



## Supplier Code of Ethics and Business Conduct

**Ethics** is one of our core values at Hope Gas. We value integrity, personal responsibility, and accountability. We expect our employees and suppliers to conduct themselves with the *highest* ethical standards at **all** times.

This **Supplier Code of Ethics and Business Conduct** outlines Hope Gas' 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 Hope Gas, our customers, business partners, and the community in which we serve.

### Ethics and Compliance

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

### Health and Safety

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

Hope Gas, along with our suppliers, must resolve unsafe conditions and maintain a safe work environment for employees, customers, and the general public. While on Hope Gas property or performing services for Hope Gas, suppliers and their employees are expected to be familiar with and follow all applicable Hope Gas 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 Hope Gas. When operating a vehicle on Hope Gas 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.

## Workplace Conduct and Human Rights

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

Hope Gas' suppliers shall support and respect internationally-recognized human rights. Suppliers shall not use, or participate in the exploitation of workers, forced or involuntary labor. 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, Hope Gas expects suppliers to engage in responsible procurement which includes ensuring that products and services procured are from ethical sources and that sub-suppliers are aware of and comply with the principles of conduct in this Code.

## Supplier Diversity

Hope Gas is committed to doing business with diverse suppliers including women-owned, minority-owned, service-disabled veteran-owned, HUBZone, veteran-owned, disadvantaged and small businesses. Suppliers are also expected to share Hope Gas's commitment to Supplier Diversity by contracting with diverse suppliers, conducting and maintaining size and diversity status verifications, and complying with reporting requirements.

## Conflicts of Interest

Hope Gas'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 Hope Gas. 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 Hope Gas's reputation as well as that of our contractors. 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 Hope Gas 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-Hope Gas Workers Policy

Hope Gas has recently instituted a policy to manage all workers at Hope Gas who are not employees. As part of the policy, which is 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 Hope Gas for the purpose of having the employee perform work on accounts of any Hope Gas company after their employment with Hope Gas has concluded.

There are additional requirements related to the use of former Hope Gas employees that suppliers should be aware of. Each former employee is required to observe a separation period after their employment from Hope Gas, 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 Hope Gas 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 Hope Gas. 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 Hope Gas employees or agents that is intended to or may appear to be intended to influence our business decisions or that otherwise violates Hope Gas's *Code of Ethics and Business Conduct*.

Suppliers are prohibited from offering or giving gifts, services, discounts, or other items of value to a Hope Gas employee, customer, union official, or other third-party doing business or seeking to do business with Hope Gas. 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 Hope Gas 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 Hope Gas 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 Hope Gas'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 Hope Gas work.

## Regulatory Requirements

Many aspects of Hope Gas'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 on behalf of Hope Gas.

The Federal Energy Regulatory Commission (FERC) and state utility commissions, where Hope Gas conducts business, have adopted codes and standards of conduct that govern transactions between Hope Gas's business units and affiliates. These codes and standards of conduct are intended to encourage well-functioning markets by preventing preferential treatment of Hope Gas affiliates and to ensure that customers of our regulated businesses do not subsidize Hope Gas'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 Hope Gas'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 Hope Gas'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 Hope Gas, 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 Hope Gas 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, contracts, projects, strategic plans or legal proceedings.

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

## Protection and Proper Use of Hope Gas's Assets

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

## Environmental Compliance and Stewardship

Environmental protection is the responsibility of Hope Gas and Hope Gas suppliers. Suppliers must share Hope Gas's commitment as an environmental steward and must comply with all environmental laws and regulations. Hope Gas's policies, procedures, and work practices may be stricter than those of other companies. If you are unclear about Hope Gas's requirements, ask us. It is Hope Gas's expectation that suppliers conduct their activities in a manner that fully complies with applicable laws and regulations, and in accordance with Hope Gas's policies, procedures, and work practices. Hope Gas will fully exercise its contractual remedies associated with any supplier 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 Hope Gas'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 Hope Gas's environmental policies or with governing laws, rules and regulations must be reported to the Hope Gas Compliance Line.

## 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 Hope Gas 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 Hope Gas or while performing work on behalf of Hope Gas 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

Hope Gas 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

Hope Gas 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 Hope Gas.

## Reporting Concerns

Suppliers (and their personnel) have a duty to report any conduct of a Hope Gas employee or supplier personnel that is perceived as unethical or in violation of Hope Gas' 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 Hope Gas assets, it is their responsibility to report the concern immediately.

Suppliers may report concerns directly to a member of Hope Gas' Supply Chain Management or by calling the Hope Gas Compliance Line at **1-800-628-1798** or by using the Hope Gas Compliance Line online at the following link: <https://ethicsandcompliance.alertline.com/gcs/welcome>

The Hope Gas Compliance Line call center and the Hope Gas 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 Hope Gas Compliance Line is open 24 hours a day, seven days a week.

Hope Gas strictly prohibits any kind of retaliation against any individual who, in good faith, raises an ethics or compliance concern.