

# PPL's Standards of Conduct and Integrity for Suppliers

The Standards of Conduct and Integrity for Suppliers (“Supplier Standards”) are an integral part of the compliance program of PPL Corporation.

The Supplier Standards apply to every supplier of goods or services provided to PPL’s domestic subsidiaries other than LG&E and KU Energy, LLC and its subsidiaries (“PPL”), including the supplier’s employees, contractors, consultants, vendors, subcontractors, directors, managers, officers, and agents (collectively, “Supplier”). Every Supplier shall ensure that the Supplier Standards are shared with and reviewed by all individuals who perform work for or on behalf of PPL. These Supplier Standards apply to all activities undertaken on behalf of PPL or in connection with such Supplier’s agreement with PPL.

PPL is committed to maintaining the highest ethical standards, and PPL expects its Suppliers to share this commitment and to operate in compliance with all applicable laws, rules, regulations, policies, and procedures. Even in the absence of specific guidance, every Supplier must commit to PPL’s corporate core values and act on behalf of PPL with integrity in all its business decisions and practices. Although not every applicable law is explicitly mentioned in the Supplier Standards, full compliance with the Supplier Standards requires that the Supplier’s performance meets both the spirit and the letter of all applicable laws, rules, regulations, policies, and procedures. PPL takes noncompliance with the Supplier Standards seriously, and failure to comply with the expectations outlined in the Supplier Standards could result in termination of Supplier’s assignment and/or contract.

Any questions about the application or interpretation of the Supplier Standards should be referred to one (or more) of the following:

- PPL’s Ethics Helpline: 1-800-550-9418
- PPL’s Senior Counsel and Corporate Compliance Director: 610-774-5466
- PPL’s Corporate Audit & Business Ethics-VP: 610-774-5347
- Director – Supply Chain: 610-774-6164
- Supplier’s PPL contact or the person to whom the PPL contact reports

## Respect for Others

### Workplace and Public Safety

PPL is committed to a safe and secure work environment. All Suppliers who work on PPL property or with PPL equipment must implement safe work practices and take appropriate security precautions. Requirements for safe work practices are established by laws and regulations, and Suppliers are also expected to adhere to all contract and site-specific requirements.

### Workplace Conduct: No Discrimination or Harassment

PPL strictly prohibits any form of harassment or discrimination in its workplace. PPL will not tolerate harassing or discriminating conduct based on any impermissible classification, including but not limited to race, color, national origin, gender, age, religion, citizenship, gender identity, sexual orientation, protected veteran status, or disability. Prohibited conduct can include, but is not limited to, epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; written or graphic material that denigrates or shows hostility or aversion toward an individual or group; or any conduct that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. In addition, sexual harassment includes linking a person's submission to, or rejection of, sexual advances to any decision regarding that person's terms or conditions of employment..

### Drug and Alcohol Use

Suppliers are required to report to work in appropriate mental and physical condition to perform their services for PPL in a satisfactory manner. Accordingly, being under the influence of alcohol or illegal drugs while working on PPL property or with PPL equipment, and the possession, use, sale, manufacture, promotion, or distribution of any illegal drugs or controlled substances on PPL property or PPL time, are strictly prohibited.

### Respect for the Environment

PPL's Suppliers and their employees and subcontractors have an obligation to carry out all their activities on behalf of PPL in ways that preserve and promote a clean, safe, and healthy environment, which includes understanding and abiding by PPL's environmental policies and the environmental laws and regulations of the locations in which PPL operates.

## Bribery and Conflicts of Interest

A conflict of interest arises when any employee of a Supplier has the opportunity to influence decisions in a way that could lead to improper benefit or advantage for the Supplier, PPL, or the employee individually. Conflicts may also arise when a Supplier has any employee whose spouse, partner, or other member of such individual's immediate family is employed by PPL in a capacity that could have influence over the Supplier's

selection or evaluation. The circumstances raised below provide additional guidance; however, it is PPL's expectation that all Suppliers will disclose to PPL any potential conflicts of interest and ensure that their employees avoid any conduct, even if not described specifically herein, that could create the perception of impropriety, whether in the Supplier's relationship with PPL or the Supplier's relationship with others, such as government regulators or other Suppliers.

#### Improper Influence and Bribery of Third Parties

PPL strictly prohibits bribery in any form. PPL expects its employees and its Suppliers and their employees to comply fully with all applicable anticorruption laws, including the U.S. Foreign Corrupt Practices Act (the "FCPA"). Suppliers should take note that such laws prohibit commercial bribery, as well as the bribery of government officials. In performing work for PPL, Suppliers must not offer, promise, pay, give, or authorize the giving of anything of value (such as gifts, business entertainment, discounts, meals, travel, goods, services, jobs for relatives, or charitable contributions) directly or indirectly (through a third party) to anyone (whether or not a government official) to influence a business or official decision and/or obtain or retain business or any advantage. Because even business courtesies, such as meals and entertainment, can give rise to a bribery offense if given to a government official, Suppliers are prohibited (unless expressly authorized in writing by PPL) from offering gifts, meals, entertainment, or hospitality of any kind to any foreign or domestic government official, whether federal, state, or local, with whom Suppliers interact on behalf of PPL.

#### Improper Influence and Bribery of PPL

Suppliers must avoid any action constituting, or even giving the appearance of, an attempt to improperly influence PPL. Suppliers must never offer or give any money, offers in kind, bribes, or kickbacks to PPL employees in order to influence a decision by PPL.

Providing or accepting gifts, meals, entertainment, or other hospitality (to or from PPL employees or other Suppliers) may create a conflict of interest or the appearance of a conflict of interest in certain circumstances. Gifts, promotional material, meals, entertainment, or other hospitality offered as a courtesy during the normal course of business or work relationship may only be accepted when they are permitted by applicable laws (so long as they are not in cash and are of modest value), appropriate under the circumstances, and a commonly accepted practice in the industry. However, when contract sourcing or rebid initiatives are approaching or underway, PPL does not permit Suppliers to provide any gifts, hospitality, or entertainment to any PPL employees who may be involved in the decision.

#### Gifts, Hospitality and Entertainment

Subject to the guidelines set forth above, PPL permits Suppliers to offer or accept meals, entertainment, or other hospitality offered as a business courtesy during the normal course

of business or work relationships with others, provided they are of modest value, in good taste, occur infrequently, and do not violate any applicable laws.

#### Outside Activities and Business Interests

Suppliers must not engage in any outside activity that conflicts with or otherwise compromises the Supplier's ability to perform the work that the Supplier has been contracted to perform on behalf of PPL. Suppliers must promptly disclose (in writing) to their PPL contact actual or potential conflicts of interest caused by outside activities or conflicting business interests.

#### Insider Trading

Securities laws of the United States and many other countries prohibit anyone from buying or selling securities when they are in possession of "material, nonpublic information," including that contract negotiations are underway or that awards have been granted (also known as "insider trading"). Passing such information on to someone who may buy or sell securities – known as "tipping" – is also illegal. Improper use or disclosure of material nonpublic information could result in violations of federal securities laws and is prohibited. Note that such prohibition includes trading in PPL's or other companies' securities on the basis of any material nonpublic information that may be obtained in the course of Supplier's work for PPL.

## **Competition and Regulation**

#### Antitrust Laws

The U.S. antitrust laws (among other things) prohibit monopolistic practices and agreements among competitors that fix prices, divide markets, or limit production. Conduct or business activities occurring outside the United States that have an effect on trade or commerce within the United States may also be subject to U.S. antitrust laws. In any circumstances while acting on behalf of PPL, Suppliers are expected to understand and fully comply with all such laws.

#### Labor Issues & Human Rights

Suppliers are expected to comply with all applicable U.S. and international labor and employment laws including, but not limited to, those associated with equal employment opportunity, immigration, child labor, forced or involuntary labor, working hours, wages and benefits, freedom of association, and a harassment-free work environment.

## **Fair Dealing**

Suppliers are required to deal fairly and honestly not only with PPL, but also governmental and regulatory bodies, customers, other Suppliers, competitors, employees, and anyone else

with whom a Supplier may have contact in the course of performing services for PPL. In conducting work for PPL, Suppliers must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other manner of unfair dealing. Suppliers must represent PPL honestly in every communication with a customer, even if it means losing a sale.

#### Supplier Diversity and Procurement

PPL values diversity and is committed to compliance with laws related to Supplier diversity. PPL does not unlawfully discriminate in the selection of Suppliers, and PPL expects its Suppliers to support this commitment and select their subcontractors and suppliers based on merit, considering things such as price, quality, reputation, and integrity, and not based on any personal interest that the Supplier or any employee of the Supplier may have. In making procurement decisions for PPL, including the selection of subcontractors, all Suppliers engaged in such activities are expected to develop and maximize opportunities for diversity and to make procurement decisions with uncompromised objectivity of judgment and in the best interests of PPL, using consistent and unbiased standards. It is critical in all phases of the procurement process that Suppliers make the best business decision for PPL.

## **Protecting Company Assets and Customer Information**

Protection of Company assets is everyone's responsibility at PPL, including its Suppliers. PPL's assets include physical assets, such as buildings and equipment, as well as non-physical assets, such as electronic data and PPL procedures. Suppliers are responsible for protecting PPL assets from loss, misuse, theft, fraud, damage, and unauthorized personal use.

#### Computer Resources

If PPL provides access to its Internet, intranet, or e-mail systems to Supplier to assist with the performance of services for PPL, these systems are to be used for PPL business purposes only. Each Supplier needs to be particularly vigilant when accessing electronic devices or systems that may be exposed to the Internet in order to avoid compromising PPL's systems through a cyber-attack. Suppliers must never share computer IDs or passwords with another person.

#### Information Security

PPL's business information is confidential and proprietary. Information provided to Suppliers should not be shared with individuals outside of PPL except as specifically directed by PPL. Suppliers must ensure that confidential information is handled, maintained, transported, and disposed of appropriately. PPL expects all Suppliers' computers or computer systems that interact with PPL's computer network to possess the

necessary firewalls and other security features to guard against the introduction of any computer virus or other cyber threat into PPL's information systems. Documents and devices on which confidential information resides should be secured and never left unattended. Suppliers must also ensure that their employees, agents, and subcontractors have taken precautions to address the security of PPL's information technology assets, and have implemented plans to mitigate cyber security risks and vulnerabilities associated with work on behalf of PPL. Any question as to the appropriate treatment of any information should be referred to Supplier's PPL contact.

#### Information Concerning Customers, Suppliers, PPL Employees and Others

Suppliers are expected to treat as confidential information provided by PPL's customers or developed as part of PPL's business activities, and safeguard such information against inappropriate disclosure or access. Suppliers who have access to customer information, such as customer lists, customer use data, Supplier names, or billing rates must ensure that the information is not disclosed to others outside PPL without the customer's written approval or as required by law.

Any Supplier who collects, maintains, processes, transmits, or accesses personal information about customers or any other person, including PPL employees and contractors, must ensure that private information is not disclosed in violation of applicable laws, including data protection laws, and is handled in accordance with PPL's policies and procedures and the requirements established under the Supplier's contract with PPL.

#### Use of Company Assets

Suppliers are prohibited from using PPL's name or any other resources, such as PPL's logo, trademarks, or other intellectual property, unless specifically authorized in writing by PPL. Suppliers are also prohibited from using PPL's resources, information, property, or time charged to PPL to perform activities for the benefit of people or entities other than PPL, unless specifically authorized in writing by PPL.

## **Communications and Social Media**

#### Responding to External Inquiries

PPL has designated certain employees and other persons who are authorized to speak on behalf of the Company to the news media and members of the financial community (e.g., securities analysts). If a member of the news media or financial community asks for any information about PPL, Suppliers must not respond unless the Supplier has been authorized in writing by PPL to do so. Any such inquiries should be referred (and also reported) to PPL's Corporate Communications department or Supplier's PPL contact.

#### Responsible Use of Social Media

In their use of social media, Suppliers shall have policies and procedures in place to ensure that such media are being used properly, do not affect PPL's commitments to its customers, and do not interfere with job responsibilities. Social media activity includes, but is not limited to, all posts or communications on social media sites (e.g., Facebook, Twitter, LinkedIn) and the Internet, blogs, online chat rooms, etc.

## **Reporting and Handling of Suspected Violations**

Suppliers, their employees, and their subcontractors are expected to promptly report actual or suspected non-compliance with these Supplier Standards to their PPL contact or any of the contacts listed on page 1. The Company will not discriminate against or tolerate any form of retaliation toward Suppliers or their employees who ask questions or raise concerns in good faith, or toward Suppliers or their employees who participate in the investigation of a concern. However, it is unacceptable and a violation of these Supplier Standards to knowingly file a report or provide information that is false or misleading.