



## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

**Responsible Officer:** Executive Vice President and General Counsel

**Applicability:** All employees of Sempra Energy and its business units

### **Policy Statement**

Sempra Energy's core values include acting in an ethical manner when conducting business. Across all of our businesses, we are committed to conducting 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 Sempra Energy Companies as well as anyone authorized to conduct business on behalf of the Sempra Energy Companies shall comply with all applicable anti-corruption and anti-bribery laws, as well as this Policy.

***Sempra Energy 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 Sempra Energy and the Sempra Energy Companies. Good faith efforts shall be made to ensure that other affiliated companies adopt a policy or follow practices consistent with this policy. Sempra Energy also requires Third Party Representatives to act in a manner that is consistent with Company policy.

### **Books and Records**

To prevent the concealment of any bribes and comply with relevant laws this policy requires that all of Sempra Energy 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 Sempra Energy 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 Energy 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 Legal and Compliance Department or to the Ethics Helpline, available 24 hours a day, seven days a week. Every call and email received is investigated. 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 Legal and Compliance 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-corruption and anti-bribery 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-corruption and anti-bribery training and certifications, which are provided on a periodic basis.