

SUPPLIER CODE OF CONDUCT (“Code”)

Introduction

EKPC is committed to making lives better with affordable, reliable power, and we value our suppliers who help us fulfill this important responsibility. We are committed to fair and equitable treatment of our suppliers and strive to develop strong, long-term, mutual relationships.

These Standards are intended to guide you as you fulfill your responsibilities as an EKPC Supplier. These Standards do not change or replace any contractual terms and conditions. Rather, this Code of Conduct establishes the basic principles and expectations for business conduct. This Code was developed based on EKPC’s Values that underlie everything we do: Safety, Service, Honesty & Integrity, Respect, Teamwork and Environmental Stewardship.

Working with Us

EKPC employees are expected to uphold the highest standards of moral and ethical behavior in performing their duties on behalf of EKPC and to avoid conflicts of interest or the appearance of such conflicts. EKPC strives to ensure that the business affairs of EKPC are conducted in an ethical and businesslike manner.

When you choose to become an EKPC Supplier, we expect the same high level of standard from you. This Code is applicable to you and to all employees employed by you or engaged by you to provide products and/or services to EKPC. This Code highlights important areas and outlines EKPC expectations, however, by no means is it an exhaustive list. Violation of this Code may result in termination of our business relationship. This Code includes requirements in the following areas:

- Compliance
- Ethics
- Equal Employment Opportunity
- Harassment
- Business Courtesies
- Environmental
- Confidentiality
- Safety
- Drugs and Alcohol
- Competing for Business
- Lobbying
- Conflicts of Interest



Compliance

EKPC expects you to comply with all applicable terms and conditions, policies and procedures, guidelines, standards, and laws and regulations.

Ethics

EKPC expects you to conduct business activities through your complete supply chain with the highest moral and ethical standards.

Equal Employment Opportunity

EKPC affirms the principle of equal employment and affirmative action without regard to any protected characteristic under law and expects you to do the same.

Harassment

EKPC policy prohibits harassment in any form, and EKPC expects you to provide a work environment free from harassment in accordance with applicable laws and regulations.

Business Courtesies that May Be Extended

EKPC employees are prohibited from soliciting or accepting any item of material value, either tangible or intangible, from suppliers or their agents. Occasional and non-routine acceptance of a meal or other courtesy of immaterial value is acceptable. No courtesies should be extended during a bid process.

Likewise, any courtesy extended by EKPC shall not be construed as an attempt to secure an award of business or favor. Any questionable requests or behaviors shall be reported to EKPC's internal audit or legal department by calling 859-744-4812.

Environmental

EKPC expects you to comply with all applicable environmental laws, regulations, site rules, processes and procedures.

Confidentiality

EKPC expects you to safeguard and hold in confidence all information relating to the Work and/or the business of EKPC.

Safety

Safety is EKPC's top priority. EKPC expects you to follow all applicable laws, contractor safety handbook, site specific safety guidelines and procedures to protect your employees and your subcontractors' employees, EKPC facilities, property, employees, and third parties from damage or injury. A copy of EKPC's contractor safety handbook is located on our website at www.ekpc.coop

Drugs and Alcohol



EKPC prohibits any person from performing work while under the influence of drugs or alcohol.

Competing for Business

EKPC expects you to compete fairly and ethically for all business opportunities. You should ensure that all representations to EKPC are accurate and truthful.

Lobbying

Federal regulations prohibit EKPC from using federal appropriated funds to pay any person for influencing or attempting to influence certain federal officers or agents in connection with the making of a federal loan. You are required to comply with the requirements of Pub. L. 101-121, Section 319, 103 Stat. 701, 750-765 (31 U.S.C. 1352), entitled "Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions," and any rules and regulations issued pursuant thereto.

Conflicts of Interest

EKPC policy instructs employees to avoid conflicts of interest or any appearance of conflicts of interest in performing their duties and EKPC expects the same of you. You should avoid any circumstance that could cast doubt on your ability to act with total objectivity with regard to EKPC'S interests. You should report any conflict of interest or questionable behavior to EKPC Legal Counsel or Internal Auditor by dialing 859-744-4812.

Enforcement

EKPC expects you to comply with this Code to maintain your status as an EKPC Supplier. A violation of this Code may result in breach of the Agreement between the parties and shall be subject to all available remedies.