

Reporting – General

Process and Definitions

Common Code of Conduct Questions

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Q: What is the Compliance and Ethics (C&E) Helpline?

A: The C&E Helpline is an all-purpose resource for any concerns. If you are not sure where to turn, the C&E Helpline will determine where to take the issue and provide you with guidance on next steps. You can contact the C&E Helpline 24/7 at **1-888-231-2310** or pgecorp.ethicspoint.com to request guidance on our Code of Conduct or make a good faith report about violations of our Code of Conduct, accounting issues, or illegal activity. You may remain anonymous.

Q: Where should I go if I have a concern about misconduct?

A: You have many ways to speak up to voice a concern. You can contact your immediate leader. If the issue involves your leader or you are uncomfortable with that approach, consider elevating your concern to the next level of management. Know that you are not required to go to a leader. You can also contact the Compliance and Ethics Helpline to request guidance or report violations of our Code of Conduct, accounting issues or illegal activity. You may remain anonymous.

Q: Who do I contact if I want to report safety and equipment issues, non-compliance, ineffective or inefficient work processes and procedures, and process improvement ideas?

A: Employees and contractors should contact the **Corrective Action Program (CAP)** at **1-855-85-GO-CAP**, the company intranet, or the CAP app on your company-issued smartphone to report safety and equipment issues, non-compliance, ineffective or inefficient work processes and procedures, and process improvement ideas.

Q: What is the independent Federal Monitor program?

A: PG&E currently in a probation program as part of the company's sentence for violating the National Gas Pipeline Safety Act and for obstructing an agency proceeding. The program includes an independent Federal Monitor and we are fully cooperating with the monitor team.

Q: How do I contact the Federal Monitor?

A: If you are uncomfortable with contacting a PG&E leader, the C&E Helpline or the Corrective Action Program, you may contact **PG&E's Federal Monitor** directly to share your concerns. Their contact information is: phone number 855-585-0703; website is www.intouchwebsite.com/PGEMonitor; or email at PGEMonitor@getintouch.com. Please note: the Monitor is not equipped to handle safety emergencies or other issues requiring immediate attention.

Q: Are PG&E contractors bound by our Code of Conduct?

A: We expect all our non-employee workers, consultants, vendors and other suppliers to behave ethically and comply with applicable laws, regulations and policies and our Supplier Code of Conduct, which covers all the essential topics that our Code of Conduct covers.

Q: May I report using either the Internet or the telephone?

A: Yes, you can file a report via either the telephone or the Internet.

Q: Does management really want me to report?

A: We certainly do. In fact, we need you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance. If you would like guidance on our Code of Conduct or make a good faith report about violations of our Code of Conduct, accounting issues, or illegal activity, then contact the C&E Helpline.

Q: I am concerned that the information I provide will ultimately reveal my identity. How can you assure me that will not happen?

A: The system is designed to protect your confidentiality. If you wish to remain anonymous, you -- as the reporting party -- need to ensure the details of the report do not reveal your identity by accident. For example, "From my cube next to Jan Smith ..." or "In my 33 years ...".

Q: Is the telephone toll-free hot line confidential and anonymous too?

A: Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type up your responses. These reports have the same security and confidentiality measures applied to them during delivery.

Process and Definitions

Q: What does Speak Up, Listen Up and Follow Up mean?

A: If you encounter activities at work that you believe may present a safety issue, constitute misconduct (including unethical behavior) or is a violation of applicable laws or regulations, speak up immediately to your leader or other PG&E personnel.

All employees, especially leaders, have a duty to listen to any other employee who speaks up and raises a concern about safety or any other ethical or legal matter.

Leaders have a duty to follow up on any issues raised by an employee who speaks up to make sure the issue is resolved and the employee understands that his or her concern has been properly addressed.

Q: Where do these reports go? Who can access them?

A: Reports are entered directly on the systems secure server to prevent any possible breach in security. The system then makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident.

Q: What is retaliation?

A: Retaliation is adversely changing an employee's condition of employment without grounds or for a non-business reason. Retaliation also includes threatening an employee for raising a concern. Employees who speak up will not be put at any disadvantage by PG&E as a result of their report. Retaliation is harmful to the employee and can have a chilling effect on other employees in the work group. At PG&E, we don't tolerate retaliation against anyone who raises good faith concerns or has cooperated in an investigation. Leaders have a duty to act to address retaliatory actions that come to their attention.

Q: What is sexual harassment?

A: Unwelcome sexual advances, requests for sexual favors and other verbal overtures or physical contact of a sexual nature constitute sexual harassment and will not be tolerated. This policy includes any communication, text, image, data, sound or other information that is inappropriate or contains sexually explicit material. Employees who witness or are experiencing harassing behavior have a duty to report it.

Q: What is "ex parte" communication?

A: "Ex parte" means communication between a decision maker and an interested person that is not part of the official record of a proceeding. The Code now defines and prohibits unauthorized *ex parte* communication in any formal proceeding.

Q: What information should I provide when I report possible employee misconduct?

A: Be prepared to provide as much detail as possible, including the following:

1. A specific description of the issue or concern.
2. The line of business (LOB and LOB subgroup) and department involved.
3. The name(s) of the employee(s) involved in any alleged misconduct and LAN ID, if possible.
4. The name(s) of other employee(s) who may be aware of the situation and can be interviewed (this is very important).
5. The location where the incident took place.
6. The date and time the incident occurred.
7. Any documentation or records that could be reviewed to support your concern.
8. How you became aware of the issue.

Q: After I submit my concern to the C&E Helpline, what happens?

A: Once you have submitted your concern, the system will forward a summary report to PG&Es Compliance & Ethics (C&E) department. If the issue requires investigation, the C&E representative will assign the report to the appropriate investigator (*i.e.*, Human Resources or Corporate Security) and will stay in touch with the investigator until they complete the investigation. Once there is an assigned investigator, you will be informed who your investigator is and their contact information, either via company email or through the secure website, if you choose to remain anonymous.

Q: What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

A: When you file a report through the web site or via phone, you receive a unique user name and are asked to choose a password. You can return to the system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues.

If you choose to report anonymously, we strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

Q: What if my leader or other managers are involved in a violation? Won't they get the report and start a cover-up?

A: The system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

Common Code of Conduct Questions

Q: What is PG&E's gift limit?

A: The total value of all items given or received over a 12-month period must not exceed \$100 from a single entity. PG&E employees, immediate family members, contractors, consultants, those seeking to do business with PG&E and our suppliers are subject to the same rules regarding gifts and entertainment.

Q: Can I accept a \$10 gift card from a satisfied customer?

A: You may not accept cash or gift cards under any circumstances from a third party, a customer or a contractor. Cash and cash equivalents (e.g., gift cards) are not "gifts"; they are compensation. PG&E-funded gifts to employees must be made in accordance with PG&E's Rewards and Recognition program.

Q: The conference I am attending is giving away iPads to the first 100 people who register. Can I keep the iPad?

A: Employees may not accept gifts such as electronic devices, laptops, tablets, cell phones, etc., valued over \$100. Receiving a gift of this type as part of a registration fee can create a sense of obligation or the appearance of an obligation.

Q: I am the guest speaker at an upcoming conference and the vendor hosting has offered to cover my registration fee. Can I accept?

A: If an employee is a guest speaker at a conference hosted by a vendor or other third party, the conference host may pay the employee's conference registration fee only. PG&E is responsible for paying for the employee's airfare, lodging and other expenses associated with attending the conference.

Q: If I attend an approved conference as a PG&E representative, can I consume alcohol that may be served at a reception?

A: If you attend a conference on behalf of PG&E and alcohol is served in the evening at a reception or meal, you may consume alcohol in moderation. However, be mindful that your actions impact PG&E's reputation, and you may not conduct official business while under the influence of alcohol.

Q: Now that recreational use of marijuana is legal in California, what is the company policy on possessing or using marijuana?

A: Our alcohol-free and drug-free workplace policy has been revised to include a prohibition against being under the influence of either medical or recreational marijuana while working or on company property. The Code continues to prohibit transporting illegal drugs or alcohol in a company-owned, rented or leased vehicle, or a personal vehicle while on company business.

Being under the influence of alcohol or drugs, including recreational and medical marijuana, while working or while on company property is prohibited. Employees may not transport alcohol or illegal drugs in a company-owned, rented or leased vehicle, or a personal vehicle while on company business. In rare circumstances, employees may seek prior consent from a director or above to transport alcohol in a company-owned, rented or leased vehicle.

Q: Can I use a mobile phone while on a break at a job site?

A: If the mobile phone was issued by PG&E, limited personal use is permitted if the use is incidental to business. This rule also applies to other PG&E assets, such as personal computers, telephones, fax machines, copy machines and conference rooms. However, employees should have no expectation of privacy when using them. Use of your personal mobile phone during work hours is determined by local supervision, and should never be excessive or interfere with work.

Q: Our team regularly has lunch at a café near the service center. The food and service are really good. Can I post a favorable review of this café on Yelp?

A: PG&E does not endorse products or services, or the firms or individuals who supply them. Favoritism must not be implied by testimonials or endorsements. If you want to provide a personal testimonial or endorse an event, product or service, do not use your job title or affiliation. If you have questions about endorsements, please contact the Compliance and Ethics Helpline. Any exceptions must be approved by Marketing and Communications.

Q: I would like to take a part time job working with my brother who is an electrical contractor. His firm installs electrical systems on commercial buildings. Am I permitted to do work for him?

A: PG&E does not replace electrical panels inside commercial buildings, so you may perform the work as long as you follow the guidance provided in the Conflict of Interest standard (add link to the standard).

Q: My brother would like to get a job working for PG&E. Can I recommend him to my manager?

A: You may certainly recommend him, but he would have to go through the regular PG&E employment process and you could not use your position to give him favored treatment. We don't tolerate favored treatment, which is using your position to obtain preferential or advantageous treatment for yourself or your close personal relationships. This includes hiring or promoting employees, selecting contractors or vendors, or participating in investment opportunities to which you're made privy as an employee of PG&E.

Q: I have a licensed handgun that I use for recreational target practice at a licensed shooting range. Can I carry that gun in my car when I come to work?

A: No, we do not permit weapons in our workplace or on our job sites. Weapons may not be brought, carried, stored or used on property or in vehicles that are PG&E-owned, leased or rented, or in a personal vehicle while being used for PG&E business, unless there is an authorized and legitimate business reason to do so.