

# FortisAlberta Code of Conduct



Delivering a Cleaner Energy Future

About the Code

Compliance With Laws and Ethical Decision Making

Being Your Best

Health and Safety

Environment and Sustainability

Values and Culture

Acting Responsibly

Prudent and Ethical Use of Our Assets

Where To Go For Help

Other FortisAlberta Policies and Procedures



# Table of Contents

**Message from the President and CEO** ..... 3

**Delivering a Cleaner Energy Future** ..... 4

    Mission, Purpose and Values ..... 4

**About the Code**..... 5

    Following the Code..... 5

        Waiving An Aspect of the Code ..... 5

    Reporting a Concern ..... 6

        No Retaliation..... 6

**Compliance With Laws and Ethical Decision Making** ..... 7

    Compliance With Legal Requirements ..... 7

    Ethical Decision-Making Guide..... 7

**Being Your Best**..... 8

**Health and Safety** ..... 9

    Fit for Duty..... 9

    Use of Vehicles for Business Purposes ..... 10

        Distracted Driving..... 10

**Environment and Sustainability** ..... 11

    Our Communities..... 11

    Partnerships with Indigenous Peoples..... 11

    Our Environment..... 12

    Business Excellence ..... 12

**Values and Culture** ..... 13

    A Fortis for Everyone..... 14

**Acting Responsibly**..... 15

    No Corrupt Practices ..... 15

    Gifts and Entertainment ..... 16

    Political Engagement..... 17

    Lobbying ..... 18

Avoiding Conflicts of Interest..... 18

    Red Flags..... 18

    Outside Employment and Volunteering ..... 19

        Donations ..... 19

        Serving On Outside Boards ..... 19

**Prudent and Ethical Use of Our Assets**..... 20

    Use of Corporate Credit Cards ..... 20

    Business Travel..... 20

    Artificial Intelligence ..... 21

    Use of Communication Devices ..... 22

    Information Use ..... 22

        Proprietary and Confidential Information ..... 22

        About Confidential Information ..... 23

        Protecting Confidentiality ..... 23

        Material Information and Securities Trading ..... 24

        Authorized Spokespersons ..... 25

        Social Media ..... 25

        Privacy ..... 26

        Keeping Accurate Financial Records ..... 27

        Records Management..... 27

**Where To Go For Help** ..... 28

    Filing a Report Personally ..... 28

    Filing a Report Anonymously ..... 28

    What Happens Next ..... 28

**Other FortisAlberta Policies and Procedures**..... 29



## Message from the President and CEO

Our customers rely on us to be there for them at all times. As the line that connects us all, we consider it a privilege to deliver electricity to Albertans. With company roots going back more than 100 years, we have earned FortisAlberta customers’ trust by always demonstrating our purpose and values and maintaining an unwavering focus on safe, reliable and dedicated customer service. We also have an exciting future as part of the clean energy transition.

We’re part of a bigger team. Our parent company, Fortis Inc., is based in Newfoundland and is comprised of 9 utility operations located across Canada, the United States and the Caribbean. While geographically and operationally separated, we share many of the same values and guiding principles as our parent and sister companies.

We always strive to do the right thing, comply with all legal requirements and act with honesty, integrity and professionalism in everything we do. Whether we’re interacting with work colleagues, industry partners, advisors, the regulator or customers, how we conduct ourselves leaves an impression of who we are as a Company. We must remain vigilant in protecting our good name and reputation.

We are dedicated to respecting the principles of social justice and treating all people fairly and with respect – we foster a work environment where everyone feels valued for their contributions and the unique perspectives they offer. We are stronger together because of our differences.

Our Code of Conduct is our primary reference guide for ethical and professional behaviour at FortisAlberta. We must follow the Code and live by its standards. While the Code is robust, what really matters is doing the right thing, and living by the principles expressed in our Code each and every day.

I encourage you to be mindful of what you observe in your workplace and to speak up if you see anything that causes you to be uneasy, uncomfortable or concerned.

Every year you must acknowledge that you have read, understood and agree to abide by the Code. I thank everyone for your continuing commitment to the Company and the communities we service, and to high ethical standards in everything we do.

Janine Sullivan  
President & CEO

# Delivering a Cleaner Energy Future

## Mission, Purpose and Values

Our mission is to deliver safe, reliable electricity in a cost-effective manner to our customers, create value for our shareholder and be a great employer and corporate citizen.

Our purpose is to deliver the electricity that empowers Albertans to succeed. We keep the power on, not just because it's our job, but because we care about the people we serve. We are reliable, honest, and dedicated to our work because our employees, customers, and communities matter to us.

Our values of safety, integrity, respect, excellence, and service form the compass that keeps employees pointed in the desired direction.

### Safety

We perform our work safely, so we all return home at the end of each day.

### Integrity

We are honest and ethical in the work that we do.

### Respect

We embrace diverse perspectives, ideas and identities.

### Excellence

We strive to improve in everything we do, holding ourselves accountable to each other and our customers.

### Service

We work collaboratively to be responsive to our customers and our communities.



## About the Code

### In This Document

- “Code” means this Code of Conduct;
- “We”, “us”, “our” “FortisAlberta” and “the Company” means FortisAlberta Inc.;
- “You” and “your” mean everyone who is governed by the Code; FortisAlberta’s employees, officers, Board directors, contractors, and representatives;
- “Board” means our Board of Directors; and
- “Officer” means an executive officer as defined in Canadian securities laws, with the exception of the Compliance and Privacy Officer for the purposes of this Code; and includes the Chair of the Board, Chief Executive Officer (CEO) and President, Chief Financial Officer (CFO) and Vice Presidents in charge of principal business divisions or functions.

Integrity and sound policies and procedures are core to the way we do things and are critical to our success. The Code sets out the high standard of conduct we expect of everyone at FortisAlberta. The principles in this Code apply across the entire Company at all times. We have zero tolerance for unethical conduct or breaches of integrity. Always doing the right thing and conducting ourselves with integrity is key.

The Code is reviewed biennially by the Governance and Human Resources Committee and approved by the Board. You can find an electronic copy on our intranet (the Wire) and our website at [fortisalberta.com](http://fortisalberta.com).

### Following the Code

The Code applies to FortisAlberta employees, Officers and Board directors and, whenever feasible, contractors and consultants. When provisions in this Code are also addressed in the collective agreement, unionized employees must follow the latter. We also expect our FortisAlberta suppliers to follow the standards and guidelines contained in the [FortisAlberta Supplier Code of Conduct](#).

Following the Code and all other FortisAlberta’s policies, procedures and guidelines is mandatory. Non-compliance may result in disciplinary action, up to and including loss of employment or termination of contract.



### Waiving an Aspect of the Code

The Board may waive an aspect of the Code in certain circumstances. A request must be made in writing to the Compliance and Privacy Officer or Vice President, Regulatory and Strategic Affairs, General Counsel who will review the request and make a recommendation to the Board. We will publicly disclose a waiver granted by the Board as required by the applicable legal requirements.

## Reporting a Concern

### Reporting Channels:

- Your Leader;
- Compliance and Privacy Officer;
- Human Resources Business Partner;
- Director People and Culture;
- Director Internal Audit, Risk and Sustainability Governance;
- Chair of the Audit, Risk and Environment Committee;
- Any Vice President of FortisAlberta; or
- Anonymously via EthicsPoint at 1-866-294-5534 (toll free) or [ethicspoint.com](https://ethicspoint.com)

You have a duty and an obligation to promptly report any real, potential or suspected unethical conduct, misrepresentation and/or violation of a legal requirement or FortisAlberta policy, including this Code, procedure, internal control, or standard. Where other FortisAlberta's policies or procedures contain a specific reporting process, such as the Respect in the Workplace Policy, those processes should be followed first. To report any real, potential or suspected incident, you may seek direction from any of the reporting channels listed above.

Suspected fraud or securities law violations should be reported directly to the Director Internal Audit, Risk and Sustainability Governance or anonymously via EthicsPoint.

**For more direction, review the Reporting Allegations of Suspected Improper Conduct and Wrongdoing (Speak Up) Policy.**

### No Retaliation

Any incident of actual, potential or suspected non-compliance with the Code or other FortisAlberta's corporate policies, applicable laws, or the Company's accounting, financial reporting, internal accounting controls or auditing policies and procedures or related matters must be reported in good faith. In other words, you must have reasonable grounds for believing that the information you possess indicates a suspected non-compliance.

We investigate every report we receive and keep all information confidential. There will be no retaliation against anyone for reporting a concern in good faith. This means that the Company will not terminate, demote, transfer or otherwise discriminate against anyone for reporting an incident or giving information in relation to an investigation. The Company does, however, reserve the right to discipline anyone who knowingly makes a false accusation, provides false information, or acts improperly.

**Q:**

I am a new employee and still learning some of the complexities of my job. I don't yet entirely understand everything that my department does, but there are aspects that I just can't follow, and I am starting to wonder if it's all aligned with the policies, rules and expectations of FortisAlberta. What should I do?

**A:**

If you find yourself in a situation where you have concerns about a work-related matter, you must speak up. While it's often human nature to be reluctant to say anything, you should never ignore things that make you uncomfortable. At first instance, you should bring any such concerns to your Leader, who has broad and detailed knowledge about your department's work and can answer any questions you may have. However, if you would feel uncomfortable doing that, you can also speak to a member of senior management, a Human Resources Business Partner, the Compliance and Privacy Officer or any other reporting channel. All employees should feel free to speak up about any concerns. There will be no retaliation or repercussions for reporting a concern in good faith.

# Compliance With Laws and Ethical Decision Making

## Compliance With Legal Requirements

You are required to conduct the business of FortisAlberta in accordance with all applicable legal requirements and the terms and spirit of this Code.

### Competition Laws

You must comply with all applicable competition laws to ensure fairness, transparency and fair play in our commercial activities. Behaviour such as agreements with competitors to allocate markets or customers, agreements to control or manipulate prices or rates, the boycotting of certain suppliers or customers or exclusive dealing, bid-rigging, misleading advertising, and the abuse of dominant market position is prohibited. If you're not sure if there's a potential issue with competition law related to a specific business activity, speak to FortisAlberta Legal Counsel or the Compliance and Privacy Officer.

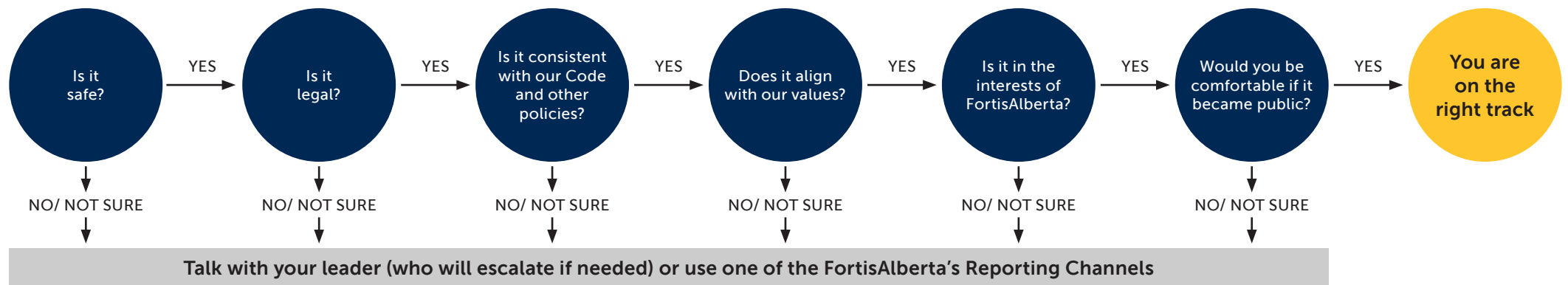
All relationships with customers, current and potential business partners, suppliers, public office holders, the general public and other stakeholders must be honest, fair, courteous, respectful and conducted with integrity and due regard for the protection of the interests involved. You are not permitted to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. You must never assist anyone to circumvent the law, evade taxes or commit fraud.

Most aspects of our business are regulated. The Alberta Utilities Commission performs a vital role in safeguarding the public interest, and we all have a role to play in meeting our commitments and demonstrating to the regulator that FortisAlberta is a responsible owner of public utility assets. As a regulated utility,

we interact with the regulator and maintain a respectful, constructive and cooperative relationship that builds trust and is good for all of our stakeholders. It is simply the right way to conduct business.

### Ethical Decision-Making Guide

The Code communicates expectations and provides principles of behaviours to help you make the right decisions and take the right actions so that we are able to conduct our business safely, legally, ethically, sustainably and in alignment with our values. However, the Code cannot address every situation you may encounter in the workplace and it is not always clear what is the right decision or behaviour. For guidance in these situations, we recommend that you use the ethical decision-making process diagram.



# Being Your Best

## Setting the Right Tone

Leaders at every level have a responsibility to set the right tone, maintain our culture of integrity and always model ethical behaviour. If you're a Leader, four basic principles must always guide your decisions and actions regardless of your specific role:

### Engage

Create an open and welcoming environment for employees to speak up.

### Identify

Understand what misconduct may look like and watch out for it.

### Escalate

Connect quickly with the right resource if there is a concern or report of potential misconduct.

### Ensure

Watch for any signs of retaliation against an employee who has voiced a good faith concern.

## Being Your Best means exhibiting your best qualities as you perform your daily responsibilities and interact with others.

At FortisAlberta, we expect you to treat others as they would like to be treated. Maintaining a high standard of conduct creates a strong, positive culture that benefits everyone. We have zero tolerance for bullying, harassment, discrimination, violence, or any form of derogatory treatment of others. As you go about your daily activities at work and in communities we serve, you're expected to:

- follow the rules and do the right thing;
- act with honesty and integrity;
- look out for the safety and wellbeing of others;
- speak up if you see something that doesn't seem right, or otherwise concerns you or makes you feel uncomfortable;
- show respect to everyone that you deal with and treat others in a cooperative and inclusive manner;
- avoid conflicts of interest or other situations that could compromise your loyalty, objectivity and judgment;
- protect the reputation, assets and interests of FortisAlberta;
- minimize impacts on the environment and support sustainability in our operations; and
- support the communities where we live and operate.



# Health and Safety

## Home Safely

FortisAlberta’s primary goal is to ensure that every single day, you return home safely. Focusing on ensuring that we get ourselves, our co-workers, our customers and the general public home safely each day supports a strong safety culture more than any numbers can.

*Home Safely*

There is a risk of injury and harm in every workplace. The utility business is somewhat unique because the product we deliver to our customers – electricity – is inherently dangerous if it’s not handled properly. FortisAlberta recognizes that a strong Health and Safety Management System is vital to protecting the personal well-being of employees, contractors and the public, and that sound health and safety practices make good business sense. The Company strives to achieve health and safety excellence while providing safe and reliable service to our customers. No work requirement is more important than ensuring the job is performed safely. Shortcuts for expediency, at the expense of health and safety, are unacceptable. We all share the responsibility to ensure our workplace and the communities we serve are safe and healthy. Therefore, you are expected to work safely and to protect the health and safety of everyone by following FortisAlberta’s rules, policies, standards, manuals and procedures, including our Health and Safety Management System (HSMS) that is designed to continually improve our occupational health and safety performance.

All safety issues should be reported to your Leader or health and safety representative. There will be no retaliation against anyone for reporting a safety concern in good faith.

**For more direction, review the Health and Safety Commitment Statement.**

## Fit for Duty

Our Employee Handbook and the FortisAlberta Drug and Alcohol Policy sets out our expectations for people at work and attending corporate functions. It includes the general expectation that personnel will come to work “fit for duty” – being reasonably capable of safely performing the requirements of their job. The policy also confirms our duty as an employer to reasonably accommodate people who have legitimate medical conditions.

You must be fit for duty and not under the influence of alcohol or drugs when you report to work, throughout all working hours (on and off premises and on standby duty) and when operating any vehicle or equipment provided by FortisAlberta. The use of alcohol or drugs can have serious adverse effects on job performance and poses a significant threat to the safety of yourself and others. The Company may permit the use of prescription or over the counter medication as an exception in certain circumstances

**For more direction, review the Drug and Alcohol Policy and the Employee Handbook.**

## Use of Vehicles for Business Purposes

Vehicles are one of the primary tools we use to deliver our services. If you operate any motor vehicle (including a personal or rental vehicle) while on Company business you must follow all of FortisAlberta’s driving policies and standards, and applicable municipal, provincial, and federal laws and regulations, the National Safety Code (Canada), the Traffic Safety Act (Alberta) and local ordinances. Personnel operating a vehicle while on Company business must do so in a safe and reasonable manner.

**For more direction, review the Vehicle Policy and the Fleet Monitoring Policy.**

## Distracted Driving

Unless you are in an emergency or require using a mobile radio for essential business communication, you must not use any device (for example, smartphones, laptops, tablets, and smart watches) in the handheld mode while operating a motor vehicle, including when the vehicle is stopped at a red light, stop sign, railroad crossing or in a traffic jam. You are also not allowed to read, write/draw/sketch or do self-grooming when operating a motor vehicle. To remain focused on the task of driving, the Company strongly recommends that you do not use any devices (except those that have been activated before you started driving) until the motor vehicle is safely parked. We also highly recommend that you program a navigational device and audio entertainment system and turn on the “Do Not Disturb” function on all devices before you start driving.

**For more direction, review the Distracted Driving Policy.**

*Home* **Safely**



# Environment and Sustainability

We consider the impact of our actions on society, the environment and the communities where we operate. We seek to make positive contributions to our communities.

Our strategy focuses on investing in a cleaner, more resilient, energy grid. We are committed to supporting the transition to cleaner energy, taking actions to address climate change, and maintaining resilient infrastructure. As the energy transition unfolds, customer affordability and system reliability will remain key pillars of our values and long-term business strategy.

We act responsibly to protect our neighbours and the public, and to promote sustainability in everything we do.

We're committed to environmental compliance, stewardship, leadership and accountability. Whether you work in the field, or an office, you must comply with all environmental requirements and related corporate policies that apply to you. We track, investigate and report on environmental and other hazards and incidents and strive for continuous improvement.

## Our Communities

We play an active role in supporting the communities we serve. We seek to empower our customers to succeed while delivering value for our shareholder. We commit to meaningful engagement with our stakeholders to meet their current needs and be a catalyst for innovation. We believe that by working together we can achieve the most positive outcomes for diverse and inclusive communities.

## Partnerships with Indigenous People

FortisAlberta acknowledges the importance of building and nurturing authentic relationships with the 20 First Nations and two Métis Settlements whose lands and traditional territories we operate on. We honour the Truth and Reconciliation Commission of Canada's Calls to Action and commit to the following principles:

- Understanding and Awareness of Indigenous history, rights, values, languages, traditions and cultural practices.
- Foster and Nurture Constructive Relationships.
- Promote and Enhance Communications.
- Sustainable Resource Use.
- Shared Economic Prosperity.



## Partnering In Success

Projects succeed when we work collaboratively and FortisAlberta is committed to open and transparent consultation. We draw upon community-led guidance and representation to support construction and maintenance activities.

## **Our Environment**

We have a responsibility to protect the environment and preserve biodiversity for future generations. We build climate resilience throughout the organization with innovative and adaptive solutions to address climate risks. We pursue emerging solutions for customers that promote energy efficiency and reduce greenhouse gas emissions.

## **Business Excellence**

We strive to be leaders in our industry in governance and management practices, and the Company incorporates sustainability within decision-making throughout the organization. We positively influence our peers and industry partners to adopt high sustainability standards and learn from others so that we continuously improve.

**For more direction, review the Environment, Health and Safety, Indigenous and Sustainability Commitment Statements.**



# Values and Culture

## International Human Rights

We respect workers' freedom of association, right to collectively bargain, and right to a fair wage. We also support the spirit and intent of international human rights conventions such as the United Nations' Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, Freedom of Association and Protection of the Right to Organize Convention (CO87) and Right to Organize and Collectively Bargain Convention (CO98).

We work relentlessly to sustain a work environment that is free of disrespectful behaviour. We have zero tolerance for harassment, sexual harassment, bullying, discrimination, violence and any other form of abusive behaviour in the workplace. The Company will not tolerate any disrespectful behaviours or actions by employees, customers, contractors, suppliers or other individuals associated with the Company while engaged in activities for us or on our behalf.

A respectful workplace requires the cooperation and commitment of all of us. Everyone, regardless of their role or position in the Company, has a responsibility to set a positive example and behave in a manner that will not offend, embarrass or humiliate others, whether such behaviour is deliberate or unintentional.

The Company is committed to investigating and responding to complaints about disrespectful behaviour in the workplace promptly, and will work to resolve issues quickly, including taking corrective action honestly and with appropriate consideration for privacy and confidentiality.

Any acts of violence committed by or against any employee, customer, contractor, supplier or member of the public are unacceptable and will not be tolerated. We are also committed to supporting employees affected by intimate partner violence.

We have established a framework and an enterprise-wide advisory council to guide our inclusion and diversity efforts. We work to treat all employees fairly and based on merit.

Our expectation of respect for human rights applies equally to employees and our suppliers. Our Supplier Code of Conduct sets out our expectations of our suppliers.

**For more direction, review the Violence in the Workplace Policy and Prevention Plan and the Supplier Code of Conduct.**



### A Fortis for Everyone

FortisAlberta, united with other Fortis companies in our commitment to an inclusive and diverse workforce, recognizes that through similarities and differences we can generate bold ideas and strong results. Our commitment to inclusion and diversity is upheld through a focus on talent, culture, identity, and community.

**Q:**

I thought I would plan an informal social gathering for my department after work on Friday, but I'm pretty sure that our new hire can't make it because they usually pick up their child from day care at 5:30. I guess it's OK to leave them off the invitation?

**A:**

No, it's best to invite everyone to your group activities, even if some might not be able to make it. All employees are part of the FortisAlberta team and appreciate being thought of and included. Always treat others as they would like to be treated and be considerate of how others might misinterpret an innocent oversight.



### A Culture of Equality

Hiring practices should be non-discriminatory and people should be treated fairly, compensated appropriately and promoted without discrimination. We strive to treat people equally, without differentiating based on race, nationality, ethnic origin, Indigenous status, colour, religion, age, gender, marital status, family status, sexual orientation, identity or expression, political belief, source of income, disability or disfigurement in our employment practices or hiring of third-party providers.

Ultimately, our goal is to create a workplace where everyone feels respected and empowered to bring their authentic selves to work. The objectives of our Inclusion and Diversity Strategy are:

**1. Have a workforce broadly reflective of the diverse communities we serve.**

**2. Be a workplace that fosters a culture of inclusion and diversity.**

**3. Support community groups working to address diversity issues important to us and our stakeholders.**

**4. Ensure our Leaders consistently promote values and behaviours of an inclusive and diverse workplace.**

**5. Create a FortisAlberta for everyone.**

Our inclusion and diversity commitment confirms our organization-wide pledge to create a workplace where all feel welcomed, valued, respected and empowered to bring their authentic selves to work.

# Acting Responsibly

## No Corrupt Practices

Our Anti-Corruption Policy governs dealings with international and domestic public office holders, as well as individuals and entities that FortisAlberta does business with. All FortisAlberta employees receive anti-corruption training upon hire and annually thereafter. The policy contains guiding principles covering such things as:

- bribery and improper payments;
- facilitation payments;
- lobbying;
- gifts and entertainment; and
- books, records and internal controls.

Our Anti-Corruption Procedures also provide practical advice on how to be vigilant in spotting potential issues that could arise while performing your duties. Mere perception of inappropriate behaviour, even if based on a misapprehension of the facts, can compromise the Company’s reputation and the strength of our brand. Therefore, you must always be conscious of how your actions and behaviours may be perceived or construed by others and act to avoid even the appearance of engaging in any inappropriate transactions.

Anti-corruption laws prohibit the promising, offering or accepting of any bribes – anything of value that is used to gain an improper advantage or to improperly influence actions and/or outcomes. You are also not allowed to make facilitation payments, unless there is an imminent threat to health or safety of a person. Any breach of international and domestic laws can result in severe consequences.



The term facilitation payment generally refers to the making of small payments to public office holders to facilitate or speed up the completion of some routine non-discretionary action or service that one is already entitled to under the laws and regulations of that jurisdiction. This could include expediting legitimate tax refunds, customs inspections, immigration processes, or the issuance of licenses or permits. “Public office holder” is defined in the Anti-Corruption Procedures and the Political Lobbying Procedures.

**For more direction, review the Anti-Corruption Policy and the Anti-Corruption Procedures.**

### **Gifts and Entertainment**

You cannot give or receive a gift, donation or benefit of any kind when conducting business on behalf of FortisAlberta if it might be perceived that an obligation has been created or a favour or special treatment is expected. Lavish gifts and entertainment and gifts of cash and cash equivalents are strictly prohibited. You can give gifts or branded FortisAlberta items if they're reasonable and have modest value and are given infrequently and in an open and transparent way. For more direction regarding donations, gifts and entertainment, please refer to the Anti-Corruption Policy and the Anti-Corruption Procedures.

### **Gifts and Entertainment Involving Public Office Holders**

Personnel and Board members must not offer, give, authorize, or arrange any gift, entertainment, hospitality, or other benefit to a public office holder, or their staff where such item could reasonably be perceived as influencing, or intended to influence, a government decision, action, or the exercise of official duties.

Any interaction involving gifts, meals, entertainment, travel, or hospitality with public office holders must comply with applicable lobbying, ethics, and conflict of interest laws, including the Alberta Lobbyists Act, and FortisAlberta's Political Engagement Policy, Political Lobbying Procedures, Anti Corruption Policy and Anti Corruption Procedures.

As a general rule, gifts and entertainment involving public office holders are prohibited, unless they are expressly permitted by law, are modest and customary, and have received approval in accordance with Company policy.

Personnel and Board members must promptly seek guidance from the Director Stakeholder and Government Affairs or the Compliance and Privacy Officer before offering or providing any gift, entertainment, or hospitality to a public office holder, or where there is any uncertainty as to whether an interaction could constitute lobbying or create a compliance risk.

**For more direction, review the Code of Conduct Policy, the Anti-Corruption Policy, the Anti-Corruption Procedures and the Political Lobbying Procedures.**

**Q:**

A third-party service provider invited me to attend a virtual session to introduce me to their service offerings in exchange for a bundle of expensive swag. I'm not yet sure if we will engage the third party for any services. Can I accept the gift?

**A:**

Guidance on offering or accepting meals, entertainment and other forms of hospitality is provided in our Anti-Corruption Procedures. The best course of action would be to decline this gift. While accepting it would not bind FortisAlberta to any commitment, this party is offering you this substantial gift to try to obtain business from FortisAlberta. Ask yourself whether accepting the gift could be seen as compromising our impartiality in evaluating this service provider. Our good corporate reputation is supported by our unwavering commitment to integrity and ethical business conduct and could be jeopardized by even the mere perception of inappropriate behaviour. You must always be conscious of how your actions may be perceived by others, and act accordingly. When in doubt, consult the Compliance and Privacy Officer.

### **Gift and Entertainment Registry**

You must fill out the [Gift and Entertainment Form](#) for any gifts and entertainment you give or receive over the defined thresholds, and for any offering of gifts of any value to public office holders.

You are not required to complete a form for any item of value given or received through the Kudos® employee recognition program.

## Political Engagement

We support organizations that advocate on a variety of subjects, ranging from national trade associations to small community groups. While advocacy and lobbying are core activities for some of these organizations, others only have infrequent and casual involvement. Generally, the objectives of these activities are to advance the interests of our Company, the utility sector or the communities we serve. When contributing to such organizations, we try to ensure alignment with our corporate values and policies, including acting ethically, with honesty and integrity, and supporting our local communities and the clean energy transition. We annually disclose our contributions to trade and political organizations and other groups that may engage in lobbying. FortisAlberta does not knowingly support any organizations whose views are materially misaligned with our values and policies.

### Employee Political Activity

You are not allowed to campaign for or promote any political party or candidate in the workplace or try to directly or indirectly influence co-workers to support a political cause, party or candidate. You must not use your FortisAlberta’s position or property for any political activity or donation, or in any way where such an association could be reasonably inferred. If you know of any such activities, you should report it.

You may choose to be involved in political activities of your choice in a personal capacity. However, when you do so, you must make it clear – where appropriate – that you are not acting on behalf of FortisAlberta and you must not use Company time or resources for that purpose.

You must immediately notify the Compliance and Privacy Officer if you decide to run as a candidate for public office or are appointed to a federal, provincial or municipal government administrative board, commission or tribunal. Any of the above-mentioned roles that may have any decision-making authority related to any aspect of FortisAlberta’s business would not be approved. Where a political office, board, commission or tribunal is not related to the Company’s business, you must obtain prior written approval from the Compliance and Privacy Officer.

**Q:**

I dread eating my lunch in the lunchroom because one of my co-workers is always badmouthing the government and trying to get others to back her favourite political party. I used to look forward to a relaxing lunch break, but this is taking the joy out of my quiet time. Is this allowed?

**A:**

No. Our Code and Political Engagement Policy prohibit the politicization of the workplace. Employees may not engage in promoting any political party or candidate in the workplace or seek to pressure or influence co-workers to vote for any political party or candidate. If any such behaviour is observed in the workplace, you should seek further direction using any of the reporting channels listed on page six of the Code.

**Q:**

I plan to volunteer (i.e., door knock) and make a personal donation to the provincial party in the upcoming Alberta election campaign. Is that ok?

**A:**

Yes, you may be engaged in political activities personally. However, when it is possible that your political activity may be perceived as being done on behalf of FortisAlberta – such as when you happen to knock on the door of one of our contractors that knows you work for us– you must make it clear that your political activity is done in a personal capacity only.

For more direction, review the [Political Engagement Policy](#) and the [Political Lobbying Procedures](#).

## Lobbying

Lobbying is any direct or indirect communication made in an attempt to influence a government decision, program or policy. Before meeting with any public office holder, you must always consider whether the purpose of the meeting constitutes lobbying.

Only Employees authorized by FortisAlberta and registered as provincial and/or federal lobbyists may conduct lobbying activities on behalf of FortisAlberta. Authorized lobbyists must comply with all applicable legislation including the Alberta Lobbyists Act and must adhere to Company policies, including the Political Engagement Policy, Political Lobbying Procedures, Anti-Corruption Policy and Anti-Corruption Procedures.

If you have any questions on lobbying, please contact the Director Stakeholder and Government Affairs or the Compliance and Privacy Officer.

## Avoiding Conflicts of Interest

It is your responsibility to always protect our corporate interests. This means you must not engage in any activity which could give rise to, or be perceived to give rise to, a conflict between the interests of FortisAlberta and yours. This extends to situations that involve or relate to the interests of family members, friends or acquaintances. If you believe that you may currently have a conflict of interest with FortisAlberta, you must disclose it on a [Conflict of Interest Disclosure Form](#) and seek further direction from the Compliance and Privacy Officer.

## Red Flags

Conflicts of interest can take different forms. While it is not possible to describe or anticipate all situations, here are a few examples of red flag situations you must avoid. You must not:

- Put yourself in a position where a transaction with FortisAlberta could result in a benefit or interest to you beyond the normal benefits of your employment/ contractual relationship with the Company.
- Put yourself in a position or relationship with a co-worker which could (or could reasonably be perceived to) compromise your objectivity, business judgment or impartiality.
- Participate in activities or ventures that compete with FortisAlberta or that interfere or appear to interfere with your duties and responsibilities to the Company.
- Use confidential or material information about FortisAlberta that is not publicly available for your benefit or the benefit of others.
- Have a financial or other interest in any entity doing business with FortisAlberta (other than an interest of one per cent or less in a publicly traded entity or an interest held through a mutual or similar fund where investment decisions are made at arms' length by others).
- Select, manage or influence a relationship with a supplier or other business partner if they employ or are controlled by someone you have a personal relationship with.

**For more direction, review the Political Engagement Policy, Political Lobbying Procedures, Anti-Corruption Policy and the Anti-Corruption Procedures.**



### Outside Employment and Volunteering

Volunteering and supporting the communities we serve is one of our core values and we encourage everyone to give back to the community. Contributing corporate time or resources to community or charitable service must be approved by a member of senior management and coordinated through the Corporate Communications department.

Your activities outside FortisAlberta must not adversely affect your performance or objectivity at work. You can pursue outside interests, like working in a part-time or off-hours job. However, consulting with, working for, or volunteering with a person or entity that FortisAlberta has a current or potential business relationship with can give rise to a real or perceived conflict of interest and must be avoided. If you have any questions, contact the Compliance and Privacy Officer or your HR Business Partner.



### Donations

All Corporate Donation or Sponsorship transactions made with a corporate credit card must be managed through Corporate Communications or the appropriate business unit. This ensures all necessary processes, procedures, and approvals are followed in line with the Corporate Credit Card Policy, the Corporate Cardholder’s Procedure Guide, the Anti-Corruption Policy and the Anti-Corruption Procedures.

### Serving On Outside Boards

If you want to serve on a board of directors or governing body of a for-profit enterprise or government agency, you need to ensure the following before you accept the position:

- Employees: must receive approval from their Vice President.
- Executive officers: must receive approval from the Compliance and Privacy Officer and CEO.
- Board directors: must consult with the CEO and receive approval from the Chair of the Governance and Human Resources Committee.

You can serve on the board or governing body of a non-profit organization without receiving prior approval if the appointment does not create an actual or perceived conflict of interest with FortisAlberta.

## Prudent and Ethical Use of Our Assets

You have a personal responsibility to protect our tangible assets (like our equipment and facilities) and intangible assets (such as corporate opportunities, intellectual property, trade secrets and business information, including emails, memos, accounting records, invoices, contracts and other corporate assets) from misuse or theft. You must comply with all policies and procedures concerning information security (see the 'Information Use' section on page 22 of this Code). You cannot obtain, use or divert FortisAlberta's property for personal use or benefit, or use the FortisAlberta name or purchasing power for personal benefit.

### Use of Corporate Credit Cards

**Exercise Good Judgment When Using a Corporate Credit Card for Hospitality Expenses**

Hospitality expenses can include the cost of food and drink, and events hosted by third parties such as concerts, sports tournaments or other entertainment. The use of a corporate credit card for hospitality expenses must have a clear and identifiable business purpose. Such use must also adhere to the conflicts of interest provisions in this Code and the Gifts and Entertainment reporting process. Speak with your Leader to understand the limits and appropriateness of hospitality expenses.

If you are a holder of a FortisAlberta corporate credit card, you are permitted to use it only for a clear and identifiable business purpose. As per the Procurement Policy, certain goods and services above the procurement threshold require specific terms and conditions and cannot be purchased using the corporate credit card. For more details, please see the Corporate Credit Card Policy and the Procurement Policy.

When a corporate credit card is used for an expense involving other FortisAlberta personnel, such as a meal or other hospitality expenses, the most senior Leader in attendance at the time of payment must pay for the expenses using their corporate credit card.

### Business Travel

Before any business travel is planned and booked, you must first receive the approval from your Leader. Our Travel and Business Expense Policy sets out guidelines for business travel, including air travel, accommodations, ground transportation, meals and other expenses, and stipulates that business travel expenses should be paid using a corporate credit card.

If you are required to travel on Company business, you are expected to exercise good judgment and be prudent when incurring related expenses. You must also ensure that all expense claims are properly documented.

The use of a corporate credit card for personal expenses is prohibited, except when your Leader pre-approved combining business and personal expenses,

such as a hotel expense that covers business and personal time. You must reimburse FortisAlberta for the personal portion of the expenses.

**For more direction, review Corporate Credit Card Policy.**

When you require out-of-province airline, accommodation or other transportation reservations for business travel, you are required to use FortisAlberta's Corporate Travel Agent.

**For more direction, review the Travel and Business Expense Policy.**

## Artificial Intelligence

The availability and use of artificial intelligence (AI) platforms have grown rapidly. Such products can benefit our business but also bring risk. Our IT Acceptable Use of Technology Policy set out our expectations for managing the use of AI, including considerations regarding appropriate uses, protecting confidentiality and intellectual property rights, and vetting and clearly identifying content produced using AI.

The IT Acceptable Use of Technology Policy defines the permitted and prohibited uses of FortisAlberta’s Information Systems and IT Services and of the data created, transmitted or stored by such systems and services. You are not permitted to input personal information, confidential, or sensitive data into any public AI system, as per the Internal Privacy Policy. Users must verify the quality of AI-generated content, and, when required, must include relevant references to any sources listed by the AI system that produced the content.

**Q:**

When I ask Microsoft Copilot to write a Scope of Work for me for a new contract with a service provider, it does a great job and all I have to do is input is some basic information about the service being provided, payment terms and party contact information. Is this OK?

**A:**

Yes, you may use Microsoft Copilot for legitimate business purposes, provided you follow company policies. If you are using the enterprise-licensed version of Microsoft Copilot, you may use it to work with information you are authorized to access as part of your role.

AI-generated content must be reviewed for accuracy and appropriateness before use. You must not input personal information, confidential, or sensitive company information into any public or consumer AI system, such as ChatGPT.



## Use of Communication Devices

Corporate Information Technology (IT) like phone systems, computers and mobile devices are owned by FortisAlberta and should be used for conducting Company business only. Personal devices and third-party messaging apps must not be used for work related communications. You are allowed minor personal use of IT, provided it does not interfere with your work-related duties. However, you should have no expectation of privacy where Company issued communication devices, such as smart phones, are used for incidental personal use as the systems are configured to log all activity and usage. The logs may be reviewed and monitored for system performance, troubleshooting, compliance with FortisAlberta’s policies and enforcement purposes.

You must not use our communication devices for improper or illegal activities, such as the communication of defamatory, pornographic, obscene or demeaning material, hate literature, inappropriate blogging, gambling, copyright infringement, harassment or obtaining illegal or unapproved software or files.

You must notify the Information Security Officer, IT Security team or IT Service Desk if you know of or suspect any risks that could expose FortisAlberta’s data or information to loss, damage or unauthorized access (e.g., compromised user credentials, stolen assets, phishing emails).

**For more direction, review the General IT Policy, IT Acceptable Use of Technology Policy, and IT Security Policy.**

## Information Use

### Proprietary and Confidential Information

You may handle information that’s confidential to FortisAlberta or create a work product that belongs to us. You are prohibited – during or after service with the Company – from disclosing any confidential or proprietary information about FortisAlberta, or any person or organization with which we have a current or potential business relationship, except when:

- it’s in the necessary course of FortisAlberta’s business;
- it’s authorized under a non-disclosure agreement that’s been approved by the Legal Department;
- you’ve received written authorization from a member of senior management; or
- it’s required by law, as determined after consulting with the Legal Department.

You must disclose any invention, improvement, concept, trademark or design prepared or developed in connection with your employment or contract with FortisAlberta as it is the exclusive property of the Company. When your employment or association with FortisAlberta ends, you must return all proprietary and confidential information to us.

**Q:**

My friends use SnapChat to communicate all the time, and we really like it. I know that some of my co-workers are familiar with the app as well. Is it OK to use this app to communicate with my co-workers?

**A:**

While messaging apps such as SnapChat are fine to use when chatting with your friends outside of work, they should never be used for business purposes. Any communications that pertain to work or contain information that may be relevant to our business should be conducted using official corporate communications channels. The use of these types of “temporary” messaging apps, which erase communications immediately or after a short period of time, could expose our Company to risk, both from a records management and e-discovery perspective, and must not be used for official business purposes. The IT Department should be consulted if you have questions about which apps are permitted to be installed on corporate devices.

### About Confidential Information

Confidential information means all information that’s confidential, proprietary and not public, in any format (including written, oral, visual, electronic or otherwise), that belongs to or arises from a relationship with FortisAlberta.

It includes the following, among other things:

- information about employees or customers
- business plans, budgets, strategies, projections, reports and analyses
- operational data and reports (including materials relating to operating performance measures, processes and training activities)
- financial and tax data and analyses
- legal and contractual matters, including privileged information that is prepared by or shared with counsel in providing legal advice or preparing for actual or possible litigation, and draft regulatory filings

Confidential information does not include information that is or becomes:

- generally available to the public (unless through unauthorized disclosure)
- available from a source other than Fortis (if the source was not prohibited from disclosing the information)

### Protecting Confidentiality

You must comply with the confidentiality provisions of our Disclosure Policy and any similar policy established by FortisAlberta to the extent it applies to your activities.

Follow these best practices:

- Keep confidential information in a safe place with access limited to those who “need to know”
- Use code names for confidential projects
- Don’t discuss confidential information where it may be overheard, such as in elevators, hallways, restaurants, cafes, or public transportation
- Don’t print unnecessary copies and retrieve confidential information from printers immediately after printing
- Only transmit confidential information electronically where it can be done securely (e.g., not over public Wi-Fi)
- Promptly remove confidential information from the room after meetings and destroy if no longer required



## Material Information and Securities Trading

As a subsidiary of Fortis Inc., a company listed on both the Toronto Stock Exchange and New York Stock Exchange, FortisAlberta has certain obligations to assist Fortis Inc. in its compliance and reporting requirements pursuant to the securities laws and stock exchange rules.

Securities legal requirements also govern the disclosure of material information by public companies and insiders. The value of any public company’s securities can rise or fall with the release of information – whether it’s good or bad.

Securities laws prohibit anyone from:

- trading on material information about a public company before it has been generally disclosed (called insider trading); and
- intentionally or unintentionally passing material information to someone before it has been generally disclosed (called tipping).

Insider trading and tipping give an investor an unfair advantage over other investors and thus are serious offences. You are not allowed to trade in FortisAlberta or Fortis Inc. securities if you:

- have material information about FortisAlberta or Fortis Inc. that hasn’t been publicly disclosed and absorbed by the market [you may still be permitted to buy Fortis Inc’s shares under our Employee Share Purchase Plan];
- are an insider and are subject to a trading blackout period; and
- have been notified by the Legal Department that you cannot trade in our securities.

You are also not allowed to trade in another public company’s securities if you:

- acquired material information about that other company that hasn’t been generally disclosed; or
- have been notified by the Legal Department that you cannot trade in securities of that other public company.

As a general rule, you should always refer to our Insider Trading Policy before trading in Fortis Inc’s securities and consult the Vice President, Regulatory and Strategic Affairs, General Counsel if you have any questions.

**For more direction, review the Insider Trading Policy and Disclosure Policies .**



**Q:**

I usually buy some Fortis Inc. shares with my annual bonus. I am currently helping with a major disclosure filing that contains significant new information about Fortis Inc. Can I go ahead and buy the shares anyway?

**A:**

If you have material information about FortisAlberta or Fortis Inc. that has not been generally disclosed, you must not trade in Fortis Inc. securities outside the Employee Share Purchase Plan. Even if you’re not normally considered an “insider” under our Insider Trading Policy, the very fact that you possess material information precludes you from trading. If you have questions about when you can or cannot trade, speak to the Vice President, Regulatory and Strategic Affairs, General Counsel.

### Authorized Spokespersons

Generally, there are only a few individuals who are designated as the authorized spokespersons for FortisAlberta. Unless any of them has specifically asked you to do so, you are prohibited from speaking on behalf of FortisAlberta. You are also prohibited from participating in online communications about FortisAlberta. We also strongly discourage you from participating in social media sites, virtual chat rooms or newsgroup discussions about our competitors or the utility industry (see the Social Media section below for details).

### Social Media

Social media has become a part of our daily lives – we regularly engage in public online conversations through the many platforms at our fingertips. When participating in any social media activity, it is important to use your best judgement and to be mindful of FortisAlberta’s values of Safety, Integrity, Respect, Excellence, and Service.

#### You should follow these guidelines when using social media:

- Don’t engage in discussions about Fortis Inc., FortisAlberta, competitors or the utility industry.
- Don’t disclose confidential or material information about FortisAlberta.
- Don’t speak for FortisAlberta unless you’re an authorized spokesperson acting in that capacity.
- Don’t include the FortisAlberta name, logo or brand in your social media or content, except for example in your bio information on professional networking sites.
- Respect others and avoid disparaging, harassing, “trolling” or illicit language.
- If your post could be seen as speaking for FortisAlberta, add a disclaimer that it is your personal view only.

#### Q:

I finally decided to sign up for Instagram. I want to create my personal account during my lunch break, using my FortisAlberta’s cell phone and work email address. Is that ok?

#### A:

It is acceptable to use FortisAlberta-owned technology for minor personal use provided it does not interfere with your job duties. However, you are not allowed to create any social media accounts with your work email address.

For more direction, review the Social Media Policy.



## Privacy

FortisAlberta may possess personal information relating to personnel, customers and other individuals. Privacy laws generally set out rules regarding the purposes for which personal information can be collected, how personal information must be managed, individuals' rights to know how their personal information is used, and when this information must be deleted.

We protect the privacy of customer information and do not disclose it except in accordance with the Electric Utilities Act Code of Conduct Regulation. We are also committed to preserving the privacy of our personnel and we have implemented practices to prevent the loss of, or unauthorized access to, their personal information under our custody and control.

Personal information is any information about an identifiable individual, such as their name, home address, phone number, date of birth, social insurance number, or credit card information. Personal information does not include an employee's job title or business contact information when it is used or disclosed for the purpose of contacting them in their role as a representative of FortisAlberta.

To the extent that consent to collecting, using or disclosing personal information is required by law, we will assume, unless we are advised otherwise, that you have consented to FortisAlberta collecting, using and disclosing personal information in the way and for the purposes stated in our privacy policies and as allowed under privacy laws.

**For more direction, review the Internal Privacy Policy and External Privacy Policy.**



Table of Contents

Delivering a Cleaner  
Energy Future

About the Code

Compliance With Laws and  
Ethical Decision Making

Being Your Best

Health and Safety

Environment  
and Sustainability

Values and Culture

Acting Responsibly

**Prudent and Ethical  
Use of Our Assets**

Where To Go For Help

Other FortisAlberta  
Policies and Procedures

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## Keeping Accurate Financial Records

We always expect compliance with generally accepted accounting principles and internal controls. All FortisAlberta books of account, records and other documents must accurately account for and report all assets, liabilities and transactions.

You must not:

- cause our accounting and financial books or records to be incorrect or misleading in any way
- participate or assist in concealing an improper transaction
- delay the prompt or correct recording of disbursements
- hinder or fail to cooperate in resolving issues identified in internal or external audit reports
- conceal knowledge of any untrue, misleading or inaccurate statement or record, whether it was made intentionally or unintentionally
- conceal a transaction that does not seem to serve a legitimate commercial purpose or fail to bring it to the attention of appropriate supervisors
- establish or maintain any secret, undisclosed, or unrecorded funds or assets, or otherwise circumvent internal controls or financial authority requirements.

If you have any concerns or complaints regarding questionable accounting or auditing matters, you should follow the guidelines in our Speak Up Policy, including promptly reporting the concern or complaint according to the procedures set out in that policy.

## Records Management

Effective records management facilitates operational efficiencies and business continuity while mitigating litigation and other risks. Legislation also prescribes minimum retention periods for certain business records. All records you create on FortisAlberta's behalf must be retained and destroyed or archived in accordance with all applicable legal, financial, administrative and operational requirements of the Company. Business units may retain the records for a longer period if it is deemed necessary.

Individual business units must follow all appropriate security measures for maintaining records containing personal or other confidential information.

**For more direction, review the Records Retention and Disposition Policy.**



## Where To Go For Help

Following the Code and other FortisAlberta policies and procedures is mandatory. It's your responsibility to speak up or ask for help if you're not sure about something. It's also your responsibility to report it if you believe someone is not following the Code, any other FortisAlberta policy or applicable laws, or if you observe what appears to be accounting or auditing irregularities.

### Filing a Report Personally

You can report an incident personally. For the list of reporting channels available to you, see page six of the Code. Make sure you provide enough information or evidence to substantiate your report and allow for a proper investigation.

### Filing a Report Anonymously

If you do not feel comfortable reporting an incident personally, you can use EthicsPoint to file a report anonymously. Anyone making an anonymous report should be aware that maintaining anonymity could hinder an effective investigation of the incident. As a practical matter, it is also possible that the anonymity of a person who makes an anonymous report may become known during the investigation or resolution of the incident or may become subject to legal disclosure requirements. We therefore encourage you to only report on an anonymous basis where absolutely necessary due to the inherent difficulty in properly investigating, following up on and resolving anonymously reported incidents.

We use NAVEX, a third party that provides confidential, anonymous reporting services 24 hours a day, seven days a week. You can reach them:

**ONLINE:** Go to [ethicspoint.com](https://ethicspoint.com)

**PHONE:** Toll Free **1-866-294-5534**

### What Happens Next

When a report is received, the Director Internal Audit, Risk, and Sustainability Governance will determine if the report was made in good faith and if it warrants an investigation.

All reports made in good faith, and which warrant an investigation will be assigned an investigator based on the nature of the report and the skills required to investigate the incident promptly and independently. Information in connection with the investigation and resolution of the matter will be kept confidential to the extent permissible by law, and the investigator will always try to protect the identity of the persons involved. An investigator may involve management in the investigation as deemed appropriate. You are expected to cooperate with and render assistance to investigators in a forthright and timely manner.

All incidents relating to questionable accounting or auditing matters will be investigated under the supervision of the Audit, Risk and Environment Committee. An investigator may also authorize an independent investigation or engage external consultants or advisors to assist in the investigation. The process can also lead to an external investigation or proceedings with a government or regulatory authority.

We'll communicate the status and, where possible, outcome of an investigation as timely as possible and we will contact you directly if you identified yourself when filing the report. If you filed the report anonymously, you can receive an update using the method you used to make the report. Go on the EthicsPoint website or call the toll-free number and use your report key and password to receive the update.

# Other FortisAlberta Policies and Procedures

This Code references other important governance documents at FortisAlberta. You can find them on our intranet or you can ask Corporate Compliance for a copy:

- Anti-Corruption Policy
- Anti-Corruption Procedures
- Code of Conduct Policy
- Corporate Credit Card Policy
- Disclosure Policy
- Distracted Driving Policy
- Drug and Alcohol Policy
- Environment Commitment Statement
- External Privacy Policy
- Fleet Monitoring Policy
- General IT Policy
- Health and Safety Commitment Statement
- Indigenous Commitment Statement
- Insider Trading Policy
- Internal Privacy Policy
- IT Acceptable Use of Technology Policy
- IT Security Awareness Policy for Contractors
- IT Security Policy
- Political Engagement Policy
- Political Lobbying Procedures
- Records Retention and Disposition Policy
- Reporting Allegations of Suspected Improper Conduct and Wrongdoing (Speak Up) Policy
- Respect In The Workplace Policy
- Social Media Policy
- Supplier Code of Conduct
- Sustainability Commitment Statement
- Travel and Business Expense Policy
- Vehicle Policy
- Violence In the Workplace Policy and Prevention Plan



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The line that connects us all