



September 2026

Code of Business Ethics

**Living Our Values.
Doing the Right Thing.**

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Our Commitment

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Message from Our Leadership

At XKIG, our work powers communities, protects critical infrastructure, and supports the essential services people rely on every day. The trust placed in us by our employees, customers, business partners, and communities is one of our most valuable assets. How we achieve results matters just as much as the results themselves.

This Code of Business Conduct & Ethics establishes the standards that guide our decisions and actions. It applies to all employees, officers, directors, temporary workers, and anyone representing or acting on behalf of XKIG and its operating companies.

Randolph Hoover
CEO



Mission, Vision & Values

Mission

Empowering every team member to safely and professionally support our customers' mission to deliver reliable energy to the communities they serve.

Vision

Foster an environment of personal and professional growth while leveraging technology and innovation to deliver unmatched value to our customers.

Values



Trust

Act with integrity, make thoughtful choices that best meet the situation, and follow through on commitments.

We act honestly, make sound decisions, and follow through on what we say we will do. We earn trust by taking responsibility for our actions, doing the right thing even when difficult, and honoring our commitments.



Transparency

Timely, clear, open, and honest communication.

We keep people informed, ask for help when needed, and speak openly about what is working and what is not. Good communication and transparency help everyone understand the task and how to work together more effectively.



Respect

Maintain dignity with our words and actions.

We listen to diverse ideas, use kind and professional language, and value each person's contributions. We show respect through our words, actions, and attitudes, creating a workplace where everyone feels welcome and valued.



Unity

Working together for mutual success.

We help one another, share knowledge, and celebrate success together. By supporting each other and putting the team first, we can accomplish more than we can on our own. When we practice unity, we all win.

Safety: Our First Obligation



We believe:



Every injury is preventable.



Every employee has the authority and responsibility to stop unsafe work.



No task is so urgent or important that it cannot be completed safely.



Looking out for one another is part of our culture.

What We Expect

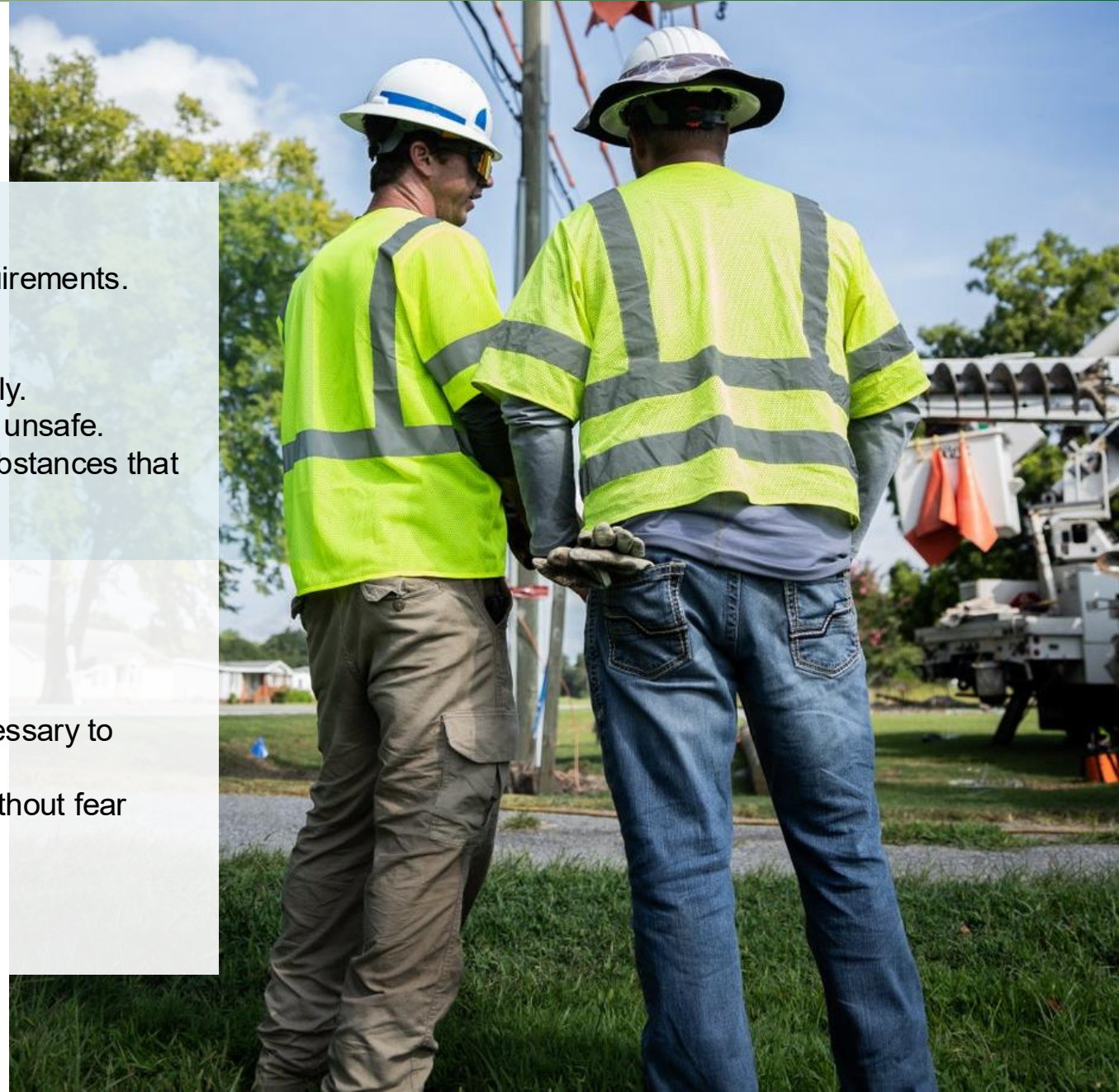
All employees and others performing work on our behalf must:

- Follow all applicable safety rules, procedures, and training requirements.
- Wear required personal protective equipment.
- Conduct work safely and responsibly.
- Report hazards, incidents, injuries, and near misses immediately.
- Stop work and escalate appropriately when conditions become unsafe.
- Never work while impaired by alcohol, illegal drugs, or other substances that could affect safety or judgment.

In addition, Leaders must:

- Lead by example.
- Address hazards promptly.
- Provide employees with the tools, equipment, and training necessary to work safely.
- Foster an environment where safety concerns can be raised without fear of retaliation.

**Protecting people is our first obligation
and our highest priority.**



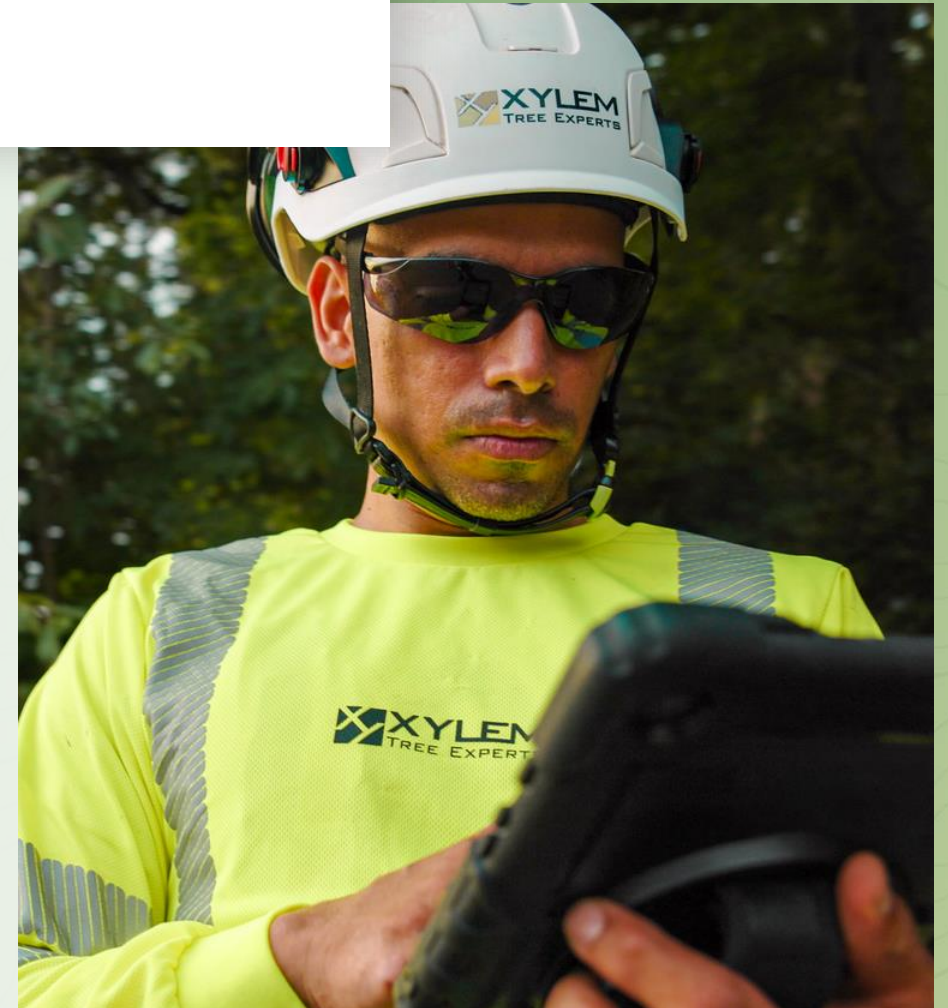
Making Ethical Decisions

Ethical issues are not always clear, and making the right decision can sometimes be difficult.

Before making a decision, ask yourself:

- Is it safe?
- Is it legal?
- Is it consistent with our values, this Code, and company policies?
- Is it honest and transparent?
- Would I be comfortable if it appeared on the front page of a newspaper?
- Will it preserve or strengthen trust in XKIG?

If the answer to any of these questions is “No” or “I’m not sure,” stop and seek guidance. When seeking guidance, contact your supervisor, another member of management, Human Resources, Governance and Compliance, or Legal.



Standards of Conduct



1 | Respectful Workplace & Anti-Harassment

We are committed to maintaining a workplace where employees, customers, visitors, or those doing business with XKIG or its operating companies are treated with dignity and respect.

What XKIG prohibits:

- Harassment:** unwelcome conduct based on protected characteristics that is severe or pervasive in nature.
- Discrimination:** the unfair or less favorable treatment of an employee or job applicant because of certain personal characteristics protected by law.
- Bullying:** seeking to harm, intimidate, or coerce someone perceived as vulnerable.
- Intimidation:** the action of intimidating someone, or the state of being intimidated.
- Threats of violence:** any verbal, written, or behavioral action that conveys an intent to cause physical harm or instill fear of harm.
- Retaliation:** when an employer fires or takes any other type of adverse action against an employee for engaging in protected activity.

- Prohibited conduct may include:
- Offensive jokes or comments.
 - Unwelcome sexual advances.
 - Derogatory language.
 - Threatening behavior.
 - Displaying inappropriate materials.
 - Excluding or mistreating others based on personal characteristics.

Every employee is expected to contribute to a respectful workplace and report suspected harassment, discrimination, threats, or retaliation.

2 | Conflicts of Interest

Employees must make business decisions in the best interests of XKIG.

A **conflict of interest** may arise when personal, financial, or outside interests interfere—or could reasonably appear to interfere—with an employee's responsibilities to XKIG.

Examples may include:

- Supervising or influencing employment decisions involving family members or someone with whom the employee has a close personal relationship.
- Holding a financial interest in a supplier, contractor, customer, or competitor.
- Using company opportunities for personal gain.
- Operating outside businesses that interfere with work responsibilities.
- Accepting personal benefits in exchange for business decisions.

Actual, potential, or apparent conflicts must be disclosed promptly to a supervisor, Governance & Compliance, or Legal. Disclosure does not necessarily mean that the activity is prohibited. It allows XKIG to evaluate the circumstances and determine whether safeguards are needed.

When in doubt, disclose the situation and seek guidance.



3

Gifts & Hospitality

Business decisions must never be influenced, or appear to be influenced, by gifts, meals, travel, entertainment, or other favors or benefits.

Employees may accept or provide reasonable business courtesies when they:

- Are infrequent.
- Have a legitimate business purpose.
- Are reasonable in value.
- Comply with applicable laws and company policies.
- Do not create the appearance of improper influence.



Employees may never:

- Offer or accept cash or cash equivalents, including gift cards.
- Solicit gifts.
- Accept lavish or excessive hospitality.
- Exchange gifts, meals, travel, or entertainment during an active bid, vendor-selection, procurement, or contract-renewal process.

If you are unsure, seek guidance before accepting or providing a gift.

Anti-Bribery & Corruption

XKIG has zero tolerance for bribery and corruption.

Employees may never:

- Offer, promise, or provide anything of value to improperly influence a decision.
- Request or accept improper payments or favors.
- Use third parties to circumvent ethical or legal requirements.
- Participate in kickbacks or other corrupt practices.

Special rules apply when dealing with government officials, public agencies, and government-owned or regulated entities. Employees must seek guidance before providing anything of value in connection with such interactions.

We earn business through performance, quality, safety, and trust — not improper influence.



5 | Accurate Books & Records

Accurate information is essential to operating responsibly and maintaining trust.

All business records must be:

- Accurate.
- Complete.
- Timely.
- Properly authorized.
- Supported by appropriate documentation.

This includes, but is not limited to:

- Timecards.
- Payroll records.
- Expense reports.
- Safety documentation.
- Vehicle inspections and maintenance.
- Training records.
- Financial reports.
- Personal documentation and identification.
- Customer information and project records.
- Regulatory submissions.
- Invoices.



Employees may never:

- Falsify or alter records — including timecards, crew attendance, or reports of completed-work.
- Misrepresent facts.
- Conceal, destroy, or improperly omit information.
- Create misleading documentation.

Employees must comply with applicable record-retention requirements and preserve records related to an audit, investigation, claim, subpoena, or legal hold.

Mistakes should be reported and corrected promptly.

6 | Confidentiality & Data Protection

Information entrusted to us must be protected.

Employees are responsible for safeguarding information such as:

- Employee information.
- Customer information.
- Financial information.
- Proprietary business information.
- Contract information.
- Trade secrets.
- Personal data.

Employees must:

- Protect passwords and credentials.
- Follow cybersecurity requirements.
- Use company technology responsibly.
- Access, use, and share information only when authorized and necessary for a legitimate business purpose.
- Immediately report suspected loss, unauthorized access, phishing, cybersecurity incidents, or disclosure of confidential or personal information.



Confidential information must never be disclosed without authorization. Confidentiality obligations continue after employment or service with XKIG ends.

7 | Use of Company Assets

Employees are entrusted with company resources and are expected to use them responsibly.

Employees must:

- Protect company property.
- Prevent waste, theft, fraud, and misuse.
- Use resources responsibly.
- Report suspected misuse or theft.

Company assets are provided to support business operations. Any limited personal use must comply with company policy and must not interfere with work or create additional cost or risk.



Company assets may include:

- Data.
- Work time.
- Vehicles.
- Equipment.
- Tools.
- Fuel cards.
- Mobile devices.
- Computers.
- Facilities.
- Company funds.
- XKIG's name, brand, and intellectual property.

8 | Environmental Stewardship



As a company that works closely with the environment and critical infrastructure, we recognize our responsibility to operate responsibly and sustainably.

Employees must:

- Follow environmental laws and regulations.
- Makes efforts to prevent pollution and environmental harm.
- Report spills, releases, or environmental incidents immediately.
- Protect natural resources whenever possible.
- Follow applicable environmental procedures, permits, plans, and reporting requirements.

Environmental stewardship supports our customers, communities, and future generations.



9 | Compliance with Laws & Regulations

We comply with all applicable laws, regulations, and contractual obligations wherever we operate.

This includes, but is not limited to:

- Safety requirements.
- Environmental regulations.
- Employment laws.
- Wage and hour requirements.
- Transportation regulations.
- Procurement requirements.
- Privacy laws.
- Anti-corruption laws.

Employees must seek guidance from Legal, Governance & Compliance, or the responsible subject-matter expert whenever a legal, regulatory, or contractual requirement is unclear.



10 | Fair Competition



XKIG competes fairly and complies with applicable competition and antitrust laws.

Employees must not collude with competitors regarding pricing, customers, territories, bids, wages, or other competitively sensitive matters. Competitor information must be obtained and used lawfully. Employees must contact Legal before entering into arrangements or participating in discussions that could restrict competition.



11 | Social Media & Public Communications

Employees play an important role in protecting XKIG’s reputation.

Only authorized individuals may speak or communicate on behalf of XKIG or an operating company. Media, investor, and other external inquiries must be referred to Marketing & Communications.

Employees should:

- Be respectful online.
- Protect confidential information.
- Avoid misleading or inaccurate statements.
- Make clear that personal opinions are their own and do not represent XKIG.
- Avoid making any derogatory social media posts regarding XKIG, its affiliates, or customers.

What we say publicly reflects on our company, coworkers, and customers. Employees found to be making derogatory, callous, or incendiary social media posts or comments may result in disciplinary action, up to and including termination of employment.



12 | Speaking Up

Integrity requires courage. Employees are expected to promptly report known or suspected violations of law, this Code, or company policy, including concerns involving:

- | | | | |
|-------------------|--------------------------|---|--|
| • Safety. | • Fraud. | • Misconduct. | • Environmental violations. |
| • Ethics. | • Theft. | • Accounting or financial-reporting concerns. | • Data privacy or cybersecurity incidents. |
| • Harassment. | • Compliance violations. | • Bribery or kickbacks. | |
| • Discrimination. | • Conflicts of interest. | | |

Retaliation. Concerns may be reported through:

- Your supervisor.
- Another member of management.
- The Ethics & Integrity Hotline.
 - Number
 - website

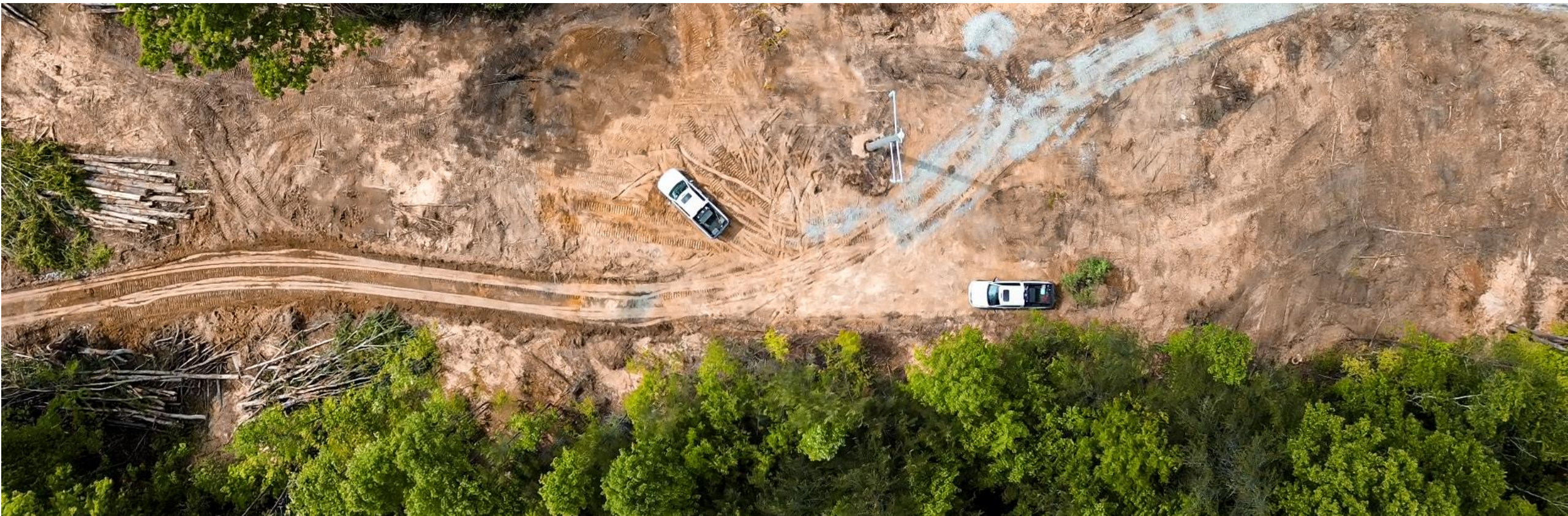
Reports may be made confidentially and, where permitted by law, anonymously. XKIG will protect confidentiality to the extent reasonably possible while conducting an appropriate review. Employees should not report a concern to anyone involved in the suspected misconduct.

Leaders who receive a report of suspected misconduct must promptly escalate it to Human Resources, Governance & Compliance, or Legal and must not investigate the matter independently unless directed to do so.

13 | Investigations and Cooperation

XKIG reviews reported concerns promptly, fairly, and objectively.

Employees must cooperate honestly, preserve relevant information, and maintain confidentiality as directed. Employees may not interfere with an investigation or retaliate against anyone who participates.



14 | Non-Retaliation

XKIG strictly prohibits retaliation against any person who, in good faith:

- Raises a concern.
- Requests guidance.
- Reports misconduct.
- Reports a safety concern.
- Participates in an investigation.
- Refuses to participate in conduct reasonably believed to violate the law, this Code, or company policy.

Retaliation is itself a violation of this Code and may result in disciplinary action, up to and including termination of employment. Retaliation may include threats, intimidation, harassment, demotion, exclusion, unfavorable assignments, or other conduct intended to discourage good-faith reporting or participation in an investigation.

Speaking up helps protect our employees, customers, and company.



Accountability

Everyone subject to this Code is accountable for understanding and complying with it.

Leaders and supervisors have an additional responsibility to:

- Lead by example.
- Promote ethical conduct.
- Support employees who raise concerns.
- Take appropriate action when issues arise.
- Promptly escalate reported or suspected misconduct.
- Protect employees who raise concerns from retaliation.
- Never direct or pressure an employee to achieve results through conduct that violates law, this Code, or company policy.

Violations of this Code may result in:

- Coaching or retraining.
- Disciplinary action.
- Termination of employment.
- Legal action when appropriate.
- Referral to law enforcement or regulatory agencies when appropriate.

Knowingly failing to report serious misconduct, concealing a violation, intentionally making a false report, or failing to cooperate honestly in an investigation may also result in disciplinary action.

Our Commitment

Supporting America's Utilities and the Communities They Serve

Our Mission: Empowering every team member to safely and professionally support our customers' delivery of reliable energy to the communities they serve.

Our Vision: Foster an environment of personal and professional growth while leveraging technology and innovation to deliver unmatched value to our customers.

Our Values: Trust, Transparency, Respect, and Unity

Resources

Online: xkig.ethicspoint.com

Hotline: 1-833-730-4370