

# **Purpose & Commitment**

Hampton Tedder Electric (HTE) is committed to maintaining the highest standards of ethical conduct, integrity, and transparency in all our operations, ensuring accountability to our stakeholders, customers, employees, and regulators. Our ethics policy is designed to foster a culture where ethical behavior is at the core of every decision, and where we comply with all applicable laws, regulations, and industry standards.

# **Ethical Standards**

- **Integrity and Transparency**: We are committed to acting with honesty, transparency, and fairness in all our business dealings.
- **Compliance with Laws & Regulations**: We adhere to all relevant federal, state, and local laws, including those specific to public utilities, environmental regulations, labor laws, and financial reporting requirements. This includes compliance with:
  - California Public Utilities Code and California Public Utilities Commission (CPUC) standards.
  - California Consumer Privacy Act (CCPA) and other privacy regulations
- Anti-Corruption & Anti-Bribery: HTE enforces a zero-tolerance policy against bribery and corruption, in line with U.S. Foreign Corrupt Practices Act (FCPA) and other antibribery laws.
- Fair Competition & Anti-Trust: We are committed to competing fairly and complying with all anti-trust and competition laws.

### Accountability and Reporting

- Leadership Responsibility: Senior leadership is responsible for cultivating a culture of ethics and ensuring that the ethics policy is communicated to all employees, contractors, and other stakeholders.
- **Employee Responsibility**: Every employee, contractor, and board member have an obligation to comply with the company's ethics policy and report violations without fear of retaliation.
- **Third-Party Compliance**: HTE expects suppliers, contractors, and business partners to adhere to ethical standards and applicable laws, including anti-corruption and environmental responsibility.







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# **Risk Management**

- **Environmental Sustainability**: In line with California's strict environmental regulations and California Air Resources Board (CARB) standards, HTE is committed to environmental sustainability and responsible resource management.
- Cybersecurity & Data Protection: In response to growing cybersecurity threats, HTE has implemented robust security measures in compliance with the California Consumer Privacy Act (CCPA), California Privacy Rights Act (CPRA), and California Data Breach Notification Law.

### **Training and Communication**

- **Ongoing Training**: We provide mandatory ethics training to all employees annually, including training on compliance with public utility laws, environmental sustainability, anti-corruption, and whistleblower protections.
- Ethics Helpline: A confidential and anonymous ethics helpline is available 24/7 through our website for employees and third parties to report concerns or seek guidance on ethical issues.