




## Supplier Code of Ethics and Business Conduct Policy

	<b>Document #:</b>	LG-007		
	<b>Revision No.</b>	1	<b>Origination/Revision Date:</b>	10/4/2024
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At Hope, we believe in putting safety above all else, acting with the highest standards, and working all together. Our core values are integral to how we do business, and we expect our Suppliers to respect and promote these values.



This Supplier Code of Ethics and Business Conduct (“Code”) applies to all the Suppliers of goods and services (“Suppliers”) who support Hearthstone Holdings, Inc. DBA Hope Utilities, Inc. and its subsidiary companies (collectively, “the Company” of “Hope”). We define Suppliers as consultants, contractors, suppliers, vendors and their employees, agents or subcontractors who provide goods and services to Hope. Suppliers may not subcontract any portion of responsibilities without the prior written permission of Hope.

To the extent Hope agrees to allow Suppliers to subcontract, Suppliers shall ensure that all subcontractors are bound by the terms of this Code. Suppliers are expected to educate their employees, agents and subcontractors so they understand and comply with this Code.

Suppliers are required to comply with the expectations in this Code, applicable policies, position statements, and all contractual obligations with Hope. Compliance with this Code is a requirement for becoming or remaining a Supplier with Hope. The expectations set forth here are intended to supplement, not replace requirements established by contract or purchase order. While Suppliers are expected to self-monitor and demonstrate their compliance with the Code, Hope may audit Suppliers to confirm compliance. Suppliers that behave in a manner that is inconsistent with the Code risk termination of their business relationship with Hope.

If you have a question regarding this Code, or you experience, observe or are informed of any conduct that is not in compliance with this Code, you have a responsibility to report it immediately – even if you are not sure whether a Code violation has occurred.

We provide numerous reporting options so you can report concerns in whatever way you choose.

- Speak to your Hope supply chain management/procurement representative
- Contact the Compliance Officer at [complianceofficer@hopegas.com](mailto:complianceofficer@hopegas.com)
- Contact the third-party Compliance Hotline (available 24 hours a day and with the option to remain anonymous)
  - Incident Reporting Website: <https://hope.ethicaladvocate.com>
  - Incident Reporting Hotline: 1-866-530-8140


Hope will maintain confidentiality to the extent possible and we strictly prohibit any retaliation against individuals who, in good faith, report a violation or suspected violation of the law, Code or other policy, or participate in an investigation. We also expect our Suppliers to take appropriate steps to prevent retaliation and address confirmed allegations as necessary. If you believe you have been retaliated against by someone at Hope, please notify us through one of the reporting options noted above.

Thank you for the work you do and your commitment to our values.

Kind Regards,

Morgan O’Brien

President and CEO

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### Drive and Sustain a Safety Culture

Our safety first approach focuses on creating an open, transparent and trusting culture where we share experiences, learn from events and collaborate to help protect ourselves, our coworkers, our customers and the general public. We expect our Suppliers to support our safety first approach by adhering to all Hope safety policies and procedures and actively participating in safety learning events, whenever requested.

Suppliers are expected to always treat safety as one of their primary responsibilities; work in ways that prevent injury to themselves, others and customer/Hope property; exercise good judgment; and apply safe and healthy work practices to all activities. Additionally, Suppliers are to:

- Promote and follow all safety and health laws, regulations and procedures
- Speak up and intervene if something appears unsafe
- Require the use of appropriate and Occupational Safety and Health Administration (OSHA) compliant personal protective equipment to protect from hazards where applicable
- Promptly notify Hope of any actual or potential safety, health or environmental hazards or fatalities, injuries, near miss events, or property damage on Hope premises or project sites
- Promptly notify Hope of any contact by a representative of a regulatory agency relating to work performed on behalf of Hope (e.g., OSHA letter)

### Establish a Drug Free Workplace


Drug or alcohol use may pose a serious threat to health and safety. It is, therefore, the policy of Hope to establish a “Drug Free Workplace” by preventing substance use or abuse from having an adverse effect on our team, and to provide all of our team a working environment free from alcohol and controlled substance misuse. Hope maintains that the work environment is safer and more productive without the presence of alcohol, illegal or inappropriate drugs in the body or on Hope property. Furthermore, our team has a right to work in an alcohol and drug-free environment, and to work with others free from the effects of alcohol and drugs. Individuals who abuse alcohol or use drugs are a danger to themselves, their coworkers, Hope, and Hope’s assets.

### Fairly Select Suppliers

Our Suppliers are integral to our success, and we are prudent in our Supplier selection. We are committed to fair and ethical dealings in bid evaluation, negotiation, award decisions and the administration of purchasing and sourcing activities. Our decision to select a Supplier is based on fair and objective criteria, including safety record, technical, commercial or other valid business reasons. Suppliers are therefore expected to cooperate with all due diligence requests and processes received from Hope. However, participation in the bidding or selection process is not a guarantee of selection nor is selection a guarantee of exclusivity.

We recognize the value of diverse suppliers such as minority-owned, women-owned, veteran-owned, LGBTQ-owned, disability-owned, and small business ownership. Hope expects Suppliers to have equivalent policies to promote diversity in their supply chains. Suppliers must agree to make a reasonable effort to seek, use and develop diverse Suppliers and subcontractors while performing work on Hope’s behalf and provide Hope verification of these efforts upon request.

Suppliers that employ subcontractors to supply goods or services to Hope must disclose the names of all subcontractors upon request. In addition, Suppliers are responsible for ensuring that all such subcontractors comply with this Supplier Code and any other requirements that Hope may establish from time to time.

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## Respect Each Other

We expect Suppliers to promote and maintain a workplace free from discrimination by treating all customers, employees, agents, subcontractors and Hope site visitors with respect and dignity. In addition, Suppliers are expected to demonstrate zero tolerance for violence, harassment, threats, intimidation, bullying, assault or aggressive conduct, either spoken or written.

If you experience, observe, or are informed of any possible discrimination, harassment, or other unacceptable behavior against yourself or another person, you are expected to promptly report the incident to Hope using one of the reporting options stated in this Code.

## Protect Human Rights

Hope is committed to upholding the human rights and ethical treatment of all people – and expects the same commitment from Suppliers.

Suppliers must comply with the letter and spirit of applicable U. S. and international labor and employment laws, and the general principles set forth in the International Labor Organization Conventions, including those associated with equal opportunity, immigration, child labor, forced and trafficked or compulsory labor. Additionally, workers must be fairly compensated for their work and wages should comply with local laws regarding minimum wage, wage payment, and work hours.


In addition, Hope recognizes the right of all employees to select union representation, in accordance with applicable laws. Through collective bargaining, we facilitate positive union relations and promote collaboration on business challenges that impact our operations and workforce.

We expect Suppliers, as legally permitted, to respect rights of workers to associate freely with others, form, and join or not join labor unions or organizations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment and comply with all applicable local and national laws pertaining to freedom of association and collective bargaining.

Reviews and assessments of Supplier employment practices may be conducted to ensure ongoing compliance with employment laws and this Code. Suppliers are expected to fully cooperate during these inspections, provide access to relevant records, and permit interviews with workers where necessary.

## Protect the Environment

We reflect our commitment to the environment through our actions. We comply with all applicable environmental laws, permits, conditions and other requirements pertaining to the operation of our facilities. We actively seek Suppliers that share our commitment to environmental preservation, and drive efforts to reduce negative environmental impact. Suppliers must abide by the letter and the spirit of all federal, state and local environmental laws including, but not limited to, pollution, waste disposal, and air emissions. Additionally, Suppliers must comply with all contractual obligations with Hope, and all permits and registrations must be obtained when required. Suppliers are also expected to monitor their environmental impact and implement practices and improvements to minimize harm to the environment wherever possible. Reviews and assessments of environmental practices may be conducted to ensure ongoing compliance with state and local environmental laws and this Code.

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### Comply Responsibly

Our businesses are heavily regulated by many federal, state and local governmental entities, including the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Securities and Exchange Commission (SEC). In addition, state agencies, such as public utility commissions, pollution control agencies and departments of natural resources have regulatory oversight, and government-sponsored entities. In addition to those specifically called out in this Code, our Suppliers are expected to comply with all applicable domestic and foreign laws and regulations.

Violations of these rules – whether intended or not – can damage our operations, financial sustainability and reputation. If local laws are less restrictive than this Code, Suppliers are expected to comply with the expectations in this Code. Suppliers should implement a compliance program commensurate with their size and risk exposure to prevent, detect and correct issues of noncompliance.

### Keep Accurate Books and Records

Accurate and complete record keeping and reporting provides transparency to our stakeholders and help us meet our legal and regulatory requirements. Maintaining financial integrity reflects positively on our credibility and demonstrates our value of trustworthy.


Suppliers are expected to comply with generally accepted accounting principles (GAAP) when submitting financial records or materials to Hope, and utilize a system of internal controls to promptly, completely and accurately prepare required reports, vouchers, reimbursement requests and invoices. Suppliers must follow all applicable laws and contractual requirements in creating, maintaining and disposing of records created during their performance that accurately and fully reflect their business dealings with Hope. Suppliers are expected to create business records for Hope in an honest and accurate manner and provide copies of such records to Hope upon request.

### Avoid Conflicts of Interest

Suppliers are expected to act in the best interest of Hope and to avoid conflicts of interest. A conflict of interest exists when a Supplier’s personal interests interfere with or may appear to interfere with its responsibilities to Hope. Conflicts, or potential or perceived conflicts, can occur in many forms and situations. The following examples are not all-inclusive but provide some common situations where actual or perceived conflicts might occur and should either be avoided or disclosed:

- Employs a current or former Hope employee (or someone with a close personal or family relationship to a Hope employee) to perform work for Hope
- Is engaged or overseen by a Hope employee with whom they have a close personal relationship
- Is partially or fully owned or controlled by a current or former Hope employee or someone with whom they have a close personal relationship
- Has access to Hope’s proprietary information while providing goods and services to Hope’s competitors
- Provides services to develop a request for proposal (RFP) to be issued by Hope and seeks to bid on the work covered by that RFP

The above circumstances are not meant to be an exhaustive list. Additionally, Suppliers must inform us before entering a business transaction with Hope if you have a family member working at Hope or its affiliates or if you are or have been an employee of Hope. Your signed Supplier Conflict of Interest Disclosure Form is hereby incorporated herein by this reference and made a part of this Policy.

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**Non-Solicitation**

Suppliers and subcontractors must not solicit for employment any current employee of Hope for the purpose of having the employee provide goods or services to Hope or Hope’s customers after their employment with Hope has concluded.

Each former employee is required to observe a separation period after their employment from Hope, 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 Hope depending upon the type of service they are providing. Suppliers are expected to abide by these restrictions and shall not engage in any conduct that may cause a former Hope employee to violate these post-employment requirements in any way. Please contact your Hope supply chain management/procurement representative or the Compliance Officer for more details or to obtain answers to questions regarding any former Hope personnel.

**Protect Company Assets**

Solving our customer’s energy needs in the most practical and affordable manner is part of our mission, and the resources needed to accomplish this goal are immense. Hope assets include items like equipment, buildings tools, vehicles, and supplies (“Hope Assets”). Suppliers are responsible for keeping Hope assets safe from inappropriate use, theft, loss, damage or fraud and for properly using these assets in accordance with laws, rules, regulations and policies. Furthermore, taking or using company assets for unauthorized personal use is strictly prohibited.

Suppliers are expected to abide by all access, network security and badging policies established by Hope from time to time. Please contact your Hope supply chain management/procurement representative or the Compliance Officer for more details one these policies.

**Safeguard Intellectual Property**

Suppliers may not use Hope’s name or logo, trademarks or other intellectual property for any purpose without the express written consent of Hope. In addition, Suppliers are prohibited from speaking on behalf of Hope or using Hope’s name in any capacity without the prior express written approval of a duly authorized Hope representative.

**Handle Information with Care**


The information we create and utilize is critical to our success. Suppliers are responsible for properly managing and protecting information against loss and unauthorized access, especially any proprietary, confidential, and restricted information. Suppliers shall abide by all Hope confidentiality policies when receiving, storing, or otherwise receiving any proprietary or confidential information from Hope.

Suppliers shall not collect, store, use, disclose, dispose of or otherwise process personal data in connection with performing any work unless specifically authorized by Hope in writing.

Suppliers are also prohibited from using Hope confidential or proprietary information for their benefit, including making financial trades based on material nonpublic information.

Information created and contained within or transmitted via Hope’s technology is the property of Hope. Suppliers are prohibited from using Hope’s technology for any purpose other than performing the work authorized by Hope in writing. Hope will have access to, and ownership over, all information created, communicated, transmitted and/or stored in Hope information technology systems for any purpose.

In the event of an actual or suspected data security breach involving unauthorized access to information, Suppliers are expected to immediately contact [cybersecurity@hopegas.com](mailto:cybersecurity@hopegas.com).

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**Gifts, Meals and Entertainment**

We strive to build good working relationships with our Suppliers, customers and other business partners, and we realize that giving or accepting modest forms of gifts, meals and business entertainment can help build those relationships. However, we must always maintain integrity in our business relationships and remain impartial, objective and free of outside influence. We expect the same from our Suppliers.

Suppliers must never offer personal incentives, gifts, meals or business entertainment to Hope employees to influence a business decision. Any gift provided to a Hope employee must be modest in value and designed to create goodwill or strengthen the business relationship. Small or nominal promotional items, gifts and entertainment given in the regular course of business and in accordance with federal, state, local and international laws are generally acceptable. However, care should be taken not to provide business courtesies on a frequent or continual basis.

It can be acceptable for a Supplier to pay for meals and tickets to sports, theater and other entertainment events provided that Hope 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’s practice to pay for travel expenses associated with the event.

Providing gifts of cash or a cash equivalent, like a gift card or certificate, stocks or securities, is expressly forbidden. In addition, gifts may not be exchanged during active contract negotiations. Suppliers are also prohibited from providing business courtesies to foreign and domestic public officials and employees on Hope’s behalf without the prior express written approval of a duly authorized Hope representative.

**Never Bribe**


We abide by anti-bribery and anti-corruption laws. We deal with our customers, Suppliers, and the governments of all communities in which we operate in a straightforward and aboveboard manner.

Suppliers must not pay or receive bribes, kickbacks or unlawful payments to or from any public official, government entity or other individual, whether foreign or domestic, to secure any contract, concession or favorable treatment.

This prohibition extends to the payment or receipt of money or anything else of value to consultants, agents or other intermediaries when the Supplier has reason to believe that some part of the payment will be used for a bribe or otherwise to influence action on Hope’s part. Suppliers are expected to maintain their own anti-corruption policies, conduct appropriate due diligence on the parties with whom they work, and maintain accurate books and records.

**Compete Fairly**

We believe in fair competition and are committed to complying with all antitrust laws and regulations. Antitrust laws prohibit any agreement or arrangement among competitors that could restrain trade, including agreements to fix prices, divide or manipulate markets, limit production or unlawfully restrict competition. We require our Suppliers to abide by all applicable fair competition and antitrust laws.

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**Follow Trade Laws**

We are committed to complying with all applicable export control and economic sanctions laws of the United States. These laws restrict transfers, exports and sales of products, software or technical data from the United States, or re-export of such United States origin items from countries other than the United States to certain countries, territories and designated parties, based on the nature of the item and/or the “embargoed” status of the recipient. In some circumstances, these laws also restrict the sharing of technical data with foreign nationals located within the United States.

Suppliers are required to comply with United States export control and economic sanctions laws and are prohibited from cooperating in foreign boycotts that the United States does not support.

**Appropriately Participate in Political Activities**

Hope works with federal, state and local officials on political activities important to our company, employees, customers and shareholders. We make sure that our interactions are clear, transparent and in full compliance with all laws, regulations and company policies.

Suppliers are prohibited from making representations in connection with political activities on behalf of Hope without prior approval and must ensure all interactions and relationships with public officials are professional and productive and comply with all related laws and regulations.

**Ensure Continuity of Operations**

Hope expects its Suppliers to manage business continuity risk in terms of ensuring availability of critical services to Hope during a disaster event. Therefore, we expect our Suppliers to have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis, natural disaster or terrorist/security related event. Suppliers are expected to share these plans with Hope upon request.

**Contribute to the Community**


Suppliers are strongly encouraged to provide resources to support and contribute to the communities and countries in which they operate. Hope welcomes the opportunity to partner with Suppliers through civic projects and programs that benefit our communities and customers. However, Supplier contributions are never required for doing business with Hope.

**Report Concerns**

Suppliers (and their personnel) have a duty to report any conduct of a Hope employee or Supplier personnel that is perceived as unethical or in violation of Hope’s policies, this Code or legal requirements. If a Supplier or its personnel are aware of any suspected misconduct, illegal activities, fraud, or misuse of Hope assets, it is their responsibility to immediately report the concern to Hope.

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



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**Compliance with the Code: Investigations and Corrective Actions**

It is our goal to build trust-based relationships with ethical suppliers and business partners who comply with this Code. In furtherance of this goal, we take a risk-based approach to training our Suppliers and requiring evidence of compliance with the requirements of this Code. We expect our Suppliers to fully cooperate with our reasonable requests for data, information, certifications, and audit access to verify compliance, and to obtain assurances that their own business partners and producers uphold these principles.

When there is a concern, or Hope becomes aware of facts that indicate a Supplier has breached this Code, our practice is to investigate these incidents and work with the Supplier to develop an action plan to address the concern. However, during an investigation, we reserve the right to suspend all contractual and business operations with the Supplier for any reason. If we determine that an issue cannot be corrected, or a Supplier is unwilling to engage or reasonably cooperate, we further reserve the right to terminate our agreement(s) with that Supplier and pursue any other legal or regulatory rights and remedies that may be available to Hope.

This Conduct sets forth the minimum requirements that must be met to be a Hope Supplier. We encourage our Suppliers to have due diligence and management systems in place to maintain these minimum requirements. By working closely with our Suppliers, we believe we can achieve mutual success while helping communities and the wider world thrive.

Please contact your Hope supply chain management/procurement representative or the Compliance Officer to obtain information about designated Hope representatives or for questions or details regarding this Code or any other Hope policies referenced herein.

**Miscellaneous**

This Code may be amended or modified by Hope, from time to time, in its sole and absolute discretion. Any such amendments or modifications to this Code shall be effective upon publication on <https://hopegas.com/vendors/>, with such publication deemed notice to Supplier effective immediately upon publication on the website. Hope’s failure to insist on or enforce strict performance of this Code shall not be construed as a waiver by Hope of any right or any provision it has to enforce its rights provided under this Code or any other contracts or agreements between Hope and Supplier, nor shall any course of conduct, course of performance, or course of dealings between Hope and Supplier or any other party be deemed to alter, amend, change, or modify any provision of this Code. This Code supersedes all conflicting agreements, communications, understandings, or representations included in any purchase order or other document delivered by Supplier, which are hereby expressly disclaimed and rejected.