



THE POWER OF **COLLABORATION**

FIRSTENERGY'S SUPPLIER CODE OF CONDUCT POLICY



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A Message from FirstEnergy

FirstEnergy delivers vitally important electricity on which our communities rely. Delivering safe, reliable, and affordable electricity is a responsibility – a public trust – placed on us.

Our Suppliers play a key role in our mission to deliver this essential service to our customers. We look to collaborate with Suppliers who share our commitment to quality and cost, and operate with an unwavering commitment to integrity, safety, and doing the right thing.

FirstEnergy's Supplier Code applies to businesses that provide products, equipment, or services to FirstEnergy and its affiliates.

This Supplier Code aims to provide you with the framework you need to be successful when dealing with FirstEnergy or your own subcontractors or Suppliers. It establishes the foundation for our ongoing relationship and how we should work together.

If you have questions, feedback about our Supplier Code, or need additional information or assistance, please contact your FirstEnergy Purchasing Representative. Thank you for all you do to make FirstEnergy successful.



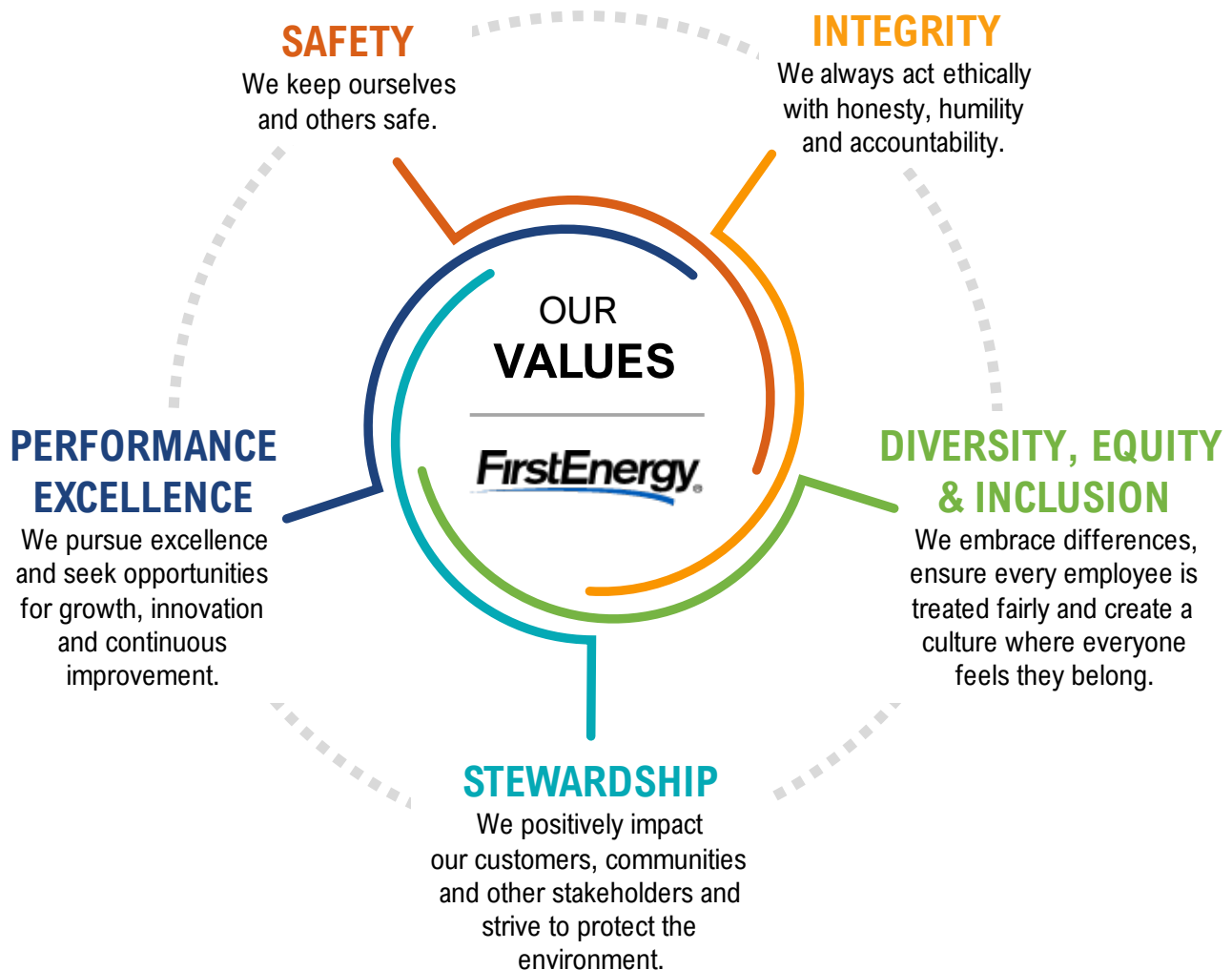
We are excited about our future – thank you for being a part of it.

A handwritten signature in black ink that reads "Rich Sweeney". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Rich Sweeney
Vice President, Supply Chain

Our Values

FirstEnergy's values define what we stand for as a company. They define how we do business and how we aim to have a positive impact in the world. Suppliers include our contractors, consultants, vendors, and their employees, agents, or subcontractors who provide goods or services to FirstEnergy and its affiliate operating companies (Suppliers). Our Supplier Code of Conduct (Supplier Code) makes our expectation clear—that our Suppliers uphold these same values when working on our behalf. For example, we believe a shared commitment to integrity and ethical business practices is the foundation for robust and trust-based business relationships that create shared value.





The Power of Collaboration – What It Is and Why It Matters

FirstEnergy's mission is to be a forward-thinking electric utility, centered on integrity. We are powered by a diverse team of employees and Suppliers. We are committed to making customers' lives brighter, the environment better, and our communities stronger. We can achieve this only with your support. Our values require that we act ethically and comply with all applicable laws and regulations.

This section describes what the Supplier Code is and how it fits into FirstEnergy's mission.

The Power of Collaboration: The Supplier Code

At the highest level, the Supplier Code explains what we expect from our Suppliers. While the Supplier Code is not intended to cover all situations that you may encounter, it should help you ensure your conduct is consistent with our expectations when serving or acting on behalf of FirstEnergy. It will also help you know when and how to raise questions or concerns.

This Supplier Code establishes the minimum standards required for being a Supplier with FirstEnergy. The Supplier Code applies to all Suppliers. Suppliers should educate their employees and subcontractors on this code. Any worker they assign to perform work for FirstEnergy must comply with it. The Supplier Code does not replace the specific requirements in contracts with FirstEnergy, and Suppliers must always comply with contractual requirements. We expect Suppliers to self-monitor and demonstrate compliance with this code. FirstEnergy reserves the right to audit to confirm the Supplier's compliance.

Obeying the Law

Suppliers must comply with all laws and regulations governing their relationship with us. If the standards in this Supplier Code are greater than applicable law, the Supplier shall follow the higher standard.

Speaking Up

You must speak up if you ever see or suspect a violation of the law or the Supplier Code. Promptly asking questions or raising concerns ensures we limit or avoid potential adverse consequences. Coming forward quickly allows FirstEnergy to take appropriate actions.

Our Suppliers have multiple resources to speak up, including:

- Their FirstEnergy representative
- The FirstEnergy Employee Concerns Line, toll-free, at 1-800-683-3625 (available 24 hours a day and with the option to remain anonymous)
- The FirstEnergy online portal, [EthicsPoint](#)
- FirstEnergy's Office of Ethics & Compliance (OEC) at ethicsoffice@firstenergycorp.com

It does not matter how you report. What matters is that you speak up.



No Retaliation

We prohibit retaliation against individuals who, in good faith, report a confirmed or suspected violation of the Supplier Code. We prohibit any retaliation against any individual who participates in an investigation.

We expect our Suppliers to:

- Take steps to prevent retaliation
- Address confirmed allegations, as necessary

If you believe you have been retaliated against by someone at FirstEnergy, please notify us by using one of the reporting options noted above.





The Power of Collaboration to Build Trust

Our Goal of Trusted Collaboration

Trust in relationships with Suppliers is vital to FirstEnergy's continued success. We value Suppliers committed to providing goods and services with the highest standards of quality, safety, openness, and integrity.

Supplier Selection

Our Suppliers are essential to our success, and we are prudent in Supplier selection.

We are committed to conducting business with Suppliers fairly and impartially. Supplier selection is based on fair and objective criteria. Suppliers must cooperate with all due diligence requests and processes.

We believe that building a broad pool of Suppliers is essential to FirstEnergy's economic health. We strive to conduct our business with competitive Suppliers and to remove barriers that may unfairly advantage or disadvantage Suppliers or groups of Suppliers. We expect our Suppliers to do the same when using subcontractors and performing work or procuring products on FirstEnergy's behalf.

Keeping Everyone Safe

Nothing matters more to us than keeping people safe when they work for or on behalf of FirstEnergy.

We expect our Suppliers to support our commitment to safety by providing a healthy and safe workplace. We expect Suppliers to apply safe work practices to their activities. This helps maintain the confidence and trust of the communities in which we operate.



We expect our Suppliers to:

- Follow all regulatory and contract-specific safety requirements and specifications, including site-specific rules when performing their work
- Follow all safety guidelines, protocols, and best practices to protect workers and customers
- Stay alert for any environmental, health, or safety issues that could pose risks beyond the immediate work area or facility
- Prohibit drugs, alcohol, weapons, harassment, and violence in the workplace

Treating Everyone with Respect

We believe everyone deserves to be treated with courtesy and respect, and to feel included, valued, and empowered to give their best effort. We expect you to support us in fostering a workplace environment based on respect and integrity.

We expect our Suppliers to comply with all applicable labor and employment laws, including by:

- Promoting and maintaining a workplace free from discrimination, harassment, and retaliation
- Treating customers, employees, agents, subcontractors, and FirstEnergy site visitors with respect and dignity
- Respecting employees' rights to organize and bargain collectively
- Not tolerating violence, harassment, threats, intimidation, bullying, assault, or aggressive conduct, either spoken or written
- Compensating workers fairly and in accordance with all applicable legal requirements
- Never using, or supporting the use, of forced labor, bonded labor, indentured labor, involuntary prison labor, child labor, slavery, or the trafficking of persons

Protecting Personal Information

We protect personal information by not sharing it with anyone who does not have a business need and legal right to receive it.

During work for FirstEnergy or on FirstEnergy matters, you may have access to FirstEnergy-supplied/derived personally identifiable information.



We expect our Suppliers to:

- Follow all FirstEnergy written guidance covering personal information and privacy
- Collect, use, and process FirstEnergy-supplied/derived personal information only for legitimate business purposes
- Share FirstEnergy-supplied/derived personal information only when necessary for business purposes and when legally permissible
- Follow all applicable personal information and data privacy laws
- Delete or destroy FirstEnergy-supplied/derived personal information once the business need for the data is complete
- Cooperate fully with FirstEnergy in the event of a data security breach or other incident

Preventing Bribery and Corruption

We engage Suppliers we trust to operate ethically and stand with us in fighting bribery and corruption.

We are committed to operating with and selecting Suppliers honestly and fairly. This builds trust and tells the world we will only do business correctly.

We expect our Suppliers to:

- Never offer or accept bribes, kickbacks, or anything of value that could improperly influence – or appear to influence – a business decision
- Follow anti-corruption laws
- Take particular care not to promise or provide anything of value to public officials or anyone else to gain a business advantage
- Abide by all U.S. government trade restrictions with certain countries, companies, and people to prevent nuclear proliferation, battle terrorism and the global narcotics trade, and comply with political sanctions

A **BRIBE** is providing anything of value with intent to:

- Inappropriately influence an action or inaction
- Secure an improper advantage or business
- Induce the improper performance of a responsibility by the recipient

A **KICKBACK** involves giving or receiving a personal payment (whether in cash or otherwise) as a reward for awarding a contract or other favorable outcome or business transaction. For example, if a third party pays a FirstEnergy employee a percentage of the third party's sales to the company in return for the employee's assistance in steering business to the third party, the payment is a kickback.

Bribes and kickbacks of any kind are completely unacceptable.



The Power of Collaboration to Excel in the Marketplace

Competing Fairly and Legally

We want to collaborate with Suppliers who operate competitively while promoting free and open markets.

We do not restrain trade, competition, prices, terms, or markets. We market, advertise, and collect data fairly and honestly.

We expect our Suppliers to:

- Comply with applicable antitrust and competition laws
- Never propose or enter into any agreement or understanding with a competitor to:
 - Fix or in any way manipulate prices
 - Rig bids
 - Divide or allocate markets, industries, territories, or customers
 - Collude with other FirstEnergy Suppliers
 - Deal or not deal with a particular customer or Supplier
 - Deal with a customer or Supplier only on certain terms, limit output, or capacity utilization
- Never propose or enter into agreements or understandings restricting the price at which a party may resell a product or service

Interacting Appropriately with Affiliates

We follow all rules regarding how our various businesses interact with each other.

Sometimes, one FirstEnergy business performs work to support another FirstEnergy business. It is important that you recognize such transactions, as the Federal Energy Regulatory Commission (FERC) and the state utility regulatory agencies have established special rules that we must follow.

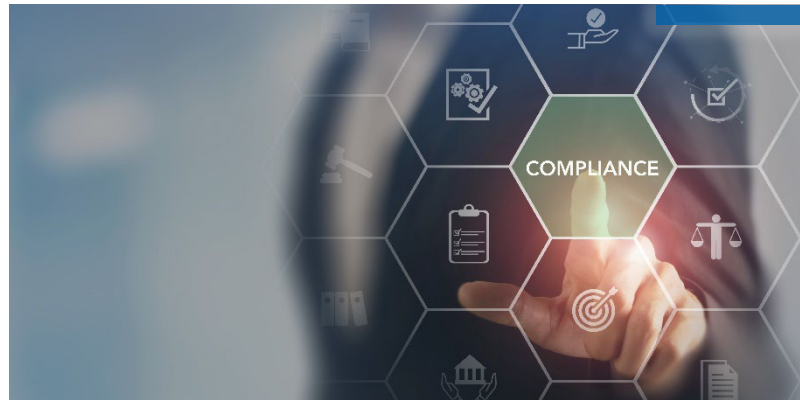
We expect our Suppliers to:

- Be familiar and comply with the standards and processes for managing all transactions between FirstEnergy and its affiliates
- Treat all FirstEnergy businesses as independent entities, except as explicitly set forth in an agreement among multiple FirstEnergy entities and the Supplier
- Safeguard all information related to each entity and never share it unless authorized for appropriate business reasons
- Properly allocate and record all time to the appropriate FirstEnergy entity
- Appropriately charge the costs for sales of non-power goods and services between FirstEnergy and other FirstEnergy companies

Maintaining Regulatory Compliance

We follow all rules, regulations, and requirements of the federal, state, and local agencies that regulate FirstEnergy.

We expect our Suppliers to understand and comply with all federal, state, and local regulations and related requirements.



Following International Trade Laws

We are committed to following all applicable laws and regulations that govern international trade.

You must respect applicable customs, trade, and sanctions laws and regulations.

We expect our Suppliers to:

- Comply with all applicable laws and regulations governing:
 - The export, re-export, and transfer of goods, technical data, software, and services
 - Import of goods and obligations with respect to sourcing materials
 - Economic sanctions and embargoes
 - U.S. anti-boycott requirements
- Not manufacture or subcontract for the manufacture of any products for which conflict minerals are necessary to the functionality or production of that product



The Power of Collaboration to Deliver Value

Avoiding Conflicts of Interest

We make smart choices in the best interests of FirstEnergy, unaffected by personal interests or relationships.

We expect to collaborate with Suppliers who do not allow personal interests or relationships to compromise their decision-making. Using good business judgment builds mutual trust and helps us maintain performance excellence. It also enables us to collaborate and innovate without distraction. Even the appearance of a conflict of interest can be a problem. It can lead others to think we are not acting properly. We can avoid or address conflicts of interest if they are promptly disclosed and effectively managed.

We expect our Suppliers to:

- Never make business decisions on behalf of FirstEnergy based on personal relationships, bias, or the potential for personal gain
- Recognize and disclose actual or potential conflicts to their company's management and FirstEnergy representative, and/or FirstEnergy's OEC

A conflict may arise if a Supplier:

- Employs a current FirstEnergy employee or someone with a close personal relationship to a FirstEnergy employee to perform work for FirstEnergy
- Is partially or fully owned or controlled by a current FirstEnergy employee or someone with whom they have a close personal relationship
- Has access to FirstEnergy's proprietary information while providing goods and services to FirstEnergy's competitors and uses this information to benefit themselves or a competitor
- Provides services to develop a request for proposal (RFP) to be issued by FirstEnergy and seeks to bid on the work covered by that RFP
- Is engaged or overseen by a FirstEnergy employee with whom they have a close personal relationship

Handling Gifts and Business Courtesies Responsibly

We build business relationships based on trust and mutual value and never through the giving or receipt of inappropriate gifts or hospitality.

Suppliers must never offer, provide, or accept gifts or business courtesies to or from FirstEnergy employees to influence a business decision or that might reasonably be perceived that way by others.

We expect our Suppliers to:

- Never offer or provide personal incentives or rewards to FirstEnergy employees to influence a business decision, such as a procurement award
- Ensure all gifts are acceptable for valid business purposes and occur infrequently
- Never provide or accept any monetary gifts, such as cash, gift cards, or personal discounts
- Never provide a Gift or Business Courtesy to FirstEnergy Supply Chain employees – see above
- Never offer gifts or business courtesies when payment, contracting, or other related decisions are pending
- Never provide a gift on behalf of FirstEnergy to any government official or any employee or representative of a governmental entity without obtaining prior written approval from FirstEnergy's OEC

You must request any exceptions to managing gifts in writing. You must receive approval in advance by your highest-level FirstEnergy business contact in consultation with FirstEnergy's OEC.



WHAT IS A GIFT? A gift is an item of more than the nominal value (i.e., more than \$15) for which the recipient is not required to pay the retail or customary cost. Items of nominal value such as pens, notepads, mugs, t-shirts, or baseball hats are not considered gifts. *Note: Pre-approval is required for any gift including items of nominal value when the intended recipient is a government official.*

WHAT IS A BUSINESS COURTESY? A business courtesy is any business-related item of value given to another individual at a discounted rate or for free. Examples include social or entertainment events, such as meals, sporting events, theatrical events, receptions, or associated travel. These courtesies are not considered gifts when the individual providing the courtesy is present for the event or meal.

WHAT IS THE DIFFERENCE BETWEEN A GIFT AND A BUSINESS COURTESY? The notable difference between a gift and a business courtesy is whether the person offering and the person accepting the item of value attend the meal, entertainment, travel, or lodging together. For example, if a business partner offers an employee a ticket to an event for the employee to enjoy themselves, it is considered a gift. If the business partner provides tickets to an event for the employee to attend with the business partner for a business purpose, it is considered a business courtesy.

CAN A FIRSTENERGY EMPLOYEE IN THE SUPPLY CHAIN FUNCTION ACCEPT GIFTS OR BUSINESS COURTESIES? A FirstEnergy employee in the supply chain function, may not accept any gifts or business courtesies from current or prospective suppliers. Items of nominal value are acceptable.

Creating, Maintaining, and Disclosing Accurate Records and Accounts

We keep accurate records and accounts, which help us operate effectively and provide timely and truthful information to those who need to rely on it.

Accurate, reliable information and records are critical to meeting FirstEnergy's obligations.

We expect our Suppliers to:

- Follow all applicable laws and contractual requirements in creating, maintaining, and disposing of records created that accurately reflect your business dealings with FirstEnergy
- Prohibit all attempts to create false or misleading records
- Preserve documents related to an investigation, claim, or lawsuit

Protecting Our Intellectual Property and Confidential Business Information

We safeguard our intellectual property and confidential information from misuse, misappropriation, destruction, and loss.

Our expectation is that suppliers uphold the highest standards of cybersecurity and data privacy, subject to FirstEnergy's documented standards. We entrust them with sensitive personal information, and they must demonstrate a proactive and comprehensive approach to safeguarding this data. This includes implementing robust security controls, adhering to industry best practices and regulatory requirements, and fostering a culture of security awareness. We expect transparency and accountability in their security practices, along with a commitment to continuous improvement and collaboration in addressing evolving cyber threats



While working with FirstEnergy, you may obtain or have access to our confidential or proprietary information. You must take care to protect it against unauthorized disclosure and misuse.

We expect our Suppliers to:

- Use confidential, proprietary, and personal information only for the purposes for which it was collected
- Never disclose confidential information without prior proper written authorization
- Dispose safely of all FirstEnergy intellectual property and confidential information
- Safeguard FirstEnergy's intellectual property
- Notify your FirstEnergy representative immediately if:
 - Any confidential information has been released without authorization
 - You suspect that the confidential information was released because of a cybersecurity incident
 - You have doubts about whether FirstEnergy related information or knowledge is confidential
 - You believe that confidential information has been mismanaged

Confidential and proprietary information includes knowledge about:

- Operations
- Plans
- Employees
- Strategies
- Customers
- Transactions
- Facilities
- Processes
- Finances
- Other Suppliers

Intellectual property includes assets such as:

- Patents
- Copyrights
- Service marks
- Trademarks
- Logos
- Trade secrets

Safeguarding Company Assets

We protect FirstEnergy's reputation and other assets. They are the building blocks for our future.

Making the best use of what we have today sets us up for success tomorrow. Our assets sustain our operations and allow us to invest in innovation and continuous improvement.

We expect our Suppliers to:

- Be good stewards of FirstEnergy's assets
 - Using them in the best interest of FirstEnergy
 - Not abusing your privilege to use them, such as by sharing the information or disposing of it improperly when no longer relevant
- Use FirstEnergy assets only for legitimate, approved business purposes
- Immediately report any concerns about the use, abuse, or endangerment of FirstEnergy's assets

Assets include:

- Facilities
- Technology
- Office supplies
- Equipment
- Field supplies
- Information related to our customers, processes, operations, and finances

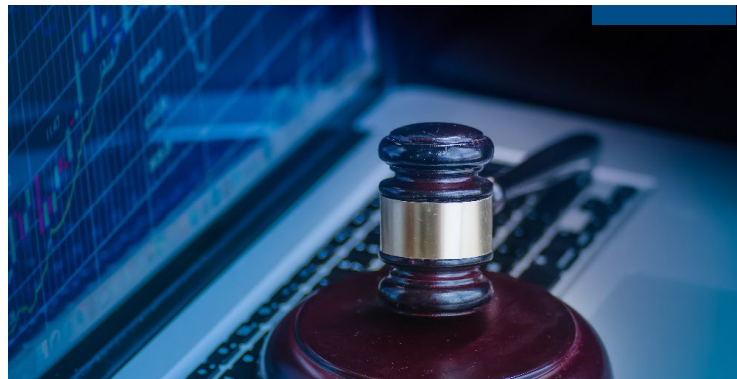
Preventing Insider Trading

We never use or share material, non-public information about FirstEnergy or another company for the purpose of trading securities.

You may have access to material, non-public information ("Inside Information") about FirstEnergy or other companies that could be potentially useful to investors.

Suppliers that have access to Inside information are prohibited from doing any of the following:

- Buying or selling the securities (stocks, bonds, or derivatives) of FirstEnergy directly or through any other persons or entities
- Recommending or suggesting that anyone buy or sell the securities of FirstEnergy or any companies with whom it is engaged in business, while in the possession of Inside Information about FirstEnergy or those other companies



- Sharing Inside Information with another person who may use that Inside Information to buy or sell FirstEnergy's securities
- Discussing confidential FirstEnergy business with third parties

Insider information consists of details that an investor would consider important in making an investment decision. Using this information for your own benefit or sharing it for the benefit of others is called insider trading. It is illegal because it provides an unfair advantage and distorts financial markets. The insider trading laws are enforced aggressively, which can mean heavy fines and imprisonment for those convicted.



The Power of Collaboration to Strengthen Our Communities

Making the Environment Better

Preserving and protecting the environment is key to our mission and business strategy.

We conduct sustainable operations designed to comply with all applicable federal, state, and local laws. We continually work to reduce our impact on the environment. We work to meet best practice standards in:

- Asset construction and management
- Emissions control
- Permitted discharges
- Waste management
- The health, safety, and general welfare of our employees and communities

FirstEnergy expects you to share this same commitment.

We expect our Suppliers to:

- Abide by all applicable environmental laws, regulations, and rules, as well as contract-specific policies and specifications
- Conduct operations in a manner that safeguards the environment: minimizes waste, emissions, energy consumption, and the use of materials of concern
- Promptly notify FirstEnergy in situations where an environmental incident associated with FirstEnergy business operations has occurred
- Integrate principles of sustainable development into all areas of your business

Engaging Appropriately in the Political Process

We engage thoughtfully in the political process. We responsibly advocate for our interests while bringing positive change to our communities.

FirstEnergy has a legitimate stake in political priorities and outcomes. We work closely with all levels of government.

Suppliers that engage in the political process on FirstEnergy's behalf must do so responsibly and comply with all related laws and regulations. Suppliers may not engage in political activity on behalf of FirstEnergy without prior approval.

Speaking Positively with One Voice

We speak with one voice when communicating publicly to all audiences, including to:

- Investors
- Financial analysts
- The media

Only authorized FirstEnergy spokespersons are allowed to speak on the Company's behalf.

Suppliers may not speak on FirstEnergy's behalf. You must contact your FirstEnergy representatives regarding any inquiries.

Suppliers are not to mention FirstEnergy, directly or indirectly, without FirstEnergy's prior written consent, in:

- Advertising
- Promotional materials
- Any form of social media



Waivers and Exceptions

FirstEnergy may waive or alter any provision of the Supplier Code at its sole discretion. Waivers or exceptions may be submitted by the FirstEnergy business contact to FirstEnergy's VP, Supply Chain and FirstEnergy's Chief Ethics & Compliance Officer, or their designee, for review and resolution. No waiver or exception granted by FirstEnergy shall be deemed or constitute a waiver or exception to any other provision of the Supplier Code, nor will it be deemed or constitute a continuing waiver or exception.

