



I AM RESPONSIBLE

Supplier Code of Business Conduct

We act with integrity, honesty and respect.

Sempra Energy® Values

We are an ethical, respectful, high performing, forward looking, responsible partner.

Our values define who we are and guide each of us within the Sempra Energy family of companies in conducting our business with integrity, honesty and respect.

Ethical

Do the right thing

- Act with honesty and integrity
- Be open and fair
- Keep our commitments
- Earn people's trust

Respectful

People matter

- Listen, communicate clearly, be candid
- Embrace diversity of people and perspective
- Contribute individually, succeed as a team
- Treat safety as a way of life

High-Performing

Deliver outstanding results

- Set tough goals and achieve them, act with urgency
- Reward superior performance, acknowledge successes
- Learn and improve
- Be accountable

Forward-Looking

Shape the future

- Think strategically and critically
- Anticipate market needs
- Actively pursue and create opportunities
- Implement with discipline, manage risks

Responsible Partner

Create positive relationships

- Engage others, seek feedback, collaborate
- Support our communities
- Be a responsible environmental steward
- Do what we say we'll do

The Ethics & Compliance Helpline is available globally 24 hours a day, seven days a week at [SempraEthics.com](https://www.sempraethics.com) or by calling (800) 241-5689 (United States), 001-770-582-5249 (Mexico), 600-320-1700 (Chile), 0800-7-0690 (Peru)

Sempra Energy, based in San Diego, CA, is a Fortune 500 energy services holding company. With 17,500 employees worldwide, the Sempra Energy companies develop energy infrastructure, operate utilities, and provide related products and services to more than 31 million consumers worldwide.

This Code contains general requirements applicable to all suppliers to the Sempra Energy family of companies. Particular supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will control.

A Message from Sempra Energy's Co-Chief Compliance Officers

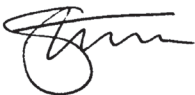
Since Sempra Energy's formation in 1998, we have experienced dramatic growth. What has not changed is our commitment to act with integrity in accordance with the highest ethical standards. We do not and will not compromise the laws and regulations that govern our business conduct standards.

The Sempra Energy family of companies expects our suppliers to embrace our commitment to integrity and conduct their business in compliance with all laws, rules and regulations. We understand that suppliers are independent entities. Nevertheless, a supplier's business practices and actions can impact and reflect upon Sempra Energy. The supplier Code of Business Conduct is based on the same standards that apply to all Sempra Energy employees.

As suppliers, your workforce, agents and subcontractors should know that Sempra Energy's family of companies expects them to understand and comply with the standards established in the Supplier Code of Business Conduct. They should know that non-compliance can alter our business relationship and could result in the termination of that business relationship.

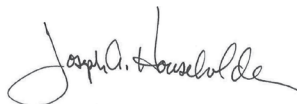
Thank you for the service you provide Sempra Energy. Each of you, as suppliers to the Sempra Energy family of companies, continue to be an important part of our ongoing success and we value our shared commitment to conduct business with integrity, honesty and respect.

Sincerely,



Steven D. Davis
Corporate Group
President of Utilities
and Co-CCO
Sempra Energy

Sincerely,



Joseph A. Householder
Corporate Group President of
Infrastructure Businesses
and Co-CCO
Sempra Energy



Steven D. Davis



Joseph A. Householder

Health and Safety

Sempra Energy is committed to the safety and health of its employees, customers, suppliers and the communities in which we operate. Our suppliers are expected to provide a safe working environment that supports accident prevention and minimizes exposure to health risks. It is the supplier's responsibility to know and understand the health and safety laws and regulations impacting the goods and services they provide and to fully comply with those laws and regulations.

Legal and Regulatory Compliance

Suppliers and their agents will conduct their business activities in compliance with all applicable laws and regulations, including those that deal with bribery, kickbacks, unfair pricing, unfair marketing, or misrepresentation of products or services. Suppliers must be in full compliance with laws that include, but are not limited to:

- Antitrust and fair competition laws
- Anticorruption laws of the countries where the supplier does business, including the United States Foreign Corrupt Practices Act, and UK anti-bribery act and Mexican law
- Laws and regulations associated with insider trading

Suppliers are expected to comply with all applicable employment laws and regulations including, but not limited to, state, federal and applicable in-country laws and regulations regarding:

- Equal employment opportunity
- Compensation and benefits
- Child labor
- Freedom of association
- Forced or compulsory labor
- Workplace harassment and discrimination
- Working hours
- Payment of wages
- Verification of employment eligibility (using E-Verify when required by law)
- Health and safety
- Whistleblower protections

Sempra Energy is an equal opportunity employer and federal contractor or subcontractor. Consequently, our vendors, contractors and suppliers must abide by the requirements of 41 CFR 60-1.4(a), 41 CFR 60-300.5(a) and 41 CFR 60-741.5(a), where they apply. These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity or national origin. These regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability. Our vendors, contractors and suppliers must also abide by the requirements of Executive Order 13496 (29 CFR Part 471, Appendix A to Subpart A), relating to the notice of employee rights under federal labor laws, where it applies.

Information Protection and Confidentiality

If you are granted access through electronic or physical means to Sempra Energy's non-public information to perform Sempra Energy-related work, the information may only be used for Sempra Energy business. Such use must be in accordance with all applicable laws, regulations and contractual obligations. Non-public information provided by Sempra Energy and/or its business partners could include, but is not limited to, financial, customer, employee or other business information. Non-public information accessed by suppliers must be limited to only that information that is required to perform the contracted work.

Suppliers must keep non-public information confidential and may only disclose non-public information if it is necessary for the performance of their work. Such disclosures may be made only to those people who are also subject to Sempra Energy's confidentiality provisions and have a legitimate business need to know. Non-public information contained in electronic or physical form must be appropriately secured and protected.

Suppliers will not make any announcements or release any information on behalf of Sempra Energy, to any member of the public, press, official body, business entity, or other person, or claim or imply any endorsement by Sempra Energy or Sempra Energy employees without the prior and appropriately authorized written consent of Sempra Energy.

Use of Sempra Energy Assets

All Sempra Energy assets must be used for the purpose in which they are provided and in compliance with all contractual terms, environmental, health and safety laws and regulations. Suppliers may not use, reproduce, access, modify, download, distribute or otherwise copy any copyright-protected works, trademarks or patents of others, including licensed software and related documentation without the written authorization of the owner.

Suppliers may be granted access and permitted to use Sempra Energy's computer network which may include access to a variety of proprietary and licensed applications. Sempra Energy reserves the right to monitor the use of, and/or examine or search company property provided to suppliers. Use of any Sempra Energy entity name or logo ("co-branding"), trademarks or patents, without the express written consent of Sempra Energy is prohibited.

Affiliate Rules

Sempra Energy businesses are regulated by, or impacted by, state and federal laws as well as rules and regulations of the California Public Utilities Commission and the Federal Energy Regulatory Commission. A significant number of the laws, rules and regulations restrict the flow of non-public information between certain Sempra Energy-affiliated companies. Suppliers need to understand the affiliate rules affecting their respective responsibilities to Sempra Energy and should ask their business contact if they have questions, issues or concerns regarding the sharing of information.



Environmental Protection and Sustainability

Sempra Energy is committed to protecting and conserving the environment for the benefit of our employees, customers and the diverse communities in which we operate and provide service. It is the supplier's responsibility to know and understand the environmental issues associated with the production of goods and services they provide. Like Sempra Energy, we expect our suppliers to be good stewards of the environment. We value suppliers that evaluate their operations, products and services from a total lifecycle perspective in order to propose and implement effective policies and measurable improvements in areas such as:

- Environmental metrics tracking
- Reuse & Recycling
- Air emissions reductions (Volatile organic Compound-VOC's, Greenhouse Gas-GHG's)
- Land restoration
- Responsible resource utilization
- Environmental incidents elimination
- Energy and water use minimization
- Waste reduction

Sempra Energy values suppliers who disclose their corporate sustainability results and set measurable goals that reduce environmental impacts.

Supplier Diversity

Sempra Energy values diversity in our workforce and supply chain. Our companies are committed to maximizing opportunities for women, minority, disabled veterans and LGBT-owned business enterprises. We demonstrate our commitment by mentoring many strategic, low-cost, and highly-capable diverse business enterprises. Sempra Energy searches for suppliers that share this commitment.

Supplier Behavior

Sempra Energy expects its suppliers to cooperate with its provision of a workplace free of harassment and discrimination.

Sempra Energy will not tolerate behavior that might discriminate, intimidate, harass, disrupt or interfere with anyone performing work for, or on behalf of, Sempra Energy. Everyone has a role to play in ensuring that the workplace, whether it is in an office or construction site, is free of harassment and discrimination.

Sempra Energy does not allow the use of alcohol or illegal drugs or the use of prescribed drugs that might impact safety while performing work for the company. Suppliers must ensure that their employees comply with this policy.

Business Gifts and Courtesies

Exchanging gifts and courtesies may be acceptable under certain conditions, but are never required to conduct business with the Sempra Energy family of companies, nor should these ever be requested by one of our employees. In fact, excessive business gifts and courtesies can raise ethical and legal questions that could harm suppliers and Sempra Energy. Modest gifts, entertainment or courtesies are permissible if:

- They are consistent with accepted business practices and of routine value as determined by local or industry practices
- Public disclosure would not reflect adversely on the companies or the people involved
- The transaction has been disclosed to a Sempra Energy supervisor if the gift or courtesy is more than a mere token
- The supplier's own Code of Business Conduct permits the gift or courtesy
- Supplier gifts and courtesies to Sempra Energy should never suggest or imply a desire for special treatment such as awards for supply, work or other goods or service procurements

Conflicts of Interest

A conflict of interest arises when a supplier's interests or activities influence (or appear to influence) their ability to act in the best interest of Sempra Energy. Arrangements that may cause a conflict of interest may include, but are not limited to:

- Having a significant financial interest in another company in our industry
- Having access to Sempra Energy's proprietary information while providing goods and services to competitors of Sempra Energy
- Having family members or others of a close personal relationship working for any Sempra Energy company

Suppliers should immediately disclose actual or potential conflicts of interest.

Business Records

Accurate records and disclosures (financial, regulatory, etc.) are critical to Sempra Energy's success and reputation. Sempra Energy requires that internal controls over operational and accounting records are adhered to and that all transactions, including invoices, billings and other supporting records, are in compliance with all accounting standards, applicable laws and regulations. Sempra Energy expects that suppliers never misstate facts or material information related to business performed for, or on behalf of, Sempra Energy.

Reporting Concerns

If you have any questions about Sempra Energy's Supplier Code of Business Conduct, or have concerns about compliance or ethics issues while working with our company, we encourage you to use one of the following reporting methods:

- Talk to your Sempra Energy business contact
- Contact Sempra Energy's Ethics and Compliance Helpline 24 hours a days, seven days a week at SempraEthics.com or by calling the appropriate number below:
 - > United States: (800) 241-5689
 - > Mexico: 001-770-582-5249
 - > Chile: 600-320-1700
 - > Peru: 0800-7-0690

Anyone who reports a concern has the choice to remain anonymous.



...committed to acting with integrity and in accordance with the highest ethical standards!

