



Many Strengths, One Code

Code of Ethics and Business Conduct



Our Core Values

Safety, Ethics, Excellence, and One Dominion Energy

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A Message From Tom Farrell

Ethics is a core value at Dominion Energy. That means qualities such as integrity, individual responsibility and accountability matter every bit as much as bottom-line results. Doing right and doing well are inseparable.

Every company needs a compass to navigate through these complex, fast-paced times in which the potential for ethical abuse is ever present. The consequences of unethical behavior — or even perceived unethical behavior — inevitably show up sooner or later: an employee gets injured, earnings and share price plummet, or the company's credibility suffers.

Dominion Energy's Code of Ethics and Business Conduct serves as our moral compass. The Code helps define and guide our decisions and actions. It articulates the policies and practices that govern ethical conduct and compliance issues. It includes one set of rules that apply to you and me and everyone alike.

These rules must be read and understood by every Dominion Energy employee, regardless of job title or work location.

The Code exists to promote lawful conduct and provide you with answers to questions that have an ethical or legal dimension. It covers a broad range of issues, including such things as workplace safety, conflicts of interest, use of company assets and protection of employee information.

Use our Code when faced with an ethical choice or concern. It is a valuable resource for meeting our high standards of conduct and our obligations to shareholders, customers, business partners, the community and each other.



Tom Farrell

Chairman, President and Chief Executive Officer



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**Ethics and
Compliance**

**Our Shared
Responsibility**

About this Code

This Code is intended to promote lawful and ethical behavior by all Dominion Energy employees and members of the board of directors. Its purpose is to ensure that the company and those acting on its behalf conduct business according to our core values and all applicable company policies and legal requirements.

Dominion Energy's reputation is a priceless asset. To preserve and protect this reputation, members of the company's board of directors, all Dominion Energy employees (both union and non-union) and Dominion Energy's agents are expected to conduct company business in accordance with the highest level of ethical standards.

Our Code provides an introduction to important policies and legal requirements that we must follow. You should use it for guidance to help understand the company's ethical standards and expectations. However, the Code is only a starting point. It is not intended to describe every policy, regulation, or law that may apply to you. Many of the company's written policies go into more detail on various topics. You will find references to applicable policies throughout the Code. These policies are available to all employees and members of the board of directors on DomNet. Additional policies or legal requirements may apply to you depending on your work location.

Our Responsibilities for Ethical Behavior and Compliance

Each of us has a responsibility to comply with the spirit and the letter of the laws, regulations, and company policies that apply to our work.

We are expected to behave with respect, honesty and decency towards everyone with whom our business interacts. A legal or regulatory violation could subject the company to liability and in some cases also subject employees or board members to personal liability. Even an allegation of a violation could seriously damage Dominion Energy's reputation.

Those who supervise others have the additional responsibility of setting an example with their own ethical conduct. Leadership is expected to keep lines of communication open so that employees feel comfortable asking questions and reporting concerns. Leadership is also expected to ensure that employees under their supervision complete assigned training and have adequate knowledge to follow the requirements and expectations established by this Code.

Each of us must be committed to full compliance with the letter and the spirit of the laws and regulations that are applicable to our business. Additionally, Dominion Energy has established policies, practices, guidance, and training to inform employees of the requirements and guide our decisions and actions. We always expect full compliance, and our policies practices, and guidance provide direction to meet or exceed the legal and regulatory requirements.

Answers to ethical questions are not always clear. When faced with a difficult decision that may raise an ethical or compliance issue, it might help to ask yourself the following questions:

Is the action legal?
If an action is illegal, do not do it.

Is the action in compliance with company policy?
If an action is against company policy, do not do it.

How will I feel if I do it?

Will I be able to function with a clear conscience?

If an action or decision is inconsistent with the company's values, do not do it.

Ask Questions

It is our responsibility to ask questions and immediately bring potential concerns to the company's attention.

Seek Advice

If you are unsure about the proper course of action, seek guidance from management, a Compliance Officer or the Ethics and Compliance Program.

Your supervisor is often the best person to go to for advice. He or she is most familiar with you, other members of your department, and the work that you do. In some situations, however, there may be other resources better suited to address your concerns or to provide guidance. For example, your supervisor might be the subject of the concern. In that case, there are numerous resources available to you, including the Dominion Energy Compliance Line, Human Resources representatives, Dominion Energy Compliance Attorneys, Officers, and the Ethics and Compliance Program.

Report Concerns

You have a duty to report any concern that is perceived as unethical or in violation of company policies or legal requirements. If you are aware of suspected misconduct, illegal activities, fraud, misuse of company assets, or violations of company policies, it is your responsibility to report the concern immediately.

Many issues can be addressed person to person by speaking with your supervisor, your supervisor's boss, a Human Resources representative, or the Ethics and Compliance Program. If you are not sure where to go, or prefer to report a concern anonymously, you should call the Dominion Energy Compliance Line or report the concern electronically through the Dominion Energy Compliance Line Online. Dominion Energy has contracted with an independent company for Compliance Line services. This company does not record telephone calls, track caller ID, trace electronic communications, or otherwise attempt to determine your identity.

To report a concern call 1-800-628-1798

You may call the Dominion Energy Compliance Line 24 hours a day, seven days a week. All calls are handled by personnel trained to respond to compliance-related calls. The person who answers your call will take detailed notes of your conversation, and then will read the notes back to you to ensure that the information you provided has been accurately documented.

Or go online www.DConcern.com

If you report a concern electronically through the Dominion Energy Compliance Line Online, you will be directed through a series of screens where you will be asked to provide information about your concern.

The Ethics and Compliance Program will receive a report with the details of your concern within 24 hours of your call or website report. In situations where time is of the essence and immediate attention is required, please contact the Dominion Energy Compliance Line at 1-800-628-1798. Reports that describe an emergency situation (imminent threats to life, health, property or the environment) will be reported immediately to the appropriate Dominion Energy official.

Q. I reported my concern anonymously, so why was I interviewed?

A. The person investigating your report is responsible for gathering facts pertaining to the reported concern. To do this, the investigator identifies individuals who may have knowledge of the concern and contacts them. If the investigator believes you might know relevant facts, you could be interviewed. However, that does not mean the investigator is aware that you are the anonymous caller.



After you describe your concern or question, you will be issued a report identification number. You can use this number to call back or to access the website at a later date to check the status of your concern or to obtain the answer to your question. If you report a concern anonymously, you will also receive a personal identification number (PIN) which is required when accessing your report.

Investigations and Consequences of Code Violations

When you report a concern, the information is thoroughly reviewed. If the concern is identified as an ethics or compliance matter, the Ethics and Compliance Program will investigate it. Sometimes employees use the Dominion Energy Compliance Line to report concerns that are not related to ethical or compliance issues. The Ethics and Compliance Program will refer such concerns to the appropriate department to resolve.

Often, the investigation of a concern will indicate that additional training is the appropriate course of action. If the investigation of an ethics or compliance matter reveals that a violation of this Code has occurred, appropriate disciplinary action will be taken, up to and including termination of employment. Please refer to the company's *Discipline Policy* for more information. Depending on the nature of the violation, other consequences may include reimbursement to the company for any losses or damages resulting from the violation or referral for criminal prosecution.

Good-Faith Reporting

Employees who report suspected misconduct or a compliance concern are expected to be truthful in their reporting. Making a false allegation knowingly is considered bad-faith reporting and is a violation of this Code. Dominion Energy will discipline any employee who makes a false accusation knowingly or provides false information to the company or others. Such discipline may include termination of employment.

Protection from Retaliation

Dominion Energy values openness and respects the contributions of employees who help enforce this Code.

Dominion Energy does not tolerate retaliation against any employee who in good faith reports suspected unethical conduct or violation of laws, rules, regulations, or company policies or retaliation against individuals for cooperating with an investigation of a concern or otherwise supporting another individual's concern. If you believe that your honest reporting of a concern or your involvement in the investigation or consideration of a concern has subjected you to retaliatory action, contact the Dominion Energy Compliance Line, or a member of the Ethics and Compliance Program staff.

Q. I observed a co-worker showing sexually explicit pictures on his company computer. I am offended and want to report the concern, but I do not feel comfortable reporting it to my supervisor. What should I do?

A. You can call the Dominion Energy Compliance Line and speak directly to a trained specialist or you can report the concern through the Compliance Line Online website. If you choose, you may report the concern anonymously.

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Our Commitment to Fellow Employees



Diversity and Equal Employment Opportunity

We expect employees to create and reinforce an inclusive, creative and productive work environment in which everyone feels accepted and respected.

Fostering a diverse and inclusive workplace is everyone's responsibility. At Dominion Energy, "diversity" refers to who we are — the various characteristics that make us unique. It includes age, physical ability, education, religion, ethnic background, sexual orientation, socioeconomic status, as well as race and gender.

We are expected to treat each other fairly and with respect. You can help do this by following the company's *Guiding Principles and Behaviors for an Inclusive Workplace*.

Inclusive behaviors:

- **Encourage an understanding of self and others**
- **Make it safe to talk**
- **Foster clear two-way communications**
- **Provide coaching and feedback**
- **Connect individual jobs to Dominion Energy's mission**

Leadership is responsible and accountable for encouraging appropriate workplace behaviors and addressing inappropriate behaviors.

Under no circumstance should any employee, contractor or other agent or job applicant be treated less favorably because of race, color, ancestry, sex, gender, religion (including religious dress and grooming practices), national origin, age, actual or perceived physical or mental disability, medical condition, genetic information, sexual orientation, gender identity or expression, military or veteran status, marital status, status as a victim of domestic violence, or any other status protected by federal, state, and/or local laws. It is your responsibility to report any action that you think is discriminatory. For more information, please read the *Equal Employment Opportunity Policy*.

Q. I applied for a supervisory position. I was interviewed but did not get the job. Instead, the position was offered to someone who is much younger than I am. Is this a violation of the company's *Equal Employment Opportunity Policy*?

A. Not necessarily. The fact that the individual who was offered the position is younger than you are does not make the decision discriminatory. The company expects leadership to make good-faith decisions when hiring, placing and promoting employees. Although leadership is prohibited from making promotion decisions based on age or any other inappropriate factor, leadership could conclude in good faith that an employee who happens to be younger than you is best suited for the supervisory position. If you believe that a manager has discriminated against you or made a decision in bad faith, you should report your concern. Refer to Dominion Energy's *Hiring Policy*.

Freedom from Harassment

We are committed to a workplace free from any form of harassment.

Harassment undermines the integrity of the employment relationship and respect of human dignity. You have a responsibility to uphold the company's commitment and report any acts (verbal, physical, or visual) of harassment, intimidation or coercion based on or related to race, color, ancestry, sex, gender, pregnancy, religion (including religious dress and grooming practices), national origin, age, actual or perceived physical or mental disability, medical condition, genetic information, sexual orientation, gender identity or expression, military or veteran status, marital status, status as a victim of domestic violence, or any other classification protected by law.

Management is held to an even higher standard to ensure that the company is not creating an environment of distrust or unwillingness to report a concern. For more information, please read the *Harassment Policy*.

**Everyone Wins
When Safety
Comes First**

**REPORT SAFETY
CONCERNS
IMMEDIATELY —
ALWAYS**

Safety in the Workplace

Safety is a core value at Dominion Energy. Every employee shares the responsibility for ensuring that we work in a safety-conscious environment.

Our shared commitment to safety is simple. Everyone wins when safety comes first. Whether we work in an office, out of a bucket truck, at a power plant, along a gas pipeline, or any other place where Dominion Energy does business, safety is our top priority — in all that we do, every day.

We have a shared responsibility to resolve unsafe conditions and maintain a safe work environment for employees, contractors, agents, customers and the general public. We must be mindful of the importance of working in a safety-conscious environment and do our part to keep it that way. We must complete all safety training assigned to us as promptly as possible.

Each of us is responsible — without exception — for reporting any workplace condition that might be unsafe. If you become aware of any workplace injury, you must advise management immediately so that appropriate action can be taken, including documentation of OSHA recordable accidents.

In addition you are required to understand and follow the basic expectations and safe work practices described in the *Safety Policy* as well as the safety-related policies and procedures that apply to your particular work location.

Workplace Environment

One of the many ways the company ensures that we provide a safe and productive work environment is by requiring all employees to be fit for duty. When issues arise regarding your physical, emotional, or mental health, ask yourself if you are equipped to work safely. If you believe that you or one of your co-workers is not able to work safely, you should immediately contact your supervisor or report your concern to the Dominion Energy Compliance Line or electronically through the Dominion Energy Compliance Line Online. For additional information, please review the *Fitness for Duty Policy*.



As part of our commitment to safety, we will not tolerate any form of workplace violence. Violence includes any verbal or physical conduct occurring in the workplace or affecting the workplace that causes someone to fear for their personal safety, the safety of co-workers, or the safety of company property.

Firearms and other weapons are not allowed on company property without prior written authorization from the manager of Corporate Security.

If you have knowledge of any workplace violence issue that does not involve imminent danger, contact your supervisor, or report the issue through the Dominion Energy Compliance Line. For additional information, please refer to the *Violence in the Workplace Policy*.

If you know of actual or potential workplace violence, or if you believe someone is in danger, immediately contact Corporate Security at 800-684-8486, or call 911.

Protection of Employee Information

We have an ethical and legal responsibility to preserve the privacy, confidentiality and security of personal employee information.

During the course of our employment, Dominion Energy collects and uses confidential personal information about us as part of its administration of the employment relationship. Examples of confidential personal information include data related to compensation, benefit plan enrollment, disability and family medical leave, performance reviews, phone numbers, home addresses, social security numbers, and other personal information. At times, the company needs to disclose personal information to third parties, such as vendors that administer our retirement plans and other benefit programs. The company also may need to disclose personal information to comply with legal and regulatory requirements. Federal and state laws govern the disclosure of certain types of personal information.

We must be able to trust that anyone who has access to other employees' personnel records or other personal information in the course of performing their job duties will treat the information confidentially and use it only for appropriate business reasons and in compliance with applicable privacy laws. If you are in a job with the authority to access other employees' confidential personal information, you must have a legitimate business reason to access the information, and you must not provide this information to anyone inside or outside the company who does not have a business need to know it. In addition, you must be familiar with Dominion Energy's encryption procedures and other methods of securing personal information when transmitting such information electronically.

Q. I work in Human Resources on benefits administration. I just learned by processing some company paperwork that a friend in another department needs to take a medical leave of absence. My friend has not told me about her condition, but I want to call her to let her know I am concerned and to offer my help. Is it okay to call her?

A. No, it is not okay to call her to inquire about her condition. At the present time, the only reason you have information about your friend's medical condition is because of your job. You can only use this information to the extent necessary to perform your benefit plan administration duties. In fact, calling your friend may be a violation of applicable laws that protect personal health information and could subject you to disciplinary action and the company to legal liability and penalties. You need to wait to call until either your friend tells you about her medical condition or you hear about it in a manner unrelated to any job responsibilities at Dominion Energy.

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**Our Commitment
to Customers
and Business
Partners**



Conflicts of Interest

Conflicts of interest can undermine business judgment and threaten Dominion Energy's reputation in the business community. Even the perception of a conflict of interest can cause the intent of your actions to be questioned.

Employees and members of the board of directors must avoid activities that undermine their business judgment or that could result in improper personal benefits because of their position with the company. Potential conflicts of interest must always be disclosed to leadership, and, in some cases, to the Chief Compliance Officer or the board of directors.

Under Dominion Energy's *Conflicts of Interest Policy*, you must inform leadership before you:

- **Accept or offer things of significant value from or to any vendor, supplier, customer, or competitor of the company;**
- **Have any personal financial interest in any business transaction in which the company is involved; or**
- **Engage in any business arrangement or other transaction that conflicts with the interests of the company.**

Employees should make leadership aware of a potential conflict of interest. Officers or board members should notify the Chief Compliance Officer or the Chair of the Audit Committee, respectively.

The facts in each circumstance must be evaluated to determine if the activity is in keeping with our ethical standards. In reaching a determination, the guiding principle will be whether the activity is consistent with the spirit and intent of our Code. Whether an activity is an actual or perceived conflict of interest depends on several factors, such as value, frequency, business purpose, undue preference to a particular party, and whether the situation interferes or could appear to interfere with your independent judgment or objectivity in doing your job.

Recognizing Conflicts of Interest

In general, a conflict of interest occurs when a personal or family interest interferes with — or could be perceived to interfere with — our ability to make sound, objective business decisions on behalf of Dominion Energy. A conflict of interest or the appearance of a conflict of interest may arise even if you are not in a decision-making role for the company.

If you are not sure whether a conflict of interest may exist, you should ask your leadership. If leadership is unable to determine whether a conflict of interest exists, then you or your leadership should contact the Ethics and Compliance Program for guidance. The following sections provide guidance for some common situations.

Q. My team just completed work on a significant project with an outside vendor. The vendor has offered to give me and my co-workers tickets to a major league baseball game. None of the vendor's business associates will be going with us to the game so this will not be a business entertainment event. The value of each ticket is \$75. Can we accept this gift of tickets?

A. Yes. The tickets to the baseball game have a nominal value. If additional gifts are offered to any of you from this vendor, you should consult with management before accepting them.



Business Courtesies

The giving and receiving of gifts, entertainment, meals and other business courtesies can be important and appropriate ways of building and maintaining proper business relationships. In certain instances, however, such exchanges can create a conflict of interest or the appearance of a conflict of interest. We should decline any business courtesy that is intended to or may appear to be intended to influence our business decisions. Similarly, we must not offer any business courtesy if our intent or the appearance of our intent may be to influence the recipient's business decisions.

Gifts

As a general rule, we should not accept or give gifts, services, discounts, or other things of value from or to a vendor, customer, union official, government official or employee, or other third party doing business or seeking to do business with Dominion Energy. Gifts received from a third party must be returned to the donor.

There are limited exceptions to this general rule. Gifts with a nominal value that are related to the maintenance of ongoing legitimate business relationships are allowed. As a general guideline, a gift with a value of \$100 or less is considered to be nominal in value. Over the course of a calendar year, you should not accept gifts from a single source that, on a combined basis, exceed \$200 in value. Examples of appropriate gifts include gifts of promotional items, food or beverages during the holiday season, tickets to ordinary sports and entertainment events, and supplier discounts available to all employees.

Gifts in the form of cash or anything that can be converted to cash, such as cash gift cards, are never permitted.

Business Entertainment And Meals

Meals and tickets to sports, theater and other entertainment events that have more than a nominal value can be accepted provided there is a business relationship with the donor, the donor is present at the event or meal, and the cost of the entertainment is reasonable under the circumstances.

Travel And Overnight Accommodations

In most cases, you should not accept offers for travel and overnight accommodations from a vendor that is doing business or seeking to do business with the company. Dominion Energy's policy is to pay for travel and accommodation expenses associated with functions that involve travel or overnight stays whenever such functions have a business purpose.

There may be times when it is not practical or feasible for Dominion Energy to pay for overnight accommodations. For example, a vendor may own the accommodations being offered or there is otherwise no monetary cost to stay overnight. If a vendor doing business or seeking to do business with the company offers to pay for or otherwise provide your overnight accommodations, you may not accept the offer without prior approval from the General Compliance Officer for your business area. If you are a Dominion Energy officer, you must obtain approval from the Chief Compliance Officer. If you are an executive officer or a board member, in the unlikely event you are offered travel and overnight accommodations by a vendor, you should consult with either the Chief Executive Officer or the Chief Compliance Officer before accepting any such offers. Any vendor provided travel will be reported to the Audit Committee.

Usually Acceptable

Some gifts and business entertainment we receive or give are small enough that they do not require pre-approval, such as:

- **Tickets to ordinary sports, theater and other cultural events that have a value of \$100 or less**
- **Occasional meals with business associates**
- **Coffee mugs, pens, calendars and other promotional items**

Always Ask

Some gifts or forms of business entertainment may or may not be permissible. You should always ask your leadership before you accept or give:

- **A gift of more than nominal value**
- **Gifts from or to a single source during a calendar year that, on a combined basis, have a value of \$200 or more**
- **Tickets to special events, such as a World Series or Bowl Game**
- **Overnight accommodations**

Never Acceptable

Some gifts or forms of business entertainment are never permissible — there are absolutely no exceptions. We may not give or receive:

- **Cash, securities, or anything convertible into cash (such as gift certificates that are convertible to cash)**
- **Travel expenses**
- **Overnight accommodations (unless pre-approved)**
- **Anything that is tied to an agreement of any kind that calls for anything in return for the gift or entertainment**
- **Anything of value for the purpose of improperly obtaining contracts or rewarding favorable treatment under contracts**
- **Any entertainment that is sexually oriented, unsavory, or otherwise violates our ethical standards**
- **Any gift or form of entertainment that could be illegal**

Q. A vendor seeking to do business with my business area at Dominion Energy has invited me to a golf outing at a local country club. The vendor has offered to pay my greens and cart fees totaling about \$200. Can I accept this offer?

A. Yes, this type of business entertainment is acceptable provided one or more business associates who work for this vendor will attend the golf outing.

Q. I am considering a temporary second job to earn extra money during the holiday season. Is this okay?

A. Yes, but remember that your first and primary responsibility is to Dominion Energy. You must be able to fulfill all of your job responsibilities, including overtime, if that is a requirement. Also, if your second job is with a business entity that is doing business or seeking to do business with the company, you must inform your leadership to be sure there is no conflict of interest.

Government Employees

Various laws, rules and reporting requirements may apply when we interact with government officials and employees. Violations of these requirements can result in significant civil and criminal penalties. If you interact with government employees as part of your job, you are expected to know and follow requirements and restrictions that apply to the exchange of meals, entertainment and other business courtesies between the company and a government official or employee. You are never allowed to offer or give anything of value to a government employee in an effort to obtain a contract or favorable treatment under a contract.

Corporate Opportunities And Fair Dealing

Employees and members of the board of directors have a duty to advance the legitimate interests of the company and to deal fairly with our customers, vendors, suppliers, competitors and each other.

You should not accept business opportunities, commissions, or advantageous financial arrangements from a customer, vendor or business partner. You also must not purchase for personal use goods or services provided by a company vendor on terms other than those available to the general public or established by company policy.

You may never take personal advantage of any business or investment opportunity that you may learn about through your work for Dominion Energy and that the company may want to pursue — unless and until the company has had an opportunity to evaluate it and has chosen not to pursue it. You must not compete with the company.

You may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

Loans And Guarantees

The company will not make any guarantees or loans to executive officers, board members, or their family members.

Employment And Compensation From Outside Sources

You may engage in outside business activities as long as they do not interfere with your duties and responsibilities at Dominion Energy. If you are planning to work for a business entity that is doing business or seeking to do business with the company, you must discuss the job with your leadership first. There could be a conflict of interest or the appearance of a conflict of interest.

If you or an immediate family member owns a significant financial interest in any business entity that does business or is seeking to do business with Dominion Energy, or is in competition with Dominion Energy, you must notify your leadership so the situation can be evaluated to determine if there is a conflict of interest. If you are a board member, you should notify the Corporate Secretary's Department.

Employment Of Relatives

To avoid the appearance of favoritism, you may not work directly for, work in the same chain of command as, supervise or make employment decisions about a family member. For additional information, please see the *Hiring & Assignment of Relatives Policy*.

Regulatory Requirements

Many aspects of Dominion Energy's business are subject to federal and state regulatory rules and laws. We are expected to know and comply with all regulatory requirements that apply to us.

The following sections discuss some of the common regulatory requirements that apply to the company's operations. There may be other specific regulatory requirements that apply to your business area. All employees, board members, contractors and other agents are required to understand and comply with the regulatory requirements that apply to them when conducting activities on behalf of the company. If you have a question regarding any legal requirements, you should contact an attorney in the Law Department who specializes in the applicable regulatory area.

Interaction Among Business Units And Affiliate Restrictions

The Federal Energy Regulatory Commission (FERC) and state utility commissions in several states where Dominion Energy conducts business have adopted codes and standards of conduct that govern transactions between the company's business units and affiliates. These codes and standards of conduct are intended to encourage well-functioning markets by preventing preferential treatment of company affiliates and to ensure that customers of our regulated businesses do not subsidize the company's non-regulated activities. To meet these objectives, the codes and standards of conduct require that affiliates function independently, restrict the sharing of certain categories of non-public information, and require that certain information be posted on Dominion Energy's website. It is your responsibility to be aware of and comply with the codes of conduct and standards of conduct that apply to your work.

Energy Marketing Compliance

Employees who engage in buying and selling of natural gas, electricity, or other energy commodities on behalf of the company and those who engage in documenting or reporting those transactions are expected to follow the laws, rules and policies that apply to those activities.

Be mindful of and follow the affiliate rules, energy marketing compliance rules, and any NERC Compliance requirements applicable to your job. You may be asked to complete training on how to comply with these complex regulatory rules. If so, you should complete the training promptly.

If you have questions about these rules or are uncertain about compliance requirements, seek guidance from the Law Department, the Regulatory Affairs department, or the Risk Management-Enterprise department. If you believe that any of these rules have been violated, report the suspected violation immediately.



Electric Reliability Standards — Nerc Compliance

Dominion Energy’s electric business must adhere to regulatory requirements that are designed to ensure the safe, reliable operation of the nation’s energy grid. The FERC has established mandatory reliability standards that apply to owners and operators of electric power assets. The North American Electric Reliability Corporation (NERC) has been certified as the Electric Reliability Organization with primary responsibility for overseeing compliance with these standards. The system of compliance includes Regional Reliability Organizations (RROs), which oversee compliance within eight geographical regions. The requirements include rigorous auditing and record-keeping, as well as internal compliance efforts both at the corporate level and within affected business units.

Q. My business unit is hosting a workshop at which representatives from several international energy regulatory agencies will speak. We would like to take the speakers to dinner and a football game to thank them for their participation. Is this okay?

A. Possibly. The answer depends on the specific facts and circumstances. Contact the Law Department to determine if this form of entertainment complies with the FCPA or other applicable laws.

International Business Conduct

Whenever we conduct our business, whether inside or outside of the U.S., we must have zero tolerance for bribery and must maintain accurate books and records.

The U.S. Foreign Corrupt Practices Act (FCPA) makes it a crime for companies and their directors, officers, employees and agents to offer, promise or pay anything of value — including gifts, payments or other improper inducements — to a foreign official, for the purpose of influencing them in the performance of their duties. “Foreign official” is broadly defined, and includes government officials, political parties and candidates for public office outside the United States, as well as employees of companies or entities owned or controlled by non-U.S. governments. In addition, the accounting provisions of the FCPA require that Dominion Energy maintain accurate books and records, and a robust system of internal controls. Violation of the FCPA could result in fines, penalties or imprisonment. Other laws and regulations inside and outside the United States similarly restrict improper payments made to non-government recipients.

Antitrust and Fair Competition

We must comply fully with the letter and spirit of laws designed to preserve free and open competition.

Our business activities are subject to state and federal antitrust laws. The purpose of these laws is to promote fair competition. The antitrust laws apply to a wide range of activities, including marketing, procurement, contracting, mergers and acquisitions, and the location and operation of our facilities. Antitrust laws are complex, and their requirements are not always obvious. Violations can lead to severe penalties and criminal sanctions. If you have any questions about how antitrust laws may apply to a particular situation, seek advice from the Law Department before taking any action.

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Our Commitment to the Company and its Shareholders

Accounting and Financial Reporting

We must report all financial transactions accurately, completely, fairly, and in a timely and understandable manner.

Responsibility in Reporting

The data we provide for the preparation of financial statements, regulatory reports and publicly filed documents must comply with generally accepted accounting principles and Dominion Energy's internal control procedures. Our shareholders rely on us to ensure that these statements reflect our company's operations and financial condition fairly and completely.

All steps leading to the creation of financial reports are important ones. These steps can include data entry, preparation of drafts, completion of records and reports. Any participation in the process, however small, must be truthful, accurate, legible and timely.

If you are involved in our disclosure process, you are required to be familiar with and to comply with the company's disclosure controls and procedures, as well as any internal controls over financial reporting that are relevant to your area of responsibility.

Dominion Energy employees perform activities on a daily basis that affect internal controls tied to our financial statements. Examples of such activities include:

- **Completing a timesheet accurately and on time**
- **Approving a timesheet**
- **Approving access to information systems**
- **Entering a goods receipt or service entry**
- **Approving payments for goods and services**
- **Reading a customer's meter accurately**
- **Ensuring proper accounting when obtaining a part from the warehouse**
- **Preparing and/or approving a journal entry**
- **Overseeing a budget each month**
- **Restricting access at your work location**

The actions or inactions of employees related to these tasks can affect internal controls, and therefore, compliance with the Sarbanes-Oxley Act of 2002 (SOX). Employees should be familiar with internal control policies and procedures relevant to their work areas and should follow these policies when performing their duties.

The following are examples of tasks or processes that could impact SOX compliance if they are not done correctly:

- **Paying invoices without prior approvals**
- **Approving invoices without checking terms and conditions of the purchase order**
- **Making purchases not in compliance with the *Expenditure Control Policy***
- **Improperly accessing financial systems**
- **Processing customer payments improperly**
- **Improper coding of project charges, expenses or budgets**



Insider Trading

You may not buy or sell Dominion Energy stock at any time when you are aware of “material” information about the company that is not available to the general public.

This information is referred to as “inside information.” If you have any questions about whether you might have inside information, you should contact the Corporate Secretary’s Department or the Chief Compliance Officer. Information is generally considered to be “material” if there is a reasonable likelihood that an investor would consider the information important when deciding whether to trade in a security or if the information could significantly affect the market price of the security if made public.

Examples of information likely to be material include: earnings, financial results or forecasts, unannounced dividends, possible mergers, acquisitions, divestitures, or joint ventures, and key personnel changes. Information is not considered to be public unless it has been circulated in a news release, public filing, or other public disclosure, and a sufficient amount of time has passed for it to be absorbed by the financial markets. Information usually is not considered public until after the close of business on the second trading day following the day of public disclosure.

The prohibition on insider trading applies to all transactions of company stock, including stock you may hold in the Savings Plan. To avoid any inadvertent insider trading, you may not enter into any hedging transactions related to Dominion Energy stock. Providing insider information to someone who may buy or sell Dominion Energy stock is also prohibited. The prohibition on insider trading applies not only to Dominion Energy stock but also to securities of other companies if you happen to learn of material, non-public information about another company in the course of performing your job for Dominion Energy.

If you are an executive officer or member of the board of directors, all transactions of Dominion Energy stock made by you or your immediate family members must be cleared in advance with Dominion Energy’s Corporate Secretary. Officers other than executive officers are expected to notify the Corporate Secretary’s Department before making transactions of Dominion Energy stock.

Insider trading is both unethical and illegal. Any employee who engages in insider trading is subject to disciplinary action, including termination. Please refer to Dominion Energy’s *Securities Trading Policy* for additional information and for specific reporting procedures.

Q. I overheard a co-worker sharing information about a potential divestiture over the phone with someone outside the company. What should I do?

A. Your co-worker may have shared confidential information inappropriately. You should report this information to your supervisor or to the Dominion Energy Compliance Line so an investigation can be conducted.

Records Management

Maintaining proper record-keeping is essential to meeting our obligations to customers, employees, investors, regulators and the general public.

Records are essential to running our business. *Dominion Energy's Records Management Program* incorporates legal and regulatory requirements into standard company practices, enumerates basic records management program guidelines, and sets forth responsibilities for records management. The program provides tools to assist employees with the management of all forms of recorded information.

Good records management includes adherence to retention schedules in effect for business records within your area of responsibility. You are expected to know and abide by the records management policies in effect for your business unit.

Legal Holds

A "Legal Hold" is a mandatory directive issued by the Law Department to preserve certain business records until the directive is lifted. A Legal Hold operates as an important exception to any retention schedule that otherwise might be in effect for a business record. Even though a retention schedule may call for destruction of a document or group of documents, a Legal Hold means that specified documents must be preserved until the Legal Hold is lifted and expires. You are expected to adhere strictly to the requirements of any Legal Hold directive.

Protection and Proper Use of Dominion Energy's Assets

All company assets are intended to be used by employees, contractors, other agents, and members of the board of directors only for legitimate business purposes.

Confidential Information

Confidential information is information about Dominion Energy that has not been disclosed to the general public and that might be useful to competitors or harmful to our vendors, or our customers if disclosure would be in violation of federal or state privacy laws. Confidential information includes company financial data, customer accounts, pending acquisitions or divestitures, trade secrets, contracts, strategic plans, regulated information or legal proceedings that has not been made public.

Proprietary and confidential information should not be used or disclosed outside Dominion Energy except in the performance of an employee's work, following all standards as described in the IT Security Handbook, Section 300-Information Protection. This applies to all electronic communications as well. If you have questions about the confidentiality of particular information, contact the Law Department for guidance.

Use of Company Resources

You have a responsibility to use company resources (i.e. property, facilities, and equipment) properly. This responsibility includes protecting company resources from loss, theft, abuse and unauthorized use. Company resources are available to help you achieve legitimate business goals. Careless, inefficient or illegal use of company resources can hurt all of us. Dominion Energy will discipline anyone who knowingly misuses company resources. Such discipline may include termination of employment.

Company computers and other electronic equipment and communication systems are intended to be used for company business purposes and must be in compliance with the *Electronic Systems Policy*. Limited, occasional personal use of company equipment or systems for personal reasons is permitted unless otherwise prohibited.

Keep in mind that electronic communications using company equipment are not private. Records of electronic communications may be made and used for a variety of reasons. The company has in the past, and will continue to periodically view, monitor, retrieve or copy any information or messages stored or sent on these electronic systems.

Social Media

Dominion Energy recognizes the value of social media as a communication and marketing tool for the business. If you choose to engage in social media conversations specific to Dominion Energy, do not make any official statements on behalf of Dominion Energy or give the impression that you are a company spokesperson. Use of social media during work should not interfere with your work duties or job performance. If you use social media for personal use, please remember that you are solely responsible for what you post online, that social media is inherently public, and your comments and content should not be considered private. For additional guidance, please refer to the *Social Media Policy*.

Media Relations

Dominion Energy's Media Relations maintains the company's relationship with the news media at all levels — national, trade, regional and local. All media inquiries must be referred to the Media Relations department.

If you are contacted or questioned by a reporter, you should immediately refer the reporter to the appropriate media contact, unless you have been authorized to do otherwise. You can also refer reporters to the Dominion Energy Media Line at (804) 771-6115.

Copyrights and Intellectual Property

Dominion Energy has specific legal rights and protections with respect to our intellectual property.

Dominion Energy owns numerous copyrights, trademarks, patents, and trade secrets, including company logos, publications and software that we have created or developed. These things are sometimes referred to as "intellectual property." Vendors and others outside the company may not use Dominion Energy's logo or other intellectual property without appropriate licensing arrangements. Ideas and inventions generated by employees during their employment generally belong to the company under the *Ideas and Inventions Policy*.

If your work requires you to use material that may be subject to copyright protection, please refer to the company's *Copyright Compliance Policy* for guidance.

NEVER:

- Use electronic systems to send messages that are in violation of any federal, state or local law
- Send language or material containing sexual content
- Visit internet sites that contain pornography or racially discriminatory material
- Download software to company electronic systems without prior consent from the Information Technology Department



Managing Business Expenses

Employee Travel Expenses

Dominion Energy pays for the reasonable costs of travel and related expenses when employees travel on company business.

Our *Travel and Expense Policies and Expenditure Control Policy*

provide guidance on what kind of expenses are allowed, as well as the proper procedure for documenting and obtaining reimbursement for those expenses. Dominion Energy must comply with all Internal Revenue Service requirements for documenting its business expenses. Therefore, it is important for employees to follow the strict requirements of these policies, obtain any necessary approvals for the expenses and submit proper documentation when preparing employee expense reports or reconciling Flex Card expenses.

Business Entertainment Expenses

When employees incur reasonable costs for business entertainment, those costs will be reimbursed by Dominion Energy. When considering whether to incur business entertainment expenses, it is important to review the requirements in our *Travel and Expense Policies, the Conflicts of Interest Policy, and the Business Courtesies* section of this Code. As with reimbursement for business-related travel expenses, there are strict documentation and approval processes in place for you to follow.

Company Credit Cards

Dominion Energy maintains an extensive process for procuring goods and services to obtain the most favorable terms for all transactions, as described in the *Supply Chain Management Policy*. All procurement activities must be carried out by individuals representing the interest of the company exclusively and in a manner consistent with the highest ethical, moral and legal standards. If you have procurement responsibilities and have reason to believe a conflict of interest may exist in relation to a specific procurement decision, you should report this without delay.

Special rules apply to the purchase of small dollar items for the company. When making these small dollar purchases, you will find important instructions in the *Flex Card Policy* and the *Expenditure Control Policy*. Following these policies helps the company maintain strong controls on its procurement of goods and services.

Flex Cards must never be used for personal purchases. A personal expense is any expense that is not considered business related by Internal Revenue Service guidelines. Internal Revenue Service regulations require documentation of the business purpose(s) for the expenses, including the names of all persons for whom the expenses were incurred.

Tax Treatment Of Employee Gifts and Awards

If you receive a gift or award from the company, you will usually be required to pay taxes on it. This applies to gift cards, gifts awarded in a raffle or for United Way participation, safety awards and certain retirement awards. There are limited exceptions for gifts that have a small dollar value, as determined under Internal Revenue Service guidelines. For additional information, please review the *Tax Treatment of Employee Gifts and Awards Policy*.

Q. My group wants to give our boss a gift for Bosses' Day. Is this considered a business expense? Can I use my Flex Card to buy this gift?

A. No. Gifts for events such as Bosses' Day, birthdays and weddings are personal expenses.

Q. Can I use a Flex Card to pay for flowers to send to a co-worker who has been hospitalized or who has had a death in the family?

A. Yes. You can use a Flex Card to pay for items that have an employee relations business purpose.

Q. Can I use my personal credit card for hotel expenses when traveling on company business?

A. Generally, no. You should use your Dominion Energy Flex Card to pay for business related travel expenses. Please refer to the Flex Card Policy for additional information.

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Our Commitment to the Community



Serving Nonprofit and Community Organizations

Dominion Energy supports civic projects and community programs that contribute to the betterment of society and we encourage employee participation in these activities.

At Dominion Energy, we strive to be responsible citizens, exemplary environmental stewards, ethical business people and friendly neighbors. Dominion Energy's legacy as a public service corporation instills pride in our employees and an awareness of our special responsibility to be a good corporate neighbor and to enrich community life.

You are encouraged to volunteer with nonprofit organizations and to participate in community activities, so long as your participation does not interfere with your job performance or create a conflict of interest with the company.

Environmental Compliance and Stewardship

Environmental protection is the responsibility of every Dominion Energy employee.

We are committed to full compliance with both the letter and the spirit of environmental laws and regulations. Additionally, Dominion Energy's policies and procedures may be stricter than what other companies do and Dominion Energy may also establish best practices that are more rigorous than what our regulators require of us. Failure to meet our environmental commitments could result in damage to the environment and to the company's reputation. It also could lead to criminal charges, fines and liabilities and imperil human health and safety.

If you become aware of a situation or practice that you suspect or know is harmful to the environment, or does not comply with the company's environmental policies or with governing laws, rules and regulations, you have a duty to report your concern to the company.

Environmental stewardship is embedded in Dominion Energy's culture and core values. It is our corporate commitment to conduct our business in an environmentally responsible manner.

Q. I am not sure, but I think I saw someone dumping chemical waste onto the ground at our plant. What should I do?

A. Chemical waste that is not properly disposed of could pose significant environmental and compliance concerns. Even if you are not sure, you must report the incident to your supervisor so that it can be investigated. If you prefer to remain anonymous, you should report the incident to the Dominion Energy Compliance Line.

Q. I was recently elected to a political office in my hometown and may need to vote on issues that involve Dominion Energy. Am I allowed to be involved in these discussions or to vote on these issues?

A. You must abstain from discussing and voting on any issue directly involving Dominion Energy and you must comply with the spirit and letter of any applicable conflict of interest laws and regulations.

Political Activities

We are committed to maintaining and enhancing strong and productive relationships with government officials through lawful participation in the political process.

Relationships With Government Officials

Doing the work of Dominion Energy often calls for officers and employees to interact with federal or state government officials, including representatives of the judicial, legislative or executive branches. In conducting the company's business, we must adhere to the highest standards of ethical behavior, as well as obey the letter of applicable laws, rules and policies. This means that we deal honestly and forthrightly with government officials at all times, and are mindful of ethical rules that address "revolving door" restrictions on hiring. If your work requires you to interact with government officials, be certain that you are familiar with these rules and follow the guidance contained in the *Conflicts of Interest, Business Courtesies, Regulatory Requirements and Political Activities* sections of this Code.

Dominion Energy's Political Activities

The laws and regulations governing transactions with governmental entities impose special rules and may have requirements not usually found in transactions with private parties. For example, a gift that may be acceptable if given to a private party may be illegal if given to a government official.

Federal law places limits on a corporation's ability to participate in the political process. Many states impose similar restrictions. These limits may include restrictions on monetary contributions and "in-kind" contributions, such as the use of facilities, tickets to receptions, payment for meals and lodging, and gifts to public officials.

The Dominion Energy PAC is a voluntary, nonpartisan political action committee. In accordance with federal legal requirements, the PAC is funded solely by personal contributions from Dominion Energy employees who are U.S. citizens or green card holders, who are paid on a salary (rather than hourly) basis, and who have policymaking, managerial, professional or supervisory responsibilities.

All employee contributions go directly to support political candidates who are working to protect and promote company and industry interests at all levels of the political process. Because it is issues-oriented, the Dominion Energy PAC is bipartisan and supports both Democrats and Republicans.



You must not offer, promise or give anything of value to any government official, government employee or agent — either directly or through a third party — without prior approval. You must have confirmation that the item of value complies with all laws and regulations that limit or prohibit such gifts, or that require such gifts to be reported.

If your job involves interactions with any governmental entity or with candidates for federal, state, or local elective office, you are expected to be aware of and to comply with the laws, regulations, and rules governing such interactions. If you are in doubt, do not attempt to interpret the rules yourself. If you have any questions regarding corporate contributions or lobbying, contact the Corporate Public Policy Department.

Personal Political Activities

Dominion Energy supports employee involvement in the political life of their communities and encourages individual activities that involve political parties, candidates or issues.

However, employees must make it clear that the views they express are their own and not those of Dominion Energy.

Federal and state laws restrict the use of company resources, such as computers, email, phones, stationery, copiers and other company assets in carrying out personal political activities. You must obtain the approval of your supervisor and comply with any applicable law before using company resources for political activities.

You may not solicit contributions from other employees for personal political purposes on company time, or ask other Dominion Energy employees to perform activities to support personal political activities. When making political contributions, you must use your own funds. Personal contributions will not be reimbursed by Dominion Energy.

You may hold public office as long as it does not interfere with the performance of your job or put you in a situation that could give rise to a conflict of interest. If you are a prospective candidate for public office, you must discuss your plans with your supervisor to address any potential conflicts. For additional information, please refer to the *Conflicts of Interest Policy*.

Q. My business area plans to host a reception at an upcoming musical festival. We plan to invite some state and local elected officials. Is that okay?

A. It might be okay, but you must not invite any elected officials to an event unless the Corporate Public Policy Department has determined that items of value — in this case the reception and tickets to the festival — comply with all laws and regulations that limit or prohibit such gifts, or that require the gifts to be reported.

Q. My co-worker asked me during work hours if I'd like to make a donation to his friend's campaign for mayor. Is this appropriate?

A. No. Employees may not solicit contributions for personal political purposes on company time.



Administration of this Code

Ethics and Compliance Program Overview

Dominion Energy's Ethics and Compliance Program applies to all levels of the company.

The Audit Committee of Dominion Energy's Board of Directors oversees the operation of the Ethics and Compliance Program. The Ethics and Compliance Program oversees the daily administration of this Code.

The Chairman, President and CEO appoints a high-level officer to serve as the company's Chief Compliance Officer.

The company's Chief Compliance Officer has established an Executive Compliance Council whose members are senior officers representing each business unit and is responsible for an enterprise-wide approach to managing critical ethics and compliance matters at Dominion Energy. Each member of the Compliance Council works to ensure that the program functions effectively. The Council provides direction to the Ethics and Compliance Program on training and awareness campaigns, and other ethics and compliance educational initiatives for employees across the enterprise.

The Chief Compliance Officer has appointed a director-level employee to manage the day- to-day administration of the Ethics and Compliance Program. This director-level employee works with designated Compliance Attorneys, Officers, members of the Ethics and Compliance Program staff, and other resources to handle concerns as they arise, depending on the business unit or area of the law or policy affected by the concern.

The Chief Compliance Officer and the director meet with the Audit Committee on a regular basis to review the operations of the program. Each of them has the authority to contact individual members of the Audit Committee at any time between meetings to report concerns or otherwise discuss ethics and compliance issues.

Please access the Ethics and Compliance Program website on DomNet to view the current list of appointed Compliance Attorneys and the appointed officers to the Compliance Council.

Waivers

All employees are expected to follow the standards set forth in this Code. In limited and appropriate circumstances, the Chief Compliance Officer may grant a waiver of a Code provision. To the extent required by law or stock exchange rules, the grant of any waiver of this Code for an executive officer or board member must be approved by the Audit Committee of the board and will be disclosed to shareholders promptly.

To report a concern call 1-800-628-1798

You may call the Dominion Energy Compliance Line 24 hours a day, seven days a week. All calls are handled by personnel trained to respond to compliance-related calls. The person who answers your call will take detailed notes of your conversation, and then will read the notes back to you to ensure that the information you provided has been accurately documented.

Or go online www.DConcern.com

If you report a concern electronically through the Dominion Energy Compliance Line Online, you will be directed through a series of screens where you will be asked to provide information about your concern.