Welcome to

The
PG&E
Code of
Conduct
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Our Mission, Vision and Culture form the foundation for our standards of ethics and compliance. Our Code of Conduct helps to ensure that all of us understand the expectations and requirements for which we are accountable.
A MESSAGE FROM THE CHIEF EXECUTIVE OFFICER AND PRESIDENT

PG&E Team,

Every day, 16 million Californians depend on us to safely and reliably provide affordable, clean energy. And every day, our reputation is on the line. We are all responsible for doing our work with the highest standards and for acting with integrity, transparency and humility. Our Code of Conduct is one of our best tools for getting this right.

With our Mission, Vision and Culture as the foundation, our Code of Conduct helps to ensure that all of us understand the expectations and requirements for which we are accountable and how we go about meeting them. Please take time to read and understand this Code and bring it to life in your own role at PG&E.

Living up to the Code helps us earn and safeguard the trust of our customers, regulators, coworkers and community members.

“Thank you for your commitment to following our Code of Conduct and to the success of PG&E.”

If you ever have questions about our Code, or if you have concerns about safety, possible misconduct or potential violations of laws, regulations or internal requirements, promptly notify your leader or contact resources such as our Compliance & Ethics Helpline or Corrective Action Program. Pacific Gas and Electric Company is currently in a five-year probation program as part of the company’s sentence for violating the National Gas Pipeline Safety Act and for obstructing an agency proceeding. The program includes an independent monitor, and we are fully cooperating with the monitor team.

To live up to our commitments on safety, transparency and continuous improvement, we need a culture where everyone feels comfortable raising safety or misconduct concerns and where we work as one team to solve our challenges. I invite everyone to speak up with confidence as part of our no-retaliation policy. The leadership team is committed to listening up and following up.

Thank you for your commitment to following our Code of Conduct and to the success of PG&E. I look forward to working together to make the future as bright as it can be for our customers and our company.

GEISHA J. WILLIAMS
CEO and President
PG&E Corporation
SAFETY MESSAGE FROM THE PRESIDENT AND CHIEF OPERATING OFFICER

Team,

Being a part of the PG&E team means demonstrating every hour of every day that nothing is more important than safety.

We do everything in our power to watch out for each other, our customers and our contractors. We back each other up in supporting a positive safety culture. A pillar of our Culture is that we succeed through collaboration and partnership. We are one team, and our commitment to safety is one of the most visible ways we demonstrate that.

For us, it’s not enough to notice. We have to speak up, we have to listen up, and we have to follow up. Maintaining a culture where everyone feels comfortable sharing their ideas and concerns is essential to operating safely.

Each of you is PG&E’s best advocate for a safe workplace. You are closest to the work you do, you know the most about the risks of that work, and you are best equipped to manage those specific risks. Whenever you have a safety issue or concern, speak up immediately. We are committed to listening up and following up.

“Safety is a day-to-day mindset—a personal pledge we make to ourselves, to each other and to our customers. I’m proud to be part of a culture that takes that commitment to heart.”

There’s a saying that “safety is job one.” But I believe safety is more than just a job for us. It’s a day-to-day mindset—a personal pledge we make to ourselves, to each other and to our customers. I’m proud to be part of a culture that takes that commitment to heart.

Thank you for putting safety first.

NICK STAVROPOULOS
President and Chief Operating Officer
Pacific Gas and Electric Company
Adhering to our Code of Conduct is critical to carrying out our Mission, achieving our Vision and living our Culture.
Adhering to our Code of Conduct is critical to carrying out our Mission, achieving our Vision and living our Culture. It is the document that guides our overarching commitment to compliance and our ethical Culture.

**Our Mission**
To safely and reliably deliver affordable and clean energy to our customers and communities every single day, while building the energy network of tomorrow.

**Our Vision**
With a sustainable energy future as our North Star, we will meet the challenge of climate change while providing affordable energy for all customers.

**Our Culture**
We put safety first.
We are accountable. We act with integrity, transparency and humility.
We are here to serve our customers.
We embrace change, innovation and continuous improvement.
We value diversity and inclusion. We speak up, listen up and follow up.
We succeed through collaboration and partnership. We are one team.

Our Code demonstrates how we will achieve our Mission, Vision and Culture. Every PG&E employee is responsible for complying with the Code, laws, and regulations, in all actions. The Code of Conduct is divided into sections that address:

- Our ethical commitments
- Speak up, listen up, follow up
- Building trust with various stakeholders: with each other, with our business contacts, with our customers and communities, and with government entities

PG&E does not grant waivers to the Code of Conduct. This PG&E Code of Conduct is an addition to, and not a replacement of, regulatory and legal policies.

In a dynamic and fluid business climate, it’s not possible to predict every conceivable situation, so whenever possible check the online version of the Code of Conduct for the most current information.
We take personal responsibility for speaking up, listening up and following up.

Our Ethical Commitments

As one team, we behave in a manner that is safe and ethical, and in a way that is consistent with applicable laws and PG&E Culture and policies.
We conduct ourselves in an honest and ethical manner in accordance with our Culture, and comply with all laws, rules and regulations, and our company’s policies, standards and procedures.

**ADHERING TO THE CODE OF CONDUCT**

We are one PG&E. We are all expected to understand the Code of Conduct and complete annual web-based training on the Code on time.

As one team, we behave in a manner that is safe and ethical, and in a way that is consistent with applicable laws and PG&E Culture and policies. We take personal responsibility for:

- Speaking up, listening up and following up
- Raising questions and concerns if we become aware of possible violations of laws, regulations, our Code or PG&E requirements
- Cooperating fully when responding to an investigation or audit

**Additional responsibilities for PG&E leaders**

When in a leadership position, we take on additional responsibilities for compliance and ethics by:

- Building trust and creating an environment that makes it safe for employees to speak up to share ideas and concerns
- Following through with commitments with the appropriate degree of urgency
- Resolving issues and following up with employees who raise issues
- Seeking guidance if unsure of the appropriate course of action
- Recognizing employees for raising issues
- Openly acknowledging when we are wrong or don’t know the answer
- Being an ethical role model
- Making compliance and ethics an essential part of leadership accountability

**As a PG&E employee**

I will comply with the laws, regulations and PG&E requirements that apply to my job.

- I will ensure that my decisions and actions don’t give the appearance of impropriety.
- I will speak up promptly about possible misconduct, safety issues or new ideas.
- I won’t retaliate, threaten retaliation or tolerate retaliation by others.

**As a PG&E leader**

- I will model compliance with this Code of Conduct and other relevant PG&E policies and standards.
- I won’t direct my employees to violate this Code, a law, a regulation or a company policy or procedure.
- I won’t engage in retaliation and will address acts of retaliation if brought to my attention.
- I will listen to and follow up with employees who raise concerns.

As a PG&E employee—

I will comply with the laws, regulations and PG&E requirements that apply to my job.
MAKING ETHICAL DECISIONS

When faced with an ethical dilemma, ask yourself:

- Have I made sure that my actions will not impact anyone’s safety?
- Is it legal?
- Does it feel right?
- Is it consistent with our Code, our Culture and our policies?
- Am I willing to be held accountable for my actions?

Yes

If you answered “yes” to every question, proceed.

No

If you’re not sure, or you answered “no” to any of the questions, don’t proceed.

Ask your leader or another PG&E resource for guidance. For more information, see the section on page 24 for how you can speak up.

Employees who don’t comply with this Code or other company policies, standards or procedures may face disciplinary action, including employment termination. Leaders should contact their HR representative for help determining the appropriate course of action.

An essential component of our safety program is having a learning culture. If a safety violation occurs, our foremost objective is to learn why it happened and take the necessary steps to see that it does not happen again. Our focus is on what failed, not who failed. Only if an employee has acted recklessly, has a pattern of carelessness or noncompliance, or intentionally violates safety rules will disciplinary action be considered.

You will not be disciplined or retaliated against for speaking up and raising a safety concern. When you speak up for safety, you are doing the right thing and you will be positively recognized for doing so. Speaking up strengthens our learning culture and helps to reduce both the frequency and severity of safety incidents.

As a PG&E employee—
I won’t retaliate, threaten retaliation or tolerate retaliation by others.

As a PG&E leader—
I won’t direct my employees to violate this Code, a law, a regulation or a company policy or procedure.
PG&E is a safer, better company when we speak up, listen up and follow up.

Speak Up, Listen Up, Follow Up

When we know about a problem, we can fix it.
SPEAK UP: HOW TO DO IT AND WHY IT MATTERS

At PG&E, we’re committed to fostering a workplace where everyone feels safe to ask for guidance, share ideas or raise concerns—and one where everyone is confident that those concerns will be heard and taken seriously. When we fail to speak up, we lose an opportunity to correct problems before they become more serious, and we lose the ability to make improvements. In short, PG&E is a safer, better company when we speak up, listen up and follow up.

If you encounter activities at work that you believe may constitute misconduct, including unethical behavior, or a violation of applicable laws or regulations, speak up immediately to your leader or other PG&E personnel. Leaders have a duty to act when employees raise issues about safety or misconduct. They are expected to listen, take action and follow up.

What is misconduct?

Misconduct is behavior by a PG&E employee that violates this Code of Conduct or PG&E policies, standards or procedures. It may be willful or intentional, but it may also be an unintentional act or failure to act on the part of the employee. Misconduct is serious and may result in discipline, including termination of employment.

Examples of misconduct include but are not limited to:
- Improper use of drugs or alcohol
- Acts or threats of violence
- Fraud
- Falsification of company records
- Retaliation
- Conflicts of interest
- Inappropriate sharing of company data
- Harassment and discrimination
- Questionable accounting, auditing practices or internal controls
- Violations of the law

All of these examples are considered unethical behavior.

You can feel comfortable raising a concern, sharing ideas or requesting guidance without fear of retaliation; however, sometimes speaking up is easier said than done. Please consider the consequences—to yourself, your coworkers and to the company—if you stay silent. The goal of a speak-up culture is to have an environment where we all feel welcome to express concerns, share new ideas or request guidance. When we know about a problem, we can fix it.
REQUESTING GUIDANCE AND REPORTING CONCERNS

It’s your responsibility to raise concerns about safety, misconduct, or violations of laws, regulations or internal requirements. If you are uncertain about a situation, you have a duty to seek clarification and guidance on interpretations of the Code, safety issues, ethics, compliance and legal issues.

HOW YOU CAN SPEAK UP

You have many ways to speak up to voice a concern. You can contact your immediate leader. If the issue involves your leader or you are uncomfortable with that approach, consider elevating your concern to the next level of management. Know that you are not required to go to a leader. Here are some additional options.

Emergency concerns

If there is a life-threatening or emergency situation, contact 911 and seek emergency care immediately.

If there is workplace violence concern, contact Corporate Security at 1-800-691-0410. If the concern is urgent, contact 911.

Unsafe work practices and process concerns

Contact the Corrective Action Program (CAP) at 1-855-85-GO-CAP to report safety and equipment issues, non-compliance, ineffective or inefficient work processes and procedures, and process improvement ideas. You may remain anonymous if you wish.

Employee conduct and guidance

Contact the Compliance & Ethics (C&E) Helpline 24/7 at 1-888-231-2310 to request guidance or report violations of our Code of Conduct, accounting issues or illegal activity. You may remain anonymous if you wish. The C&E Helpline is an all-purpose resource for raising concerns or seeking guidance. If you are not sure where to turn, the C&E Helpline will determine where to take the issue and provide you with guidance on next steps.

Safety incidents and injuries

If you experience work-related discomfort or an injury that affects your ability to work pain-free, you should call the 24/7 Nurse Report Line at 1-888-449-7787 right away and notify your supervisor. In life-threatening or emergency situations, call 911 and seek emergency care immediately.

PG&E’s Federal Monitor

In addition to the internal speak-up options described above, you may contact PG&E’s Federal Monitor directly to share your concerns through a dedicated toll-free phone number, web portal or email. You can contact PG&E’s Federal Monitor by:

TOLL FREE PHONE: 855-585-0703
WEB: www.intouchwebsite.com/PGEMonitor
EMAIL: PGMonitor@getintouch.com

Please note, these avenues of contacting the Monitor are not equipped to handle safety emergencies or other issues requiring immediate attention.

In addition, Diablo Canyon Power Plant and Humboldt Bay Power Plant employees and contractors may contact the Employee Concerns Program (ECP) Hotline at 805-545-4994 or ECPHotline@pge.com to request guidance or report nuclear safety and nuclear quality concerns.
What is retaliation?

Retaliation is adversely changing an employee’s condition of employment without grounds or for a non-business reason. Examples include threatening an employee for raising a concern or moving their physical location without a legitimate business reason. An employee who speaks up will not be put at any disadvantage by PG&E as a result of his or her report.

GOOD FAITH REPORTING AND OUR POLICY AGAINST RETALIATION

At PG&E, we don’t tolerate retaliation against anyone who raises good faith concerns or has cooperated in an investigation. Employees may not retaliate, threaten retaliation or tolerate retaliation by others. Leaders have a duty to act to address retaliatory actions that come to their attention. Retaliation is harmful to the employee and can have a chilling effect on other employees in raising concerns.

INVESTIGATING REPORTS OF MISCONDUCT AND UNSAFE WORK PRACTICES

PG&E takes reports of misconduct and unsafe work practices seriously. Your role is to ensure allegations and unsafe work practices are brought forward to leaders. You must cooperate with investigations by promptly responding to information requests. Be sure to provide complete and accurate information. Leaders must take action on issues brought to their attention, including reaching out to other resources such as:

- Compliance & Ethics (C&E) Helpline for misconduct issues and guidance on policies
- Corrective Action Program (CAP) for unsafe work practices, non-compliance and process improvements

OUR INVESTIGATION PROCESS FOR MISCONDUCT AND UNSAFE WORK PRACTICES:

1. Intake: An employee raises a potential misconduct allegation or process issue. All issues are assessed to determine the risk level, and the decision to investigate/evaluate is made.

2. Investigate/evaluate: As part of the investigation/evaluation process, a representative conducts interviews and reviews relevant documents.

3. Record and disseminate:
   
   Corrective actions are proposed, and a final report is delivered to the appropriate company representative for resolution.

4. Resolve: The investigation/evaluation is completed, and the findings are reviewed.
   
   - Misconduct allegations: If the misconduct allegation is substantiated, disciplinary action may be taken.
   
   - Unsafe work practice concerns: Action owners address/fix the issue and corrective actions are implemented.

   The case is closed, and the loop is closed with the individual who raised the concern.

5. Track and analyze: The case is evaluated to identify trends.

Read our investigation procedures and discipline policies for more information:

- Employee Conduct Standard (CDT-1004S)
- Internal HR Complaint Investigations Procedure (HR-2030P-01)
- Corporate Security Investigative Procedure (Risk-1101P-01)
- Safety Incident Management Standard (SAFE-1004S)
- Enterprise Causal Evaluation Standard (GOV-6102S)
Building Trust with Each Other

Diversity and inclusion are key to PG&E’s Culture.

PG&E maintains a safe and secure workplace and working environment. We do not tolerate behavior that is offensive or hostile.
Diversity and inclusion are key to PG&E’s Culture, and we strive for a workplace where everyone can bring their unique and varied perspectives and talents. We prohibit discrimination, harassment and retaliation, and we work to ensure our policies, standards and procedures reinforce this Culture.

- **Fair wages**—We are committed to paying fair wages, salaries and benefits.
- **Human rights**—We conduct our business in a manner that respects the human rights of all. We treat our employees with dignity and provide them with safe and humane working conditions.
- **Freely chosen employment**—We do not use or participate in the exploitation of workers or forced or involuntary labor, including human trafficking.

**Child labor**—We do not employ any person under the minimum legal age for employment as prescribed by the relevant local authority, or under the age for completing compulsory education, whichever is greater.

**Anti-discrimination**—We give all employees equal opportunities for jobs, skills training and promotions.

**AS A PG&E EMPLOYEE—**
- I will create a work environment that embraces diversity and inclusion.
- I won’t discriminate, harass or retaliate against any applicant, employee, customer, supplier or non-employee worker.

- **Race, color**
- **Ancestry, national origin**
- **Sex, gender (which includes but is not limited to pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding)**
- **Sexual orientation**
- **Gender identity, gender expression**
- **Transgender status**
- **Age**
- **Religion, religious creed**
- **Physical or mental disability**
- **Protected veteran status**
- **Medical condition**
- **Marital status**
- **Genetic information**
- **Military and veteran status**
- **Citizenship status**
- **Utilization of leaves of absence protected under state or federal law**

See our Equal Employer Opportunity (EEO) and Affirmative Action Policy.

Read our Mothers’ Room Standard (HR-8510S)
HARASSMENT-FREE WORKPLACE

Offensive or hostile behavior is not tolerated. Unwelcome sexual advances, requests for sexual favors and other verbal overtures or physical contact of a sexual nature constitute sexual harassment and will not be tolerated. This policy includes any communication, text, image, data, sound or other information that is inappropriate or contains sexually explicit material. Employees who witness or are experiencing harassing behavior have a duty to speak up and report it.

Read our Standards for a Harassment-Free Workplace Policy.

PG&E does not tolerate harassment of any kind, including sexual harassment.

If you see something, speak up.

CONDUCT OUTSIDE OF WORK

Your conduct away from company property and outside of business hours could have a negative effect on workplace safety, on the company’s reputation and on our ability to serve customers.

PG&E will assess off-duty conduct that is potentially detrimental to the company on a case-by-case basis and determine appropriate action(s).

HEALTH AND SAFETY

VIOLENCE-FREE WORKPLACE

PG&E maintains a safe and secure workplace and working environment. Employees who engage in acts or threats of physical violence, intimidation, harassment, stalking, sabotage or vandalism may be disciplined or terminated from employment.

Weapons

We do not permit weapons in our workplace or on our job sites. Weapons may not be brought, carried, stored or used on property or in vehicles that are PG&E-owned, leased or rented, or in a personal vehicle while being used for PG&E business, unless there is an authorized and legitimate business reason to do so.

What is permitted on PG&E property or job sites?

• Tools used for legitimate PG&E business purposes
• A personal defense product (including pepper spray or electric shock products that do not fire a projectile; firearms are NOT permitted)
• Small pocket knives with a blade length of three inches or less

AS A PG&E EMPLOYEE—

• I won’t bring a weapon onto company property or a job site, a company vehicle or a personal vehicle used for company business unless authorized by Corporate Security.
SECURING OUR PEOPLE, PROPERTY AND ASSETS

PG&E is committed to creating a safe environment and taking care of our assets. All employees must perform their work in a manner that safeguards the public and our customers, employees and company. Doing so is critical for providing safe, reliable, affordable and clean service.

Securing our people
As a member of PG&E’s workforce, you are crucial in the fight against acts of sabotage, crime and terrorism. Your daily duties place you in a position to observe and report such instances as unknown people or packages and open doors or gates on our premises. If you see something, speak up. This is how we improve our safety.

Protecting our technology
As an energy company, we share the responsibility for keeping California’s energy networks running. Securing our technology is integral to carrying out this responsibility. Helping to secure that technology is the personal responsibility of every PG&E employee. Only authorized computers and equipment may be connected to PG&E networks, and only approved, authorized and properly licensed software may be used on PG&E IT assets, including computers, tablets and smart phones. Employees should never click on links or open email attachments unless the email is expected, and they know and trust the sender.

Limited personal use of certain PG&E assets such as personal computers, telephones and mobile phones, fax machines, copy machines and conference rooms is permitted if the use is incidental to business. However, employees should have no expectation of privacy when using them.

Property and other assets
Employees are responsible for the proper acquisition, use, maintenance, protection and disposal of company assets.

What are company assets?
Tangible assets include materials, computers, phones, tablets, tools, real property, vehicles, physical structures, meters and service equipment. Intangible assets include data, information and records concerning PG&E employees, suppliers or customers, and intellectual property and non-public information about PG&E.

As a PG&E employee—
I will be diligent in protecting the company’s technology system.

I will physically secure mobile devices.
I will observe all information security controls and never try to circumvent them.
I will immediately report any suspected or actual breach of PG&E’s computer systems and networks to the Technology Solution Center (TSC) at 415-973-9000.
I will speak up about security concerns, including unknown people or packages and open doors or gates.
I won’t let others tailgate into PG&E facilities and will follow proper badge protocol.
Section 05 | Building Trust with Each Other

AS A PG&E EMPLOYEE—
- I won’t take, misuse or divert any PG&E assets for any reason.
- I will respect limits on personal use of company assets.

Alcohol-free and drug-free workplace
Being under the influence of alcohol or drugs, including recreational and medical marijuana, while working or while on company property is prohibited. Employees may not transport alcohol or drugs in a company-owned, rented or leased vehicle, or a personal vehicle while on company business. In rare circumstances, employees may seek prior consent from a director or above to transport alcohol in a company-owned, rented or leased vehicle.

Authorized use of alcohol
Alcohol is not permitted at company events unless a senior officer provides prior written approval for consuming alcohol for special occasions or certain business meetings. This must be limited and must not violate regulations. Do not operate a company vehicle after consuming alcohol.

If you attend a conference on behalf of PG&E and alcohol is served in the evening at a reception or meal, you may consume alcohol in moderation. However, be mindful that your actions impact PG&E’s reputation, and you may not conduct official business while under the influence of alcohol.

Read PG&E’s Employee Business Expenses and Travel Standard. (FIN-2210S)

AS A PG&E EMPLOYEE—
- I won’t report to work after consuming alcohol, illegal drugs or marijuana (including recreational or medical marijuana).
- I will not transport alcohol or drugs in a company-owned, rented or leased vehicle, or a personal vehicle while on company business.
- I will tell my leader if I am taking any medication that could affect my ability to work safely and efficiently.
- I won’t report to work under the influence of prescription or over-the-counter medications that could impair my ability to work safely and efficiently.
- I won’t consume, possess, display, transport or sell recreational or medical marijuana or illegal drugs while on duty, on PG&E property or in a PG&E vehicle.
- I will comply with PG&E’s alcohol and drug standards and all fitness-for-duty regulations.

FITNESS FOR DUTY
Employees are expected to be mentally and physically fit for duty, and to remain fit while on duty. If your fitness for duty is called into question, you may be subject to a mandatory fitness for duty assessment and/or U.S. Department of Transportation (DOT) or non-DOT Reasonable Suspicion testing.
Accurate records are an essential part of PG&E’s operations. To keep our system safe and reliable, we must always complete and document our work.

Each employee creates records and information and is responsible for managing PG&E records and information to ensure that it is safe, reliable, retrievable, compliant and available during its life cycle.

Company records must be managed and stored in accordance with specific company policies, standards and procedures, which include disposition once retention has been met. Disposition of records is suspended when the Law Department issues a legal hold.

In most situations, visual or audio recordings are not permitted in meetings. If you’ve received prior approval from a senior director or higher to record a business meeting, work with your records management lead to ensure we retain the appropriate records.

What is a record?
Any information created, received and maintained during the course of business to document:
- Specific operational actions
- Commercial transactions
- Contractual obligations
- Formal business decisions
- Legal commitments
- Compliance with legal requirements

Examples of company records
- Maintenance records and inspection documents
- As-built drawings
- Personnel documents
- Reports to government agencies or other public communications
- Workers’ compensation or other benefit-related information, such as dependent eligibility
- Financial reports

Read our Enterprise Records and Information Management Standard. (GOV-7101S)

As a PG&E employee—
I will follow proper record management practices.
What is fraud?
Fraud is intentionally misrepresenting or concealing facts. Fraud can also occur when a person makes intentionally misleading allegations. Examples of fraud may include falsifying documents, misuse of company credit cards, intentionally overcharging customers or changing a family member’s account in our billing system.

Fraud prevention
PG&E is committed to maintaining accurate books, records and financial and non-financial reports. Fraud will not be tolerated.

Business expenses
Misrepresentation of business expenses is also fraud. Use PG&E funds for PG&E business expenses only, whether paying by credit card, cash or another method. No personal use is allowed on PG&E credit cards.

CONFLICTS OF INTEREST
You must not use company property, corporate assets, company information or the influence of your position in a manner that places your personal interests and/or the interests of a competitor before the interests of the company.

What is a conflict of interest?
A conflict of interest occurs when an employee’s private interests interfere, or even appear to interfere, with the interests of PG&E.

Influencing business decisions for personal gain
A potential or actual conflict of interest exists if you influence or try to influence a decision or transaction that could materially affect the value of a financial interest that you hold or that is held by a member of your family or another person with whom you have a close relationship.

Review PG&E’s Conflict of Interest Standard. (CDT-1005S)

AS A PG&E EMPLOYEE:
- I will disclose any potential conflict of interest to my leader.
- If I find myself facing a situation that might be perceived as a conflict of interest, I won’t proceed without a written agreement from my leader or appropriate decision maker.

AS A PG&E EMPLOYEE:
- I will follow proper record management practices.
- I won’t use company funds to make unauthorized or personal purchases.
- I won’t incur unreasonable expenses on behalf of the company.

Read our Employee Business Expenses and Travel Standard. (FIN-2210S)
Gifts and entertainment
If you give or receive a gift in a business setting, it can create a sense or appearance of obligation. PG&E employees, immediate family members, contractors, consultants, those seeking to do business with PG&E and our suppliers are subject to the same rules regarding gifts and entertainment.

Conditions for giving and receiving gifts
To avoid real or perceived obligations, the giving and receiving of gifts by all employees must meet all six conditions below:

1. The total value of all items given or received over a 12-month period must not exceed $100 from a single entity.
2. The item is customary and does not create any appearance of impropriety.
3. The item imposes no sense of obligation on the receiver.
4. The item results in no special or favored treatment.
5. The item could not be considered extravagant, excessive or too frequently given.
6. The item is not concealed in any way.

If you return a gift to the giver within 30 days, or reimburse the giver from personal funds, it is not considered a gift. Customary business meals are not considered gifts.

Favored treatment
We don’t tolerate favored treatment, which is using your position to obtain preferential or advantageous treatment for yourself or your close personal relationships. This includes hiring or promoting employees, selecting contractors or vendors, or participating in investment opportunities to which you’re made privy as an employee of PG&E.

As a PG&E employee—
If I’m in a leadership position, I’ll make personnel decisions based on merit and performance.

What is a gift?
A gift can be anything of value, including items such as:
• A ticket to a sporting event or performance
• A free service (car detail, free parking, etc.)
• A round of golf or bottle of wine

AS A PG&E EMPLOYEE:
• I will treat all fellow employees fairly.
• If I’m in a leadership position, I’ll make personnel decisions based on merit and performance.
• I will disclose close personal relationships to my leader to combat the appearance of favoritism or a conflict of interest.

Refer to the PG&E Corporation Nepotism Policy (HR-01)
If an employee is a guest speaker at a conference hosted by a vendor or other third party, the conference host may pay the employee’s conference registration fee only. PG&E is responsible for paying for the employee’s airfare, lodging, entertainment and other expenses associated with attending the conference. Entertainment could include a round of golf or tickets to sporting events or performances.

If circumstances make it appropriate to accept or give a gift that exceeds the $100 limit, the employee must obtain approval from an officer. The approving officer should send a completed gift exception form to the Compliance and Ethics Helpline mailbox at ComplianceEthicsHelp@pge.com for monitoring and tracking.

Refer to the PG&E Conflict of Interest Standard for the full conditions of giving and receiving gifts and the gift exception form. (CDT-1005S)

Outside employment
You’re not permitted to engage in outside employment or activities such as joining the board of directors of companies that compete with products or services offered by PG&E. Additionally, employees are not permitted to take outside employment that has or could have a negative effect on their ability to do their job at PG&E. If you are, or plan to be, engaged in outside employment or activities, notify your leader and contact Compliance and Ethics for more guidance.

Loans, wage advances or guarantees of obligations
PG&E prohibits loans, wage advances or guarantees of corporate funds to its employees or their friends and family members.

Employees or members of their families must never accept a loan, guarantee, service or payment from a contractor, vendor, consultant or others doing business with PG&E under terms that are not available to the public.

Insider trading
Insider trading is illegal. Never disclose or “tip” inside information to others, or buy and sell securities based on material information you receive as an employee of PG&E.

Refer to the PG&E’s Insider Trading Policy for more information. (CDT-1002S)

What is material information?
Information is “material” if a reasonable investor would consider it important in making an investment decision. Examples include: earnings projections, significant developments in major rate cases or other proceedings, matters before the California Public Utilities Commission, major litigation, changes in dividend policy or senior management, major events regarding PG&E’s securities, mergers and acquisitions, or disposition of significant assets.

What is insider trading?
Insider trading is buying and/or selling stock or other securities—including PG&E Corporation Retirement Savings Plan (the 401(k) plan) or Dividend Reinvestment and Stock Purchase Plan (DRSPP) transactions—while in possession of material non-public information.
As our suppliers are an extension of PG&E, we expect them to adhere to our Culture and put safety first.

We do business honestly, fairly and lawfully.
DOING BUSINESS FAIRLY

We do business honestly, fairly and lawfully. We respect our competitors and do not make inaccurate or derogatory statements about their products or services.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Intellectual property and other confidential information should remain within the company and not be shared with outsiders. Examples of protected information are competitive strategy, costs and financing methods, trade secrets, pricing policy, contract terms, market surveys, and capacity plans and capabilities. If you are authorized by a director or officer to share confidential information outside the company, you must obtain a signed non-disclosure agreement from the third party to whom you disclose the information.

Works created by an employee within the scope of his or her employment are considered the intellectual property of PG&E. Tell your management about inventions and developments that you create within the scope of your employment or with the use of PG&E resources.

Copyright laws make it illegal to copy or reproduce materials without permission of the owner. Examples of copyright-protected materials are books, newspapers, movies, computer software, drawings and musical recordings.

Patents are exclusive rights granted by a government to an inventor to manufacture, use or sell an invention for a certain number of years.

Trademarks are words, symbols, slogans and phrases that distinguish goods and services from others and are used to build brand identity.

Trade secrets include any information used by a business, such as formulas, devices or customer lists that have economic value but are not generally known and for which reasonable efforts have been made to preserve secrecy.

AS A PG&E EMPLOYEE—

• I won’t view confidential information for a non-business reason.
• I won’t use confidential information for personal gain.
• I won’t share confidential information without the appropriate approval.

Copyright laws make it illegal to copy or reproduce materials without permission of the owner. Examples of copyright-protected materials are books, newspapers, movies, computer software, drawings and musical recordings.

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Trade secrets include any information used by a business, such as formulas, devices or customer lists that have economic value but are not generally known and for which reasonable efforts have been made to preserve secrecy.

AS A PG&E EMPLOYEE—

• I will keep PG&E’s intellectual property and trade secrets confidential and will not disclose them to any outside party without prior approval from my director or officer.
• I won’t make unauthorized copies of software licensed to PG&E, load unlicensed software onto PG&E computer equipment or download unauthorized software from the internet.
BRIBERY AND CORRUPTION

PG&E does not tolerate any form of bribery, corruption, extortion or embezzlement and we expect our suppliers to adhere to this same standard. We do not offer or accept bribes, kickbacks, facilitation payments or similar inducements.

Antitrust and other laws, sanctions and controls

PG&E complies fully with all the following:

Antitrust laws were established to promote economic competition among businesses. Activities that limit competition, restrict trade or otherwise dominate a market may violate antitrust laws. Such violations can expose PG&E and individual employees to criminal penalties, fines and civil lawsuits.

Anti-boycott laws make it illegal to participate in any boycott between foreign countries if not sanctioned by U.S. law.

Treasury embargo sanctions prohibit U.S. companies and their foreign subsidiaries from doing business with certain countries, agencies and individuals.

Export and import controls restrict or prohibit the export and import of sensitive goods, technology or software to certain countries or individuals.

Foreign Corrupt Practices Act (FCPA) prohibits giving or offering anything of value to a foreign official, inside or outside the United States, to induce the recipient to misuse his or her official position to obtain or retain business or secure some improper advantage. When you are traveling and working with foreign officials, be careful not to violate FCPA.

Contact the Compliance and Ethics Helpline mailbox at ComplianceEthicsHelp@pge.com with any questions, particularly concerning gifts and meals.

As a PG&E employee—

- I won’t accept or make any offers from/to a supplier that could be viewed as a bribe or unethical payment in expectation of favored treatment.

- I will promptly report any such instance of attempted bribery, corruption or extortion to my leader or the Compliance and Ethics Helpline.

What is a kickback?

A kickback is a “thank you” for favorable treatment under a contract. Examples of kickbacks can include:

- A customer gives an employee a gift card to expedite their service connection
- A vendor thanks an employee for a bid selection by offering them a trip

What is a facilitation payment?

A payment made to a government official to facilitate approval of a business transaction or activity.

What is a bribe?

Money or a favor given or promised to influence the judgment or conduct of another person.
Suppliers are vital to PG&E’s success. Because suppliers are a visible extension of PG&E in our communities, we choose them carefully based on fair and objective criteria. We expect all our non-employee workers, consultants, vendors and other suppliers to behave ethically and comply with applicable laws, regulations and policies, and our Supplier Code of Conduct.

**SUPPLIER CODE OF CONDUCT**

As our suppliers are an extension of PG&E, we expect them to adhere to our Culture and put safety first.

The PG&E Supplier Code of Conduct includes the standards of conduct that suppliers, as well as their employees, subcontractors and sub-suppliers, must follow as they provide goods and services to PG&E. Failure to comply with the expectations covered in the Supplier Code of Conduct could result in termination of an assignment and/or contract.

If you are aware of supplier misconduct or unsafe practices, please speak up by contacting your leader or the Compliance and Ethics Helpline at 1-888-231-2310.

_Read our [Supplier Code of Conduct](#)._

**AS A PG&E EMPLOYEE—**

- I will report suspected supplier misconduct.
- If I am in a leader or managerial role, I will ensure that any suppliers I work with understand and comply with the Supplier Code of Conduct.

**What does the Supplier Code of Conduct cover?**

 Topics include:

- Health and safety
- Environmental leadership
- Supplier diversity
- Labor issues and human rights
- Ethical business conduct
- Conflicts of interest
- Engagement with external parties
- General administrative topics

As a PG&E employee—

I will report suspected supplier misconduct
PG&E serves our communities by protecting and preserving our environment, protecting sensitive information and communicating honestly and openly about our business.

At the center of our Vision is our commitment to a sustainable energy future.
At the center of our Vision is our commitment to a sustainable energy future. This encompasses not only our commitment to clean energy and environmental leadership, but also our fundamental commitment to safety and affordability. Our Vision also affirms our commitment to meeting the challenge of climate change—a key driver for California’s energy policy and a critical priority for our customers.

PG&E serves our communities by protecting and preserving our environment, protecting sensitive information and communicating honestly and openly about our business. We strive to represent ourselves consistently and with integrity. We work in partnership with our communities to improve the quality of life everywhere we serve.

PG&E is committed to environmental leadership and to conducting business in an environmentally sensitive manner. The cornerstone of our environmental policy is strict compliance with all applicable environmental laws and regulations.

We also seek opportunities to exceed current standards of environmental protection, including in the areas of pollution prevention, climate protection, and habitat and species protection. Our annual Corporate Responsibility and Sustainability Report is one way we measure and communicate our progress; we hold ourselves accountable and report on our performance with transparency.

Read our Environmental Policy (ENV-01)

As a PG&E employee—
I will carry out my duties in an environmentally responsible manner.

AS A PG&E EMPLOYEE—
• I will understand the impact of my job on the environment.
• I will carry out my duties in an environmentally responsible manner.
PERSONAL AND SENSITIVE INFORMATION

As part of your job duties, you may have access to personal or sensitive information in digital, hard copy or verbal form. This includes personally identifiable information of PG&E customers, employees or suppliers, such as names, addresses, phone numbers, Social Security numbers or customer energy usage data. You must maintain the confidentiality and privacy of this information, and you may only disclose it with proper authorization or when legally mandated.

What is personally identifiable information (PII)?

Personally identifiable information is any data that could potentially identify a specific individual.

What is protected health information?

Protected health information includes data such as medical conditions or health care coverage.

What is customer and/or employee information?

Customer and/or employee information is any information that, when used alone or combined with other personal or identifying information, can distinguish or reveal the identity of a PG&E employee, or an individual, family or household who is a PG&E customer.

Customer information includes:
- Customer name
- Address

In addition to the items above, employee information includes:
- Phone number
- Social Security number
- Customer energy usage data

As a PG&E employee—
I will respect every customer’s right to privacy and handle customer information with care and diligence.

What is supplier information?

Supplier information includes pricing and contract information.
Customer information
Do not disclose customer information to a third party without the customer’s written authorization unless:
• You are legally required to do so
• The information must be disclosed for PG&E to provide services and ensure appropriate information security protocols are in place

Employee information
Never disclose employee information to another employee, shareholder or a third party without appropriate approval. Forward requests for employee information and references to your Human Resources business partner.

Supplier information
Never disclose supplier information to a third party without appropriate approval and a legitimate business reason. You also must comply with any non-disclosure agreement or confidentiality provisions of a supplier/vendor agreement.

If you have access to personal and sensitive information, you must follow all PG&E standards to ensure that it is appropriately protected and secured. This obligation continues even after you are no longer employed by PG&E.

If you have any questions about using or handling personal and sensitive information, please contact the Law Department.

Read our privacy policies and standards:
- Privacy Policy
- Information Classification and Protection Standard (IT-5302S)
- Customer Privacy Standard (GOV-8001S)

As a PG&E employee—
I will respect every customer’s right to privacy and handle customer information with care and diligence.
I will never view, change, update, manipulate or disseminate my own account or the account of a family member, friend or coworker from our internal system.
I will show respect to fellow employees by treating their information with the same care and diligence I would expect in the handling of my own information.
I won’t access or view sensitive, confidential or personally identifiable information for a non-business reason or for personal gain.
I won’t share sensitive information without appropriate approval.

As a PG&E employee—
I won’t share sensitive information without appropriate approval.
COMMUNICATING WITH CUSTOMERS AND THE PUBLIC

Our communication with customers and the public should be clear, accurate, open and consistent, and should always demonstrate utmost concern for the public’s benefit and safety.

How to respond to inquiries from the media, including during emergencies

If you are contacted by the news media, immediately refer the contact to PG&E Marketing and Communications at 415-973-5930. Do not attempt to improvise an answer, speculate, or downplay the seriousness of the situation. A Marketing and Communications representative is available 24 hours a day, seven days a week to respond to the news media. Marketing and Communications also handles requests for PG&E subject matter experts.

Social media

PG&E respects your right to participate in social media and understands that your time outside of work is your own. Social media used appropriately and effectively can help PG&E build and strengthen relationships with our customers, employees and community members.

PG&E applies these requirements in a manner that does not interfere with or limit employees’ rights under the National Labor Relations Act. Legally protected social media discussions include discussions about wages, hours and working conditions; the right to self-organize, form, join or assist labor organizations; the right to bargain collectively through representatives of your choosing regarding your wages, hours and working conditions; the right to engage in other concerted activities about the same topics or other mutual aid or protection; or to refrain from engaging in such activities.

How does PG&E define social media?

Social media includes:
• All types of posts and other communications on the internet
• Posts on social networking sites, such as Facebook, Twitter and LinkedIn
• Video or audio posted to media-sharing sites, such as YouTube or Instagram

Read the Employee Social Media Standard. (CDT-1003S)
AS A PG&E EMPLOYEE—

- I will use social media responsibly to balance the benefits and risks to PG&E and to me personally.
- I will use my personal email account (not my PG&E email) and my personal device(s) when setting up or participating in external social media channels.
- I will adhere to copyright and fair use laws.
- I won’t represent in any social media content that I am authorized to speak on behalf of PG&E without prior written approval from Marketing and Communications.

Review our brand guidelines at www.pgebrandguidelines.com (Login: pgebrand, Password: onepge); contact brandguidelines@pge.com with questions.

Read the Charitable Contributions Standard. (CR-5002S)

CORPORATE PRESENTATIONS, IDENTITY AND LOGO USE

PG&E is committed to fair and truthful advertising practices. PG&E Corporation owns the trademarks that incorporate “PG&E” and the holding company and utility corporate names. You may use the corporate names and logos, the PG&E logo and PG&E colors in presentations to public audiences in compliance with the standards issued by Marketing and Communications. When creating presentations or other materials, do not use copyright-protected images; some stock and company imagery is available for your use on the brand guidelines website.

Endorsements

PG&E does not endorse products or services, or the firms or individuals who supply them. Favoritism must not be implied by testimonials or endorsements. If you want to provide a personal testimonial or endorse an event, product or service, do not use your job title or affiliation. If you have questions about endorsements, please contact the Compliance and Ethics Helpline. Any exceptions must be approved by Marketing and Communications.

Contractor representation

Under no circumstances are contractors permitted to represent themselves to the media as speaking on behalf of PG&E, unless they are expressly authorized to do so by Marketing and Communications.

Publishing material to external sources

If you plan to publish material about your job responsibilities or work, get approval from your leader and Marketing and Communications before publication.

Donations

Community Relations must review in advance all cash and in-kind contributions made in PG&E’s name to 501(c) nonprofit organizations, public schools and governmental entities. We serve our community through employee volunteerism and partnering locally to enrich educational opportunities, preserve our environment and support the safety and vitality of our communities.
PG&E is committed to complying with all federal, state and local laws, rules and regulations.

Employees must comply with all requirements related to government business.
PG&E is committed to complying with all federal, state and local laws, rules and regulations. We expect employees to meet all legal and regulatory requirements imposed by all governmental bodies that regulate our business. We are also fully committed to abiding by all laws governing interactions between the company and various governmental bodies. We respond appropriately to all government inquiries and investigations.

PARTICIPATING IN THE POLITICAL PROCESS

PG&E encourages employees to be informed voters and become involved in the political process. As an employee you must make it clear that any contributions you make, views you may express or activities you undertake are your own and not those of PG&E. If you choose to contribute or participate, your contributions must be on a personal basis, using your own time and funds. Participation in company-approved political action committees is voluntary.

PG&E will not reimburse you for any contribution of money donated or time spent by you on that activity.

Serving in federal, state or local government

If you seek election or appointment to a public office while employed by PG&E, contact the California External Affairs Political Resources & Compliance team to discuss potential conflicts of interest and how those issues should be addressed.

INTERACTING WITH PUBLIC OFFICIALS

The California Public Utilities Commission, Federal Energy Regulatory Commission and other state and federal agencies have rules that restrict and require disclosure of certain communications with decision makers about issues in proceedings before those agencies. All communications with regulatory personnel must also be truthful and accurate. Ex parte communications, in particular, are strictly regulated.

When engaging in communications with regulatory agencies, PG&E employees and agents are expected to seek guidance from the Law Department or Regulatory Affairs and follow PG&E policies and standards.

Read our ex parte policies, standards and procedures:
- Ex Parte CPUC Communications Procedure (CR-2001P-06)
- Ex Parte CPUC Communications Regarding 2015 Gas Transmission and Storage (GT&S) Rate Case Procedure (CR-2001P-07)
- FERC Ex Parte Communication Prohibition Standard (Risk-4004S)

What denotes a public official?

A public official is any government employee or representative, including elected or appointed officials in foreign, federal, state and local governments, regulatory commissions and other oversight agencies.

What is an ex parte communication?

An ex parte communication is a communication between a decision maker and an interested person concerning an issue in a formal proceeding that does not occur on the record. Ex parte communications can occur when information is not shared in a public forum or is kept out of the record of the proceeding.
We are proud to provide services to the United States federal government and state and local government entities. As a federal contractor, we must comply with a number of laws, regulations and contractual requirements that are unique. Many of these requirements are different from and more restrictive than requirements in the commercial marketplace.

Employees must comply with all requirements related to government business:

- We always act with integrity and communicate honestly.
- Fraudulent or dishonest acts in fulfilling a government contract can trigger severe penalties under the False Claims Act, including fines and jail sentences.
- This includes making false statements or representations, submitting false claims or charging for hours not worked.

An example of these restrictive requirements is when certain government officials visit, we may not be able to provide them with common business courtesies, like a bottle of water or a meal.

As a federal contractor, Pacific Gas and Electric Company has certain obligations that we must meet. Many of our existing policies meet U.S. government standards, including a zero-tolerance policy on human trafficking, procuring commercial sex acts and using forced labor.

Any employee who violates this policy shall be subject to disciplinary action including, but not limited to, reduction in benefits or termination of employment. These policies apply to consultants, contractors and subcontractors working with or for Pacific Gas and Electric Company. As these are also government policies, the government may remove us from a contract if we violate these provisions. Government contracts may also have other special provisions and reporting requirements.

Political contributions and gifting

The rules surrounding providing gifts and meals to federal government officers, officials and employees are stricter than PG&E’s gift policy. Contact the California External Affairs Political Resources & Compliance team to receive advance approval for all contributions (monetary and in-kind) or gifts (including food and drink) made to government officers, officials or employees on behalf of PG&E.

Be aware of those special provisions and immediately contact the Compliance and Ethics Department if any questions arise.

For more information, refer to our Federal Government Contracts Compliance Standard. (GOV-1028S)
Lobbying
Direct lobbying or similar political activity on behalf of the company may be done only by employees who are properly registered and who are specifically approved by California External Affairs and/or Federal Affairs. Contact the Political Resources & Compliance team with any questions.

Disclosures and public communications
PG&E Corporation and Pacific Gas and Electric Company must comply with federal laws and regulations that require the disclosure of certain information related to Securities and Exchange Commission (SEC) filings. If you are asked to review a draft SEC report, respond promptly to help ensure that the SEC reports, other public disclosures, and the information contained within, are full, fair, timely, accurate, understandable and complete.

As a PG&E employee—
- I will understand the laws and regulations applicable to my job, including specific rules related to government contracting or interacting with governmental bodies.

As a federal contractor, we must comply with a number of laws, regulations and contractual requirements that are unique.
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The most up-to-date version of this Code of Conduct can be found online at pgeweb/compliance/pages/codeofconduct.aspx

In the Code of Conduct, the term “PG&E” refers to PG&E Corporation and its affiliates and subsidiaries, including Pacific Gas and Electric Company. The conduct, conflict of interest and compliance standards in this code apply to all employees and officers of PG&E.