



**CODE OF BUSINESS CONDUCT**

SHARING  
RESPONSIBILITY  
IN OUR GREATER  
PURPOSE

# OUR VALUES

Our core values define who we are collectively while guiding us individually in our work.

## **DO THE RIGHT THING**

We are guided by our ethics, our focus on safety and our willingness to stand up for what is right.

## **CHAMPION PEOPLE**

We invest in people and value diversity and inclusion because it elevates performance and helps us partner responsibly.

## **SHAPE THE FUTURE**

We are forward thinkers who innovate and collaborate with stakeholders to make a positive difference.

## A MESSAGE FROM

# Sempra Energy's Chairman and CEO

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Dear Colleagues:

Together, we serve the most attractive markets in North America – California, Texas and Mexico. We are also building a premier leadership position in the LNG export market, starting with the commencement of operations at the Cameron LNG facility in Louisiana. As we work to support our customers in new and better ways, it is our responsibility to ensure we are always being thoughtful and making the right decisions for all our stakeholders.

Sempra's Code of Business Conduct serves as our foundation for ethical decision making. It starts with our values – *do the right thing, champion people and shape the future*.

Should you become aware of an unsafe or unethical situation, I am calling on each of you to do the right thing. Speak with your supervisor, reach out to one of the contacts listed in the Code of Business Conduct or call our Ethics & Compliance Helpline. We will not tolerate retaliation against any employee who, in good faith, raises and reports a concern.

We all come to work each day inspired to achieve our vision of delivering energy with purpose. Great things are possible when we work together toward a common mission – thank you for doing your part.

Ever forward together,



Jeff Martin  
Chairman and Chief Executive Officer  
Sempra Energy





The Ethics & Compliance Helpline is available globally 24 hours a day, seven days a week.  
United States: (800) 793-7723 Mexico: 001-770-582-5249 [SempraEthics.com](https://www.SempraEthics.com)



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Note: Our corporate policies can be found on [SempraNet](#). 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 man and a woman are smiling and looking at a tablet together. The man is on the left, wearing a dark sweater over a light blue shirt. The woman is on the right, wearing a dark blazer over a light blue shirt. They are both looking at a tablet held by the woman. The background is blurred. The entire image has a blue tint.

**LIVING OUR CODE**

A commitment of  
integrity, honesty and  
respect, every day

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## BUSINESS CONDUCT

# A Personal Responsibility

Do the right thing is one of our core values. The Company's *Code of Business Conduct* ("Code") is our guide for maintaining a workplace that follows legal and ethical standards based on two fundamental principles:

- We conduct business in compliance with international, federal, state and local laws and regulations.
- We follow the Company's values and ethical standards.

Our Code applies to all Company employees ("Company employee"). Laws may vary from state to state or country to country but acting ethically and legally does not vary. Here "Company" refers inclusively to Sempra Energy and/or a subsidiary or other entity as to which Sempra Energy has majority ownership and control.

Our Code provides employees with information, support and resources to help ensure we take personal responsibility for our business conduct. **All Company employees are responsible for reading and following the Code and asking questions if something is not clear.**

### **As a Company employee, I will:**

- Follow all applicable laws, regulations and Company policies;
- Conduct myself in a way that does not damage the Company's reputation;
- Be alert and sensitive to situations that could be illegal, unethical, and improper or in violation of this Code or our policies; and
- Report actual or suspected violations of our Code or Company policies.

From time to time employees 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 employment termination.

Those with leadership roles within the Company have added responsibilities.

### **As a Company leader, I will:**

- Ensure that the people who report to me 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.

## 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 okay?**

*Yes, we have an open-door policy where employees are encouraged to discuss issues directly 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.*

## MAKING ETHICAL DECISIONS AND REPORTING CONCERNS

### 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 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 on the next page, the Company strictly prohibits retaliation.*

Keep in mind our Code cannot cover every situation that might arise on the job. Instead, its guidance and examples describe expected behaviors and methods of ethical decision making. As Company employees, we are obligated to bring any known or perceived violation of our Code or the law to the attention of appropriate Company resources.

#### **As a Company employee, I will:**

- Ask myself the following questions if faced with an uncertain situation in my workplace:
  - Which course of action is legal and within Company policy?
  - Which decision is fair, honest, appropriate and consistent with our ethical values?
  - Has the situation been discussed with the appropriate person?
- Raise concerns and ask questions to protect myself, my co-workers and the Company; and
- Report immediately any known or possible violation to:
  - My supervisor or the next level of management
  - Human Resources department
  - Sempra Energy's Chief Ethics Officer – [Ethics@sempra.com](mailto:Ethics@sempra.com)
  - The Ethics & Compliance Helpline –
    - Website – [SempraEthics.com](https://www.sempraethics.com)
    - Email – [EthicsHelpline@sempra.com](mailto:EthicsHelpline@sempra.com)
    - In the U.S. call: 800-793-7723
    - In Mexico call: 001-770-582-5249

**Whether you call or use the online reporting website, the Ethics & Compliance Helpline is available globally 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, and appropriate action is taken.



## RETALIATION IS NOT TOLERATED

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Any employee, who in good faith, seeks advice, raises a concern or reports violations is both following this Code and doing the right thing. We support employees who do the right thing and will not tolerate retaliation.

### **As a Company employee, I will:**

- Report in good faith all information I believe to be true; and
- Treat others with respect even if they have made a complaint or participated in an investigation.

### **As a Company employee, I will not:**

- Retaliate against an employee.

Retaliation can take many forms, such as being treated differently, but generally includes any negative action taken against someone for raising a concern or reporting misconduct. Claims of retaliation are taken seriously with all being investigated and appropriate action taken. Anyone found responsible for retaliating against an employee is subject to disciplinary action, up to and including employment termination.

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

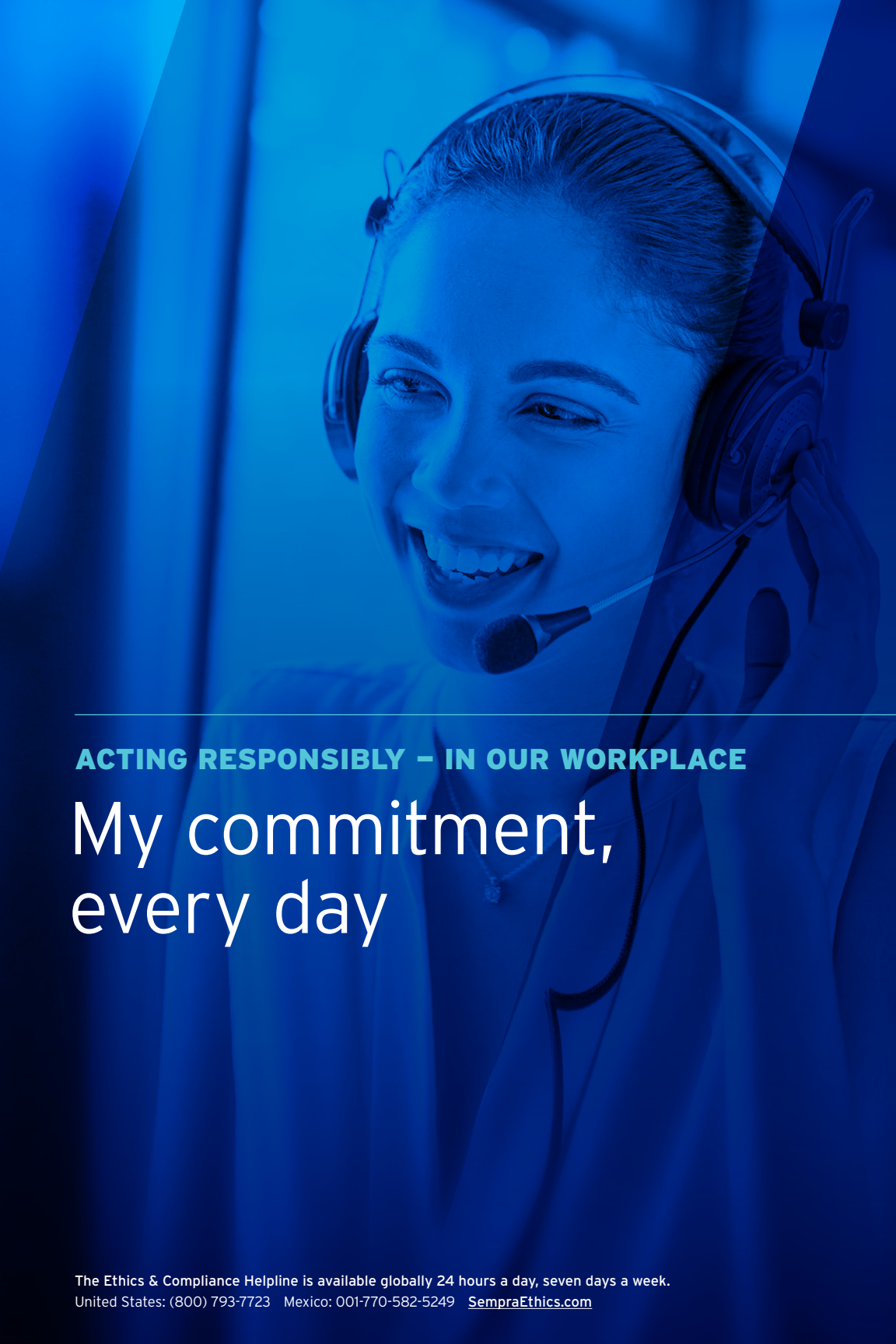
**Learn more >** [Refer to the \*Ethics & Compliance – Reporting and Investigating Concerns\* policy.](#)

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## Q&A

**I got along well with my co-workers until I called the Helpline with a complaint that our supervisor was underpaying me. Some of my co-workers were interviewed during the investigation, and after it was concluded, they began giving me the cold shoulder and stopped inviting me to team gatherings. What should I do?**

*You should speak with someone about your concerns as your co-workers' behavior towards you may violate our no retaliation policy. You can speak with your supervisor or another member of management in your organization, Human Resources, or the Ethics & Compliance Helpline. All employees are encouraged to make good faith complaints without fear of retaliation.*



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**ACTING RESPONSIBLY – IN OUR WORKPLACE**

My commitment,  
every day

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## SAFETY MATTERS

# Everywhere, Every Day

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Working safely every day is our highest priority. This means providing a safe work environment for everyone: employees, contractors, customers and the public. Safety is front and center in 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.

### As a Company employee, I will:

- Comply with all applicable international, federal, state and local health-and-safety laws and regulations;
- Never compromise safety; and
- Be aware that no activity is so important that it should put in danger any employee, contractor, customer or public safety.

If you see a potential safety problem or violation, or if you have questions, first discuss them with your supervisor. If you are unable to do so or you are unsatisfied with your supervisor's explanation, raise your concern with higher levels of management or contact any of the resources listed at the end of this Code. You have a right and an obligation to stop any job when an unsafe situation arises.

**Learn more >** Refer to the [Safety policy](#).

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## Q&A

**What should I do if I see a co-worker without his personal protection equipment (PPE) while I'm at work?**

*We have no higher priority than safety, so stop the job until any and all safety issues are resolved. If you see a co-worker working without PPE, point out the risk and request that he or she work safely as we all share the responsibility to foster an injury-free workplace.*

### Q&A

**My co-worker is very knowledgeable technically but lacks people skills. He shows up late to meetings, talks over others, rolls his eyes when I speak, and stares at his phone when others are speaking. I learned he is going to be promoted and I will have to report to him. I'm afraid that if I say anything, my supervisor will think I'm just jealous of my co-worker's promotion. What can I do?**

*You should raise your concerns about this individual's failure to treat others with respect. If you do not feel comfortable speaking with your supervisor, you can go to Human Resources or 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 in good faith because our leaders need to know about possible issues to have the chance to solve them quickly. We are committed to ensuring a respectful and professional work environment for all employees.*

We are 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 including HIV and AIDS, cancer, genetic characteristics, marital status, gender, sexual orientation, gender identity or expression, age, pregnancy, childbirth, or related medical conditions, family and medical care leave, military status, political affiliation, or any other characteristic protected by law.

#### **As a Company employee, I will:**

- Treat co-workers, customers, suppliers and contractors with respect, fairness and dignity.

#### **As a Company employee, I will not:**

- Make comments or jokes, post or share pictures, or engage in behaviors that are offensive or discriminatory in any way;
- Bully, or engage in any unwelcome or unreasonable behavior that degrades, intimidates or humiliates employees either as individuals or as a group; nor
- 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 immediately investigate all reported incidents and take proper action without retaliation.

**Learn more >** Please refer to the [Discrimination & Harassment Free Workplace policy](#).



## VIOLENCE IN THE WORKPLACE

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We are committed to maintaining a work environment free from violence, threats, aggression or intimidation.

### **As a Company employee, I will:**

- Report anyone who is behaving in an intimidating manner or speaking in a violent or threatening way.

### **As a Company employee, I will not:**

- Bring any weapon, including firearms, explosives or bullets to the workplace, except for 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;
- Threaten or create a real or potential hazard for employees or others;
- Make violent physical contact or actions, violent verbal or written statements, or threats of violence against employees or their families; nor
- Harass, stalk or take any action that creates a real or perceived threat.

Any employee who acts violently or makes threats affecting the workplace is subject to disciplinary action, up to and including employment termination. 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 does not appear as an immediate danger, you should promptly report it to Corporate Security:

- U.S.: (619) 725-8611
- Mexico: 001-619-725-8611

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

**Learn more >** Refer to the [Physical Security](#), and [Violence in the Workplace](#) policies.

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## Q&A

**A co-worker has been visibly agitated at work over the last week. I don't know if he's having personal problems at home or if something else is causing it, but I'm concerned it will get worse. How do I handle this?**

*If you ever feel threatened or in danger, do not hesitate to speak up. You should discuss the situation with your supervisor, Corporate Security, Human Resources, the Chief Ethics Officer, the Ethics & Compliance Helpline or any of the resources listed at the end of this Code.*

## SUBSTANCE ABUSE

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### Q&A

**I'm taking prescription medication that could inhibit my ability to work, but I don't want to reveal my medical condition to my supervisor. Do I have to report the medication that I'm taking and why to my supervisor?**

*You are not required to tell your supervisor the type of medication you are taking or why you are taking it. However, you are obligated to inform your supervisor about the effects of any medication that you and your physician believe could impact your ability to perform your job (i.e., inability to drive or operate heavy machinery, drowsiness). After you share this with your supervisor, Human Resources/Employee Care Services may ask for clarifying information and to work together to determine whether you are able to perform the essential functions of your job safely and efficiently or whether you require reasonable accommodation.*

Substance abuse in the workplace poses risks to the health and safety of all employees, customers and the public. We are firmly committed to providing employees a safe and efficient workplace that is drug and alcohol-free. We are also committed to following all local, state and federal regulations about abuse of controlled substances and/or alcohol.

#### **As a Company employee, I will:**

- Report to work in a sober and capable condition to perform my job correctly in a safe and efficient manner.

#### **As a Company employee, I will not:**

- Come to work in a condition unfit to perform my job and work safely due to the use of drugs or alcohol;
- Possess illegal or prohibited drugs during working hours or on company property; nor
- Refuse to consent to any legal testing.

All conduct of this manner is prohibited and could lead to discipline up to and including termination of employment.

The Company's Substance Abuse and 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 applicable regulations.

We offer access to and encourage the use of our Employee Assistance Program, which provides confidential counseling and other assistance to full-time employees and their families.

**Learn more >** Refer to the [Substance Abuse Testing and Reasonable Accommodation of Persons with Disabilities policies](#).

## CONFIDENTIAL INFORMATION

# Protecting Privacy

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As Company employees, we are obligated to protect any confidential information we learn or encounter in our workplace. A few examples of confidential information are: employee or customer personal data (such as name, address or government-issued identification number), technical information, customer lists, terms, conditions, rates or fees offered to customers, pricing policies, budgets, marketing and strategic plans, and intellectual property.

Our Company respects the privacy of every employee and customer and collects and retains private, personal information only as required by law or for us to operate effectively. We must protect personal employee, business partner and customer information, limiting access and usage only to authorized personnel and only for appropriate business purposes.

### **As a Company employee, I will:**

- Take care not to unintentionally share or lose files or devices containing confidential information; and
- Be mindful of what information I discuss, and where I discuss it, to ensure confidential information is not overheard.

### **As a Company employee, I will not:**

- Take confidential documents if terminating employment with the Company, unless my supervisor and the Human Resources department specifically grant approval; nor
- Use confidential information belonging to another company in violation of any obligations I may have to that company.

You always have the right to go to government entities or agencies to report something that you believe violates the law. If making such a report requires that you disclose confidential information, you are permitted to only disclose as much as is necessary to make the report, and only to those directly involved in the reporting. Our Company will not retaliate against you for making such a disclosure in good faith.

**Learn more >** [Refer to the Confidentiality, Fair Disclosure, Privacy, and Information Security and Acceptable Use policies.](#)

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## **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 and only discuss it with those who need to know for 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 or in the conference room and do not throw them away.*

## CYBERSECURITY

### Being Vigilant Online

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#### Q&A

**I received an email from my supervisor requesting my username and password. What should I do?**

*Do not provide your username and password to anyone, including your supervisor. Check to see if the email truly came from your supervisor and if necessary, report it to your Information Security department.*

Cybersecurity should always be top of mind.

Email phishing is one of the top methods used by criminals to trick you into sharing personal, financial or other confidential information. Phishing emails often contain links to websites that are infected with malware. Typical phishing emails appear to come from popular social websites, auction sites, banks, online payment processors or a company's Information Technology department. These emails (or texts) may come from an unknown source or may look like it is from someone you know. A phishing email will always ask you to take an action.

Criminals use a method called "social engineering" to make an email appear familiar or legitimate. They rely on a person not paying close attention and then clicking a link, opening an attachment or providing personal or company information, without thoroughly thinking it through. One type of phishing email fraud targeted for financial gain is known as **"Business Email Compromise"** (BEC). In a BEC attack, a criminal impersonates one of the parties in a financial transaction which could result in an employee sending a payment to a criminal's designated account, instead of to a valid supplier or customer account.

While the Company has strong systems in place that identify and prevent most of these malicious or unwanted email messages and attacks, they don't catch all, nor do they provide protections when checking personal email on a Company device. Online criminals hope to catch an employee who is not paying attention and trick that person into taking an action that could put the Company at risk.

#### **As a Company employee, I will:**

- Slowly and carefully review all aspects of an email message;
- Not let a sense of urgency cause an impulsive action;
- Verify that the sender's email address is a recognized sender;
- Check hyperlinks before clicking by asking myself if the link redirects to an unrecognized URL or website; and
- Review the content of the entire email to ensure it is an expected email while considering tone and grammar.

#### **As a Company employee, I will not:**

- Click any unfamiliar links or open any unrecognized or unwanted attachments;
- Forward suspicious or unclear email messages to friends or colleagues; nor
- Provide Sempra login credentials or any other personal or Company information.

**Learn more >** Refer to the [Information Security and Acceptable Use policy](#).





**BEING A ROLE MODEL – IN OUR COMMUNITIES**

My commitment,  
every day

## ENVIRONMENTAL PROTECTION

# Committed To Our Bright Future

### Q&A

**We had a small spill recently that we took care of quickly, but I don't think anyone notified management because no one wanted the paperwork, aggravation or possible expense of a government fine. What's our Company's policy on this?**

*We 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; the health and safety of our employees, contractors or members of the public, or our reputation must also be reported to your supervisor in accordance with Company policy.*

We are committed to protecting and conserving the environment and we each play a role in delivering on our community promise.

Environmental protection laws, regulations and reporting requirements affect nearly all aspects of our business. We comply with all such laws, whether they are international, federal, state or local. Our environmental compliance programs include detailed plans; extensive training and monitoring; and performance evaluation and certification. We proactively search for opportunities to perform beyond current environmental standards.

#### **As a Company employee, I will:**

- Be responsible for understanding the impact of my work on the environment and knowing the specific environmental protection requirements for my job;
- Comply with all laws, regulations and company policies; and
- Report incidents, spills, releases of material to the environment, potential problems or violations to my supervisor, the Legal department or contact the Ethics & Compliance Helpline so that steps can be taken immediately to control or correct the situation.

#### **As a Company employee, I will not:**

- Continue with any work that becomes unsafe or unhealthy due to an environmental spill or incident; nor
- Assume someone else will report a risk or concern.

**Learn more >** Refer to the [Environmental, Biodiversity and Water policies](#).

## HUMAN RIGHTS

# Everyone's Rights

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We believe in the dignity, human rights and personal aspirations of all people. This belief is foundational to our Code and to our longstanding commitment to diversity and inclusion.

### As a Company employee, I will:

- Be a strong community partner - forming positive relationships wherever we do business;
- Be mindful that individuals from certain groups or populations, including indigenous peoples, may be at greater risk of marginalization;
- Work to avoid causing or contributing to human rights violations;
- Value and respect human rights across our operations and conduct business in a way that minimizes the negative effects our infrastructure or operations may have on people and communities, where possible, independent of what governments may or may not require; and
- Report any concerns or violations to my supervisor, the Legal or Corporate Citizenship department or to the Ethics & Compliance Helpline.

### As a Company employee, I will not:

- Use, or permit to be used, forced or trafficked labor; nor
- Use child labor (individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is higher).

**Learn more >** Refer to the Human Rights and Stakeholder Engagement policies.

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### Q&A

**I learned that one of our construction contractors may be employing children who aren't technically old enough to work. What should I do?**

*We do not tolerate the use of child labor in our operations or via our contractors. Laws concerning the legal age to work may vary by country and by type of work. For assistance, contact your supervisor or the additional resources listed in this Code.*

## CHARITABLE ACTIVITIES

### Serving Others

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#### Q&A

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

*We typically limit in-kind donations and all donations require prior approval. Contact the community relations representative at your company to determine if the donation is appropriate. If so, coordinate with the appropriate departments to ensure this is done within our guidelines.*

We're proud of our long-standing commitment to the communities where we live and work. We consistently strengthen our commitment 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.

#### **As a Company employee, I will:**

- Ensure that charitable contributions or corporate memberships made on behalf of the Company are in the Company's best interest; and
- Request review from my community relations representative of 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.

#### **As a Company employee, I will not:**

- Commit the Company to any of the following without first obtaining authorization and approval:
  - Financial gifts
  - Donations
  - Sponsorship
  - Underwriting
  - Membership payments
  - In-kind gifts to help charitable, civic or community groups

**Learn more >** Refer to the [Contributions policy](#) or the [Employee Giving Programs](#), [Sempra Energy Foundation](#) and [Sempra Energy Giving Network](#).



## POLITICAL ENGAGEMENT

# Collaborating Effectively

We consider engaging with policymakers to be an important, necessary and appropriate part of doing business—if it is conducted in a legal and transparent manner.

We contribute to the campaigns of political candidates, political parties and ballot measures in the U.S. as permitted by law. We do not make political contributions outside the U.S.

### As a Company employee, I will:

- Be trained in political reporting and compliance obligations if any aspect of my position or work interfaces with local, state or federal government officials or personnel;
- Check with my supervisor and contact the Political Reporting and Compliance department for specific guidance before deciding to run for elected office or considering an invitation to serve in an appointed position;
- Obtain advance approval to hire former government officials who will be representing the Company externally; and
- Obtain advance approval to hire an outside lobbyist or outside lobbying firms.

### As a Company employee, I will not:

- Seek Company reimbursement, ever, for personal political contributions to candidates, political action committees (PACs), parties and/or ballot measures;
- Give business courtesies or gifts to government officials (regulators, policymakers or their employees) without first gaining clearance from the Corporate Citizenship department;
- Make corporate political contributions of cash, time or in-kind services without first gaining clearance from the Corporate Citizenship department;
- Work on a political campaign for a candidate, ballot measure or proposition during working hours, or use Company facilities or property for this purpose unless it is a campaign or measure sponsored by the Company and/or I am an employee who has been designated to support the effort;
- Coerce or pressure an employee, contractor, vendor or business partner to contribute to, support, or oppose any political group, candidate or ballot measure; nor
- Display political messaging in common areas - I must use common sense when it comes to personal office space and the use of political buttons, pins, signage and other materials in the workplace.

**Learn more >** Refer to the [Political Activities](#) and [Anti-Bribery and Anti-Corruption](#) policies.

## Q&A

**I am having a lunch meeting with a city public official to discuss an issue pending before the city. I would like to pay for the city official's meal. Should I have any concerns?**

*Yes, because in many cities, states and countries where we do business, or are planning to do business, strict laws and limits regulate lobbying and gift-giving, including meals and beverages. Contact the Legal or the Corporate Citizenship department to understand these regulations and the applicable reporting requirements before proceeding.*

**We do business in countries where some 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 and may be further complicated based on the country and several other factors. You should assume that all employees of city, state and federal organizations and their agents are government officials. Numerous local and national laws apply when the government is involved, so ask your supervisor, the Legal or Corporate Citizenship department for assistance.*

## **Q&A**

**I've been negotiating a contract with a new construction company whose price and expertise are in line with the project scope. Nonetheless, the contractor seems to be offering me some unusual things like offering to do construction work at my home for half the market price. Is this an issue?**

*While it may seem like a favor because of your ongoing discussions, these items are "red flags" for commercial bribery as they could be perceived as you are receiving something of value in exchange for a favorable outcome for the contractor. You should refuse the offers and alert your supervisor to your suspicions, even if you're not certain what they could mean or if they're acceptable. You can also contact Corporate Compliance.*

We are committed to conducting business in an open and straightforward manner, maintaining high ethical business standards, and not using improper influence to obtain or retain business. Company employees must comply with all applicable anti-corruption, anti-money laundering and economic sanction laws and also act 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 a Company employee, I will:**

- Obtain approval from a Compliance Representative or Compliance Counsel before:
  - Making gifts or business courtesies to foreign government officials;
  - Acquiring corporate or individual memberships in countries outside the U.S.;
  - Making charitable contributions or sponsorships in countries outside the U.S.;
  - Hiring third party representatives; and
  - Entering into joint ventures with third parties or outside the U.S.
- Report immediately any possible foreign transactions or activities that appear outside the normal scope of business or that appear unusual or excessive to my supervisor, the Legal department, the Ethics & Compliance Helpline or any of the other resources listed at the end of this Code.

### **As a Company employee, I will not:**

- Make improper payments to a government, a government official, a foreign government official, or 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 any cash equivalent, in-kind services, donations, contributions, loans and/or gifts intended to influence another party.
- Confuse improper payments with reasonable and bona fide gifts or business courtesies directly related to the products or services, or the execution of a contract with a government or agency. These gifts and business courtesies may be acceptable, but subject to additional Company policies. Rather, I should contact the Legal department for guidance prior to dealing with any foreign government official.

**Learn more >** Refer to the [Anti-Bribery and Anti-Corruption](#) and the [Economic Sanctions and Anti-Money Laundering](#) policies.

## BUSINESS GIFTS OR COURTESIES

### Understanding Influence

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Exchanging gifts and business courtesies, such as entertainment, meals, recreation or promotional items, can enhance business relationships. However, exchanging these gifts or courtesies improperly can raise serious ethical and legal questions, which could harm or embarrass you and the Company.

#### **As a Company employee, I will:**

- Ensure all gifts and business courtesies are consistent with accepted business practices and are of local customary value; and
- Disclose any offers or actual gifts or courtesies to my supervisor if others could perceive them as more than mere tokens.

#### **As a Company employee, I will not:**

- Accept or provide gifts or business courtesies if they compromise or may be perceived to compromise my ability to make a fair and objective business decision;
- Accept gifts or business courtesies that if publicly disclosed, would affect the company negatively;
- Ask for gifts or business courtesies, or accept cash or its equivalent as a business courtesy;
- Accept or solicit tips or gratuities for services performed as part of my duties; nor
- Use my position to solicit vendors to provide preferential personal treatment.

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

**Learn more >** Refer to the [Business Courtesies–Accepting and Giving Gifts or Gratuities policy](#).

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#### **Q&A**

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

*Review the [Business Courtesies–Accepting and Giving Gifts or Gratuities policy](#). You may accept gifts or offers of business-related meals or entertainment only when the value involved will not place you under any real or perceived 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 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.*



**ENSURING BALANCE – IN OUR MARKETPLACE**

My commitment,  
every day

The Ethics & Compliance Helpline is available globally 24 hours a day, seven days a week.  
United States: (800) 793-7723 Mexico: 001-770-582-5249 [SempraEthics.com](https://www.SempraEthics.com)



## FAIR COMPETITION

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The Company strictly follows 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. The laws prohibit any agreement that has the effect of unreasonably restraining competition.

### **As a Company employee, I will:**

- Comply with federal and state antitrust laws and similar laws in any country where we do business;
- Where possible, always consult the Legal department before meeting a competitor;
- Take care that participation in industry or trade association events is not used for anti-competitive purposes; the same applies to less formal meetings and social contacts;
- Object immediately if inappropriate topics are raised in any industry or trade association discussion and leave immediately if such discussion continues; and
- Report any incident of inappropriate discussions immediately to my supervisor and the Legal department.

### **As a Company employee, I will not:**

- Take part in illegal, anti-competitive acts; nor
- Discuss or agree to any of the following, directly or indirectly, with competitors:
  - Price or terms of sale for products and/or services;
  - Price or terms to be demanded from suppliers;
  - Coordination or allocation of bids;
  - Division or allocation of geographic markets, customers or services; nor
  - Boycott or refusal to deal with certain competitors, customers or suppliers.

We have become a trusted partner by dealing fairly with our customers, suppliers and competitors. We do not take unfair advantage through manipulation or misrepresentation of facts. All employees are responsible for maintaining trust and must avoid making untruthful statements about our products or services and those of our competitors.

In addition to complying with all fair competition laws and being a trusted partner, the Company 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, the Legal department or contact the Ethics & Compliance Helpline.

**Learn more >** [Refer to the Antitrust Compliance policy and guidelines.](#)

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## Q&A

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

*No. Obtaining information from a competitor by misrepresenting your identity or by inducing a third party's employee to divulge confidential information is inappropriate. Gathering information about our competitors is a legitimate business activity when done lawfully and ethically. You can find acceptable competitive information by reviewing industry analyst reports, non-confidential customer or supplier intelligence or public information.*

## REGULATORY COMPLIANCE

### Q&A

**Some of the laws in my country make it difficult to get all the potential business we can and I don't believe all our competitors are playing by the rules. If they aren't, 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.*

We follow all rules and regulations set by local, state and federal authorities in all countries where we do business. As employees, we have a responsibility to know the laws, rules and regulations that apply to our jobs. Non-compliance or any violation of these regulations may expose the Company and you as an employee to severe penalties, criminal punishment and business restrictions.

#### **As a Company employee, I will:**

- 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);
- Comply with anti-conduit rules; and
- Always use discretion when communicating in common areas, such as hallways, cafeterias and elevators or when sending emails to avoid unintentionally violating regulations or disclosing confidential information.

#### **As a Company employee, I will not:**

- Share prohibited information between departments and affiliates.

**Learn more >** Refer to the [Affiliate Compliance policy](#) and the [Affiliate Compliance website](#).

## CONFLICTS OF INTEREST

### Seeing The Big Picture To Avoid Potential Issues

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Company employees must always work for the best interests of our Company. 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.

#### **As a Company employee, I will:**

- Make all my work decisions based on the best interests of the Company and not on personal interests;
- Avoid any activity that involves even the appearance of a conflict of interest;
- Pay special attention to potential conflicts with customers, suppliers and competitors, including business with personal friends or family;
- Inform my supervisor and a Human Resources representative if I intend to participate in any other business or gainful employment outside of work with the Company; and
- Inform my supervisors if I believe a situation creates a conflict of interest for me.

#### **As a Company employee, I will not:**

- Accept business opportunities, commissions or discounts from others because of my position with the Company; nor
- Use others to do indirectly what I am not allowed to do.

Our intention is not to interfere with employees' activities outside of the workplace, but we do have an interest 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 >** Refer to the [Conflicts of Interest and Employment Eligibility & Hiring of Relatives](#) policies.

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## Q&A

**A contractor recently asked me to freelance as a graphic designer. The work would be limited to my off hours, and I would be provided a laptop and phone. I would be paid hourly to perform small projects for other businesses, but I would not perform work for my employer. I would really like to take advantage of this opportunity to earn additional income. What should I do?**

*You must let your supervisor and Human Resources know (using the Notification and Consent Form that is attached to the Conflict of Interests policy). Management and Human Resources can assist employees in ensuring that outside activities do not conflict with legitimate business concerns.*

## INTELLECTUAL PROPERTY

### Recognizing and Respecting Ownership

#### Q&A

**I am giving a presentation at an industry conference. I would like to use some audio and video clips I found on the Internet. Am I allowed to use these clips or do I need to ask for permission from the owner?**

*Refer to the [Use of Copyrighted Materials](#) on SempraNet to research if we have a license to use the content. If you are unsure, contact Corporate Compliance or the Legal department.*

Intellectual property consists of elements such as copyrights, patents, trademarks, design rights, logos and trade secrets. The law protects our ownership and other interests in this type of property just as it protects ownership of physical property rights. We also recognize and respect the intellectual property rights of others.

Copyrighted work can include material downloaded from the Internet – including clipart, images, artwork, photos, music and videos, as well as computer software. Creating unauthorized copies of copyrighted material may result in violations.

The Company has agreements with various licensing entities that provide permission for business use of others' copyrighted materials (e.g., published media, video/audio and music).

#### **As a Company employee, I will:**

- Be respectful of the copyrighted materials of others; and
- Ensure that the appropriate permissions have been obtained before using copyrighted material.

#### **As a Company employee, I will not:**

- Copy or improperly use or distribute copyrighted work without the owner's permission; nor
- Use intellectual property nor acquire another companies' intellectual property through improper means, such as deceit or misrepresentation.

**Learn more >** Refer to the [Use of Copyrighted Materials policy](#) or visit the [Use of Copyrighted Material](#) website.



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**LEADING THE WAY – FOR OUR SHAREHOLDERS**

My commitment,  
every day



## FINANCIAL RECORDS

# Honesty and Accuracy, Always

### Q&A

**Last week, I helped 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. You did the right thing in discussing your concerns about the integrity of the transaction with your supervisor. Since your questions weren't answered satisfactorily, you should speak to a higher level of management or contact the Ethics & Compliance Helpline.*

The integrity of our financial records is crucial to our business and to maintaining the confidence and trust of our employees, shareholders and other stakeholders. Our financial records underpin the Company's filings with government agencies. In addition, the integrity of our 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.

### As a Company employee, I will:

- Properly record, classify and summarize all financial transactions;
- Contact my accounting department or controller if:
  - I am not sure about the proper way to record or document a transaction; and
  - I am being asked to create a document or to record a transaction in a less-than-honest and/or an inaccurate manner.

### As a Company employee, I will not:

- Artificially inflate or shift revenue or earnings between reporting periods;
- Improperly classify expenditures;
- Produce or maintain undisclosed or unrecorded accounts, funds, assets or liabilities; nor
- Conceal, alter or falsify financial records, accounts and documents.

**Learn more >** Refer to the [Financial and Accounting policies](#).

## INTERNAL BUSINESS CONTROLS

### Staying On A Steady Course

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The Company's internal business controls are designed to safeguard our assets, prevent and detect fraud and error, promote accurate and complete accounting records and ensure timely preparation of financial information. These internal business controls provide structure for the orderly and efficient conduct of our business.

#### **As a Company employee, I will:**

- Confirm that I have authority to sign or approve on behalf of the Company;
- Follow internal business controls and all associated policies and procedures;
- Report situations if internal business controls are being bypassed or ignored;
- Raise concerns if an internal business control is not effective; and
- Provide supporting documentation for all business expenses.

#### **As a Company employee, I will not:**

- Make unauthorized financial commitments;
- Approve commitments without thorough review; nor
- Sign certifications without full understanding as to what I am certifying.

**Learn more >** Refer to the Internal Control, Approval & Commitment, Employee Business Expense, Procurement, FB Card and Travel policies.

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#### **Q&A**

**I was asked to approve an invoice. What should I do?**

*Never approve financial commitments without thoroughly reviewing them. When asked to approve an invoice you must review and understand what you are being asked to approve, ensure that all associated policies and procedures have been followed and confirm that you have the financial authority to approve before you do so.*

## COMPANY ASSETS

# Protecting Corporate Value

### Q&A

**What can I do to help prevent the risk of data or information theft on the laptop I use for work?**

*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, put it in front of you. Avoid leaving 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.*

Every employee has a responsibility to protect the Company's assets, including physical assets, financial assets and intellectual property. Theft, malicious behavior, carelessness and waste can directly impact our financial and reputational success.

### As a Company employee, I will:

- Protect assets in a manner that prevents theft or malicious use of property;
- Understand that if I use my personal devices for Company business or in a way that impacts the workplace, the Company will have the right to inspect those devices and see what I have done with them;
- Use Company assets, information and time solely for legal and ethical business purposes; and
- Dispose of Company assets in an appropriate manner and with proper approval.

### As a Company employee, I will not:

- Use Company assets for non-business purposes, including vehicles, equipment, tools and Company information unless I have obtained specific approval for non-business use;
- Use personal electronic devices such as laptops and smartphones in any manner that interferes with my work duties or in violation of any laws, regulations or Company policies;
- Use Company electronic devices such as laptops and smartphones excessively for personal reasons or in any manner that interferes with my work duties or is in violation of any laws, regulations or Company policies; nor
- Provide our Company name or logo for sponsored events, marketing promotions or commercial ventures, without prior approval.

**Learn more >** Refer to the [Approval & Commitment](#), [Employee Business Expense](#), [Co-Branding: Use of the Company Name and Logo by Third Parties](#), and [Information Security and Acceptable Use](#) policies.

## MEDIA RELATIONS AND ONLINE/SOCIAL MEDIA

### Thinking Before Acting

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As Company employees, we must speak with a consistent, clear voice to the media and other outside stakeholders. To ensure this consistency, each organization has designated spokespeople. If your role does not specifically involve responding to media or other outside inquiries, you may not make any statements on the Company's behalf.

#### **As a Company employee, I will:**

- Use common sense with all social media postings; and
- Clearly disclose my relationship to the Company and include this disclaimer: "The views and opinions expressed in any posts are mine, and do not necessarily reflect the views of my company".

#### **As a Company employee, I will not:**

- Represent the Company or make any statements on the Company's behalf with the media or other third parties, (unless I am designated to do so by the Communication department and doing so as part of my job);
- Create official Company postings (unless I am part of the Communication department and doing so as part of my job);
- Share non-public information;
- Misrepresent myself;
- Post anything that could be considered defamatory, threatening or an invasion of privacy; nor
- Use derogatory remarks, obscenities or inappropriately colorful language.

**Learn more >** Refer to the *Insider Trading and Information Confidentiality, Information Security and Acceptable Use, Media Relations and Social Media Guidelines* policies.

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#### **Q&A**

**I am working on an engineering project that will help our Company increase efficiency. I have a friend who is working on a similar project at another company and if we can easily compare notes, perhaps we can come up with an even better solution. I am planning to explain some of the project details on my friend's Facebook page. Is that acceptable?**

*No, it's not okay. Even though your project is still a work in progress, sharing it with your friend, and over social media, reveals confidential information that could put the Company at a competitive disadvantage. You should never post information about Company projects on social media - and if you ever do make such a mistake you should delete the post immediately and notify your supervisor that confidential information has been disclosed.*

### Q&A

**My supervisor has asked me to upload company information to Dropbox so it can be accessed by a consultant we have engaged. Is this a proper request?**

*No. Employees may only store Company information on repositories which are Company-owned or Company-controlled. Use of unapproved repositories exposes our information to risks such as confidentiality, accessibility and retention. You should tell the contractor that you will place the documents on our corporate SharePoint site, where the information can be maintained safely. If you need additional assistance, you should check with your Information Coordinator, the Information Manager for your company or the Legal department.*

Our business information is a high-value asset. To safeguard and maximize that value long term, it is important that we all play a part in retaining, protecting and properly disposing of the Company's information regardless of the location or format in which it is stored.

#### **As a Company employee, I will:**

- Retain records under my control according to the applicable records retention schedule;
- Evaluate the useful life of non-records, and preserve the information so that it is accessible to the right people at the right time; and
- Protect the security and integrity of information to prevent it from getting into the wrong hands and to help ensure that it is reliable.

#### **As a Company employee, I will not:**

- Dispose of any information that has been placed on Legal Hold;
- Store information in repositories that are not Company-owned, or Company-controlled (e.g., Google drive); nor
- Disclose information to external third parties without approval from the information owner.

**Learn more >** Refer to the [Information Management](#), [Legal Hold and Records Preservation](#), and [Information Security and Acceptable Use](#) policies.

## SECURITIES TRADING

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Trading Company stock, while in possession of material, nonpublic information (insider trading), is against Company policy and insider trading laws that can lead to fines and/or imprisonment. Insider trading restrictions generally do not apply to recurring purchases of Company stock under the Company's employee savings or dividend-reinvestment plans, like the 401(k) retirement savings plans. The restrictions do apply to increases and decreases to employee savings plan investments in Company stock, transfers into or out of 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, these restrictions apply to your family members living in your household.

### **As a Company employee, I will:**

- Exercise great care and restraint when asked about the Company's performance or future performance, whether I am in possession of material, non-public information or not; and
- Be mindful of blackout periods in and around earnings announcement if I am on the list of employees subject to blackout periods.

### **As a Company employee, I will not:**

- Buy or sell securities of the Company, or any other public company, while in possession of material, non-public information related to those companies;
- Pass along non-public information to others or make recommendations to others to buy or sell securities based on material, non-public information;
- Trade inputs, calls, options warrants or similar instruments or derivative securities relating to securities of any Company stock; nor
- Sell "short" any securities of the Company.

**Learn more >** Refer to the [Insider Trading and Information Confidentiality](#) policy.

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## Q&A

**My friends often ask me about the Company and if they should buy stock. Can I share how the Company is performing and recommend that they buy the stock?**

*If you do not provide non-public information or do not make recommendations based on material, non-public 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, so the safest approach would be to avoid making any recommendations.*



## GLOSSARY

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### Business Courtesies

Generally items or anything of value given to another free or discounted as part of a potential business relationship. Examples include gifts, meals, drinks (e.g., cup of coffee), edibles (such as boxes of chocolates, fruit baskets), entertainment (such as tickets to sporting events or concerts), recreation (such as golf course fees or sailing excursions), raffles, honoraria, transportation, discounts, promotional items and accommodations. This also includes anything of value being provided to a governmental official.

### Company

Sempra Energy and/or a subsidiary or other entity as to which Sempra Energy has majority ownership and control.

### Disclaimer

Additional statement to include in the “bio” section of personal social media accounts when discussing company materials.

### Financial Records

Company-related information that provides evidence of the Company’s financial transactions and that has business value, requiring its retention for a specific period. Financial records include documentation supporting the Company’s financial performance and preparation of financial statements, including, but not limited to, documentation supporting the Company’s assets, liabilities, equity, revenues, expenses and cash flows.

### Foreign Government Official

An officer, employee, agent or representative of any non-U.S. state-owned entity, government agency, department, corporate entity or political subdivision, international organization, or any candidate for political office, political party or an official of a political party.

### Government Official

An officer, employee, agent or representative of any government agency, department, entity or political subdivision, or any candidate for political office, political party or an official of a political party at the federal, state and local level of government, as well as their staff members. Each jurisdiction defines Government Official differently and requires different levels of reporting.

### Human Rights

Human rights are rights inherent to all human beings, regardless of race, color, national origin, ancestry, citizenship, religious creed, physical or mental disability including HIV and AIDS, cancer, genetic characteristics, marital status, gender, sexual orientation, gender identity or expression, age, pregnancy, childbirth, or related medical conditions, family and medical care leave, military status, or political affiliation. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

### Lobbying

Although definitions vary greatly by jurisdiction, lobbying is generally defined as communication with a Government Official intended to influence legislative or administrative action. You do not have to be a registered lobbyist to engage in lobbying.

## GLOSSARY

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### **Material Information**

Generally, information is “material” if a reasonable investor would consider it important in making an investment decision.

### **Non-public Information**

Information is “non-public” if it has not been widely disseminated in a manner calculated to make it generally available to investors such as through public filings by the company with the SEC or through broadly disseminated press releases by the company over a national newswire service. The circulation of rumors, even if accurate and reported in the media, does not constitute effective public dissemination.

In addition, even after a public announcement, for material information to become “public,” a reasonable period must pass for the trading markets to react to the information. Generally, two full trading days after publication should pass before considering material information to be public.

### **Political Action Committee or PAC**

An organization that raises money to contribute to political campaigns. Sempra Energy sponsors an employee-funded political action committee (SEEPAC), which raises money from its eligible employees.

### **Spokesperson**

Designated by authorized Sempra Energy Communications department staff, to speak on behalf of Sempra Energy or one of its subsidiaries.



## RESOURCES

# For More Information And Help

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Along with reaching out to 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 globally 24/7)

- United States: (800) 793-7723
- Mexico: 001-770-582-5249
- Report on-line at: [SempraEthics.com](http://SempraEthics.com)

### **Human Resources:**

- Corporate Center: (619) 696-2486
- SoCalGas: (213) 244-3369
- SDG&E: (858) 637-7924
- Sempra LNG: (619) 696-4206

### **Security:**

- United States: (619) 725-8611
- Mexico: 52 559 138 0122

### **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 Sempra Company, please reference your Sempra Company intranet site or ask your supervisor for guidance.

**The Ethics & Compliance Helpline is available globally  
24 hours a day, seven days a week online and by phone.**

**[SempraEthics.com](https://www.sempraenergy.com/ethics)**

**U.S. contact: (800) 793-7723**

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

