

FirstEnergy Corp. Policy 101

Code of Business Conduct

FirstEnergy Code of Business Conduct Introduction

We are a forward-thinking electric utility powered by a diverse team of personnel, consisting of both employees and contractors, committed to making customers' lives brighter, the environment better and our communities stronger.

The Board of Directors, in concert with the CEO and Executive Council, will lead the Company in updating, communicating and implementing FirstEnergy's mission.

The mission is supported by a set of core values, including safety, customers, diversity & inclusion, innovation, performance, social responsibility and teamwork.

Commitment to Maintaining the Highest Standards of Business Conduct

This Code of Business Conduct (the "Code") serves as a reminder of the high standards we must meet in our day-to-day business activities. It also helps to guide us when formulating and pursuing Company goals and objectives. The Code is not intended to cover all situations we might encounter on the job; its guidelines help reinforce our own good judgment and personal integrity in all our business activities.

FirstEnergy personnel are all responsible for complying with applicable laws and regulations and the principles and provisions included in this Code. Violations will be dealt with promptly, consistently and may result in disciplinary action up to and including discharge. You are encouraged to direct questions regarding proper business conduct to your supervisor. Normally, these questions will be answered and issues resolved at this level. When that is not possible, or when your supervisor requires additional guidance, the Chief Ethics Officer is available for consultation.

Supervisors are responsible for ensuring that everyone within their work group is familiar with the provisions of this Code.

Where to Go for Help and To Report Violations

FirstEnergy's Chief Ethics Officer is responsible for compliance oversight in relationship to the Code. The Chief Ethics Officer has been given the authority to resolve your questions regarding proper business conduct, except that waivers of our Code for our executive officers require consideration and approval by our Board of Directors or an applicable Board committee.

Known or suspected violations of laws, rules, regulations or this Code are serious matters and must be dealt with accordingly. If you become aware of or suspect a violation, you must report it immediately to your supervisor. Failure to report such violations, and failure to follow the provisions of this Code, may have serious legal consequences and may result in discipline by the Company. This reporting requirement includes any actual, potential or suspected violations of the securities laws (such as any accounting, investor or financial and financial reporting related matters).

Supervisors are obliged to follow up on all reported violations of law or this Code, and to alert the Chief Ethics Officer if an actual violation is suspected or confirmed. In the event a supervisor receives a report related to violations of the securities laws, the Chief Ethics Officer is to be alerted immediately whether or not an actual violation has been confirmed.

When confidentiality is a concern, you may personally direct reports of violations or other business conduct inquiries to the Chief Ethics Officer or use the Employee Concerns Line. A toll-free Employee Concerns Line (1-800-683-3625) and an online site (<https://secure.ethicspoint.com/domain/media/en/gui/71292/index.html>) are maintained outside the Company to ensure that we have an effective and anonymous means to report compliance issues in the event that other reporting methods are not chosen. The line is operational 24 hours a day, seven days a week and affords complete anonymity to callers.

This Employee Concerns Line is a service established by the Company and made available to you for reporting actual or suspected violations of this Code and other Company policies and practices. Staffed by an outside agency not affiliated with the Company, the Employee Concerns Line can be used to communicate your concerns by telephone or online instead of directly reporting them to your supervisor or the Chief Ethics Officer. When using this service, you will not be asked to identify yourself. You

will be able to use the Employee Concerns Line to obtain updated information on any actions taken by the Company with respect to your report.

By following the procedures described above, personnel assist the Chief Ethics Officer and the Company to take prompt, appropriate and consistent action against violations of this Code.

Using the Code of Business Conduct as Our Guide

No single book or code of conduct policy can provide answers to every situation. This Code is to be used as a guide for ethical conduct and help foster a culture of honesty and accountability. It is endorsed by FirstEnergy's Board of Directors and executives, communicates our culture of intolerance for retaliation, provides policy guidance, and concludes with a question and answer section.

Retaliation is Unacceptable

You may make use of the resources in this Code without fear of retaliation. It is unacceptable for anyone using these resources to be discharged, demoted, suspended, threatened, harassed, intimidated or negatively impacted, or in any other manner discriminated against in any way as a result of filing a good faith complaint or participating in an investigation of an internal discrimination complaint.

Supervisors are cautioned that any retaliatory or other personnel action taken against individuals as a result of their making a report or filing a complaint or otherwise participating in an investigation of a complaint or report under this policy shall in itself be treated as a violation of this policy and will subject the supervisor to discipline up to and including termination. As with any other personnel action contemplated by supervisors, personnel actions being considered with respect to anyone who has filed a complaint or made a report under this policy, the supervisor must seek further guidance from appropriate representatives within the Human Resources or Legal Departments in advance of taking such action.

If the Company confirms a violation of laws, rules, regulations or this Code, the Company will take corrective action against the offending

individual, including discipline up to and including termination of employment, as appropriate.

General Disclaimer

The policies, practices, and procedures set forth in this Code are for information only and may be changed at any time. This Code is not an employment or service contract or guarantee of employment or services, expressed or implied.

Guiding Principles of Business Conduct

It is the responsibility of every one of us to comply with all applicable laws, rules and regulations and all provisions of this Code and related policies and procedures. This Code is designed to encourage you to lead by example with ethics and integrity and engage in open, honest, direct and ongoing dialogue. In addition, our Company has adopted a Corporate Compliance Program (“Program”) to assist all business units and personnel to fully comply with all applicable laws, regulations and policies. The Program demonstrates that we intend to operate our business in accordance with sound business ethics. It includes many guiding principles for specific standards of conduct.

Relationships with Others

Fair Dealing - We have built a reputation as a trustworthy and ethical member of our community and our industry. We are committed to maintaining the highest levels of integrity and fairness within our Company. When we fail to negotiate, perform or market in good faith, we may seriously damage our reputation and lose the loyalty of our customers. You must conduct business, including dealings with the Company’s customers, suppliers, competitors and other personnel, honestly and fairly and not take unfair advantage of anyone through any misrepresentation of material facts, manipulation, concealment, abuse of privileged information, fraud, bribes, kickbacks, illegal payments, cash gifts, cash equivalent gifts or other unfair business practices. Also, please be aware that special rules apply when dealing with government employees. You should direct any questions about dealing with government employees to your supervisor.

Dealing with Customers - Strive to extend to our customers courteous and fair treatment. An honest effort must be made to satisfy their needs for accurate and complete information and to provide them timely and quality services of superior value consistent with established Company standards and practices.

Dealing with Each Other - You are encouraged to engage in professional debate, constructive feedback and straight talk on strategic issues and personal and organizational performance. You should provide open, mutual support and strive for team excellence by pulling together for the Company’s success and to support strategic issues once a decision is made. You are entitled to mutual respect. It is the policy of the Company to provide and maintain a work environment that is free from all forms of unlawful discrimination, including, without limitation, sexual harassment and harassment based on race, color, religion, gender, national origin, age, disability, ancestry, sexual orientation, veteran status, or any other protected characteristic under applicable law.

This Code extends to every phase of employment, including: recruiting, hiring, training, promotion, compensation, benefits, transfers, discipline, termination, layoffs, recalls, and Company-sponsored educational, social and recreational programs, as well as all phases of engaging contractors, as applicable. Members of management are responsible for encouraging appropriate workplace behaviors and reporting known or suspected policy violations. Any form of unlawful discrimination is a breach of respect that must be reported.

Q: You recently received an unsolicited “inappropriate” e-mail that you thought was very funny. You want to forward it to a friend who is a co-worker. Since this is a private joke between two friends, is it okay to forward this e-mail?

A: No. Our Company e-mail system is not to be used to send or receive this type of communication. If you are consistently receiving such material, request the recipients to stop sending it to you. All e-mails that you exchange with others, inside or outside of the Company, may be accessed and read by our Company at random. Further, e-mail transmitted on our network that violates any law or is deemed to be offensive may subject you to disciplinary action.

Dealing with Suppliers - Deal with our suppliers and other vendors in a fair and impartial way so that no supplier is given an improper competitive advantage over another. Strive to objectively evaluate vendors' offers for goods and services, and make buying decisions that are in the best interest of the Company and our customers from a cost, value and ethical perspective. Avoid soliciting our vendors financially to support any Company or personnel sponsored function where the Company or the personnel directly benefits. If a decision is made to accept such support offered by a vendor, it must be approved by the Chief Ethics Officer.

Conflicts of Interest - We should all be aware of any potential influences that impact or appear to impact our loyalty to FirstEnergy. A "conflict of interest" can occur when your personal interest interferes with – or may appear to interfere with – the interests of the Company as a whole, or when your personal interests make it difficult for you to perform your job duties objectively and effectively. Conflicts of interest also arise when personnel, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position with the Company. Avoid situations in which your personal interests are in conflict, or appear to be in conflict, with the interests of the Company or your job responsibilities. This includes the use of knowledge gained through your work activities to make decisions that will lead to personal gain and that are contrary to the law or the interests of the Company. This also includes financial relationships, including equity interests and loans to, or guarantees of obligations of, the party with the FirstEnergy relationship. Furthermore, the Company will not make any loans or guarantees to executive officers or their family members.

You also have the specific responsibility of understanding and abiding by the Company's expanded Conflicts of Interest Policy.

If you have or believe that you may have a conflict of interest with respect to outside work, financial interest or otherwise, you must immediately report this to your supervisor or the Chief Ethics Officer or through the Employee Concerns Line.

Q: Some friends of yours are starting an Internet company. You're planning to work evenings and weekends until it gets off the ground, at which point you'll quit your current job. As long as all work for this startup is done on your own time, would joining the company be a conflict of interest?

A: Your first responsibility is to perform your current job. If your job requires overtime, then you must be sure that your new venture does not interfere with this. Also, if your new venture is a potential competitor, consider waiting until you can afford to join them on a full-time basis. Because this situation represents a potential conflict of interest, you should discuss it with your supervisor, the Chief Ethics Officer, or utilize the Employee Concerns Line.

Q: Your job requires that you locate a vendor for a product needed in your department. Your supervisor has strongly suggested that you use a particular company that you know is owned by a relative of his. Is this a potential conflict of interest?

A: Yes. You should talk about this with your supervisor. Then, solicit bids as you normally would. Consider all of the factors in choosing the vendor. The supervisor must maintain an arm's length relationship in the matter. If pressure from this supervisor continues, speak with the Chief Ethics Officer, or utilize the Employee Concerns Line.

Corporate Opportunities - Personnel owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Corporate opportunities relating to the kinds of products and services we usually sell or the activities we typically pursue that arise during the course of your work or through the use of our property or information belong to the Company. Similarly, other corporate opportunities that fit into our strategic plans or satisfy our commercial objectives that arise under similar conditions also belong to the Company. You may not take personal advantage of any business or investment opportunity that you may learn about through your work for the Company and that the Company may want to pursue – unless and until the Company has had an opportunity to evaluate it and has chosen not to pursue it. Personnel are prohibited from: (a) taking for themselves personally, opportunities that are discovered through the use of corporate property, information or position; (b) using the Company's information, assets, or position for personal gain; or (c) competing with the Company for business opportunities. Also, you may not direct corporate opportunities to our competitors, to other third parties or to other businesses that you own or are affiliated with.

Protection of Corporate Assets, Including Corporate Funds - We have a responsibility to use Company assets efficiently and carefully and to protect them from loss, theft, misuse, waste and carelessness,

which have a direct impact on the Company’s profitability. Company assets and funds may be used only for legitimate business purposes and may never be used for illegal purposes. Do not keep undisclosed funds nor establish any undisclosed accounts while conducting your work. Do not knowingly cause corporate funds to be used for unlawful purposes or for purposes other than those described by the documentation supporting payment. If you become aware of theft, waste or misuse of Company assets or funds or have any questions about your proper use of them, you should speak immediately with your supervisor or the Chief Ethics Officer or through the Employee Concerns Line.

Q: You usually fill out your boss’s expense report. Occasionally your boss gives you receipts for dinner engagements and you know these were not business related. What should be your first step?

A: Remind your boss that it’s against Company policy to include the expenses. All financial reporting has to be accurate; our customers and shareholders depend upon it. Only legitimate expenses should be put on expense reports. Never falsify a Company document. If your boss insists on including the expenses, you should report the incident to the Chief Ethics Officer or the Employee Concerns Line

Confidential Information - All personnel must maintain the confidentiality of information entrusted to them by the Company and any other confidential information about the Company or its customers that comes to them, from whatever source, in their work capacity, except when disclosure is authorized or legally mandated. Examples of confidential information include, but are not limited to, client or customer lists, non-public financial information, contracts with customers, new or developing products and trade secrets. Our business relations are built on trust, and our customers and suppliers count on that trust. If you learn information from them that is not otherwise public, you should keep that information confidential also. For purposes of this Code, “confidential information” includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed.

Q: In a request received from a customer, you are asked to provide account balance information contained in Account X. Should you provide the information, no questions asked?

A: No. Personnel are prohibited from releasing any contents of an account before first verifying the requestor is the principal owner of the account. Disclosing this information to anyone other than the principal owner can result in a data loss violation.

Corporate Records - Information derived from our records is provided to our shareholders and investors as well as government agencies. Ensure you accurately record all financial transactions in a timely manner in accordance with prescribed accounting principles. Make full, fair, accurate, timely and understandable disclosure of financial and nonfinancial information as required by law and regulation, including reports we file with the Securities and Exchange Commission (the “SEC”) and other public communications. Never knowingly record false or misleading information on any Company record, report, or document, including those reports and documents submitted to any government agency, including but not limited to the SEC. Falsifying records or keeping unrecorded funds and assets is a severe offense and may result in prosecution or termination.

Corporate records, regardless of format, should be retained or discarded in accordance with our record retention policies and all applicable laws and regulations.

Q: You noticed a coworker charged the Company for time she took to go to a doctor’s appointment. What should you do?

A: Remind her she went to the doctor and advise her to fix her time sheet. All Company records, including time sheets, must be accurate. If she continues to abuse this situation, involve her supervisor or the Chief Ethics Officer, or report the incident to the Employee Concerns Line.

Political Activities - FirstEnergy participates in the political process through political action committees and lobbying activity to the extent permitted by law. Do not bring pressure on personnel, customers, suppliers or shareholders, etc. to contribute to, support, or oppose any political group or candidate.

Q: Your boss is a volunteer for a local political candidate’s campaign. He wants you to use the Company copier to duplicate twenty flyers. Is this okay?

A: No. Personnel may not work on a political campaign during working hours or use company facilities or property at any time for any political campaign purpose.

Environmental Commitment - You have an obligation to help FirstEnergy protect the environment by striving to perform your work in a manner consistent with established Company standards and practices and all applicable environmental laws and regulations.

Q: *Your department regularly uses chemical solutions during equipment maintenance activities. You learn that coworkers are discarding the used chemicals down the floor drain. Is this an environmentally-friendly practice?*

A: *No. Always check chemical and manufacturer instructions for proper and safe disposal of chemicals. Report any unsafe practices to the environmental or safety contacts at your facility.*

Fitness for Duty - You have a duty to help FirstEnergy meet its responsibility and commitments to the public welfare, to comply with state and federal regulations, and to ensure a safe work environment for all personnel, by coming to work free from the effects of alcohol, illegal drugs, or other drugs that may impair your judgement and ability to safely operate any equipment that may be required by your job responsibilities.

Q: *You observe a coworker who appears to be impaired. What should you do?*

A: Report your observations to your supervisor or through the Employee Concerns Line for appropriate action.

Compliance with the Law - Comply with both the letter and spirit of all applicable U.S. and foreign laws, rules and regulations, seeking any necessary clarifications from your immediate supervisor or the Legal Department. Do not knowingly take, or permit to be taken, any action on behalf of the Company that violates any law, rule or regulation. Acknowledge that you are expected to have an understanding of the applicable laws, rules and regulations that affect our work assignments.

Insider Trading - Because we are a public company, we are subject to a number of laws and regulations concerning the purchase and sale of our stock and other publicly traded securities, as well as laws and regulations concerning disclosure of Company information to anyone outside the Company. Regardless of your position with us, if you are aware of what is known as “material non-public information” regarding our Company, business, affairs or prospects, you may not disclose that information to

anyone outside our Company, and you are not permitted to buy or sell our stock or other publicly-traded securities of the Company until the material non-public information is known not only by individuals within our Company, but also by the general public. “

“Material non-public information” is any information concerning us that is not available to the general public and which an investor would likely consider to be important in making a decision whether to buy, sell or hold our stock or other securities. A good rule of thumb to determine whether information about us is material non-public information is whether or not the release of that information to the public would have an effect on the price of our stock. The improper use of material non-public information is known as insider trading. Insider trading is unethical and a criminal offense and is strictly prohibited. All personnel should read and understand the Company’s Insider Trading Policy, which is available on the Company’s portal.

Q: *Your department prepares financial statements. You learn that lower-than-expected quarterly earnings are about to be announced. Is this material non-public information?*

A: *Yes. This is material non-public information because it has not yet been announced to the public and a reasonable investor would consider the information important for deciding whether to buy or sell the stock. Therefore, you must refrain from disclosing such information to anyone outside of our Company and transacting in our stock or other publicly-traded securities until such information is known by the general public.*

Questions and Answers

Ethics-related questions arise almost every day in our personal and business lives. There is no doubt that, in the long run, honesty is always the best policy. Unfortunately, it is not always easy for us to determine the most ethical course of action, particularly if the situation encountered is complex or is subject to different interpretations.

Our Code was developed to help you make good decisions when ethical issues arise thereby protecting the name and integrity of the Company. Many questions are dispersed throughout this Code. However, a good rule of thumb is, take this quick business conduct test ... ask yourself the following questions:

- *Will my actions be consistent with the guidelines provided by our Code?*
- *Could I comfortably reveal all of my actions to my supervisor, fellow personnel, the general public, and my family?*
- *How will your decision affect others, including our customers, shareholders, personnel and the community?*
- *How will your decision look to others? If your action is legal but can result in the appearance of wrongdoing, consider taking alternative steps.*

And remember, when in doubt, ask.

Below are some other questions typically asked:

Q: If I only suspect a violation of the Code of Business Conduct, should I report it?

A: Yes. Report all known and suspected violations of the law or of the Code to your supervisor immediately. If confidentiality is a factor, you may report the issue directly to the Chief Ethics Officer or use the Employee Concerns Line.

Q: If I am not sure whether an action I am considering is a violation of the Code of Business Conduct, who should I contact for clarification?

A: Address questions regarding proper business conduct to your supervisor or, if appropriate, the Chief Ethics Officer.

Q: Why do I need a Code of Business Conduct since honesty is common sense?

A: We all must maintain the highest standards of honesty and integrity. Even honest individuals are sometimes not sure of what is appropriate business conduct since not everyone shares the same perspective and values. The Code provides guidelines for appropriate business conduct and a formal method of establishing accountability for noncompliance.

Q: What are some warning signs that actual or contemplated business activities may be contrary to the Code of Business Conduct?

A: If you hear any of the following types of statements, there could be a problem:

- *"Shred those documents immediately."*
- *"No one will ever be the wiser."*
- *"This sounds too good to be true."*
- *"I know it's not totally above board, but it's the only way to get the results we need."*
- *"Everybody does it."*
- *"It never happened. Right?"*
- *"OK, but just this once."*
- *"I don't care how you do it, just make it happen within the deadline."*
- *"A little white lie won't hurt anything."*

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