



Supplier Code of Conduct

INTRODUCTION

At PGE, we aspire to lead the way to a clean and reliable energy future for our customers. Our success in achieving our goals depends on our ability to earn and retain the respect and trust of our customers, stakeholders, and communities. To do this, we must conduct our business with honesty and integrity, in accordance with the highest ethical and legal standards, and we are committed to doing so. We also expect any entity that provides goods or services to, or performs work for or on behalf of, PGE (Supplier) to uphold the same high standards we set for ourselves.

This Supplier Code of Conduct (Code) establishes the minimum standards that Suppliers must meet when doing business with PGE and is based on the standards that apply to all PGE employees. Suppliers are responsible for ensuring that they, and their employees, subcontractors, and agents comply with this Code.

PGE may enter into agreements with particular Suppliers that contain provisions addressing some of the same issues that this Code addresses. In the event of an inconsistency between the Code and the specific contract provision, the contract provision will control.

LEGAL AND REGULATORY COMPLIANCE

Suppliers must comply with 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, fair-trade, and equal and fair employment statutes. This also includes federal and state energy-regulatory-commission-specific codes and standards of conduct.

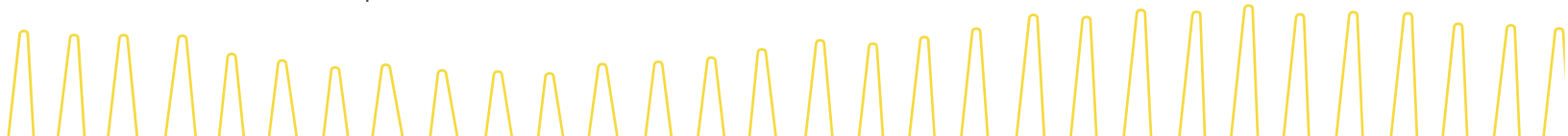
PGE expects Suppliers to have appropriate internal business processes and policies to ensure compliance with applicable law and this Code, and be able to demonstrate such compliance upon PGE's request.

SAFETY AND HEALTH

PGE is committed to providing a safe and healthy place of business for employees, customers, and the public. In support of that commitment, we have the following expectations:

Safety: Everyone (including Suppliers) who performs work for or on behalf of PGE, regardless of whether the work is on PGE property or elsewhere, must:

- (i) Comply with all safety and health laws, rules, and regulations, and PGE safety policies and procedures provided to them, that are applicable to their work.
- (ii) Participate in applicable PGE safety training where necessary for the specific work performed





- (iii) Read and follow the safety manuals and other materials that apply to their job
- (iv) Create and maintain a safe work environment to the extent the work environment is under Supplier's control
- (v) Use and wear required safety equipment and clothing
- (vi) Immediately notify their supervisor of any hazardous condition in the workplace, including hazards to the public
- (vii) 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 doing work for PGE or on PGE property.

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 may not use, possess, sell, purchase, or be under the influence of, (i) alcohol; (ii) any drug that is illegal under federal, state, or local law; or (iii) any other substance that may impair job performance. Since marijuana is an illegal drug under federal law, Suppliers may not use, possess, sell, purchase, or be under the influence of marijuana while on PGE property or doing work for PGE.

Tobacco use: While on PGE property or doing work for PGE, Suppliers may use tobacco products, including smokeless tobacco and nicotine delivery devices such as e-cigarettes, only in areas specifically designated for that purpose.

Workplace violence: PGE does not tolerate violence in any form. Suppliers must not 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 911, then notify PGE Physical Security (503-464-8600). Otherwise, they may contact any of the following:

- Their PGE business contact or buyer
- PGE's Ethics Team: ethics.governance@pgn.com or 503-464-7091
- EthicsPoint Hotline: 866-384-4277 or <http://www.ethicspoint.com/>

Generally, Suppliers may not possess weapons; ammunition; or materials, substances, or explosives that may be used to harm persons or property while on PGE property or doing work for PGE. This also applies to individuals with a license to carry a concealed handgun. Suppliers who are engaged to provide security services may be permitted to carry certain items that would otherwise be prohibited by this Code, subject to approval by the PGE Physical Security manager, and provided that the Supplier complies with all applicable laws, rules, regulations, and PGE policies and procedures provided to them.



ENVIRONMENTAL PROTECTION

PGE is committed to being a good steward of the lands, rivers and air where we operate, and we actively seek Suppliers that share our commitment. Suppliers must comply with all applicable environmental laws, rules, regulations, and PGE policies and procedures that are provided to them. PGE also encourages Suppliers to minimize any negative environmental and social impacts of the goods or services they provide.

SUPPLIER EMPLOYMENT PRACTICES AND WORKPLACE CONDUCT

Suppliers must comply with all applicable labor and employment laws, rules, and regulations, including, but not limited to, those associated with equal opportunity, freedom of association, collective bargaining, immigration, child labor, forced or compulsory labor, human trafficking, working hours, and wages and benefits. Following is additional information on some of the requirements.

Working hours, wages, and benefits: Suppliers must comply with applicable state and federal laws regulating working hours, wages and benefits. Employees must be paid on time and the amount must be at least equal to the applicable legal minimum wage and associated statutory benefits. Suppliers must further ensure that working hours, work schedules, and rest periods are consistent with applicable legal requirements, are not excessive, and do not negatively affect employees' health or safety.

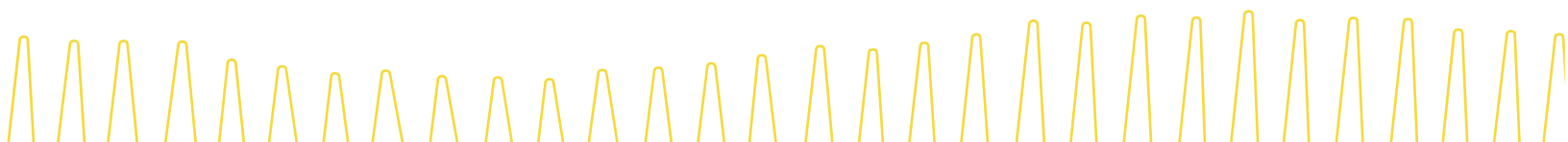
Child labor: Suppliers may not employ any person whose age is below the minimum age for employment established by applicable law.

Forced labor and human trafficking: Suppliers may not use slave, prison or any other form of forced or involuntary labor. In addition, they may not engage, directly or indirectly, in human trafficking. PGE requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement.

Freedom of association and collective bargaining: Suppliers must respect the rights of their employees to form, join, or not join trade unions or other organizations of their choosing and collectively bargain without fear of discrimination, retaliation, harassment or intimidation. In cases where freedom of association is restricted by local law, Suppliers may not obstruct alternative means of freedom of association.

Non-discrimination: Suppliers must comply with all laws prohibiting discrimination in the workplace. Suppliers may not discriminate in any aspect of employment, including, but not limited to, recruitment, hiring, termination, promotion, pay, benefits, and disciplinary actions, based on race, color, sex, religion, national or ethnic origin, age, disability, marital status, veteran status, sexual orientation, gender identity, or genetic information.

Harassment: Suppliers must treat their employees with dignity and respect and may not subject them to any form of unethical treatment, threats of violence, or other





forms of physical, mental, or sexual harassment. Suppliers must also 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.

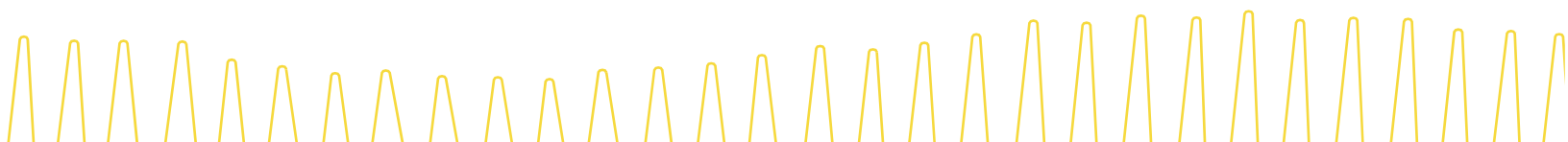
BUSINESS CONTINUITY

Suppliers must 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. Suppliers must also test those plans, and provide copies of their plans and exercise and training records to PGE upon request.

BUSINESS INTEGRITY

Anti-corruption/Anti-bribery: Suppliers must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and all other applicable anti-corruption laws. This includes never giving or receiving anything of value, including money, gifts or unlawful incentives, to improperly influence negotiations or other dealings with any person or organization, including governments and government officials, customers, or any other third parties. Suppliers will implement monitoring and enforcement procedures to ensure compliance with applicable anti-corruption laws.

Conflicting business interests: 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. While engaged in PGE-related work, Suppliers





must avoid all situations that could result in an actual or perceived conflict with PGE's interests, or that could compromise the work they are contracted to perform on PGE's behalf. 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 Suppliers 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 or buyer
- PGE's Ethics Team: ethics.governance@pgn.com or 503-464-7091
- EthicsPoint Hotline: 866-384-4277 or <http://www.ethicspoint.com/>

Gifts to PGE employees: PGE understands that exchanging gifts, meals, or entertainment with Suppliers can be an appropriate way to express gratitude, create goodwill, and strengthen business relationships. However, it can also create an actual or perceived conflict of interest or suggest improper influence. PGE policy prohibits its employees from accepting anything of value that could affect or be perceived to affect their business judgment or decisions. For example, they cannot accept anything from a Supplier who is seeking to do business with PGE for the first time, or expand an existing business relationship. Also, PGE employees may not ask for anything of value from a business contact. Finally, employees cannot accept, and Suppliers must never offer, a bribe, gratuity, or kickback in any form. These rules apply to PGE employees, their families, and members of their households.

Conflict minerals: Suppliers will maintain a policy reasonably assuring that any tantalum, tin, tungsten, and gold in products they manufacture is not sourced from entities that directly or indirectly finance conflict in or near the Democratic Republic of the Congo. Suppliers will exercise, and will make available to PGE upon request, due diligence on the source and chain of custody of these minerals.

Information protection: If, in the course of their work, Suppliers are granted access to nonpublic information about PGE, its employees, customers, shareholders, or other third parties, they must:

- (i) preserve the privacy, confidentiality, and security of such information;
- (ii) use the information only for PGE business reasons, and in compliance with all applicable laws, rules, and regulations; and
- (iii) report any suspected data breach immediately following detection to one of the following:
 - Their PGE business contact or buyer
 - PGE's Ethics Team: ethics.governance@pgn.com or 503-464-7091
 - EthicsPoint Hotline: 866-384-4277 or <http://www.ethicspoint.com/>

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: PGE assets include, without limitation, PGE facilities, equipment, technology assets, networks, communication devices, records, documents, and supplies. Suppliers must use PGE assets only for legitimate business purposes, and in compliance with all applicable laws, rules, and regulations. They must also protect those assets from misuse, waste, damage, abuse, theft, and loss. Suppliers may not use PGE assets for personal purposes. PGE reserves the right to monitor the use of, and examine or search, PGE assets used by Suppliers. Suppliers must 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, and regulations. 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 may not trade in the securities of PGE, or any other company, while in possession of material nonpublic information about that company. In addition, Suppliers may not share such material nonpublic 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 provided to them when their computers or computer systems interact with PGE's computer network.

Publicity: Suppliers may not make any announcements or release any information on behalf of PGE to any member of the public, press, official body, business entity, or other person, or claim or imply any endorsement by PGE or its employees, without the express written consent of authorized PGE personnel.

ASKING QUESTIONS AND REPORTING CONCERNS

No Code can address every situation, and we don't intend to do so here. If Suppliers have questions about what's 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 or buyer
- PGE's Ethics Team: ethics.governance@pgn.com or 503-464-7091
- EthicsPoint Hotline: 866-384-4277 or <http://www.ethicspoint.com/>

NOTE: The hotline is operated by an independent company that specializes in receiving reports of misconduct and other concerns. It's available 24/7, and



permits anonymous reporting. Translation services are available. PGE prohibits retaliation of any kind against someone who reports a concern or suspected violation, or who participates in an investigation.

AUDITING AND NONCOMPLIANCE

Suppliers must ensure that adequate and effective management systems, policies, procedures, financial documentation and training are in place to ensure ongoing compliance with this Code. PGE reserves the right to verify Suppliers' compliance through internal and external assessment mechanisms including inspecting Suppliers' facilities, operations, and books and records, including documents certifying a Supplier's status as a diverse supplier, if applicable. Suppliers will cooperate with any information requests or audits PGE may initiate to determine if they are complying with this Code. Noncompliance may result in contract termination or removal of a Supplier from consideration for future business opportunities, in addition to any other rights or remedies available to PGE.

This Code does not confer rights on any Supplier, nor does it impose obligations on PGE.

