



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Applicability: All employees of Semptra and the Semptra Companies

Policy Statement

Semptra's core values include acting in an ethical manner when conducting business. Semptra is committed to conducting its business in an open and forthright manner, maintaining high ethical business standards, and not using improper influence to obtain or retain business as set forth in our Code of Business Conduct. All employees of the Semptra Companies as well as anyone authorized to conduct business on behalf of the Semptra Companies shall comply with all applicable anti-corruption and anti-bribery laws, as well as this Policy and any procedures or guidelines that implement this policy.

Semptra prohibits bribery to obtain new, or maintain existing, business or to obtain any improper business advantage.

Bribery can include the direct or indirect giving, promising or offering to give, or authorizing the giving of anything of value, including, but not limited to, cash or cash equivalent, in-kind services, donations, contributions, loans and/or gifts to influence another party.

This policy applies to all employees of Semptra and the Semptra Companies. Good faith efforts shall be made to ensure that other affiliates adopt a policy or follow practices consistent with this policy. Semptra requires Third Party Representatives to act in a manner that is consistent with this policy.

In order to implement this policy, the Semptra Companies may issue from time-to-time various policies, procedures and guidelines related to particular corruption risk areas and business activities.

Books and Records

To prevent the concealment of any Bribes and comply with relevant laws this policy requires that all of Semptra Companies' financial transactions be recorded accurately and in reasonable detail in the company's books and records, and that adequate internal accounting controls be implemented to detect and prevent corruption and bribery.

Violations of Policy

A violation of this policy can result in severe civil and criminal penalties to Semptra Companies and their employees (including imprisonment), under the laws of more than one country. All



countries prohibit Bribery of their own public and/or Government Officials, and many also prohibit the Bribery of officials of other countries. Furthermore, some prohibit commercial Bribery. Violation of this policy by an employee will result in discipline up to and including termination of employment.

Mandatory Reporting

Sempra takes any allegation of Bribery very seriously. All employees are required to report suspected violations of any anti-corruption or anti-bribery laws immediately to the Corporate Compliance Department designee, their Legal Department or to the Ethics Helpline. It is the responsibility of all employees to understand this policy. If any questions or concerns arise about the applicability or interpretations of this Policy, employees should contact the Corporate Compliance Department designee or the Legal Department for guidance.

Required Training and Certifications

All employees who are directly or indirectly involved in activities that could involve contact with a Government Official, and/or who have access to, or control of, funds or accounts relating to such activities are required to complete anti-bribery and anti-corruption training and certifications, which are provided on a periodic basis. Additionally, appropriate employees who are directly or indirectly involved in activities that could involve awarding of supplier or customer contracts are also required to complete anti-bribery and anti-corruption training and certifications, which are provided on a periodic basis.

Note: All references to "Sempra Company/Company" in this document mean a subsidiary or other entity as to which Sempra has majority ownership and control.