PPL CORPORATION

Standards of Integrity

OUR VISION AND VALUES IN ACTION
A Message from Vince Sorgi and Steve Phillips

Dear Colleague:

We are proud to be part of the highly skilled, intelligent and dedicated team in the United States and the United Kingdom that has made the PPL family of companies a top performer in the utility industry. To remain a top performer, we must continually overcome new challenges through innovation and determination to succeed. We know that meeting those challenges is critical, and meeting them in the right way is equally important.

Our Vision, Mission and Values along with our Standards of Integrity define how we conduct PPL's business. They set the foundation for our reputation as a company, our integrity as individuals, and the success of our operations. They apply in all situations, at all times, to all of us, guiding the decisions we make and the actions we take on behalf of PPL Corporation or any of its subsidiary companies.

Please join us in renewing and continuing our commitment to doing every job the right way.

Vince Sorgi
President and CEO

Steve Phillips
VP & Global Chief Compliance Officer

Our Vision, Mission and Values

Our Vision is empowering economic vitality and quality of life.
Our Mission is to provide reliable, safe energy at a reasonable cost to our customers and best-in-sector returns to our shareowners.

Our Values are:

• Safety and Health: We do not compromise on safety and health.
• Customer Focus: We deliver customer service that is second to none.
• Diversity and Engagement: We value each other and appreciate our differences.
• Performance Excellence: We get the job done right, and we are always improving.
• Integrity and Openness: We do the right thing.
• Corporate Citizenship: We are invested in the communities we serve.
Standards of Integrity

The commitments stated in these Standards of Integrity (“Standards”) reflect our values and principles. These Standards apply to all directors, managers, officers, employees and agents, as appropriate, of PPL Corporation and its subsidiaries. All employees and others subject to these Standards are expected to read, understand and comply with them, as well as any other applicable policy of PPL Corporation (“Company” or “PPL”) or of any subsidiary company of PPL. In many cases, more detailed policies of PPL Corporation are referenced (and linked in the online version) to provide additional guidance on expectations. References to PPL Corporation policies should be read as referring to applicable subsidiary company policies as well.

COMMITMENT TO COMPLIANCE

We’re committed to complying fully with the letter and spirit of all applicable laws, rules and regulations. We abide by all applicable policies, procedures and guidelines, including those contained within these Standards. We understand that any violation of these Standards can result in disciplinary action including termination of employment.

WE SPEAK UP

We understand that our willingness to speak up and to speak truthfully is integral to our compliance and ethics commitment and that we are required to do so under these Standards and other applicable policies. We ask questions when we are unsure about a situation in the workplace. We promptly report workplace concerns. We never file reports or provide information that we know to be false or misleading, and we are forthright and cooperative in investigations that PPL or its subsidiary companies conduct.

GUIDELINES FOR DECISION-MAKING AND WHERE TO GO FOR ASSISTANCE

Occasionally, situations may arise that are not specifically covered by the Standards or other relevant policies. When faced with a decision regarding one of those situations, it may be helpful to ask yourself the following questions about your action or inaction, and to seek input from others qualified to help, as appropriate:

• Does it comply with the law?
• Does it comply with our rules, policies and procedures?
• Is it consistent with our Vision and Values?
• Who will be affected?
• Have I evaluated alternatives, and do I understand the consequences of each?

• How would my supervisor, co-workers, family or close friends view it?
• How would I feel if information about this were made public?
• Am I comfortable with it?

If you’re still unsure whether you are making the right decision, discuss your concerns with your supervisor, the manager to whom your supervisor reports, or any of the contacts listed at the end of these Standards.

REPORTING AND HANDLING OF VIOLATIONS

When reporting concerns, employees should provide the information that is available to them, and should not engage in their own investigation, or taking of videos, audio recordings or photographs. Instead, please allow those who are authorized to conduct all information gathering.

If reporting anonymously through the EthicsHelpline, be sure to provide enough information to allow the matter to be properly investigated. Our EthicsHelpline can protect your anonymity while interacting with you. Be sure to check back with the EthicsHelpline system to answer any questions posted requesting more information and to see the status of the matter.

NON-RETALIATION

PPL is committed to fostering an environment where employees feel comfortable speaking up. We do not tolerate any form of discrimination, harassment or retaliation against individuals raising a concern in good faith or toward employees who participate in the investigation of a concern. If you believe you have been retaliated against, promptly contact your Human Resources department or the department in your company responsible for ethics and compliance.
PEOPLE AND HUMAN RIGHTS

Workplace Health, Safety and Welfare

PPL is committed to the health, safety and welfare of its employees and of those with whom we do business. We promptly complete required training and immediately report unsafe situations. We follow applicable policies and guidelines on maintaining a workplace that is free from violence, weapons, dangerous conditions, smoking, drugs and alcohol.

Equal Employment Opportunity and Nondiscrimination

We treat all employees with fairness, respect and dignity and promote equal opportunity for all. We follow applicable policies and guidelines prohibiting discrimination, harassment, bullying or retaliation.

We want our employees to be fully engaged at work. We value individual differences and encourage different perspectives and ideas because we believe that diversity and inclusion are strengths that unlock our full potential and help us achieve our goals. We follow applicable guidelines on equal employment opportunity.

Human Rights

We respect the human rights of our employees and expect our suppliers to respect human rights as well, as described in subsidiary company policies required by our Supplier Code of Conduct. We support employees’ right to freedom of association as well as the right to form or join a union, bargain collectively, or engage in union activities.

Privacy and Personal Information

We are committed to protecting personal information of employees and those with whom we do business. We are committed to complying with all applicable privacy and data protection laws and policies, including the PPL Enterprise Information Security Policy. We do not access personal information of our customers or co-workers without a legitimate business reason.

ENVIRONMENTAL COMMITMENT

We all have an obligation to carry out our business activities in ways that preserve and promote a clean, safe and healthy environment. We abide by the environmental laws and regulations of the locations in which we operate.

CONFLICTS OF INTEREST AND USE OF COMPANY ASSETS AND RESOURCES

We avoid conflicts between our personal interests and our work responsibilities. Our goal is to avoid even the appearance of conflict. We promptly disclose potential conflicts of interest to our supervisor or to any of the contacts listed at the end of these Standards.

We understand that we owe PPL (including its subsidiary companies) a duty to advance its legitimate interest when the opportunity to do so arises. We protect all company assets and resources and use all company information properly. We do not use any company assets, resources, information, or our position at work for improper personal gain, and we do not compete with any PPL company. If we learn of a business or investment opportunity through the use of any company assets, resources, information, or our position at work, we understand that this is an investment opportunity for our company. We do not participate in such an opportunity personally unless preapproved in writing by our company through approval at the senior manager level or above.
We comply with all applicable guidelines and policies that address conflicts of interest, including the following policies of PPL Corporation: Conflicts of Interest and External Board or Officer Service.

We also comply with applicable laws and policies on information protection and information security, including PPL’s Enterprise Information Security Policy and we comply with our Insider Trading Policy and Guidelines.

**Gifts and Entertainment**

We make sure that offering or accepting gifts and entertainment to or from those with whom we do business does not result in a feeling or expectation of personal obligation or affect our business judgment, or even appear to do so. When offering or accepting gifts or entertainment, we never accept, offer or authorize gifts in the form of cash or certificates that can be exchangeable into cash. We use good judgment and act with moderation.

We comply with the Gifts and Entertainment provisions of the Conflicts of Interest Policy.

**Community Activities and External Organizations**

Volunteering our time in the communities we serve is an excellent way for us to make a difference and experience significant personal growth in areas such as leadership and communication skills, diversity awareness and team building. We may also serve as an officer or board member of external organizations. However, participation in external organizations can be time-consuming. We are careful to avoid conflicts of interest, and we follow these PPL Corporation policies: Political Activities and External Board or Officer Service.

**IMPROPER INFLUENCE**

We do not offer, give, solicit or receive any bribes or kickbacks. It is our goal to avoid even the appearance of improperly influencing others.

We offer no gifts or hospitality to government employees in the United States without approval from a company attorney, and we offer no gifts or entertainment to a foreign government official without approval from PPL’s Office of General Counsel. We comply with the following PPL Corporation policies: Political Activities and Anti-Bribery/Anti-Corruption.

**PROCURING GOODS AND SERVICES**

We make procurement decisions in the best interests of our company. We comply with all applicable procurement and related policies, avoid conflicts of interest at all times in our procurement decisions, apply objective standards for evaluating supplier proposals, and select suppliers based on merit. We are also committed to compliance with any applicable laws related to supplier diversity, and we do not unlawfully discriminate in the identification and selection of qualified suppliers.

**COMPETITIVE PRACTICES**

**Antitrust Laws**

We compete fairly on the basis of price, service and value and comply with applicable laws and regulations that are intended to allow customers to freely make choices in the marketplace without obstruction from improper conduct or agreements that would affect price, restrict volumes or reduce the number of suppliers of goods and services. In the United States, we comply with U.S. antitrust laws and anti-market manipulation rules of the Federal Energy Regulatory Commission and the Commodity Futures Trading Commission. In the U.K., we comply with competition laws. We comply with PPL Corporation's Antitrust Policy.

**Affiliate Relationships**

We are subject to requirements that are meant to make sure that relationships and transactions among PPL subsidiaries do not disadvantage customers of PPL’s public utility operations. We strictly follow these requirements, including appropriate accounting and cost allocation practices, and we comply with PPL Corporation’s Affiliate Relationships Policy.
CONFIDENTIAL INFORMATION
We respect and protect confidential business information of our company, customers and vendors. We comply with laws and applicable policies dealing with disclosure of confidential information and with protecting confidential information. We do not access confidential business information without a legitimate business reason. We comply with PPL’s Enterprise Information Security Policy.

FAIR DEALING
We deal fairly and honestly with governmental and regulatory bodies, customers, suppliers, competitors, peer companies, employees and anyone else with whom we have contact in our jobs. We never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. We comply with laws when gathering competitive information and use such information only for legitimate business purposes. We comply with PPL Corporation’s Fair Dealing Policy.

EMBARGOES AND TRADE SANCTIONS
We are committed to complying fully with the laws and regulations of the United States and the United Kingdom dealing with economic sanctions, including laws prohibiting transactions with certain countries, agencies and individuals.

GOVERNMENT RELATIONS

Communications in Contested Matters
In contested matters, we abide by applicable restrictions on communications with a government representative or regulator (such as a judge, commissioner, arbitrator, fact-finder, staff, etc.) without the other parties being present or knowing about it. We follow our Political Activities Policy.

Political Activities
We value and encourage citizenship. We are careful to comply with all laws on lobbying and political contributions. We do not use funds or assets of our company to make political contributions to candidates for public office or to political parties. In the United States, we track and report lobbying time. We follow these PPL Corporation policies: Conflicts of Interest and Political Activities.

INTELLECTUAL PROPERTY
We are aware of others’ intellectual property rights, including patents, trademarks, copyrights and trade secrets. We make sure we have the owner’s permission before we reproduce copyrighted material, share a copy of an electronic or other subscription with unlicensed users, use logos or other trademarks or disclose proprietary information.

ACCURATE RECORDS
We maintain complete and accurate records of all business transactions. We make full, fair and accurate disclosure in compliance with all applicable laws and regulations in all documents that we submit to the government or regulator, or that we communicate to the public. We retain records in accordance with applicable policy and law, including data protection laws.
RESPONDING TO EXTERNAL INQUIRIES

Media Inquiries
Each of our companies has designated certain people who are authorized to speak on its behalf to the news media. We follow applicable policies on media inquiries and refer all media inquiries to our company’s communications department.

Financial Inquiries
We direct all requests for information from the financial community and investors as follows:

• Requests from securities analysts, brokers or institutional investors are directed to PPL’s Investor Relations department.
• Requests for information from the U.S. Securities and Exchange Commission or other regulators are directed to PPL’s Office of General Counsel.
• Requests for information from individual shareowners are directed to Equiniti Trust Company, EQ Shareowner Services at 1-800-345-3085 or online at: shareowneronline.com.

SOCIAL MEDIA
We understand that our use of social media can pose risks to the confidential and proprietary information, reputation and brand of PPL Corporation or its subsidiary companies. We comply with PPL’s Social Media Policy.

USE OF PPL’S INDEPENDENT AUDITOR
We are committed to making sure that PPL’s independent auditor is independent in both fact and appearance. We obtain pre-approval from PPL’s controller and head of audit services prior to using PPL’s independent auditor, and we comply with PPL’s policy on Use of the Company’s Independent Auditor.

WAIVERS AND AMENDMENTS OF THE STANDARDS
It is not our practice to grant waivers of the Standards. For executive officers and directors of PPL, any waiver of the Standards may be made only by the board or by a board committee. We may periodically amend the Standards to enhance them or to ensure compliance with applicable law. We will promptly disclose significant amendments and waivers of the Standards as required by law.
Contact Information for Inquiries, Concerns and Allegations

ALL PPL CORPORATION SUBSIDIARIES

EthicsHelpline
1-800-550-9418 (U.S.)
https://pplethicshelpline.alertline.com

Global Chief Compliance Officer
610-774-6525

Corporate Human Resources
610-774-6387

LG&E AND KU ENERGY

LG&E/KU HelpLine
1-800-407-7185

WESTERN POWER DISTRIBUTION

EthicsHelpline
0808 234 4108 (UK)

WPD personnel may also report at
332120 (or 0117 933 2120)

*All helpline reports can be made anonymously.*