

# Supplier Code of Conduct

## Introduction

Idaho Power Company's (Idaho Power) *Supplier Code of Conduct* complements the company's *Code of Business Conduct* and other standards and policies that can be found on [Idaho Power's webpage](#). This *Supplier Code of Conduct* applies directly to all suppliers and vendors providing goods or services to Idaho Power.

## Health and Safety

Safety is a core value at Idaho Power. Idaho Power is committed to the safety of its employees, customers, suppliers, and the communities in which Idaho Power operates. Idaho Power's suppliers must provide a safe and healthy working environment by exercising good judgment in work decisions; participating in Idaho Power safety training as available, reading, and complying with safety-related manuals and other materials applicable to their job, applying safe work practices and using and wearing required safety equipment and clothing; immediately notifying Idaho Power and their supervisor of any hazardous condition in the workplace, reporting any work-related incident or injury, and adhering to the industry standards with respect to safety and all applicable occupational safety and health federal, state and local laws, rules, regulations and statutes.

## Legal and Regulatory

Idaho Power suppliers and their agents shall conduct business activities in compliance with all applicable federal, state, and local laws and regulations pertaining to ethical and fair conduct. Idaho Power prohibits bribery and corruption (including as described in the *Foreign Corrupt Practice Act* and UK anti-bribery statutes), kickbacks, unethical facilitation payments, violations of anti-trust and fair-trade regulation, unfair pricing, unfair marketing, misrepresentation of products or services, corruption, and other illegal or unethical business practices.

Suppliers must also comply with all other applicable laws and regulations, including, without limitation, those associated with data security and privacy, the environment, human rights, labor, and securities (including insider trading).

## Environmental Protection and Sustainability

Idaho Power expects suppliers to understand the impact of their operations on the environment and to carry out operations in compliance with all associated environmental laws and regulations as well as continually improve resource and materials use efficiency. Suppliers are expected to obtain and maintain all applicable licenses and permits and to do business in an environmentally sound manner for the benefit of Idaho Power's customers and the diverse communities and environments in which Idaho Power provides service. Idaho Power has no obligation to but may audit and require documentation from suppliers regarding their sustainability risks, compliance with environmental laws and regulations, and commitment to environmental sustainability and stewardship. Suppliers shall report environmental concerns or spills to Idaho Power at 208-388-5353.

## Conflicts of Interest

Conflicts of interest arise when loyalties are divided between obligations to Idaho Power and a supplier's own interests. The best way to avoid actual or perceived conflicts of interest is to provide full written disclosure (to an Idaho Power Supply Chain manager or Idaho Power's business conduct advisor) of a potential situation before the conflict occurs. Suppliers shall provide written disclosure of any situation that creates, or appears to create, a conflict of interest prior to entering into any business transaction with Idaho Power. If a potential conflict (actual or potentially perceived) arises during the business transaction, the supplier must promptly disclose the potential or perceived conflict in writing after it becomes known.

## Business Records

Accurate records are critical to Idaho Power meeting its legal, financial, and regulatory obligations. A supplier's operational and accounting records in connection with creating, maintaining, and disposing of records reflecting their business dealings with Idaho Power must be accurate and in compliance with all applicable laws and regulations. Suppliers are responsible for safeguarding confidential documents, compliance with data privacy and security laws and requirements, and adhering to the terms of confidentiality agreements with regard to handling of business records. In some cases, business records may need to be returned to Idaho Power.

## Human Rights and Labor Practices

Idaho Power is guided by its core values of safety first, integrity always, and respect for all and is committed to protecting human and workplace rights in its operations, and to treating employees and suppliers fairly, ethically, and without discrimination. Idaho Power's suppliers shall treat their employees,

customers, regulators, and the public with dignity, respect, and fairness and shall provide a safe and healthy working environment for employees.

All Idaho Power suppliers shall comply with all applicable federal, state, and local labor and employment laws, including but not limited to, those associated with equal employment opportunity and non-discrimination, immigration, working hours, wages and benefits, freedom of association, collective bargaining, health and safety, employee privacy, workplace violence prevention, and a harassment-free work environment. Idaho Power prohibits the use of child labor, forced or compulsory labor and any form of human trafficking or slavery, and working hours that exceed the maximum set by local law.

Idaho Power respects and expects its suppliers to abide by standards that protect the basic rights of all human beings, based on the fundamental provisions of the Universal Declaration on Human Rights, as established by the General Assembly of the United Nations, the International Labor Organization's Declaration of Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Idaho Power expects its suppliers to share its same commitment to conducting business ethically, honestly and with mutual respect for the rights of all people. Idaho Power may, but has no obligation to, audit or oversee suppliers' operations or practices with respect to these principles. Failure to comply with these requirements could result in consequences, including but not limited to, the termination of Idaho Power's business relationship with the supplier.

## Company Resources and Confidentiality

Suppliers shall safeguard Idaho Power resources and use them responsibly and only for legitimate business purposes. Idaho Power resources include, without limitation, company facilities, equipment, systems, technology assets, information, electrical power, and office and field supplies. Suppliers shall not use, reproduce, access, modify, download, distribute, or otherwise copy Idaho Power's name, logo, trademarks, or other intellectual property without the expressed written consent of Idaho Power. Suppliers and their employees are also prohibited from using Idaho Power resources or facilities to solicit or distribute information or materials not connected with regular Idaho Power work.

Any information provided to suppliers by Idaho Power, including employee and customer information, shall be maintained in compliance with, among other things, applicable laws and regulations, and the supplier's agreement with Idaho Power. Confidential information, whether expressly designated as such or which would commonly be considered confidential in the industry, shall be shared only within the supplier's organization on a need-to-know basis, as permitted by law, and in accordance with the supplier's agreement with

Idaho Power. Unless stated otherwise in the supplier's agreement with Idaho Power, suppliers shall not share Idaho Power's confidential information with third parties without the expressed written permission of Idaho Power.

## Business Gifts and Courtesies

Whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence, or appear to influence, a business decision. Exchanging modest gifts and courtesies may be acceptable under certain conditions, but it is never required for doing business with Idaho Power. Suppliers shall never offer or provide personal incentives or rewards for doing business with Idaho Power employees to influence a business decision. Providing cash or a cash equivalent (including gift cards) of any kind to an Idaho Power employee is strictly prohibited.

## Questions or Concerns

It is the responsibility of the supplier to ensure their representatives who deal with Idaho Power understand and comply with this *Supplier Code of Conduct* and report any instances of non-compliance. If preferred, reports may be submitted anonymously. You may make inquiries or reports to Idaho Power's business conduct manager at 208-388-6401, or to the Business Conduct Hotline at 1-877-606-9186.