

# **Duquesne Light Company's Supplier Code of Conduct**



## **Purpose**

This Supplier Code of Conduct lays out the minimum standards of conduct all Suppliers must adhere to while conducting business with or on behalf of the Company. The Supplier Code of Conduct reaffirms the Company's commitment to conducting its business in accordance with the highest ethical standards, including a commitment to the welfare of workers and using resources responsibly and efficiently, and requires the Company's Suppliers to uphold that same commitment.

## **Scope**

Suppliers and their employees, personnel, business partners, agents, suppliers and subcontractors (collectively referred to as "Suppliers") must adhere to this Supplier Code of Conduct while conducting business with or on behalf of Duquesne Light Holdings, Inc. or its business subsidiaries, including Duquesne Light Company, DQE Communications LLC, and TEN, Inc. (collectively referred to as "the Company"). This Supplier Code of Conduct will be incorporated into any agreement by and between a Supplier and the Company whether or not referenced hereto in such underlying agreement (the "Agreement").

## **Expectations of Business Conduct**

### ***Policies for Ethical Conduct***

In addition to this Supplier Code of Conduct, the Company maintains Policies for Ethical Conduct which may apply in certain instances to its Suppliers. For any Supplier who will be performing work on Company premises, performing work at a Company worksite, or accessing Company cyber systems or electronic resources, the Company expects such Supplier to adhere to its Policies for Ethical Conduct.

Through its Policies for Ethical Conduct, the Company has established standards that include ethical business practices and compliance with regulatory requirements. The Company expects applicable Suppliers to embrace this commitment to compliance and integrity through adherence to its Policies for Ethical Conduct. The Policies for Ethical Conduct are available on the Company's website at <https://www.duquesnelight.com/docs/default-source/default-document-library/policies-for-ethical-conduct.pdf>.

This Supplier Code of Conduct, together with the Policies for Ethical Conduct when applicable, sets forth the Company's standards and expectations with respect to key areas of corporate responsibility for our Suppliers.

### ***Health and Safety***

The health and safety of the Company's employees, Suppliers, and the public is of paramount importance to the Company. Suppliers are solely responsible for the safe performance of their work and must provide a safe and healthy working environment for all employees that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment. Suppliers must comply with all applicable occupational health and safety laws, regulations, standards, policies, procedures, and rules, including adherence to guidelines put forth by the Center of Disease Control (CDC) and the World Health Organization (WHO). Suppliers must adhere to all regulatory and contract-specific safety requirements and specifications, including site-specific rules when



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performing work. Accidents, injuries, hazards and unsafe activities and/or conditions should be reported promptly to the appropriate Company representative.

The Company reserves the right to audit Suppliers' safety records and Suppliers will promptly provide any safety-related reports requested by the Company. The Company reserves the right to request any employee, agent, or subcontractor of a Supplier be removed from any Company-owned or Company-operated property if the Company, in its reasonable discretion, believes that such employee, agent, or subcontractor exhibits disregard for applicable safety requirements.

### ***Legal and Regulatory Compliance***

All Suppliers must conduct their business activities in full compliance with all applicable laws and regulations and in compliance with this Supplier Code of Conduct and, if applicable, the Company's Policies for Ethical Conduct, which may exceed local legal requirements while conducting business with or on behalf of the Company.

Applicable statutes and regulatory requirements can include, but are not limited to, those prohibiting bribery, kickbacks, corruption, and other unethical business practices. Suppliers must comply with all applicable anti-trust laws, anti-corruption laws, commercial codes, subcontractor regulations, foreign exchange laws, personal privacy laws, copyright laws, international treaties, applicable import/export laws, and protocols.

Suppliers must also ensure compliance with federal and state energy regulatory commission specific codes and standards of conduct that address discrimination and preferential treatment between regulated companies and their affiliates.

### ***Protecting Company Property and Assets***

No Supplier has an expectation of privacy in Supplier's 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 and monitor the use of Company equipment, property and systems at any time with or without notice in accordance with applicable law. A Supplier's use of any Company property or system, including computer, Internet and voicemail systems, must be used appropriately and in accordance with all Company policies, including the Policies for Ethical Conduct.

### ***Fair Employment Practice***

Suppliers are expected to comply with all applicable U.S. and international labor and employment laws. The Company expects its Suppliers to adopt and adhere to policies prohibiting violations of applicable labor and employment laws, including but not limited to laws against: forced labor, human trafficking, inhuman treatment and infringement of human rights, child labor, harassment of any kind, and discrimination. Suppliers shall ensure adherence to appropriate wage payment, regulation of working hours, freedom of association, and industrial/occupational safety regulations.

### ***Harassment and Discrimination***

Suppliers must commit to a workforce and workplace free of harassment and unlawful discrimination. Suppliers must provide equal opportunity in the workplace and not engage in harassment or discrimination based upon an individual's race, color, religion, creed, gender, pregnancy or related medical conditions, age (40 and over), sexual



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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.

### ***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, is strictly prohibited. This includes any form of harassment, bullying, intimidation or fighting. In accordance with the Company's Policies for Ethical Conduct, 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 that are being appropriately used to complete work duties. The prohibition on workplace violence applies to any Supplier doing business with or on behalf of the Company at any location.

### ***Environmental Protection and Sustainability***

Suppliers must abide by all applicable environmental laws, regulations, and standards as well as contract-specific policies and specifications in a way that protects the environment. Suppliers must conduct their operations in an environmentally responsible manner that conserves natural resources and minimizes waste, emissions, energy consumptions and the use of materials of concern. Suppliers must obtain, maintain and keep current all required environmental permits (e.g., discharge monitoring) and registrations and any operational and reporting requirements shall be followed. If applicable, Suppliers have an obligation to carry out their activities in ways that preserve a clean, safe and healthy environment, and to ensure that any hazardous materials or chemicals are appropriately managed to ensure their safe handling, movement, storage, use, reuse, recycling and disposal.

### ***Supplier Diversity***

The Company is committed to promoting diversity throughout its business, including its supply chain and strives to integrate diverse Suppliers into the execution of corporate Supply Chain strategy. The Company endeavors to provide fair and equal procurement opportunities for all qualified and competitive Suppliers. Suppliers are encouraged to adopt a similar approach with respect to their own business practices.

### ***Drugs and Alcohol***

The Company is committed to maintaining a drug-free work environment, including a workforce free from the effects of drug and alcohol abuse. Suppliers and their employees, agents, or subcontractors, must not use, possess, sell or transfer illegal or medically unauthorized drugs or be under the influence of such drugs or alcohol while engaging in Company business at any time. The Company reserves the right to remove any person from Company-occupied premises immediately should Company employees suspect that such person is under the influence of such drugs.



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### ***Intellectual Property***

All Suppliers will comply with all privacy and data protection rules and regulations, respect intellectual property rights, protect confidential information, and, without limitation, comply with the intellectual property ownership rights of the Company, including but not limited to copyrights, patents, trademarks, and trade secrets.

### ***Disclosure of Information***

In accordance with the Pennsylvania Public Utility Commission's 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. For additional information please refer to the FERC Standards of Conduct or the PA PUC Code of Conduct, 52 Pa. Code § 54.122.

### ***Business Records***

Supplier records must be accurate and appropriately detailed in accordance with the Agreement. Suppliers must not prepare, submit or transmit records, including without limitation time, expense and work records that intentionally or otherwise falsify or misrepresent the true nature of the transactions or work performed. Suppliers must follow all applicable laws and contractual requirements in creating, maintaining, and disposing of records reflecting their business dealings with the Company.

### ***Business Gifts or Payments***

Suppliers may not offer, solicit or accept anything of value to improperly influence, or appear to improperly influence, any person employed by or in a business relationship with Company. This includes, but is not limited to, bribes, kickbacks, or loans to employees or any person or company on behalf of Company. The offer or acceptance of cash gifts or gift cards to Company employees is strictly prohibited. Suppliers will consent to an audit by Company of Suppliers' records as they relate to the giving of gifts to Company employees or gifts given in connection with the Agreement. The audit will occur no more frequently than annually and Company will provide at least two weeks' notice prior to the audit.

### ***Conflicts of Interest***

Suppliers must not enter into a financial or any other relationship with a Company employee that creates any actual, potential, or perceived conflict of interest. A conflict of interest arises when the personal interests of an individual are inconsistent with the responsibilities of his/her work with the Company.

Suppliers must promptly disclose any potential conflict of interest to the Company for review prior to entering into any business transaction. If a potential conflict arises during the business relationship, it must be disclosed promptly after it becomes known. To disclose any conflict of interest, Suppliers shall contact the appropriate Company representative as follows:

Duquesne Light Company: Rob Vresko, Senior Manager, Procurement  
Duquesne Light Company  
(412) 393-8603  
[rvresko@duqlight.com](mailto:rvresko@duqlight.com)



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DQE Communications LLC:      Shawn Blanner, Director of Operations  
DQE Communications  
(412) 393-1061  
[sblanner@dqe.com](mailto:sblanner@dqe.com)

TEN, Inc.:                              Joseph Statler, Director, Construction  
TEN, Inc.  
(412) 429-8888  
[joe.statler@tensaves.com](mailto:joe.statler@tensaves.com)

### ***Enforcement***

Suppliers must take full responsibility for their compliance with this Supplier Code of Conduct and, if applicable, the Policies for Ethical Conduct. The Company is not responsible for ensuring Supplier's compliance to this Supplier Code of Conduct. In the event of any violation, Supplier must fully cooperate with any related investigation. If such an investigation identifies any Supplier misconduct, Supplier must make the appropriate corrections. The Company reserves the right to terminate its business relationship with a Supplier who fails to comply with this Supplier Code of Conduct.

### ***Reporting Concerns***

Suppliers must report actual or suspected noncompliance with this Supplier Code of Conduct. Suppliers are able to report noncompliance anonymously and confidentially to the Company's Ethical Conduct Compliance Hotline by calling 1-888-309-1563, or through the website at <https://duquesnelight.alertline.com>. The Hotline is available 24 hours a day, 7 days a week.

Retaliation of any type against any individual who in good faith reports a violation of this Code is strictly prohibited and may result in termination of the supplier relationship.