



CenterPoint Energy

ETHICS AND COMPLIANCE CODE



CenterPoint Energy

ETHICS AND COMPLIANCE CODE

Ethics and Compliance Department
CenterPoint Energy, Inc.

Concerns Helpline
1-888-888-3155

or

centerpointenergy.com/ethics



This Code is not an employment contract between you and CenterPoint Energy, nor does it replace our employment policies and work rules. Employment with CenterPoint Energy is "at will," which means that you or CenterPoint Energy may terminate your employment, with or without cause and with or without notice. Employees who violate this Code are subject to disciplinary action, up to and including termination of employment.

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Welcome

Dear colleagues,

Over the past 150 years, CenterPoint Energy has been committed to delivering safe and reliable energy to millions of customers. I want to personally thank each of you for your commitment to our success and the execution of our strategy of **Delivering with Focus**, which will help us achieve our goal of becoming a premium valued utility.

CNP's core values of **Safety, Integrity, Accountability, Initiative** and **Respect** provide the foundation for our business practices and standards and apply to all of us. We hold these values true in everything we do at CNP. By investing in and empowering our greatest assets – **our employees** and by living our values every day and maintaining the highest ethical standards, we help ensure our company's future success for years to come.

Our Ethics and Compliance Code forms the foundation for who we are and how we conduct business. Values-based conduct, in addition to being the right way, is simply good business. The Code explains many of the basic rules that will guide us. Please take the time to review the Code, and commit yourself to always doing things the right way at CNP.

If you have any questions about the Code please reach out to our Ethics and Compliance department.

You are an essential part of our company's success, and I appreciate the work that you do every day. By thinking and acting in ways that support our values, we can maintain an ethical culture that we can all be proud of. We will continue to emphasize the importance of ethics, compliance and integrity as we build on our track record of delivering more than a century of trusted service.

Thank you,



Dave Lesar

President & Chief Executive Officer



Our Vision & Values

Over the past 150 years, CenterPoint Energy, Inc. (“CenterPoint Energy” or the “Company”) has grown from a number of local businesses into a Fortune 500 company delivering electricity and natural gas to more than 7 million customers. From customer representatives answering calls, to skilled technicians and line mechanics weathering extreme conditions, we work around-the-clock so our customers have electricity and natural gas delivered safely and reliably to their homes and businesses.



Our Company and culture are centered around our five values. We live these values everyday through our actions and commitments.

Safety

We remain committed to safety. We strive to instill a culture of safety excellence at all levels of our Company. We will perform our duties safely or we won't do them.

Integrity

We do what is right for our customers, our communities, our shareholders, our business partners, and each other. Without fail, we follow our values, our rules and policies, and the law.

Accountability

We are straightforward in our actions and truthful in our relationships. When we say we will do something, we follow through and keep our commitments. We accept personal responsibility for our decisions. We are all accountable for making sure our own conduct reflects and supports our values-based culture.

Initiative

We are not afraid to take bold and innovative action. We make hard decisions and tackle tough choices. We speak up. We use our resources and assets wisely.

Respect

We show respect to everyone. How we treat our fellow employees and customers is just as important as the results that we achieve. We are considerate and show appreciation for diverse thinking. Every individual with whom we work deserves our best efforts. We are responsible to our stakeholders and work to earn their trust every day.

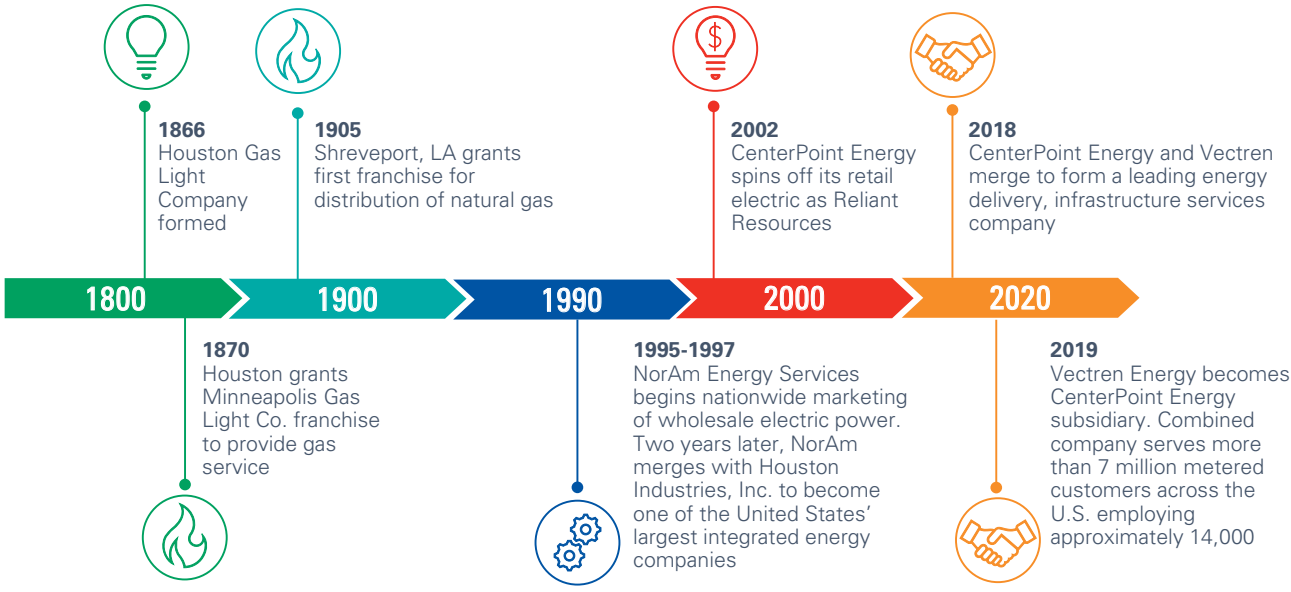
Our Vision & Values *(continued)*



Our History & Values

CenterPoint Energy’s beginning dates back to the 1866 formation of Houston Gas Light Company, a southeast Texas company supplying gas made from oyster shells and coal. Our commitment to our customers and our culture has driven our growth for more than 150 years. As the Texas electric market developed and changed, in 2002, CenterPoint Energy emerged from Houston Electric Light & Power as an energy delivery company, named after our central role in the energy market and our customers’ lives. In early 2019, Vectren merged with CenterPoint Energy expanding our business and allowing us to more fully serve our customers, both old and new.

We officially adopted our core values of Integrity, Accountability, Initiative, and Respect in 2004. In 2013, we added Safety as our first value. Today, we work consistently to develop and enhance a culture based on our values through our ethics and compliance policies, workforce and supplier diversity programs, environmental and energy conservation initiatives, and our community relations activities.



Our Vision & Values *(continued)*

The Code Applies to All of Us

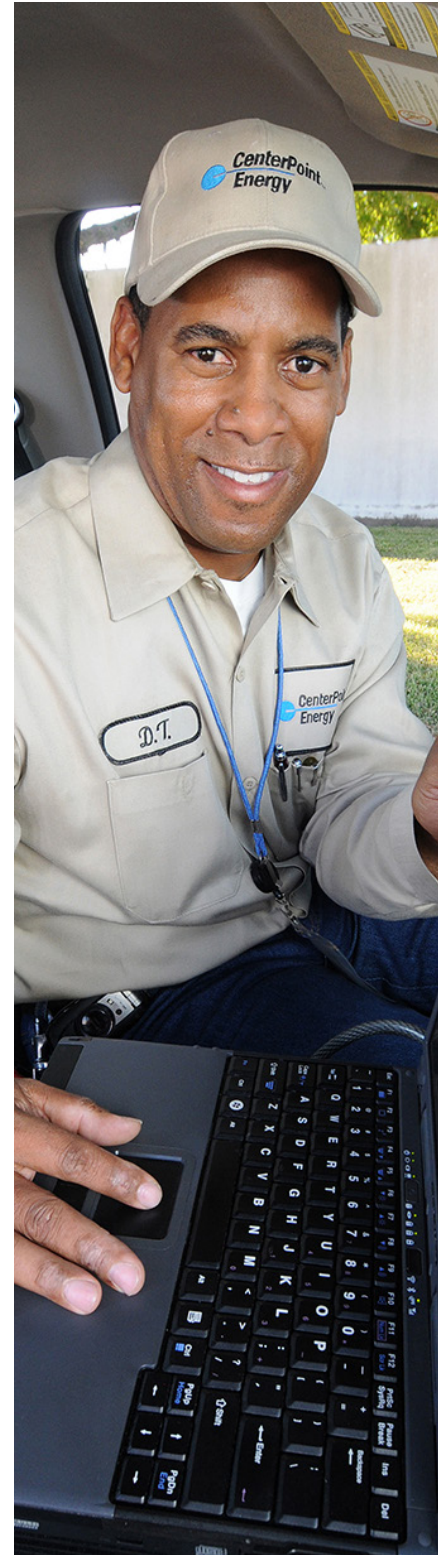
Our Ethics and Compliance Code (“Code”) is organized around our customers and values. Our Code provides an overview of the laws, regulations, and policies applicable to each of us and the work we do. Following the Code honors our history and builds trust with our customers and communities. While this Code is not an employment contract, it serves as a roadmap incorporating our values into the decisions we each make every day. If you have any questions regarding the Code or our policies, contact the Ethics and Compliance department at Compliance.Officer@centerpointenergy.com.

The Code applies to everyone at the Company and is a starting point for working by and living our values. CenterPoint Energy expects every employee to act with personal and professional integrity, follow all applicable laws and regulations, and any additional policies and procedures which may apply according to an employee’s role. If employees do not follow the Code, Company policies or procedures, or applicable laws or regulations, CenterPoint Energy may take disciplinary action, up to and including termination. Because our Code is central to our mission of serving our customers, we expect our suppliers, vendors, and other third parties with whom we do business to live the same values as our employees. Specific requirements and expectations for third parties are outlined in the **Ethics and Compliance Code of Conduct for Consultants, Contractors, Suppliers and Vendors** (“Supplier Code”).

Waivers of the Code

CenterPoint Energy’s Ethics and Compliance department, and in some cases CenterPoint Energy’s Board of Directors, must approve any waiver of change to the Code.

CenterPoint Energy has detailed policies and procedures dealing with topics throughout the Code. For more information, visit [CenterPoint Energy’s Policy Center](#). You can also ask your supervisor or contact Ethics and Compliance with questions.



Our Vision & Values *(continued)*

Employee Accountability

CenterPoint Energy employees protect our ethical culture. It is our responsibility to live our core values and model accountability by promoting a work environment where people can count on each other. We expect employees at all levels to honor their commitments.

As employees:

- We read, understand, and follow our Code and other applicable policies and rules;
- We stay informed and educated through our training opportunities;
- We cooperate with internal investigations and respect the non-retaliation policy;
- We seek advice, ask questions, and provide feedback; and
- We protect, manage, and use resources wisely.



Manager & Supervisor Accountability

Managers and supervisors lead by our values, this Code, and our policies, in their words and their actions. CenterPoint Energy expects managers and supervisors to provide timely guidance and advice and communicate openly and honestly with employees.

As managers and supervisors:

- We set the right tone by acting ethically;
- We incorporate our values into communications, training, and awareness materials;
- We facilitate the reporting and investigations process and take prompt action to correct issues;
- We encourage employees to seek advice, ask questions, and provide feedback; and
- We protect CenterPoint Energy's reputation as a values-driven company.



Supervisors and managers have the responsibility to report any concerns about possible unethical or illegal behavior to a more senior manager or the Ethics and Compliance department.

Our Vision & Values *(continued)*

Asking Questions or Reporting Concerns

Our reputation, our relationships, and our future depend on a commitment to ethics and compliance. If you see someone violating the Code, you must say something. Misconduct or bad choices – including failure to report concerns – can impact everyone. You may report your concern to any direct supervisor or manager, the Concerns Helpline, the Ethics and Compliance department, or any other member of management (for example, Human Resources, Audit Services, Legal Department, or Corporate Security). Sometimes you may be unsure whether something is an ethics concern. Report it anyway. We can help figure out how to best address the issue.

Your manager or supervisor may be able to help you. You also may want to contact the Concerns Helpline or go directly to the Ethics and Compliance department. The more detail you provide, the more effectively CenterPoint Energy can review and investigate the issue.

Sometimes, it's not easy to figure out the right thing to do, but the important thing is to get help. Never hesitate to speak up when something does not look or feel right, even if it is just to ask a question. Make sure what you report is in good faith and accurate to the best of your knowledge. Our reporting process does not work when someone reports false or misleading information. Misreporting violates our Code and threatens our culture. CenterPoint Energy requires employees to cooperate fully with the reporting and investigations process.

We take your concerns seriously. Once you make a report, we will review it and determine how to best address your concern including, where appropriate, starting an impartial, fair, and thorough investigation. If an investigation reveals a violation of our standards, we will address it accordingly.

Non-Retaliation Policy

CenterPoint Energy takes all issues raised by employees seriously and addresses each issue in a fair and prompt way. CenterPoint Energy does not tolerate any form of retaliation or negative reaction for raising good faith concerns about violations of our Code or any applicable laws or regulations.

Examples of ethics concerns:

- Conflicts of interest;
- Insider trading;
- Harassment;
- Discrimination;
- Theft; and
- Other behavior or business practices inconsistent with our Code.

Examples of issues typically for HR:

- Concerns about work schedule;
- Concerns involving profanity or general rudeness;
- Questions about benefits; or
- Questions about rehire eligibility.

To learn more about ethics concerns, visit our [Employee Concerns Policy](#).



Concerns can be reported anonymously with the helpline, toll-free, via [web intake](#), or [mobile intake](#) 24/7, 365 days a year.

Safety: We Provide a Safe & Healthy Work Environment

Workplace Safety & Health

CenterPoint Energy is committed to protecting the safety and health of employees by providing a safe and secure workplace where no person is subject to an unnecessary risk. As employees, we must stay aware of the possible safety risks we may encounter while doing our jobs. We protect ourselves and others from possible health and safety risks by promptly reporting safety hazards, near misses, accidents, and incidents – no matter how small – and engaging in activities to mitigate the risks. These reports help CenterPoint Energy investigate potentially unsafe practices and situations and make changes to protect our employees and community.

Supplier Safety

Through our **Supplier Code**, we expect our suppliers to embody CenterPoint Energy's core values by promoting and maintaining a safe environment free from discrimination, complying with all applicable labor, employment, and human rights laws, and upholding a zero-tolerance policy for workplace violence.

Violence in the Workplace

CenterPoint Energy will not tolerate any acts or threats of violence, intimidation, bullying, assault, or aggressive behavior in the workplace committed by or against our employees. If you witness or experience any threatening behavior, including written words, report it.

We do not allow employees to keep weapons on Company property, including personal vehicles parked on the property, unless state laws allow otherwise.

Substance Abuse

Performing our jobs safely and productively requires clear thinking and unclouded judgment. Drugs, alcohol, and other substances can prevent us from doing our best work and threaten our goal of a safe and healthy work environment. CenterPoint Energy expects everyone to report to work free from the possession of illegal drugs and the effects of drugs, alcohol, or other substances with the potential to affect job performance. Our workplaces have specific procedures in place to support compliance with the law, our rules, and collective bargaining agreements.

We reserve the right to search personal and Company property, enforce our rules, and test employees for substance abuse.



Integrity:

We Act with Integrity & Lead by Example

Conflicts of Interest

CenterPoint Energy wants every employee to succeed both inside and outside of the Company. The Company respects the rights of our employees to pursue opportunities outside of CenterPoint Energy, provided those opportunities do not harm CenterPoint Energy's business, our customers, or otherwise interfere with your job.

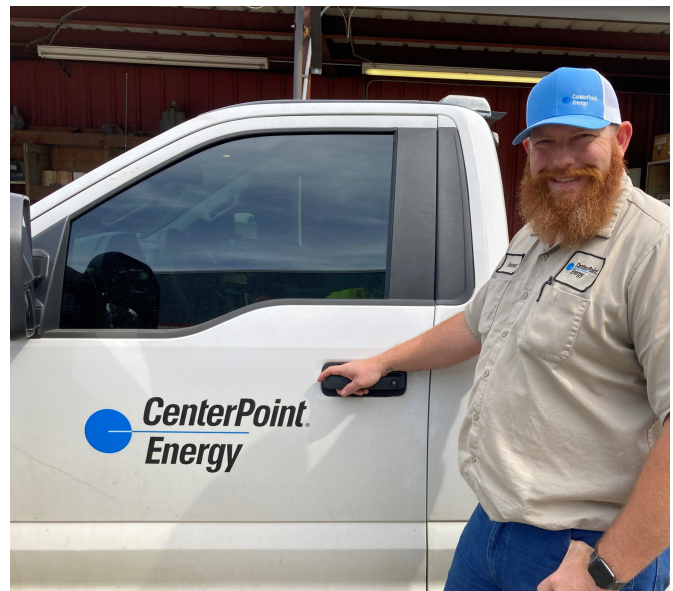
Employees must avoid even the appearance of a conflict of interest. A conflict of interest may exist when there is a conflict between a personal interest and the interest of CenterPoint Energy or a customer. If you use your position at CenterPoint Energy for personal gain, you may have a conflict. If you conduct an activity outside of CenterPoint Energy that may even appear to conflict with CenterPoint Energy or our customers, talk it through with the Ethics and Compliance department. Some examples of potential conflicts include:

- Supervising a close family member;
- Owning or investing in a company that may work or compete with CenterPoint Energy;
- Receiving personal compensation from a supplier;
- Using confidential information for personal gain; or
- Accepting or offering gifts, hospitality, or favors to or from a third party who does business (or wishes to do business) with CenterPoint Energy.

The Ethics and Compliance department can help you resolve potential conflicts of interest if you tell us about them. Employees may obtain prior written approval from the Company to avoid certain conflicts of interest. You should not make employment decisions of any kind about your family members. If you think you have a conflict of interest, talk to the Ethics and Compliance department, and we will solve the problem together. If we do not address actual or potential conflicts, not only does it violate our Code, but it also threatens CenterPoint Energy's commitment to integrity.

Key Questions to Identify Conflicts of Interest:

- *Am I using a Company resource for my own benefit?*
- *Do I have a relationship that may appear to impact decisions I make for CenterPoint Energy?*
- *Do I have an ownership stake in a business working with or competing with the Company?*
- *Would someone question my judgment based on something I'm doing outside of work or a relationship I have?*



Integrity: We Act with Integrity & Lead by Example *(continued)*

Antitrust, Competition & Fair Trade

We deal fairly with our customers, suppliers, competitors, and employees. They trust us because we keep our word and follow through with our promises. We do not engage in practices to unfairly limit trade or leave out competitors or agree with other competitors on prices or markets. We follow all applicable antitrust and competition laws and do not enter into agreements that would prevent or discourage competition.

Each of us should avoid discussing our business plans outside of CenterPoint Energy, even informally. We must protect proprietary, private to an end use customer, and market sensitive information, or any information that could give someone an unfair competitive advantage. We may not show a preference for any competitive market entity, such as recommending a specific provider to an end-use customer.



Integrity:

We Act with Integrity & Lead by Example *(continued)*

Gifts & Entertainment

At CenterPoint Energy, we compete fairly based on the quality our products and services. We do not offer, give, or accept gifts or entertainment where such exchange could potentially create a conflict of interest. From time to time, we may give or accept gifts or entertainment as a regular part of business where it is of reasonable value for a legitimate business purpose.

Before offering, promising, giving, or accepting a gift or entertainment, you should obtain approval from your supervisor and ensure it is accurately recorded with the Company. Travel or entertainment with a vendor requires the approval of the employee's vice president and the Ethics and Compliance department. As a general rule, employees should not offer a gift, entertainment, meal, travel, or anything of value to a government official. An employee should never accept cash, gift cards, other cash equivalents, or any gift appearing to be an attempt to sway your judgment.

THE G.I.F.T. RULE

When giving or accepting gifts at CenterPoint Energy, you must consider the following:

GOVERNMENT OFFICIAL

Know the relevant limitations or seek advance approval from Ethics and Compliance. Always err on the side of caution.



INTENT

Consider the intent of the gift or offer. Could a stranger think there is "corrupt intent?" If it became public, how would it look?



FREQUENCY AND TIMING

Think about when and how often gifts are exchanged. Are the gifts just occasional in nature and at appropriate times, such as the holidays? Do the gifts tend to come exactly when you are deciding on the award of a contract?



TOO MUCH?

How grand is the gift or entertainment? Is the gift considered nominal? Is the offer within the other party's limits? Remember that cash, gift cards and cash equivalents from outside parties are always against CNP policy.



Integrity:

We Act with Integrity & Lead by Example *(continued)*

Third-Party Business Relationships

We expect our suppliers, vendors, subcontractors, and business partners to follow ethical business practices and maintain the standards set forth in the Supplier Code. We choose our vendors carefully based on objective criteria such as price, past performance, safety record, business reputation, technical expertise, production capacity, and financial stability. If you think you have encountered a conflict of interest with a third party, please report it to the Ethics and Compliance department.

Questionable Payments

CenterPoint Energy never offers, promises, gives, or accepts money or anything of value to or from third parties to get an improper business advantage. As employees, we do not offer any payments or concessions during a commercial transaction without proper authorization, even through a third party. CenterPoint Energy prohibits all kickbacks, bribes, and payoffs. It is just as wrong to offer a kickback as it is to accept a bribe.

Fraud/Anti-Money Laundering

Fraud compromises the accuracy of our financial records and threatens our reputation. Fraud involves intentionally misrepresenting or concealing facts in a way that could lead someone to rely upon false information and can range from minor employee theft to significant misstatements of the Company's books. CenterPoint Energy remains alert to suspicious transactions that could represent money laundering. We must understand what qualifies as fraud and report all suspicious financial activities.

Some common types of fraud include:

- *Inaccurately reporting time, sales, or expenses;*
- *Falsifying any business report;*
- *Understating/overstating liabilities and assets; and*
- *Intentionally, misleading customers about contract terms and conditions.*

Accountability: We Protect Company Assets & Preserve Resources

Company Property

The proper management of Company property and assets allows us to effectively serve our customers. Employees are responsible for respecting and protecting the Company assets used to do their jobs. Employees may only use Company property with authorization and should take steps to secure and protect it from damage, misuse, and theft. Under limited circumstances, employees may use CenterPoint Energy property for personal purposes with management approval, as long as such use does not reduce property value, interfere with an employee's work, or result in personal profit. Employees have no expectation of privacy and CenterPoint Energy may monitor all information contained on our property or in our systems, regardless of location.

Technology & Cybersecurity

Just like we must care for CenterPoint Energy's physical property, each of us should protect the technology we use to do our job. We should use these resources responsibly. Each of us has a responsibility to follow applicable information security policies (such as password requirements, "phishing" precautions), software licensing agreements, and document retention policies. If you see theft, misappropriation, or other waste of Company resources or property, speak up.



CYBERSECURITY
A W A R E N E S S

Tips from CenterPoint Energy Technology

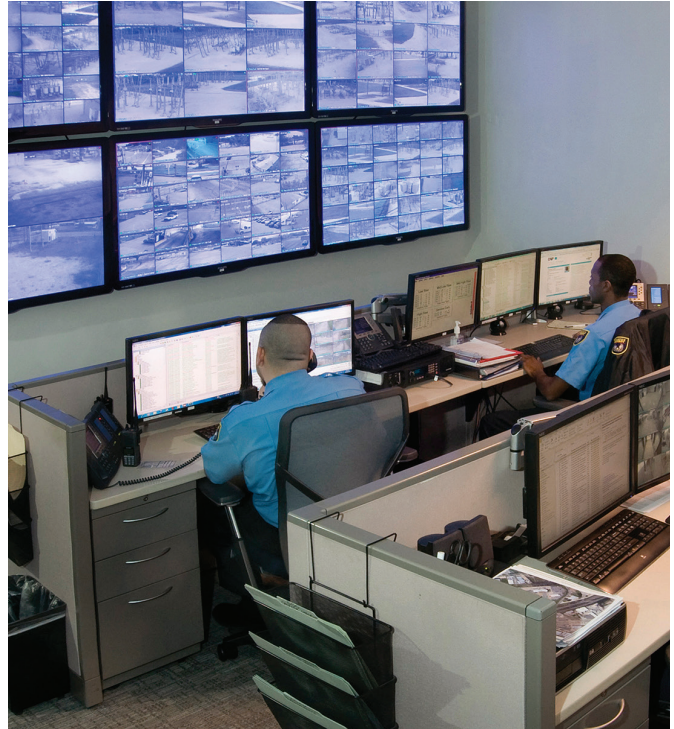
- *Only use Company-approved applications to send confidential information outside the Company.*
- *Save confidential information using Company-approved tools, not personal laptops or portable devices.*
- *Never share non-public information on the internet or social media.*
- *Lock up unattended devices. Lock your computer screen when you leave your desk.*
- *Don't leave confidential information on printers or whiteboards.*
- *Avoid leaving work devices in vehicles.*
- *Avoid viruses and malware; don't click on suspicious attachments or links.*
- *Never share your Company password with anyone.*
- *Don't use your Company password for external accounts.*
- *Always be aware of what's on your screen while on airplanes, trains, or in other public locations where someone might be able to see your screen.*

Accountability: We Protect Company Assets & Preserve Resources *(continued)*

Insider Information

Some of the information we communicate internally is not public and could be considered material to someone who is thinking about buying or selling securities (for example, stock). Information is considered “material” if there is a substantial likelihood, a reasonable investor would consider it important when making a decision with respect to securities. Federal securities laws prohibit employees from engaging in certain transactions involving securities when they are aware of material nonpublic information as well as providing material nonpublic information to others who may trade securities on that basis.

Do not share material, non-public information with anyone outside of the Company, including family and friends. Even sharing this information with another employee may be considered “insider trading” if the other employee uses the information to purchase or sell securities. Within CenterPoint Energy, only share information with colleagues or certain third-party agents (such as investment bankers or outside legal counsel) when they need to know something to do their work for the Company, until the information has been publicly released by the Company.



Confidential Information & Intellectual Property

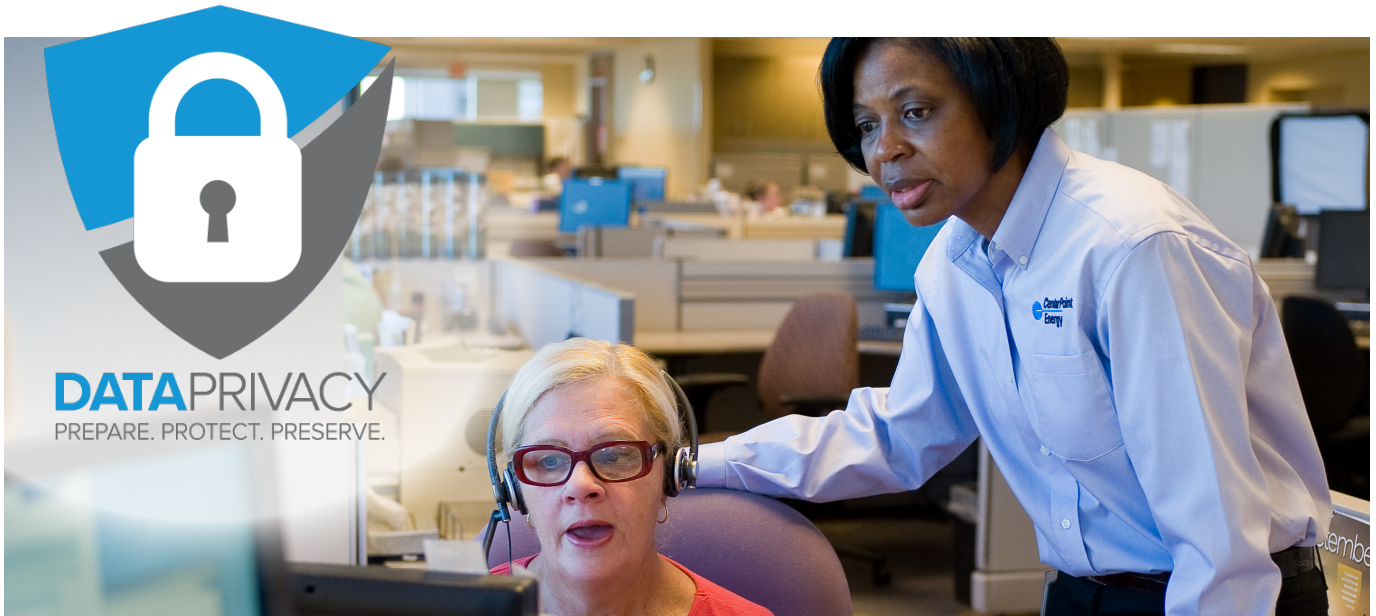
CenterPoint Energy’s sensitive and confidential information are important company assets. Our intellectual property, including trademarks, trade secrets, and technical business knowledge and expertise represents hard work by our employees, and in some cases, our competitive advantage. You should assume this type of information is confidential, unless CenterPoint Energy publicly discloses it. Some information may require more protection than others. If you have a question about whether you can disclose certain information, contact Legal. Your duty to protect CenterPoint Energy’s sensitive and confidential information continues even after you no longer work for CenterPoint Energy.

If you need to share sensitive or confidential information with a third party as part of your job, make sure the person receiving the information has signed a non-disclosure agreement or is otherwise required to keep the information confidential consistent with our policies and legal requirements. Don’t talk about sensitive or material, non-public information in public places where somebody may overhear your conversation.

Examples of sensitive or confidential information include:

- *Critical energy infrastructure information;*
- *Customer information;*
- *Financial information;*
- *Business strategies and plans;*
- *Organizational charts; and*
- *Intellectual property (for example, market research data, technical drawings/plans, software development processes); and*
- *Material non-public information.*

Accountability: We Protect Company Assets & Preserve Resources *(continued)*



Privacy

We respect the privacy of our customers, business partners, and suppliers and protect their personal information. We also protect our employee's personal information. We expect all employees to keep all of CenterPoint Energy's personal, proprietary, and private information in confidence. Personal information includes customer information, an employee's personnel file, medical information, social security number, home address, and telephone number. Employees may only access personal information when they need to know such information to do their job and have obtained proper authorization.

Business Records & Internal Controls

Accountability also means we are straightforward and truthful in conducting our business. CenterPoint Energy must maintain transparent financial records and report accurate information to our shareholders. Accurate recordkeeping is important in every transaction. We all have a responsibility to be thoughtful in our company expenses and to keep our records clear, accurate, and complete. No one should ever falsify any record or account. We should be candid and transparent in conducting Company business.

We are also committed to identifying and preserving records of vital historical, fiscal, and legal value – and to disposing non-essential records in a timely manner, in accordance with CenterPoint Energy's **record retention** requirements.

Tips for Internal & External Audits

- *Cooperate fully.*
- *Provide complete, accurate, and timely responses to questions and document requests.*
- *If asked to retain records by Legal, Ethics and Compliance or Regulatory and Government Affairs, do so until you are told retention is no longer necessary.*
- *If someone outside CenterPoint Energy asks for records, contact Legal about how to respond.*

Initiative:

We Honor our Community and Make a Difference

Our Communities

We recognize the role we play in the communities where we live and work, and we take our corporate responsibilities seriously. When our communities need us, CenterPoint Energy is there. The CenterPoint Energy Foundation supports nonprofit organizations whose programs and services align with our core giving pillars: community vitality, education, and local initiatives. We work to make a positive difference in our communities through giving and volunteerism.

In addition to our Company-organized volunteer efforts and our donation matching program, Easy Match, we also encourage our employees to find additional ways to make a difference individually in their local communities. Employees should feel free to support charitable activities in their personal capacities but may not speak on CenterPoint Energy's behalf in any forum (online or otherwise).



Our Customers

We must work every day to earn and keep the trust of our customers by dealing fairly, protecting customer information, and consistently providing safe and reliable energy. While our customers' trust takes time to earn, it can be lost in an instant.



Our Suppliers

At CenterPoint Energy, we are committed to developing strong working relationships with suppliers by actively seeking qualified diverse suppliers, encouraging suppliers of CenterPoint Energy to support supplier diversity, and seeking opportunities to develop diversity.



Protecting the Environment

We have a long history of working in a safe, reliable, and environmentally responsible manner. CenterPoint Energy protects the environment by promoting conservation, waste management, and carbon emission reduction initiatives. We are responsible for properly handling, storing, and disposing of waste products, hazardous materials, and regulated substances. If you have questions about an environmental matter or think a hazardous or regulated substance has been inappropriately released, contact Environmental Services.



CenterPoint Energy is reducing emissions with Picarro leak detection.

Initiative:

We Honor our Community and Make a Difference *(continued)*

State & Federal Regulatory Authorities

CenterPoint Energy supplies energy to both wholesale and retail customers. We take care to ensure the safety and reliability of our nation's energy supply. Our operations are highly regulated by both state and federal regulatory commissions. Failure to comply can result in substantial penalties.

Political Activities

CenterPoint Energy maintains state and federal political action committees ("PACs"). PAC contributions are designed to help achieve our Company's goals and support issues important to our industry, not based on party affiliation. Employees may choose to contribute to our PACs.

Only authorized persons may communicate with government officials on CenterPoint Energy's behalf. Employees should direct any questions or inquiries from a government official to Regulatory Services and Government Affairs.

We encourage employees to participate actively in politics in their personal capacity. If you choose to participate, your contributions must be on a personal basis, using your own funds. Company resources may not be used to express personal political views. While expressing a personal political view, you may not reference your title or job with CenterPoint Energy.



Respect:

We Value Everyone & Promote Diversity and Inclusion

Fair Treatment & Equal Opportunity

Each of us plays a critical role in creating a workplace where we can all participate and contribute. We promote diversity and inclusion and strive to maintain a culture where all employees are free from discrimination. CenterPoint Energy prohibits discrimination based on race, color, ancestry, age, gender, sexual orientation, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy, or any other status protected by law or local policy. This type of conduct hurts our fellow employees, our customers, and impacts the success of our business. Our Company does not tolerate bullying or conduct which diminishes anyone in any way. If you see this type of conduct, speak up and report it.



Workplace Respect

We have zero tolerance for harassment, discrimination, or other abusive behavior. We are each responsible for building and maintaining a safe, respectful, and professional work environment. Our customers and fellow employees expect nothing less. We treat all employees, customers, vendors, and suppliers with respect, courtesy, and dignity. We respect our employees by following all labor, employment, and human rights laws applicable to our business. If you witness a situation that feels unsafe or may violate one of these laws, report it.

We all play a role in preventing workplace bullying and harassment through awareness of what is going on around us. Harassment is unwelcome, disturbing or offensive conduct that creates an intimidating, hostile, or offensive work environment which may result in physical or psychological harm. Sometimes harassment or unwelcome behavior may not be obvious, so it is important recognize the key signs of this behavior. If you witness or experience harassment, speak up and report it.

Key Concepts to Identify Harassment

- *The victim may be a man or a woman and may be of the same gender as the harasser;*
- *The harasser may be the victim's manager or supervisor, a co-worker, or a non-employee such as a vendor;*
- *It may be a physical act or in written, electronic or verbal form; and*
- *Anyone may be impacted by offensive conduct (not just the person harassed).*

Respect:

We Value Everyone & Promote Diversity and Inclusion

(continued)

Social Media

Employees may occasionally access social media on work devices for personal use, but make smart decisions. Do not post anything on social media that may be offensive to our customers, employees, business partners, or other stakeholders. You are responsible for all content you publish on social media, whether personal or for your job. Do not discuss any non-public or sensitive information on social media or anything that could reflect negatively on our Company, our suppliers, or customers. If you share your views about our business, make sure to mention you work for CenterPoint Energy, your views are your own, and to not share anything false or misleading. If you see something false or negative about CenterPoint Energy online, don't respond. Instead, let the Vice President, Communications and Community Relations know.



Contact with the Media

When CenterPoint Energy speaks, it can make news nationally, so our goal is to communicate accurately, consistently, and according to our values and securities law to protect our business. Each of us has a responsibility to stay customer focused and responsive to inquiries. Corporate Communications handles all questions or requests related to the Company at Media.Relations@centerpointenergy.com.



Our Future

We all play a role in achieving our vision. Our Code provides a framework for how we work, but it is not enough to just read the Code. We must learn from our century-and-a-half history, live our core values of Safety, Integrity, Accountability, Initiative, and Respect, and strive for continuous innovation and improvement.





Key Messages

When all is said and done, here are the most important ideas to remember:

- We are always **committed to safety**.
- We **respect the dignity** of everyone.
- We **listen** openly to concerns and suggestions.
- We carefully **follow the laws, policies, rules and regulations** governing our business.
- We will **not compromise our integrity** to meet financial plans or reach goals.
- We do **not have to make tough decisions** alone.
- We take **initiative** and speak up.
- We are the **keepers of our ethical culture**.

CenterPoint Energy ETHICS AND COMPLIANCE CODE

Concerns Helpline



PHONE
1-888-888-3155



ONLINE
centerpointenergy.com/ethics

