

# CODE OF BUSINESS ETHICS



Effective October 3, 2016





## A MESSAGE FROM OUR CEO

Our purpose at Duke Energy is to power the lives of our customers and vitality of our communities. How we bring that purpose to life matters. We need to accomplish it the right way, under the highest ethical standards using the Code of Business Ethics (CoBE) as a guide.

The CoBE is underpinned by our core values of safety, integrity and service and establishes our ethical obligation. We're committed to earning the trust and confidence of those we interact with every day. To do this, we must be truthful, transparent and genuine in our interactions with each other, our business partners, the communities we serve and the governmental agencies that oversee our business.

When each of us performs our work with the highest personal and professional integrity, we foster an organizational culture of ethical and operational excellence. We must not allow pressure for results to undermine our ethical commitments.

I ask you to speak up if you have a question or observe misconduct. In return, you can expect to be protected from any form of intimidation or retaliation.

Together as a team, we must hold ourselves to the highest standards of honesty and integrity, fulfilling our vision of leading the way to cleaner, smarter energy solutions that our customers value.

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## INTRODUCTION TO THE CODE OF BUSINESS ETHICS

At Duke Energy we're committed to doing the right thing. It's easier to do the right thing when every employee of Duke Energy, its subsidiaries and its affiliates accepts personal responsibility to act ethically and legally when representing the company.

We've set the standard for business conduct in this Code of Business Ethics (CoBE), a document that reflects our core values and sets expectations for our conduct with each other, our customers, investors, public officials, and business partners alike. Since one instance of a person failing to act with integrity can damage the company's hard-earned reputation, every Duke Energy employee must understand and adhere to the expectations in the CoBE. Use this document as a reference guide and contact a member of your management team, your HR business partner, the Ethics Office, or the EthicsLine if you have questions.

*Note: This document does not create a contract of employment or alter the at-will nature of any employee's employment in any way.*

## Our Core Values

Our culture is “the way things get done around here,” and it’s guided by our core values.

# SAFETY

Safety refers to the health and safety of everyone who works here, as well as our communities and the environment.

# INTEGRITY

Integrity is acting honestly and ethically, holding ourselves accountable and earning trust.

# SERVICE

Service means being agile and innovative in taking care of our customers and helping our communities prosper.

## Our Ethical Commitments

No matter what job we perform, we're each responsible for creating, promoting and maintaining an organizational culture that encourages ethical conduct and compliance with the law. Each of us must understand and comply with the expectations set in the CoBE.

### As a Duke Energy employee ... As a Duke Energy leader ...

#### I WILL ...

- Learn and understand the laws and regulations applicable to my job
- Be honest, transparent, fair and trustworthy in all work-related activities and relationships
- When unclear about what to do, seek advice from my supervisor or another member of my management team, my HR business partner, a member of the Ethics Office, or the EthicsLine
- Report actual or suspected ethical misconduct
- Cooperate with company investigations by providing complete and truthful information and related documentation
- Complete required training and periodic certification of compliance

#### I WILL ...

- Be an example for employees by modeling ideal ethical business conduct
- Provide employees with the tools they need to understand and support our core values
- Create an environment where employees feel comfortable discussing ethical issues
- Create and maintain a diverse and inclusive workplace free of harassment
- Promptly respond to requests for guidance and reports of misconduct, engaging investigators and other resources as needed
- Support active investigations by providing timely information and encouraging staff to actively participate
- Administer proper incentives to ensure ongoing compliance and appropriate disciplinary measures if misconduct is substantiated

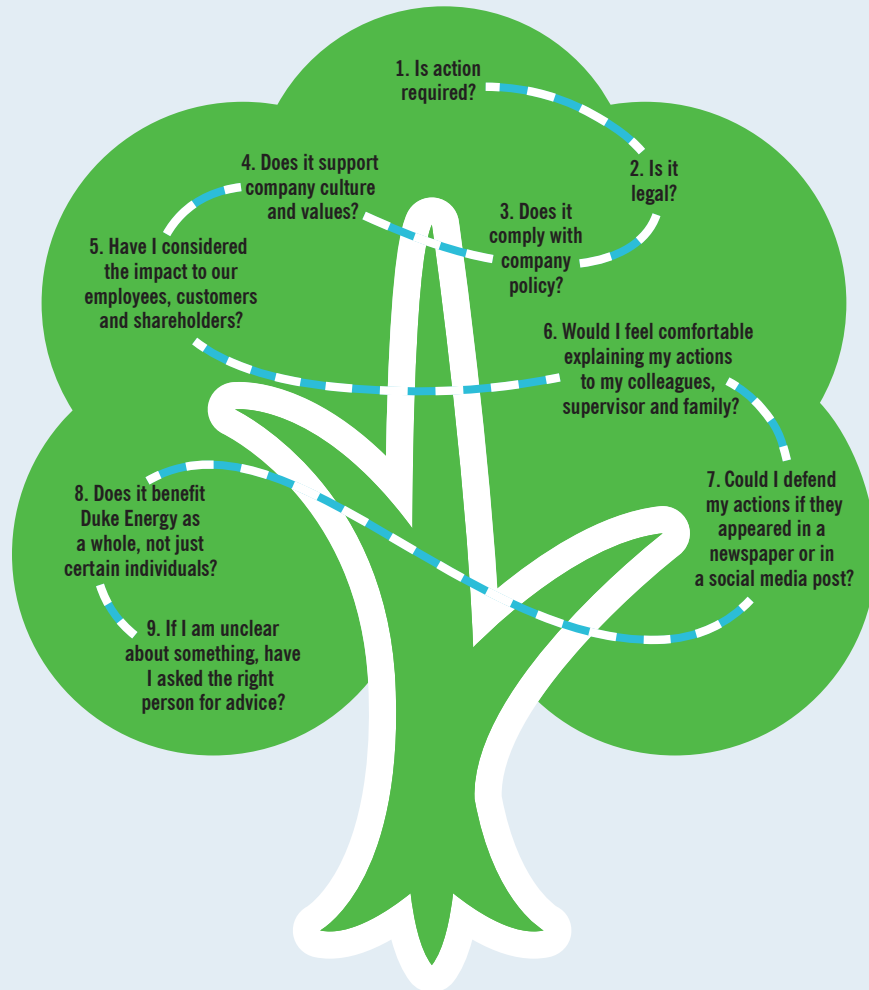
## Making the Right Decision

Even though we generally know the difference between right and wrong, sometimes the issues we face may not be black and white. We may encounter situations with conflicting priorities, such as choosing between a personal gain verses the right decision for the company. Making the right choice can sometimes be difficult, and it takes courage to act on our values, especially when the right choice isn't obvious.

Regardless of the situation, we are all expected to use sound judgment when making a decision on behalf of the company. Consider using this five-step process when facing a challenging decision.



In addition, it is impossible for the CoBE to cover every possible scenario. You may potentially encounter a situation not covered by the CoBE, a regulation or law, or company policy. Employees must accept personal responsibility for exercising appropriate behavior and maintaining high ethical standards. When in doubt, refer to the Ethical Decision Tree for guidance.



Start at number one and proceed through the questions. If you cannot comfortably answer yes to every question, do not proceed. Instead, seek guidance from your supervisor or another member of your management team, your HR business partner, a member of the Ethics Office, or the EthicsLine.

## Seeking a Waiver

Waivers of this Code of Business Ethics will only be granted for exceptional circumstances. Any request for a waiver must be submitted to the Chief Ethics and Compliance Officer, who will gain approval from the Audit Committee of the Board of Directors for any request by the Chairman, the Chief Executive Officer, any officer reporting directly to the Chief Executive Officer, the Controller or the Chief Ethics and Compliance Officer. Any waiver granted to one of these individuals will be disclosed in accordance with Securities Exchange Commission and New York Stock Exchange rules.

## Discipline for Non-Compliance

Employees and managers who do not comply with the requirements expressed in the CoBE will face discipline, up to and including termination of employment.

## Requesting Guidance and Reporting Concerns

As a Duke Energy employee, you're responsible for reporting actual or suspected violations of the CoBE and for seeking clarification and guidance on ethics, compliance and legal issues. To report an actual or suspected CoBE violation, or to seek guidance, you can contact:



If you are not comfortable with any of the options above, you can also report a concern:

- Online at <https://ethicsline.duke-energy.com>
- By calling the EthicsLine at **866.8ETHICS** (866.838.4427) in the U.S.
- By mailing a letter to the Ethics Office, P.O. Box 1333, Charlotte, NC 28201

The EthicsLine is a dedicated service maintained by a third-party vendor and is available 24 hours a day, seven days a week. Employees who contact the EthicsLine will be assigned a unique report and personal identification number (PIN) they may use to check on the status of reports and inquiries.

You can choose to remain anonymous when using the EthicsLine, but it is vitally important for you to keep your report number and PIN in a safe place so you can follow up on your concern or question. We may have follow-up questions about your concern, and you can assist with the investigation by calling or logging back in to the web submission tool to provide additional details. Without all of the facts, it may be difficult for us to get to the bottom of your concern or question.



## Investigation Process

### CONCERN DOCUMENTED

- Regardless of the way the concern is reported, it will be documented in our case management system.
- The concern will be kept confidential to the extent possible.

### INVESTIGATED BY A NEUTRAL PARTY

- Each case is investigated by an independent, neutral and trained subject matter expert.
- Under no circumstances will an investigation be conducted by, or under the supervision of, an individual accused of the activity under investigation, or who has had any involvement in the matter.

### INVESTIGATION COMPLETED

- Once the investigation is complete, the report is reviewed to ensure that all of the issues were thoroughly investigated.

### ISSUES ADDRESSED

- All substantiated concerns will be addressed through corrective action. Disciplinary action will be taken against an employee if necessary, though in many instances improved procedures can sufficiently resolve a problem.

### CASE CLOSED

- The case is closed in the case management system and a summary is communicated to the reporter. If reported anonymously through the EthicsLine, the reporter can use their report number and PIN to call or log back in to the web submission tool to obtain the summary.
- Details related to personnel actions are not shared in accordance with applicable employment laws.

### TRENDING & ANALYSIS OF SIMILAR CONCERNS

- Ethics activity is accumulated and evaluated on a regular basis to identify trends that need to be addressed. A summary report is provided to the Audit Committee of the Board of Directors.

In addition, material allegations regarding questionable accounting, internal financial controls (including internal accounting controls) and auditing matters, as well as material allegations involving senior management that could cause

Duke Energy significant reputational damage, will receive a special review and be promptly brought to the attention of the Audit Committee of the Board of Directors.

## Good Faith Reporting and Our Policy Against Retaliation

Duke Energy prohibits retaliation against employees who in good faith report concerns to management, Human Resources, the Ethics Office, the EthicsLine or regulatory agencies or who participate in the investigation or resolution of a concern. Good faith does not mean you are right about your concern, but it does mean you honestly believe it to be true. Knowingly making a false accusation is in itself a violation of this Code of Business Ethics.

The company will take appropriate corrective action against employees found to have participated in retaliation, up to and including termination of employment. If you believe you have been retaliated against, please contact the Ethics Office immediately so we may begin an investigation.

### What is retaliation?

Retaliation is when a supervisor, manager or a peer takes adverse action against an employee because they spoke up about a concern, whether the concern was reported to a manager, Human Resources, the Ethics Office, the EthicsLine or a regulatory agency.

## BUILDING TRUST WITH EACH OTHER

As a company, we are committed to creating and maintaining an inclusive work environment where the contributions of every individual are recognized, all people are valued and respected and all have opportunities to reach their full potential. We do not tolerate discrimination, harassment or retaliation in the workplace. Simply put, a positive, inclusive spirit drives everything we do.

### Equal Employment Opportunity

Duke Energy is an equal opportunity employer and does not discriminate against any employee or applicant for employment based on:

- Race
- Color
- Sex (including pregnancy and related conditions)
- Sexual orientation
- Gender identity or expression
- Religion
- National origin
- Medical condition
- Ancestry
- Ethnicity
- Citizenship
- Age
- Marital status
- Physical or mental disability
- Genetic information
- Military status
- Protected veteran status

As a company, Duke Energy is committed to recruiting, selecting, training and compensating based on merit, experience and other work-related criteria and will develop a diverse candidate pool when recruiting whenever possible. We will not make or act on presumptions about someone that are based on differences protected by law or company policy. Nor will we use any individual differences protected by law or company policy as a factor in any employment decision, or consider a person's complaint regarding unequal treatment when making an employment-related decision. We comply with all applicable federal, state and local laws, regulations and ordinances prohibiting discrimination in places where Duke Energy operates.

## Harassment-Free Workplace

Duke Energy is committed to creating and maintaining a culture where every employee can start each day with a sense of purpose and end each day with a sense of accomplishment. You should always be able to perform your assigned duties and responsibilities without being harassed by any other employee, supervisor, manager, contingent worker, customer, vendor or visitor. Duke Energy does not tolerate workplace harassment. You must speak up when workplace conduct makes you or others uncomfortable and promptly report perceived harassment to your supervisor or another member of your management team, your HR business partner, a member of the Ethics Office or the EthicsLine.

Any kind of harassing behavior weakens our culture and will not be tolerated, regardless of whether you are working at a Duke Energy facility or on assignment outside the company (e.g., conferences, storm duty, etc.).

### What is harassment?

Harassment is defined as any unwelcome conduct or behavior that singles out an employee because of the employee's race, color, sex (including pregnancy and related conditions), sexual orientation, gender identity or expression, religion, national origin, medical condition, ancestry, ethnicity, citizenship, age, marital status, physical or mental disability, genetic information, military status or protected veteran status.

## As a Duke Energy employee ...

### I WILL ...

- Treat others with respect and dignity any time and any place I represent the company
- Think carefully before making offhand comments or jokes and be sensitive to unintentionally offending others
- Promptly report perceived harassment to my supervisor or another member of my management team, my HR business partner, a member of the Ethics Office, or the EthicsLine

### I WILL NOT ...

- Engage in verbal or nonverbal threats, insults, abuse or ridicule (sexual or otherwise) or any other form of bullying or disrespect
- Possess, display or distribute offensive materials in any form such as cartoons, pictures, graffiti, paraphernalia or pornographic materials
- Make offensive remarks or slurs, including inappropriate jokes
- Make or attempt to make intimate, unwelcome or offensive physical contact including blocking normal movements
- Request or demand romantic or sexual favors, explicitly or implicitly, as a condition of employment, promotion, transfer or any other personnel action

### Offensive material includes:

- Content that is threatening, unlawful, abusive, harassing, defamatory, libelous, deceptive, fraudulent or invasive of another's privacy, and/or
- Any text, communication, software, image, sound, data or other information that leads to improper conduct (such as involvement with illegal drugs, illegal materials or illegal weapons) or that contains explicit or graphic descriptions or accounts of sexual acts.

### Legal Problems Outside of Work

Your conduct away from company property and outside of business hours could negatively affect the company and reflect poorly on your trustworthiness. Off-duty illegal activity may jeopardize workplace safety, the company's reputation or our ability to effectively serve our customers.

The company will assess the effect of any off-duty illegal activity on a case-by-case basis and take appropriate action.

### Health and Safety

At Duke Energy, we put safety first in all we do. Our goal is a zero injury and illness safety culture where Duke Energy employees and contingent workers demonstrate personal commitment to continuous safety improvement and to the safety of the communities we serve. Protecting our people enhances the quality of life for our workforce and contributes to our long-term business success.

Each of us must be committed to eliminating occupational health and safety hazards. Only through each employee's participation, ownership and engagement can the company achieve an injury- and illness-free workplace.

We believe in setting clear expectations, providing support and training, and holding employees accountable for understanding and incorporating health and safety responsibilities into daily work activities. We want you to return home safely each day.

### As a Duke Energy employee ...

#### I WILL ...

- Know, understand and comply with applicable health and safety rules and regulations, including the use of personal protective equipment
- Actively identify hazards, prevent and correct unsafe conditions, and demonstrate safe behaviors at every level
- Seek advice when I am unsure of how to perform a task safely
- Promptly report all health and safety incidents, including near misses, in accordance with department expectations

#### I WILL NOT ...

- Take short cuts that could endanger myself or the well-being of others
- Fail to promptly report or misrepresent the occurrence or severity of a safety incident

## Violence-Free Workplace

Duke Energy is committed to providing a safe and secure workplace with a zero tolerance for incidents of workplace violence committed by or against employees, contingent workers, vendors, customers or visitors. Prohibited conduct includes, but is not limited to, threats, physical abuse, stalking, vandalism, arson, or sabotage. Employees must practice safe and respectful behavior on company property and any time they are conducting company business, regardless of the location.

### Weapons

Our commitment to a violence-free workplace also includes zero tolerance for the possession of weapons on company property. Employees are prohibited from possessing weapons (including components that could be assembled to become a weapon) in company facilities, in company vehicles, or while conducting company business unless specifically authorized by Enterprise Protective Services.

Employees who violate this requirement will be subject to immediate termination, without progressive corrective action, regardless of the employee's intent.

### Terms to know:

**Weapon** – any object that is or could be used:

- In a threatening manner, or
- With the intent to inflict bodily harm, or
- To cause deliberate damage to and/or destruction of company property.

### Examples of weapons include, but are not limited to:

- Firearms: weapons capable of firing a missile (e.g., gun, pistol or rifle) or using an explosive charge as a propellant
- Explosives and incendiaries: devices, substances or chemicals capable of causing destruction by the act or instance of exploding or burning

**Possession** – refers to handling a weapon in any manner while on company facilities, in company vehicles, or while conducting company business, unless specifically authorized. For example, “possession” would include removing a lawfully stored weapon from an employee’s personal vehicle, or having the item on your person or in your belongings.

## Securing Our People, Property and Assets

As a company, we have implemented strict practices to control access to our premises to protect individuals and company assets. These practices are designed to ensure access is based on actual business needs and to minimize any adverse safety or security impact. Our security standards set minimum requirements for preventing, responding to, and recovering from physical incidents.

We must also be on the lookout for unusual or suspicious behavior, which could indicate a threat of theft, terrorism, commercial espionage or sabotage, or violence. If you witness behavior by a stressed co-worker or someone else you work with that seems erratic or unsafe, you should report it. It is extremely important to understand that these behaviors do not necessarily mean a person will become violent, but they may indicate the person is experiencing high levels of stress or seeks to harm the company.

Always take particular note and seek assistance from Enterprise Protective Services or your HR business partner if:

- You observe a significant change in the behavior patterns of a co-worker or business partner
- The frequency and intensity of the behaviors are disruptive to the work environment
- The person is exhibiting several unusual behaviors

Behaviors that indicate a co-worker may not be effectively managing stress include:

- Excessive absenteeism or lateness
- Disregard for the health and safety of others
- Increased mistakes or errors or unsatisfactory work quality
- Refusal to acknowledge job performance problems
- Faulty decision-making
- Testing the limits to see what they can get away with
- Overreacting to criticism
- Intimidating behavior

## As a Duke Energy Employee ...

### I WILL ...

- Act in a manner that promotes a safe and respectful workplace for all employees
- Report any conduct, behavior or communication that is violent or may lead to workplace violence
- Comply with all applicable laws and regulations regarding the storage, possession and use of firearms and other weapons in personal vehicles while on company property

### I WILL NOT ...

- Possess any firearm or other weapon on company property or while engaged in Duke Energy business, unless permitted by applicable law or other company policy
- Harm or threaten others with a firearm or other weapon
- Engage in incidents or threats of workplace violence or intimidation on company property or while conducting company business, regardless of the location

## Alcohol and Drug-Free Workplace

We have an obligation to each other to work safely so we can rely on one another to achieve superior results. All Duke Energy employees are expected to report for work and remain at work in a condition free of the effects of alcohol or drugs and be prepared to work together safely to perform our assigned duties. The use of illegal drugs, alcohol, or prescription medications that impacts job performance, corporate reputation, corporate assets, or the safety of workers or the public will not be tolerated.

## As a Duke Energy Employee ...

### I WILL ...

- Report to work fit for duty and free of the effects of illegal drugs and alcohol
- Report any actual or suspected on-the-job alcohol or illegal drug use
- Cooperate in all drug screening activities required by law or company policy

### I WILL NOT ...

- Possess, use, sell, arrange for the sale of, manufacture, dispense or transfer illegal drugs, illegally obtained prescription drugs or alcohol on or off company property while conducting company business
- Consume alcohol on the job, during working hours (including meal breaks) or when on call
- Appear for or return to work in an impaired state

## Personal Investment Decisions

As a Duke Energy employee, you are subject to rules that prevent you from making certain kinds of financial transactions. You must be careful when buying or selling securities – even the Duke Energy stock in your retirement account – to make sure you do not make trades when you know about significant decisions or financial results that have not been disclosed to the public. Before trading any stock or other security, you should consider whether you have access to material nonpublic information, about Duke Energy or another company we do business with, which would affect a reasonable investor's decision to make a trade.

## As a Duke Energy Employee ...

### I WILL ...

- Allow approximately two full trading days after any material nonpublic information of which I am aware has been made available to the public before trading Duke Energy securities
- Contact the Legal Department if I have questions relating to insider trading laws

### I WILL NOT ...

- Trade Duke Energy or its business partners' securities if I have access to material nonpublic information
- Provide material nonpublic information to anyone inside or outside Duke Energy who is not authorized to have that information

## Conflicts of Interest

As Duke Energy employees, we each have a responsibility to be loyal to the company and avoid actual or perceived conflicts of interest. A conflict of interest occurs when you have to choose between what is in your best interests (financial or otherwise) and what is in the best interest of the company.

The best way to reduce or remove a conflict and avoid a misunderstanding is to disclose any situation that has the potential to be misinterpreted by others, including other employees, customers, suppliers, shareholders and public officials. If you have questions about a conflict of interest situation, talk to your supervisor or call the Ethics Office to determine whether you need to disclose the potential conflict or seek approval from a member of the Executive Leadership Team based on the circumstances.

## As a Duke Energy Employee ...

### I WILL ...

- Understand and promptly disclose situations where I have an actual or potential conflict of interest
- Act in the best interests of Duke Energy any time I am asked to make a decision on behalf of the company
- Seek approval from a member of the Executive Leadership Team and the Ethics Office for certain employment and business transactions

### I WILL NOT ...

- Personally profit from an opportunity available to Duke Energy that I discover using company assets, information or my position at the company
- Personally benefit from a supplier selection or other business decision made on behalf of the company
- Participate in the selection process or oversee the work of a business in which I, or someone I have a close personal relationship with, is employed or has an ownership interest



While it's impossible to list every scenario, here are some common situations that could create a perceived or actual conflict:

TYPE OF CONFLICT	WHAT IT IS	WHAT IT WOULD LOOK LIKE
<b>Doing business with family and friends</b>	You, a member of your family or anyone with whom you have a close, personal relationship is employed by or owns more than 5 percent interest in an entity that does business with Duke Energy.	Your brother-in-law is hired as a partner in a law firm that you engage to work on Duke Energy matters.
<b>Competing employment</b>	<ul style="list-style-type: none"> <li>You, a member of your family or anyone with whom you have a close, personal relationship: <ul style="list-style-type: none"> <li>Is employed by or owns more than 5 percent interest in an entity that competes with Duke Energy.</li> <li>Takes a position on a board of directors for an organization that does business with Duke Energy.</li> </ul> </li> <li>You have outside employment similar to your current job responsibilities that may interfere with your ability to meet the requirements of your Duke Energy position.</li> </ul>	<ul style="list-style-type: none"> <li>Your son owns a startup renewable energy firm that competes for contracts to operate wind farms in the Southwest.</li> <li>You are asked to take a position on the board of your local electricity co-op.</li> <li>You continue to work for your previous employer as a contingent worker doing similar work to your role at Duke Energy.</li> </ul>
<b>Outside benefits</b>	You, a member of your family or anyone with whom you have a close, personal relationship receives outside benefits as a result of your position with Duke Energy (such as free or discounted goods or services not available to all employees, access to membership clubs or free use of a vacation property).	<ul style="list-style-type: none"> <li>A general contractor who you hired to do construction work at your Duke Energy work site offers to redo the master bathroom at your house for free, so long as you pay for materials.</li> </ul>
<b>Corporate opportunities</b>	You have access to company information that you use for a personal benefit and/or to compete with the company.	<ul style="list-style-type: none"> <li>You are aware of the intentions to build a new facility, so you personally purchase the land with the intent to lease it back to the company.</li> </ul>
<b>Personal relationships</b>	You supervise the work of an employee or contingent worker with whom you have a close, personal relationship.	<ul style="list-style-type: none"> <li>Your roommate, a contingent worker who works for a contract company, is assigned to a project under your oversight.</li> </ul>

## BUILDING TRUST AMONG OUR BUSINESS PARTNERS

Duke Energy builds relationships based on trust and respect with our customers, investors, suppliers, public officials and all of our stakeholders. To earn this trust, we conduct business legally and with integrity.

We do not participate in unfair or corrupt business practices and have zero tolerance for bribery. We succeed in the marketplace by offering competitively priced, quality products and services and comply with antitrust and other laws prohibiting activity that reduces competition and restricts trade.

### Who We Work With and Why

Our vendors and suppliers are integral to the success of our company, and we choose our partners carefully. Our decision to select a supplier is based on fair and objective criteria, such as technical, commercial, or other valid business reasons. In addition, we expect our suppliers of goods and services to share and adhere to our core values and apply them to the way they do business in the United States and around the world.

Contingent workers, suppliers and vendors are expected to support ethics and compliance programs within their own organizations and adhere to the Supplier Code of Conduct. This expectation includes a prohibition against any kind of child labor, forced labor, physical punishment or abuse. We respect the rights of all humans, and we expect our partners to do the same.

Through our commitment to supplier diversity, we build relationships with small, local, and diverse businesses capable of providing commodities and services at competitive prices. We are committed to building bridges with these businesses by providing equitable opportunities to compete. We believe these efforts can have lasting positive effects on economic development locally, regionally, and nationally. We aim to establish long-lasting “win-win” relationships that create value for all stakeholders.

## Bribery and Corruption

We will not engage in any kind of corrupt activity, nor tolerate such activity committed by a third party on our behalf. This means we will not pay, give or offer to provide anything of value in order to illegally influence future business decisions, obtain illegal advantages over other parties, or reward another party for past illegal actions. We comply with U.S. and international anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA). We do not offer or accept bribes, kickbacks, illegal gratuities or similar payments, and we will never punish an employee for refusing to pay a bribe, even if it results in lost business.

In addition, our prohibition against corrupt payments and activities includes bribes, kickbacks, or facilitation payments offered or made to individuals in the private sector or domestic public officials.

### As a Duke Energy Employee ...

#### I WILL ...

- Seek guidance about the laws that apply when visiting or beginning business in a new country or international territory
- Avoid making a facilitation payment, and seek assistance and approval from the Legal Department if such a payment is absolutely necessary
- Conduct appropriate due diligence when engaging a third party to conduct activity on our behalf
- Promptly report any requests for payments, gifts or other improper exchanges to the Ethics Office

#### I WILL NOT ...

- Offer, promise or authorize anything of value directly or indirectly to a government or foreign official if there is reason to believe the expenditures will be used illegally
- Do business with others who do not share Duke Energy's commitment to corruption-free business practices
- Overlook or ignore red flags that could indicate corrupt activity taken on our behalf by a third party

### Terms to know:

**Bribe:** Anything of value, including money, gifts, services, or favors, given with the intent to persuade someone to act in your favor.

**Kickback:** A payment made as a reward for facilitating a business agreement or relationship.

**Facilitation payment:** A payment made to expedite a legally provided service or request.

## International Laws

When doing business outside of the U.S., you must know and follow the laws of the country you are working in as well as any U.S. laws that may apply, some of which are listed below.

LAW OR REGULATION	DESCRIPTION
Anti-corruption laws	Legislation in the U.S. and many countries where Duke Energy operates make it a crime to promise, offer or give anything of value to a government official or a political party or candidate in order to obtain or retain business or gain any improper advantage.
Anti-boycott laws	Anti-boycott laws make it illegal to cooperate in any boycotts between foreign countries if the boycotts are not sanctioned by U.S. law.
Treasury embargo sanctions	The Treasury Department's Office of Foreign Assets Control prohibits U.S. companies and their foreign subsidiaries from doing business with certain countries, agencies and individuals. Regulations vary depending on the country and the type of transaction.
Export control restrictions	To prevent sensitive goods, technology and software from falling into the wrong hands, exports of items sensitive to certain countries and individuals may be restricted or prohibited. These restrictions and prohibitions also may apply to transfers between Duke Energy and its foreign subsidiaries.

Because the legal requirements are varied and complex, employees responsible for work outside the U.S. should seek training and ongoing legal advice regarding payments, record keeping and export control restrictions. Contact the Legal Department with questions regarding these and other local laws, regulations and conventions governing international business relationships.

## Business Courtesies

Business courtesies are designed to build good will and sound working relationships among business partners, but should never be used to gain special advantage in a relationship. Although a modest exchange may be acceptable under certain conditions, it's never required for doing business with Duke Energy and you must never give or accept business courtesies of any kind that could be reasonably viewed as inappropriately influencing a business decision or creating a business obligation on the part of the recipient.

### What's Acceptable

Small or nominal promotional items, gifts and entertainment given in the regular course of business are acceptable. However, care should be taken to not accept business courtesies on a frequent or continual basis. Never accept cash or cash equivalents (gift cards) or discounts not available to all employees. You should also exercise particular caution when negotiating or considering contracts. It is important not to give the impression of any connection between any business courtesy and a business opportunity.

### Exchanges with Public Officials

Special rules apply to business courtesies given to political candidates, government-affiliated employees and public officials. If you work directly with public officials you must take extra care to follow laws and company policies covering the acceptable exchange of business courtesies. You should consult with Governmental Affairs before offering a business courtesy to a political candidate, government-affiliated employee or public official. Please refer to the Building Trust with Governments section for more information about interacting with public officials.

### Terms to know:

**Business Courtesy:** Anything of value for which the recipient does not pay fair market value, including gifts, services, travel, accommodations and entertainment.

### Public Officials and Government-Affiliated Employees:

Employees or representatives (elected or appointed) of:

- Foreign, federal, state and local governments (i.e., executive, legislative or judicial branches)
- Government-owned, sponsored or affiliated companies
- Regulatory commissions
- Other entities with oversight over Duke Energy or any of its affiliates

## As a Duke Energy Employee ...

### I WILL ...

- Offer and accept only business courtesies that are customary, reasonable, legal and of modest value
- Complete a business courtesy log for all courtesies exceeding US\$100 value received from a business partner (other than meals), and any courtesy exchanged with a foreign official or union representative
- Obtain documented approval from my supervisor prior to accepting a business courtesy of significant value (greater than US\$300 value)
- Seek advice if unsure whether a business courtesy involving a supplier or other business partner is acceptable

### I WILL NOT ...

- Give or accept any gift, entertainment or other business courtesy that may be perceived by others as an attempt to influence a business decision
- Solicit gifts, favors, travel or entertainment from a supplier or other business partner
- Allow a supplier or other business partner to pay for my overnight travel without prior documented approval from a member of the Executive Leadership Team
- Accept cash, or a cash equivalent such as a gift card, from a supplier or other third party
- Agree to provide payments, contribute to charities, or make political contributions or other payments in return for favorable treatment

### Questions to ask yourself:

- Is this exchange infrequent and of modest value?
- Is the exchange customary and a part of normal business practices?
- Would the business courtesy be appropriate to reciprocate in a similar manner at company expense?
- Is the exchange free from any real or perceived special treatment, such as free services or special discounts?
- Will the exchange create a sense of obligation on the giver or recipient?
- Could the courtesy be perceived to inappropriately influence the recipient's business judgment?

### Fair Competition

At Duke Energy, we believe in doing business honestly and transparently. We will always participate in the marketplace fairly and lawfully, and we prohibit activities that reduce competition and restrict trade such as agreeing to fix prices, rigging bids, or dividing market territories. We will not engage in any activity that disrespects our competitors, nor will we make inaccurate statements about their products or services or our own.

### Fair competition laws may apply to your job when you are:

- Dealing with competitors
- Participating in industry associations
- Dealing with customers
- Dealing with suppliers
- Collecting competitive information

If your job puts you in any of these situations, you must know and understand what activities may be deemed a violation of antitrust and other laws protecting competition.

In addition, we only gather competitive intelligence through legal and honest means. If a new employee joins Duke Energy from a competitor, we will not ask them to share confidential or sensitive information they learned at their previous employer. We will not resort to any deceptive or manipulative practices nor use any unacceptable sources, including but not limited to:

- Confidential documents
- Documents that were not shared willingly
- Communications not intended for Duke Energy

### As a Duke Energy Employee ...

#### I WILL ...

- Seek advice from the Legal Department before sharing confidential proprietary information with a competitor through an industry association or other means
- Comply with company policies and procedures governing the procurement process
- Report any anticompetitive activity to my supervisor or another member of my management team, my HR business partner, a member of the Ethics Office, or the EthicsLine

#### I WILL NOT ...

- Enter into agreements with competitors on contract, material, or product pricing, territories, market share or intent to bid (or not bid) for particular business
- Enter into exclusivity agreements with suppliers in markets in which Duke Energy has market power
- Provide inconsistent information about a request for proposal to competing bidders or divulge a quote from one supplier to another supplier
- Take advantage of market power to eliminate or threaten a competitor or potential competitor in that market
- Participate in collusion by any trade association or other industry group regarding membership restrictions, sharing information or desired governmental actions to facilitate coordinated behavior to restrain competition

## Intellectual Property

Intellectual property is a creation or innovation used in business. Restricting the use of intellectual property helps the company protect its ideas and brand identity. We all have a responsibility to secure our intellectual property and respect the same of others. We must abide by all laws and regulations related to intellectual property, copyrights, patents, trademarks and trade secrets.

INTELLECTUAL PROPERTY	Denotes the legal rights that may be secured in virtually any creation of the human mind or intellect (for example, an idea, invention, machine, device, process, program, software, drawings, blueprints, name, logo or slogan) or that may be legally protectable (such as a patent, copyright, trademark, service mark and/or trade secret).
COPYRIGHTS	Protect original and tangible works of authorship such as books, brochures, reports, proposals, advertisements and other literary works, as well as works of art, drawings, photographs, videos, maps, charts, musical works, audiotapes and software. Copyrights prevent others from copying the particular fixed expression, but they do not protect the underlying idea.
PATENTS	Protect new and non-obvious inventions, such as machines, apparatus, devices, manufacturing components, chemical compositions, business processes and methods and ornamental designs.
TRADEMARKS AND SERVICE MARKS	Words, phrases, symbols and designs that identify and distinguish the sources of goods or services from those of others.
TRADE SECRETS	Any information used by a business such as formulas, processes, devices, and customer lists that have economic value because they are not generally known or easily discovered by observation or examination, and for which reasonable efforts have been made to maintain secrecy.

## As a Duke Energy Employee ...

### I WILL ...

- Report any unauthorized use of a Duke Energy copyright, patent, service mark or trademark to my supervisor or another member of my management team, my HR business partner, a member of the Ethics Office, or the EthicsLine
- Obtain permission to use a third-party's trademark, service mark or other intellectual property
- Follow the terms of any license agreement allowing the use of a third-party's patented invention
- Share with the company any intellectual property I create in the performance of my job to ensure adequate protection

### I WILL NOT ...

- Copy or distribute software without first ensuring it is permitted by a licensing agreement
- Make copies of copyrighted materials without permission or a determination that limited copying is legally permitted
- Use Duke Energy's copyrights, patents, service marks or trademarks without authorization

## BUILDING TRUST WITH OUR COMMUNITIES

Duke Energy proudly serves our communities by protecting our environment, using company assets prudently, safeguarding sensitive information in our possession, and speaking honestly and transparently about our business. We recognize the impact we have on a local, national and global scale, and we regularly work with various stakeholders to improve the quality of life in the communities we serve.

### Preserving Our Environment

We are committed to being a good neighbor, which means we respect and honor our role as a steward of our environment. Sustainability is central to everything we do, and responsible management of our natural resources is critical to a cleaner environment, the quality of life in the communities we serve and Duke Energy's long-term business success. We must all demonstrate a personal commitment to protecting the environment.

We strive to be a leader in the transition to cleaner energy solutions, and we are committed to realizing a more efficient and modernized grid to reduce our carbon emissions and other impacts on the environment. Every day we work hard to comply with state and federal regulations in order to protect people and the environment.

Some of the ways we demonstrate our commitment to the environment include:

- Utilizing energy efficiency programs to provide our customers with targeted insights to help them take actions to reduce their energy consumption
- Continuing to invest in clean energy generation and renewable energy sources
- Sponsoring or supporting numerous employee volunteer projects throughout our footprint
- Providing donations of time, money, and resources to local environment-focused nonprofit organizations

- Soliciting feedback and input from a diverse range of customer, community, environmental and business groups
- Selecting business partners based on their shared respect for and commitment to the environment

### As a Duke Energy Employee ...

#### I WILL ...

- Know, understand and comply with applicable environmental rules and regulations
- Support sustainability efforts at my job site and in my community
- Promptly report all incidents or near misses in accordance with department expectations

#### I WILL NOT ...

- Take short cuts that could knowingly result in damage to our environment or violate environmental procedures
- Misrepresent the occurrence or severity of an environmental incident
- Allow my required trainings or certifications to lapse

### Protecting Company Resources

Providing safe, reliable service to our customers and communities is one of our highest priorities, and the resources needed to accomplish this goal are enormous. We must be prudent when spending company money and protect company assets from loss, damage, unauthorized or improper use and waste.

Company resources should always be used responsibly and for legitimate business purposes. However, it is acceptable to use company telephones, computers and other assets for incidental and infrequent personal use so long as you don't abuse the privilege.



### Company resources include:

- Tools, equipment and machinery
- Information, including sensitive information
- Facilities
- Vehicles
- Office and field supplies
- Cellphones
- Computers and other technology systems
- Work time
- Other assets owned, leased or maintained by the company to conduct company business

### As a Duke Energy Employee ...

#### I WILL ...

- Work all hours reported on time sheets
- Follow applicable procedures when disposing of surplus or obsolete property
- Report actual or suspected theft, damage or unauthorized use of company property

#### I WILL NOT ...

- Use company resources for my personal benefit in a manner that creates additional costs for the company, interferes with work duties or violates company policy
- Use company property or information for illegal activities or personal gain
- Facilitate or approve a personal loan to or for any Duke Energy executive, officer or board member

## Sensitive Information

The information we gather during business operations is critical to our success and the security of the assets we operate. It is also an essential component of our business value and brand identity. We all have an obligation to guard sensitive information closely and protect it against unintentional disclosure and internal or external threats.

In addition, we are committed to protecting the personal information of our workforce, our customers and our shareholders. We must comply with laws to prevent, detect and respond to the theft or unauthorized use of personal information. Employees with access to sensitive information must protect it from intentional or accidental disclosure. You should carefully restrict physical and electronic access to sensitive information and only share it with others who have an approved business need to know.

### Examples of sensitive information include:

#### *Confidential and Proprietary*

- Nonpublic operational or financial results
- Customer information
- Unreleased plans or forecasts
- Supplier negotiations, pricing and specifications
- Information regarding financing negotiations
- Formulas, designs and other inventions covered by a patent, copyright or trademark

#### *Personal*

- Social Security numbers
- Driver's license, state ID or passport numbers
- Credit card and bank account numbers and personal identification number (PIN) codes
- Protected health information

## As a Duke Energy Employee ...

### I WILL ...

- Understand the definition of sensitive information as it applies to my work and take steps to reduce the risk of data loss or exposure and security breaches
- Exercise caution when discussing sensitive information in public areas within and outside the workplace
- Protect network passwords and other security protocols from disclosure
- Promptly report a lost or stolen computer, cellphone or other portable device
- Notify IT of any unusual activity involving information systems and associated resources

### I WILL NOT ...

- Disclose sensitive information to co-workers or third parties who are not authorized to receive or have no need to know the information
- Use sensitive information for personal benefit or for the benefit of persons outside of Duke Energy
- Use health information for any purpose other than the administration of health plans or to satisfy regulatory requirements
- Share my network password or other security protocols with others
- Download or install software that has not been approved for company use by IT

## The Duke Energy Brand

Our brand and reputation are some of our most valuable assets. The misuse or loss of such assets could have a serious financial impact on the company. We must each take steps to secure the integrity of our brand, and live up to the reputation for excellence it represents.

### Communicating with the Public

One way we protect the Duke Energy brand is by releasing company information only through authorized publications and spokespersons.

Unauthorized and inappropriate releases of information to the public can result in violation of full disclosure laws, stakeholder confusion and damage to Duke Energy's competitive position, brand and reputation. We are committed to communicating with the public truthfully, consistently and transparently, and only authorized spokespersons should provide information on behalf of Duke Energy. If you receive a request for comment from the media, contact the Corporate Communications Department.

### Social Media

Social media is continually changing the communication landscape and is a great way to learn, find resources, share ideas, gather feedback and test concepts. Employees are encouraged to exchange ideas, viewpoints and best practices via our internal social media platforms. We also support participation in online conversations through external social media tools, so long as it doesn't interfere with your work obligations or violate our internet security policies.

As a rule of thumb, use good judgment and be courteous, professional and respectful of others at all times when using both internal and external social media tools. And as with other forms of communication, make sure you indicate that comments related to the company are your own personal opinion and do not necessarily represent the views of the company, unless you're authorized to speak on the company's behalf.

Discussing or sharing proprietary information, trade secrets or nonpublic information related to the current or future performance of the company on social media is strictly prohibited. Employees should not disclose the personal information of others, including their photograph or likeness, without having first obtained their permission. The posting of false, inaccurate or misleading information regarding Duke Energy and its employees, agents, and contingent workers/contractors is also strictly prohibited.

### Tips for using social media

- When talking about Duke Energy, be clear about your association with the company and make sure your statements align with our core values
- Refrain from engaging in negative, disrespectful or harmful conversations
- Remember that social media posts can potentially be seen by the whole world and remain on the internet forever – think before you type
- Do not disclose proprietary, confidential or other types of sensitive information
- If responding to criticism, take the high road and stick to the facts

### As a Duke Energy Employee ...

#### I WILL ...

- Ensure all company documents are created in accordance with existing branding guidelines
- Gain approval before revealing company information to the public to ensure it is not confidential, proprietary, or protected for any other reason
- Communicate honestly and truthfully with the public

#### I WILL NOT ...

- Represent myself as a spokesperson of the company unless specifically authorized to do so
- Use company letterhead or company email when expressing a personal view in a public forum
- Allow the use of internal or approved external social media sites to interfere with my work duties
- Act in a way that could damage the Duke Energy brand or reputation, both on or off of company time or property
- Use company resources, including internet access, email, instant messaging and cellphones, to access or communicate offensive material

## BUILDING TRUST WITH GOVERNMENTS

In addition to those specifically discussed throughout the CoBE, Duke Energy is subject to numerous complex laws, rules and regulations. Violations of these rules – whether intended or not – can damage the company's operations, financial stability and reputation. That's why you must understand and comply with the letter and the spirit of the laws and regulations relevant to the work you do.

We are also committed to cooperating with the government and abiding by all laws that apply to our interactions with public officials. In addition, we must respond appropriately to any government inquiries or investigations.

### Laws and Regulations that Apply to the Company

Each of us contributes to the company's status as a conscientious, law-abiding corporate citizen. We rely on each other to ensure we meet the many legal and regulatory requirements imposed by the various regulatory agencies that govern our industry and protect the public interest. Core compliance practices based on a common set of tools and concepts are deployed across the business to prevent, detect and respond to potential violations of laws and regulations that apply to Duke Energy's operations. Individually, we are responsible for understanding the laws and regulations applicable to our jobs and the consequences of our actions. Intentional non-compliance is never an acceptable option.

Key regulatory compliance areas include:

#### FERC Compliance

The Federal Energy Regulatory Commission (FERC) is responsible for regulating the interstate transmission of electricity, natural gas and oil, as well as wholesale sales of electricity in interstate commerce. Under the Federal

Power Act, the FERC is authorized to issue regulations regarding wholesale sales of electricity and transmission and to enforce those regulations and laws. We maintain a comprehensive FERC compliance program to ensure we meet our obligations, including but not limited to:

- Affiliate Restrictions that govern the relationship between a regulated utility with captive customers and its market-regulated power sales affiliates.
- Standards of Conduct that govern the relationship between regulated transmission providers and their workers performing marketing functions.

#### NERC Compliance

The North American Electric Reliability Corporation (NERC) is a not-for-profit international regulatory authority, subject to oversight by the FERC, whose mission is to assure the reliability of the bulk power system in North America. NERC develops and enforces Reliability Standards, annually assesses seasonal and long-term reliability, monitors the bulk power system through system awareness, and educates, trains, and certifies industry personnel. Our NERC compliance program includes oversight of our obligations related to Critical Infrastructure Protection (CIP) and Operations and Planning (O&P) standards to formalize grid operations and ensure the security of physical and cyber assets essential to the reliable operation of the electric grid.

#### PHMSA Compliance

The Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA), acting through the Office of Pipeline Safety (OPS), administers the department's national regulatory program to assure the safe transportation of natural gas, petroleum, and other hazardous materials by pipeline and develops regulations and other approaches to risk management to assure safety in design, construction, testing, operation, maintenance, and

emergency response of pipeline facilities. Our natural gas compliance program provides oversight of our obligations related to federal and state regulations to ensure we deliver safe and reliable natural gas to our customers.

### Public Utility Commission Compliance

We comply with all state utility commission orders and regulations in the jurisdictions in which we operate to ensure fair consideration in the interest of the public through cost-effective rates, appropriate affiliate relationships, and future planning for safe, cost-effective and reliable service.

### Participating in the Political Process

Duke Energy strongly supports individual participation in the political process, including involvement with political parties, candidates and issues. We respect the right of individual employees to disagree with a company political position. If you choose to participate in political activities as an individual, you must use your own time and resources and not the company's.

### As a Duke Energy Employee ...

#### I WILL ...

- Clearly identify individual, personal political views as such and not those of Duke Energy
- Get approval from Government Affairs before using company funds or resources to contribute directly or indirectly to a public official, or to sponsor an event where a public official is an attendee, invitee, speaker or honoree
- Notify my supervisor and Government Affairs before making plans to campaign or serve in public office
- Excuse myself from decisions involving Duke Energy while serving as a public official

#### I WILL NOT ...

- Use company funds to provide a contribution, gift, meal, travel, entertainment or event ticket to a public official or his/her staff without approval from Government Affairs
- Contact government personnel to influence legislation, rule-making or policy on behalf of Duke Energy without involving Government Affairs
- Request company reimbursement for time spent supporting political candidates and issues or for personal political contributions
- Apply direct or indirect pressure on a co-worker to make a personal political contribution

## Interacting with Public Officials

As a company, Duke Energy regularly interacts with public officials responsible for laws, regulations, rules and policies that affect our company. Public officials are considered any government employees and representatives, including elected or appointed officials in foreign, federal, state and local governments, regulatory commissions and other oversight agencies. We must ensure that our interactions and relationships with public officials are professional and productive and comply with all related laws, orders, regulations and rules.

## Doing Business with the Government

When doing business with the government, it is important to remember that what is acceptable for other private sector partners may not be appropriate with government employees. For example, we may be prohibited from providing any type of courtesy, including meals and drinks, to certain government officials. Also, government contracts are subject to extensive regulations, so make sure you are aware of applicable rules prior to engaging in government bids or contracts. As with all other customers, be sure you conduct business with integrity and communicate honestly. You may also refer to the Building Trust with Business Partners section for information about business courtesies.

## As a Duke Energy Employee ...

### I WILL ...

- Notify Government Affairs prior to interacting with public officials if that is not part of my assigned responsibilities
- Abide by applicable ex parte rules when communicating with public officials
- Communicate with public officials in a courteous, professional and business-like manner
- Follow rules that apply to business courtesies given to public officials

### I WILL NOT ...

- Create or contribute to any situation where the responsibilities, judgment or objectivity of a public official becomes compromised
- Discuss potential company employment with a public official without first consulting with Human Resources
- Offer, promise or give anything of value to a public official to assist me or the company in obtaining or retaining business or to obtain any improper advantage

### What is an ex parte communication?

An ex parte communication is any oral or written communication that is not on the record, for any pending proceeding, where reasonable notice to all parties was not given. Ex parte communication is generally prohibited; however, communication regarding undisputed administrative or procedural matters and educational or informational communications when there are no other parties to the proceeding other than Duke Energy may be exempt from ex parte rules. When in doubt, contact the Legal Department prior to engaging in the communication.

## Accurate Reporting and Records

Every one of us, regardless of our position, has an obligation to make sure that the information we contribute to the company's operational, financial and other business records is complete, factual and timely. Whenever you create a record, make sure you include all required information and that the information is accurate.

We must also retain our business records in accordance with all laws, regulations, and company policies.

### What is a record?

A record is any information that has an ongoing value, such as something that documents a business decision or transaction and who participated, provides evidence of regulatory requirements or obligations, supports the ongoing operations of the business, or provides evidence of corporate history. Examples include:

- Timekeeping records
- Expense reports
- Inventory records
- Environmental reports
- Health and safety reports
- Quality assurance certifications

## As a Duke Energy Employee ...

### I WILL ...

- Adhere to proper practices related to the creation, disclosure, retention and destruction of business records
- Actively manage records and other information compiled in any media type, including paper and electronically stored information
- Follow records retention guidance and direction provided by company attorneys in the event of pending or anticipated litigation or regulatory inquiry

### I WILL NOT ...

- Retain records beyond the period defined in the applicable records retention schedule unless directed to do so by a company attorney
- Destroy, alter or falsify records or other materials after being notified by a company attorney that they should be preserved

## Fraud Prevention

Employees who intentionally misrepresent or conceal facts regarding our business or who assist others in doing so have engaged in fraud. Fraud compromises the integrity of our financial reporting and the safety of our assets. If you are aware of or suspect fraud, you must report it immediately to your supervisor or another member of your management team, your HR business partner, a member of the Ethics Office, or the EthicsLine.

## As a Duke Energy Employee ...

### I WILL ...

- Maintain books, accounts and records according to applicable legal and regulatory requirements, including Generally Accepted Accounting Principles (GAAP) requirements for financial records
- Record financial transactions and other business activity accurately and promptly, including time entry reporting
- Provide complete and accurate documentation of reimbursable expenses
- Provide complete and accurate information and related documentation during company investigations
- Report actual or suspected fraud immediately

### I WILL NOT ...

- Conceal or otherwise fail to disclose to management material financial or nonfinancial information that could impact the company's external reports and other communications
- Falsify personal credentials, documents or certifications required by company procedures and/or regulatory authorities, including providing my signature as a quality assurance check without completing the inspection process
- Manipulate financial or operational results to meet targets or goals
- Maintain off-the-books accounts for any reason, including to facilitate questionable or illegal payments
- Separate a single transaction into multiple transactions to circumvent delegation of authority

## What are some examples of fraud?

### *Fraudulent financial reporting*

- Intentional reporting of false expense or revenue data that improperly states amounts reported on publicly filed financial statements
- Intentional misstatement of price data reported for price index purposes
- Intentional misapplication of accounting principles relating to amounts, classification, accrual, manner of presentation or disclosure

### *Misappropriation of assets*

- Intentionally submitting an inaccurate expense report for personal expenses
- Excessive personal use of company supplies or assets
- Improper time reporting with intent to defraud

### *Corruption and other fraud-related misconduct*

- Overriding existing controls, rendering the controls ineffective
- Falsifying personal credentials
- Tampering with documents



## Responding to Requests for Information

We are committed to providing complete, accurate, and truthful information when responding to requests for information because it's good for business and it's the right thing to do. For example, audits of our operations and financial accounts and records ensure we are meeting our legal obligations, accounting for our finances in accordance with Generally Accepted Accounting Principles, and accurately reporting our financial standing to regulators, shareholders, and the general public. We must all cooperate during an audit and provide accurate information in accordance with our policies.

Various government agencies or entities may also request Duke Energy information and documents. Such requests may stem from a regulatory action, government investigation or litigation. The requests may be informal or may be presented by subpoena, search warrant or civil discovery documents. An understanding of the issues these requests raise and the immediate involvement of appropriate Duke Energy professionals are necessary in order to comply with the law, to secure appropriate protection of Duke Energy's rights and the rights of its employees, and to deliver accurate and consistent responses to these requests. If you receive such a request, contact the Legal Department immediately.