



## Supplier Code of Ethics and Business Conduct

### A message from Carter Reid

Ethics is a core value at Dominion Energy. That means qualities such as integrity, individual responsibility and accountability matter as much as bottom-line results. Dominion Energy believes doing right and doing well are inseparable.

Dominion Energy expects our employees, our suppliers, and their employees, agents and subcontractors to conduct themselves with the highest ethical standards in our business relationships.

This Supplier Code of Ethics and Business Conduct outlines Dominion Energy's minimum expectations of suppliers when working on our behalf and 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. Dominion Energy expects our suppliers and their employees, agents and subcontractors to comply with this Code. Noncompliance can result in termination of contracts or removal of a supplier from consideration for future business opportunities.

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.

A handwritten signature in black ink that reads "Carter M. Reid".

Carter Reid  
*Executive Vice President,  
Chief of Staff and Corporate Secretary and  
President Dominion Energy Services*

## 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, vendors and their 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.

## 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 vehicle 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 excessive fatigue and the use, abuse and possession of illegal drugs and alcohol. Suppliers must be mindful of the importance of working in a safety-conscious environment and do their part to keep it that way.

## Workplace Conduct and Human Rights

Suppliers must comply with Dominion Energy's commitment to a humane workplace free from discrimination, harassment, physical coercion, and any form of workplace violence. Suppliers have a responsibility to uphold 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, 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.

Dominion Energy's suppliers shall support and respect internationally-recognized human rights. Suppliers shall not use, or participate in the exploitation of workers, forced or involuntary labor. Use of child labor is not acceptable. Suppliers shall not employ any person under the 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. Suppliers are expected to ensure that wages, benefits and hours of work comply with all applicable laws and regulations.

## Responsible Sourcing

Suppliers shall take reasonable steps to ensure that products they manufacture or contract to manufacture do not contain Conflict Materials within the meaning of Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act. Ultimately, 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 are responsible for ensuring that subcontractors are aware of and comply with the principles of conduct in this Code.

## Supplier Diversity

Dominion Energy is committed to doing business with small, local, diverse suppliers including women-owned, minority-owned, service-disabled veteran-owned, veteran-owned, LGBT-owned, disability-owned, HUBZone, and small disadvantaged businesses. Suppliers are also 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.

## 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 employees, 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.

## 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. As part of the policy, neither suppliers nor any subcontractor must solicit for employment any current employee of Dominion Energy for the purpose of having the employee perform work on accounts of any Dominion Energy company after their employment with Dominion Energy has concluded.

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 amount 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.

## 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.

## 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.

## Protection of Confidential Information, Copyrights and Intellectual Property

Suppliers who are provided with 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.

## 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.

## Environmental Compliance and Stewardship

Environmental protection is the responsibility of Dominion Energy and Dominion Energy suppliers. Suppliers must share Dominion Energy's commitment as an environmental steward and must at a minimum comply 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 requirements, ask us. It is Dominion Energy's expectation that suppliers conduct their activities in a manner that fully complies with all applicable 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.

Failure to meet our environmental commitments (for example, failure to follow a Stormwater Pollution Prevention Plan; incomplete or late inspection reports; slow response to repairs) could result in damage to the environment and to Dominion Energy's reputation and could also lead to criminal charges, fines and liabilities and imperil human health and safety. 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.

## Commitment to Sustainability

Clean energy, environmental and social responsibility, serving our customers and community, and the employee experience are key pillars of our sustainability focus. Suppliers are expected, at a minimum, to align with Dominion Energy's commitment to sustainability. See the commitment here: <https://sustainability.dominionenergy.com/commitments>

## International Business Conduct

Whenever we conduct our business, whether inside or outside of the U.S., we must have zero tolerance for bribery and 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 partner with suppliers through civic projects and programs that benefit our communities. However, supplier contributions are never required for doing business with Dominion Energy.

## Reporting Concerns

Suppliers (and their personnel) have a duty to report any conduct of a Dominion Energy employee, 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 or by calling the Dominion Energy Compliance Line at 1-800-628-1798 or by using the Dominion Energy Compliance Line online at the following link:

<https://ethicsandcompliance.alertline.com/gcs/welcome>

The Dominion Energy Compliance Line call center and the Dominion Energy Compliance Line online are managed by an outside vendor. The caller has the option of reporting a concern or seeking advice anonymously. This 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, raises an ethics or compliance concern.

Credits

Photography: Doug Buerlein page 1.

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