

	CORPORATE COMPLIANCE	
Policies for Ethical Conduct	Policy Number:	700
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Policies for Ethical Conduct



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PURPOSE

The purpose of the Policies for Ethical Conduct (“Policies”) is to set forth standard expectations of conduct for Company Personnel in support of the Company’s commitment to conduct its business in accordance with the highest standards of business and common sense ethics.

SCOPE

These Policies apply to all Personnel of Duquesne Light Holdings, Inc. and its business subsidiaries (collectively, the “Company”).

POLICY STATEMENT

It is the policy of the Company to conduct its business in accordance with all applicable laws, rules, regulations and the highest ethical standards. Accordingly, it is the responsibility of all Company Personnel to read, understand and adhere to the Company’s Policies for Ethical Conduct and all other Company policies at all times in carrying out their responsibilities of the business activities of the Company.

The Company is committed to complying with the laws, rules and regulations governing its activities and each of us must be familiar with those that apply to our individual jobs and work assignments. Compliance with the law, however, is just the beginning of ethical conduct.

These Policies demonstrate the Company’s commitment to maintaining the highest standards of business and common sense ethics, providing a work environment that is respectful, and conducting itself in accordance with applicable laws, rules and regulations. All Company Personnel must conduct themselves in a manner consistent with these Policies and in a manner that avoids impropriety or the appearance of impropriety.

These Policies set forth many of the rules that govern the Company’s expectations of its Personnel and provides you with resources to help when you have questions. Because these Policies cannot anticipate every situation that you might encounter, you are reminded to contact your supervisor, Corporate Compliance or Human Resources if you have any doubt as to the proper course of action in a particular situation. Remember, your supervisor, Corporate Compliance and Human Resources are available to you as a resource for any and all questions or concerns that you have about these Policies and ethical conduct at work.

To the extent that you believe that any of these Policies are inconsistent with another policy or practice of the Company, please advise Corporate Compliance immediately. Until any alleged inconsistency can be addressed, please know that these Policies prevail over any inconsistent



policy and require strict compliance. Failure to comply with, or violation of, these Policies may result in discipline, up to and including discharge.

POLICY DETAILS

1. **Corporate and Individual Responsibility** – The Company is dedicated to compliance with all applicable laws, regulations and rules. This is the foundation on which the Company’s ethical conduct is built. All Personnel are critical to the Company’s ability to be an ethical and responsible corporate citizen. To that end, we expect you to be committed to excellence and ethical behavior in your conduct, the performance of your job duties, and your interactions with the public, customers, contractors, suppliers, vendors and each other.

Ethics is an individual, as well as a corporate, responsibility. Each person is responsible for ensuring that his or her actions comply with these Policies. Another individual’s or a group of individuals’ failure to comply will not excuse or condone your failure to comply.

All Personnel are accountable for understanding and complying with these Policies and for reporting known or suspected violations of these Policies that are occurring or have occurred. Compliance with these Policies is a condition of employment.

Management is accountable for knowing and communicating the laws and regulations that affect their respective areas of operation; assessing the potential for unethical or illegal conduct and taking action to mitigate it; and supporting a system for reporting concerns about ethics and unsafe conduct that protects reporter confidentiality and anonymity to the fullest extent possible and ensures there is no retaliation against any individual for reporting a concern in good faith.

2. **Professional Conduct** – The Company is committed to providing a workplace that is safe and in which all Personnel are treated with dignity, respect and courtesy. To that end, you are expected to conduct yourself professionally in both word and deed. Professional conduct includes appropriate communications, honest and fair treatment of others, and respectful interactions and accountability for one’s actions, all of which foster positive working relationships with others and a professional working environment. *Please also see the Respect in the Workplace Policy, which is part of the Policies for Equal Employment Opportunity.*
3. **Harassment and Discrimination** – Our Company is an equal opportunity employer and provides a workplace free of harassment and unlawful discrimination. The Company prohibits harassment or discrimination based upon an individual’s race, color, religion, creed,

gender, pregnancy or related medical conditions, age (40 and over), sexual orientation, gender identity/expression, veteran status, past, current or future military service, national origin or ancestry, physical or mental disability, genetic information or any other consideration protected by federal, state or local laws. For additional information, please see the Policies for Equal Employment Opportunity.

- 4. Public Communications and Social Media** – You are not permitted to make public statements on behalf of the Company unless you have been designated as a Company spokesperson on a particular issue. Any public statements made on behalf of the Company must be fair and accurate. Any requests for comment received from a third party should be immediately directed to External Affairs.

If you are not an official Company spokesperson and you choose to disseminate information to the public in your personal capacity, always use good judgment, especially if: (1) you hold a leadership or public-facing role, or (2) you are making any statements that could be viewed by others as relating to the Company, its business activities, or your position within the Company. If it is not obvious that you are speaking for yourself, you must clearly and specifically state that the views expressed are your own and not those of the Company.

Personnel use of social media or other means of communication is subject to all applicable Company policies, including these Policies for Ethical Conduct, and must comply with all applicable laws and regulations. Social media is an evolving classification, which includes, but is not limited to, websites for posting images and videos (*e.g.*, YouTube); blogs (*e.g.*, WordPress); microblogs (*e.g.*, Twitter); online, internal and external communication, collaboration, and instant messaging systems (*e.g.*, Teams); wikis, podcasts, virtual worlds, bulletin boards, chat rooms and professional networking websites (*e.g.*, LinkedIn); social networking platforms (*e.g.*, Facebook, Snapchat); and enterprise sponsored websites (*e.g.*, DuquesneLight.com).

When using social media or other means of communication, Personnel must not disclose the Company's confidential or internal business information (*e.g.*, documents considered or marked "Confidential" or "Internal"). Personnel shall not disseminate content that is discriminatory, harassing, or in violation of the Company's Policies for Equal Employment Opportunity. Personnel shall comply with copyright, trademark and other intellectual property laws.

The Company may disapprove of certain statements made on social media or other channels of communication, especially statements relating to the Company or its business activities



and those that are unprofessional or otherwise violate Company policy. The consequences of such statements may affect your employment with the Company. *For additional information on social media usage, please see the Social Media Policy.*

5. **Environment** – Our Company is committed to conducting its business in an environmentally sensitive manner. The Company and its Personnel collectively and individually will take appropriate measures to protect the resources within our control and to foster responsible environmental awareness, policies and practices. We will comply with all applicable environmental, health and safety laws, rules and regulations.
6. **Protecting Company Property and Assets** – We all share the responsibility for protecting Company property and assets, whether financial, physical, intellectual or otherwise. You must take proper care to safeguard against direct and indirect misuse, theft, unauthorized use or disclosure, and waste of Company resources. This includes, in addition to facilities, funds, equipment, and employee time, information concerning technologies, business and financial data pertaining to sales, earnings, balance sheet items, market forecasts, business plans, acquisition strategies, customers, suppliers, employees and other confidential information.

Company property and assets should be used efficiently, responsibly and for legitimate Company business purposes only. Theft, unauthorized use or disclosure and misuse have a negative impact on the Company and will not be tolerated. Limited personal use of the Company's electronic resources and tools/equipment (based upon receiving approval from local supervisor) is permitted so long as such use is occasional, incidental, not for outside employment, does not result in additional costs and does not interfere with an employee's job responsibilities. Such limited personal use must be in a manner consistent with all departmental and Company policies and procedures.

No employee has an expectation of privacy in his or her use of Company systems or in any messages or information composed, sent, stored or received on Company systems. Likewise, the Company reserves the right to inspect, examine, monitor and record the use of its equipment, property and systems at any time with or without notice in accordance with applicable law.

It is critical that all Company property and systems, including computer, Internet, telephone and voicemail systems, be used appropriately and in accordance with all Company policies. Sending, saving, accessing, or viewing offensive or inappropriate material is prohibited. Messages stored and/or transmitted by the Company's electronic resources, including, but not limited to, the computer, voicemail, email, text messages, or the telephone system, must

not contain content that may be considered offensive by any reasonable person. Offensive material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes or images that would reasonably offend someone on the basis of his or her race, color, sex, sexual orientation, age, national origin or ancestry, disability, or any other category protected by federal, state or local law. *For additional information, please see the Acceptable Use of Electronic Resources Policy.*

- 7. Use of Company Funds and Facilities for Political Purposes** – In most cases, the law does not allow us to use Company funds for political purposes. However, under certain circumstances, general treasury funds may be used to solicit voluntary political contributions from employees and shareholders. To facilitate contributions, Duquesne Light Holdings, Inc. has established a Political Action Committee which solely collects, distributes and directs the use of funds for political purposes on behalf of the Company.

Any other Company funds used for a political purpose must have the prior written authorization of a Company Officer. You must also submit reports through the Corporate Secretary to the Audit Committee of the Board of Directors describing the amount of money spent, the reason for its expenditure, and the procedures followed.

- 8. Payments or Gifts to Government Officials** – You may not attempt to improperly influence federal, state or local government officials, including any direct or indirect form of promise, bribe, kickback, gift, or loan. Similarly, you must not offer indirect payments or favors that are intended to influence a public official’s judgments or decisions
- 9. Compliance with Laws and Regulations** – We are committed to compliance with all of the laws, rules and regulations that govern our industry and business dealings and expect all Personnel to be familiar with and abide by such laws, rules and regulations. As a public utility, we are also regulated under federal and state law. Among other things, be mindful of the prohibition on ex parte or unilateral contact or communications on issues presently before the Federal Energy Regulatory Commission (“FERC”) and the Pennsylvania Public Utility Commission (“PUC”).

All Personnel must perform their duties in accordance with the applicable laws and regulations and are expected to ask their supervisors, Legal Services or Corporate Compliance for guidance if they have questions or are uncertain of their legal obligations.

- 10. Gifts and Entertainment within a Business Relationship** – You may not offer, solicit or accept anything of value to improperly influence, or appear to improperly influence, any person in a business relationship with the Company. This includes, but is not limited to, bribes, kickbacks, or loans to or from any person or company with whom you do business on behalf of the Company. The offer or acceptance of cash gifts or cash equivalents (*e.g.*, gift cards and discounts) is strictly prohibited.

This policy is applicable to all business-related meals and events, and to ordinary business courtesies that are considered generally accepted industry practices. Such meals, events and courtesies must be reasonable, infrequent and not considered lavish. You must always be accompanied by the vendor or third party hosting the business-related meal or event. You also should remember that offering or accepting many small gifts or favors from the same individual or business could appear improper over a period of time. Further, any such gifts may not be intended to influence a business decision, be conditioned on receiving anything of value in return or be in excess of generally accepted business practices. The acceptance of anything of value, including gifts, meals or business entertainment, from any vendor being considered during the Request For Proposal (“RFP”) process, is strictly prohibited. Employees are prohibited from accepting gifts or anything of value from customers.

As a general guideline, any meal or event in excess of \$250 per person/employee and any gifts in excess of \$100 per person/employee should be presumed to be in violation of this policy absent extenuating circumstances. This limitation applies to any and all gifts including, but not limited to, meals, business courtesies and entertainment or sporting events whether received by you or a member of your immediate family. Finally, you are prohibited from providing any type of gifts to employees or representatives of regulated agencies. Any questions concerning compliance with this policy or with respect to specific situations should be directed to Corporate Compliance.

- 11. Honesty in Business Communications** – You have a responsibility for honesty and fair dealing in your relations with and on behalf of the Company. You are expected to be honest and forthright in your spoken and written communications with Company personnel and others with whom you conduct business. This expectation applies to written and verbal dealings, including internal and external reports, proposals, bids, price negotiations, and all other Company documents. You have a duty to ensure that any material issues are disclosed in a timely manner through the appropriate reporting channels so that issues may be fully considered by the Disclosure Committee.



If you are responsible for Company records and financial accounts, you must be sure that they conform to generally accepted accounting principles and regulatory accounting requirements including FERC and PUC requirements. You must not prepare, accept, transmit, or copy off-book transactions or records that intentionally or otherwise falsify, obscure, or disguise the true nature of transactions.

Further, this requirement extends to information and data provided on behalf of the Company to regulators, specifically, FERC, the North American Electric Reliability Corporation, ReliabilityFirst, and the PUC. You have a duty to ensure that all information provided to all regulated agencies is true and correct to the best of your knowledge and ability.

Our Company regularly communicates with the public (including, among other things, by making periodic filings with various governmental agencies). If you are involved in the preparation of these communications, you are responsible for ensuring that the disclosures made are full, fair and accurate, made on a timely basis and in a manner understandable to the public. This duty also extends to disclosures made to our investors.

- 12. Workplace Investigations** – You shall cooperate fully in workplace investigations and be honest and cooperative during the investigation process. You should feel comfortable reporting instances of non-compliance. Retaliation of any type will not be tolerated against an individual who truthfully and in good faith brings forward a concern or who assists in an investigation of a potential concern. Company Personnel attempting to retaliate against an individual for raising a concern or participating in an investigation will face disciplinary action, up to and including discharge.

- 13. Recordkeeping** – All Company records must be accurate and appropriately detailed in accordance with internal, legal or regulatory requirements. You must not prepare, accept, approve or transmit Company records, including time, expense and work records, that intentionally or otherwise falsify or misrepresent the true nature of the transactions or work performed. If you identify a weakness or error in any Company record or recordkeeping process, immediately report it to Corporate Compliance and Finance. Similarly, you are expected to observe all applicable federal and state laws and regulations regarding record retention as well as any applicable document retention holds issued in connection with threatened or pending legal action. *For additional information, please refer to the Corporate Records Retention Policy.*

- 14. Fair Dealing** – You must always deal fairly with, and not exhibit favoritism toward, the Company’s customers, suppliers, competitors, affiliates and Personnel. Unreasonable preference or discrimination in rates charged or service provided is strictly prohibited. You should refrain from taking unfair advantage of anyone through manipulation, concealment, misuse or abuse of privileged or confidential information, misrepresentation of material facts or any other unfair-dealing practice.
- 15. Antitrust** – You are prohibited from taking unfair advantage of others through manipulation, concealment, misuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices. You also are prohibited from engaging in activities with customers, suppliers or competitors such as bid rigging or price fixing that unfairly prevent or limit competition, or could appear to do so.
- 16. Conflicts of Interest** – Conflicts of interest can take many different forms. In general, a conflict may arise when your private interests interfere with the interests of the Company or impair, or appear to impair, your ability to make objective business decisions on behalf of the Company. You are to avoid any situation that might interfere, or appear to interfere with your obligations to the Company, including investments, outside employment or gifts from customers, suppliers or vendors, board memberships, volunteer positions, familial direct reporting relationships and undisclosed connections with suppliers or vendors utilized by the Company.

Conflicts of interest may arise in many situations, including in the context of business relationships (*e.g.*, co-workers, direct and indirect reporting relationships, suppliers, or business partners), competitor relationships, or personal relationships (*e.g.*, family members or friends). Possible examples include maintaining a personal or financial interest in an entity that transacts with the Company, having a business relationship with a company (outside of your Company responsibilities) that is in competition with the Company, receiving gifts or loans from parties who transact or compete with the Company or participating in Company business decisions involving an entity that employs your relative. For purposes of this policy, “relative” means your parent, spouse or significant other, sibling or child, and corresponding in-law relations (*e.g.*, parent-in-law, sibling-in-law, etc.).

If you are involved in any activity that could be considered a conflict of interest, or could appear to be a conflict of interest, you must disclose the matter to the Conflict of Interest Committee. Likewise, all material transactions or relationships that could be reasonably viewed or expected to give rise to a conflict of interest should be disclosed to the Conflict of

Interest Committee. Any waivers of conflict of interest must be obtained through the Conflict of Interest Committee. A Conflict of Interest Disclosure Form should be used to disclose and request an exemption from any potential or actual conflict of interest.

- 17. Financial Interest in Company Transactions or Other Business** – You may invest in publicly traded securities of firms with which the Company conducts business, so long as you have no material inside information and your investments are not large enough to affect any business activities or raise an appearance of impropriety. Note that other Company policies or agreements may place greater restrictions on certain employee investments. If you are unsure about or uncomfortable with a situation, discuss it immediately with your supervisor or Corporate Compliance.

You may not have a financial interest in a non-publicly traded corporation, partnership, or other firm with which the Company conducts or is likely to conduct business unless you have obtained the written approval of the Conflict of Interest Committee or the Board of Directors of the Company, as applicable.

Depending on the specific circumstances, it may be appropriate for you to sell or otherwise divest your interest. If you are unsure about a situation, contact Corporate Compliance.

- 18. Discoveries and Inventions** – During your employment, you may be involved in or responsible for new works, discoveries and inventions, which could have commercial value and contribute to scientific, technological, social, and cultural progress. Any and all such works, discoveries and inventions shall be the sole and exclusive property of the Company and you agree to disclose and assign all of your rights thereto to the Company. The Company claims ownership and control of the worldwide intellectual property rights, including copyright rights that result from the activity of its employees while employed by the Company. At no time will your work for the Company give you an ownership interest in any Company product developed or acquired now or later.

- 19. Outside Employment** – Generally, you are prohibited from competing with the Company or engaging in outside work that conflicts with Company interests. You may be employed by another organization or engage in self-employment only if your work does not actually or potentially compete or conflict with the Company and as long as your other employer or self-employment does not involve a business relationship with the Company. Similarly, you must end your other employment if and when, in the future, your work actually or potentially competes with the Company. A competitor is a business that by action or words displays the

intent to compete with the Company, or which is a supplier or business partner of the Company. Also, you are prohibited from engaging in self-employment or accepting any outside employment if your work will interfere with or adversely influence your job performance for the Company. A Conflict of Interest Disclosure Form should be used to disclose and request an exemption from any potential or actual conflict of interest.

Any outside employment or self-employment may not be conducted from Company facilities, or involve the use of Company time, equipment, supplies, or other resources.

- 20. Public Service** – While our Company encourages public service, charitable or volunteer work must not interfere with your job performance. You also must not make promises or create obligations on behalf of the Company while engaging in charitable or volunteer activity. For example, you must not make any commitment for the Company’s financial or physical resources to a volunteer organization without first seeking appropriate Company approvals.
- 21. Use of Company Position** – You may not use your Company position to promote your personal interest or the interests of others with whom you have a personal relationship when such conduct could cast doubt upon your impartiality.

You are prohibited from personally taking advantage of opportunities that are learned through use of Company property, information or position. You cannot use your position for personal financial profit, favor, or advantage, and must avoid any conduct which could create that impression.

You cannot usurp corporate opportunities you learn of through your Company position. Do not take for yourself any opportunity discovered through the use of Company property or information.

- 22. Personal and Familial Relationships** – You are expected always to ensure that your decisions about matters such as work assignments, promotions, purchases, and awards of contracts are made on the basis of merit, are above reproach and raise no appearance of impropriety.

Relatives of employees will not be favored in the application or hiring process and will be considered for employment on the same basis as other applicants, except that relatives of individuals currently working in Human Resources will not be considered for employment without authorization. For purposes of this policy, “relative” means an employee’s parent,



spouse or significant other, sibling or child, and corresponding in-law relations (*e.g.*, parent-in-law, sibling-in-law).

Relatives will not be placed into positions where their progress or assignments can be influenced by a relative or where their placement would create a conflict or potential conflict of interest. Relatives of supervisory personnel will not be placed in areas under the supervisory employee's direct or indirect supervision.

Supervisors are not permitted to engage in romantic relationships or enter into business or financial transactions with any employee over whom they have direct or indirect supervision. It is essential that supervisors behave professionally and conduct themselves in a fashion that does not create the appearance of impropriety or favoritism of direct or indirect reports.

If the marriage of two employees results in a conflict with this policy, reasonable efforts will be made to find an appropriate position for either of the two individuals. In determining which individual will be affected, job level, performance, operating needs of the Company and the preference of the individuals involved will be taken into consideration. If no alternate position can be located, the employment of the employee with the least Company seniority will be terminated.

- 23. Confidential Information** – As a part of your job responsibilities, you may have access to non-public information concerning the Company and its employees, customers, suppliers and vendors, including information relating to technology, business transactions, finances, operations or personnel, as well as information that may qualify as Bulk Electric System Cyber System Information or Critical Energy Infrastructure Information. Confidential information should only be disclosed internally and on a “need-to-know” basis, and/or as permitted by Company policies and applicable regulations. Do not use such information for your personal benefit or for the benefit of others during or after your employment with the Company.

Any information that we have regarding customers must be kept confidential and used only for approved Company purposes. All Personnel are responsible for safeguarding the confidentiality of customer information and to ensure that the use of customer information is consistent with Company policies, contractual obligations and applicable laws. You must never disclose customer information to anyone, including other Personnel, who have no business need to know the information or do not have appropriate customer or legal authorizations. You must not use customer information for personal interest, benefit or gain, or help an unauthorized third party obtain customer information. Furthermore, it is the duty

of all Personnel to detect, prevent and respond to unauthorized or fraudulent use of customer information.

The Company has a major investment in intellectual property, such as trade secrets and confidential information, and protecting this property is a high priority for the Company. The Company is committed to the aggressive pursuit of violators by proper legal means. Should your employment with the Company terminate, you must return all materials, documents or other written information obtained during your employment other than employee benefit information distributed by the Company for your personal use.

24. **Copyrights** – Just as the Company expects its intellectual property rights to be observed by others, it respects the property rights of others. You may not intercept, duplicate, or appropriate through electronic or other means such materials as computer software, video or audio recordings, publications, or other protected intellectual property except by prior permission of the owner of that property.
25. **Disclosure of Information** – Within the Company, you may reveal confidential information only to individuals with a legitimate business need to know such information. No one working for the Company is to disclose to unauthorized persons, whether inside or outside the Company, any information that could conceivably compromise the Company’s confidential information or other intellectual property. In this regard, every reasonable precaution must be taken to prevent the inadvertent disclosure of confidential information. Maintaining confidentiality of Company information applies even after you leave the Company’s employment.

Due to the regulated nature of our business, all Personnel need to be aware of the internal communication restrictions that may apply to interactions with other Company Personnel. In accordance with the FERC Standards of Conduct, the Company must ensure that its Transmission Function employees function separately and independently from its and its affiliates’ Marketing Function employees, which includes the disclosure of information that would otherwise not be publicly available.

Also, in accordance with the PUC Code of Conduct, the disclosure of information from an electric distribution company to an affiliate electric generation supplier that would result in any preference in the processing of a request for competitive electric generation supplier service, or the disclosure or dissemination of customer information is prohibited. Likewise, the disclosure of confidential information or customer information, including consumer-specific energy usage data (CEUD), to any affiliate company should be conducted in

accordance with the Company's Privacy Policy. *For additional information, please refer to the Duquesne Light Company Privacy Policy, FERC Standards of Conduct, and the PUC Code of Conduct, 52 Pa. Code § 54.122.*

Outside the Company, you may reveal confidential information and other intellectual property only when required to do so by law, subpoena, or other legal or administrative process that compels disclosure. Even then, proper legal protection to maintain the confidentiality and protection of the information must be sought. Unless otherwise prohibited by law, you are to immediately inform the Office of General Counsel of any and all subpoenas or other legal processes which request testimony or information.

26. **Employment References** – Requests for employment information should be directed to Human Resources. You are not to provide professional references for former Company Personnel.

27. **Insider Trading** – Even though the Company is not currently a publicly traded company, we issue debt to the public and are still required to comply with insider trading regulations. Both ethical standards and federal law prohibit you from using non-public information when trading or recommending the trading of securities of the Company or its customers, suppliers or other corporations with which the Company has contractual relationships or may be negotiating transactions. Insider trading is strictly prohibited. Such inside information includes any knowledge you may have about dividend changes, earnings estimates, significant changes in operations, upcoming mergers or acquisitions, major litigation, new discoveries, products, and services, and any other information which could influence a person to sell, buy or otherwise trade in a company's securities.

If you have insider information, you must not buy, sell, or recommend transactions involving a company's securities until after the company has made the information public.

28. **Business Travel and Expenses** – All business or travel related expenses incurred on behalf of the Company should be reasonable, necessary and have a legitimate business purpose. Timely submission of accurate expense reports is required. Employees are expected to use good judgment in selecting venues for dining or entertainment. Expenses must be incurred at establishments that are professional, appropriate for business activities and under circumstances conducive to a business discussion. *For additional information, please see the Company's Business Travel and Expense Reimbursement Policy.*



- 29. Drug and Alcohol Policy** – The Company is committed to maintaining a drug-free work environment, including a workforce free from the effects of drug and alcohol abuse. Impairment of your capacity to perform your work through the use of alcohol, drugs or other intoxicants will not be tolerated. In addition to potentially diminishing your own work capacity, and jeopardizing your safety and health, the abuse of such substances can seriously jeopardize the safety of others and the welfare of the Company’s business.

It is a violation of Company policy for you to possess, use or be under the influence of alcohol (as defined by regulation or legal requirement under Pennsylvania law) while at work or otherwise engaged in Company business whether on Company property or outside of Company property. Use of alcohol during work hours is strictly prohibited. While alcohol may be consumed after work hours at a business event (*e.g.*, business dinner, celebratory event), you are reminded that only moderate consumption is permitted and you are expected to comport yourself professionally at all times. Further, it is a violation of Company policy for you to use, possess, sell, or transfer illegal or medically unauthorized drugs or be under the influence of such drugs while at work or otherwise engaging in Company business at any time. Any violation of this policy will subject you to disciplinary action, up to and including discharge.

If you or an eligible family member has a problem with drug or alcohol use, the Company provides confidential help through the Employee Assistance Program (“EAP”). For more information, you may contact the EAP confidentially and toll free at 1-800-865-3200, or online at www.resourcesforliving.com. Username and password information is available on the Human Resources page of DLConnect.

- 30. Workplace Violence** – The Company takes workplace violence extremely seriously. All forms of workplace violence, threatened, communicated or carried out, by or against any employee, customer, supplier, contractor or visitor, are strictly prohibited. This policy applies to all Company Personnel, whether on or off Company property. This includes any form of harassment, bullying, intimidation or fighting.

Any use or possession of dangerous weapons, whether illegal or not, is prohibited on Company property or while on Company business. A dangerous weapon is a device, instrument or substance that is used for, or is readily capable of, causing death or serious bodily injury, including but not limited to guns, knives, clubs, chemicals and explosive devices. Dangerous weapons do not include work tools, or non-flammable pepper spray or



mace, when used appropriately. Any employee in violation of this policy can be disciplined, up to and including discharge.

If you experience or observe any conduct or person that you deem suspicious or potentially dangerous, report that person or situation to Human Resources, Security Services, or your supervisor immediately. If the situation warrants it, please also contact 911 or other appropriate authorities. *For additional information, please see the Workplace Violence Prevention and Response Policy.*

31. Your Responsibilities and Reporting Violations – You are responsible for reviewing these Policies and complying with them.

If you are aware of or suspect a violation of these Policies for Ethical Conduct, you must promptly report it to your supervisor, Human Resources or Corporate Compliance. It is very important that you raise issues promptly. You should feel comfortable reporting issues of non-compliance in confidence and without fear of retaliation. Retaliation of any type will not be tolerated against any individual who truthfully and in good faith brings forward a concern or who assists in an investigation of a potential concern. Company Personnel attempting to retaliate against an individual for raising a concern or participating in an investigation will face disciplinary action, up to and including discharge.

In addition, if you prefer, you may confidentially and anonymously report compliance or ethical concerns to the Company's Ethical Conduct Compliance Hotline by calling 1-888-309-1563, or through the website at <https://duquesnelight.alertline.com>.

Corporate Compliance is available to you as a resource for any and all questions you may have regarding these Policies or compliance with them. You are encouraged to contact Corporate Compliance regarding any concerns or issues.

While these Policies apply to every employee, managerial and supervisory employees have a special duty to lead by example, to ensure that those whom they supervise comply with these Policies and to respond promptly and appropriately to all inquiries and reports received about these Policies.

All Personnel are responsible for following these Policies. Violation of these Policies, common sense ethical standards, or any applicable state or federal laws may result in disciplinary action, up to and including discharge and criminal and/or civil prosecution depending upon the severity of the misconduct on a case-by-case basis. Further, illegal or



unethical behavior by Personnel, whether inside or outside of the workplace, may be considered by the Company with respect to your continued employment.

ENFORCEMENT

These Policies shall be adhered to by all Personnel. Failure to do so may result in discipline, up to and including discharge.

The Company reviews its policies regularly and reserves the right to amend, modify or terminate these Policies and any related guidelines or procedures at any time.

REFERENCES AND RELATED DOCUMENTS

- Policy No. 300 - [Business Travel and Expense Reimbursement Policy](#)
- Policy No. 601 - [Policies for Equal Employment Opportunity](#)
- Policy No. 710 - [Ethical Conduct Compliance Hotline Policy](#)
- Policy No. 711 - [Acceptable Use of Electronic Resources Policy](#)
- Policy No. CP-013 - [Workplace Violence Prevention and Response Policy](#)
- Policy No. CP-028 - [Social Media Policy](#)
- Policy No. CM-DL-1001 - [FERC Standards of Conduct – Written Procedures](#)
- [Conflict of Interest Disclosure Form](#)
- [Duquesne Light Company Privacy Policy](#)
- [PUC Code of Conduct, 52 Pa. Code § 54.122](#)



DEFINITION OF TERMS

Personnel	Any employee, intern, Contingent Worker or NEWA.
Contingent Worker	A third party entity or individual who is not an employee of the Company who performs paid Services for the Company on a temporary basis, usually pursuant to a contract, and requires physical or electronic access to Company facilities and secured assets.
Non-Employee With Access (“NEWA”)	Any non-employee of the Company who requires physical or electronic access to Company facilities and secured assets and does not otherwise meet the definition of Contingent Worker.
Services	Work performed for the Company by a third party entity or individual who is not an employee of the Company, usually pursuant to a contract.