exchanging External Gifts and Entertainment Appropriately

The giving and receiving of gifts, entertainment, meals and other business courtesies can be important and appropriate ways of building and maintaining business relationships. In certain instances, however, such exchanges can create a conflict of interest or the appearance of a conflict of interest. We must never give or receive any gift or business courtesy that is intended to, or may appear to be intended to, influence a business decision. We should always consider whether public knowledge of a gift or business courtesy that we give or accept would harm the company's reputation.

Gifts valued at \$150 or less related to the maintenance of ongoing legitimate business relationships are permitted, but employees may not accept gifts from a single source that exceed \$250 in total value over the course of a calendar year. Examples of acceptable gifts or business courtesies include:

- promotional items;
- food or beverages during holiday seasons;
- occasional meals with business associates;
- tickets to ordinary sports and entertainment events;
- and supplier discounts that are available to all employees.

Meals and tickets to sports, theater and other entertainment events that exceed the monetary limit for gifts may be accepted provided there is a business relationship with the donor, the donor is present at the event or meal and the cost of the entertainment is reasonable under the circumstances, as determined by the Ethics and Compliance Program.



We do not accept offers for travel and overnight accommodations from a vendor that is doing business or seeking to do business with the company. In most cases the company will pay for travel and accommodation expenses associated with functions that involve travel or overnight stays whenever such functions have a business purpose. Any exception must be approved in advance by the Ethics and Compliance Program.



## We live our Core Values because we:

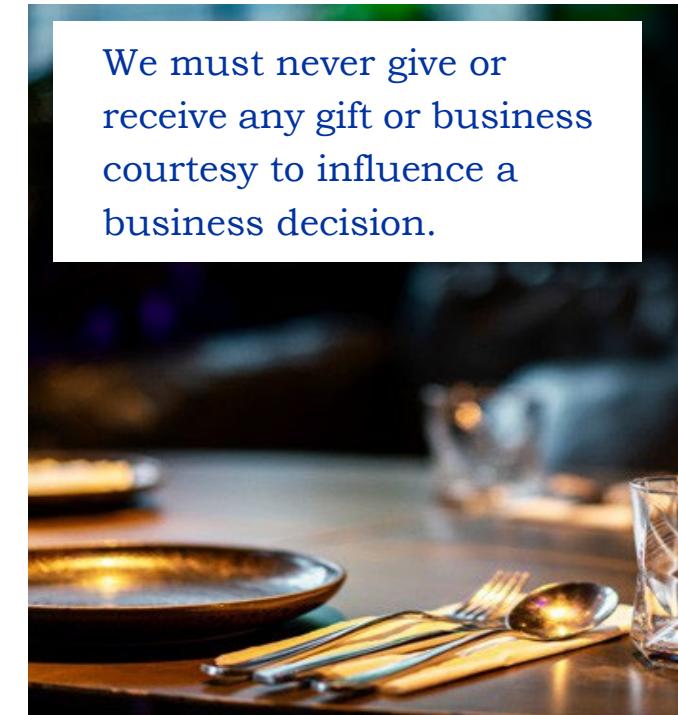
- Exchange gifts and entertainment responsibly and transparently to build business relationships and never to improperly influence a business decision.
- Give and receive only gifts, entertainment, meals and business courtesies that comply with our policies and never accept or give gifts in the form of cash or cash equivalents such as Visa gift cards or anything that could be illegal, sexually oriented, unsavory or otherwise in violation of the company's ethical standards. Gift cards to restaurants, retailers and entertainment venues are permitted provided they comply with the monetary limits for permissible gifts.
- Decline gifts or invitations from vendors if we are involved in a bidding or procurement process with them.



## For more information

[Conflicts of Interest Policy](#)

[Tax Treatment of Employee Gifts and Awards Policy](#)



We must never give or receive any gift or business courtesy to influence a business decision.

# Exchanging Internal Gifts and Entertainment Appropriately

The company may occasionally provide gifts or awards to employees. In most cases, these are considered taxable income under IRS rules - especially if the gift is cash, a gift card, or exceeds \$75.

## Always Taxable:

- Gifts over \$75, including branded items
- Safety awards (unless branded and under \$75)
- Cash, gift cards, gift certificates, or coupons of any amount

*Note: The company does not cover taxes ("gross up") on these gifts. Taxes are based on the full value of the gift.*

## Generally Non-Taxable (if infrequent and under \$75):

- Company-branded items or apparel
- Tickets to events (e.g., sports, theater, movies)
- Holiday or birthday gifts (non-cash)
- Department or company events (e.g., luncheons, Family Fun Days)
- Required work clothing not suitable for offsite wear
- Flowers or fruit for special circumstances (e.g., illness)
- Small personal items (e.g., backpack, polo, T-shirt)

For full details and examples, refer to the Tax Treatment of Employee Gifts and Awards policy.



## For more information

[Conflicts of Interest Policy](#)

[Tax Treatment of Employee Gifts and Awards Policy](#)

# Prioritizing Integrity and Trust

## Interacting with Government Officials and Employees in an Ethical Manner

In the course of our work, we sometimes interact with government officials, including representatives of the judicial, legislative or executive branches. Products and services paid for by a government entity are subject to complex laws and regulations designed to protect public funds. This means that we, along with our vendors, may need to meet special obligations when we do business with government customers. We always deal honestly and forthrightly with government officials and are mindful of ethical rules that address “revolving door” restrictions on hiring.

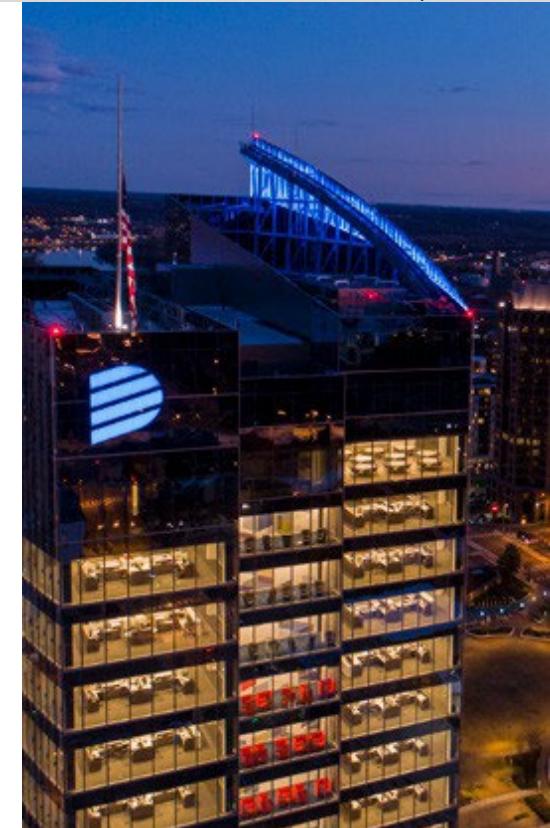
## Corporate Opportunities and Fair Dealing

Employees and members of the board of directors have a duty to advance the legitimate interests of the company and to deal fairly with our customers, vendors, suppliers, competitors and each other.

You should not accept business opportunities, commissions or advantageous financial arrangements from a customer, vendor or business partner. You also must not purchase for personal use goods or services provided by a company vendor on terms other than those available to the general public or established by company policy.

Never take personal advantage of any business or investment opportunity that you may learn about through your work for Dominion Energy and that the company may want to pursue — unless and until the company has had an opportunity to evaluate it and has chosen not to pursue it. You must not compete with the company.

You may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.



## We live our Core Values because we:

- Adhere to the highest ethical standards when interacting with government officials or employees.
- Comply with all government procurement laws, regulations, policies and processes.
- Know and follow all requirements and restrictions that apply to the exchange of meals, entertainment and other business courtesies between the company and a government official or employee.
- Never offer or give anything of value to a government employee to improperly influence a decision or to obtain an unfair advantage.



## For more information

[Conflicts of Interest Policy](#)

[Supplier Code of Ethics](#)

[Gifts to Government Officials Policy](#)



**I recently helped put together a proposal for a government contract, and we were elated when we learned that we won the contract. Shortly after we got the news, we learned that the two officials at the agency who decided to award the contract to Dominion Energy had both left their positions. I just found out that our new contacts at the government entity want us to hire the two decision makers who left their roles with the government as subcontractors on the job. Since they do not work for the government anymore, can we hire them on?**

**No.** Requiring the company to hire these former government employees on as subcontractors constitutes a demand for a bribe. This is unethical and will only lead to trouble. Report the situation immediately.



Bribery and corruption erode the trust we have earned.

## Prioritizing Integrity and Trust (continued)

### Bribery and Corruption

A **bribe** is anything of value, such as a payment, gift, favor or entertainment, given in order to obtain an improper advantage, such as influencing official action or obtaining business. We do not tolerate bribery or any other forms of corruption, as they damage communities, undermine the company's efforts to succeed through merit and erode the trust we have earned. Companies that pay bribes ultimately undermine their own long-term interests and the best interests of their investors.

We must comply with anti-corruption laws in the U.S. and any country where we do business, including the U.S. Foreign Corrupt Practices Act (FCPA). These laws prohibit paying, offering, accepting or receiving a bribe in any form, in both the public and private sectors. They also can make it a crime to bribe foreign officials for the purpose of influencing performance of their duties. We may not retain a third party to make such prohibited payments on our behalf. Some anti-corruption laws, such as the FCPA, also include accounting provisions that require us to maintain accurate books and records and a robust system of internal controls to prevent or detect such activities. Violation of the FCPA or other anti-corruption laws could result in fines, penalties or imprisonment.



### We live our Core Values because we:

- Comply with the U.S. FCPA and anti-corruption laws wherever we do business.
- Seek advice from the Law Department before negotiating, arranging or transacting a business opportunity with a non-U.S. government.
- Never accept or offer improper incentives, such as kickbacks or bribes, nor use agents or third parties to make improper payments or incentives that we cannot make ourselves.
- Ensure that company funds are never used for unlawful purposes.
- Promptly report any concern about a potentially improper payment.



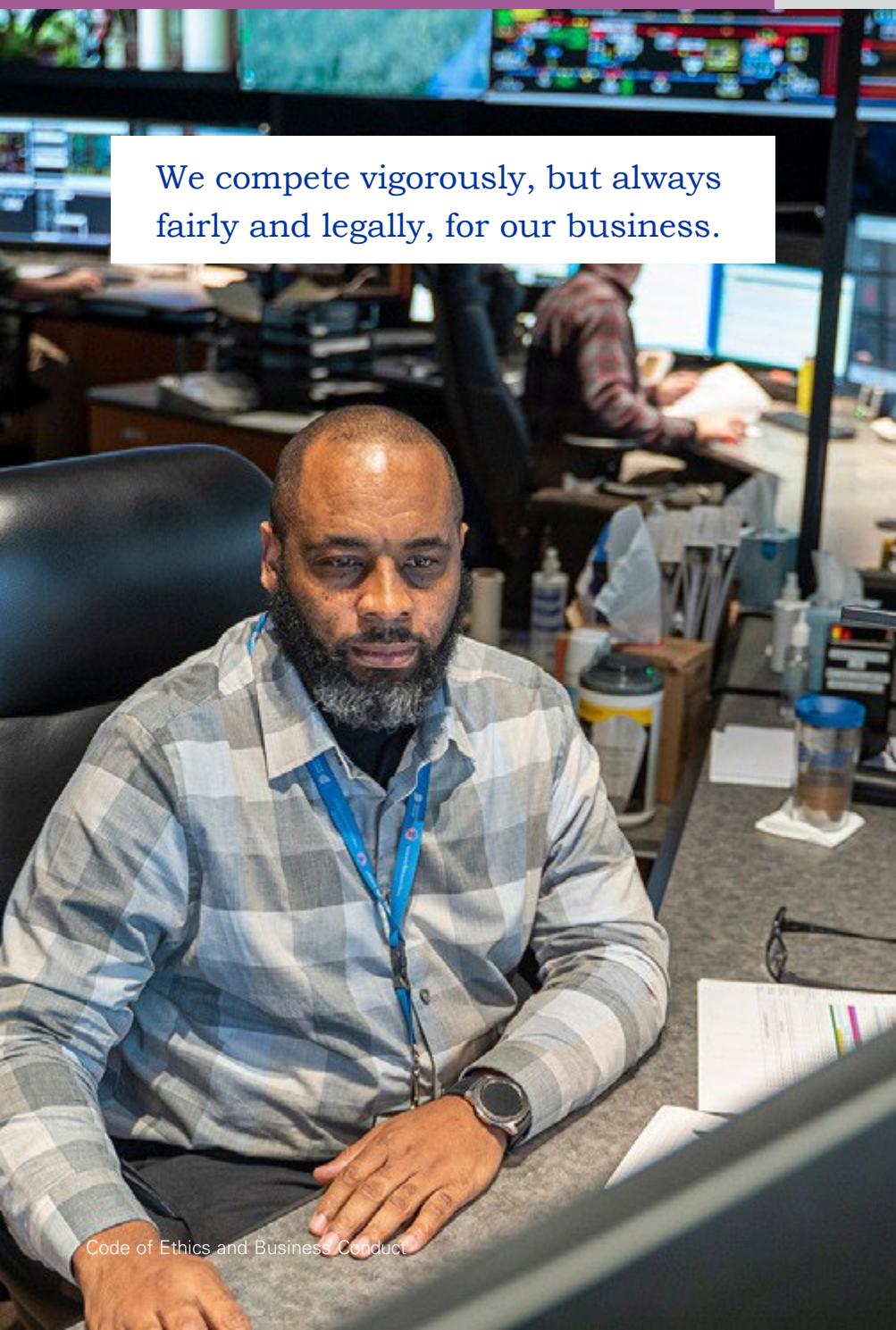
### For more information

[Antibribery and Anticorruption Policy](#)



**Foreign official** is a broadly defined term that includes elected and non-elected government officials, political parties and candidates for public office outside the United States, as well as employees of companies or entities owned or controlled by non-U.S. governments, and their family members.

A **kickback** is an illegal payment intended as compensation for preferential treatment or any other type of improper services received. Kickbacks are often referred to as a type of bribery.



## Prioritizing Integrity and Trust (continued)

### Competing Fairly

We compete vigorously, but always fairly and legally, for our business. We owe our success to the strength of our service, rather than to improper or illegal conduct. We encourage and support free and open competition in the marketplace and maintain full compliance with all antitrust laws. As team members, we each have a responsibility to advance the legitimate interests of the company and to deal fairly with our customers, vendors, suppliers, competitors and each other.



**During a conference dinner, regulators began to discuss confidential regulatory information. I quickly excused myself and left. Did I do the right thing?**

**Yes.** Dominion Energy is committed to fair competition, and if regulators were discussing confidential matters, even the impression that you could use the information to benefit the company would be a violation of that commitment. You were right to feel uncomfortable and remove yourself from the situation. In addition, you should report this interaction and your decision to leave.



### We live our Core Values because we:

- Only engage in ethical and honest marketing practices.
- Avoid inappropriate conversations with our competitors (either directly or indirectly) about prices, terms, vendors, suppliers or other competitors.
- Never make false claims about other organizations, advertise false information, describe our services in a misleading way or otherwise engage in unfair or deceptive competition, acts or practices.
- Never unfairly or wrongly gather or misuse competitive intelligence.
- Never attempt to gain advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

# Prioritizing Integrity and Trust (continued)

## Preventing Insider Trading

Sometimes in the course of our work, we gain access to material, non-public information. Information is generally considered to be material if there is a substantial likelihood that a reasonable investor would consider the information important when deciding whether to trade in a security. Information is not considered to be public unless it has been broadly disseminated to the public and a sufficient amount of time, generally one full trading day, has passed for it to be absorbed by the financial markets and the general public.

Executive officers, members of the company's board of directors and certain other employees notified by the Corporate Secretary must clear all transactions of company stock made by them or their immediate family members or a related entity in advance with the Corporate Secretary.

We must never buy or sell stocks, or tip others to do so, based on material, non-public information.



**One of our vendors mentioned at a non-work event that her company would be introducing a new revolutionary product. Since we were not at work, would it still be considered insider trading if I purchased stock in the company and benefited from this knowledge?**

**Yes.** If you act on this information and purchase the stock, it will be a clear example of insider trading. Where or how you discovered this information has nothing to do with the fact that it is material information unknown to the general public.



## We live our Core Values because we:

- Comply with all insider trading laws including by never buying or selling a security when we are aware of material, non-public information.
- Never disclose material, non-public information to anyone outside the company, including family members, relatives or friends.
- Contact the Corporate Secretary's Department to receive guidance if we have any questions about material, non-public information or our ability to trade.



## For more information

[Securities Trading Policy](#)

We never disclose inside information to anyone outside the company.



# Engaging in Political Activities Responsibly

We are committed to maintaining and enhancing strong and productive relationships with government officials through lawful participation in the political process while complying with the federal and state restrictions on monetary contributions and "in-kind" contributions, such as the use of facilities, tickets to receptions, payment for meals and lodging and gifts to public officials. A gift that may be acceptable if given to a private party could be illegal if given to a government official.

We feel encouraged and empowered to become personally involved in the political process and engage in civic activities. When we do so, we always make it clear that our political views and statements belong to us alone and do not reflect the beliefs or interests of the company.

The Dominion Energy Political Action Committee (PAC) is a voluntary, nonpartisan political action committee. In accordance with federal legal requirements, the federal PAC is funded solely by contributions from only vested shareholders and certain eligible employees, which include salaried employees who have executive, managerial, or professional responsibilities. All contributions go to support candidates pursuing sound energy policy.



**A work friend of mine is running for a position on the school board in our community. He asked me to drop off flyers for his campaign at homes in the district when I'm out doing field work. Since I'm going to be out and about anyway, is it okay for me to distribute the flyers?**

**No.** If you are in the field doing work for Dominion Energy, handing out flyers for a political candidate of any kind would be perceived as Dominion Energy's endorsement of that candidate, rather than your personal endorsement of him. It is never appropriate to give the impression that Dominion Energy supports a particular candidate for any office.



## We live our Core Values because we:

- Know, understand and comply with the laws governing interactions with government officials and candidates, including lobbying laws and gift restrictions.
- Seek advice ([politicallawreporting@dominionenergy.com](mailto:politicallawreporting@dominionenergy.com)) if we have questions regarding political contributions or lobbying activities.
- Clearly conduct our personal political involvement on an individual basis, on our own time and at our own expense.
- Never use company resources, such as computers, email, phones, stationery, copiers and other assets, to carry out personal political activities.
- Notify our leadership and the Ethics and Compliance Program if we decide to run for political office in order to avoid any potential conflicts of interest.



## For more information

[Conflicts of Interest Policy](#)

[Gifts to Government Officials Policy](#)

[Dominion Energy Lobbying Political Contributions Policy](#)

# Our Commitment to Excellence



# Keeping and Managing Accurate Records

## Creating and Maintaining Records that Match Our Standard of Excellence

We create and maintain thorough, accurate records that help us make responsible business decisions and provide prompt and truthful information to our customers, investors and government regulators. We report all financial transactions accurately, completely, fairly and in a timely and understandable manner.

The data we provide for the preparation of financial statements, regulatory reports and publicly filed documents must comply with generally accepted accounting principles and Dominion Energy's internal control procedures.

The actions or inactions related to maintaining records can affect internal controls, and therefore, compliance with the Sarbanes-Oxley Act of 2002 (SOX).

In some cases, we are entrusted with the use of a Dominion Energy Flex Card for travel expenses and company purchases. These Flex Cards may never be used for personal expenses, which includes any expense not considered business-related according to Internal Revenue Service guidelines. Internal Revenue Service regulations require documentation of the business purpose for all expenses, including the names of all persons for whom the expenses were incurred.



### We live our Core Values because we:

- Ensure the data we provide for the preparation of financial statements, regulatory reports and publicly filed documents comply with generally accepted accounting principles, internal controls and all relevant laws and regulations.
- Strictly adhere to records management policies and retention schedules in effect for business records within our area of responsibility.
- Understand and follow internal control policies and procedures that are relevant to our work areas.
- Comply with all company disclosure controls, policies and procedures.



### For more information

[Travel Policy and Procedures](#)

[Expense and Flex Card Policy](#)

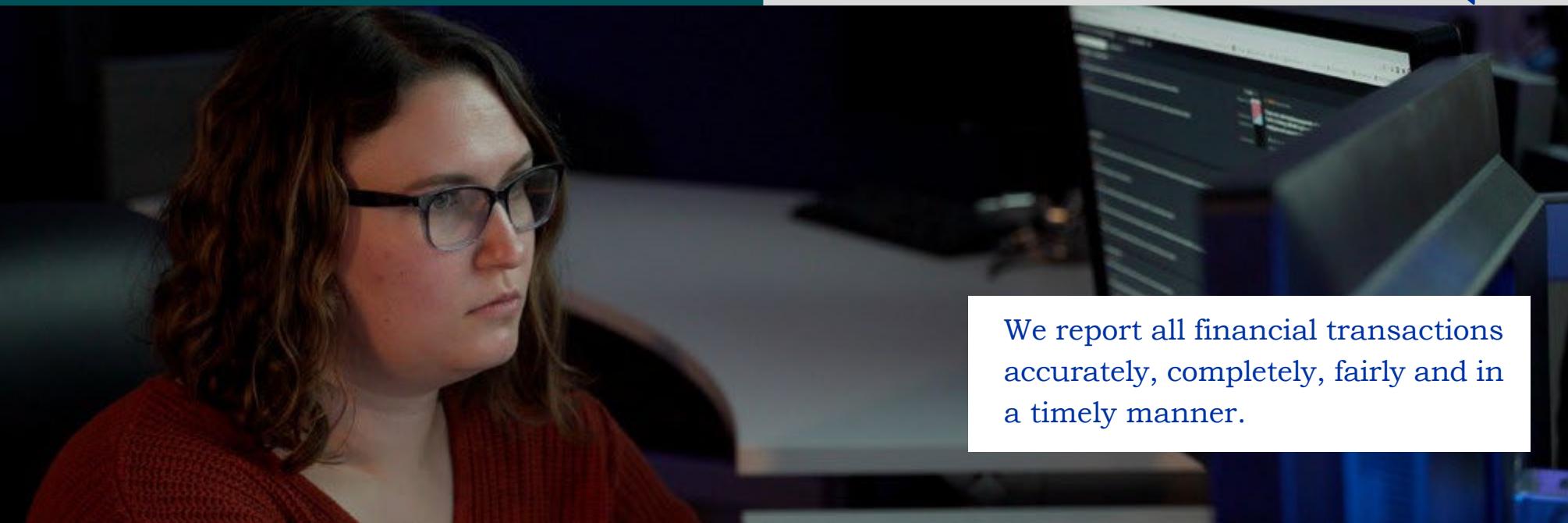
[Records and Information Management Policy](#)

[Conflicts of Interest Policy](#)

[Expenditure Control Policy](#)

[Time-Entry and Approval Policy \(Non-union\)](#)

[Time-Entry and Approval Policy \(Union\)](#)



We report all financial transactions accurately, completely, fairly and in a timely manner.

## Keeping and Managing Accurate Records (continued)



**Dominion Energy employees perform activities on a daily basis that affect internal controls tied to our financial statements. Examples of such activities include:**

- Completing a timesheet accurately and on time.
- Approving a timesheet.
- Approving access to information systems.
- Entering a goods receipt or service entry.
- Approving payments for goods and services.
- Reading a customer's meter accurately.
- Ensuring proper accounting when obtaining a part from the warehouse.
- Preparing and/or approving a journal entry.
- Overseeing a budget each month.
- Restricting access at your work location.

**Basic procedures for understanding, performing and documenting SOX controls include:**

- Understanding the risk of financial misstatement that the control is designed to address and the key steps that should occur in the performance of the control.
- Knowing what system information is being utilized in performing the control.
- Maintaining sufficient documentation to evidence performance of the control.
- Communicating any changes related to the control, including potential automation and ownership, timely to Accounting Controls: [accountingcontrols@dominionenergy.com](mailto:accountingcontrols@dominionenergy.com).

We cooperate fully with all regulatory inquiries.



Code of Ethics and Business Conduct

## Following Regulatory Requirements

We are committed to delivering excellence in every market we serve. This commitment has earned our team a reputation for excellence. We take great pride in our business and the fact that we are known for providing innovative, high-quality service.

### Interacting with Business Units and Affiliate Restrictions

The Federal Energy Regulatory Commission (FERC) and state utility commissions in several states where we conduct business have adopted codes and standards of conduct that govern transactions between the company's business units and affiliates. These codes and standards of conduct are intended to encourage well-functioning markets by preventing preferential treatment of company affiliates and to ensure that customers of our regulated businesses do not subsidize the company's non-regulated activities. To meet these objectives, codes and standards of conduct require that affiliates function independently and that certain types of information be protected. We restrict the sharing of certain categories of non-public information and require that certain information be posted on our website. It is our shared responsibility as team members to be aware of and comply with the codes and standards of conduct that apply to our work.



### We live our Core Values because we:

- Understand and comply with all legal and regulatory requirements that apply to us when we conduct activities on behalf of the company.
- Cooperate fully with all regulatory inquiries.
- Comply with all required reporting obligations to our regulators.



### For more information

Law Department  
Regulatory Compliance team  
[Standards and Codes of Conduct](#)

# Following Regulatory Requirements (continued)

## Complying with Energy Marketing Rules

When we buy and sell natural gas, electricity or other energy commodities on behalf of the company or document or report those transactions, we always follow the laws, regulations and policies that apply to those activities.

## Adhering to Electric Reliability Standards – North American Electric Reliability Corporation Compliance

Our businesses must adhere to regulatory requirements that are designed to ensure the safe and reliable operation of the nation's energy grid. The FERC has approved mandatory reliability standards that apply to owners and operators of electric power assets. The North American Electric Reliability Corporation (NERC) is certified as the Electric Reliability Organization with primary responsibility for overseeing development of and compliance with these standards. The system of compliance includes Regional Reliability Organizations, which oversee compliance within six geographical regions. The reliability standards require rigorous auditing and recordkeeping, as well as internal compliance efforts both at the corporate level and within affected business units.

## Export Controls

We are committed to complying with U.S. export control laws and regulations that are applicable to the company's activities. Export control laws and regulations govern the transfer of goods, services, technology and information across international borders and ensure that:

- employees, contractors and vendors who are non-U.S. persons are authorized to work for a U.S. employer; and
- non-U.S. persons are unable to gain access to export-controlled technology, technical information or technical data unless lawful compliance measures appropriate to the circumstances have been implemented.

Failure to comply with export control laws can result in liabilities for the company as well as potential harm to the United States and the economy. We analyze any potential threats associated with contractors, vendors or employees who are non-U.S. persons. This detailed analysis helps protect and insulate us from any potential liabilities associated with hiring or contracting with non-U.S. persons or entities.



For the purposes of export control laws and regulations, a non-U.S. person is an individual who is not a U.S. citizen by birth or naturalization; a lawful permanent resident of the United States (a "green card" holder); or an asylee or refugee granted asylum in the United States.



## We live our Core Values because we:

- Comply with all export control laws and regulations and understand that failure to comply can result in potential liability for the company as well as potential harm to the United States.
- Engage in a detailed analysis of every non-U.S. person, contractor and vendor to help protect us from any potential liability associated with non-U.S. personnel and non-U.S. entities.
- Understand how we fit into the export control process and why complying with the export control analysis is important.

# Safeguarding and Properly Using Company Assets

We recognize our responsibility to safeguard company assets from loss, theft or misuse and to use them responsibly for business purposes. Company assets include monetary funds, facilities and equipment as well as confidential information, data, intellectual property and systems. We never use or disclose proprietary or other confidential information to those outside the company without legal justification and we only share it internally with authorized persons on a need-to-know basis. If we have questions about the confidentiality of particular information, we contact the Law Department for guidance.

Company computers and other electronic equipment and communication systems are intended to be used for company business purposes and must be in compliance with the Electronic Systems Policy. Limited, occasional personal use of company equipment or systems for personal reasons is permitted unless otherwise prohibited. We must take special measures as outlined in the Cyber Security Policy to protect them from unauthorized access and help prevent data security incidents arising from:

- Unauthorized use of or access to company data or personally identifiable information (PII), which is any information that allows an individual's identity to be inferred, either directly or indirectly
- Attempts to access company systems or networks by unauthorized individuals
- Loss or theft of company-owned computer equipment
- Intentionally or unintentionally misdirected emails
- Unauthorized downloads or uploads of confidential or restricted data
- Social engineering attacks — a cybersecurity attack that relies on the psychological manipulation of human behavior to disclose sensitive data, share credentials, grant access to a personal device or otherwise compromise their digital security

We always remain aware that any electronic communications we engage in using company equipment are not private. Records of electronic communications may be made and used for a variety of reasons.



## We live our Core Values because we:

- Never download software to company electronic systems without prior approval
- Protect and safeguard all company passwords, and never share them with anyone
- Never use company systems to send messages that are in violation of any federal, state or local law
- Never access internet sites that contain offensive material on company-owned systems or equipment
- Protect and safeguard all company systems, computer equipment, smartphones or other personal electronic devices that are entrusted to us
- Never open an email or click a link in an [EXTERNAL] email unless we verify the message is legitimate by contacting the sender using a trusted number or in-person conversation
- Never send language or material containing sexual or violent content using company systems, computer equipment, smartphones or other personal electronic devices



## For more information

- [Cyber Security Policy](#)
- [Electronic Systems Policy](#)
- [Records and Information Management Policy](#)

# Safeguarding and Properly Using Company Assets (continued)

## Protecting and Respecting Intellectual Property Rights

We protect the company's rights to intellectual property, such as copyrights, trademarks, patents, trade secrets, company logos, publications and software we have created or developed, whether they have been registered or not. Intellectual property created by employees is generally owned by the company and should be reported in accordance with the Innovation Recognition and Rewards Policy. We do not, nor do we allow vendors or others outside the company to use Dominion Energy's logos or other intellectual property without appropriate licensing arrangements.

We respect the intellectual property of others. Even if the company has a license or permission to use certain materials for a particular purpose, that license may not cover all possible uses of the material. If we have questions about the intellectual property rights of others, we contact the Law Department.

Respecting the intellectual property rights of the company and others protects us from potentially costly liabilities and litigation.



**While doing my job, I came up with an idea for an invention that will help me do my job better, more safely and more efficiently. What should I do?**

**Notify your supervisor/manager as soon as you can and document your thoughts regarding the invention.** Doing so will preserve your ability to receive recognition or rewards for the invention (if applicable) and may prove to have value to the company.



## We live our Core Values because we:

- Respect intellectual property laws that apply to us and the license terms of all third-party assets.
- Always involve the IT Department if we engage with a third party to transfer data or information and follow all cybersecurity procedures to protect our data and systems.
- Only share data or intellectual property with authorized individuals on a need-to-know basis.
- Never copy, download or disseminate any intellectual property belonging to the company or a third party without express permission to do so.
- Only use software for which we have a business-use license.



## For more information

[Innovation Recognition and Rewards Policy](#)

[Copyright Compliance Policy](#)

# Respecting Privacy

At Dominion Energy, we value the trust customers, community stakeholders and employees place in us to respect and protect their privacy. Through business dealings, provisioning of our services and products and employment-related activities, we receive personal information from customers, stakeholders and employees. Laws and regulations restrict how we collect, utilize and maintain certain personal information. We must understand the nature of the personal information we receive and ensure confidentiality and privacy of such information.

We take privacy seriously. We meet privacy expectations by our recognition and commitment to privacy principles, which support and enable fair and compliant information practices.



## We live our Core Values because we:

- Incorporate by design the privacy principles into all aspects of business operations that interface with personal information.
- Are transparent and provide notice regarding our collection, use, dissemination and maintenance of personal information.
- Only collect personal information that is directly relevant and necessary to accomplish specified purposes and retain it only for as long as is necessary to fulfill the specified purpose.
- Report any potential unauthorized access to personal information, even if believed to be incidental.



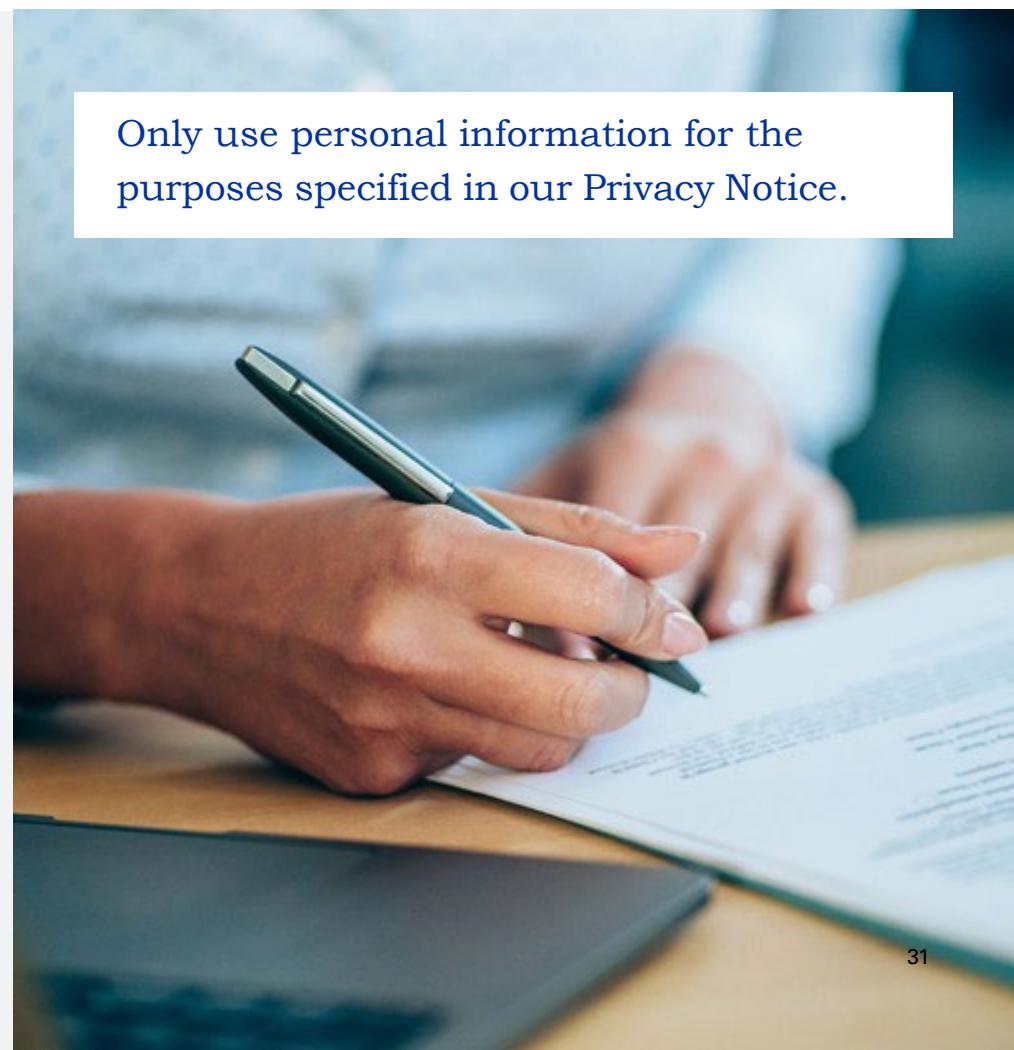
## For more information

[Cyber Security Policy](#)

[Privacy Notice](#)

[Privacy Guidelines for Customer Communications](#)

Only use personal information for the purposes specified in our Privacy Notice.



# Using Social Media Responsibly

Social media is a powerful communication and marketing tool, but it is also inherently public. Nothing we post is truly private, and we are mindful of the ways our words could be taken out of context, distorted or misunderstood. We must always use good judgment when we express ourselves online.

## Referring Inquiries to Media Relations

The Media Relations team maintains the company's relationship with the news media at all levels—national, trade, regional and local. We never speak on behalf of the company unless we are specifically authorized to do so; instead, we refer all media inquiries to the Media Relations Department or the Media Line at (804) 771-6115.



## We live our Core Values because we:

- Only make statements on behalf of the company if we are an authorized company spokesperson.
- Never create an official-looking or named Dominion Energy group or use the company logo in a way that it is mistaken for representing or speaking on behalf of the company unless we are specifically authorized to do so.
- Never post photos or videos of the company's restricted, secured and protected areas or critical energy infrastructure, work-related activities or facilities.
- Never disclose any sensitive, confidential or proprietary information belonging to the company or its affiliates on social media.
- Make sure our time spent on personal social media never interferes with our work commitments or performance.
- Are thoughtful, appropriate and respectful when posting online, being careful not to share information or opinions that could harm the company's reputation or violate any other company policy.



## For more information

[Social Media Policy](#)

[Expectations of Employees Policy](#)



# Protecting the Environment: Environmental Compliance and Stewardship

Environmental stewardship is the responsibility of every employee. It is embedded in our culture and core values. We always conduct our business in an environmentally responsible manner and in full compliance with both the letter and the spirit of environmental laws and regulations.

Some of the company's policies, procedures and best practices for environmental stewardship go beyond those of other companies and are more rigorous than what our regulators require of us. Failure to meet our environmental commitments could result in damage to the environment and to the company's reputation; could lead to criminal charges, fines and liabilities; and could endanger the health and safety of ourselves, our colleagues and those in the communities we serve.

If you become aware of a situation or practice that you suspect or know is harmful to the environment or does not comply with the company's environmental policies or with governing laws, rules and regulations, you have a duty to report your concern to the company.



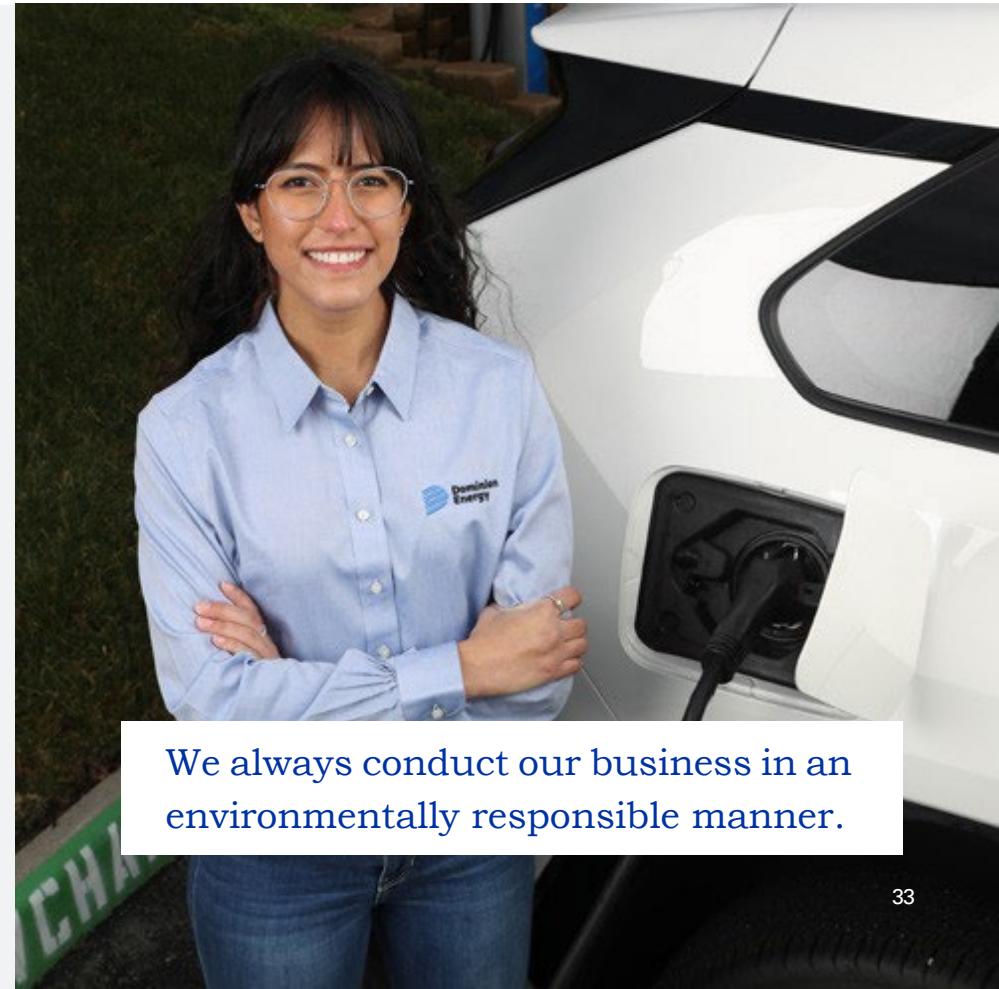
## We live our Core Values because we:

- Follow all applicable environmental laws, regulations and policies.
- Provide information and advice to our customers regarding sustainable and renewable energy.
- Prioritize and invest in renewable energy production and emissions reductions programs.



## For more information

[Environmental Policy Statement](#)



We always conduct our business in an environmentally responsible manner.

# Our Commitment to One Dominion Energy



# Celebrating Our Differences

Our competitive advantage lies in our ability to be agile and quickly respond to customer demands, competitive market forces and industry disruptors. We believe that having a wide range of perspectives is a great strength. We have a strategic plan focused on:

- Workforce Engagement: Creating a workplace environment where all employees are respected and valued
- Culture of Inclusivity: Fostering an environment where employees can utilize their unique strengths, skills, personalities and life experiences

We treat everyone with dignity, fairness and respect; and celebrate our talented workforce, which is enriched by people of varied backgrounds, education and life experiences. We are all responsible for maintaining this diverse and inclusive workplace and helping it thrive.



## We live our Core Values because we:

- Hire and promote with diversity in mind and base all employment-related decisions, including training and discipline, on merit alone.
- Encourage participation from all team members and seek out different ideas and viewpoints when making decisions and finding solutions.
- Actively listen to all perspectives with respect and courtesy.
- Speak up if our viewpoints or those of others are not respected.
- Avoid words or actions that could be offensive or degrading to others.



## For more information

[Equal Employment Opportunity Policy](#)  
[Expectations of Employees Policy](#)



## Celebrating Our Differences (continued)

We never tolerate discrimination of any kind. We are committed to ensuring that no employee, contractor or other agent or job applicant will ever be treated less favorably because they belong to one of the following protected classes:

- race
- color
- ancestry
- sex
- gender identity or expression
- political affiliation or beliefs
- pregnancy
- religion (including religious dress and grooming practices)
- national origin
- age
- actual or perceived physical or mental disability
- medical condition
- genetic information
- sexual orientation
- military or veteran status
- marital status
- status as a victim of domestic violence
- any other classification protected by federal, state or local laws



### Representation & Engagement

Our Executive Engagement & Inclusion Committee oversees the implementation of our Employee Experience strategy. In addition, each of the company's business units has its own Engagement & Inclusion Councils which work alongside the executive sponsors to integrate inclusion goals and practices into our core operations.

### Employee Resource Groups

Our Employee Resource Groups, which are open to all employees, bring together individuals with shared interests and backgrounds, creating opportunities to build community, enhance our work environment and expand networks.

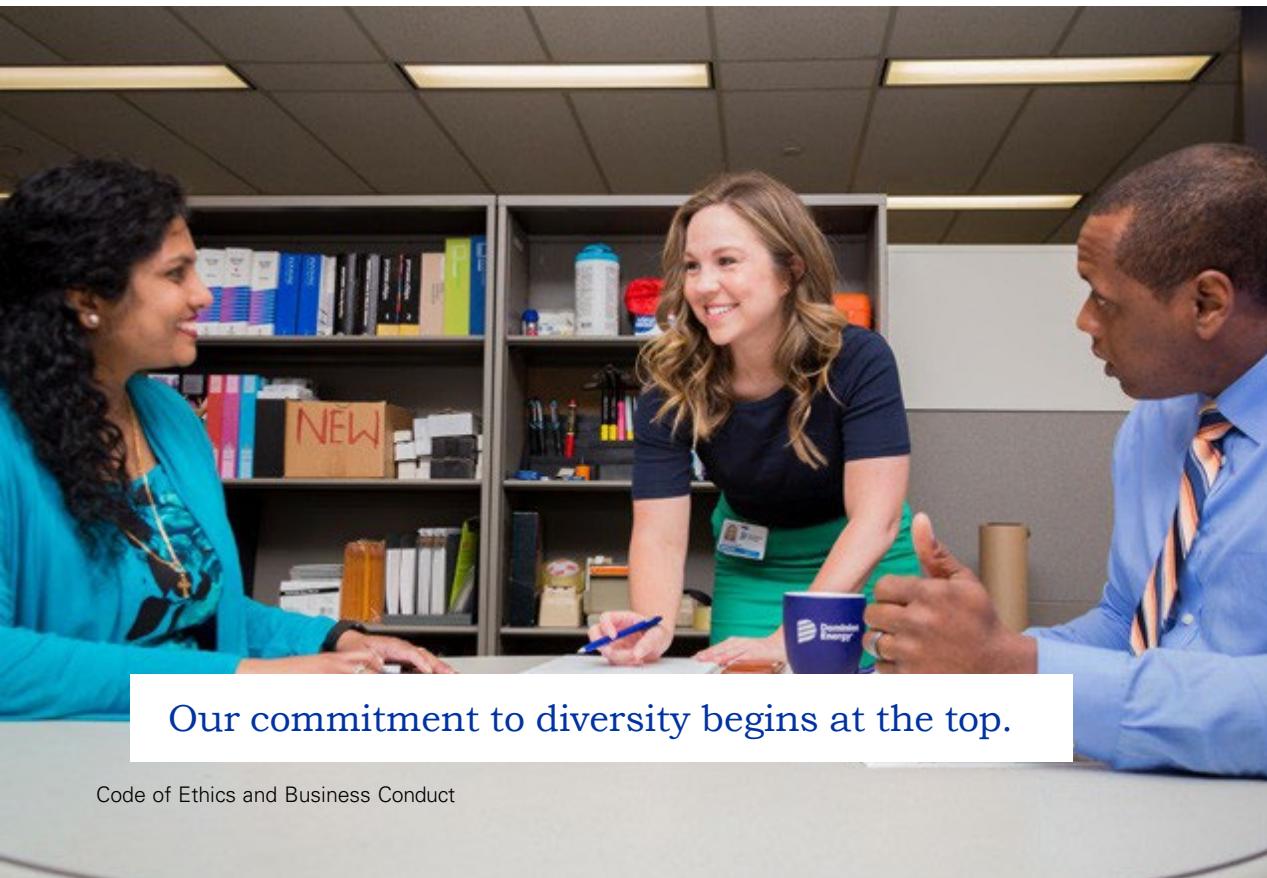
# Recognizing the Value of Our Team

We are proud of our inclusive, creative and productive work environment, one in which everyone feels accepted and respected. It is so meaningful to us that One Dominion Energy—our term for teamwork—is a foundational value.

## Preventing Bullying and Sexual and Other Forms of Harassment

Bullying and harassment undermine the integrity of our workplace and our shared respect of human dignity. The company does not tolerate them in any form. We all share responsibility to uphold this commitment and report any acts of bullying or harassment, intimidation or coercion, whether they are verbal, physical or visual, based on or related to any protected class.

Those of us who hold managerial responsibilities are held to an even higher standard to prevent an environment of distrust or unwillingness to report a concern and should ensure that our team members feel comfortable raising concerns without any fear of retaliation or reprisal.



Bullying and harassment take many forms. Examples include:

- abusive, threatening, degrading or unprofessional language in verbal or written communications
- mocking, taunting, gossiping, teasing or other forms of emotional abuse
- slurs, jokes or stereotypes; unwanted aggressive behavior of any kind
- touching someone aggressively or without consent or making advances of an aggressive or sexual nature
- blocking the path of a colleague or interfering with another person's work



## For more information

[Harassment Policy](#)

[Expectations of Employees Policy](#)

[Rules of Engagement: How We Talk to Each Other](#)

# Contributing to Our Communities

At Dominion Energy, we strive to be responsible citizens, exemplary environmental stewards, ethical businesspeople and friendly neighbors. We are proud of our long legacy as a public service corporation and know that we have a special responsibility to be a good corporate neighbor and to do what we can to enrich the communities around us.

We are focused not only on providing safe and affordable energy to our customers but also on caring for the human and environmental needs of the communities we serve. We actively support and improve the communities that we and our customers live in by volunteering and making financial contributions to civic projects, community programs and other causes that are important to us. The [Dominion Energy Charitable Foundation](#) is our philanthropic arm dedicated to improving the physical, social and economic well-being of the communities served by our companies.

We are encouraged to volunteer with nonprofit organizations and to participate in community activities, so long as participation does not interfere with job performance or create a conflict of interest with the company.



**I recently became a member of a local nonprofit with a \$150 payment. Only \$50 of my payment is a tax-deductible gift, and the remaining \$100 is for member benefits. Is it okay to request a full \$150 match through the company's Matching Gifts Program?**

**No.** Only the tax-deductible portion of the gift (\$50) is permissible for the Matching Gifts Program.



**We live our Core Values because we:**

- Engage in volunteerism for nonprofit organizations and participate in community activities.
- Endow scholarships for students in our communities.
- Provide grants to community organizations that provide aid in the areas of basic human needs, environmental stewardship, education and community vitality.
- Provide customers who face financial hardships with access to bill payment assistance programs.



**For more information**

[Volunteer Leave Time Policy](#)



# Our Commitment to Embrace Change



## Innovating and Welcoming New Ideas

Change is inevitable in every industry, and we embrace change as a core value. No matter what form change may take—new regulations, different needs of our stakeholders or new sets of expectations, just to name a few—we stand ready to adapt and adjust.

Our value of embracing change is embodied by our desire to welcome new ideas and innovations. Our culture always makes room for growth and advancement, and our ability to think differently and proactively helps us stay ahead of the rest of the pack.

Each day we approach our work with a mindset to improve, get better, solve problems and seize opportunities. Here at Dominion Energy, we are setting the pace by driving forward innovations that will benefit our customers, our investors and the communities we serve. You'll see projects, tools and technologies that employees are implementing to change the way we work—making us more agile, innovative and sustainable. We encourage all employees to be curious, share your ideas and take action.



No matter what form change may take,  
we stand ready to adapt and adjust.



### We live our Core Values because we:

- Create changes that improve our customers' experience, exceed our stakeholders' expectations and position our company for sustainable, agile and long-term success.
- Reinforce our culture of creative problem-solving through multiple avenues, including external partnerships, which inject fresh perspectives and facilitate the free exchange of ideas.

### For more information

[Innovation Recognition and Rewards Policy](#)



# Administering This Code

## Audit Committee

The Audit Committee of Dominion Energy's Board of Directors is responsible for oversight of the company's compliance with legal and regulatory requirements, including this Code of Ethics and Business Conduct. The Audit Committee also oversees the implementation and effectiveness of the Ethics and Compliance Program.

## Compliance Committee

The Chair, President and CEO appoints a high-level officer to serve as the company's Chief Compliance Officer. The company's Chief Compliance Officer oversees the Compliance Committee whose members are senior officers representing each business unit. The Committee meets regularly with the company's compliance leaders to review updates and discuss compliance trends in order to ensure an enterprise-wide approach to managing ethics and compliance at Dominion Energy. The Committee serves as a sounding board and provides strategic direction for the development and implementation of critical practices and controls for compliance matters, compliance training and awareness campaigns, as well as other ethics and compliance initiatives across the company.

## Program Administration

A director-level employee has been appointed to manage the day-to-day administration of the Ethics and Compliance Program. This director-level employee works with designated Compliance Attorneys, Officers, members of the Ethics and Compliance Program staff and other resources to handle concerns as they arise, depending on the business unit or area of the law or policy affected by the concern.

The Director of Ethics and Compliance meets with the Audit Committee on a regular basis to review compliance matters and the operations of the program, and has the authority to contact individual members of the Audit Committee at any time between meetings to report concerns or otherwise discuss ethics and compliance issues.

# Waivers of the Code (if applicable)

All employees are expected to follow the standards set forth in this Code. In limited and appropriate circumstances, the Chief Compliance Officer may grant a waiver of a Code provision. Waivers for officers and board members must be referred to the Corporate Secretary's Department and approved by the CEO. To the extent required by law or stock exchange rules, the grant of any waiver of this Code of Ethics and Business Conduct for an executive officer or board member must be approved by the Audit Committee of the board and will be disclosed to shareholders promptly.

