



Supplier Code of Conduct

Effective 04-04-2019

FirstEnergy Supplier Code of Conduct Introduction

FirstEnergy is a forward-looking electric utility powered by a diverse team of personnel, consisting of both employees and contractors, committed to making our customers' lives brighter 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.

This Supplier Code of Conduct supports FirstEnergy's goals in its Code of Business Conduct.

Commitment to Maintaining the Highest Supplier Standards

The Supplier Code of Conduct serves a guide to our suppliers of the high standards they must meet in their day-to-day activities. It also helps suppliers to understand the standards expected while collaborating with FirstEnergy. The Code is not intended to cover all situations that suppliers may encounter; its guidelines help reinforce the expectation that suppliers use good judgment and integrity in their business dealings with FirstEnergy.

Compliance with Laws, Regulations and Rules

FirstEnergy expects all Suppliers to comply with all applicable legal requirements, laws, regulations, and disclosure obligations, applicable to the operation of your business and the work provided in your relationship with us, including international laws applicable to our business and our suppliers and their business partners.

Health and Safety

Safety is the top priority for FirstEnergy and we expect our suppliers to support this commitment by providing a healthy and safe workplace, and applying safe work practices to all of their activities. FirstEnergy also expects suppliers to comply with all regulatory and contract-specific safety requirements and specifications, including site-specific rules when performing their work. FirstEnergy also expects suppliers to also ensure safe and healthy work environments for their employees.

Environmental Protection and Sustainability

FirstEnergy is committed to protecting the environment and enhancing the communities in our service territory through our daily work. FirstEnergy expects suppliers and their business partners to share this commitment to protect the environment. Suppliers must abide by all applicable environmental laws, regulations, and rules as well as contract-specific policies and specifications in a way that protects the environment. Suppliers must not only comply with all applicable environmental laws, but also conduct operations in a manner that safeguards the environment, minimizes waste, emissions, energy consumptions and the use of materials of concern.

Conflicts of Interest

FirstEnergy expects suppliers to adhere to our Conflicts of Interest Policy. This means that suppliers must act in the best interests of FirstEnergy, not benefiting unfairly at FirstEnergy's expense. Avoiding conflicts of interest is crucial to maintaining integrity in your relationship with FirstEnergy. Any potential conflicts of interest should be reported promptly to FirstEnergy for further review.

International Trade Compliance

Supplier must conduct business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and transfer of goods, technical data, software and services; (b) import of goods and obligations with respect to sourcing materials; (c) economic sanctions and embargoes; (d) U.S. antiboycott requirements. Further, Supplier's business partners must share in the responsibility of complying with all laws and regulations applicable to suppliers' operations, including without limitation the Foreign Corrupt Practices Act and Section 1502 of the Dodd-Frank Act regarding conflict minerals.

Fair Employment Practice

FirstEnergy is committed to providing a respectful and nondiscriminatory workplace. Suppliers are expected to support this commitment by complying with all applicable labor and human rights laws which include those related to equal opportunity, child labor, forced labor, working hours, wages and benefits, freedom of association, immigration and harassment-free workplace.

Supplier must ensure that child labor is not used in the performance of the work with FirstEnergy or any company. "Child" is defined as any person under the minimum legal age of employment where the work is performed.

Suppliers must comply with laws and regulations prohibiting human trafficking. Supplier must not engage in the use, or supported use, of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking of persons.

Suppliers must comply with all applicable wage and benefit laws and regulations, including laws of other countries, if applicable.

Suppliers must comply with all applicable laws relating to employees' rights to engage in concerted activity or collective bargaining, including laws of other countries, if applicable.

Diversity

FirstEnergy is committed to ethical and fair dealings in sourcing events. FirstEnergy believes that diverse suppliers are essential to economic health and strives to conduct its business with competitive, diverse suppliers. FirstEnergy is committed to providing equal opportunities for all suppliers seeking to sell their products and services to us. All small businesses, including minority/small disadvantaged businesses, women-owned, HUBZone, veteran and service-disabled veteran owned businesses shall have the opportunity to offer their products or services for consideration in our selection of suppliers. FirstEnergy adheres to a policy of conducting all supplier transactions in a fair, honest, and ethical fashion without bias or prejudice. Our goal is to work with all small businesses in an impartial, fair manner, providing such organizations equal consideration of their products or services. Purchases are based on "best evaluated" which includes price, quality, quantity and delivery specifications. It is our intent that no supplier receives an unfair competitive advantage over another. In turn, FirstEnergy expects its suppliers to seek out and utilize diverse suppliers when performing work or procure products on our behalf.

Business Records

Complete, accurate and reliable information is crucial for FirstEnergy to meet financial, management and legal obligations. Suppliers must comply with generally accepted accounting principles. Suppliers must follow all

applicable laws and contractual obligations when creating, maintain and disposing of records related to the work performed for FirstEnergy.

FirstEnergy Resources

FirstEnergy Resources shall only be used by suppliers for legitimate business purposes, in furtherance of the work being performed. FirstEnergy resources include company facilities, equipment, technology assets, field supplies, office supplies, and information related to our customers, processes, operations, and finances. Suppliers are required to secure and protect FirstEnergy assets and information from unauthorized use or disclosure.

Compliance to Code

Suppliers will allow representatives of FirstEnergy to evaluate your compliance as set out in this Supplier Code of Conduct, while performing work for FirstEnergy. This includes on-site inspections of facilities and review of applicable records, books or other documentation.

Suppliers must ensure that FirstEnergy also has the right to evaluate supplier's business partners' compliance as set out in this Supplier Code of Conduct. This includes on-site inspections of facilities and review of applicable records, books or other documentation.

In the event of any offense, supplier and any of its business partners will fully cooperate with any investigation related to their performance. If such investigation identifies any misconduct, supplier and its business partners must correct such nonconformity(ies). FirstEnergy will not be responsible for ensuring supplier's compliance to this Supplier Code of Conduct. Supplier must take full responsibility for their compliance with this Code by its directors, officers, employees, representatives and business partners.

Where to Go for Help and To Report Violations

Known or suspected violations of laws, rules, regulations or this Supplier Code of Conduct are serious matters and must be dealt with accordingly. If you become aware of or suspect a violation, you must report it immediately. Failure to report such violations, and failure to follow the provisions of this Supplier Code of Conduct, may have serious legal consequences.

When confidentiality is a concern, suppliers 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 Concerns Line (1-800-683-3625) is available to employees and non-employees outside of the Company to ensure that we have an effective and anonymous means to report compliance issues in the be used to communicate your concerns by telephone. When using this service, you will not be asked to identify yourself. You will be able to use the 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 Supplier Code of Conduct.