



# Supplier Code of Conduct



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## INTRODUCTION

At Portland General Electric Co. (PGE), we are committed to conducting our business with honesty and integrity, in accordance with the highest ethical and legal standards. We expect our consultants, contractors, suppliers and vendors (Suppliers) to uphold the same high standards that we set for ourselves. We understand that Suppliers are independent entities; however, their business practices can impact and reflect upon PGE.

This Supplier Code of Conduct (Code) is based on the standards that apply to all PGE employees, and provides guidance on what we expect of our Suppliers as they work for, or on behalf of PGE. Suppliers are responsible for ensuring that they, and their employees, subcontractors, and agents review, understand, and comply with both the letter and the spirit of the Code. Noncompliance can result in contract termination or removal of a supplier from consideration for future business opportunities.

No Code can address every situation that may arise, and we don't intend to here. If Suppliers have questions about what is right in a particular situation, or would like to report an ethics or compliance concern while working with PGE, they should contact one of the following resources:

- Their PGE business contact
- Their PGE buyer
- PGE's Ethics & Compliance Department: 503-464-7091; [ethics.compliance@pgn.com](mailto:ethics.compliance@pgn.com)
- EthicsPoint Hotline: 866-384-4277 or [www.EthicsPoint.com](http://www.EthicsPoint.com) (you can make reports anonymously through this channel)

PGE has a strict non-retaliation policy, and we do not tolerate retaliation of any kind against someone who reports a concern or suspected violation, or who participates in an investigation.

## STANDARDS OF CONDUCT

### LEGAL AND REGULATORY COMPLIANCE

Suppliers must comply with the letter and spirit of all applicable laws, rules, and regulations, including those prohibiting bribery (such as the Foreign Corrupt Practices Act), kickbacks, corruption, and other unethical business practices, as well as anti-trust and fair trade statutes. In addition, Suppliers must comply with federal and state energy regulatory commission-specific codes and standards of conduct.

### SAFETY, HEALTH & ENVIRONMENT

**Safety:** Safety is one of PGE's core principles, and we are committed to providing a safe and healthy place of business for our employees, customers, and the public. In support of that goal, anyone (including Suppliers) who performs work on PGE property, or elsewhere on PGE's behalf, is expected to:

- Know, understand, and perform their duties in accordance with all applicable safety and health laws, rules, regulations, and PGE safety policies and procedures applicable to their work;
- Participate in applicable PGE safety training where necessary for the specific work performed;
- Read and follow the safety manuals and other materials that apply to their job;



- Create and maintain a safe work environment to the extent the work environment is under supplier's control;
- Use and wear required safety equipment and clothing
- Immediately notify their supervisor of any hazardous condition in the workplace; and
- Report any work-related near miss, incident or injury as described in safety training

**Fitness for Duty:** Suppliers must require that their employees report to work ready and able to safely perform the requirements of their jobs without risk to themselves, others, or the environment. Suppliers must also ensure that their employees are not impaired by drugs, alcohol, disabling medical conditions, or fatigue when they are performing work for PGE or on PGE premises.

**Use of Alcohol and Drugs:** PGE is committed to maintaining an alcohol- and drug-free workplace. While on PGE property, or doing work for PGE, Suppliers' employees cannot use, possess, sell, or purchase; attempt to use, possess, sell, or purchase; or be under the influence of alcohol or any drug illegal under federal, state or local law, or any legal drug being used in an illegal manner. PGE operates in accordance with the Federal Drug Free Workplace Act and DOT regulations. As marijuana is an illegal drug under federal law, the use, possession, sale or purchase of marijuana while on PGE property or while doing work for PGE violates this Code of Conduct.

**Use of Tobacco:** The use of tobacco products, including smokeless tobacco and nicotine delivery devices such as e-cigarettes, is permitted only in areas specifically designated for that purpose.

**Workplace Violence:** PGE does not tolerate violence in any form. Suppliers cannot act or behave in any way that intimidates, threatens, or causes harm to persons or property, or is violent. If Suppliers become aware of a threat, violence, intimidation, or harm to others or PGE property, they must report it immediately. If there is a threat of imminent harm, Suppliers should contact PGE's Corporate Security department immediately. Otherwise, they may contact any of the following:

- Their PGE business contact
- Their PGE buyer
- PGE's Ethics & Compliance Department: 503-464-7091; [ethics.compliance@pgn.com](mailto:ethics.compliance@pgn.com)
- EthicsPoint Hotline: 866-384-4277 or [www.EthicsPoint.com](http://www.EthicsPoint.com)

Suppliers cannot possess weapons or materials, substances, or explosives that may be used to harm persons or property when engaged in PGE business. **This also applies to individuals with a license to carry a concealed handgun.** Security employees are exempt from this prohibition.

**Environmental Protection:** Environmental stewardship is one of PGE's Core Principles. We expect our Suppliers to abide by the letter and spirit of all applicable environmental laws, rules, regulations, and PGE policies and procedures.

## EMPLOYMENT PRACTICES AND WORKPLACE CONDUCT

**Fair Treatment:** Suppliers must comply with the letter and spirit of applicable labor and employment laws, rules, and regulations, including, but not limited to, those associated with equal opportunity, immigration, child labor, forced or compulsory labor, working hours, and wages and benefits..

**Equal Opportunity Employment:** Suppliers may not discriminate in recruitment, hiring, termination,



promotion, salary treatment, or any other condition of employment on the basis of race, color, sex, religion, national or ethnic origin, age, disability, marital status, veteran status, sexual orientation or gender identity, or genetic information. They must abide by all laws prohibiting discrimination in the workplace.

**Harassment:** Suppliers must ensure that workers who are assigned to PGE facilities or interact with PGE employees, customers, or the public do not engage in any behavior that harasses others. Harassment includes any behavior that is intended to or does create an intimidating, hostile, or offensive work environment, or interferes with an individual's work performance. It can take many forms, including verbal remarks, physical advances, or visual displays, and can be sexual or non-sexual.

## CONFLICTS OF INTEREST

**Conflicting business interests:** While engaged in PGE-related work, Suppliers must avoid all situations that could result in a real or perceived conflict with PGE's interests, or that could compromise the work they are contracted to perform on PGE's behalf. A conflict of interest occurs when a Supplier's interests, activities, or relationships influence, or appear to influence, the Supplier's ability to act in PGE's best interest. The requirement to avoid conflicts of interest also applies to situations involving immediate family members of PGE and Supplier employees. Nothing in this paragraph, however, is intended to prevent Supplier from providing goods or services to a person or entity that competes with PGE for business or customers.

Suppliers, their employees, and any subcontractors must promptly report any actual or potential conflicts of interest to one of the following:

- Their PGE business contact
- Their PGE buyer
- PGE's Ethics & Compliance Department: 503-464-7091; [ethics.compliance@pgn.com](mailto:ethics.compliance@pgn.com)
- EthicsPoint Hotline: 866-384-4277 or [www.EthicsPoint.com](http://www.EthicsPoint.com)

**Gifts to PGE Employees:** PGE understands that exchanging gifts and business entertainment can be an important and appropriate way of building and maintaining proper business relationships. However, it can also create an actual or perceived conflict of interest. Suppliers who wish to give gifts or business entertainment must understand that PGE employees can only receive gifts or business entertainment in compliance with PGE's Business Entertainment and Gifts policy. Under that policy, PGE employees may not accept gifts, entertainment, or personal favors that could affect or be perceived to affect our business judgment or decisions. For example, we cannot accept anything from a Supplier who is seeking to do business with PGE for the first time, or seeking to expand an existing business relationship. In addition, PGE employees are not permitted to ask for business entertainment, gifts, or other courtesies from a business contact. Finally, we cannot accept, nor should a Supplier ever offer, a bribe, gratuity, or kickback in any form. These rules apply to PGE employees, our families, and members of our households.

## BUSINESS CONTINUITY

Suppliers shall have plans in place to ensure that their business operations continue with minimal interruption in the event of a disaster, emergency, crisis situation, or security-related event. We further expect those suppliers to test those plans, and provide copies of their plans, exercise and training records to PGE upon request.



## **BUSINESS INFORMATION, RECORDS AND ASSETS**

**Confidential Information:** In the course of their work, Suppliers may have access to confidential information about PGE, its employees, customers, shareholders or other third parties. Suppliers are expected to preserve the privacy, confidentiality and security of such information. In addition, they must use the information for appropriate business reasons only, and in compliance with all applicable laws, rules, regulations, contractual obligations, and PGE policies and procedures. Suppliers shall report any suspected data breach immediately following detection to a PGE buyer or to PGE's Ethics & Compliance department at 503-464-7091. The obligation to protect confidential information continues even after the Supplier's work for PGE is complete.

**Intellectual Property:** Suppliers must recognize and respect the individual intellectual property rights of PGE and others. Suppliers may not use PGE's name, trademarks, logo or printed materials without the express written consent of authorized PGE personnel.

**PGE Assets:** Suppliers must use PGE assets responsibly and only for legitimate business purposes. They must also protect those assets from misuse, waste, damage, abuse, theft, and loss. Suppliers may not use PGE assets for personal purposes. PGE assets include, without limitation, PGE facilities, equipment, technology assets, networks, communication devices, records, documents, and supplies.

PGE retains the right to monitor its assets and work environment to determine compliance with applicable laws, rules, regulations, and PGE policies and procedures. Supplier shall not expect privacy while using any PGE asset.

**Accurate Records:** Suppliers must create, retain, and dispose of financial and operating records in accordance with all applicable laws, rules, regulations, and in accordance with contractual obligations with PGE. PGE reserves the right to monitor Suppliers' records that relate to work being performed for PGE.

**Insider trading:** Suppliers must comply with U.S. securities laws regarding insider trading, and shall not trade in the securities of PGE, or any other company, while in possession of material non-public information about that company. In addition, suppliers may not share such material non-public information with others. "Material" means information that a reasonable investor would consider important in making an investment decision.

**Computer and System Security:** All Supplier computers or computer systems that interact with PGE's computer network must contain the necessary security firewalls, and they must be free from any malware that could damage any PGE system. Suppliers must comply with all applicable PGE Information Security policies, standards, and procedures when their computers or computer systems interact with PGE's computer network.

*This Code of Conduct is not a contract. It does not confer rights on any Supplier, nor does it impose obligations on PGE. In case of a conflict between the Code of Conduct and your contract, the terms of your contract prevail.*