Supplier Code of Ethics and Business Conduct Policy

Supplier Code of Ethics and Business Conduct applies to Hope Utilities, Inc. and its affiliates (collectively, the "Company" or "Hope") and to all Suppliers that provide goods or services to Hope.

Drive and Sustain a Safety Culture

Our safety first approach focuses on creating an open, transparent and trusting culture where we share experiences, learn from events and collaborate to help protect ourselves, our coworkers, our customers and the general public. We expect our Suppliers to support our safety first approach by adhering to all Hope safety policies and procedures and actively participating in safety learning events, whenever requested.

Suppliers are expected to always treat safety as one of their primary responsibilities; work in ways that prevent injury to themselves, others, and Hope Assets (as defined herein); exercise good judgment; and apply safe and healthy work practices to all activities. Additionally, Suppliers are to:

- Promote and follow all safety and health laws, regulations and procedures
- Speak up and intervene if something appears unsafe
- Require the use of appropriate and Occupational Safety and Health Administration (OSHA) compliant personal protective equipment to protect from hazards where applicable
- Promptly notify Hope of any actual or potential safety, health or environmental hazards or fatalities, injuries, near miss events, or property damage on Hope premises or project sites
- Promptly notify Hope of any contact by a representative of a regulatory agency relating to work performed on behalf of Hope (e.g., OSHA letter)

Establish a Drug Free Workplace

Drug or alcohol use may pose a serious threat to health and safety. It is, therefore, the policy of Hope to establish a "Drug Free Workplace" by preventing substance use or abuse from having an adverse effect on our team, and to provide all of our team a working environment free from alcohol and controlled substance misuse. Hope maintains that the work environment is safer and more productive without the presence of alcohol, illegal or inappropriate drugs in the body or on Hope property. Furthermore, our team has a right to work in an alcohol and drug-free environment, and to work with others free from the effects of alcohol and drugs. Individuals who abuse alcohol or use drugs are a danger to themselves, their coworkers, Hope, and Hope Assets (as defined herein).

Fairly Select Suppliers

Our Suppliers are integral to our success, and we are prudent in our Supplier selection. We are committed to fair and ethical dealings in bid evaluation, negotiation, award decisions and the administration of purchasing and sourcing activities. Our decision to select a Supplier is based on fair and objective criteria, including safety record, technical, commercial or other valid business reasons. Suppliers are therefore expected to cooperate with all due diligence requests and processes received from Hope. However, participation in the bidding or selection process is not a guarantee of selection nor is selection a guarantee of exclusivity.

Suppliers that employ subcontractors to supply goods or services to Hope must disclose the names of all subcontractors upon request. In addition, Suppliers are responsible for ensuring that all such subcontractors comply with this Supplier Code and any other requirements that Hope may establish from time to time.

Respect Each Other

We expect Suppliers to promote and maintain a workplace free from discrimination by treating all customers, employees, agents, subcontractors and Hope site visitors with respect and dignity. In addition, Suppliers are expected to demonstrate zero tolerance for violence, harassment, threats, intimidation, bullying, assault or aggressive conduct, either spoken or written.

If you experience, observe, or are informed of any possible discrimination, harassment, or other unacceptable behavior against yourself or another person, you are expected to promptly report the incident to Hope using one of the reporting options stated in this Code.

Protect Human Rights

Hope is committed to upholding the human rights and ethical treatment of all people — and expects the same commitment from Suppliers.

Suppliers must comply with the letter and spirit of applicable U. S. and international labor and employment laws, and the general principles set forth in the International Labor Organization Conventions, including those associated with equal opportunity, immigration, child labor, forced and trafficked or compulsory labor. Additionally, workers must be fairly compensated for their work and wages should comply with local laws regarding minimum wage, wage payment, and work hours.

In addition, Hope recognizes the right of all employees to select union representation, in accordance with applicable laws. Through collective bargaining, we facilitate positive union relations and promote collaboration on business challenges that impact our operations and workforce.

We expect Suppliers, as legally permitted, to respect rights of workers to associate freely with others, form, and join or not join labor unions or organizations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment and comply with all applicable local and national laws pertaining to freedom of association and collective bargaining.

Reviews and assessments of Supplier employment practices may be conducted to ensure ongoing compliance with employment laws and this Code. Suppliers are expected to fully cooperate during these inspections, provide access to relevant records, and permit interviews with workers where necessary.

Protect the Environment

We reflect our commitment to the environment through our actions. We comply with all applicable environmental laws, permits, conditions and other requirements pertaining to the operation of our facilities. We actively seek Suppliers that share our commitment to environmental preservation, and drive efforts to reduce negative environmental impact. Suppliers must abide by the letter and the spirit of all federal, state and local environmental laws including, but not limited to, pollution, waste disposal, and air emissions. Additionally, Suppliers must comply with all contractual obligations with Hope, and all permits and registrations must be obtained when required. Suppliers are also expected to monitor their environmental impact and implement practices and improvements to minimize harm to the environment wherever possible. Reviews and assessments of environmental practices may be conducted to ensure ongoing compliance with state and local environmental laws and this Code.

Comply Responsibly

Our businesses are heavily regulated by many federal, state and local governmental entities, including the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Securities and Exchange Commission (SEC). In addition, state agencies, such as public utility commissions, pollution control agencies and departments of natural resources have regulatory oversight, and government-sponsored entities. In addition to those specifically called out in this Code, our Suppliers are expected to comply with all applicable domestic and foreign laws and regulations.

Violations of these rules – whether intended or not – can damage our operations, financial sustainability and reputation. If local laws are less restrictive than this Code, Suppliers are expected to comply with the expectations in this Code. Suppliers should implement a compliance program commensurate with their size and risk exposure to prevent, detect and correct issues of noncompliance.

Keep Accurate Books and Records

Accurate and complete record keeping and reporting provide transparency to our stakeholders and help us meet our legal and regulatory requirements. Maintaining financial integrity reflects positively on our credibility and demonstrates our value of trustworthiness.

Suppliers are expected to comply with generally accepted accounting principles (GAAP) when submitting financial records or materials to Hope, and utilize a system of internal controls to promptly, completely and accurately prepare required reports, vouchers, reimbursement requests and invoices. Suppliers must follow all applicable laws and contractual requirements in creating, maintaining and disposing of records created during their performance that accurately and fully reflect their business dealings with Hope. Suppliers are expected to create business records for Hope in an honest and accurate manner and provide copies of such records to Hope upon request.

Conflicts of Interest

Suppliers are expected to conduct their business with Hope based solely on legitimate commercial considerations, act in the best interest of Hope, and to avoid conflicts of interest. Suppliers must avoid any situation in which a personal, financial, familial, or other interest of the Supplier, its employees, officers, directors, or agents (collectively, "Supplier Personnel") conflicts, or could reasonably be perceived to conflict, with the Supplier's duties to Hope or with the integrity of the procurement or business relationship. Conflicts, or potential or perceived conflicts, can occur in many forms and situations. The following examples are not all-inclusive but provide some common situations where actual or perceived conflicts might occur and should either be avoided or disclosed, though the following circumstances are not meant to be an exhaustive list:

- Any Supplier or Supplier Personnel holding a financial interest in a competitor, customer, or other supplier of Hope
- Any Supplier Personnel having a family or personal relationship with an Employee involved in purchasing, contract administration, or oversight of the Supplier's work
- A Supplier employing a current or former Employee (or someone with a close personal or family relationship to an Employee) to perform work for Hope
- A Supplier being partially or fully owned or controlled by a current or former Employee or someone with whom they have a close personal relationship
- A Supplier or Supplier Personnel having access to Hope's proprietary information while providing goods and services to Hope's competitors
- A Supplier or Supplier Personnel providing services to develop a request for proposal (RFP) to be issued by Hope and seeks to bid on the work covered by that RFP
- A Supplier or any Supplier Personnel receiving, directly or indirectly, personal benefits from a transaction or relationship involving Hope

Suppliers must promptly disclose any actual, potential, or perceived conflict of interest to their Hope supply chain management/procurement representative or the Compliance Officer and must follow Hope's written instructions before proceeding. Additionally, Suppliers must inform Hope before entering a business transaction with Hope if any Supplier Personnel has a family member working at Hope or if any Supplier Personnel is a former employee of Hope. Suppliers may be required to complete Hope's Supplier Conflict of Interest Disclosure Form upon request and to update such disclosures if circumstances change.

Suppliers and Supplier Personnel with a known or disclosed conflict must recuse themselves from decisions, negotiations, and communications relating to the matter giving rise to the conflict, unless the Compliance Officer expressly waives this requirement in writing. A Supplier's failure to disclose a conflict of interest, or to take appropriate steps to eliminate or manage a disclosed conflict, may constitute a material breach of the Supplier's agreement with Hope and may result in termination, recovery of damages, or other remedies available at law or under contract.

Nothing in this section limits Hope's separate requirements regarding anti-corruption and anti-bribery compliance, which are addressed in this Code.

For purposes of this Code, "Employee" means any full-time, part-time, or seasonal employees or interns of the Company.

Non-Solicitation

Suppliers and subcontractors must not solicit for employment any current Employee for the purpose of having the Employee provide goods or services to Hope or Hope's customers after their employment with Hope has concluded.

Each former Employee is required to observe a separation period after their employment from Hope, the length of which varies with the service the former Employee is providing but should be expected to be at least a year. There also may be limits to the number of hours a former Employee can charge to Hope depending upon the type of service they are providing. Suppliers are expected to abide by these restrictions and shall not engage in any conduct that may cause a former Employee to violate these post-employment requirements in any way. Please contact your Hope supply chain management/procurement representative or the Compliance Officer for more details or to obtain answers to questions regarding any former Hope personnel.

Protect Company Assets

Solving our customer's energy needs in the most practical and affordable manner is part of our mission, and the resources needed to accomplish this goal are immense. Hope assets include items like equipment, buildings, tools, vehicles, and supplies ("Hope Assets"). Suppliers are responsible for keeping Hope assets safe from inappropriate use, theft, loss, damage or fraud and for properly using these assets in accordance with laws, rules, regulations and policies. Furthermore, taking or using company assets for unauthorized personal use is strictly prohibited.

Suppliers are expected to abide by all access, network security and badging policies established by Hope from time to time. Please contact your Hope supply chain management/procurement representative or the Compliance Officer for more details on these policies.

Safeguard Intellectual Property

Suppliers may not use Hope's name or logo, trademarks or other intellectual property for any purpose without the express written consent of Hope. In addition, Suppliers are prohibited from speaking on behalf of Hope or using Hope's name in any capacity without the prior express written approval of a duly authorized Hope representative.

Handle Information with Care

The information we create and utilize is critical to our success. Suppliers are responsible for properly managing and protecting information against loss and unauthorized access, especially any proprietary, confidential, and restricted information. Suppliers shall abide by all Hope confidentiality policies when receiving, storing, or otherwise collecting any proprietary or confidential information from Hope.

Suppliers shall not collect, store, use, disclose, dispose of or otherwise process personal data in connection with performing any work unless specifically authorized by Hope in writing. Suppliers must also implement and maintain appropriate technical and organizational measures to protect Hope's confidential information and any personal data processed on Hope's behalf against unauthorized access, use, disclosure, alteration or destruction.

Suppliers are also prohibited from using Hope confidential or proprietary information for their benefit, including making financial trades based on material nonpublic information.

Information created and contained within or transmitted via Hope's technology is the property of Hope. Suppliers are prohibited from using Hope's technology for any purpose other than performing the work authorized by Hope in writing. Hope will have access to, and ownership over, all information created, communicated, transmitted and/or stored in Hope information technology systems for any purpose.

In the event of an actual or suspected data security breach involving unauthorized access to information, Suppliers must immediately notify Hope at: cybersecurity@hopegas.com. Supplier must cooperate fully with Hope's investigation and remediation efforts, and provide timely information needed for any required notifications to affected individuals or regulators.

Gifts, Meals and Entertainment

We strive to build good working relationships with our Suppliers, customers and other business partners, and we realize that giving or accepting modest forms of gifts, meals and business entertainment can help build those relationships. However, we must always maintain integrity in our business relationships and remain impartial, objective and free of outside influence. We expect the same from our Suppliers.

Suppliers and Supplier Personnel must never offer personal incentives, gifts, meals or business entertainment to Employees to influence a business decision. Any gift provided to an Employee must be modest in value and designed to create goodwill or strengthen the business relationship. Small or nominal promotional items, gifts and entertainment given in the regular course of business and in accordance with federal, state, local and international laws are generally acceptable. However, care should be taken not to provide business courtesies on a frequent or continual basis.

It can be acceptable for a Supplier and Supplier Personnel to pay for meals and tickets to sports, theater and other entertainment events provided that Hope has a business relationship with the Supplier, the Supplier is present at the event or meal, and the cost of the entertainment is reasonable under the circumstances. If overnight travel is required to attend the event, it is Hope's practice to pay for travel expenses associated with the event.

Providing gifts of cash or a cash equivalent, like a gift card or certificate, stocks or securities, is expressly forbidden. In addition, gifts may not be exchanged during active contract negotiations. Suppliers are also prohibited from providing business courtesies to foreign and domestic public officials and employees on Hope's behalf without the prior express written approval of a duly authorized Hope representative.

Never Bribe

We abide by anti-bribery and anti-corruption laws. We deal with our customers, Suppliers, and the governments of all communities in which we operate in a straightforward and aboveboard manner.

Suppliers and Supplier Personnel must not pay or receive bribes, kickbacks or unlawful payments to or from any public official, government entity or other individual, whether foreign or domestic, to secure any contract, concession or favorable treatment.

This prohibition extends to the payment or receipt of money or anything else of value to consultants, agents or other intermediaries where there is a risk that some part of the payment will be used for a bribe or otherwise to improperly influence action on Hope's or any third party's part. Suppliers are expected to maintain their own anti-corruption policies, conduct appropriate due diligence on the parties with whom they work, and maintain accurate books and records.

Compete Fairly

We believe in fair competition and are committed to complying with all antitrust laws and regulations. Antitrust laws prohibit any agreement or arrangement among competitors that could restrain trade, including agreements to fix prices, divide or manipulate markets, limit production or unlawfully restrict competition. We require our Suppliers to abide by all applicable fair competition and antitrust laws.

Follow Trade Laws

We are committed to complying with all applicable export control and economic sanctions laws of the United States. These laws restrict transfers, exports and sales of products, software or technical data from the United States, or re-export of such United States origin items from countries other than the United States to certain countries, territories and designated parties, based on the nature of the item and/or the "embargoed" status of the recipient. In some circumstances, these laws also restrict the sharing of technical data with foreign nationals located within the United States.

Suppliers are required to comply with United States export control and economic sanctions laws and are prohibited from cooperating in foreign boycotts that the United States does not support.

Appropriately Participate in Political Activities

Hope works with federal, state and local officials on political activities important to our company, Employees, customers and shareholders. We make sure that our interactions are clear, transparent and in full compliance with all laws, regulations and company policies.

Suppliers are prohibited from making representations in connection with political activities on behalf of Hope without prior approval from Hope's Compliance Officer or General Counsel and must ensure all interactions and relationships with public officials are professional and productive and comply with all related laws and regulations.

Ensure Continuity of Operations

Hope expects its Suppliers to manage business continuity risk in terms of ensuring availability of critical services to Hope during a disaster event. Therefore, we expect our Suppliers to have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis, natural disaster or terrorist/security related event. Suppliers are expected to share these plans with Hope upon request.

Contribute to the Community

Suppliers are strongly encouraged to provide resources to support and contribute to the communities and countries in which they operate. Hope welcomes the opportunity to partner with Suppliers through civic projects and programs that benefit our communities and customers. However, Supplier contributions are never required for doing business with Hope.

Report Concerns

Suppliers (and their personnel) must report any conduct of an Employee or Supplier personnel that is perceived as unethical or in violation of Hope's policies, this Code or legal requirements. If a Supplier or its personnel are aware of any suspected misconduct, illegal activities, fraud, or misuse of Hope assets, it is their responsibility to immediately report the concern to Hope.

Hope strictly prohibits any kind of retaliation against any individual who, in good faith, raises an ethics or compliance concern.

Comply with the Code: Investigations and Corrective Actions

It is our goal to build trust-based relationships with ethical suppliers and business partners who comply with this Code. In furtherance of this goal, we take a risk-based approach to training our Suppliers and requiring evidence of compliance with the requirements of this Code. We expect our Suppliers to fully cooperate with our reasonable requests for data, information, certifications, and audit access to verify compliance, and to obtain assurances that their own business partners and producers uphold these principles.

When there is a concern, or Hope becomes aware of facts that indicate a Supplier has breached this Code, our practice is to investigate these incidents and work with the Supplier to develop an action plan to address the concern. However, during an investigation, we reserve the right to suspend all contractual and business operations with the Supplier for any reason. If we determine that an issue cannot be corrected, or a Supplier is unwilling to engage or reasonably cooperate, we further reserve the right to terminate our agreement(s) with that Supplier and pursue any other legal or regulatory rights and remedies that may be available to Hope. For the avoidance of doubt this right to terminate supersedes any language to the contrary in a Supplier's written agreement or statement of work (SOW) with Hope.

We encourage our Suppliers to have due diligence and management systems in place to maintain these minimum requirements. By working closely with our Suppliers, we believe we can achieve mutual success while helping communities and the wider world thrive.

Please contact your Hope supply chain management/procurement representative or Hope's Compliance Officer to obtain information about designated Hope representatives or for questions or details regarding this Code or any other Hope policies referenced herein.

Miscellaneous

This Code may be amended or modified by Hope, from time to time, in its sole and absolute discretion. Any such amendments or modifications to this Code shall be effective upon publication on https://hopegas.com/vendors/, with such publication deemed notice to Supplier effective immediately upon publication on the website. Hope's failure to insist on or enforce strict performance of this Code shall not be construed as a waiver by Hope of any right or any provision it has to enforce its rights provided under this Code or any other contracts or agreements between Hope and Supplier, nor shall any course of conduct, course of performance, or course of dealings between Hope and Supplier or any other party be deemed to alter, amend, change, or modify any provision of this Code. This Code supersedes all conflicting agreements, communications, understandings, or representations included in any purchase order or other document delivered by Supplier, which are hereby expressly disclaimed and rejected.