

## ***Duquesne Light Holdings' 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 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://duquesnelight.com/policies-for-ethical-conduct>.

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

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adhere to all regulatory and contract-specific safety requirements and specifications, including site-specific rules when performing work. Accidents, injuries, hazards, and unsafe activities and/or conditions should be reported promptly and without unreasonable delay 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.

Suppliers and Suppliers' subcontractors, if subcontracting is permitted, will strictly abide by all Company rules, policies and procedures when working on Company's facilities, including, without limitation, Company's "Lifesaving Safety Rules" as set forth below.

*Lifesaving Safety Rules*: The following safety provisions, to the extent that they are stricter than other applicable laws or regulations prescribed by the Company, shall be complied with by all personnel when working on Company facilities:

1. The use of Class 2 rubber gloves, sleeves, and insulated hot sticks **is required** when working on or within arms-reach (including the extended reach of any hand-held conductive object) of exposed energized electrical equipment in excess of 600V.

When working on the ground, the use of Class 2 rubber gloves and dielectric footwear **is required** when handling items that may enter the energized primary space where work is being performed on, or within arm's reach of, exposed energized electrical equipment in excess of 600V.

2. The use of personal fall protection equipment **is required** while performing work aloft from a bucket truck, platform truck, or any type of aerial equipment; or while climbing a pole or tower.
3. Prior to entering an enclosed or confined space it **is required** that the following safety measures are completed:
  - a. Testing to verify a safe atmosphere prior to and throughout the duration of the job;
  - b. Ensuring a retrieval system with a full-body harness and retrieval line is in place. If a retrieval system is impractical, ensuring that a documented retrieval plan and associated equipment are available onsite to safely rescue individuals from the space; and
  - c. When entering a manhole which contains energized cable, performing infrared inspections (thermography) on cable inside the space prior to and throughout the duration of the job to verify conditions are within Company thresholds, available upon request.

These Lifesaving Safety Rules shall be strictly enforced. Individuals observed, suspected, or

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determined to be in violation of these Lifesaving Safety Rules shall be immediately prohibited from working on Company facilities and, at the sole discretion of the Company, may not be permitted to return.

Suppliers shall be solely responsible for safe performance of work by their employees and subcontractors. Suppliers have the responsibility to make sure their employees and subcontractors receive adequate safety training for the tasks to be performed prior to their employee or subcontractor being permitted to perform any work on Company facilities. Suppliers shall review these Lifesaving Safety Rules with their employees and subcontractors. Suppliers shall determine the appropriate amount of time required to complete any applicable training. Documentation as proof of this training shall be maintained by Supplier and shall be made available upon request of Company.

### ***Fair Employment and Human Rights***

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.

### ***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

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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.

### ***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 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.

### ***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 Commitment and Responsible Business Practices***

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. Suppliers may at times, be asked to provide specific environmental data and performance to the Company for reporting purposes.

The Company is committed to designing, sourcing, and producing products and/or services that enable us to deliver a clean energy future in a responsible manner. The Company strives to conduct our business in a way that not only meets the needs of our customers and stakeholders,

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but also protects the world's finite resources that will be needed in the future. Therefore, the Company will take into consideration during supplier bid evaluations, when possible, Suppliers that:

- Invest in certifications and standards that show the supplier has an interest in developing sustainability and promoting sustainable growth (i.e., ISO 14001);
- Define metrics that measure sustainable practices and understand how they are progressing in improving existing supply chain practices (i.e., reduction in greenhouse gas emissions, a reduction in energy use, etc.);
- Are transparent in their supply chain practices; and
- Ensure subcontractors also meet the expectations within this document.

### ***Supplier Diversity***

The Company is committed to the principles of diversity, inclusion, and equal opportunity in all its endeavors, including its supply chain and strives to integrate diverse Suppliers into the execution of corporate Supply Chain strategy. The Company applies this principle in its policies and procurement activity with the objective of encouraging participation by diverse Suppliers who reflect the diversity that exists within the communities that are served by the Company. Suppliers are encouraged to adopt a similar approach with respect to their own business practices. The Company expects Suppliers to acknowledge the Company's supplier diversity program, as defined on our [website](#), and demonstrate their commitment to this business practice.

### ***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 possess, use or be under the influence of alcohol (as defined by regulation or legal requirement under Pennsylvania law) while performing their duties or otherwise engaged in Company business whether on Company property or outside of Company property. Further, 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 while conducting business with or on behalf of the Company whether on Company property or outside of Company property. 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 alcohol and/or drugs.

### ***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. If Supplier will be supplying products to

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Company, they shall identify the country (or countries) of origin of the procured Supplier products and their components and will identify the country (or countries) where the development, manufacturing, maintenance, and service for the Supplier products are provided.

### ***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, including Public Officials. This includes, but is not limited to, bribes, kickbacks, or loans to employees or any person or company on behalf of the Company. The offer or acceptance of cash gifts or gift cards to Company employees is strictly prohibited. If a gift unduly influences or makes Personnel feel obligated to "pay back" the other party with business, receipt of the gift is unacceptable. Suppliers 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. Suppliers will consent to an audit by the 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 the 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.



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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)

TEN, Inc.: Chris Niemiec, *Controller*  
TEN, Inc.  
(412) 393-4931  
[chris.niemiec@tensaves.com](mailto:chris.niemiec@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.ethicspoint.com>. The Hotline is available 24 hours a day, 7 days a week, 365 days a year.

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.