



Xcel Energy
Supplier Code of Conduct

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Introduction

At Xcel Energy, our core values — Safe, Connected, Committed and Trustworthy — are integral to how we do business, and we expect our Suppliers to respect and promote these values.

This Supplier Code of Conduct (“Code”) applies to all of the Suppliers of goods and services (“Suppliers”) who support Xcel Energy, its subsidiaries, joint ventures, divisions or affiliates. We define Suppliers as consultants, contractors, suppliers, vendors and their employees, agents or subcontractors who provide goods and services to Xcel Energy and its affiliate operating companies. Suppliers may not subcontract responsibilities without the prior written permission of Xcel Energy.

To the extent the company agrees to allow Suppliers to subcontract, Suppliers shall ensure that all subcontractors are bound by the terms of this Code. Suppliers are expected to educate their employees, agents and subcontractors so they understand and comply with this Code.

Suppliers are required to comply with the expectations in this Code, applicable policies, position statements, and all contractual obligations with Xcel Energy. Compliance with this Code is a requirement for becoming or remaining a Supplier with Xcel Energy. The expectations set forth here are intended to supplement, not replace requirements established by contract or purchase order. While Suppliers are expected to self-monitor and demonstrate their compliance with the Code, Xcel Energy may audit Suppliers to confirm compliance. Suppliers that behave in a manner that is inconsistent with the Code risk termination of their business relationship with Xcel Energy.

If you have a question regarding this Code, or you experience, observe or are informed of any conduct that is not in compliance with this Code, you have a responsibility to report it immediately — even if you are not sure whether a Code violation has occurred.

We provide numerous reporting options so you can report concerns in whatever way you choose.

- Speak to your Xcel Energy procurement representative
- Contact the Corporate Compliance and Business Conduct Office at **612-215-5354** or **ComplianceBusinessConduct@xcelenergy.com**
- Contact the third-party Compliance Hotline at **XcelEnergyComplianceHotline.com** or **800-555-8516** (available 24 hours a day and with the option to remain anonymous)

Xcel Energy will maintain confidentiality to the extent possible and we strictly prohibit any retaliation against individuals who, in good faith, report a violation or suspected violation of the law, Code or other policy, or participate in an investigation. We also expect our Suppliers to take appropriate steps to prevent retaliation and address confirmed allegations as necessary. If you believe you have been retaliated against by someone at Xcel Energy, please notify us through one of the reporting options noted above.

Thank you for the work you do and your commitment to our values.





SAFE

Drive and Sustain a Safety Culture

Our Safety Always approach focuses on creating an open, transparent and trusting culture where employees share experiences, learn from events and collaborate to help protect themselves, their coworkers, our customers and the general public. We expect our Suppliers to support our Safety Always approach by adhering to all Xcel Energy safety policies and procedures and actively participating in safety learning events, whenever requested.

Suppliers are expected to always treat safety as one of their primary responsibilities; work in ways that prevent injury to themselves, others and customer/company property; exercise good judgment; and apply safe and healthy work practices to all activities. Additionally, Suppliers are to:

- Promote and follow all safety and health laws, regulations and procedures
- Speak up and intervene if something appears unsafe
- Require the use of appropriate and OSHA compliant personal protective equipment to protect from hazards where applicable
- Promptly notify Xcel Energy of any actual or potential safety, health or environmental hazards or fatalities, injuries, near miss events, or property damage on Xcel Energy premises or project sites
- Promptly notify Xcel Energy of any contact by a representative of a regulatory agency relating to work performed on behalf of Xcel Energy (e.g., OSHA letter)
- Abstain from using alcoholic beverages, mood-altering drugs and drugs that adversely impact performance while performing work on behalf of Xcel Energy





Protect Human Rights

Xcel Energy is committed to upholding the human rights and ethical treatment of all people — and expects the same commitment from Suppliers.

Suppliers must comply with the letter and spirit of applicable U. S. and international labor and employment laws, and the general principles set forth in the International Labor Organization Conventions, including those associated with equal opportunity, immigration, child labor, forced and trafficked or compulsory labor. Additionally, workers must be fairly compensated for their work and wages should comply with local laws regarding minimum wage, wage payment, and work hours.

In addition, we recognize the right of all employees to select union representation, in accordance with applicable laws. Through collective bargaining, we facilitate positive union relations and promote collaboration on business challenges that impact our operations and workforce.

We expect Suppliers, as legally permitted, to respect rights of workers to associate freely with others, form, and join or not join labor unions or organizations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment and comply with all applicable local and national laws pertaining to freedom of association and collective bargaining.



Read and follow:
Human Rights Position Statement



CONNECTED

Supplier Selection and Diversity

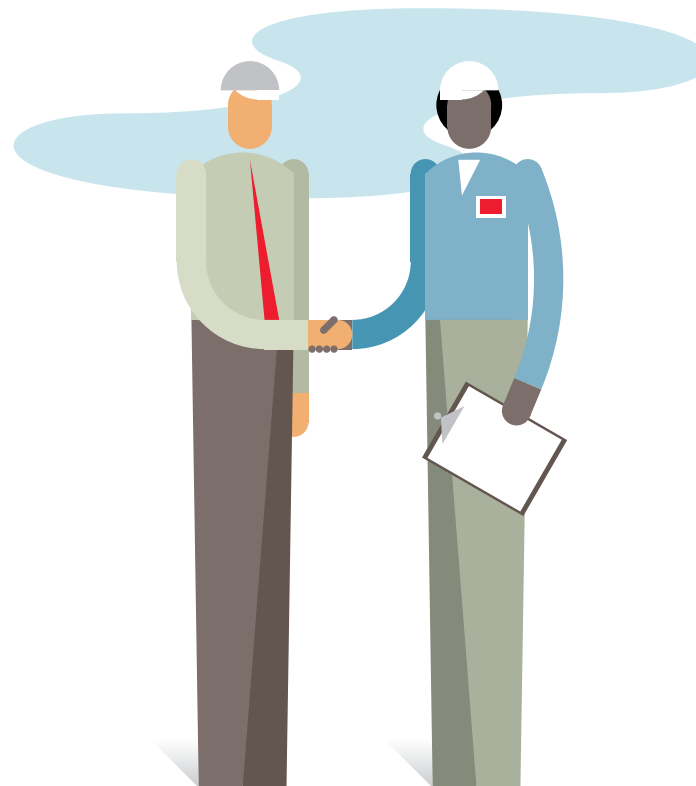
Our Suppliers are integral to the success of our company and we are prudent in our Supplier selection. We are committed to fair and ethical dealings in bid evaluation, negotiation, award decisions and the administration of purchasing and sourcing activities. Our decision to select a Supplier is based on fair and objective criteria, including safety record, technical, commercial or other valid business reasons. Suppliers are therefore expected to cooperate with all due diligence requests and processes. However, participation in the process is not a guarantee of selection nor is selection a guarantee of exclusivity.

We recognize the value of diverse suppliers such as minority-owned, women-owned, veteran-owned, LGBTQ-owned, disability-owned, and small business ownership. Xcel Energy expects Suppliers to have equivalent policies to promote diversity in their supply chains. Suppliers must agree to make a reasonable effort to seek, use and develop diverse Suppliers and Subcontractors while performing work on the company's behalf and provide Xcel Energy verification of these efforts upon request.

Respect Each Other

We also expect Suppliers to promote and maintain a workplace free from discrimination by treating customers, employees, agents, subcontractors and Xcel Energy site visitors with respect and dignity. In addition, Suppliers are expected to demonstrate zero tolerance for violence, harassment, threats, intimidation, bullying, assault or aggressive conduct, either spoken or written.

If you experience, observe or are informed of any possible discrimination, harassment or other unacceptable behavior against yourself or another person, you are expected to promptly report it using one of the reporting options [outlined in the Code of Conduct](#).



Protect the Environment

We reflect our commitment to the environment through our actions. We comply with all applicable environmental laws, permits, conditions and other requirements pertaining to the operation of our facilities in relation to air, water, land and other natural resources. At Xcel Energy, our vision is to provide 100% carbon-free electricity to our customers and to be an overall net-zero energy company by 2050 while keeping service reliable and customer bills low. In addition, we aim to achieve net-zero greenhouse gas emissions from our natural gas business by 2050 and support programs that will enable one of every five vehicles to be electric by 2030.

We actively seek Suppliers that share our commitment, and drive efforts to reduce negative environmental impact. Suppliers must abide by the letter and the spirit of all federal, state and local environmental laws including, but not limited to, pollution, waste disposal, air emissions and stormwater management. Additionally, Suppliers must comply with all contractual obligations with Xcel Energy, and all permits and registrations must be obtained when required.

In line with this vision, we encourage our Suppliers to develop similar sustainability commitments and plans in their own operations. Our expectation is that our Suppliers use natural resources such as energy, water, and raw materials in a responsible way. Additionally, we expect Suppliers to implement plans to reduce greenhouse gas emissions, create more circular supply chains, and reduce waste. We aim to champion environmental justice causes through engagement with our local communities and ask that our Suppliers do the same to create a more sustainable world for all.



[Learn more about our sustainability commitments here](#)

Responsibly Source Minerals

Xcel Energy is committed to complying with federal laws and regulations requiring disclosure of the use of conflict minerals.

Suppliers must not use conflict minerals whose obtainment is linked to human rights violations and must meet the conflict reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.





TRUSTWORTHY

Compliance Responsibility

Our businesses are heavily regulated by many federal, state and local governmental entities, including the Federal Energy Regulatory Commission (FERC), the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the Nuclear Regulatory Commission (NRC) and the Securities and Exchange Commission (SEC). In addition, state agencies, such as public utility commissions, pollution control agencies and departments of natural resources have regulatory oversight, and government-sponsored entities such as the North American Electric Reliability Council (NERC) have oversight responsibilities.

In addition to those specifically called out in this Code, our Suppliers are expected to comply with all applicable U. S. and foreign laws and regulations. Violations of these rules – whether intended or not – can damage our operations, financial sustainability and reputation. If local laws are less restrictive than this Code, Suppliers are expected to comply with the expectations in this Code. Suppliers should implement a compliance program commensurate with their size and risk exposure to prevent, detect and correct issues of noncompliance.

Keep Accurate Books and Records

Accurate record keeping and reporting provide transparency to our stakeholders and help us meet our legal and regulatory requirements. Maintaining financial integrity reflects positively on our credibility and demonstrates our value of trustworthy.

Suppliers must comply with generally accepted accounting principles (GAAP), including a system of internal controls to promptly, completely and accurately prepare required reports, vouchers, reimbursement requests and invoices. Suppliers must follow all applicable laws and contractual requirements in creating, maintaining and disposing of records created during the course of their performance that accurately reflect their business dealings with Xcel Energy. Suppliers are expected to create business records for Xcel Energy in an honest and accurate manner.

Avoid Conflicts of Interest

Suppliers are expected to act in the best interest of Xcel Energy and to avoid conflicts of interest. A conflict of interest exists when a Supplier's personal interests interfere with or may appear to interfere with its responsibilities to Xcel Energy.

Conflicts, or potential or perceived conflicts, can occur in many forms and situations. The following examples are not all-inclusive but provide some common situations where conflicts might occur and should either be avoided or disclosed.

An example of an actual or perceived conflict of interest could include when a Supplier:

- Employs a current Xcel Energy employee or someone with a close personal relationship to an Xcel Energy employee to perform work for Xcel Energy
- Is engaged or overseen by an Xcel Energy employee with whom they have a close personal relationship
- Is partially or fully owned or controlled by a current Xcel Energy employee or someone with whom they have a close personal relationship
- Has access to Xcel Energy's proprietary information while providing goods and services to Xcel Energy'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 Xcel Energy and seeks to bid on the work covered by that RFP

The above circumstances are not meant to be an exhaustive list. Additionally, Suppliers must inform us before entering a business transaction with Xcel Energy if you have a family member working at Xcel Energy or its affiliates or if you are an employee of Xcel Energy by filling out the Conflicts of Interest form at [XcelEnergyComplianceHotline.com](https://www.xcelenergy.com/en-us/about-us/compliance/conflicts-of-interest).

Gifts, Meals and Entertainment

We strive to build good working relationships with our Suppliers, customers and other business partners, and we realize that giving or accepting modest forms of gifts, meals and business entertainment can help build those relationships. However, we must always maintain integrity in our business relationships and remain impartial, objective and free of outside influence. We expect the same from our Suppliers.

Suppliers must never offer personal incentives, gifts, meals or business entertainment to Xcel Energy employees in an effort to influence a business decision.

Any gift provided to an Xcel Energy employee must be modest in value and designed to create goodwill or strengthen the business relationship. Small or nominal promotional items, gifts and entertainment given in the regular course of business and in accordance with local and international laws are acceptable. However, care should be taken to not provide business courtesies on a frequent or continual basis.

Providing gifts of cash or a cash equivalent, like a gift card or certificate, stocks or securities, is expressly forbidden. In addition, gifts may not be exchanged during active contract negotiations. Suppliers are also prohibited from providing business courtesies to foreign and domestic public officials and employees on Xcel Energy's behalf without prior approval.





COMMITTED

Protect Company Assets

Providing customers safe, clean, reliable energy services at a competitive price is our mission, and the resources needed to accomplish this goal are immense. Company assets include items like equipment, tools, vehicles, and supplies. Suppliers are responsible for keeping Xcel Energy assets safe from inappropriate use, theft, loss, damage or fraud and for properly using these assets in accordance with laws, rules, regulations and policies. Furthermore, taking or using company assets for unauthorized personal use is strictly prohibited.

Suppliers are expected to abide by all access, network security and badging policies.

Safeguard Intellectual Property

Suppliers may not use Xcel Energy's name or logo, trademarks or other intellectual property without the express written consent of the company. In addition, suppliers are prohibited from speaking on behalf of Xcel Energy without express written authorization.

Handle Information with Care

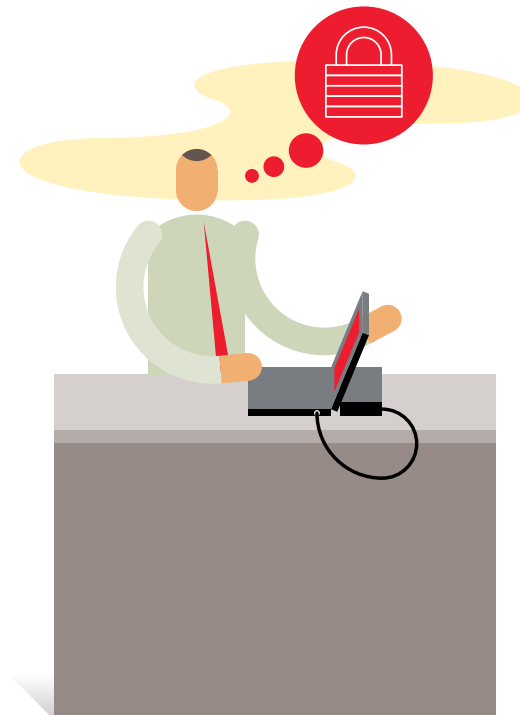
The information we create and utilize is critical to our success. Suppliers are responsible for properly managing and protecting information against loss and unauthorized access, especially confidential and confidential restricted information.

Suppliers shall not collect, store, use, disclose, dispose of or otherwise process personal data in connection with performing any work unless specifically authorized by the company in writing.

Suppliers are also prohibited from using Xcel Energy confidential information for their benefit, including making financial trades based on material nonpublic information.

Information created and contained within or transmitted via Xcel Energy's technology is the property of Xcel Energy. Suppliers are prohibited from using Xcel Energy's technology for any purpose other than performing the work authorized by the company in writing. Xcel Energy will have access to, and ownership over, all information created, communicated, transmitted and/or stored in Xcel Energy information technology systems.

In the event of an actual or suspected data security breach involving unauthorized access to company information, contact Xcel Energy's Enterprise Command Center at **612-330-6900**.



Compete Fairly

We believe in fair competition and are committed to complying with all antitrust laws and regulations. Antitrust laws prohibit any agreement or arrangement among competitors that could restrain trade. This includes agreements to fix prices, divide or manipulate markets, limit production or unlawfully restrict competition. We require our Suppliers to abide by all applicable fair competition and antitrust laws.

Never Bribe

We abide by anti-bribery and anti-corruption laws, including the Foreign Corrupt Practices Act. We deal with our customers, Suppliers, and the governments of all communities in which we operate in a straightforward and aboveboard manner.

Suppliers must not pay or receive bribes, kickbacks or unlawful payments to or from any public official, or government or other individual, whether foreign or domestic, to secure any contract, concession or favorable treatment.

This prohibition extends to the payment or receipt of money or anything else of value to consultants, agents or other intermediaries when the Supplier has reason to believe that some part of the payment will be used for a bribe or otherwise to influence action on Xcel Energy's part.

Suppliers are expected to maintain their own anti-corruption policies, conduct appropriate due diligence on the parties with whom they work, and maintain accurate books and records.





Follow Trade Laws

We are committed to complying with all applicable export control and economic sanctions laws of the United States. These laws restrict transfers, exports and sales of products, software or technical data from the United States, or re-export of such U. S. origin items from countries other than the United States to certain countries, territories and designated parties, based on the nature of the item and/or the “embargoed” status of the recipient. In some circumstances, these laws also restrict the sharing of technical data with foreign nationals located within the United States.

Suppliers are required to comply with United States export control and economic sanctions laws and are prohibited from cooperating in foreign boycotts that the United States does not support.

Appropriately Participate in Political Activities

Xcel Energy works with federal, state and local officials on political activities important to our company, employees, customers and shareholders. We make sure that our interactions are clear, transparent and in full compliance with all laws, regulations and company policies.

Suppliers are prohibited from making representations on behalf of Xcel Energy without prior approval and must ensure all interactions and relationships with public officials are professional and productive and comply with all related laws and regulations.

