

*Living our Mission,
Vision and Culture*

Employee Code of Conduct

February 2021



Welcome to the

Employee Code of Conduct

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Our Mission, Vision and Culture form the foundation for our standards of ethics and compliance. The Employee Code of Conduct helps to ensure that all of us understand the expectations and requirements for which we are accountable.

Foreword



A MESSAGE FROM PATTI POPPE

PG&E Team,

Every day, in every action we take, we have the opportunity and responsibility to rebuild trust with the customers we serve, our regulators and our coworkers.

PG&E's Employee Code of Conduct outlines the company's expectations and requirements for all of us in meeting that responsibility, and I ask that you take time to read it, understand it and practice it every day in your role.



[See Patti's video](#)

Our customers are counting on us to not only deliver the services that power and enable their lives, but also to do our work the right way, which means adhering to our Code of Conduct and meeting both the letter and spirit of our compliance requirements.

If you ever have concerns about safety, possible misconduct or potential violations of laws, regulations or internal requirements, talk to your leader

“Join me in following the Employee Code of Conduct and demonstrating, through our actions, that we are making a difference and worthy of our customers’ trust.”

immediately or contact any of the resources listed on the Code of Conduct mobile app or [intranet page](#).

I want every one of you to feel safe in speaking up about your ideas and concerns, and to know that PG&E's leadership team is committed to listening up and following up. PG&E does not tolerate retaliation for speaking up or participating in an investigation.

We can never waver in our commitment to doing the right thing, every time. Join me in following the Employee Code of Conduct and demonstrating, through our actions, that we are making a difference and worthy of our customers' trust.

PATTI POPPE
Chief Executive Officer
PG&E Corporation



Adhering to our Code of Conduct is critical to carrying out our Mission, achieving our Vision and living our Culture.

Employee Code of Conduct

Your guide to compliance and ethics.



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 Employee 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 PG&E’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
- Complying with applicable laws, regulations, our Code and PG&E requirements
- 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
- Treating one another and our customers in a respectful manner

Responsibilities of PG&E Leaders

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

- Building trust and creating an environment that makes it safe for employees to speak up to share ideas and concerns
- Recognizing and meeting our commitments with the appropriate degree of urgency
- Encouraging employees to raise issues
- Not engaging in retaliation against those who speak up
- Listening up and following up with employees who raise issues about safety, violations of laws or regulations, or this Code of Conduct
- Openly acknowledging when we are wrong or don’t know the answer, and seeking guidance if unsure of the appropriate course of action
- Escalating and reporting suspected violations of this Code, whether by employees or PG&E’s suppliers or business partners, to the Compliance & Ethics Helpline
- Being an ethical role model—making compliance and ethics a cornerstone of our work
- Making personnel decisions based on merit and performance



AS A PG&E EMPLOYEE—

- I will comply with the laws, regulations and PG&E requirements that apply to my job.
- I will act with integrity.
- I will speak up promptly about possible misconduct, safety issues or new ideas.
- I won't retaliate or threaten retaliation.

AS A PG&E LEADER—

- I will comply 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 will listen to and follow up with employees who raise concerns and escalate appropriately.
- I will promptly report suspected violations of this Code to the Compliance & Ethics Helpline when brought to my attention.
- I won't engage in retaliation or tolerate retaliation if I observe it against another employee.

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.

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 **How You Can Speak Up** section.

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

If a safety violation occurs, our foremost objective is to learn why it happened and take the necessary steps to put controls in place to prevent recurrence. Disciplinary action will be considered only if an employee

has acted recklessly, has a pattern of carelessness or noncompliance, or intentionally violates safety rules or other PG&E policies.

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. Speaking up helps to reduce both the frequency and severity of safety incidents.

**As a PG&E employee—
I won't retaliate or threaten
retaliation.**



Section 04

PG&E is a safer, better enterprise 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 know about a problem, we can fix it. In short, PG&E is a safer, better enterprise 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, Human Resources or the Compliance & Ethics (C&E) Helpline. Leaders have a duty to act when employees raise issues about safety or misconduct. They are expected to listen, take action and follow up.

PG&E takes fraud, bribery, corruption and other misconduct seriously, and employees and suppliers who commit misconduct will be held accountable for their actions. Employees who engage in this type of misconduct are subject to discipline or termination of employment, and may also face criminal prosecution.

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 PG&E—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.

What is misconduct?

Misconduct is behavior that violates this Code of Conduct, PG&E policies, standards or procedures, or laws or regulations. It may be willful or intentional, but it may also be an unintentional act. Misconduct is serious and may result in discipline or termination of employment.

Examples of misconduct include but are not limited to:

- Improper use of drugs or alcohol
- Acts or threats of violence
- Fraud
- Bribery or corruption

- Unethical conduct
- Falsification of company records, including time sheets and expense reports
- Retaliation
- Conflicts of interest
- Inappropriate sharing of company data
- Harassment and discrimination
- Failure to comply with accounting procedures or practices, such as by submitting or approving false or misleading information

See our **Employee Conduct Standard (CDT-1004S)**.



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. We all have a responsibility to identify and internally report potential safety and operational issues (you can read about this in more detail in the Building Trust with Governments section of this Code).

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

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.

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**.

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.

Employee conduct and guidance

Contact the **C&E Helpline 24/7** at **1-888-231-2310**, www.pgecorp.ethicspoint.com or ComplianceEthicsHelp@pge.com 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.

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.

Safety incidents and injuries

If you experience a work-related illness or injury, including any injury that affects your ability to work pain-free, you should call the **24/7 Nurse Care 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 Pacific Gas and Electric Company's Federal Monitor directly to share your concerns through a dedicated phone number, website or email.

PHONE:
1-855-585-0703

WEB:
www.intouchwebsite.com/PGEMonitor

EMAIL:
PGEMonitor@getintouch.com

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



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 or threaten retaliation. Leaders may not tolerate retaliation that they observe against another employee, and have a duty to act to report retaliatory actions that come to their attention. Retaliation is harmful and can have a chilling effect on other employees in raising concerns.

What is retaliation?

Retaliation is adversely changing an employee's condition of employment 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 in good faith will not be put at any disadvantage by PG&E as a result of his or her report.

INVESTIGATING REPORTS OF MISCONDUCT AND UNSAFE WORK PRACTICES

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

- C&E Helpline for misconduct issues and guidance on policies
- CAP for unsafe work practices, non-compliance and process improvements

OUR MISCONDUCT INVESTIGATIONS PROCESS:

1. Report: An employee, non-employee worker or customer raises a potential misconduct allegation to their leader, Human Resources or the C&E Helpline.

2. Assign: Compliance & Ethics reviews the report and determines the appropriate next step, which in many cases will include an investigation. The investigation may be conducted by PG&E resources, including Human Resources or Corporate Security, or by outside investigators. If no investigation is needed, move to step 5.

3. Investigate: The internal or external investigator begins an investigation, if warranted. This may include interviews and/or a review of relevant documents, data or materials.

4. Record: The investigator documents the findings. When misconduct is substantiated, a report is distributed to the appropriate PG&E leaders and recorded in PG&E's case management system.

5. Resolve: Human Resources and the Line of Business work together to determine the appropriate next steps, which may include training, policy modification, disciplinary action or termination of employment. The investigator or contracted

agency notifies the employee, non-employee worker or customer who raised the concern that the investigation has been concluded.

6. Track and analyze: Compliance & Ethics tracks, analyzes and provides guidance to lines of business and PG&E leadership on trends and issues.

For more information, read our **Employee Conduct Standard (CDT-1004S)**

OUR UNSAFE WORK PRACTICE INVESTIGATIONS PROCESS:

To learn more about the CAP process, read these standards:

- **Safety Incident Notification and Response Management Standard (SAFE-1004S)**
- **Enterprise Cause Evaluation Standard (GOV-6102S)**



PG&E maintains a safe and secure workplace and working environment. We do not tolerate behavior that is offensive or hostile.

Building Trust with Each Other

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



EQUAL EMPLOYMENT OPPORTUNITY

Diversity and inclusion are key to PG&E’s Culture, and we strive for a workplace that respects individual differences, perspectives and talents. We prohibit discrimination, harassment, abusive conduct, bullying 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.

What are the individual characteristics or actions protected from discrimination and harassment?

- Race, color
 - Ancestry, national origin
 - Sex (including pregnancy, childbirth, breastfeeding, or related medical conditions)
 - Sexual orientation
 - Gender, gender identity, gender expression, sex stereotyping
 - Transgender status
 - Age
 - Religion, religious creed
 - Physical or mental disability
 - Medical condition
 - Marital status
 - Genetic information
 - Military and veteran status
 - Citizenship
 - Protected medical leaves
 - Domestic violence victim status
 - Political affiliation
 - Any other status protected by federal, state or local laws or any other non-job related factor
- See our **Equal Employment Opportunity and Affirmative Action Policy**.
- Read our **Mothers’ Room Standard (SAFE-2105S)**.



HARASSMENT-FREE WORKPLACE

PG&E does not tolerate harassment of any kind, including sexual harassment. This policy includes any communication, text, image, data, sound, social media post or other information that is inappropriate, offensive or contains sexually explicit material. Employees who witness or are experiencing harassing behavior have a duty to speak up and report it. Employees who engage in harassment will face disciplinary action or termination of employment.

Read our [**Policy for a Harassment, Discrimination and Retaliation-Free Workplace.**](#)

What is harassment?

- Bullying
- Hazing
- Offensive or hostile behavior or other verbal, written or electronic communication that singles out an employee on the basis of a protected characteristic
- Behavior that unreasonably targets another employee
- Conduct that creates an intimidating work environment
- Conduct that interferes with an employee's ability to do the job
- Sexual harassment (unwelcome sexual advances, requests for sexual favors, or other verbal, written or electronic overtures or physical contact of a sexual nature)

CONDUCT OUTSIDE OF WORK

Your conduct away from company property and outside of business hours could have a negative effect on your coworkers, the public, workplace safety, on PG&E's reputation and on our ability to serve customers. Conduct outside of work includes social media posts brought to the company's attention that violate the Employee Code of Conduct.

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

PG&E does not tolerate harassment of any kind.
If you see something, speak up.



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, our customers, employees and PG&E. Doing so is critical for providing safe, reliable, affordable and clean energy.

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 provider, 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 and applications may be used on PG&E IT assets, including computers, tablets and smartphones. Employees should never click on links or open email attachments unless the email is expected, and they know and trust the sender. Employees should never transfer restricted or confidential company data or personal information to a personal computer, phone or other device. This includes emailing information to a personal email account.



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, PG&E assets are subject to monitoring and review, and employees should have no expectation of privacy when using them.

Employees who are issued company-owned devices, such as smartphones, should conduct company business on that device, not on their personal devices.

AS A PG&E EMPLOYEE—

- I will be diligent in protecting PG&E'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.
- I won't take misuse or divert any PG&E assets for any reason.
- I will respect limits on personal use of company assets.

What are company assets?

Does PG&E own it? If the answer is yes, it's a company asset.

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 PG&E's technology system.



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.

Alcohol-free and drug-free workplace

Working under the influence of alcohol or drugs, including recreational and medical marijuana, is prohibited. This includes working remotely, on company property or at a jobsite. Employees may not transport alcohol or drugs in a company-owned, rented or leased vehicle, or a personal vehicle while on company business. Violation of company policies regarding alcohol and drugs will result in disciplinary action or termination of employment.

Authorized use of alcohol

In rare circumstances, employees may seek and obtain prior consent

from a director or officer to transport alcohol in a company-owned, rented or leased vehicle. 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. Also, you may not drive a company-owned, rented or leased vehicle or a rental vehicle after consuming alcohol at an event.

Read [PG&E's Employee Business Expenses and Travel Standard \(FIN-2210S\)](#)

AS A PG&E EMPLOYEE—

- I won't report to work under the influence of alcohol, illegal drugs or marijuana.
- I won't consume, possess, display, transport or sell alcohol, recreational or medical marijuana or illegal drugs while on duty, on PG&E property or a jobsite, in a PG&E vehicle, or in 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 will comply with PG&E's alcohol and drug standards and all fitness-for-duty regulations.



ACCURATE DATA, RECORDS AND REPORTING

ACCURATE DATA

Capturing and managing data effectively is critical for PG&E's operations.

Data management is a business-driven, enterprise-wide, shared responsibility that covers the full lifecycle of data. It includes the creation, storage, access, controls, governance, quality, meta-data, usage, analysis, security, retention and disposal of data.

Read our [Enterprise Data Management Policy](#). (GOV-09)

As a PG&E employee—I will follow proper record management practices.

What is data?

Data refers to the raw facts or figures that form the building blocks of information.

How is data different than information or a record?

Data are raw, unorganized facts that need to be processed.

Information is a collection of data that has been given value through analysis, interpretations or compilations in a meaningful form.

Information may be deemed a record or a non-record. Information, regardless of format, that documents business actions, transactions, decisions, and/or contractual, legal, or regulatory obligations are defined as **records**.

ACCURATE RECORDS

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. We are all responsible for managing PG&E records and information to verify they are complete, accurate, reliable, secure and available throughout their lifecycle.

Company records must be managed and stored in accordance with specific company policies, standards and procedures, including the Enterprise Records Retention Schedule. The schedule lets employees know how long records need to be retained.

Some company records may contain personal information or personal health information. See the Personal Information section

for more details. These should only be accessed by employees with a business need to know and should be stored according to PG&E requirements for storage of confidential or restricted information.

Disposition is the final action taken at the end of the retention requirement, which can include destruction, transfer to a third party or archiving. In the event of a legal hold issued by the Law Department, disposition of records and information may be suspended.

Read our [Enterprise Records and Information Management Standard](#) (GOV-7101S) and [Electronic Communication Retention Standard](#). (GOV-7115S)

For guidance on recording meetings, read the [PG&E Recording of Meetings Standard](#). (GOV-7116S)



What is a record?

Any information, regardless of format, that is created, received and maintained which documents:

- Business and operational actions
- Commercial transactions
- Contractual obligations
- Formal business decisions
- Legal and regulatory obligations

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
- Payroll records, including timecards

What is fraud?

Fraud is an intentional, deceitful act, committed to obtain some illegal or unfair gain or advantage.

There are numerous types of fraud. For example, fraud can occur when a person misrepresents or conceals facts, or makes intentionally misleading allegations. Some additional examples of fraud may include falsifying documents, misuse of company credit cards, splitting invoices or expense reports to avoid approval thresholds, intentionally overcharging customers or changing a family member's account in our billing system.

Employees who engage in this type of misconduct—or who assist suppliers in this type of misconduct—are subject to discipline or termination of employment, and may also face criminal prosecution.

Fraud also includes falsifying work hours. Employees are responsible for the accuracy of their own work time submissions, even if timecards are completed by others.

Review your claimed work times to confirm accuracy before you submit them into the timekeeping system.

For guidance on timecards, read our [Time Reporting Standard](#). (HR-1250S)

Fraud prevention and internal accounting controls

PG&E is committed to maintaining accurate books, records and accurate financial and non-financial reporting. PG&E actively monitors for many types of fraud and continues to put controls in place to detect fraudulent activity. Fraud will not be tolerated, and leaders may not direct their employees to commit fraud on their behalf.

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.

Read our [Employee Business Expenses and Travel Standard](#). (FIN-2210S)

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.

Business expenses must be:

- Reasonable
- Prudent
- Actual
- Necessary
- Incurred while on PG&E business



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.

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.

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 Conflicts of Interest Standard](#). (CDT-1005S)

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 suppliers, or participating in investment or other opportunities to which you're made privy as an employee of PG&E.

Refer to the [PG&E Corporation Nepotism Policy](#). (HR-01)

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.

As a PG&E employee—
I will treat all fellow employees fairly.



Gifts

We protect our ability to make business decisions free of undue influence. If you give or receive a gift in a business setting, it can create a sense or appearance of obligation that taints neutral decision-making. That's why PG&E has very specific standards about what you may receive from suppliers, business contacts and customers.

Starting June 1, 2021, we have a new gift policy: We may not offer or accept gifts of any value, other than items of no intrinsic value. Items of no intrinsic value include promotional items, such as a pen or keychain with a logo, valued at \$15 or less. PG&E employees, immediate family members, contractors, consultants, those seeking to do business with PG&E and our suppliers are all subject to the same rules regarding gifts.

- **Check our standard**—Before you accept or reject, go or don't go – know what's permitted in the **Conflicts of Interest Standard** (CDT-1005S).
- **If you're not sure, ask**—If the right course of action is not clear after consulting the standard, seek guidance from your supervisor or the C&E Helpline at **ComplianceEthicsHelp@pge.com**.

Return gifts which violate this policy to the giver with an explanation of our no gift standard. If you return a gift to the giver within 30 days, or reimburse the giver from personal funds, it is not considered a gift.

The rules surrounding providing items of value to federal, state and local government officers, officials and employees may be more restrictive than PG&E's gift policy.

Refer to our **Conflicts of Interest Standard** (CDT-1005S) for more guidance.

What is a gift?

A gift can be anything of value, including items such as:

- A ticket to a sporting event, concert, play or other entertainment event
- A round of golf
- A non-business meal
- A bottle of wine
- A free service (car detail, free parking, etc.)
- A special discount not available to all employees
- An all-expenses-paid trip to a conference or trade show
- A ticket to a charitable or fundraising event given to a PG&E employee by a third-party
- Perishable food items, such as a fruit basket or box of chocolates
- Cash
- Tips or gratuities
- Gift cards

What is a supplier?

An individual or company that does, or is actively seeking to do, business with PG&E.



A supplier sent me a supplier-branded highlighter. What should I do with it?

Keep it. It is OK to accept an item of no intrinsic value, such as a promotional highlighter, pen or keychain with a logo valued at \$15 or less.

A supplier sent me a bottle of wine as a holiday gift. What should I do with it?

Return the bottle of wine to the supplier with an explanation of our no gift standard.

AS A PG&E EMPLOYEE—

- I won't accept or give gifts.
- I will ask my leader or Compliance and Ethics if I have questions about gifts.
- I will check with my leader if I plan to pursue outside employment opportunities.

Customary business meals and conference attendance

Customary business meals are not considered gifts. These are routine meals that are similar in cost to PG&E employees' meals when they travel for business.

If an employee is a guest speaker at a conference hosted by a supplier or other third party, the conference host may pay the employee's conference registration fee. PG&E is responsible for paying for the employee's airfare, lodging, entertainment and other expenses associated with attending the conference.

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 or which otherwise could create a conflict of interest. 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, supplier, 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/or sell securities based on material information you receive as an employee of PG&E.

Refer to **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 financial results, earnings projections, significant developments in major rate cases or other proceedings, matters before the California Public Utilities Commission, significant cybersecurity issues, 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) 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.

Building Trust with Our Business Contacts

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 PG&E 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 PG&E, 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.

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.

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 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, employees and contractors to adhere to this same standard. We neither offer nor accept bribes, kickbacks, facilitation payments or any other similar inducements.

Bribery and corruption have a negative effect on PG&E's reputation. Employees who engage in this type of misconduct are subject to discipline or termination of employment, and may also face criminal prosecution.

The Foreign Corrupt Practices Act (FCPA) prohibits giving or offering anything of value to a foreign official, inside or outside the United States, to influence or induce the recipient to misuse his or her official position to obtain or retain business or secure an improper advantage. When you are traveling

and working with foreign officials, be careful not to violate the FCPA. Contact the C&E Helpline at ComplianceEthicsHelp@pge.com with any questions, particularly concerning gifts and meals.

Read the **Foreign Corrupt Practices Act Standard**. (CDT-1006S)

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 otherwise 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 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.

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 C&E 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.



WHO WE WORK WITH AND WHY

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 and 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 is the standard of conduct that all 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, and may also result in criminal prosecution.

If you are aware of any supplier misconduct or unsafe practices, please speak up by contacting your leader or the C&E 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 third parties
- General administrative topics

**As a PG&E employee—
I will report suspected
supplier misconduct.**



Section 07

PG&E serves our communities by protecting and preserving our environment, protecting sensitive information and communicating honestly and openly about our business.

Building Trust with Our Communities and Customers

At the center of our Vision is our commitment to a sustainable energy future.



PRESERVING OUR ENVIRONMENT

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

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.

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.



PERSONAL INFORMATION

As part of your job duties, you may have access to personal information in digital, hard copy or verbal form. This includes the personal information of PG&E customers, employees or suppliers. You must maintain the confidentiality and privacy of this information, and you may only access or disclose it with proper authorization or when legally mandated.

What is personal information?

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

What is protected health information?

Protected health information includes personal data about medical conditions, medical treatment, medical history, occupational injuries or health care coverage.

As a PG&E employee—

I will respect every customer's right to privacy and handle customer information with care and diligence.

What is customer and/or employee personal information?

Personal information is any information that, when used alone or combined with other information, can distinguish or reveal the identity of a PG&E employee, customer, stakeholder, or any other California resident.

Examples of customer personal information include:

- Customer name
- Address
- Phone number
- Social Security number
- Customer energy-usage data
- Online username, password and IP address

In addition to these items, examples of employee personal information include:

- Salary and benefits information
- Health information
- Photographs
- Performance evaluations

For a more comprehensive list, review the [Information Classification and Protection Standard. \(IT-5302S\)](#)

What is supplier information?

Supplier information includes pricing and contract information.

As a PG&E employee—

If I am unsure how to collect, access or protect personal information, I will reach out to the Privacy team at pgeprivacy@pge.com.



Customer personal information

Do not disclose customer personal information to a third party without the customer's written authorization unless you are legally required to do so or the information must be disclosed in order for PG&E to provide services. You also must ensure appropriate contractual privacy and security protocols are in place.

Employee personal information

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

Supplier information

Never disclose supplier personal information or other information subject to confidentiality provisions 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 agreement.

If you have access to personal 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, handling or disclosing personal and sensitive information, please contact pgeprivacy@pge.com.

Read our privacy policies and standards:

- [PG&E Privacy Policy](#)
- [Privacy Policy \(GOV-08\)](#)
- [Employee, Job Applicant and Contractor Privacy Notice](#)
- [Information Classification and Protection Standard \(IT-5302S\)](#)
- [Privacy Standard \(GOV-8001S\)](#)

AS A PG&E EMPLOYEE—

- I will respect every individual's right to privacy and handle personal 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 personal information for a non-business reason or for personal gain.
- I won't share personal 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.

Social media activity brought to PG&E's attention that violates PG&E's Code of Conduct will be reviewed for potential disciplinary action or termination of employment. PG&E will assess social media activity on a case-by-case basis and determine appropriate action(s). The assessment will include whether the activity includes threats or allusions to violence

and/or offensive content (e.g. hate speech) and whether it could reasonably lead to reluctance on the part of other employees or customers to work with the employee.

PG&E applies the requirements in this Code of Conduct 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.

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.

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

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 C&E Helpline. Any exceptions must be approved 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.

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



PG&E is committed to complying with all federal, state and local laws, rules and regulations.

Building Trust with Governments

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 PG&E and various governmental bodies. We respond appropriately to all government inquiries and investigations.

ENHANCED OVERSIGHT AND ENFORCEMENT PROCESS

The Enhanced Oversight and Enforcement Process is designed to make sure that PG&E meets key safety and operational commitments to better serve our customers and communities.

Reporting systemic safety issues for gas, electric or generation to the CPUC is a key component of the process. The focus is preventative — tracking our progress and performance to identify issues early, before they become a problem, and to correct any issues promptly if they arise.

The process was established by the CPUC and outlines escalating CPUC oversight and enforcement measures in the event of PG&E's failure to comply with safety and operational requirements. In the most extreme case, if PG&E fails to comply, the CPUC will review and possibly revoke our license to serve our customers.

Read the [Enhanced Oversight and Enforcement Process Policy](#). (GOV-11)

What is the Enhanced Oversight and Enforcement Process?

The Enhanced Oversight and Enforcement Process is a process that promotes meeting our safety and operational commitments by promptly identifying, reporting and correcting issues to better serve our customers and become an operationally excellent company.

What is my role in the Enhanced Oversight and Enforcement Process?

It is critical that we work with integrity, meet our compliance commitments and protect public, employee and contractor safety. That means doing your day-to-day job well and following all regulatory and internal requirements.

The Enhanced Oversight and Enforcement Process also underscores the need for continuing to speak up, listen up and follow up. **If you see something that doesn't feel right, speak up.** Help to identify potential safety and operational issues early so that we can address them. We need everyone's engagement to stay safe and compliant. This will help us improve our safety and operational outcomes and enable us to serve our customers better. Report safety issues to the **Corrective Action Program (CAP)**, or contact enhancedoversightquestions@pge.com.



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 PoliticalCompliance@pge.com to seek guidance regarding 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 (see definition below), 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 CPUC Communications Procedure. \(CR-2001P-06\)](#)

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.



DOING BUSINESS WITH THE GOVERNMENT

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.

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.

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.

As a federal contractor, Pacific Gas and Electric Company has certain obligations that we must meet. 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 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.

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 Contract Compliance Program Charter. (GOV-10285)**

Political contributions and gifting

The rules surrounding providing items of value to federal, state and local government officers, officials and employees may be more restrictive than PG&E's gift policy. Contact the State and Regulatory Affairs Compliance, Risk and Operations team to receive advance approval for all contributions (monetary and in-kind) or gifts (including food and beverages) made to government officers, officials or employees on behalf of PG&E.

Lobbying

Direct lobbying or similar political activity on behalf of PG&E may be done only by employees who are properly registered and who are specifically approved by State and Regulatory Affairs and/or Federal Affairs. Contact PoliticalCompliance@pge.com with any questions.

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.

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 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 <http://www.pgecorp.com/corp/about-us/corporate-governance/corporation-policies/employee-conduct.page>

For questions or guidance on the Employee Code of Conduct, contact the Compliance & Ethics Helpline at 1-888-231-2310, www.pgecorp.ethicspoint.com or ComplianceEthicsHelp@pge.com.

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.

