



# Supplier Code of Ethics and Business Conduct





## A Message from Wendy Wellener

Value Chain Partners,

At Dominion Energy, we are working to become the most sustainable energy company in America. Safety and ethics remain core to our efforts to deliver safe, reliable, affordable, and sustainable energy. Across our footprint, we are committed to operating our business in accordance with the highest standards of ethical, environmental, and human rights conduct.

It is imperative that you, our suppliers, share our commitment to integrity, ethics, and accountability, and ensure your employees, agents, and subcontractors review, understand, and comply with Dominion Energy's requirements detailed in The Supplier Code of Ethics and Business Conduct (the Code).

The Code outlines our minimum expectations of suppliers when working on our behalf. Dominion Energy suppliers are expected to attest to review of the Code on an annual basis. Understanding and adherence to the Code are critical to a successful partnership with Dominion Energy. I encourage you to periodically review the document, ask questions, and commit to compliance and continuous improvement.

It is important we all continue to prioritize the health and safety of employees and customers and report unsafe or unethical behavior.

Thank you for being trusted partners on our roadmap to a more sustainable future.

Wendy Wellener  
*Vice President of Shared Services*

## About this Code

This Supplier Code of Ethics and Business Conduct outlines Dominion Energy's minimum expectations of suppliers when working on our behalf. It is intended to promote lawful and ethical behavior by all in our business dealings. It serves as a guide for supplier decisions and actions when working with Dominion Energy. Use this Code when faced with an ethical choice or concern. It is a valuable resource for meeting our high standards of business conduct and our obligations to shareholders, customers, business partners, the community and each other.

Dominion Energy expects our suppliers and their employees, agents, and subcontractors to review and comply with this Code. Noncompliance can result in termination of contracts or removal of a supplier from consideration for future business opportunities.

## Ethics and Compliance

Ethics is a core value at Dominion Energy, and we are strongly committed to conducting our business in accordance with the highest ethical standards. Dominion Energy suppliers, contractors, consultants, and vendors, and their respective employees, agents, and subcontractors (collectively, "suppliers") are expected to share Dominion Energy's commitment to ethics and compliance and must comply with the highest level of ethical standards when conducting Dominion Energy business. Suppliers in all locations are expected to comply with the spirit and the letter of all applicable laws and regulations that apply to the work they perform.

## Reporting Concerns

Suppliers (and their personnel) have a duty to report any conduct of a Dominion Energy employee or supplier or subcontractor personnel that is perceived as unethical or in violation of Dominion Energy's policies, this Supplier Code of Ethics and Business Conduct, or legal requirements. If a supplier is aware of suspected misconduct, illegal activities, fraud, or misuse of Dominion Energy assets, it is their responsibility to report the concern immediately.

Suppliers may report concerns directly to a member of Dominion Energy's Supply Chain Management, by contacting the Dominion Energy Compliance Line by phone at 1-800-628-1798, or online at [www.dconcern.com](http://www.dconcern.com).

The Dominion Energy Compliance Line is managed by an outside vendor that specializes in compliance line services. The caller has the option of reporting a concern or seeking advice anonymously. The compliance line vendor does not record telephone calls, track caller ID, trace electronic communications, or otherwise attempt to determine your identity. The Dominion Energy Compliance Line is open 24 hours a day, seven days a week.

Dominion Energy strictly prohibits any kind of retaliation against any individual who, in good faith, reports a concern to the Dominion Energy Ethics and Compliance Program.



## Health and Safety

Safety is also a core value at Dominion Energy. Suppliers and Dominion Energy employees share the responsibility for ensuring a safety-conscious environment. Everyone wins when safety comes first.

Dominion Energy, along with our suppliers, must resolve unsafe conditions and maintain a safe work environment for employees, customers, and the general public. While on Dominion Energy property or performing services for Dominion Energy, suppliers and their employees are expected to be familiar with and follow all applicable Dominion Energy safety procedures. Suppliers must take precautions to protect the health and safety of their employees. For example, appropriate, well-maintained personal protective equipment must be worn by Suppliers' workforce when performing work for or on behalf of Dominion Energy.

When operating a vehicle on Dominion Energy business, drivers shall comply with the state vehicle code and operate their vehicles safely at all times, including minimizing all distractions while driving and obeying all posted road regulations.

In addition, suppliers must require their employees to be fit for duty and must maintain a safe work environment free from the use, possession, or sale of alcoholic beverages, illegal drugs, or other intoxicants. Furthermore, the abuse of prescription or non-prescription drugs that adversely affect any worker's ability to perform their duties is prohibited.

# Respect for Human Rights

Dominion Energy believes every person has a right to be treated with dignity and respect; to exercise autonomy and self-determination; to receive fair and equal treatment; and to work in a safe and supportive workplace regardless of individual attributes or membership in a demographic class. We support the principles outlined in internationally recognized human rights principles such as the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. Throughout our operations and across our value-chain we are committed to a humane workplace free from discrimination, harassment, physical coercion, and any form of workplace violence.

Suppliers have a responsibility to share Dominion Energy's commitment and report any acts (verbal, physical, or visual) of harassment, intimidation, or coercion related to race, color, ancestry, sex, gender, religion (including religious dress and grooming practices), national origin, age, actual or perceived physical or mental disability, medical condition or status, genetic information, sexual orientation, gender identity or expression, military or veteran status, marital status, status as a victim of domestic violence, or any other classification protected by law.

When working on behalf of Dominion Energy, suppliers are expected to follow all applicable laws and regulations regarding:



## **Underage or Child Labor**

The use of child labor is prohibited. Suppliers shall only employ workers that meet the applicable minimum legal age for employment as prescribed by the local authority and no workforce members under the age of 18 shall perform work that may expose them to inappropriate hazards.



## **Forced or Compulsory Labor**

Suppliers shall ensure that all work is voluntary. The use of or participation in the exploitation of workers, forced or involuntary labor (including prison labor and any form of human trafficking) is prohibited.



## **Wages and Benefits**

Suppliers are expected to comply with all applicable laws and regulations regarding wages, benefits, and hours of work. In the case of overtime, suppliers must compensate workers at the legal premium rate.



## **Freedom of Association**

Suppliers shall respect workers' right to freely assemble and associate with others, and to form and join (or not join) a labor union.



## **Responsible Sourcing**

Dominion Energy expects suppliers to engage in responsible procurement which includes ensuring that products and services procured are from ethical sources that do not directly or indirectly finance perpetration of human rights abuses. Suppliers should take reasonable steps to ensure that products they manufacture or contract to manufacture do not contain conflict materials as outlined in Section 1502 of the Dodd-Frank Act.



## Non-Dominion Energy Workers Policy

Dominion Energy has instituted a policy to manage all workers at Dominion Energy who are not employees. As part of the policy, which became effective on September 1, 2017, there are requirements for suppliers of labor, including but not limited to staff augmentation suppliers.



### **Recruiting Current Employees**

As part of the policy, suppliers and subcontractors must not solicit any current employee of Dominion Energy for the purpose of having the employee perform work on accounts of any Dominion Energy company in the future when the employee has separated employment with Dominion Energy.



### **Former Employees as Non-Dominion Energy Workers**

There are additional requirements related to the use of former Dominion Energy employees that suppliers should be aware of. Each former employee is required to observe a separation period after their employment from Dominion Energy, the length of which varies with the service the former employee is providing but should be expected to be at least a year. There also may be limits to the number of hours a former employee can charge to Dominion Energy depending upon the type of service they are providing. Please contact [nondworker@dominionenergy.com](mailto:nondworker@dominionenergy.com) for more details or to obtain answers to questions.



## Commitment to Sustainability

At Dominion Energy, our mission is to become the most sustainable energy company in America. Throughout the value chain we are reducing our emissions, minimizing waste, and engaging our customers and communities as we prioritize environmental and social responsibility.

Sustainability is integrated into our procurement process and suppliers are expected, at minimum, to align with Dominion Energy's commitment to sustainability. Annually, select suppliers may be required to complete an annual assessment of sustainability practices and impacts across their organization. We encourage all suppliers to work to perform due diligence to understand their potential sustainability risk and environmental impacts.

To learn more about our sustainability commitments, priority issues, and progress, visit [sustainability.dominionenergy.com](https://www.dominionenergy.com/sustainability)

# Environmental Compliance and Stewardship

Environmental protection is the responsibility of Dominion Energy and Dominion Energy suppliers. As an environmental steward, Dominion Energy complies with all environmental laws and regulations. Dominion Energy's policies, procedures, and work practices may be stricter than those of other companies and Dominion Energy may also establish best practices that are more rigorous than what our regulators require of us. If you are unclear about Dominion Energy's policies or requirements, ask us.

It is Dominion Energy's expectation that suppliers conduct their activities in a manner that fully complies with all applicable environmental laws, regulations, and standards in accordance with Dominion Energy's policies, procedures, and work practices. Dominion Energy will fully exercise its contractual remedies associated with any supplier's failure to meet compliance obligations and will hold its suppliers responsible for the actions and omissions of their subcontractors.

We expect our suppliers to share our commitment and actively work to reduce their impact on the environment.



## **Air & Greenhouse Gas Emissions**

In response to climate change challenges and in alignment with Dominion Energy's Net Zero commitment, suppliers should work to identify, measure, disclose, set targets, and take actions to minimize Greenhouse Gas (GHG) and other harmful emissions resulting from operations. In addition, suppliers should continue to, or prepare to, report emissions, targets, and progress to Dominion Energy on an annual basis.



## **Biodiversity**

Suppliers should ensure that their operations minimize impacts to nature and the planet's natural resources including waterways, wildlife, and natural habitats.



## **Waste Minimization**

Suppliers should minimize and prevent waste of all types and always comply with applicable laws and regulations related to hazardous substances and waste.



## **Innovation**

Suppliers should proactively pursue and partner with Dominion Energy to identify and develop sustainable materials, packaging, and transportation solutions.

To learn more about our innovation strategy, visit [sustainability.dominionenergy.com/innovation/](https://sustainability.dominionenergy.com/innovation/)

Failure to meet our environmental requirements (for example, failure to follow a Stormwater Pollution Prevention Plan, incomplete or late inspection reports, or slow response to repairs) could result in damage to the environment, imperil human health and safety, or damage Dominion Energy's reputation. It could also lead to criminal charges, fines, and liabilities. Any situation or practice that is suspected or known to be harmful to the environment or does not comply with Dominion Energy's environmental policies or with governing laws, rules, and regulations must be reported to the Dominion Energy Compliance Line.



## Supplier Diversity

Dominion Energy is committed to supporting and respecting all communities across our service territory. We ensure small, local, diverse businesses have opportunities to partner with us – including women-owned, minority-owned, service-disabled veteran-owned, veteran-owned, LGBT-owned, disability-owned, HUBZone, and small disadvantaged businesses. A diverse supplier base leads to improved supplier performance, more competitive pricing, better risk mitigation, and enhanced creativity and innovation.

To learn more about Dominion Energy's commitment to Supplier Diversity and other DE&I efforts, visit [dei.dominionenergy.com](https://dei.dominionenergy.com)

Suppliers are expected to share Dominion Energy's commitment to Supplier Diversity by sub contracting with small and diverse suppliers, conducting and maintaining size and diversity status verifications, and complying with reporting requirements. Dominion Energy's non-diverse prime suppliers are required to provide maximum practicable opportunities for diverse suppliers to participate as subcontractors on all Dominion Energy projects, with a minimum goal of 20% of subcontracted items awarded to diverse suppliers.

## Conflicts of Interest

Dominion Energy's Conflicts of Interest policy states a conflict can occur when a personal or family interest interferes with—or could be perceived to interfere with—the ability of an employee or board member to make sound, objective business decisions on behalf of Dominion Energy. A conflict of interest or the appearance of a conflict of interest may arise even if an employee is not in a decision-making role for the company.

Conflicts of interest can undermine business judgment and threaten Dominion Energy's reputation as well as that of our suppliers. Even the perception of a conflict of interest can cause the intent of someone's actions to be questioned. Our suppliers and their employees, agents, and subcontractors must promptly disclose any potential conflicts of interest to Dominion Energy management prior to any business transaction taking place.

Various laws, rules, and reporting requirements may apply when interacting with government employees and officials both in the United States and in foreign countries. Violations of these requirements can result in significant civil and criminal penalties. Suppliers who interact with government employees or officials as part of their job are expected to know and follow all such requirements and restrictions.

## Business Courtesies

The giving and receiving of gifts, entertainment, meals, and other business courtesies can be important and appropriate ways of building and maintaining proper business relationships but are never expected or required for doing business with Dominion Energy. In certain instances, exchanges can create a conflict of interest or the appearance of a conflict of interest. Therefore, suppliers must not offer any business courtesy to Dominion Energy employees or agents that is intended to or may appear to be intended to influence our business decisions or that otherwise violates Dominion Energy's Code of Ethics and Business Conduct.

Suppliers are prohibited from offering or giving gifts, services, discounts, or other items of value to a Dominion Energy employee, customer, union official, or other third parties doing business or seeking to do business with Dominion Energy. Gifts inadvertently received from a supplier must be returned to the Supplier.

Gifts with a nominal value, \$100 or less, which are related to the maintenance of ongoing legitimate business relationships, are acceptable.

Examples of appropriate gifts include promotional items, food or beverages, tickets to ordinary sports or entertainment events, or supplier discounts available to all employees. Over the course of a calendar year suppliers are prohibited from giving gifts to any one Dominion Energy employee that on a combined basis exceeds \$200 in value.

It can be acceptable for a supplier to pay for meals and tickets to sports, theater, and other entertainment events provided that Dominion Energy has a business relationship with the supplier, the supplier is present at the event or meal, and the cost of the entertainment is reasonable under the circumstances. If overnight travel is required to attend the event, it is Dominion Energy's policy to pay for travel and overnight accommodation expenses associated with the event.

Gifts in the form of cash or anything that can be converted to cash, such as cash gift cards, are never permitted.

Suppliers are prohibited from offering or giving gifts, services, discounts, or other things of value to government officials.



## Accounting and Financial Reporting

Suppliers must maintain and ensure accurate financial and operating records and reporting that applies to Dominion Energy work.

## Insider Trading

Insider trading is both unethical and illegal. As a supplier working for Dominion Energy, you may not buy or sell Dominion Energy stock at any time when you are aware of “material” information about the company that is not available to the general public.

Information is generally considered “material” if there is a reasonable likelihood that an investor would consider the information important when deciding whether to trade in a security or if the information could significantly affect the market price of the security if made public. Examples of information likely to be material include earnings, financial results or forecasts, unannounced dividends, possible mergers, acquisitions, divestitures, or joint ventures, and key personnel changes. Information is not considered to be public unless it has been circulated in a news release, public filing, or other public disclosure, and a sufficient amount of time has passed for it to be absorbed by the financial markets.

## Protection and Proper Use of Dominion Energy’s Assets

Dominion Energy’s corporate resources are available to help achieve legitimate business goals. Suppliers have a responsibility when using Dominion Energy assets such as Dominion Energy facilities, equipment, materials, information, systems and supplies to only use them for legitimate business purposes. This responsibility includes protecting Dominion Energy property from loss, theft, abuse, and unauthorized use.

## Protection of Confidential Information, Copyrights, and Intellectual Property

Suppliers who receive or access confidential information regarding Dominion Energy's customers, shareholders, or employees have an ethical and legal responsibility to preserve the privacy, confidentiality, and security of this information, and use it only for appropriate business reasons and in compliance with applicable privacy laws and contractual requirements. At Dominion Energy, privacy is an important part of how we do business, and we expect our suppliers with access to personal information to protect it and collect, maintain, and transmit it securely.

Suppliers must not share confidential information about Dominion Energy with the media, competitors, family, or any other third parties. Confidential information includes information that has not been disclosed to the general public about financial data, customer accounts, pending acquisitions or divestitures, trade secrets, contracts, projects, strategic plans, regulated information, personal information, or legal proceedings.

Dominion Energy has specific legal rights and protections with respect to our intellectual property. Dominion Energy owns numerous copyrights, trademarks, patents, and trade secrets, including Dominion Energy logos, publications, and software that we have created or developed. Suppliers and others outside of Dominion Energy may not use Dominion Energy's logo or other intellectual property without appropriate licensing arrangements.

## Cyber Security and Prohibited Products

Supplier shall have and comply with a data security program to include management, operational, and technical controls governing protection of confidential information. Suppliers must comply with all applicable U.S. state and federal laws, regulations, and other legal or self-regulatory requirements in any jurisdiction relating to data privacy, data protection, data security, communications secrecy, and data breach notification.

Suppliers and any Subcontractors shall comply with all bans and/or restrictions related to the applicable use of certain foreign technologies as set forth in 48 CFR 52.204-23 and 48 CFR 52.204-25. Additionally, Dominion Energy's Cyber Security Policy includes a complete list of prohibited products, services, and vendors a supplier or subcontractor shall not use in relation to work performed on behalf of Dominion Energy. An excerpt of the section related to prohibited products, services, and vendors is available upon request.

Suppliers may have access to, store, handle and/or process personal data deemed necessary to perform work. Dominion Energy requires that our suppliers handle personal data with the utmost care, personal data must only be processed in accordance with specific instructions from Dominion Energy and scope of the work to be performed. Suppliers and Subcontractors with access to personal data shall implement a comprehensive written information security program and must comply with all U.S. federal, state, and local data privacy laws.

## Regulatory Requirements

Many aspects of Dominion Energy’s business are subject to federal and state regulatory rules and laws. Suppliers are required to understand and comply with the regulatory requirements that apply to them when conducting activities for or on behalf of Dominion Energy.

The Federal Energy Regulatory Commission (FERC) and state utility commissions where Dominion Energy conducts business have adopted codes and standards of conduct that govern transactions between Dominion Energy’s business units and affiliates. These codes and standards of conduct are intended to encourage well-functioning markets by preventing preferential treatment of Dominion Energy affiliates and to ensure that customers of our regulated businesses do not subsidize Dominion Energy’s non-regulated activities. To meet these objectives, the codes and standards of conduct require that affiliates function independently, restrict the sharing of certain categories of non-public information, and require that certain information be posted on Dominion Energy’s website. Suppliers must be aware of and comply with the codes of conduct and standards of conduct that apply to their work.

## International Business Conduct

Whenever we conduct our business, whether inside or outside of the U.S., we have zero tolerance for bribery. We must maintain accurate books and records.

The U.S. Foreign Corrupt Practices Act (FCPA) makes it a crime for companies and their directors, officers, employees, and agents to offer, promise, or pay anything of value — including gifts, payments, or other improper inducements — to a foreign official for the purpose of influencing them in the performance of their duties. “Foreign official” is broadly defined, and includes 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. In addition, the accounting provisions of the FCPA require that Dominion Energy maintain accurate books and records, and a robust system of internal controls. Violation of the FCPA could result in fines, penalties, or imprisonment. Other laws and regulations inside and outside the United States similarly restrict improper payments made to non-government recipients.

Accordingly, suppliers, and their employees, agents, and subcontractors, are prohibited from offering and/or giving anything of value on behalf of Dominion Energy or while performing work on behalf of Dominion Energy to the type of individuals identified above. When conducting business outside of the United States, suppliers must be aware of the accounting standards and special legal requirements that apply to international business relationships.

## Antitrust and Fair Competition

Dominion Energy and suppliers must comply fully with the letter and spirit of laws designed to preserve free and open competition. Our business activities are subject to state and federal antitrust laws. The purpose of these laws is to promote fair competition. The antitrust laws apply to a wide range of activities, including marketing, procurement, contracting, mergers and acquisitions, and the location and operation of our facilities. Antitrust laws are complex, and their requirements are not always obvious. Violations can lead to severe penalties and criminal sanctions.

Suppliers who have any questions regarding the applicability of antitrust laws to a particular situation are encouraged to consult their own legal counsel.

## Philanthropy

Dominion Energy welcomes the opportunity to consider partnering with suppliers through civic projects and programs that benefit our communities. However, supplier contributions are never required for doing business with Dominion Energy. Immediately inform your sourcing contact if you receive a request for a contribution while actively participating in a bid event.



## To report a concern, call 1-800-628-1798

You may call the Dominion Energy Compliance Line 24 hours a day, seven days a week. All calls are handled by personnel trained to respond to compliance-related calls. The person who answers your call will take detailed notes of your conversation, and then will read the notes back to you to ensure that the information you provided has been accurately documented.

## Or go online [www.DConcern.com](http://www.DConcern.com)

If you report a concern electronically through the Dominion Energy Compliance Line Online, you will be directed through a series of screens where you will be asked to provide information about your concern.