

A large, stylized image of a high-voltage power line tower, silhouetted against a sunset sky. The tower is the central focus, with power lines extending from it. The sky transitions from a deep purple at the top to a bright orange and yellow near the horizon. The tower's structure is intricate, with multiple cross-arms and insulators. The overall composition is symmetrical and dramatic.

# I AM COMPLIANCE

**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.

United States: (800) 241-5689 Mexico: 001-770-582-5249 Chile: 600-320-1700 Peru: 0800-7-0690 [SempraEthics.com](http://SempraEthics.com)

# A Message from Sempra Energy's Chairman and CEO



Dear Fellow Employees:

Upholding high ethical standards – doing the right thing by our key stakeholders and each other – has been critical to Sempra Energy's ongoing success. Whether you have been with the company a few weeks or several decades, your role requires an ethical responsibility to each other and to our shareholders, customers, regulators and the communities we serve. It requires that each of us be aware of the trust each of our stakeholders have placed upon each of us and for each of us to take every step to ensure that trust is maintained, in a safe and ethical manner. The Code of Business Conduct is intended to provide guidance on who we are as employees of Sempra Energy and its family of companies and to ensure we all know the values and workplace guidelines from which this trust is derived.

I encourage you to know and understand our Code of Business Conduct and the supporting policies outlined within it. This Code is a valuable reference tool so keep it accessible and refer to it in those times when ethics and compliance questions arise. Should you become aware of an unsafe or unethical situation or if you have a question and seek guidance, from our Ethics & Compliance Helpline, talk to your supervisor or one of the contacts listed in the Code. Sempra Energy will not tolerate retaliation against any employee who, in good faith, raises and reports a concern.

One of the greatest pleasures of my career at Sempra Energy has been the opportunity to work alongside such a great, talented group of people – people who live our high ethical standards and core values every day. Thank you for abiding by our Code of Business Conduct.

Sincerely,

A handwritten signature in black ink that reads "Debbie Reed". The signature is written in a cursive, flowing style.

Debbie Reed  
Chairman  
Sempra Energy

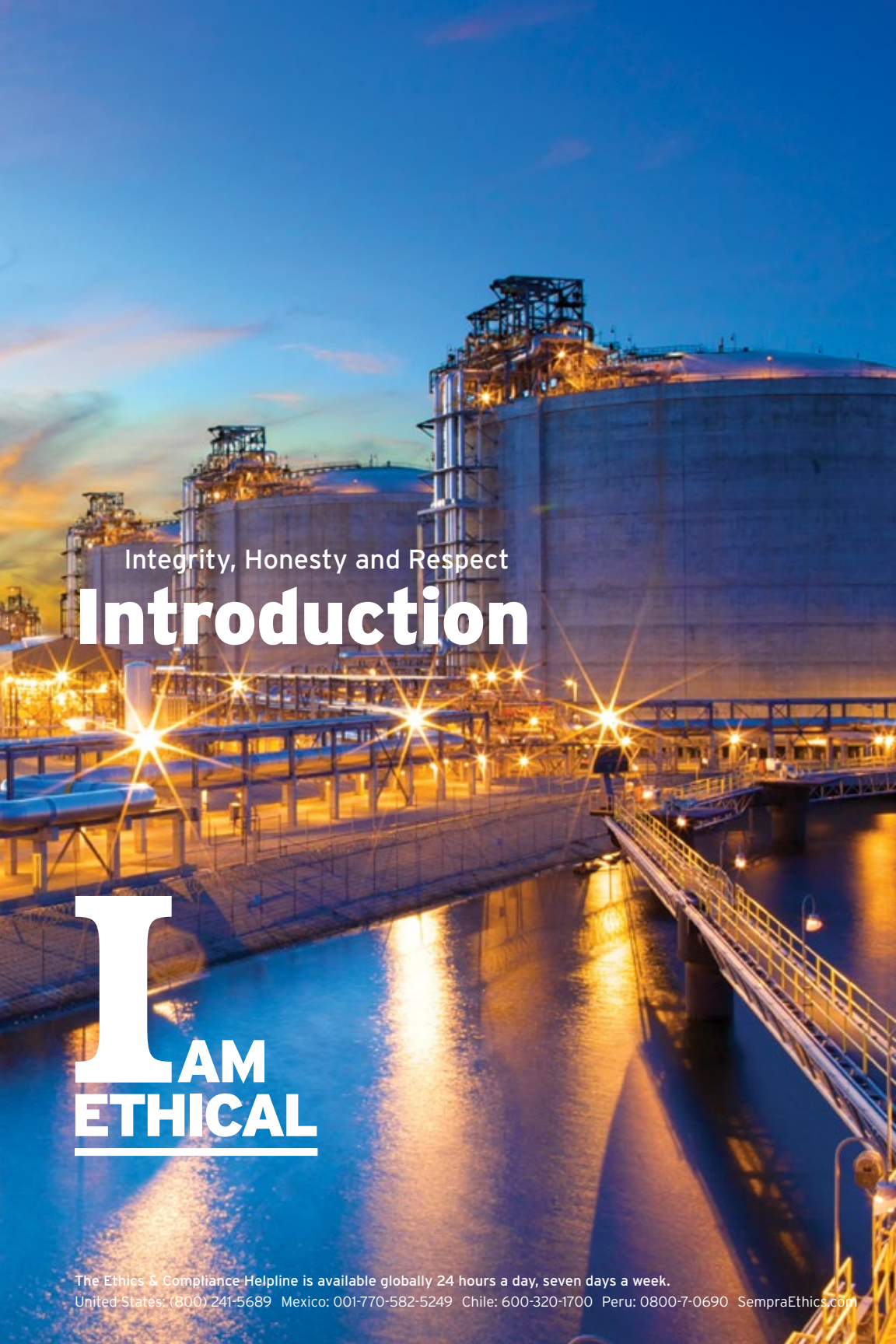


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# Table of Contents

Introduction .....	4
Business Conduct – A Personal Responsibility .....	5
Making Ethical Decisions and Reporting Concerns .....	6
Retaliation is Not Tolerated .....	7
Integrity, Honesty and Respect – <b>In Our Workplace</b> .....	8
Safety Matters – Every Day; Every Place.....	9
Discrimination and Harassment Free Workplace .....	10
Violence in the Workplace .....	11
Substance Abuse .....	12
Confidential Information and Privacy.....	13
Integrity, Honesty and Respect – <b>In Our Communities</b> .....	14
Environmental Protection .....	15
Charitable Activities .....	16
Political Engagement.....	16
Anti-Bribery and Anti-Corruption, Anti-Money Laundering.....	18
Business Gifts or Courtesies .....	19
Integrity, Honesty and Respect – <b>In Our Marketplace</b> .....	20
Fair Competition .....	21
Regulatory Compliance.....	22
Conflicts of Interest.....	23
Intellectual Property .....	24
Integrity, Honesty and Respect – <b>For Our Shareholders</b> .....	26
Financial Records .....	27
Internal Business Controls .....	28
Company Assets .....	28
Media Relations and Online/Social Media .....	30
Information Management.....	31
Securities Trading.....	32
Resources for More Information and Help.....	33

*About our Code:* This *Code of Business Conduct* can change as laws and regulations change. Please refer to the Index of Corporate Policies for the most up-to-date policies, which serve as the governing documents for these standards. You can find these policies by clicking “Corporate Policies” under the SempraNet Contents section. Also, each member of the Sempra Energy family of companies may have its own unique policies that you can find on each company’s intranet site.

A photograph of an industrial facility, likely a refinery or chemical plant, at night. The scene is illuminated by warm yellow lights from various structures, creating a strong contrast with the deep blue twilight sky. Large cylindrical storage tanks and complex piping systems are visible. The lights create a starburst effect, and their reflection is seen on a body of water in the foreground. The overall atmosphere is one of industrial activity and modern infrastructure.

Integrity, Honesty and Respect

# Introduction

**I** AM  
**ETHICAL**

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## Business Conduct – A Personal Responsibility

All of us within the Sempra Energy family of companies are responsible for behaving in a manner that reflects positively on both our personal reputation and the reputation of the company. No matter our specific job, we are each responsible for:

- Complying with all applicable laws, regulations and company policies,
- Maintaining appropriate ethical behavior,
- Being alert and sensitive to situations that could be illegal, unethical, and improper or in violation of this Code of Business Conduct or our policies and;
- Reporting actual or suspected violations of our Code of Business Conduct or company policies.

Sempra Energy's *Code of Business Conduct* ("Code") is our standard for maintaining a legally compliant and ethical workplace. The Code is based on these basic principles:

- The Sempra Energy family of companies conducts business in compliance with international, federal, state and local laws and regulations affecting our businesses.
- We each consistently conduct ourselves in a lawful manner and follow the company's values and ethical standards.

Our Code provides the information, support and resources to help ensure we act ethically and in compliance with laws and regulations that affect our business. We are each responsible for reading the Code and asking questions whenever something isn't clear.

Although applicable laws may vary from state to state or country to country, our Code applies to all employees within the Sempra Energy family of companies, worldwide. Also, each Sempra Energy company may have policies beyond those described within this Code.

We are each responsible for knowing the policies and practices applicable to our workplaces.

From time to time we are required to complete compliance training or participate in policy review meetings and to acknowledge that we understand and comply with our Code. Failure to adhere to the standards of conduct outlined in the Code could result in disciplinary action, up to and including termination of employment.

## Q&A

**I have a good relationship with my supervisor and would prefer to raise any questions or ethical concerns with her rather than contacting the Ethics & Compliance Helpline. Is this acceptable?**

*Yes. The Sempra Energy family of companies has an open door policy where employees are encouraged to discuss issues with their supervisor and in-line management. Your best resource is generally your direct supervisor. If that is not possible or your supervisor cannot resolve the issue, you can bring it to the attention of the next level of management, Human Resources, the Chief Ethics Officer or the Ethics & Compliance Helpline.*

## Q&A

**I think my supervisor is doing something that the Code of Business Conduct says is wrong. I'm afraid to report him because he may make my job more difficult for me. What should I do?**

*If you don't feel comfortable talking to your supervisor about it directly, you may contact the next level of management, Human Resources, the Chief Ethics Officer or the Ethics & Compliance Helpline where concerns can be raised anonymously. As discussed in the next section, the company strictly prohibits retaliation.*

Those with leadership roles within the Sempra Energy family of companies have added responsibilities.

Leaders must:

- Ensure that the people who report to them understand the company's expectations for legally compliant and ethical behavior as conveyed in this Code,
- Set an example of compliance by behaving in a way that demonstrates what it means to act with integrity, honesty and respect,
- Foster an environment where employees feel comfortable asking questions and reporting issues and;
- Support employees who, in good faith, raise questions or concerns.

## Making Ethical Decisions and Reporting Concerns

Keep in mind our Code can't cover every situation that might arise on the job. Instead, its guidance and examples describe expected behaviors and methods of ethical decision making.

If you're ever faced with an uncertain situation in your workplace, ask yourself:

- **Which course of action is legal and within company policy?**
- **Which decision is fair, honest, appropriate and consistent with Sempra Energy's ethical values?**
- **Have you discussed the situation with another appropriate person?**

Our obligation to comply with this Code means, in part, that we must bring any known or perceived violation of our Code or the law to the attention of appropriate company resources listed on the inside back cover of this Code.

By raising concerns and asking questions, we protect ourselves, our coworkers and our company.



Promptly report any known or possible violation to:

- Your supervisor or the next level of management
- Your Human Resources Department
- Sempra Energy's Chief Ethics Officer – Ethics@sempra.com
- The Ethics & Compliance Helpline –
  - > Website – SempraEthics.com
  - > In the U.S. call: 800-241-5689
  - > In all other countries call:
    - Mexico: 001-770-582-5249
    - Chile: 600-320-1700
    - Peru: 0800-7-0690

Whether you call or use the online reporting website, the Ethics & Compliance Helpline is available 24 hours a day 7 days a week and provides the option to report anonymously. Every report made to the Ethics & Compliance Helpline is investigated in a timely manner.


## Retaliation is Not Tolerated

Any employee, who in good faith, seeks advice, raises a concern or reports violations is not only following this Code, but is doing the right thing. Sempra Energy supports employees who do the right thing and will not tolerate retaliation against any employee. Reporting in “good faith” means accurately providing all of the information you believe to be true and doing so without improper motive.

Claims of retaliation are taken seriously. Retaliation can take many forms, but generally includes any negative action taken against someone for raising a concern or reporting misconduct. A company investigator will look into all allegations of retaliation and appropriate action will be taken. Anyone found responsible for retaliating against an employee is subject to disciplinary action, up to and including termination of employment.

If you suspect that you or someone you know has experienced retaliation, contact any of the resources listed at the end of this Code.

**Learn More** > *To increase your understanding; please refer to Sempra Energy's Ethics & Compliance – Reporting and Investigating Concerns policy.*



Integrity, Honesty and Respect

# In Our Workplace

**I** AM  
**RESPECTFUL**

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## Safety Matters – Every Day; Every Place

Working safely is a priority at the Sempra Energy family of companies. Our safety-first attitude extends to all aspects of our operations. This philosophy means providing a safe work environment for everyone: employees, contractors, customers and the general public. Safety remains the foundation for everything we do and everywhere we go – from initial employee training to the construction, operation and maintenance of our facilities and the service provided to our customers.

Laws, regulations and reporting requirements relating to employee and public safety affect nearly all aspects of our company's business, therefore:

- We comply with all applicable international, federal, state and local health-and-safety laws and regulations,
- Safety is never compromised and;
- No activity is so important that it should jeopardize employee, contractor, customer or public safety.

If you see a potential safety problem or violation, or if you have questions, discuss them first with your supervisor. If unable to do so or you're not satisfied with his or her explanation, pursue your concern through higher levels of supervision or contact any of the resources listed at the end of this Code. Remember, you have a right and an obligation to stop any job when an unsafe situation arises.

**Learn More** > To enhance your understanding of these situations; refer to Sempra Energy's Safety policy as well as the Environmental & Safety Compliance Plan.



## Q&A

**What should I do if I see an unsafe condition while I'm at work?**

*We have no higher priority than safety. You should take immediate action to correct or report the unsafe condition. If you are asked to do something you think is unsafe, raise your concerns with your supervisor. If you feel a job has become unsafe, stop the job until the safety issues are resolved. If you see a coworker working unsafely, point out the risk and encourage him or her to work safely. We all share responsibility to foster an injury-free workplace.*

## Q&A

**My supervisor is very passionate about his work, but sometimes in his excitement, he'll start to yell at me and my coworkers. I hate being treated this way, but I'm afraid that if I say anything, my supervisor will decide I'm not tough enough to succeed at my job. What can I do?**

*You need to talk to someone about your supervisor's behavior. While bullying isn't illegal, it violates the company's value of being "Respectful". You can go to Human Resources, another level of management within your organization or you can contact the Ethics & Compliance Helpline. Be assured that you won't face retaliation for speaking up. Making sure that company leaders know about possible issues, such as this example of potential workplace bullying, means the company has a chance to solve problems quickly – so that you and your coworkers have a respectful and professional work environment.*

## Discrimination and Harassment Free Workplace

The Sempra Energy family of companies is committed to providing all employees with the same opportunities for success, without regard to race, color, national origin, ancestry, citizenship, religious creed, physical or mental disability, medical condition, genetic information, marital status, sex, sexual orientation, gender, gender identity, gender expression, age, military status, political affiliation or any other characteristic protected by law.

The company will not tolerate discrimination, harassment or bullying. We treat our coworkers, customers, suppliers and contractors with respect, fairness and dignity.

Remarks, jokes, pictures or behaviors that are offensive or discriminatory in any way are not allowed in the workplace. Bullying is any unwelcome or unreasonable behavior that demeans, intimidates or humiliates employees either as individuals or as a group. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating it.

If you see or suspect bullying, discrimination or harassment at work, contact your supervisor, Human Resources, the Chief Ethics Officer or the Ethics & Compliance Helpline.

A supervisor who becomes aware of possible bullying, discrimination or harassment must report the situation to the proper company contact at once. Any supervisor who fails to do so is subject to disciplinary action, up to and including termination of employment. The company will promptly investigate all reported incidents and take proper action without retaliation.

**Learn More >** *To increase your understanding; please refer to Sempra Energy's Discrimination & Harassment Free Workplace policy.*

## Violence in the Workplace

The Sempra Energy family of companies is committed to maintaining a work environment free from violence, threats, aggression or intimidation. We will not tolerate:

- Any weapon, including firearms, explosives, or bullets at the workplace, except for duly authorized law enforcement, Corporate Security, or contract personnel. At locations where this prohibition conflicts with national, state, or local laws, site-specific policies must be developed that comply with those laws and must be followed.
- Threats or actions that create a real or potential hazard for employees or others,
- Violent physical contact or actions, violent verbal or written statements, or threats of violence against employees or their families or;
- Harassment, stalking, or any action that creates a real or perceived threat.

We must not make threatening statements or engage in threatening actions, or appear to do so. Anyone working on the company's behalf who acts violently or makes threats affecting the workplace is subject to disciplinary action, up to and including termination of employment. Additionally, we will cooperate with law enforcement authorities in criminal prosecutions against offenders.

Guidelines for reporting: If you see a violent physical act that involves immediate danger or think such an act may take place, call local law enforcement officials immediately. Once you are safe, please be sure to make a follow-up call to Corporate Security.

If you see any threat or action that doesn't appear as an immediate danger, you should promptly report it to Corporate Security.

- United States: (619) 725-8611
- Mexico: 001-69-725-8611
- Chile: 56 32 245 2893
- Peru: 99 358 8877

It's crucial that any supervisor who becomes aware of imminent or actual violence report it at once as set forth above. Failure to take immediate action can result in disciplinary action, up to and including termination of employment.

**Learn More** > To increase your understanding of these situations; refer to Sempra Energy's Physical Security, and Violence in the Workplace policies.

## Q&A

**A coworker has been visibly frustrated and agitated while working over the last week. I don't know if he's having personal problems outside of work or if something else is causing it, but I'm concerned it will get worse. How do I handle this?**

*Your concerns are valid and you can help the situation by discussing it with your supervisor or any of the contacts listed in this Code. If you ever feel threatened or in danger, don't hesitate to speak up; you can, and should, contact your supervisor, Corporate Security, Human Resources, the Chief Ethics Officer, the Ethics & Compliance Helpline or any of the resources found listed at the end of this Code.*

## Q&A

**I'm taking prescription medication that could inhibit my ability to work but I don't want to tell my supervisor because I don't want to reveal my medical condition. Do I have to tell my supervisor what kind of medication I am taking and why I am taking it?**

*No, you are not required to tell your supervisor the type of medication you are taking or why you are taking it. However, you do have an obligation to inform your supervisor about the effects of any medication that you and your treating physician believe could impact your ability to perform your job (i.e., inability to drive or operate heavy machinery, drowsiness). You may thereafter be asked by Human Resources/Employee Care Services for clarifying information and asked to work with them to make a determination about whether you are able to perform your work safely and efficiently.*

## Substance Abuse

We must report to work fit for duty and capable of correctly performing our jobs in a safe and efficient manner. The following types of conduct are prohibited and could lead to discipline up to and including termination of employment:

- Reporting to work in an unfit condition to perform your job and work safely due to the use of drugs or alcohol,
- Possessing illegal drugs during working hours or on company property,
- Using drugs or alcohol that affect your job performance or;
- You refuse to submit to testing.

The company's Substance Abuse & Testing policy includes pre-employment and reasonable-cause testing for all employees. We also conduct random and other testing in some work groups as required by certain government agencies.

Our company offers access to and encourages the use of the Employee Assistance Program, which provides confidential counseling and other assistance to full-time employees and their families.

**Learn More >** *To increase your understanding of the company's policy on substance abuse, refer to Sempra Energy's Substance Abuse & Testing and Reasonable Accommodation policies.*



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## Confidential Information and Privacy

We all have a duty to protect any confidential information we learn of or encounter during the course of our company jobs. We must be familiar with the applicable laws, contractual obligations and company policies governing the information we access, use and transmit. If you're unsure about the specific requirements at your work location, ask your supervisor for guidance. We only use confidential information for company business and only disclose it to those with a business need to know, keeping in mind at all times, the company's affiliate compliance guidelines and other information protection policies.

Some examples of confidential information are: employee or customer personal data (such as name, address or government-issued identification), technical information, customer lists, terms, conditions, rates or fees offered to customers, pricing policies, budgets, marketing and strategic plans, intellectual property or any content labeled "Restricted" or "Confidential".

The company respects the privacy of every employee and customer and collects and retains private, personal information only as required by law or for the company's effective operation. We must protect and limit access to personal employee, business partner and customer information, limiting access and usage only to authorized personnel and only for appropriate business purposes.

- You must take care not inadvertently share or lose files or devices containing confidential information.
- You must pay careful attention to what information you discuss, and where the discussion is taking place to ensure you are not overheard.
- You may not take proprietary documents if you are leaving employment with the company, unless your supervisor and your Human Resources Department grant approval. You always have the right to go the government to report something that you believe violates the law. If making such a report requires that you disclose confidential information, you can do that as long as you only disclose as much as is necessary to make the report, and only to those directly involved in the reporting.

The Company will not retaliate against you in any way for a disclosure made in good faith.

**Learn More** > To increase your understanding of these situations, refer to *Sempra Energy's Confidentiality, Fair Disclosure, Privacy, Information Security and Information Security Acceptable Use policies*.

## Q&A

**I know that some of the information I work with is confidential. Does that mean I can't talk about it with anyone, even other employees?**

*Confidential means that you should keep the information secure. Discuss such information only with those who need to know for company business purposes. If you have doubts, ask your supervisor.*

**If I find some documents in a copier or in a conference room labeled as confidential, what should I do?**

*Documents labeled as confidential are intended for a limited audience and you should avoid reading the content. If you cannot locate the owner, turn the documents over to your supervisor. Do not leave the documents in the copier room or in the conference room and do not throw them away.*



Integrity, Honesty and Respect

# In Our Communities

**I** AM  
**A RESPONSIBLE PARTNER**

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## Environmental Protection

The Sempra Energy family of companies is committed to protecting and conserving the environment.

Environmental protection laws, regulations and reporting requirements affect nearly all aspects of our company's business. We comply with all such laws that apply to our business, whether they are international, federal, state or local.

We are each responsible for familiarizing ourselves with the specific environmental protection requirements for our jobs.

If you see a potential problem or violation, or if you have questions, please report the situation right away to your supervisor, Legal or contact the Ethics & Compliance Helpline.

**Learn More >** *To increase your understanding of these situations; refer to Sempra Energy's Environmental Policy and Environmental & Safety Compliance Plan.*



## Q&A

**We had a small spill recently that we took care of quickly but I'm pretty sure nobody notified management. No one wants the paperwork, the aggravation or the possible expense of a government fine. What's our stance on this?**

*We will obey the law. We are responsible for being good environmental citizens - this means not only prompt, effective clean-up but also accurate and honest reporting of any problems in compliance with all applicable laws and regulations. Any event that threatens the environment or our reputation must also be reported to your supervisor in accordance with company policy.*

## Q&A

**We have a piece of equipment we no longer use. The local university says they can use it for teaching purposes. How can we donate this?**

*In general, the company makes very limited in-kind donations. They do require prior approval. Contact the community relations representative at your business unit to determine if the donation is appropriate. If so, coordinate with the appropriate departments to ensure this is done within company guidelines.*

## Charitable Activities

We're proud of our long-standing commitment to the communities where we live and work. We maintain this focus by investing time, talent and financial resources to improve the quality of life for our customers, neighbors and employees. The Sempra Energy Foundation offers a range of programs to support employees in giving back to our communities.

To ensure that charitable contributions or corporate memberships made on behalf of the company are in the company's best interest, they must be pre-authorized by your business unit's community relations representative. This includes financial gifts, donations, sponsorships, underwriting, membership payments or in-kind gifts made to charitable groups or institutions or to qualified non-charitable civic or community groups.

Also, your business unit's community relations representative should review any volunteer activities, governmental jobs and not-for-profit board service that use company resources, or relate to the company or an employee's role with the company before any such activity is undertaken.

**Learn More >** *To increase your understanding of these situations, refer to Sempra Energy's Contributions policy or the Employee Giving Programs, Sempra Energy Foundation and Sempra Energy Giving Network websites found in the "Events, Community, Employee Groups" section on SempraNet.*

## Political Engagement

The Sempra Energy family of companies considers engaging with policymakers to be an important, necessary and appropriate part of doing business – as long as it is conducted in a legal and transparent manner.

Our company contributes to candidates, political parties and ballot measures in the U.S. only as allowed by law. We never make political contributions outside the United States. The company is prohibited by federal election law from using corporate funds to make contributions to federal candidates. However, eligible employees who are U.S. citizens or have been admitted for permanent residence may contribute to the company's political action committee (SEEPAC), which directly supports candidates for elective office at the federal level.

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As individuals, you may support the candidates and ballot measures of our choice, but you may never seek reimbursement from the company for a personal contribution to any political campaign. No one in the company may put improper pressure on a fellow employee to contribute to, support or oppose any political group, candidate or ballot measure.

Employees may not work on political or ballot measure campaigns during working hours, or use company facilities, resources or time for that purpose, without prior approval from your supervisor and the Corporate Responsibility Department.

Communicating with any local, state or federally elected or appointed governmental official, agency or their staffs may be considered lobbying and may require you to register as a lobbyist and/or report any such contact. Obtaining permits in certain jurisdictions may also be considered lobbying. If you think lobbying restrictions may apply to your work, contact the Legal or Corporate Responsibility Department for guidance.

Providing business gifts or courtesies to government officials, their families or employees is covered by specific rules and regulations that may differ from country to country, state to state and even city to city. Gifts may be prohibited or subject to strict monthly or yearly limitations. They may result in officials having to disqualify themselves from voting on company matters thus impacting the company's ability to do business. Gifts are generally reportable. Prior to making any such contacts, gifts or courtesies, you should review the "Anti-corruption and bribery" section of this Code and contact the Legal or Corporate Responsibility Department.

It is your right to run for elected office, however, if you plan to continue to work for Sempra Energy or one of its subsidiaries, you must be mindful of potential conflict of interest issues, both with your elected position and your job at the Sempra Energy family of companies. Be sure to check with your supervisor and contact the Political Reporting and Compliance Department before you decide to run for elected office.

**Learn More >** *To increase your understanding of these situations; refer to Sempra Energy's Political Activities policy.*

## Q&A

**You meet with a city public official regarding an issue pending before the city. You buy lunch for both the city official and yourself, should you have any concerns?**

*Yes. In every city, state and country where we do business, or are planning to do business, there are strict and complicated laws regulating lobbying and gift-giving. Contact Legal or the Corporate Responsibility Department to be sure you are aware of these regulations and the applicable reporting requirements.*

**We do business in a number of countries where many of the businesses and organizations are run by the state. How do I know if the person I am dealing with is a government official?**

*The term "government official" or "representative" is defined very broadly. You should assume that all employees of city, state and federal organizations or companies and their agents are government officials. Numerous local and national laws apply when the government is involved, so ask your supervisor or Legal for help.*

## Q&A

**I was told that I could hire a consultant to take care of getting all the permits we need from a foreign government. He requested a retainer and said that he would use the money to help move the process along. Since we don't really know where the money is going, do we have to worry about it?**

*Absolutely, you must know where that money is going and for what purpose it is being used. Moreover, Sempra Energy is required to take steps to ensure that this money is not being used as a bribe. You must seek the advice of your supervisor or the Legal Department.*

## Anti-Bribery and Anti-Corruption, Anti-Money Laundering

Sempra Energy prohibits any improper payments to both government and private sector organizations. Improper payments 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 prohibition extends to all employees or agents for our company. Fines, criminal penalties and even jail time may be imposed for violating any applicable anti-bribery and anti-corruption laws and regulations.

Improper payments should not be confused with reasonable and bona fide gifts and business courtesies directly related to the provision, demonstration or explanation of products or services, or the execution or performance of a contract with a government or agency. These gifts and business courtesies are acceptable but may be subject to additional Sempra Energy policies. Some countries, such as Mexico and Chile, impose significant restrictions on gifts to government officials. Therefore, you should contact Legal for guidance prior to dealing with any foreign official.

Background checks and thorough due diligence must be conducted to assess the reputation of entities, agents or consultants that will interact with government officials for honesty integrity and quality when engaging with them. Discuss any proposal or investment that involves a foreign party with Legal.

It is the policy of Sempra Energy to comply with all applicable anti-money laundering and economic sanction laws and to take action to prevent any activity that facilitates money laundering or the funding of terrorist or criminal activities including those programs and sanctions administered by the Office of Foreign Asset Control. As part of this commitment Sempra Energy has adopted an Anti-Money Laundering policy as a matter of best practice.

If you become aware of possible foreign transactions or activities that appear outside the normal scope of business, or that appear unusual or excessive, report them at once to your supervisor, Legal or contact the Ethics & Compliance Helpline or any of the resources listed at the end of this Code.

**Learn More >** *To increase your understanding of these situations, refer to Sempra Energy's Anti-Bribery and Anticorruption policy, and the Economic Sanctions and Anti-Money Laundering policies.*

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## Business Gifts or Courtesies

Exchanging gifts and business courtesies, such as entertainment, meals, recreation or promotional items, can enhance business relationships. However, exchanging these gifts or courtesies can raise serious ethical and legal questions, which could harm or embarrass you and the company. Think about the circumstances with care when dealing with such matters.

Gift or courtesy exchanges should never suggest preferential treatment, such as better prices or favorable terms of sale or contract. Never ask for a gift or courtesy, or accept cash or its equivalent. Don't use your position with the company to solicit vendors to provide preferential personal treatment.

For the most part, you may accept or give a business gift or courtesy under these conditions:

- The gift or courtesy is consistent with accepted business practices and is of customary value, as determined by local or industry practices.
- Public disclosure wouldn't reflect adversely on the company or the people involved.
- The transaction has been disclosed to your supervisor if others could construe the gift or courtesy as more than a mere token.
- Your business unit doesn't have a policy or rule against such activity.
- In some Sempra Energy companies or in some departments, accepting any gift other than low-cost food items or tokens of appreciation is prohibited.

If you're unsure whether a business gift or courtesy is proper, ask your supervisor, Legal, Human Resources, or the Chief Ethics Officer or contact the Ethics & Compliance Helpline.

**Learn More** > To increase your understanding of these situations; refer to Sempra Energy's Business Courtesies – Accepting and Giving Gifts or Gratuities policy.

## Q&A

**How can I figure out when a gift or offer of business entertainment is excessive?**

*You may accept gifts or offers of business-related meals or entertainment only when the value involved is not major and clearly won't place you under any obligation to the donor. Gifts, meals or entertainment that you may offer to others are subject to a similar standard. Your instincts most often will tell you when a gift is too lavish. You should ask yourself both whether the gift is excessive to you personally and whether it would appear excessive to others. In addition to evaluating the lavishness of the gift, you should also avoid giving or receiving gifts too frequently.*

Integrity, Honesty and Respect

# In Our Marketplace

**I** AM  
**FORWARD LOOKING**

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## Fair Competition

Sempra Energy strictly adheres to what are called “fair competition” laws in many countries and “antitrust” laws in others. These are laws that promote or protect fair competition around the world. They assure the preservation of free and competitive commerce. The laws prohibit any agreement among competitors that has the effect of unreasonably restraining trade. All Sempra employees must comply with federal and state antitrust laws and similar laws in any country where we do business. You must not take part in illegal, anti-competitive acts, including agreements to fix prices, manipulate or divide markets, limit production or otherwise unfairly restrict competition.

Along with complying with all fair competition laws, Sempra Energy is a trusted partner by dealing fairly with our customers, suppliers and competitors, and doesn’t take unfair advantage through manipulation or misrepresentation of material facts. Each of us is responsible for maintaining trust. You must make truthful statements about our products or services or those of our competitors. Additionally, Sempra Energy complies with all import and export laws; whether in supply management or buying or selling commodities.

If you are unsure of how the laws apply or become aware of a potential fair competition issue or violation, talk to your supervisor, Legal or contact the Ethics & Compliance Helpline.

**Learn More** > *To increase your understanding of these situations; refer to Sempra Energy’s Antitrust Compliance policy and Guidelines.*



## Q&A

**Can I pretend to be a customer to get pricing information from our competitors?**

*No. Obtaining information about a competitor by misrepresenting your identity or by inducing an employee of the competitor or a third party to divulge confidential information is inappropriate. Gathering information about our competitors is a legitimate business activity when done lawfully and ethically. We certainly do not search through our competitors’ trash or allow others to do so for us. You could find acceptable competitive information by reviewing industry analyst reports, non-confidential customer or supplier intelligence or public information.*

## Q&A

**Some of the laws in my country make it difficult for us to get all the business that is out there and I don't believe all of our competitors are playing by the rules. If our competitors are not following the law, why should we?**

*Our Code and our values are not affected by the actions of others. We must always follow the law and our Code, even if it means that business will be lost.*

## Regulatory Compliance

The Sempra Energy family of companies follows all rules and regulations set by local, state and federal authorities in all countries where we do business. As employees, it's our responsibility to know the laws, rules and regulations that apply to our jobs. Non-compliance or any violation of these regulations can expose the company and you as an employee to substantial penalties, criminal punishment and business restrictions.

Sempra Energy employees based in the United States and foreign subsidiary employees working in the United States must comply with the Federal Energy Regulatory Commission (FERC), the Commodity Futures Trading Commission (CFTC), and the California Public Utilities Commission (CPUC) regulations, and rules of other regulatory bodies where applicable, such as the California Energy Commission and the Pipeline and Hazardous Materials Safety Administration (PHMSA). All employees, especially those performing shared-service functions, must take care to avoid sharing prohibited information between departments and affiliates (anti-conduit rules). You should always use prudence when communicating in common areas, such as hallways, cafeterias and elevators or when sending emails.

**Learn More >** *To increase your understanding of these situations; refer to Sempra Energy's Affiliate Compliance policy and the Affiliate Compliance website.*



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## Conflicts of Interest

A conflict of interest arises in any situation where there is a potential for divided loyalties between your personal interests and your obligations to the company. You must make all of your work decisions based on the best interests of the company and not on personal interests. To avoid reputational and other unforeseen harm to both you and the company, you must avoid any activity that involves even the appearance of a conflict of interest.

Pay special attention to potential conflicts with customers, suppliers and competitors. A conflict of interest may arise, for instance, if a family member or former employee works for or has a major financial interest in one of the company's customers, suppliers or competitors. Never forget that even the appearance of bias is to be avoided.

You may not accept business opportunities, commissions or discounts from others because of your position with the company and cannot use others to do indirectly what you're not allowed to do yourself.

If you intend to engage in any other business or gainful employment outside of your work with the company you are urged to inform your supervisor or Human Resources department. They can assist you with ensuring that your outside activities don't constitute a conflict with the company's concerns.

Finally, Sempra Energy doesn't want to interfere with your activities when you're not working. The company has an interest, however, if you conduct yourself in a way that damages the reputation of the company, negatively affects your performance or creates a conflict of interest.

**Learn More >** *To increase your understanding of these situations, refer to Sempra Energy's Conflicts of Interest, and Employment Eligibility & Hiring of Relatives policies for United States and International employees.*

## Q&A

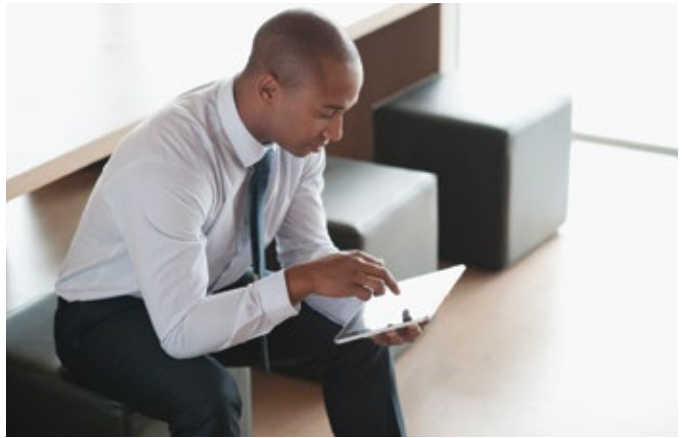
**I was invited to an industry conference by a supplier who has offered to pay all expenses including travel. The purpose of the conference is to demonstrate the supplier's new line of software. May I attend this conference?**

*If there is a business purpose and a benefit to the company, attendance may be permitted; however, the company should pay all expenses. You must avoid the appearance of any conflict of interest and never put yourself in a position of being obligated to any particular vendor. Check with your supervisor for guidance.*

## Q&A

**My supervisor circulates a weekly trade journal to our department. Am I allowed to photocopy relevant stories from these journals?**

*The subscription comes with certain copyright restrictions. Check with your supervisor to understand whether or not photocopies are allowed or if there are other ways for you to use this information. If the journal is under the agreement of the Copyright Clearance Center, Sempra Energy's license may cover it. Check by clicking the "Ethics and Compliance" link in the Contents Directory section in SempraNet and then click on "Use of Copyrighted Material".*



## Intellectual Property

Intellectual property refers to our company's knowledge and ideas, which are protected by law. This means items such as copyrights, patents, trademarks, design rights, logos, trade secrets and brands. The law protects Sempra Energy's ownership and other interests in this type of property just as it protects ownership of physical property rights.

Sempra Energy also recognizes and respects the intellectual property rights of others. You may not use intellectual property or acquire confidential or proprietary information about other companies or individuals through improper means, such as deceit or misrepresentation.

Take care in your use of copyright-protected materials. Copying or improperly using or distributing copyrighted work without the owner's permission is called copyright infringement. Copyrighted work can include material downloaded from the internet – including clipart, artwork, photos, music and videos, as well as computer software. Creating unauthorized copies of copyrighted material may result in violations subject to civil and/or criminal penalties.

To reuse copyrighted material, you must obtain permission from the owner. Sempra Energy has agreements with various license boards that provide permission for business use of others' copyrighted materials (e.g., published media,

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video/audio and music). You should always check before using other's material using the resources and guidelines identified below.

The guidelines and membership information for these rights can be found on SempraNet; click on the "Ethics and Compliance" link found on the right side of the page and then click on "Use of Copyrighted Material".

**Learn More >** *To increase your understanding of these situations, refer to Sempra Energy's Use of Copyrighted Materials policy or visit the Use of Copyrighted Material website on SempraNet.*





Integrity, Honesty and Respect

**For Our Shareholders**

**I AM**  
**HIGH PERFORMING**

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## Financial Records

The integrity of the company's financial records is crucial to our operations and to maintaining the confidence and trust of our employees, shareholders and other stakeholders. Our financial records are particularly important because they provide the support underlying the quantitative and qualitative aspects of the Company's disclosures in financial statements and other financial information. In addition, the integrity of the company's financial records is an integral part of our internal control structure. In other words, both what we do (financial reporting) and the way we do it (internal control framework) are fundamental to our success. All transactions must be properly recorded, classified and summarized in accordance with Sempra Energy's accounting policies, which comply with applicable authoritative accounting and financial reporting rules, applicable laws and regulations.

Finance and accounting officers and personnel have a fiduciary responsibility to help ensure that finance and accounting practices and financial statement disclosures provide full, fair, accurate, timely and understandable information about the company's financial results and condition.

Everyone is responsible, however, for recording clear, accurate and honest information on all of the company records they produce or maintain, including as applicable, journal entries, executed agreements, financial reports, expense reports, time sheets and other documents. If you're not sure about the proper way to record or document a transaction, contact your business unit's Accounting Department or controller.

If you feel you're being asked to create a document or to record a transaction in a less-than-honest and/or an inaccurate manner, report it at once to your supervisor, business unit controller or contact the Ethics & Compliance Helpline.

**Learn More >** *To increase your understanding of these situations, refer to the Financial and Accounting policies on the "Index of Sempra Energy Corporate Policies."*

## Q&A

**Last week, I helped out a vacationing co-worker by recording a business transaction. I had several questions about the way the deal was done, and even though my supervisor couldn't answer my questions, she assured me that it was all perfectly legitimate. What should I do if this happens again?**

*It's your responsibility to understand every transaction you record, because you may need to answer questions about its accuracy. Discuss any concerns or questions you may have about a transaction, including any concerns about the integrity of a transaction, with your supervisor. If your questions aren't answered satisfactorily, speak to a higher level of management or contact the Ethics & Compliance Helpline.*

## Q&A

**I believe that I was asked to prepare a record that misrepresents or hides a situation that is not in compliance with our stated policies. What should I do?**

*Never prepare false records. As quickly as possible, bring the situation to the attention of your supervisor, Human Resources or contact the Ethics & Compliance Helpline. Falsifying company records is not allowed and could result in disciplinary action, up to and including termination of employment, as well as legal action against the company or you personally.*

## Internal Business Controls

Sempra Energy's internal business controls are designed to guard against the fraudulent handling of money, company assets, documents or other areas covered in these standards.

You have a responsibility to understand and adhere to the company's internal business controls and all associated policies and procedures. If you witness any internal business controls being bypassed or ignored, or if you have concerns about their effectiveness, report the situation to your supervisor, business unit controller or contact the Ethics & Compliance Helpline.

**Learn More >** *To increase your understanding of these situations, refer to Sempra Energy's Internal Control, Approval & Commitment, Employee Business Expense, and Travel policies.*

## Company Assets

We all have a responsibility to protect our company's assets. This includes technology, confidential or proprietary information, cash, and physical assets, and because reputation is the currency of our connected world, we all have a duty to protect Sempra Energy's reputation. Theft, malicious behavior, carelessness and waste can directly impact our company's financial and reputational success so we must all:

- Follow applicable policies and procedures whenever acquiring or handling company assets,
- Protect physical assets in a manner that prevents theft or malicious use of property such as laptops, smartphones, and similar devices,
- Use company information, property and time only for legal and ethical business purposes and:
- Dispose of assets in an appropriate manner and with proper approval.

Our company provides technology and devices to facilitate company business - limited, occasional personal use of these resources is acceptable provided it is not excessive, does not interfere with your work duties and is in line with all applicable laws, regulations and company policies.

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Use of company assets, including vehicles, construction equipment, tools and company information should be limited to company purposes unless you have obtained specific company approval for other use.

The Company also reserves the right to track and monitor activity using its systems, including when those systems are accessed by a personal device. Additionally, the Company reserves the right to access company documents and information that may be located on personal devices, whether or not those personal devices are on company property. Employees relinquish their expectation of privacy in their personal devices by operating them on company systems and/or accessing or storing company information on them.

All logos and trademarks of the Sempra Energy family of companies' brand represent our business and our reputation worldwide. We protect these assets in a variety of ways, and must always respect the special value they provide our company. For example, Sempra Energy and its subsidiaries are often asked to provide our name or logo for sponsored events, marketing promotions or commercial ventures. We participate in these arrangements only after careful consideration.

**Learn More** > To increase your understanding of these situations, refer to Sempra Energy's Approval & Commitment, Employee Business Expense, Travel, Use of the Company Name and Logo, and Information Technology Acceptable Use policies.



## Q&A

**I use a laptop for work; what can I do to help prevent the risk of data or information thefts?**

*You should never let your laptop out of your sight in a public location, never check it with your luggage when traveling and keep an eye on it when going through airport security. If you need to put your laptop down, try to put it in front of you. You should never leave your laptop in a vehicle, but if you do, you must lock it in the trunk and out of sight. When staying in a hotel, lock your laptop in the room safe or take it with you, never leave a laptop or any other electronic device unsecured in the room when you're not there.*

## Q&A

**I am working on an engineering project that will help our company increase its efficiency. I have a friend who is working on a similar project at another company. If my friend and I compare notes, we'll come up with a better solution. I explain some of the details of my project on my friend's Facebook page, where we discuss some of the challenges of the project. Have I done anything wrong?**

*Yes. Even though your project is still a work in progress, sharing it with your friend, and over social media, reveals confidential company information that could put the company at a disadvantage. You should delete the post immediately and notify your supervisor that confidential information has been disclosed.*

## Media Relations and Online/Social Media

All members of the Sempra Energy family of companies must speak with a consistent, clear voice to the media and other outside stakeholders. In order to ensure this consistency, each business unit has designated spokespeople. If your role within your business unit does not specifically involve responding to media or other outside inquiries, you may not make any statements on the company's behalf.

If you receive media or third-party inquiries from investors, regulators or others, rather than respond yourself, you should immediately forward the request to your business unit's External Affairs department. Always keep in mind that only those authorized to speak with financial analysts or members of the media should respond to inquiries from these groups.

Internet and other social media postings about a Sempra Energy company are allowed, subject to the guidelines outlined below. Social media communications include, but are not limited to, posts to social networking websites (Facebook, LinkedIn, etc.), blogs, micro-blogs (Twitter, Instagram, etc.), multimedia websites (YouTube, etc.), Wikis or any other website where content can be posted.

Official company postings are permitted only by communications staff or other employees who have been pre-approved by communications staff. If an employee belongs to a professional organization related to their job function and that organization utilizes social media, the employee can participate, subject to approval by their supervisor.

Employees should use common sense with all postings, are responsible for the content of their posts and should be mindful of how the postings could impact the company. Please follow these guidelines:

- Don't share non-public information,
- Don't misrepresent yourself,
- If posting about company products/services, clearly disclose your relationship to the company and state that you are not representing the company's views,
- If you identify yourself as an employee of Sempra Energy or one of its subsidiaries in a posting not sponsored by the company, you must include the following disclaimer: "The views expressed in this post are mine and do not necessarily reflect the views of my company."

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- Don't post anything that could be considered defamatory, threatening or an invasion of privacy and;
- Don't use derogatory remarks, obscenities or colorful language.

**Learn More** > To increase your understanding of these situations refer to Sempra Energy's Insider Trading and Information Confidentiality, Information Security and Media Relations policies.

## Information Management

Sempra Energy's business information is a high value asset. To maximize that value, it is important that we all play a part in retaining, protecting and optimizing the company's information.

- **Retaining:** The demands of business today require that you manage your work-related information appropriately. This includes organizing, protecting and preserving content, as well as disposing of information based on your department's retention requirements.
- **Protecting:** Security and integrity of the company's information is also important. You must protect business information from getting into the wrong hands and help ensure that it is reliable.
- **Optimizing:** Last, but not least, information that is well managed enhances Sempra's effectiveness. You can contribute by making sure the right information is easy to find and available to the right people at the right time. This includes appropriately disposing of information when it is no longer needed by a legal hold order, or beyond the records retention requirements, or no longer has business value.

When directed by Legal, you may need to keep certain information, even if it has reached its expiration or destruction date. This could happen if the content is needed for a legal, government or internal investigation. Such direction may be referred to as a "hold order". Hold orders, and related information about them are listed on SempraNet, under "Litigation Hold Orders" found on the Information Management website.

**Learn More** > To increase your understanding of these situations, refer to Sempra Energy's Information Management, Legal Hold and Records Preservation, and Information Security policies.

## Q&A

**My supervisor has asked me to shred documents related to a project handled by my department. Is this a proper request?**

*The disposal of documents in the ordinary course of business is permissible if done in accordance with the company's Information Management policy and if there is no Hold Order in place for these documents. If you are uncertain whether these documents may be disposed of, you should check with your Information Coordinator, the Information Manager for your business unit or Legal. You can also consult the Sempra Energy Records Retention Schedules on the Information Management intranet site on SempraNet.*

*If you believe this request is potentially wrong, you should contact Legal, Human Resources or the Ethics & Compliance Helpline.*

## Q&A

**My friends often ask me about the company and if they should buy stock in it. Can I tell them how the company is performing and recommend that they buy the stock?**

*As long as you don't provide material, non-public information or make recommendations based on insider information, it is up to you if you want to recommend buying our stock. Keep in mind that it is sometimes difficult to distinguish between what is or is not material information.*

## Securities Trading

It is illegal to buy or sell securities using material, nonpublic information, also referred to as inside information. We're not allowed to buy or sell company securities (or the securities of another company) using material, nonpublic information. Information is considered "public" after a widely circulated public announcement of the information, such as national newswire services, or if the information is in a document filed with the SEC such as an annual or quarterly report, a form 8-K or a prospectus. Generally, information is "material" if a reasonable investor would consider it important in making an investment decision.

Insider trading violates company policy and insider trading laws that impose substantial civil and criminal penalties. The laws also prohibit providing inside information to others to assist them in their trading or making recommendations to others to buy or sell. Inside information need not be about Sempra Energy and can be about any company.

Insider trading prohibitions generally don't apply to ongoing purchases under employee savings or dividend-reinvestment plans, such as 401(k) retirement plans or vesting of restricted shares. They do, however, apply to increases, decreases or transfers of your savings plan investments in company stock, purchases and sales of company stock, and exercises of stock options involving a sale of company stock (such as exercises through broker assisted cashless exercises).

In addition to prohibiting insider trading, Sempra Energy policies prohibit you from trading in puts, calls, options warrants or similar instruments or derivative securities relating to securities of any Sempra Energy family of companies' stock, because of the speculative nature of such transactions. You are also prohibited from selling "short" any securities of these companies.

**Learn More >** *To increase your understanding of these situations; refer to Sempra Energy's Insider Trading and Information Confidentiality policy.*

## Resources for More Information and Help

Along with your supervisor or next level of management, you may refer to or contact any of these resources for advice or information:

**Sempra Energy's Chief Ethics Officer:** (619) 696-4537, [Ethics@sempra.com](mailto:Ethics@sempra.com)

### **Ethics & Compliance Helpline available 24/7:**

- Report online at [SempraEthics.com](http://SempraEthics.com)  
Or call the following:
- United States: (800) 241-5689
- Mexico: 001-770-582-5249
- Chile: 600-320-1700
- Peru: 0800-7-0690

### **Human Resources:**

- Corporate Center: (619) 696-2486
- SoCalGas: (213) 244-3369
- SDG&E: (858) 637-7924
- USG&P: (619) 696-4206
- SLNG&M: (619) 696-2399
- SI: (619) 696-4249

### **Security:**

- United States: (619) 725-8611
- Mexico: 52 559 138 0122
- Chile: 56 32 245 2893
- Peru: 99 358 8877

### **Ethics and Compliance Intranet Site:**

Click "Ethics and Compliance" under the SempraNet contents section

### **Corporate Policies Intranet Site:**

Highlight "Policies and Forms in the banner on SempraNet and then click on "Index of Sempra Energy Corporate Policies"

For policies relating to your specific business unit, please reference your business unit intranet site or ask your supervisor for guidance

**Corporate Responsibility:** [CorporateResponsibility@sempra.com](mailto:CorporateResponsibility@sempra.com)

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**SempraEthics.com**

**U.S. contact: (800) 241-5689**

**Mexico contact: 001-770-582-5249**

**Chile contact: 600-320-1700**

**Peru contact: 0800-7-0690**

