

# Supplier Code of Conduct



# Southern Company's Commitment

At Southern Company\*, our mission to provide clean, safe, reliable, resilient and affordable energy is about more than our bottom line. We take considerable pride in developing strong, long-term and trusting relationships with suppliers that will help drive value for our company and our customers.

Southern Company serves diverse communities throughout the country, and we work with suppliers and partners who reflect that diversity. Our company is stronger and more successful when we honor the diversity of people and ideas. We offer programs that support small businesses and enterprises owned by minorities, women, veterans, service-disabled veterans, disabled veterans, LGBTQ+ and disabled individuals that offer quality goods and professional services. We provide solid business opportunities to these suppliers in the procurement process.

How we do our work is just as important as what we do. We are committed to supporting and improving our communities and environment at the local level and beyond, while conducting business with honesty, integrity and fairness. In alignment with our mission, we have developed the Southern Company Supplier Code of Conduct, which is applicable to Southern Company and our subsidiaries. As a trusted Southern Company supplier, we expect your commitment to these important principles.

## Introduction

**Compliance with the Supplier Code of Conduct is an expectation of doing business with Southern Company and our affiliates. This Code of Conduct defines the minimum standards we ask our suppliers and their sub-tier suppliers or sub-contractors to adhere to and respect. As our mission continues to evolve, we may change, modify or add to the Southern Company Code of Conduct at any time.**

### Supplier Code of Conduct elements

- Ethical and legal compliance
- Environment
- Sustainability
- Child labor
- Fundamental human rights
- Remuneration
- Occupational health and safety
- Business ethics
- Right to collective bargaining
- Forced labor
- Privacy and intellectual property
- Reporting issues

### Ethical and legal compliance

At Southern Company, we are committed to conducting business with honesty, integrity and fairness. An essential part of this commitment is our requirement that we conduct our business in compliance with all applicable laws and regulations.

We also expect our suppliers to conduct themselves with honesty, integrity, fairness and a commitment to legal compliance. Suppliers are expected to comply with all applicable laws and regulations and certain Southern Company policies, and to communicate these expectations to their agents, subcontractors, suppliers, representatives and employees that assist them in meeting their obligations to Southern Company.

Southern Company and its subsidiaries are committed to ethical and legal compliance. The Southern Company Code of Ethics outlines how ethical behavior applies to every part of our business. The Southern Company Code of Ethics can be found here: [Code of Ethics](#).

\*The terms we, us and our all refer to Southern Company. Southern Company is a holding company that conducts its business through its subsidiaries. Accordingly, unless the context otherwise requires, references on our website to Southern Company's operations, such as generating activities, greenhouse gas emissions and employment practices, refer to those operations conducted through its subsidiaries.





## Environment

We expect our suppliers to use reasonable efforts to work to identify and implement opportunities to reduce or eliminate waste and pollution at its source and to continually improve resource and materials use efficiency. Southern Company encourages its agents and suppliers to minimize any negative environmental impact of the goods and services they provide. We are supportive of suppliers that share our commitment to protecting the environment and the communities we serve.

## Sustainability

Southern Company prioritizes the delivery of clean, safe, reliable, resilient and affordable energy to our customers. We know that building a successful and sustainable business means delivering the same exceptional service our customers expect today, while transforming to meet expectations for tomorrow's new economy, including a net zero future. To see more about Southern Company's sustainability strategy, see [Sustainability | Southern Company](#).

We expect suppliers to share our commitment to the communities we serve. We also expect our suppliers to support workforce sustainability, foster a diverse, inclusive, equitable and innovative culture, and use best efforts to commit to a diverse supply chain.

## Child labor

Suppliers will not employ any person under the minimum legal age for employment as prescribed by the relevant local authority. Legitimate workplace

apprenticeship programs, which comply with all laws and regulations, are allowed. Workforce members will only perform work in accordance with applicable laws, including applicable laws with respect to minors performing work that may expose them to hazards.

## Fundamental human rights

Discrimination or harassment of any kind or character, based on race, color, religion, sex, national origin, age, disability, veteran status, genetic information, sexual orientation, gender identity or expression, or any other basis prohibited by applicable law, including but not limited to conduct or language derogatory to any individual that creates an intimidating, hostile, or offensive working environment, will not be tolerated. Specific examples include, but are not limited to, jokes, pranks, epithets, written or graphic material, or hostility or aversion toward any individual or group. Suppliers are expected to comply with all applicable immigration laws, including the Immigration Act of 1990.

Suppliers are expected to treat people with dignity and respect, encourage diversity and diverse opinions, promote equal opportunity for all and help create an inclusive and ethical culture. Southern Company expects that suppliers will treat everyone fairly and honestly.

## Remuneration

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

## Occupational health and safety

### • Public safety

Suppliers will use best efforts to identify and eliminate all potential public safety hazards associated with any activity, service or product or equipment/tool deployed in the execution of service for or on behalf of Southern Company. Where hazards cannot be eliminated, they will be controlled to within acceptable regulatory limits and recognized industry practices. Appropriate public engagement, communication and access control shall be undertaken to minimize hazard exposure and harm to the public.

### • Occupational safety

Suppliers should identify workforce exposure to safety hazards via risk assessments and job safety analysis. Hazards should be eliminated or controlled through proper design, engineering, procedural controls, and ongoing safety training. Where hazards cannot be adequately controlled by these means, the workforce will be provided with appropriate, well-maintained personal protective equipment. As critical partners in avoiding workplace injuries, Southern Company suppliers are encouraged to report near misses. They are empowered and expected to stop the job if they observe work being performed in an unsafe manner by either a Southern Company employee or Southern Company supplier conducting Southern Company-related work or working around a Southern Company facility.

### • Vehicle safety

Suppliers will ensure that all vehicles used, and transportation activities undertaken in the execution of Southern Company business are compliant with applicable department of transportation and department of motor vehicles regulations and codes. When operating a vehicle for Southern Company business, drivers will carry a valid driver's license, always comply with applicable vehicle code, and operate their vehicle safely, including minimizing all distractions while driving and obeying all posted road regulations.

### • Industrial hygiene

Occupational hygiene and medical surveillance methods will be implemented by the supplier for all applicable work activities to identify, eliminate and/or control workforce exposure to chemical, biological and physical agents and to provide ongoing monitoring and surveillance of affected personnel. Engineering or administrative controls will be used to control overexposures. When hazards cannot be adequately controlled by such means, the health of the workforce will be protected by appropriate personal protective equipment and programs.

### • Drugs and alcohol

All individuals are prohibited from possessing, selling, distributing, using or being under the influence of alcohol or illegal drugs on company property. Unless otherwise prohibited by state or local law, supplier personnel may be required to submit to a urinalysis, breath analysis, blood test or other appropriate tests to identify the inappropriate presence of alcohol or drugs.

### • Workplace environment

Suppliers should not tolerate any conduct or acts, such as threats or violence that create a hostile, abusive or intimidating work environment.

### • Working hours

Suppliers will not require their workforce to work beyond daily and weekly work hour limits as defined and required by local, state/provincial and federal/national law.



## Business ethics

### • Anticorruption

Southern Company has a zero-tolerance policy for corruption and prohibits anyone conducting business on behalf of Southern Company, including suppliers, from offering or making any improper payments of money or any other improper items of value to government officials, political parties, candidates for public office or other persons. This includes the offer and/or receipt of any bribe or kickback to and/or from any customer, supplier or others. Suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

### • Anti-competitive practices

Anti-competitive practices are prohibited. This includes avoiding business practices such as entry into arrangements that unlawfully restrain competition, improper exchange of competitive information, price fixing, bid-rigging or improper market allocation.

### • Conflict of Interest

Suppliers' goal should be to avoid engagement in any activity that creates a conflict of interest or appearance of the same, or that jeopardizes the integrity of Southern Company or itself or other Southern Company suppliers. This includes providing gifts, entertainment or trips to Southern Company personnel that are not part of a reasonable business relationship. Southern Company resources will only be used in the interest or performance of Southern Company business.

### Right to collective bargaining

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

### Forced labor

Southern Company prohibits the use of forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude and all forms of

human trafficking. This includes the use of any form of threat, force, coercion, fraud or exploitation. All members of the suppliers' workforce will understand the terms of their employment. Withholding of, or destruction of, employee identity or immigration documents, passports or work permits is prohibited.

### Privacy and intellectual property

Suppliers will act lawfully and with integrity in handling competitive data, proprietary information and other intellectual property. Suppliers will comply with legal requirements regarding fair competition and antitrust, and accurate and truthful marketing.

### Reporting issues

Southern Company prohibits retaliation in any form against a person for reporting a compliance or ethical issue or for any other reason. Southern Company's goal is to have a work environment where employees and suppliers feel safe to report issues without fear of retaliation or retribution. Southern Company expects its suppliers to protect an individual's right to report misconduct or noncompliance with regulations or other ethical issues. Suppliers must comply with Whistleblower laws, including those promulgated by the Securities and Exchange Commission (SEC) and Commodities Futures Trading Commission (CFTC). These laws include requirements such as protecting the individual from retaliation and providing confidential reporting mechanisms.

If you observe Southern Company personnel or personnel of Southern Company suppliers, doing, or are ever asked by a Southern Company personnel or supplier to do, something that you believe to be unethical, illegal or in violation of the applicable behavior standards, please notify Southern Company management immediately. In addition, we expect you to immediately report any violations of this Supplier Code of Conduct to Southern Company management or by contacting the Concerns Program. To contact the Concerns Program and for options to file a concern or report violations of this Supplier Code of Conduct, visit [yourconcernmatters](https://yourconcernmatters.com) or email [concerns@southernco.com](mailto:concerns@southernco.com).



# Concerns Program

This Supplier Code of Conduct, the Southern Company Code of Ethics and Southern Company's values call on each of our suppliers and personnel to act with honesty and integrity. When that doesn't happen, the Concerns Program is a resource to report a wide range of illegal or unethical behaviors. All Southern Company system employees and suppliers can use the program.

You can contact the Concerns Program one of several ways and can do so anonymously.



Call the confidential hotline at 1-800-492-3902



File a concern online at [yourconcernmatters.southerncompany.com](https://yourconcernmatters.southerncompany.com)



Mail a letter  
Southern Company Concerns Program  
P.O. Box 54384, Atlanta, GA 30308-9998



Send an email to Concerns at [concerns@southernco.com](mailto:concerns@southernco.com)

Whichever method you choose, your concern will be investigated quickly and objectively, and appropriate corrective action will be taken when necessary. All concerns are treated confidentially and the company does not tolerate retaliation against anyone for filing a concern.

