

BERKSHIRE HATHAWAY ENERGY  
**CODE OF BUSINESS CONDUCT**



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## OUR CORE PRINCIPLES

### **CUSTOMER SERVICE**

We are focused on delivering reliability, dependability, low prices and exceptional service to our customers. We are committed to providing innovative solutions that our customers want and need.

### **EMPLOYEE COMMITMENT**

We equip employees with the resources and support they need to be successful. We encourage teamwork and provide a safe, rewarding, equitable and inclusive work environment. We make no compromise when it comes to safety and security.

### **ENVIRONMENTAL RESPECT**

We are committed to using natural resources wisely and protecting our environment for the benefit of future generations. Our Environmental RESPECT Policy details this commitment in the areas of Responsibility, Efficiency, Stewardship, Performance, Evaluation, Communication and Training.

### **REGULATORY INTEGRITY**

We adhere to a policy of strict regulatory compliance and pursue frequent, open communication with regulators regarding our business performance.

### **OPERATIONAL EXCELLENCE**

Together with our employees, we pride ourselves on excellence in every aspect of our work. Our high standards for operations and system maintenance enable us to meet and exceed our customers' expectations, perform our work safely and preserve our assets.

### **FINANCIAL STRENGTH**

We are excellent stewards of our substantial financial resources. Backed by Berkshire Hathaway Inc., we invest in hard assets and focus on long-term opportunities that will contribute to the future strength of the company.



## DEAR EMPLOYEE

As an employee of Berkshire Hathaway Energy, its subsidiaries and affiliates, you will always be required to adhere to the highest level of ethical conduct and fair dealing. We are committed to compliance with all laws in every country where we do business. Our expectations regarding compliance are outlined in the Berkshire Hathaway Energy Code of Business Conduct. We ask you to manage your activities to comply with all laws, rules, safety regulations and corporate policies.

The code provides information about how you should conduct business on behalf of the company and its subsidiaries and affiliates. The code does not provide a summary of all company policies and procedures, but instead provides a broad view of how you should approach your work, business relationships, decisions and actions.

As a member of our team, you are expected to accept responsibility, make a personal commitment to excellence and lead others by example. Successful employees at our company will demonstrate:

- Honesty
- Loyalty
- Discipline
- Uncompromising character
- Continuous learning

The policies outlined in the code apply to you. Do not hesitate to ask for information if you are in doubt about what is expected of you. If, at any time, you have a question about compliance, please ask your manager, human resources representative or the legal department for clarification.

You can take pride in being a part of our team. Our continued reputation for excellence depends on each employee adhering to the business standards and legal ethics set forth in this Code of Business Conduct.

Mark A. Hewett  
President and CEO  
Berkshire Hathaway Energy



# TABLE OF CONTENTS

CODE OF BUSINESS CONDUCT INTRODUCTION	4
---------------------------------------	---

---

Accountability
Additional Responsibilities of Managers
Protection Against Retaliation
Fair Dealing

YOUR OBLIGATIONS WHEN WORKING WITH CUSTOMERS AND OTHERS OUTSIDE THE COMPANY	6
---	---

---

Treatment of Customers
Antitrust Compliance and Competition
Confidentiality of Client and Business Partner Information
Gifts and Entertainment
Improper Payments/Trade Sanction Laws
Communicating With the Government and the Public
Political Activities
New and Emerging Technologies
Trade Associations and Organizational Memberships

YOUR OBLIGATIONS TO FELLOW EMPLOYEES	11
--------------------------------------	----

---

Equal Employment Opportunities
Discrimination and Harassment
Workplace Violence
Workplace Safety

YOUR OBLIGATIONS TO THE COMPANY	13
---------------------------------	----

---

Conflicts of Interest
Financial Controls
Intellectual and Informational Property Rights and Usage
Confidentiality of Company Information
Disciplinary Action for Violation of Rules
General Rules
Use of Company Name and Endorsements

ENVIRONMENTAL RESPECT	22
-----------------------	----

---

CONCLUSION/REPORTING VIOLATIONS	23
---------------------------------	----

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The Ethics and Compliance Hotline
Reporting Violations of the Code and Other Helpful Resources

This Code of Business Conduct supersedes previous policy statements on the same subject and may be amended or discontinued at any time without notice. Depending upon the particular circumstances of a given situation, the company's actions and the actions of its subsidiaries and affiliates may vary from this written code. The contents of this policy DO NOT CONSTITUTE THE TERMS OF A CONTRACT OF EMPLOYMENT, and nothing contained in this code should be construed as a guarantee of continued employment. Employment at-will in the U.S. means that either the employee or the company may terminate the employment relationship at any time and for any reason not expressly prohibited by law. All references to company contained in this code mean Berkshire Hathaway Energy and its subsidiaries and affiliates. For convenience, the term employee will be used in the code to refer to employees, officers, directors and agents of all direct and indirect subsidiaries and affiliates of the company. In addition, the term manager will be used in the code to refer to managers and supervisors of the company.

In the U.K., employees are subject to written terms and conditions or personal contracts that cover their employment. This code does not alter or modify existing terms and conditions or personal contracts.

# CODE OF BUSINESS CONDUCT INTRODUCTION

**BERKSHIRE HATHAWAY ENERGY AND ITS SUBSIDIARIES AND AFFILIATES EXPECT AT ALL TIMES TO MAINTAIN THE HIGHEST ETHICAL STANDARDS IN THE CONDUCT OF THE COMPANY'S BUSINESS.**

This Code of Business Conduct goes beyond rules set by law, as we know the trust of our employees and the

## HOW DO I KNOW THE RIGHT THING TO DO?

When things are not clear, ask yourself:

- Are there any laws, policies or procedures that address this situation? What about the spirit of the law or policy?
- Am I looking at this situation objectively, or am I so emotionally involved that I should get help?
- What are the motivations of the others involved?

public in the company is both a serious responsibility and a strong tradition. This Code of Business Conduct applies to all company directors, officers and employees, as well as to directors, officers and employees of each subsidiary and affiliate of the company. The purpose of this code is to set forth the business ethics of the company in a written format that provides clear guidance to the employees of the company. This code serves to (1) emphasize the company's commitment to ethics and compliance with the law; (2) set forth minimum standards of ethical and legal behavior; (3) provide reporting mechanisms for known or suspected ethical or legal violations; and (4) help prevent and detect

wrongdoing. Each employee must comply not only with the letter of this code but also the spirit. By following the policies embodied in this code, we will continue the tradition of integrity in all of the company's business dealings.

## ACCOUNTABILITY

**EVERY EMPLOYEE IS RESPONSIBLE FOR THEIR OWN ACTIONS.** The company holds each employee, regardless of position or status, accountable for complying with the code, company policies and the law. If you do not understand applicable laws, company policies or the company's expectations for your behavior, you have a responsibility to ask a manager or to contact one of the resources listed in the back of this code.

Failure to live up to the responsibilities set forth in this code, either directly, by failure to report a violation or by withholding information related to a violation, can result in discipline up to and including termination of employment. Furthermore, since many provisions of this code and our policies are based on legal requirements, violations may also subject the individuals involved and the company to criminal penalties, including fines, jail sentences or civil sanctions.

"I want employees to ask themselves whether they are willing to have any contemplated act appear the next day on the front page of their local paper – to be read by their spouses, children and friends – with the reporting done by an informed and critical reporter."

Warren Buffett

## ADDITIONAL RESPONSIBILITIES OF MANAGERS

**MANAGERS HAVE THE ADDITIONAL RESPONSIBILITY OF CREATING AND SUSTAINING AN ETHICAL WORK ENVIRONMENT.** Managers are expected to lead by example. Managers must communicate the code and relevant company policies to all of their direct reports and help them understand these requirements.

### SPEAK UP

If you are aware of any violations of this code, our policies or the law, you must report them. Speak to your manager, your human resources representative, the legal department, the Ethics and Compliance Hotline or any other contact listed in the back of this code.



This means not only allowing but also encouraging employees to ask questions, make suggestions and report wrongdoing. Managers must be vigilant to prevent violations of the code, our policies or the law. When allegations of wrongdoing are brought to their attention, managers must work closely with other members of management, any appropriate human resources personnel, the appropriate security, audit or legal department personnel, and any other company representatives as the circumstance dictates to take prompt action to investigate and ensure that appropriate steps are taken, including any necessary corrective or disciplinary action.

## PROTECTION AGAINST RETALIATION

**YOU MAY REPORT ETHICAL VIOLATIONS IN CONFIDENCE WITHOUT FEAR OF RETALIATION.** No retaliatory action of any kind will be permitted against anyone making such a report in good faith. In many instances, retaliation is against the law. Good faith reporting of violations or possible violations will not result in adverse consequences to the person reporting them, even if the perceived violations are ultimately proven not to have occurred. If your situation requires that your identity be kept secret, your anonymity will be protected to the maximum extent possible, consistent with the company's legal obligations.

However, if a report is made in bad faith – for instance, if a false or misleading report is made in a deliberate effort to get someone in trouble (as opposed to an honest mistake) – the person making the report may be subject to disciplinary action.

## FAIR DEALING

**DEAL FAIRLY WITH CUSTOMERS, SUPPLIERS AND COMPETITORS.** You are expected to act in good faith, with due care, and shall engage only in fair and open competition by treating competitors, suppliers, customers and colleagues ethically. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.

## YOUR OBLIGATIONS

# WHEN WORKING WITH CUSTOMERS AND OTHERS OUTSIDE THE COMPANY

## TREATMENT OF CUSTOMERS

**BE HONEST WITH CUSTOMERS.** Treat them with respect and dignity and promise only what you can deliver. Satisfied customers are the key to the company's success, and our reputation must be one of high integrity. Earn our customers' continued loyalty every day by treating them fairly, delivering the products and services they want and exceeding their expectations.

## ANTITRUST COMPLIANCE AND COMPETITION

**ANTITRUST LAWS, KNOWN IN SOME COUNTRIES AS COMPETITION LAWS, HAVE BEEN DESIGNED TO PROMOTE COMPETITION.** It is the policy of the company to comply with all

governmental antitrust laws and regulations. It is fundamental that the company independently determine the pricing, delivery dates, commissions and other contractual terms offered to customers. You are expected to adhere to these principles and monitor compliance by subordinates. The following conduct is illegal and prohibited by the company:

- **PRICE FIXING.** This includes oral, tacit and implied agreements or understandings to adhere to certain prices. Almost any communication among competitors relating in any way to current or future prices or other terms and conditions of sale or purchase should be avoided.
- **BID RIGGING.** This involves any agreement to refrain from bidding, to bid at a certain price or to submit a protective bid (a bid that is obviously less favorable than a competitor's bid).
- **TERRITORIAL OR CUSTOMER ALLOCATION.** Any agreement among competitors that contemplates or results in a division or allocation of customers or territories to be served is prohibited.
- **REFUSAL TO DEAL.** Agreements among competitors to refuse to sell or to purchase from any person are prohibited.
- **RECIPROCITY AND TRADE RELATIONS.** You should make sales on the basis of excellence of product and service, fair pricing and honest practices. Purchases must be made on the basis of quality, service and price. Do not seek, obtain or retain business by agreeing to purchase supplies from a particular customer. Decisions to purchase and sell must be made independently of each other.
- **TYING ARRANGEMENT.** Do not condition or tie the sale of any regulated service to the sale of any competitive product or service.

Competition law issues may be very complex. As such issues arise, you should review this code and discuss any issues with the legal department.

## THE ETHICS AND COMPLIANCE HOTLINE

A hotline is available for reporting unethical and illegal acts. Unethical and illegal acts can cause serious loss to the company, its employees and its customers. Some common examples of unethical and illegal acts are:

- Destroying, altering or falsifying company records
- Accounting or auditing irregularities
- Kickbacks
- Retaliation against whistleblowers
- Conflicts of interest
- Misuse of company assets, including theft, fraud, waste and abuse
- Unauthorized discounts
- Bribery
- Violations of antitrust, environmental or other governmental compliance regulations

Reports to the hotline may remain anonymous, and those who choose to provide their name will have their identity protected to the extent allowed by law.

Hotline reports can be submitted through [www.brk-hotline.com](http://www.brk-hotline.com). For employees in the U.S. and Canada, the hotline can also be reached by calling 800-261-8651. For employees in the U.K., call 0800-031-8202.

Issues related to job performance, harassment or discrimination and employee disputes should first be reported to your local human resources representative.



## CONFIDENTIALITY OF CLIENT AND BUSINESS PARTNER INFORMATION

**MAINTAIN THE CONFIDENTIALITY AND SECURITY OF SENSITIVE INFORMATION OF CLIENTS AND BUSINESS PARTNERS.** Your knowledge of confidential information about the company's clients and business partners places you in a special position of trust. Maintain that trust by protecting such confidential information as if it were your own.

## GIFTS AND ENTERTAINMENT

### THE PURPOSE OF BUSINESS ENTERTAINMENT AND GIFTS IN A COMMERCIAL SETTING IS TO CREATE GOODWILL AND SOUND WORKING RELATIONSHIPS.

Except as provided in this section, you must neither solicit nor accept gifts, in cash or in kind, from persons or companies attempting to acquire business from the company or from customers, vendors, governmental bodies, labor organizations or other individuals or entities doing business with the company. Gifts include favors, money, goods or services.

Gifts include favors, money, goods or services.

You should be aware of governmental restrictions, entertainment rules and recruiting prohibitions that limit such activity. Contact the legal department if you have any question about what is appropriate. Avoid social invitations from customers or suppliers where the cost to the host would appear to be excessive.



### BUSINESS PARTNERS

Do not do business with others who are likely to harm the company's reputation. All arrangements with third parties must comply with company policy and the law. Never use a third party to perform any act that you, as an employee, would be prohibited from engaging in directly.

Where not specifically prohibited by law, it is appropriate to accept and give reasonable gratuities in the ordinary course of a business relationship where custom and practice dictate that such conduct is appropriate.

These situations include, but are not limited to:

- Customary gifts at holidays or special occasions
- Free meals, entertainment or travel in the course of a business meeting or business relationship
- Unsolicited advertising or promotional materials

Expenditures by either party of a value in excess of \$100, or its monetary equivalent in foreign currency, per individual are to be avoided. When entertaining customers or suppliers, the cost and nature of the entertainment should be planned and carried out in a way that appropriately and reasonably furthers the conduct of the business of the company. Employees must report any gifts received from an existing or prospective customer, vendor or counterparty to their supervisor, with the exception of promotional gifts of minimal or de minimis value or meals shared with the employee in the context of a reasonable business purpose. If an employee suspects the value is over \$100, the employee must also report the gift by contacting the human resources department or the legal department. Gifts over \$100 in value may not be accepted or kept without approval in writing from the supervisor and the legal department. Employees should also refer to the [Berkshire Hathaway Energy Prohibited Business Practices Policy](#).

## IMPROPER PAYMENTS/TRADE SANCTION LAWS

**ALL COUNTRIES PROHIBIT THE BRIBERY OF THEIR OWN PUBLIC OFFICIALS AND MANY ALSO PROHIBIT THE BRIBERY OF OFFICIALS OF OTHER COUNTRIES.** Under the U.S. Foreign Corrupt Practices Act and the Canadian Corruption of Foreign Public Officials Act, it is illegal to offer, pay or promise money or anything of value to any foreign governmental official, political party or candidate for political office (or to anyone else who might turn over money or anything of value to such person or political party) for the purpose of directly or indirectly obtaining or retaining business. Also, the company can be held liable under the U.S. Foreign Corrupt Practices Act for the actions of its non-U.S. subsidiaries. The company strictly prohibits these activities and requires all employees to comply with laws regulating their relations with governmental officials. Violations of law could subject the company to serious fines, and those individuals who violate these laws may be subject to a prison sentence and personal fine.

**COMPLYING WITH U.S. ECONOMIC AND TRADE SANCTIONS LAWS.** The company expects its employees to abide by the U.S. Department of Treasury's Office of Foreign Assets Control, or OFAC, sanctions program. OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers and those engaged in activities related to the proliferation of weapons of mass destruction and other threats to the national security of the U.S. Failure to comply with these laws and regulations can severely damage the company and expose the company and its employees to criminal charges. Employees with questions or concerns about trade laws or who need help determining whether a person, company or country is subject to trade sanctions should check with the legal department.

**IMPROPER PRACTICES.** Entertainment, gifts or cash payments should not be used to influence individuals or groups who are in a position to award contracts or affect the award of contracts, business or other benefits to the company. Bribes and kickback payments to influence agents or employees of any third party are strictly prohibited and may violate various national laws including bribery, federal wire and mail fraud laws. The U.K. Bribery Act prohibits all bribery by, or on behalf of, a company that is incorporated or carrying on business in the U.K. Requesting or accepting a bribe is also a crime. The law covers bribery that takes place anywhere in the world. Facilitation payments are illegal under this law.

**RELATED PARTY TRANSACTIONS.** Related parties exist where:

- An officer or director of the company is also an officer or director of a related business entity
- An officer or director of the company has a significant financial interest in a related business entity through the beneficial ownership of any class of securities or otherwise
- Any trust in which an officer or director of the company has a substantial interest or serves as a trustee or in a similar fiduciary capacity
- A relative of an officer or director of the company is in an organization where there can be significant influence as a result of business transactions

Any officer or director who is in such a position must make full disclosure to the legal department for determination as to whether a transaction between the company and the related party is appropriate under the circumstances and otherwise is in the best interests of the company. Depending upon the circumstances, regulatory approval may be required prior to consummating a related party transaction.

## COMMUNICATING WITH THE GOVERNMENT AND THE PUBLIC

THE COMPANY IS COMMITTED TO MAKING FULL, FAIR, ACCURATE, TIMELY AND UNDERSTANDABLE FINANCIAL DISCLOSURES TO GOVERNMENTAL AGENCIES AND THE PUBLIC. Where applicable, you should provide thorough and accurate financial and accounting data for inclusion in such disclosures. You should not knowingly conceal or falsify information, misrepresent material facts or omit material facts necessary to avoid misleading the company's independent public auditors or investors.

You must follow strict guidelines regarding the release of company-related information to the public. To ensure that public disclosures are handled properly, the legal department and corporate communications department coordinate all such disclosures. All media requests for statements on behalf of the company should be forwarded to corporate communications.

## POLITICAL ACTIVITIES

THE COMPANY ENCOURAGES YOU TO BE POLITICALLY ACTIVE BY COMMUNICATING WITH YOUR NATIONAL, FEDERAL, STATE AND LOCAL ELECTED OFFICIALS; VOTING; ATTENDING CAUCUSES; AND HELPING WITH CAMPAIGNS. However, you cannot use company resources for the purpose of supporting, directly or indirectly, any political issue, any political party (foreign or domestic) or the campaign of any candidate for political office. Further, you will not be reimbursed for personal political contributions or the cost of attendance at any political activity. Nothing herein is intended to prohibit support of political candidates or issues through lawful political action committees or individual support allowed by law. It is company policy to follow ethical standards of behavior in dealings with governmental customers. You must always act to avoid any impropriety or even the appearance of impropriety.



### INTERNAL AND EXTERNAL INVESTIGATIONS, SUBPOENAS AND GOVERNMENTAL INQUIRIES

When violations of the Berkshire Hathaway Energy Code of Business Conduct or other company policies and rules are reported, the company will conduct a fair and impartial investigation into the reported violation. All directors, officers and employees are to cooperate fully by providing complete information and documents as requested.

In addition, the company fully cooperates with requests for information from governmental officials. Contact the legal department before responding to any governmental subpoenas or non-routine requests (including interview requests seeking a statement or official position of the company). If after consulting with the legal department, you provide information to a government representative, anything you provide must be truthful and complete.

Records or documents relevant to litigation or an investigation must never be altered, falsified, covered up, concealed, mutilated or destroyed.

**POLITICAL GIFTS.** National, federal, state and local laws restrict the offer, promise or gift of anything of value to an employee, agent or official. It is the policy of the company not to offer, promise or make any gift to any local, state, federal or foreign governmental employee, agent or official, except as allowed by law and authorized by a corporate officer.

**ENTERTAINMENT.** Entertainment is generally viewed as simply a type of gift; therefore, the same rules apply as those referenced previously in this code.

**MEALS.** Generally, regulations permit a company to supply refreshments or meals only if such service would facilitate the conduct of official business and if the public official cannot determine a value for the official's share of the food provided. Regulations vary among the different governmental bodies, and no refreshments or meals should be provided unless expressly authorized by the governmental body's stated policy. No refreshments or meals may be provided to those public officials who serve in a procurement function for goods and services provided by the company.

Any questions you have about appropriate activities should be directed to the legal department.

## **NEW AND EMERGING TECHNOLOGY**

Companies face increasingly sophisticated cyber threats from foreign intelligence services, criminal groups, hacktivists and insiders. These attacks, which include ransomware, identity theft and deepfake-enabled fraud, pose serious risks to infrastructures, reputation and legal compliance. In some cases, company-issued equipment is mailed to U.S.-based facilitators who install remote access tools to enable the fraud. Employees must diligently protect critical data through increased cyber diligence and efforts. Work closely with the legal, IT security and human resources departments with any questions.

## **TRADE ASSOCIATIONS AND ORGANIZATIONAL MEMBERSHIPS**

**YOU ARE ENCOURAGED TO BELONG TO TRADE ASSOCIATIONS WHEN SUCH GROUPS CONTRIBUTE SIGNIFICANT BENEFITS SUFFICIENT TO JUSTIFY THE TIME AND COST OF MEMBERSHIP OR SUPPORT.**

By their nature, trade associations involve meetings and discussions with competitors, and care must be taken to avoid antitrust problems. You must obtain permission from a corporate officer before joining a trade association and before you appear at any meeting as a speaker or member of a panel where statements will be made on behalf of the company. Contact corporate communications for guidance and assistance if you speak on a panel.

You are encouraged to participate in charitable, educational or community activities on personal time or where your participation does not interfere with work performance and is approved by your manager. The company may encourage certain employees, depending upon their positions, to become members of organizations such as the chamber of commerce or professional or technical organizations to provide company representation, networking and employee development. Where this type of membership is approved in advance, the company will reimburse reasonable expenses incurred as a result of participation.

## YOUR OBLIGATIONS TO FELLOW EMPLOYEES

### EQUAL EMPLOYMENT OPPORTUNITIES

#### WE ARE COMMITTED TO FAIR EMPLOYMENT

**PRACTICES.** The company respects the differences and unique talents and background of every employee. We support an inclusive workplace that enriches the lives of our employees, enhances the communities in which we live and work and delivers positive business results. Inclusion is a critical component of a sustainable business and should be considered in all business decisions, including decisions regarding community investments, customer service solutions, and hiring, promoting, developing and retaining employees.

It is the policy and practice of the company to provide equal employment and promotional opportunities to all employees based upon their abilities, achievements and experience without regard to race, color, religion or religious creed, age, national origin, ancestry, citizenship status (except as required by law), gender, gender identity, gender expression, sex, pregnancy, sexual orientation, genetic information, physical or mental disability, veteran or military status, marital status or any other status as provided by the laws of the country where we do business (hereinafter "Protected Categories"). The company is committed to observing those laws that pertain to freedom of association, privacy, recognition and the right to engage in collective bargaining and to otherwise fully comply with all applicable employment discrimination laws wherever we do business. This applies to all aspects of the company's employment decisions, including recruitment, hiring, placement, development, promotion, training, scheduling, benefits, compensation and termination. If a conflict arises among the requirements of this policy and the laws, customs or practices of a particular area, consult with the legal department to determine the most appropriate course of action.



#### TREAT OTHERS WITH MUTUAL RESPECT, TRUST AND COMMITMENT

You are personally responsible for creating and maintaining a welcoming and inclusive workplace and honoring the company's commitment to equal employment opportunity. Treat other employees with mutual respect, trust and commitment to maintain a workplace in which all employees have the opportunity to contribute to organizational results. Employee commitment is critical to the company's success and has always been part of who we are as an organization. Creating a welcoming and inclusive workforce allows us to tap into a broader pool of talent, fostering engagement and driving successful business performance aligned with our six core principles.

## DISCRIMINATION AND HARASSMENT

**WE DO NOT TOLERATE HARASSMENT OF ANY KIND, INCLUDING SEXUAL HARASSMENT, RACIAL HARASSMENT OR ANY OTHER TYPE OF BEHAVIOR THAT IS HOSTILE, DISRESPECTFUL, ABUSIVE OR HUMILIATING.** Sexual harassment occurs when one person requires another to submit to unwelcome sexual advances as a basis for employment decisions, makes requests for sexual favors or engages in other unwelcome conduct of a sexual nature. Sexual harassment also can occur when such conduct unreasonably interferes with an employee's work performance or creates an intimidating, hostile or offensive working environment (such as sending sexually oriented e-mails at work). Although we all have responsibility to report any incidents of harassment that we witness or experience, managers are specifically required to report to their human resources representative all harassment complaints (both formal and informal) they receive involving Protected Categories. Other unacceptable forms of harassment include belittling or humiliating subordinates or co-workers, derogatory comments, insults and jokes that target a certain group based upon a Protected Category.

A complete copy of the company's policy addressing discrimination and harassment is available. Ask your manager for a written copy of the policy or contact your human resources representative or any corporate official listed in the back of this code. The company has zero tolerance toward any violation of this policy, and every employee has a responsibility to comply with this policy.

## WORKPLACE VIOLENCE

**WE DO NOT TOLERATE WORKPLACE VIOLENCE OF ANY KIND.** Actions that are intimidating or threatening are likewise prohibited. Further, to help ensure a safe work environment for all employees, no employee may use or possess any firearm or other weapon while on company premises or while conducting business on behalf of the company except as approved by the president of the company or otherwise permitted by law. Contact your manager if you witness or experience any threatening or actual incidents of violence in the workplace.

## WORKPLACE SAFETY

**WE ARE COMMITTED TO PROVIDING A SAFE AND HEALTHY ENVIRONMENT FOR ALL EMPLOYEES.**

Every effort must be made to develop and maintain a safe and healthy environment for employees and the public. To that end, you are expected to have a thorough and specific knowledge of all operating and safety rules that relate to your job assignment. Every employee is responsible for safety compliance. You must operate all company equipment in a safe manner at all times, and extreme care must be exercised to prevent damage or injury to people, equipment or property. Any injuries, damages or defects caused or discovered must be reported immediately to your manager. All accidents, environmental concerns and dangerous situations must be promptly reported to your manager or human resources representative.



### BE SENSITIVE TO OTHERS

What may seem funny or harmless to some people can be hurtful or degrading to others. Be sensitive to how others could perceive your words or behavior. Always speak and treat others in a civil, professional manner. If a joke, comment or action might be taken as threatening, hurtful, offensive or insulting, avoid it.

# YOUR OBLIGATIONS TO THE COMPANY

## CONFLICTS OF INTEREST

**AVOID CONFLICTS OF INTEREST.** A conflict of interest occurs when you (or a family member or relative) have a personal interest or involvement in an activity that could interfere with your ability to perform your job in an objective, impartial and effective manner. An apparent conflict of interest occurs when personal interests or activities could lead others to doubt your objectivity or impartiality. A family member or relative includes the following: spouses (including those who live together in a common-law relationship), intimate or romantic partners, parents and stepparents, children and stepchildren, siblings and stepsiblings, extended family (cousins, uncles, aunts, nephews and nieces) and in-laws.

Conflicts of interest also may arise if you or members of your family receive improper personal benefits as a result of your position at the company. Loans to or guarantees of obligations of employees and their family members may create conflicts of interest.

You must avoid personal conflicts of interest or the appearance of such conflicts that could reflect adversely on you or the company. Avoid direct or indirect involvement or management in business activities that compete with the company, that have a business relationship with the company or that could otherwise be contrary to the company's interest.

- You may not own more than a 2% interest in any publicly traded company that is a supplier, customer or competitor engaged in the same business as the company
- You must not directly or indirectly sell goods or services to the company or otherwise act as a service provider or vendor to the company
- You must not take advantage of your position at the company to earn a personal profit from company property, information or business opportunities



## AVOID CONFLICTS

While it is impossible to list all situations that could constitute a conflict of interest, the following are some examples:

- Using company property, information or your position at the company for personal gain. This includes taking personal advantage of opportunities for financial gain that are discovered in the course of your work and in which the company may have an interest
- Having ownership or economic interest in a company that does business with the company if you are in a position to influence Berkshire Hathaway Energy's relationship with the company
- Having decision-making authority or influence over a company vendor where the vendor representative is a friend, family member or former company colleague
- Having outside employment or fee-earning arrangements that interfere with your ability to perform your job
- Competing with the company or violating our policies on investing in a competitor

To ensure no conflict of interest exists, either directly or indirectly, you are required to obtain approval from the legal department before accepting employment, offices or board positions in other for-profit businesses, or having your own business if it raises a potential conflict of interest or appearance of a conflict of interest. If you think you may have a conflict of interest, or even the appearance of a conflict of interest, you are required to immediately disclose the circumstances to the legal department for guidance. All directors and executive officers of the company and its subsidiaries shall disclose any material transaction or relationship that reasonably could be expected to give rise to such a conflict to the legal department. No action may be taken with respect to such transaction or party unless and until such action has been approved by the legal department.

## **FINANCIAL CONTROLS**

**THE COMPANY WILL MAINTAIN ACCOUNTING RECORDS AND INTERNAL CONTROL PROCEDURES CONSISTENT WITH THIS CODE AND THE LAWS AND REGULATIONS APPLICABLE TO THE COMPANY IN COUNTRIES WHERE WE DO BUSINESS.** Specifically:

- No undisclosed or unrecorded funds or assets shall be established
- No false or artificial entries shall be made in any books or records for any reason, and no employee shall agree to any arrangement that results in such an act
- No payment shall be approved or made with the intention that it is to be used for any purpose other than as described by the document supporting the payment
- All transactions related to the purchase of goods and services must comply with established company procurement procedures

The chair, CEO and each senior financial officer shall identify and report any information he or she may have concerning (a) significant deficiencies in the design or operation of internal control over financial reporting that could adversely affect the company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the company's financial reporting or disclosures or internal control over financial reporting.

## **INTELLECTUAL AND INFORMATIONAL PROPERTY RIGHTS AND USAGE**

**ALL INTELLECTUAL AND INFORMATIONAL PROPERTIES THAT ARE GENERATED BY AN EMPLOYEE OR CONTRACTOR ON COMPANY TIME OR WITH COMPANY RESOURCES ARE THE SOLE AND EXCLUSIVE PROPERTY OF THE COMPANY.** The obligation of employees to protect the company's assets includes its proprietary information. Intellectual and informational properties include:

- Patents, copyrights, inventions, trade secrets, programs, documentation, videos, advertising, artwork, etc.
- Any development, idea, technology, product improvement or discovery in any medium or form
- Messages sent via e-mail or voicemail
- Information created on or stored in company or employee time management planners, paper files, diskettes, personal computers, memory sticks, compact discs or similar media
- Business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information gained through an essential function of your position and any unpublished financial data and reports

Unauthorized use or distribution of intellectual and informational property would violate company policy. It could also be illegal and result in civil or criminal penalties.

Computer equipment, cell phones, mobile devices, proprietary programs, software and communication systems, such as e-mail, voicemail and phone systems, are the property of the company. The company provides these systems and devices at its expense and intends the systems be used for company business. Various policies are published by the businesses to advise employees about company monitoring activity, waiver of privacy and appropriate use and access of company computer, phone and mobile device equipment. While the use of a personal device for business purposes is discouraged, if an employee uses a personal device for business purposes, the company also reserves the right to monitor and access any and all business communication on the personal device, including access to e-mail and text messages. Ask your manager for a copy of the policy that applies to you.



## KEEP IT SECURE

Protect confidential information, whether it relates to the company, customers or co-workers.

- Access confidential information and share it with co-workers only on a need-to-know basis
- Due to security reasons, and to respect the privacy of co-workers, do not share confidential information with anyone outside the company unless legally required or as authorized in advance by the chief legal officer or legal department
- Password protect your computer
- Lock confidential papers in your desk or cabinet before leaving your workstation
- Be careful not to discuss confidential information in a place where others may hear. Although there is often a temptation to discuss the company with friends and family in relaxed informal settings, remember these rules apply in all situations

## CONFIDENTIALITY OF COMPANY INFORMATION

**KEEP CONFIDENTIAL AND SAFE ALL INTERNAL INFORMATION, DOCUMENTS AND TRADE SECRETS OF THE COMPANY.** Except as necessary in the course of the company's business, do not disclose any nonpublic proprietary information, documents, trade secrets or other matters concerning the company. All requests from news media for the company's position should be referred to corporate communications.

Unless expressly allowed by the chair, CEO, president or chief legal officer, do not reveal to any person or entity outside of the company any information concerning the company's inventions, processes, methods, business plans, financial performance, financial projections, trade secrets, merger or acquisition plans, customer lists, computer software or information stored in communication systems, personal information that we collect from or maintain about customers or vendors, and personal information about employees learned through an essential function of your position.

Except as restricted by law, including cooperation with or reporting legal violations to the U.S. Securities and Exchange Commission and/or its Office of the Whistleblower as well as certain other governmental authorities and self-regulatory organizations, all employees and former employees must keep all confidential information with respect to the company and its affairs strictly confidential. The Code of Business Conduct does not affect an individual's ability to exercise their

constitutional, statutory or other protected rights, including employee's rights under applicable labor law to engage in concerted activity. Care must be taken to avoid inadvertent disclosure of confidential company information in the context of casual questions from relatives and social acquaintances. Your obligation to preserve confidential information continues even after your employment at the company ends. Employees who leave the company for a competitor may not use confidential information they learned at the company.



## USE GOOD JUDGMENT

The basic rules in the code are not an all-inclusive list. You are expected to use good judgment and common sense and to comply with rules of conduct that are commonly accepted in a working environment. These rules also apply to employees covered by a collective bargaining agreement, except where a rule is in direct conflict with the express written terms of an applicable collective bargaining agreement.

Electronic information is easily compromised. For this reason, all employees are responsible for protecting the privacy of co-workers and company information. The security of all the company's internal informational documents, including written or electronic records and trade secrets, is your responsibility. Take appropriate steps to ensure that information and informational systems are properly protected from unauthorized breach or disclosure. Do not attempt to access information that you are not authorized to access by circumventing any electronic device or access control. You must comply with all applicable privacy and data protection laws, regulations and treaties.

Employees and contractors are not permitted to participate in foreign government talent recruitment programs. Such programs involve a foreign entity that compensates an individual affiliated with a U.S. business

in exchange for the agreement to transfer knowledge, expertise or other intellectual assets to the foreign entity. Employees and contractors must have the company's written approval and appropriate agreements in place before such an exchange can occur. Compensation includes cash, research funding provided directly to the individual, access to research facilities or other in-kind support, honorific titles, promised future compensation or other types of remuneration/consideration.

## DISCIPLINARY ACTION FOR VIOLATION OF RULES

**YOU MUST ABIDE BY RULES AND PRACTICES ESTABLISHED BY THE BUSINESS IN WHICH YOU WORK.**

Rule infractions will be dealt with according to the seriousness of the offense and the particular facts of each case. You are expected to follow this code except where specifically instructed by business policies established to comply with laws outside the domestic U.S. Employees who violate rules contained in this code or those policies established by the department or area where they work will be subject to disciplinary action up to and including termination and possible liability. Some acts of misconduct, even if committed for the first time, are so serious that standing alone they may justify immediate termination. Some examples of these offenses are:

- Theft
- Abuse of alcohol or drugs
- Insubordination
- Dishonesty
- Fighting
- Falsification of records
- Sexual harassment
- Failure to cooperate or providing false information in a company investigation
- Intentional destruction or abuse of property
- Threatening, intimidating or interfering with other employees
- Creating a hostile working environment
- Unauthorized use of company equipment, computers or communication systems

## GENERAL RULES

### ABUSE OF PROPERTY

Defacing, mutilating, misusing or otherwise abusing company equipment or property or the property of customers or other employees during the course of your work assignment is prohibited.

### ABUSIVE LANGUAGE

You are required to refrain from the use of abusive language on company premises or in any area where company operations are conducted.

### ADDRESS AND TELEPHONE

It is required that you keep your manager and human resources advised of your current residence address and contact number.

### ALCOHOL AND DRUGS

You are strictly prohibited from using, possessing, transferring, selling, purchasing or being under the influence of alcohol or any illegal drug at any time while working or on company property. Any violation of alcohol or drug rules may be grounds for immediate termination. When the company has reason to believe you may have used alcohol or drugs in violation of these rules, you may be required to submit to testing for the presence of alcohol or drugs at a time and place designated by the company. In accordance with applicable law, you may be subject to random alcohol and drug testing. When the company has reason to believe you are in possession of alcohol or drugs in violation of these rules, you may be directed to submit to a search of your person and property.

### ATTENDANCE

- **REGULAR ATTENDANCE.** In order to respond to our needs of service, you are needed on the job, on time, every scheduled workday. Accordingly, your regular and timely attendance at work is required as a condition of continued employment. You are expected to maintain an attendance record satisfactory to the company. You are required to notify your manager as soon as you realize that you will be unable to report to work, and you must at that time give the reason for your absence.
- **SICK LEAVE AND OCCUPATIONAL INJURY LEAVE.** Prior to returning to work after an illness, injury or medical procedure, you may be required to furnish a certificate from a medical doctor regarding your fitness for duty.
- **FAMILY MEDICAL LEAVE.** Depending upon the circumstances, you may be eligible for family and medical leave. The company has a strong commitment to comply with all laws that provide for employee needs. In order to determine eligibility, contact your manager or family medical leave administrator.



### DRESS CODE

Personal grooming and attire must be neat, in good taste and in conformity with applicable business and work area standards. Because of the diverse business operations ranging from office environments to power plant operations and construction sites, business and department leaders have the discretion to determine the appropriate dress code within their areas. Appearance is a direct reflection on the company; therefore, there are times when what is considered fashionable will not be considered appropriate or acceptable. The primary objective must be to project a professional image while recognizing the practical implications of the work being done.

## COOPERATION WITH THE COMPANY

It is a basic requirement of your job that you cooperate fully with the company in any investigation concerning your conduct or the conduct of other employees. Your cooperation includes the requirement that you are truthful and do not conceal information or provide misleading information.

## COST CONTAINMENT

You are required to respect the financial, equipment and personnel resources of the company and make decisions that use them prudently.

## EQUIPMENT AND TOOLS

Unauthorized use or operation of tools, equipment or vehicles is strictly prohibited. You are not permitted to use or operate any tool, piece of equipment or vehicle unless you are qualified to do so. Lending company equipment or tools is not permitted without the express approval of management.

## FITNESS

You must be physically and mentally fit, with or without a reasonable accommodation, for the safe performance of the work you are assigned. Continued employment may be dependent upon the maintenance of this qualification. You must cooperate fully in efforts by the company to determine your fitness.

## GAMES AND GAMBLING

You are not permitted to play cards or other games on company property during work time without the express approval of your manager. Where federal and state law allow, the company may allow exceptions to this policy for company-sponsored events supporting a charitable or fundraising cause.

## HONESTY

It is a basic requirement of your job that you be honest and truthful in all aspects of your employee-employer relationship to the company. Dishonesty of any kind in relation to the company is strictly prohibited.

## INJURY

You must report all injuries sustained on the job as soon as possible to your manager regardless of the nature, cause or seriousness of the injury.

## INSUBORDINATION

You are required to comply with the lawful directions and orders of management at all times. Being insubordinate, threatening, intimidating, disrespectful or assaulting any employee, customer or vendor is prohibited.

## POSTING AND DISTRIBUTING MATERIALS

Employees may not distribute circulars or other printed materials during work time or in work areas. Except as permitted by an express provision of an applicable collective bargaining agreement or as required by applicable labor law, the wearing, distributing, posting or affixing to company property notices, petitions, literature, buttons, patches, insignia, stickers or other informational material without the express permission of management is prohibited.

## RECORDS

Any falsification of claims for pay, earnings records, expense accounts or other pay records is considered an act of theft and is strictly prohibited. You shall not knowingly submit inaccurate or false information on any company record, report, electronic record or document.

## RULES CONCERNING ATTENTION TO WORK

- **WORK PERFORMANCE.** You are expected to perform your assigned work in a safe, conscientious and efficient manner to the best of your ability and to the satisfaction of your manager and other supervisors. Delaying, interfering or hindering work production is prohibited. Conducting personal business on company time is not permitted.
- **WORK ASSIGNMENTS.** Unauthorized absence from your work location during your work shift is prohibited. You must avoid spending undue time in lavatories, halls or places furnished for your convenience. Such loitering is prohibited even if you have no specific assigned duty at the time.
- **WORK SCHEDULE.** Berkshire Hathaway Energy expects its employees to work during their normally scheduled shift. In order to meet the needs of our customers, there may be alternative work hours approved by the business president. Leaving work prior to the end of your scheduled shift is prohibited unless you have the express permission of management.
- **SLEEPING ON THE JOB.** Sleeping on the job or giving the appearance of sleeping on the job is prohibited.
- **DISTURBING OTHERS.** You are expected to pay strict attention to your own job assignment and to refrain from disturbing other employees in the performance of their work. Horseplay of any kind, whether or not it results in personal injury or property damage, is prohibited. Harassing, threatening, intimidating, assaulting, fighting or provoking a fight or similar interference with other employees at any time, on or off duty, is prohibited. You shall not spread false or malicious rumors concerning the company or any of its employees.
- **SOLICITATION.** No person shall solicit for external causes on company premises or on company time, except as authorized by management or as required by applicable law. Be sure to check the policies at your respective business to determine if there is any additional guidance on this topic.
- **THEFT.** You must protect the company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the company's finances. Any suspected incident of fraud or theft should be immediately reported for investigation. The theft, attempted theft or unauthorized possession of any property belonging to the company, another employee or any other person or firm doing business with the company, whether such property is of value or not, is prohibited. You are expected and required to cooperate fully with the company in any inspections or searches undertaken to determine compliance with this rule.

## USE OF COMPANY COMPUTERS AND COMMUNICATION SYSTEMS

You are subject to rules regarding the use of company information technology that is issued in accordance with law by the business in which you work. You must be familiar with restrictions for use of information technology that include, subject to relevant law, the following:

- **PROHIBITED ACTIVITIES.** Sending, receiving, displaying, printing or otherwise disseminating material that is fraudulent, harassing, illegal, sexually revealing, explicit or obscene is prohibited. Users encountering such material should immediately report it to their manager or human resources representative.



- **PROHIBITED USES.** Users may not use the company's intranet, internal communications tools (i.e., Viva Engage) and e-mail resources for commercial or personal advertisements, solicitations, promotions, destructive programs (i.e., viruses or self-replicating software), political material, gambling or any other use that is or may be adverse to the best interests of the company. Users should exercise the same care in drafting e-mail as they would for any other written communication. Anything created on the computer or internet may be reviewed by others. Viewing or storing inappropriate sexual images or visiting websites containing sexual images is strictly prohibited.
- **VIRUS DETECTION.** All material downloaded from the internet or from computers or networks that do not belong to the company must be approved by information technology prior to downloading on a company computer. Such material must be scanned for viruses and other destructive programs before being placed onto the company's computer system. All computers connected to the internet will be supplied with automatic virus checking software; however, it is the user's responsibility to ensure that all downloaded material is scanned by antivirus software.
- **DISCLAIMER OF LIABILITY.** The company will not be responsible for any damages, directly or indirectly, arising out of the use of its intranet and e-mail resources.
- **COMPUTER POLICIES, PRIVACY AND MONITORING.** You are expected to be familiar and comply with applicable computer use policies and laws covering the use of the company's computer equipment, including guidance on the Data Protection Act of 1998 that applies to employees in the U.K. and various federal and provincial personal privacy protection legislation that applies to employees in Canada. Ask your manager for a copy of the policy that applies to you. Subject to these policies and the law, the company has the right to monitor any and all aspects of its computer systems including, but not limited to, monitoring any sites users visit on the internet, reviewing material downloaded or uploaded by users and reviewing e-mail sent and received by users. Employees waive any right to privacy in anything they create, store, send or receive on the computer or the internet while using company computer equipment. While the use of a personal device for business purposes is discouraged, if an employee uses a personal device for business purposes, the company also reserves the right to monitor and access any and all business communication on the personal device, including access to e-mail and text messages.
- **COMPLIANCE WITH APPLICABLE LAWS AND LICENSES.** Users must comply with all software licenses, copyrights and all laws governing intellectual property and online activity.

## MONITORING COMPUTER USAGE

All information stored on or created using company equipment shall be the sole property of the company. Except where provided by law and any local practices, individuals should not have an expectation of privacy, and all employee activity on company computers may be monitored by the company. Various policies are published by the businesses to advise employees about what activity is appropriate. All employees must be familiar and comply with applicable computer use policies and laws covering the company's computer equipment, including guidance on the Data Protection Act of 1998 that applies to employees in the U.K. and various federal and provincial personal privacy protection legislation that applies to employees in Canada. Ask your manager for a copy of the policy that applies to you. For your protection, sharing user accounts or passwords is strictly prohibited.

## USE OF COMPANY NAME AND ENDORSEMENTS

Except when acting on behalf of and in your authorized capacity with the company, you may not use the company name in any correspondence, transaction, lease, purchase agreement, bill of sale, contractual document or other document as a representative of the company without the advance approval of management. Communications with the media on behalf of the company must be approved in advance with the corporate communications department or legal department.

You must not endorse, promote or give testimony for products, services or equipment the company uses, either personally or on behalf of the company. Any requests for such endorsements should be forwarded to the legal department to determine whether approval would be in the company's best interests. Any approvals for endorsements must be obtained from the company's legal department prior to the endorsement and must be in writing.



### USE OF EMPLOYEE PHOTOS

The company will sometimes use employee photos taken at volunteer events, conferences, etc. for business purposes, including on the company website, social medial profiles, marketing materials and employee training materials. The company will ensure employees are treated with dignity when their image is used and will refrain from altering photos in a way that could misrepresent them or damage their reputation. Employees acknowledge this practice and agree that the company can use their images for this purpose.

# ENVIRONMENTAL RESPECT



## THE COMPANY TAKES PRIDE IN ITS COMMITMENT TO COMPLIANCE WITH APPLICABLE ENVIRONMENTAL STANDARDS.

The company believes responsible environmental management is good business. It benefits our customers and improves the quality of the environment in which we live. This policy establishes the environmental RESPECT principles that guide our corporate commitment to the environment.

### RESPONSIBILITY

All levels of management are responsible for integrating environmental management programs into business processes in order to measure and improve environmental performance. All employees are responsible and accountable for understanding and incorporating environmental compliance requirements into their daily work activities with the obligation to bring issues and concerns forward for resolution.

### EFFICIENCY

We will responsibly use natural resources and pursue increased efficiencies that reduce waste and emissions at their source. We will develop sustainable operations and implement environmental projects designed to leave a clean, healthy environment for our children and future generations.

### STEWARDSHIP

We will respect our natural resources and take care in balancing the needs of customers with our obligation to future generations. We will seek opportunities to preserve, restore, protect and improve our natural surroundings.

### PERFORMANCE

We will set challenging goals and assess our ability to continually improve our environmental performance. Through the strategic management of our assets, we will improve the environment and contribute to our businesses' success.

### EVALUATION

We will perform audits to evaluate our environmental compliance and use the results to improve our operations and their impact on the environment.

### COMMUNICATION

We will foster open dialogue and informed decision-making through communication of environmental information with management, employees and the public. We will work with governments and others in creating responsible environmental laws and regulations reflective of sound public policy.

### TRAINING

We will provide the training necessary for our employees to perform their environmental responsibilities. We will encourage and provide opportunities for employees to learn more about the environment and foster an atmosphere of creating cost-effective solutions that go beyond compliance.

# CONCLUSION/REPORTING VIOLATIONS

While the code sets forth the minimum standards of acceptable behavior, it is not intended to cover every issue that may arise. Your good judgment must always be your guide. The code is not solely about what company employees may and may not do. The code is about providing you with resources to support you in doing the right thing. If you ever need help deciding how to handle a particular situation at work, need to report a situation or need support in doing the right thing, the first person you should turn to is your manager. If you do not feel comfortable doing that, contact your human resources representative or any of the other contacts listed in the back of this code. Remember, a good guideline is to act at all times in a manner that you would be proud to explain to your family and friends.

We must all work together to ensure prompt and consistent action against violation of this code. In some situations, however, it is difficult to know if a violation has occurred. Because we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts
- Ask yourself:
  - What specifically am I being asked to do? Does it seem legal, ethical, dishonest or improper?
  - Is it the right thing to do?
  - Will it reflect well on me and the company?
  - Would I feel comfortable if it was reported in the news or to someone I respect?
  - Will it protect the company's reputation?
- Clarify your responsibility and role
- Discuss the problem with your manager
- Seek help from company resources

All cases of questionable activity involving the code or other potentially improper actions will be reviewed for appropriate action, discipline or corrective steps. Whenever possible, the company will keep confidential the identity of employees about or against whom violations are brought, unless or until it has been determined that a violation has occurred. Retaliation against any employee who has, in good faith, reported a violation or suspected violation is strictly prohibited. Good faith does not mean that a reported concern must be correct, but it does require you to be truthful and not intending to deliberately mislead when reporting a concern or potential violation.

## THE ETHICS AND COMPLIANCE HOTLINE

IF YOU ARE AWARE OF ANY VIOLATIONS OF THIS CODE, OUR POLICIES OR THE LAW, YOU MUST REPORT THEM. If you want to remain anonymous, you can call any of the listed contacts provided on the next page or submit your report through [www.brk-hotline.com](http://www.brk-hotline.com). You can also submit a report by calling the hotline at the number provided below. Issues related to job performance, harassment, discrimination and employee disputes should first be reported to your manager, human resources representative or legal department.

**1-800-261-8651** (for calls within the U.S. and Canada)

**0800-031-8202** (for calls within the U.K.)

**TOLL FREE • 24/7**

## REPORTING VIOLATIONS OF THE CODE AND OTHER HELPFUL RESOURCES

You should always feel free to discuss questions regarding the code with your manager or human resources representative. However, the following additional resources exist within the company to assist you:

### **Mark Hewett**

President and CEO  
Berkshire Hathaway Energy  
P.O. Box 657  
Des Moines, IA 50306 USA  
(402) 398-7680

### **Natalie Hocken**

Senior Vice President and  
Chief Legal Officer  
Berkshire Hathaway Energy  
Lloyd Center Tower, Suite 2000  
825 NE Multnomah  
Portland, OR 97232 USA  
(503) 813-7205

### **Brian McGrath**

Senior Employment Counsel  
Berkshire Hathaway Energy  
1111 S. 103rd Street  
Omaha, NE 68124 USA  
(402) 398-7449

### **Doug Kusyk**

General Counsel  
BHE U.S. Transmission  
Lloyd Center Tower, Suite 2000  
825 NE Multnomah  
Portland, OR 97232 USA  
(503) 813-6270

### **Mark Warden**

Senior Vice President and  
General Counsel  
BHE Renewables  
P.O. Box 657  
Des Moines, IA 50306 USA  
(515) 697-3267

### **Dana Strandmo**

Senior Vice President and  
Chief Legal Officer  
HomeServices of America, Inc.  
7500 Flying Cloud Drive  
Suite 300  
Eden Prairie, MN 55344 USA  
(612) 336-5476

### **Tom France**

General Counsel  
Northern Powergrid  
Lloyds Court  
78 Grey Street  
Newcastle upon Tyne  
United Kingdom NE1 6AF  
0191-223-5159

### **Mark Lowe**

Senior Vice President and  
General Counsel  
MidAmerican Energy Company  
P.O. Box 657  
Des Moines, IA 50306 USA  
(515) 242-4042

### **Kirk Lavengood**

Vice President, General Counsel  
and Regulatory Affairs  
Northern Natural Gas Company  
Kern River Gas  
Transmission Company  
1111 S. 103rd Street  
Omaha, NE 68124 USA  
(402) 398-7376

### **Karen Kruse**

Senior Vice President and  
Chief Legal Officer  
PacifiCorp  
Lloyd Center Tower, Suite 2000  
825 NE Multnomah  
Portland, OR 97232 USA  
(503) 813-5863

### **Ryan Bellows**

Vice President and General Counsel  
NV Energy  
6226 W. Sahara Avenue  
Las Vegas, NV 89146 USA  
(702) 402-5791

### **Martha Peden**

Senior Vice President, Law,  
Regulation and General Counsel  
Altalink  
2611 3rd Avenue SE  
Calgary, Alberta T2A 7W7  
(403) 861-0271

### **Dennis Lane**

Deputy General Counsel  
BHE GT&S, LLC  
10700 Energy Way  
Glen Allen, VA 23060 USA  
(804) 921-0737

### **Jeffery Erb**

Vice President, Chief Corporate  
Counsel and Corporate Secretary  
Berkshire Hathaway Energy  
BHE Transmission  
Lloyd Center Tower, Suite 2000  
825 NE Multnomah  
Portland, OR 97232 USA  
(503) 813-5372

### **Nancy Murray**

President  
BHE Montana, LLC  
4750 East Park Drive, Third Floor  
Palm Beach Gardens, FL 33410 USA  
(415) 972-9380





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