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|  | 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”) in any location where Personnel perform work for the Company or engage in other employment-related activities and includes Company facilities and property, field work locations, and any remote locations (“Workplace”).

Policy Statement

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 federal, state and local laws, rules and regulations. It is the responsibility of all Personnel to read, understand and adhere to these Policies and all other Company policies at all times in carrying out the business activities of the Company in a manner that avoids impropriety or the appearance of impropriety.

Compliance with the law, however, is just the beginning of ethical conduct. These Policies set forth many of the rules that govern the Company’s expectations of its Personnel and provides resources to help with questions. Because these Policies cannot anticipate every situation that Personnel might encounter, Personnel are reminded to contact their supervisor, Corporate Compliance or Human Resources if they have any doubt as to the proper course of action in a particular situation. Supervisors, Corporate Compliance and Human Resources are available as a resource for any and all questions or concerns about these Policies and ethical conduct in the Workplace. While these Policies apply to all Personnel, 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.

To the extent that any of these Policies are inconsistent with another policy or practice of the Company, please advise Corporate Compliance immediately. Until any inconsistency can be addressed, these Policies prevail over any inconsistent policy and require strict compliance.

Policy Details

1. **Corporate and Individual Responsibility** – The Company is dedicated to compliance with all applicable federal, state and local laws, regulations and rules. This is the foundation on which the Company’s expectations for ethical conduct are built. All Personnel are critical to the Company’s ability to be an ethical and responsible corporate citizen. To that end, the Company expects Personnel to be committed to excellence and ethical behavior in their

conduct, the performance of their job duties, and their 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 their actions comply with these Policies. One individual's or a group of individuals' failure to comply will not excuse or condone another's 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, all Personnel are expected to conduct themselves 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, sex, 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, protected hairstyles such as protective and cultural hair textures and natural hairstyles, 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** – Personnel are not permitted to make public statements on behalf of the Company unless they 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 Communications. If you are asked or wish to speak, present, or prepare articles for publication relating to Company issues or activities, you must obtain prior approval from Communications and Corporate Responsibility. The text of any such speech, presentation or article should also be provided to Communications for review prior to the scheduled delivery or publication date.

Personnel who choose to disseminate information to the public in their personal capacity must always use good judgment, especially if they: (1) hold a leadership or public-facing role, or (2) are making any statements that could be viewed by others as relating to the Company, its business activities, or their position within the Company. If it is not obvious that Personnel are speaking for themselves, they must clearly and specifically state that the views expressed are their 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, but not limited to, these *Policies for Ethical Conduct*, the *Policies for Equal Employment Opportunity*, and the *Social Media Policy*, and must comply with all applicable federal, state and local laws and regulations. Personal use of social media must not interfere with job duties for the Company. Social media is an evolving online social networking and communication tool, which includes, but is not limited to, websites for posting images and videos (e.g., YouTube, TikTok); blogs (e.g., WordPress); microblogs (e.g., X (formerly Twitter), Tumblr); online, internal and external communication systems (e.g., Teams, Zoom), instant messaging systems, wikis, podcasts, virtual worlds, bulletin boards, chat rooms, professional networking websites (e.g., LinkedIn, Plaxo), social networking platforms (e.g., Facebook, Snapchat); enterprise sponsored websites (e.g., DuquesneLight.com), and online collaboration websites (e.g., Huddle).

When using social media or other means of communication, Personnel must not disclose the Company's confidential, proprietary or other 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 employment or engagement 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 federal, state and local 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. Personnel 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 Personnel 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 job responsibilities. Such limited personal use must be in a manner consistent with all departmental and Company policies and procedures.

Personnel do not have an expectation of privacy in their 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 their race, color, religion, 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** – The Company must comply with any federal, state and local laws that regulate and restrict the use of corporate funds in connection with elections and other political activities. 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 in connection with certain permissible lobbying activities coordinated by the Company's Government Affairs Personnel and/or to solicit voluntary political contributions from employees and shareholders. To facilitate voluntary political contributions to state candidates, 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.

8. **Fair Dealing and Unfair Competition** – Personnel must always deal fairly with, and not exhibit favoritism toward, the Company's customers, suppliers, competitors, affiliates and other Personnel. Unreasonable preference or discrimination in rates charged or service provided is strictly prohibited. Personnel may not take 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. Personnel 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, monopolize a market in violation of antitrust or competition law or could appear to do so.

Personnel should avoid any practices that could lead to claims of “unfair competition.” For instance, Personnel shall not spread false rumors about competitors or make misrepresentations about their businesses or pass on anecdotal or unverified stories about a competitor’s products or services as the truth. In addition, Personnel shall not disrupt a competitor’s business. This includes bribing a competitor’s employees, posing as prospective customers or using deceptive practices such as enticing away employees in order to obtain secrets or destroy a competitor’s organization. Further, Personnel shall not make misrepresentations of price and product. False information or misrepresentations about the nature, quality or character of the Company’s services and products are both illegal and contrary to Company policy. Personnel may only describe our services and products based on their documented specifications.

9. **Government Bids and Procurement** – The U.S. Government and many state and local governments (including public authorities) have adopted comprehensive laws and regulations governing their purchases of products from private contractors. These laws and regulations are intended to assure that governmental entities receive pricing, terms, and conditions equivalent to those granted to a company’s most favored commercial customers and that there is full and open competition in contracting.

When entering into agreements, grant awards, or contracts and/or selling products or services with governmental bodies or agencies, the Company is accountable for complying with all applicable laws, regulations, and requirements, including, but not limited to, full cooperation with any governmental agencies responsible for audits, investigations, or corrective actions related to such matters. Certifications to, and contracts with, governmental bodies or agencies are to be signed by authorized Personnel based upon knowledge that all requirements have been fully satisfied. Federal, state, or local government officials or employees (“Public Official”) cannot require that the Company hire or use certain contractors/vendors for the Company to win the Public Official’s support or influence for a Company proposal when that request is made for the personal benefit of the Public Official or provides an unfair advantage to the Company.

Moreover, submission of competitive bid or qualification document to a Public Official (or receipt of such documentation from a Public Official) with an understanding that the qualification or bid document will be accepted regardless of what other competitors may submit, is prohibited bid rigging.

10. **Compliance with Laws and Regulations** – We are committed to compliance with all 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, Legal Regulatory, or Corporate Compliance for guidance if they have questions or are uncertain of their legal obligations.

11. **Gifts and Entertainment within a Business Relationship** – Personnel 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, including Public Officials. This includes, but is not limited to, bribes, kickbacks, or loans to or from any person or company with whom Personnel do business on behalf of the Company. If a gift unduly influences or makes Personnel feel obligated to “pay back” the other party with business, receipt of the gift is unacceptable. The offer or acceptance of cash gifts or cash equivalents (e.g., gift cards and discounts) is strictly prohibited. Personnel also should be aware of and must comply with any applicable federal, state, and local laws regulating and restricting gifts and entertainment within a business relationship involving Public Officials. Personnel must not offer indirect payments or favors that are intended to improperly influence or appear to improperly influence the judgments, decisions, or acts of Public Officials, political parties or candidates for government office.

Gifts, business-related meals and events and other services or favors can only be given or accepted to the extent they are ordinary business courtesies that are considered generally accepted industry practices. Such meals, events and courtesies must be reasonable, infrequent and not considered lavish. Personnel must always be accompanied by the vendor or third party hosting the business-related meal or event. Personnel also should remember that offering or accepting multiple meals, participating in multiple events or accepting multiple gifts from the same individual or business could appear improper over a period of time even if the value of a single item or event is less than the limits outlined herein. 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, or the *provision* of anything of value, including gifts, meals or business entertainment, to a prospective client, during any type of bidding process, such as when the Company is evaluating vendor bids for Company work (including, but not limited to, Requests for Proposal) and/or when the Company is bidding for the business of a prospective client, is strictly prohibited. Personnel are prohibited from accepting gifts or anything of value from customers.

As a general guideline, any meal or event in excess of \$250 (per employee) and any gifts or combination of gifts received from an individual or company in a single year in excess of \$100 should be presumed to be in violation of this policy absent extenuating circumstances. These limitations apply to any and all events and gifts including, but not limited to, meals,

business courtesies and entertainment or sporting events received directly by Personnel or on their behalf.

Finally, Personnel are prohibited from providing any type of gifts to employees or representatives of any federal, state, or local auditors of the Company and/or regulated agencies, including, but not limited to, the Pennsylvania Public Utility Commission, ReliabilityFirst, or the Federal Energy Regulatory Commission. Personnel also should be aware that auditors and/or regulated agencies may have their own policies addressing the acceptance of meals, refreshments, and similar items. Personnel should consult any such policies accordingly. Any questions concerning compliance with this policy or with respect to specific situations should be directed to Corporate Compliance.

12. **Honesty in Business Communications** – Personnel have a responsibility for honesty and fair dealing in their relations with and on behalf of the Company. Personnel are expected to be honest and forthright in their spoken and written communications both within the Company and with others with whom they conduct business. This expectation applies to written and verbal dealings, including internal and external reports, proposals, bids, price negotiations, invoices, and all other Company documents. Personnel 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 Personnel are responsible for Company records and financial accounts, they must be sure that they conform to generally accepted accounting principles and regulatory accounting requirements including FERC and PUC requirements. Personnel 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. Personnel have a duty to ensure that all information provided to all regulated agencies is true and correct to the best of their knowledge and ability.

The Company regularly communicates with the public (including, among other things, by making periodic filings with various governmental agencies). If Personnel are involved in the preparation of these communications, they 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.

13. **Workplace Investigations** – Personnel shall cooperate fully in Workplace investigations and be honest and cooperative during the investigation process. Personnel 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. 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. *See also Ethical Conduct Compliance Hotline Policy.*

14. **Recordkeeping** – All Company records must be accurate and appropriately detailed in accordance with internal, legal or regulatory requirements. Personnel must not prepare, accept, approve or transmit Company records, including time, expense and work records, regulatory filings, inspection records and financial reports, that intentionally or otherwise falsify or misrepresent the true nature of the transactions or work performed. If Personnel identify a weakness or error in any Company record or recordkeeping process, immediately report it to Corporate Compliance and Finance. Similarly, Personnel are expected to observe all applicable federal and state laws and regulations regarding record retention as well as any applicable document retention holds including those issued in connection with threatened or pending legal or regulatory action. *For additional information, please see the Corporate Records Retention Policy, the FERC Record Retention Policy, and the Data Classification and Protection Policy.*
15. **Conflicts of Interest** – Conflicts of interest can take many different forms. In general, a conflict may arise when private interests interfere with the interests of the Company or impair, or appear to impair, Personnel’s ability to perform their duties for the Company and make objective business decisions on behalf of the Company. Personnel are to avoid any situation that might interfere or appear to interfere with their 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), fiduciary relationships (e.g., employee sitting in a school board or non-profit organization board seat), competitor relationships, or personal relationships (e.g., family members or friends). Possible examples include, but are not limited to, maintaining a personal or direct financial interest in an entity that transacts with the Company, having a business relationship with a company (outside of 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 or contracts with or is subject to a controlling ownership interest by the individual’s Relative. For purposes of this policy, “Relative” means a parent, spouse or significant other, sibling or child, and corresponding in-law or stepfamily relations (e.g., parent-in-law, sibling-in-law, stepparent, stepsiblings, etc.). “Direct Financial Interest” means owning stock or equity in an individual capacity and not through an investment vehicle. “Controlling Ownership Interest” means having ownership in a corporation, partnership or other legal entity with sufficient voting interest to determine direction or management of the entity.

If employees are involved in any activity that could be considered a conflict of interest, or could appear to be a conflict of interest, they 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.

16. **Financial Interest in Company Transactions or Other Business** – Generally, Personnel may invest in publicly traded securities of firms with which the Company conducts business, so long as they have no material inside information and their 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 Personnel are unsure about or uncomfortable with a situation, they should discuss it immediately with their supervisor or Corporate Compliance. Investments may require disclosure and review by the Conflict of Interest Committee.

Employees 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 they 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 Personnel to sell or otherwise divest their interest. If Personnel are unsure about a situation, they should contact Corporate Compliance.

17. **Discoveries and Inventions** – In the performance of work duties, Personnel 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 Personnel agree to disclose and assign all of their 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 Personnel while employed by the Company. At no time will work for the Company give Personnel an ownership interest in any Company product developed or acquired now or later.
18. **Outside Employment** – Generally, employees are prohibited from competing with the Company or engaging in outside work that conflicts with Company interests. Employees may be employed by another organization or engage in self-employment only if their work does not actually or potentially compete or conflict with the Company and as long as their other employer or self-employment does not involve a business relationship with the Company. Similarly, employees must end their other employment if and when, in the future, their 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, employees are prohibited from engaging in self-employment or accepting any outside employment if employees work will interfere with or adversely influence their 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.

19. **Public Service** – While the Company encourages public service, charitable or volunteer work must not interfere with job performance. Personnel also must not make promises or create obligations on behalf of the Company while engaging in charitable or volunteer activity. For example, Personnel must not make any commitment for the Company's financial or physical resources to a volunteer organization without first seeking appropriate Company approvals.

20. **Use of Company Position** – Personnel may not use their Company position to promote their personal interest or the interests of others with whom they have a personal relationship when such conduct could cast doubt upon their impartiality.

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

Personnel cannot usurp corporate opportunities they learn of through their Company position. Personnel may not take for themselves any opportunity discovered through the use of Company property or information.

21. **Personal and Familial Relationships** – Personnel are expected always to ensure that their 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.

Personnel 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 Personnel 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 or relationship 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 or otherwise mitigate any potential conflict. 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 and the potential conflict cannot be effectively mitigated, the employee with the least Company seniority may be discharged. A *Conflict of Interest Disclosure Form* should be used to disclose any potential or actual conflict of interest.

22. **Confidential Information** – As a part of Personnel’s job responsibilities, they 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. Personnel must take reasonable and appropriate care in handling confidential information in compliance with Company policies in all Workplaces. Confidential or Internal information should only be disclosed internally and on a “need-to-know” basis, and/or as permitted by Company policies and applicable regulations. Personnel may not use such Confidential or Internal information for personal benefit or for the benefit of others during or after their employment with the Company. Personnel should never attempt to gain access to confidential information they do not have authorization to access. *For additional information, please see the Data Classification and Protection Policy.*

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. Personnel 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. Personnel 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 significant 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 employment with the Company terminate for any reason, Personnel must return all materials, documents or other written information obtained during their employment other than employee benefit information distributed by the Company for their personal use.

23. **Copyrights** – Just as the Company expects its intellectual property rights to be observed by others, it respects the property rights of others. Personnel 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.

24. **Disclosure of Information** – Within the Company, Personnel may reveal confidential information only to individuals with a legitimate business need-to-know such information. Personnel should not 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 in all Workplaces and continues even after Personnel are no longer performing duties for the Company.

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 own 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 see the Duquesne Light Company Privacy Policy, FERC Standards of Conduct, and the PUC Code of Conduct, 52 Pa. Code § 54.122.*

Outside the Company, Personnel 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, Personnel are to immediately inform the Office of General Counsel of any and all subpoenas or other legal processes which request testimony or information.

25. **Employment References** – Requests for employment information should be directed to Human Resources. Employees are not to provide professional references for former Company Personnel.
26. **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 Personnel 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 Personnel 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 Personnel have insider information, they must not buy, sell, or recommend transactions involving a company's securities until after the company has made the information public.

27. **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. Personnel 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.*

28. **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 a Personnel's capacity to perform their work through the use of alcohol, drugs or other intoxicants will not be tolerated. In addition to potentially diminishing their own work capacity, and jeopardizing their 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 Personnel to possess, use or be under the influence of alcohol (as defined by regulation or legal requirement under Pennsylvania law) while performing their work duties 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), Personnel are reminded that only moderate consumption is permitted and they are expected to comport themselves professionally at all times. Further, it is a violation of Company policy for Personnel 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 Personnel to disciplinary action, up to and including discharge. *For additional information, please see the Company's Drug and Alcohol-Free Workplace Policy.*

If an employee 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, employees 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.

29. **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 in all Workplaces. This includes any form of harassment, bullying,

intimidation or fighting. Any conduct that could reasonably be interpreted as intent to do harm to another person or property will be considered a threat and treated accordingly.

Any use or possession of dangerous weapons, whether illegal or not, is prohibited on Company property or while conducting 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 Personnel in violation of this policy can be disciplined, up to and including discharge.

Personnel who experience or observe any conduct or person that they deem suspicious or potentially dangerous, should report that person or situation to Human Resources, Security Services, or a 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.*

30. **Responsibilities and Reporting Violations** – Personnel are responsible for reviewing these Policies and complying with them.

If Personnel are aware of or suspect a violation of these *Policies for Ethical Conduct*, they must promptly report it to their supervisor, any other member of management, Human Resources or Corporate Compliance. Also, Personnel 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.ethicspoint.com>. It is very important that Personnel raise issues promptly.

Failure to report known or suspected non-compliance or misconduct is not only a violation of Company policy, but may be a violation of law. Knowingly and intentionally making a false report of non-compliance or misconduct is unacceptable and against Company Policy.

Personnel 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. *For more information, please see the Ethical Conduct Compliance Hotline Policy.*

Enforcement

All Personnel are responsible for following these Policies. Violation of these Policies, common-sense ethical standards, or any applicable federal, state or local 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 their continued employment or engagement with the Company.

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-008 – [Corporate Records Retention Policy](#)
- Policy No. CP-013 – [Workplace Violence Prevention and Response Policy](#)
- Policy No. CP-028 – [Social Media Policy](#)
- Policy No. CP-031 – [Drug and Alcohol-Free Workplace Policy](#)
- Policy No. CM-DL-1001 – [FERC Standards of Conduct – Written Procedures](#)
- Policy No. CM-DL-1002 – [FERC Record Retention Policy](#)
- Policy No. IT-POL-100-2.5 – [Data Classification and Protection Policy](#)
- [Conflict of Interest Disclosure Form](#)
- [Duquesne Light Company Privacy Policy](#)
- [PUC Code of Conduct, 52 Pa. Code § 54.122](#)

Definition of Terms

| Term | Definition |
|-----------------------------------|--|
| 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. |
| Public Official | Federal, state, or local government officials or employees. |
| 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. |
| Workplace | Any location where Personnel perform work for the Company or engage in other employment-related activities. Workplaces include Company facilities and property, field work locations, and any remote locations. |
| Relative | A parent, spouse or significant other, sibling or child, and corresponding in-law relations (e.g., parent-in-law, sibling-in-law, etc.). |



Document Control Record

| POLICY MANAGEMENT AND APPROVAL | |
|--------------------------------|--|
| Issued By: | Corporate Compliance |
| Distribution: | Public – All Personnel |
| Implementation: | Communication and training will be provided to all employees. |
| Policy Review Schedule: | These Policies shall be reviewed at least every two (2) years and, if necessary, updated. A record of any changes made during this review shall be noted in the Policy Revision History table (below). |

| POLICY APPROVAL | | | |
|-----------------|--|--------------------|-----------|
| Sponsor | Title | Approval Signature | Date |
| E. Labriola | Managing Director and Chief Compliance Officer | | 12/6/2023 |
| Approved By | Title | Approval Signature | Date |
| K. Walker | President and Chief Executive Officer | | 12/6/2023 |

| POLICY REVISION HISTORY | | | |
|-------------------------|----------------------------|--|----------|
| Version | Prepared By | Summary of Changes | Date |
| 0 | E. Creahan; E. Labriola | Issued Guidelines for Ethical Conduct | 1-1-13 |
| 1 | J. DiPasquale | Review of entire document, reformatted on new Corporate Policy template. Revisions to gifts and workplace violence sections to clarify. Other minor revisions made throughout for clarification and to include references to other policies that have been updated since initial issuance. | 9-1-14 |
| 2 | M. McKown | Review of entire document, reformatted with new logo. Minor revisions and clarifications to maintain consistency with policy terminology. | 8-9-16 |
| 3 | M. McKown | Review of entire document. Minor revisions and clarifications to maintain consistency with policy terminology. | 10-16-17 |
| 4 | M. McKown | Review of entire document. Added language to workplace violence section regarding non-flammable pepper spray and mace. | 9-19-18 |

| POLICY REVISION HISTORY (Continued) | | | |
|--|---|--|-------------|
| Version | Prepared By | Summary of Changes | Date |
| 5 | K. McIntyre; M. McKown | Review of entire document. Minor revisions and clarifications to maintain consistency with policy terminology. | 7-17-19 |
| 6 | K. McIntyre; M. McKown | Review of entire document. Revisions to social media and public communications sections to clarify and other minor revisions to maintain consistency among policies. | 12-1-20 |
| 7 | K. McIntyre; M. McKown | Revisions to use of company position and business travel and expenses sections to clarify. | 2-1-21 |
| 8 | T. Pfeifer; K. McIntyre; V. LeDonne | Review of entire document. Revisions made to reflect remote work environment and other minor revisions for clarity and consistency among policies. | 12-13-21 |
| 9 | T. Pfeifer; V. LeDonne; L. Mantella | Review of entire document; incorporation of concepts from TEN's Supplemental Ethics Policy; other minor revisions for clarity and consistency. | 12-12-22 |
| 10 | T. Pfeifer; L. Mantella | Review of entire document. Minor revisions made for clarity and consistency. | 12-18-23 |