

C O D E O F E T H I C S

integridad compromisos conducta
estado de derecho aprendizaje liderazgo
seguridad visión de futuro **criterio**
responsabilidad **hábitos** confianza
políticas **visión** desempeño apoyo
resultados **ética** **respeto**
sinceridad honestidad **valores**
principios socio responsable **excelencia**
cumplimiento **equipo** **colaborar**
diversidad pensamiento estratégico

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Message from the Chairman of the Board and Chief Executive Officer



Dear Colleagues

At IEnova, we always work based on the ethical values and standards that have guided our Company's success for more than twenty years. Today, as from our foundation, it is essential to live and instill these values in all our spheres of action.

Our ethical values must always be the guideline that sets out how we interact with clients, employees, competitors, authorities and the communities we serve. That is why IEnova's Code of Ethics was designed as a clear, useful and practical guide for our ethical and legal compliance in the workplace. It describes our policies and procedures in detail and should be treated as a fundamental decision-making tool.

I encourage you to study it carefully. If you have any doubts or queries, do not hesitate to discuss them with your supervisor or call our Ethics and Compliance Help Line immediately.

Thank you for continuing to uphold the values of our Company and our permanent commitment to promoting and maintaining an ethical, safe and responsible workplace.

A handwritten signature in black ink, appearing to read 'C. Ruiz Sacristán'.

Carlos Ruiz Sacristán

Chairman of the Board of Directors and Chief Executive Officer of IEnova

IEnova's Values

ETHICS

Doing the right thing

- Act honestly and with integrity.
- Be transparent and fair.
- Meet our commitments.
- Earn people's trust.

RESPECT

Value people

- Listen, communicate clearly, be sincere.
- Support people's diversity and respect their points of view.
- Contribute individually to the success of the team.
- Make safety a way of life.

EXCELLENT PERFORMANCE

Achieving outstanding results

- Set difficult goals and achieve them by acting with a sense of urgency.
- Reward outstanding performance and acknowledge other people's successes.
- Keep on learning and improving.
- Assume your responsibilities.

VISION OF THE FUTURE

Define the future

- Think critically and strategically.
- Anticipate the needs of the market.
- Be proactive.
- Implement with discipline and manage the risks.

RESPONSIBLE LEADER

Creating positive relationships

- Get involved, listen to opinions, cooperate.
- Support our communities.
- Be a responsible leader in environmental conservation
- Be consistent in your actions.

Honesty and common sense provide the best general guidelines for following appropriate behavior.

A Personal Responsibility

ENova's image depends on the behavior of its people, so each one of us has a personal responsibility to continue to watch for the precise fulfillment of an appropriate conduct.

The Code of Ethics covers general areas of legal and ethical principles for IEnova. We are all responsible for:

- Complying with all the national and international laws and the Company's policies and regulations.
- Maintaining appropriate ethical behavior.
- Being on the look-out for situations that could result in actions that are illegal or in breach of the Code of Ethics or the procedures that support it.
- Reporting suspicions or breaches of the Code of Ethics.

IEnova adheres at all times to the provisions of: (i) The Universal Declaration of Human Rights (UDHR), (ii) The United Nations Organization's (UN) Convention against Corruption, (iii) the Organization for Economic Co-operation and Development (OECD) Convention to Prevent Bribery of Foreign Government Officials; (iv) the 1977 US Foreign Corrupt Practices Act (in accordance with its reforms); (v) the Federal Public Procurement Anti-Corruption Law in Mexico; (vi) the Federal Law for the Prevention and Identification of Transactions with Funds of Illegal Origin (Mexican Anti-Money Laundering Law) and (vii) The Mexican Federal Criminal Code.(hereinafter referred to as the "Anti-Corruption Laws").

Therefore, IEnova requires its employees, when so requested, to complete the Corporate Ethical Training that includes but is not limited to the aforementioned Anti-Corruption Laws. We expect our employees to know and understand the meaning and requirements of the rules contained in the Code of Ethics, as well as their obligation to report when they believe that anyone has incurred in a breach of said rules or of the laws or this Code.

Employees who, irrespective of their place in the hierarchy, breach the Code of Ethics, the law or who act contrary to current policies and procedures will be subject to the applicable disciplinary measures that, should their actions constitute gross misconduct under the law, could include dismissal.

Employees who are in charge of personnel are also responsible for:

- Ensuring that all the employees under their responsibility are fully aware of these guidelines.
- Setting an example in complying with laws and ethical standards, displaying integrity, honesty and respect in all their acts.
- Encouraging an environment where employees feel confident enough to ask questions and report problems.
- Supporting employees who ask questions or mention their concerns.

The precepts contained in this Code are of general application to all the Company's employee or executives regardless of position, level of title. Therefore, all employees, executives, attorneys, managers and directors, including members of IEnova's Board of Directors and its various Committees will be understood to comply with the spirit of the Code in their daily activities and conduct at all times.



Rules for Ethical Decision-Making The Ethics Committee

To guide you in the application of the Code of Ethics, each section of this brochure contains questions and answers that help to clarify certain specific situations.

The Code of Ethics cannot cover every situation that might arise in our work. If questions or new situations arise that are not expressly contemplated, ask yourself:

- Is it legal and does it comply with the Company's policies?
- Is it fair, appropriate and consistent with the Company's ethical values?
- Have I already spoken with my direct superior about my doubts?

If you are still not comfortable with a situation, you can get in touch with the Corporate Ethics Department or call the Help Lines.

ENova has a free and confidential telephone help line and the Corporate Ethics Department:

Help Line 01-800-062-2107.

You also can address your communications to the confidential email: ienova@lineadedenuncia.com or via the web page: lineadedenuncia.com/ienova.

Both communication alternatives are exclusively devoted to answering questions about compliance with the Code of Ethics, the National Anti-Corruption System in Mexico, the Anti-Corruption Laws, the Corporate Ethics Policy, other Corporate Ethics issues, as well as receiving accusations about any possible breaches of them.

If you wish, you can also, anonymously and at no expense, call the Ethics and Compliance Telephone Line of our majority shareholder Sempra Energy on 01-800-241-5689 or through the Internet, by accessing the site <https://iwf.tnwgrc.com/Sempra>

These lines should not be used to present work claims or to report matters that are governed by a collective labor agreement or within a judicial process.

The Ethics Committee

The Ethics Committee's function, among others, is to analyze all possible breaches of the Code of Ethics by IEnova's employees or executives, as well as studying cases in which there may be doubts as to whether or not a specific action or omission breaches our standards of integrity,

The Ethics Committee consists of the Executive Vice President of Operations and Finances, the Executive Vice President of Development, the Executive Vice President of Corporate Affairs and Human Capital, the Executive Vice-President and General Attorney and the Corporate Ethics Director.

The Ethics Committee is chaired by the Executive Vice President and General Attorney and IEnova's Internal Auditor acts as Secretary. The Secretary is responsible for presenting the complaints received and keeping control of them, as well as preparing the minutes of each Committee meeting. In the same manner, the Secretary presents a quarterly report of the summary of all the complaints received and how they were dealt with to IEnova's Audit Committee.

Depending on the nature of the case, the Chairman of the Ethics Committee may invite other representatives to temporarily join the Committee, which will report to the Audit Committee.

Complaints may be received via different channels. These include but are not limited to IEnova's and Sempra's Telephone Hotlines, the Corporate Ethics Department, the Human Capital Department or directly with supervisors.

Once received, complaints are sent to IEnova's Internal Auditor, who will include them in the Ethics Committee's Order of Business for discussion. The Ethics Committee will determine if complaints constitute an alleged breach of the Code of Ethics, which case, they will be investigated by the Ethics Committee or if not, they will be channeled to the Human Capital Department to deal with other characteristics of the complaint.

If the Human Capital Department conducts the investigation, it will present its recommendation to the Secretary of the Ethics Committee.

At its monthly meeting, the Ethics Committee will analyze all the cases of possible breaches of the Code of Ethics by the Company's personnel as quickly as possible.

Both the investigation and the Committee meetings are confidential.

On the conclusion of each investigation, a report is prepared of the Committee's decisions. These decisions may include sanctions and even dismissal.

The disciplinary sanctions will be communicated immediately to the Corporate Ethics Department and the Human Capital Department documenting the measures taken.



Reporting Concerns Without Reprisals



INova's success in achieving legal compliance and an ethical conduct depends on every employee not only acting in accordance with the applicable laws and rules but also reporting the incidents that give rise to issues or concerns about the legal compliance and ethical conduct.

All reports about breaches of the Code of Ethics shall, as much as possible under the circumstances, be treated as confidential and be promptly, fairly and fully investigated.

All employees are expected to cooperate in any investigation. Measures will be taken, as and where appropriate, on the basis of the results of said investigation.

All employees are responsible for upholding INova's reputation and integrity. If you believe that another employee or executive, at any level, is breaching the laws, the Anti-Corruption Laws or the Code of Ethics, you must tell your Supervisor.

If, for any reason, you do not wish to discuss that information with your Supervisor, you can talk to the Legal Department, the Human Capital Department or via the help lines.

All information received through the help lines will be investigated. If you ask for an answer to your report, you will receive it. Any concerns and questions about accounting practices, internal accounting controls or auditing issues will be channeled to the Internal Audit Department.

Reprisals are not Tolerated

Employees can report concerns relating to breaches of the laws, the Anti-Corruption Laws or the Code of Ethics in good faith and without fear of reprisals. All employees at all levels are prohibited from taking reprisals against any person that reports said concerns.

Any IEnova employee who takes reprisals against another employee for having reported a concern of this nature in good faith or for cooperating in any investigation in relation to said concern will be subject to disciplinary action.



QUESTIONS AND ANSWERS

Q. What happens if I believe that reprisals are being taken against me for having reported a breach of the Code of Ethics?

A. Employees who responsibly report a breach of this Code in good faith, pose a problem or seek advice, are doing the right thing and no reprisals against them will be tolerated. All reports of breaches will, as much as possible under the circumstances, be treated as confidential. No employee, at any level, may either directly or indirectly take reprisals against another that reports a breach of the Code of Ethics.

If you suspect that you or someone you know has been a victim of reprisals for having reported a problem, tell your Immediate Superior, the Corporate Ethics Department, the Human Capital Department or report it through the help lines anonymously and at no expense.

Q. I noticed a situation that I suspect is a breach of the Code of Ethics. Should I report this situation even if I am not completely sure that there is a problem?

A. No reprisals will be taken against an employee who reports an anomaly in good faith, even if the accusation is not well founded. Good faith does not mean that the employee has to be right, just that they believe they are giving true and precise information. However, accusations made with the intention of damaging IEnova or harming a work colleague will not be permitted.

Standards of Integrity

Nº 1 - SAFETY

During its operations IEnova will give priority to the health and safety of its employees, its consumers and the general public, as well as to ensure full compliance with health and safety laws and regulations.

We have a commitment to provide and maintain a safe and healthy working environment, as well as a workforce that is properly trained, equipped and aware of the aspects involved with health and safety.

IEnova seeks to be a leader in the management of occupational and environmental risks; therefore, it has made a commitment to look after the health and safety of its employees and to conserve the environment in the areas where it operates.

Safety is a priority and no task is so important as to put the safety of its employees and consumers at risk.

If you detect any possible problem or breach of the safety rules or have any question on this matter, contact your direct superior, the Corporate Ethics Department or use the help lines.

Employees have the right and obligation to stop and report any act or condition that they consider not to be safe.

Reprisals against any employee who expresses a concern or makes an accusation about health and safety for Management to take a decision are forbidden.

No task is so important and no emergency so large that it is necessary to sacrifice the time required for a task to be completed safely.

VIII

LEARN MORE



To find out more about these types of situations, please consult the Health, Safety and Environment Policy.



HELP LINES

IEnova's Complaint line:

1800 062 2107

Confidential email:

ienova@lineadedenuncia.com

Sempre's Ethics and Compliance

Line: 01 800 241 5689

Or via the Internet on web page:

<https://iwft.tnwgrc.com/sempra>

These resources are at your disposal 24 hours a day seven days a week, please use them.



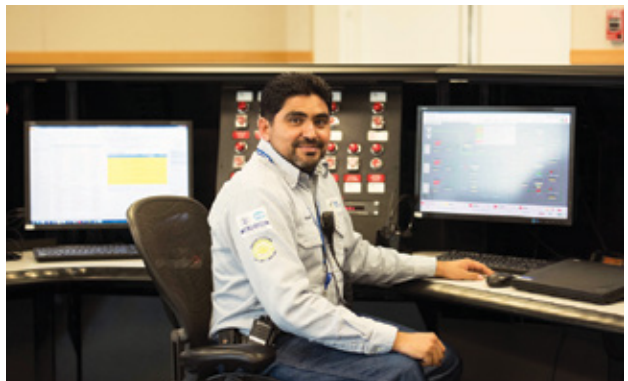
QUESTIONS AND ANSWERS

Q. Our group is under a lot of pressure to finish the project and sometimes my boss takes decisions that contravene the existing safety procedures. I don't want to cause any problems, but I would not like to see anyone hurt if something goes wrong as a result of these decisions, what should I do?

A. It is very important to follow the procedures, particularly when safety is at stake. No job or emergency can justify putting anyone's safety at risk. The conduct of your manager may result in an accident for you, your colleagues or the public in general. Safety must never be sacrificed to save time, money or for any other reason. You must inform your immediate superior immediately. If the problem persists or you are not satisfied with the explanation you are given, communicate your concern to higher levels, the Environmental Safety Department, the Corporate Ethics Department, the confidential email or call the help lines.

Q. My boss asked me not to report a minor injury that recently happened to me at work. I did not stop working because of this injury, am I right in reporting it?

A. IEnova's goal is to eliminate injuries, illnesses and accidents. To achieve this goal, every illness, accident and possible accident that occurs should be reported so that we can take the correct measures required to prevent them.





Nº 2 - CUSTOMER RELATIONS - PUBLIC SAFETY

We must attend to our customers' concerns and requirements professionally, quickly and courteously.

Our efforts must be aimed at providing a responsible service within the current regulatory framework. We will not discriminate or give any preferential treatment to any customer.

Any work performed on the property of a customer or a third party will be completed professionally and safely and when finished, the property will be restored to leave it, as far as possible, in the same conditions in which it was found. Looking after the needs of our customers includes a commitment to provide a safe service and protect public health and the environment.

We must protect public and private property from any personal or material damage, including extra care when driving the vehicles of the Company or those that are in its service, by avoiding dangerous maneuvers or driving too fast.

We also have a commitment to protect public safety in the Company's operations, equipment, facilities and operating systems.

This commitment means that the equipment, facilities and systems must be kept in good working order while at the same time using and maintaining operating practices and procedures that are in accordance with the prevailing practices and rules of the sector.

In the same manner, IEnova has implemented ethical principles in the use of the marketing tools of its products and services, thus demonstrating respect for consumers, the general public and the environment.

IEnova will respect and safeguard the confidentiality of all customer information or that results from any transaction with customers or about any services provided to customers.

Access to customer information will be limited to authorized personnel and will be used for the sole purpose of the Company's commercial activity.

No employee may disclose customer information to any third party without due authorization of the customer in question, except when permitted to do so by law or when disclosure is required in order to comply with the law or a legal order issued by a judge or court with due jurisdiction.

N° 3 - A WORKPLACE FREE OF DISCRIMINATION AND HARASSMENT

The IEnova family of companies is committed to offering all its employees the same opportunities for success regardless of race, color, nationality, lineage, citizenship, religion, physical or mental disability, medical condition, genetic information, marital status, gender, sexual orientation, sexual identity, expression of gender, age, military status, political affiliation or any other characteristic protected by law.

This principle of equality is respected at all levels, including the opportunities granted when electing member of the Board of Directors.

The Company does not tolerate discrimination, harassment or intimidation.

We treat all of colleagues, customers, suppliers and contractors with respect, justice and dignity.

Comments, jokes, drawings or conduct that in any way offend or discriminate any other person in the work place are prohibited. Intimidation is deemed to be any out-of-place and unreasonable behavior that denigrates, intimidates or humiliates other employees, either individually or as a group.

Intimidating behavior tends to be persistent and form part of a pattern but can also occur as a single incident. Do not allow inappropriate situations to be repeated if they are not reported in time, regardless of who is causing them.

If you observe or suspect possible discrimination or harassment at work, report it to the Corporate Ethics Department, your superior, the Human Capital Department or anonymously at no expense to the help lines.

A manager who becomes aware of a case of possible discrimination or harassment must report it immediately to the contact of the appropriate company. Any supervisor who fails to report this type of incidents will be subject to disciplinary action, which may include dismissal. The Company will investigate all reports of incidents immediately and take the steps necessary without any reprisals.



QUESTIONS AND ANSWERS

LEARN MORE

“
Please consult the Human Capital Department and the Corporate Ethics Department for further information on this matter.
”

Q. In my workplace, some people have sexually suggestive images on their computer screens. What should I do about it?

A. Any anomaly should be reported to your direct superior, the Corporate Ethics Department or the Human Capital Department or anonymously and at no expense to the help lines. Sexually suggestive images are unacceptable in the workplace and should be immediately removed. It is also against Company policy to send by any means, including the Internet, any material that could be considered obscene, derogatory, racist, sexual or in any way offensive.

Q. A work colleague has several times refused to give me information that is essential for my job, has called me derogatory names and commented to other work colleagues that I am not sufficiently trained to do my work. How should I handle this situation?

A. Harassment and intimidation can occur in several forms. In this case, it seems that one employee is intentionally and persistently intimidating another. Any worker who is in this situation must tell their direct superior, the Corporate Ethics Department or the Human Capital Department. Intimidation degrades the respect and trust that are essential for the way in which IEnova manages its businesses and therefore must not take place.





N° 4 - VIOLENCE IN THE WORKPLACE

Enova undertakes to maintain a violence-free working environment. Relations between the employees at all the levels in the hierarchy will be free from offensive words or actions, respecting the cultural and individual differences of each person working in the Company.

The following will not be tolerated in any part of the workplace:

- Firearms, munitions, explosives or any other type of object that could cause harm and accidents, unless they are expressly authorized.
- Threats or actions that put employees and others in danger.
- Physically violent contact or actions, violent verbal or written exchanges or threats of violence against employees or their relatives.
- Harassment, stalking or any other action that could be considered a threat.
- The intimidation of any employee by another in the workplace, for any reason.

LEARN MORE

Please consult the Human Capital Department and the Corporate Ethics Department for further information on these types of situations.

Employees shall not make threatening declarations or carry out intimidating actions, even when they do not consider such declarations or actions to be threats.

Any employee that carries out violent acts or shows threatening behavior will be subject to disciplinary action. The Company will cooperate with the police and the attorney general's office to bring charges against the offender.

The Security Department will investigate all reports immediately and take the appropriate action. It is very important that managers who become aware of any type of violence, report it immediately and failing to do so could result in disciplinary sanction.

Nº 5 - INTIMIDATION IN THE WORKPLACE

Intimidation is deemed to be any out-of-place and unreasonable behavior that denigrates, intimidates or humiliates other employees, either individually or as a group. Intimidating behavior tends to be persistent and form part of a pattern but can also occur as a single incident. In general, this behavior is individual, but can also be a group activity.

All employees are required to report any incident deemed to be intimidation at work. Do not let inappropriate situations happen again by not reporting them, regardless of who causes them. You should report them immediately to the Corporate Ethics Department, your supervisor, the Human Capital Department or anonymously and at no expense to the help lines.





QUESTIONS AND ANSWERS

Q. My friend and work colleague has told me that she feels threatened in her place of work because of problems at home. Her husband with whom she has been fighting a lot is threatening to come to the office and sort some things out. What should I do?

A. First, take this situation seriously, never ignore a potential threat. In a case like this, we are all responsible for evaluating any latent or potential danger to ourselves or to others. Notify your immediate superior, the Human Capital Department, the Security Department or the Corporate Ethics Department to get help with this situation.

N° 6 - USE OF ILLEGAL SUBSTANCES AND ALCOHOL

All employees must arrive at work capable of carrying out their duties safely and effectively.

They may receive a disciplinary sanction and even be dismissed from their job for gross misconduct, if:

- They arrive at work incapable because they are drunk or under the influence of drugs or narcotics.
- They use any hazardous substance or drug, illegal drug or narcotic. Employees who are under medical treatment with prescribed drugs that could potentially affect their conduct or productivity at work must inform their superiors.
- They use, possess or sell alcohol, illegal drugs or prescribed medicines with a harmful effect during working hours or on the Company's premises.
- They refuse to take a test when so required.

Under our Criminal Code, the possession or sale of drugs is a crime that carries a prison sentence. If you know of any employee who is committing this crime, you must report them immediately.

LEARN MORE

“ Consult the Policy on the Use of Alcohol and Controlled Substances (CH-17).



QUESTIONS AND ANSWERS

Q. What happens if my anti-doping test is positive?

A. If you are a consumer of any drug, the possibility exists that this drug will be detected in your urine after the consumption of a single dose; therefore, we recommend you do not use any substance that contains cocaine, including coca leaf, which can be easily detected by lab tests. If the result of a laboratory analysis is positive or suspicious, a confirmatory anti-doping hair test will be used.

Although our laws do not criminalize the consumption of drugs, these can affect your employment in the Company, section XIII of Article 47 of the Federal Labor Law considers as grounds for the rescission of the employment relationship when the employee arrives at work in a state of drunkenness or under the influence of a narcotic or stimulant drug, unless, in the latter case, they have a medical prescription. Before starting work, the employee should tell the employer and present the prescription signed by a doctor.

Q. A work colleague sometimes comes back from lunch slurring his words or fighting to stay awake. He seems to be under the influence of drugs or alcohol. What should I do?

A. Talk to your direct superior, the Corporate Ethics Department, the Human Capital Department, or call the help lines. Your call is confidential and can remain anonymous. For the safety of all personnel, no employee is allowed to remain in the workplace when they cannot do their job properly.

Nº 7 - CONFIDENTIALITY AND PRIVACY

You are responsible for protecting all the confidential information you obtain or that is under your control. This information will be used in accordance with the legal rules, contractual obligations, the Company's policies and only for matters relating to IEnova.

You must comply with all the information confidentiality and storage requirements. These obligations refer to the Company, employees, customers and to the private information of third parties.

Only disclose confidential information to people who, because of their interests with IEnova, need to know.

Its protection is vital for the future success of the Company and could be important for the security of all the employees; therefore:

- Do not disclose confidential information to people outside the Company, including relatives. Do not obtain confidential information by inappropriate means.
- Never leave confidential files or documents out where others can read them.
- You should never answer questions asked by the media about the Company's private information, unless you are authorized to do so.
- Do not take Company documents with you when you leave the office.

IEnova respects the privacy of each employee and customer, and only collects and stores the personal private information that the law permits it to do for the effective operation of the Company in accordance with its Privacy Notice.

IEnova looks after and limits access to the personal information of our employees and customers. This information should not be accessed, used or distributed unless there is authorization

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To learn more about how to handle these types of situations, consult documents LG-01 “Privacy Policy” and LG-06 “Information Disclosure Policy”.

to do so to satisfy the Company’s legitimate needs and in accordance with all the existing laws and regulations and in accordance with its Privacy Notice.

Company information may be kept in portable electronic devices, such as laptops, electronic agendas and mobile phones. You must also protect these electronic devices in accordance with the information security policies and procedures.



QUESTIONS AND ANSWERS

Q. I can get ahead with my day’s work by returning phone calls while I am going to work on public transport. Is there a problem?

A. You should take care not to talk about the Company’s confidential information in public places such as restaurants, elevators, conferences and exhibitions or on public transport. When you have to make a phone call in a public place, be very careful about who is around you.

Q. I know that some of the information I am working on is confidential. Does this mean that I cannot talk about this information with anyone, even other employees?

A. Confidential means that the information should be safeguarded. This information can only be treated as per the respective Company policy and in accordance with each person’s contractual and legal requirements, and even bearing this in mind, said information should only be shared with those people who need to know it for matters related to the Company. If you have any doubts, ask your direct superior or the Legal Department.

Nº 8 - ENVIRONMENTAL PROTECTION

ENova undertakes to protect and conserve the environment. The environmental protection laws, regulations and requirements affect nearly every aspect of the Company.

We comply with all the environmental laws and regulations. It is your responsibility to understand the environmental problems that have an impact on your job.

You should also do your job in a way that is consistent with the Company's policies and procedures.

If you see a potential problem or breach, or if you have any doubts, talk to your direct superior, the Safety and Environment Department or call the help lines anonymously and at no expense.

We are committed to conserving the environment, through the prevention of any adverse environmental impact incurred by our operations, carrying out activities such as recycling, the minimization and final disposal of waste, using secure, efficient and environmentally-friendly methods.





QUESTIONS AND ANSWERS

Q. We have a contractor that does some work for IEnova. I know some of the people who work for this contractor and they told me that they may not be doing their work in a way that is consistent with the environmental requirements. Does this matter? After all, it is not our Company that is doing the work and it is probably saving us all money by doing it this way.

A. Yes, it does matter. What the contractor does could even make IEnova liable.

But, even when there is no liability for us, we are still concerned. Doing things the right way means not ignoring the fact that we know someone we are working with is doing something wrong. Do the right thing. Talk to your direct superior or get in contact with the Legal Department or the Internal Audit Management or communicate the fact by email and through the help lines.

Nº 9 - ACTIVITIES IN FAVOR OF THE COMMUNITY

Our Company is proud of its commitment to the community. We take actions and invest resources, time and talent to improve the quality of life of millions of our compatriots.

IEnova offers a corporate voluntary work program that brings help to people in need of our areas of work by contributing with the materials and logistics.

In order to guarantee that contributions to public charities and sponsorships made in the name of the Company are given the best use, authorization is required from IEnova's Corporate Affairs, Human Capital and Corporate Ethics Departments, following the necessary due diligence. These contributions include donations, sponsorships, memberships and gifts for community organizations and institutions, as well as for civil and community groups that meet the requirements for these types of contributions.

Donations to the community and non-profit charitable institutions must be recorded and documented in accordance with the formal procedure that establishes the levels of authorization and approval necessary, as well as the respective anti-corruption review in accordance with the current policies and procedures. If in doubt, please consult with the Corporate Ethics Department.



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For further information on this issue, please consult the Corporate Ethics Policy (EC-01), the Anti-Corruption Procedure for the approval of Donations, Sponsorships, Improvements and Memberships (EC-01-P01) and the Indigenous Communities' Support Procedure (EC-01-P03).



QUESTIONS AND ANSWERS

Q. I was invited to attend a fund-raising dinner and sat at a table sponsored by the Company. I bought raffle tickets during this supper. How can I be reimbursed for the purchase of these tickets?

A. Although you were present at the event in representation of the Company, the Employees' Business Expenses Policy (FI-18) does not permit the reimbursement of these types of contributions. If you bought a raffle ticket and won, or were the successful bidder in an auction, the benefit would be yours and not the Company's.

Nº 10 - ANTI-CORRUPTION

Corruption, defined as “the abuse of a public or private office in order to obtain a personal benefit” is a complex phenomenon that affects different spheres of society. It is widely known that corruption threatens the sustainable development of countries, opens the door to the breach of human rights, distorts markets and inhibits investment thereby affecting economic growth.

Enova, aware and committed to this situation, is committed to achieving success on the basis of the quality of its people and services, and not through corrupt, unfair and unethical practices. The Company and its employees are required to comply with all the Anti-Corruption Laws, wherever we do business. Bribing civil servants is illegal. Bribery is understood as the offer of cash or valuables to someone in order to gain a favor, a contract, business or a benefit of any type or scale or conversely, to avoid compliance with a particular obligation.

The Anti-Corruption Laws prohibit giving anything of value or making payments in exchange for favors from officials, candidates, or political parties. This prohibition extends to the friends and relatives of civil servants.



All employees or representatives of our Company involved in foreign transactions or activities are required to comply with anti-corruption standards.

Enova conducts its business with honesty, integrity and in accordance with ethical and legal standards, and expects and works so that its employees to comply with all applicable laws at the place where business is conducted.

Our Federal Anti-Corruption Law in Procurement prohibits companies and their intermediaries from making undue payments to civil servants and others in order to obtain or retain business opportunities. The Law establishes the responsibilities and penalties applicable to Mexican and foreign individuals and companies that participate in the federal procurement contracts contemplated under such law, as well as Mexican individuals and companies for breaches incurred in their participation in international trade transactions with public institutions of other countries, or in the processes relating to the granting of permits or concessions by such institutions.

Additionally, individuals may be punished with disqualification from participating in federal procurement contracts for periods of up to eight years, while corporate entities can be punished with disqualification from participating in federal procurement contracts and the granting of permits or concessions for periods of up to ten years.

Before hiring any individual or organization whose services, from the perspective of IEnova, involve any form of interaction with civil servants or government organizations, their related backgrounds must be checked to find out about the reputation of such organizations, representatives, or consultants and thus ensure their honesty, integrity and quality prior to carrying out transactions with them.

In turn, the Foreign Corrupt Practices Act (FCPA) and the Organization for Economic Co-operation and Development (OECD), (and the ratifying laws passed by the signatories

of the OECD Convention, which includes many countries in which our shareholder currently has operations) consider it a felony for companies, as well as by their officers, directors, employees and agents to promise or give anything of value to a foreign government or to a government officer, political party, officer or candidate of a party with the purpose of obtaining or retaining business or of obtaining any undue advantage.

The FCPA was enacted in 1977 with the purpose of sanctioning the practice of bribery of foreign officers by subsidiaries of American companies in order to obtain business. It contains two main assumptions: (i) the prohibition to pay bribes and (ii) the obligation to maintain accurate and fair Accounting and Internal Control Standards.

As IEnova is a subsidiary of an American company (Sempra Energy), the actions performed by IEnova and/or its employees that contravene the FCPA and its amendments may cause liability for Sempra and its Subsidiaries, in addition to contravening this Code.

In order to prevent actions contrary to the Anti-Corruption Laws, the following must be considered and complied with:

1. Forbidden payments are those outside the ordinary, gifts (of any amount) or extraordinary attention or gifts of significant value made with Company funds to civil servants or intermediaries in order to obtain or retain business or to influence any matter unduly in favor of the Company.
2. The Company must reflect all its transactions in its accounting. Each transaction must have appropriate authorization. Any exception must be reported to your supervisor and to the Legal Department of the Company.
3. Any practice that breaches the Anti-Corruption Laws, as well as the use of intermediaries for this purpose is expressly forbidden.

4. The use of intermediaries to make corrupt payments is forbidden.

5. No secret or funds or assets that are not registered will be maintained.

6. Any executive or employee of the Company who becomes aware of any forbidden transaction must report it to their supervisor, the Corporate Ethics Department or the Help Line.

The Corporate Ethics Department must implement an ongoing corporate ethics program that will be promoted and enforced consistently at IEnova. Said program contemplates, among other elements, the obligation to train and in certain cases, certify IEnova's employees and executives in the Anti-Corruption Laws.

It is very important for the Company to have high ethical conduct standards; therefore, the guidance of a person who understands the subject is needed when the complexity of the situations that arise require it.

The appropriate channel to obtain the necessary guidance is your immediate superior, who is the first source of counsel about our questions. Each employee should contact his/her boss and discuss any question about the interpretation and jurisdiction of the Code of Ethics.

If for any reason you do not wish to discuss this information with your superior, you may go to the Corporate Ethics Department, the Human Capital Department or use the Help Line.

The Help Lines should not be used to file work complaints or to report matters that are governed by collective work agreements.

Consult any proposal that involves an organization or individual that interacts with the authorities or government institutions as part of its services to IEnova with the Legal Department.

Before paying for a meal or a trip for a Civil Servant, consult the Civil Servants' Representation Expenses Anti-Corruption Procedure (EC-01-P02). In case of doubts, contact the Corporate Ethics Department.





QUESTIONS AND ANSWERS

Q. I am working with a representative of a Company that is helping me to expedite paperwork procedures to approve a project. I am worried and concerned that part of the money we are paying the representative is being used to bribe government officials, but I am not sure that any bribes have been paid. Could this hurt the Company?

A. Indeed, IEnova does not condone such practices, and could be liable for bribes made to government officials even when they went through a representative, contractor, or subcontractor. We cannot shirk responsibility by “turning a blind eye” when circumstances point at a breach of anti-bribery laws. You should report this case to the Corporate Ethics Department immediately to help investigate the amount of bribes that were paid, if any. Remember, you should also investigate representatives and contractors before hiring them to ensure that no bribes have been paid.

Q. I understand, and I take into account the Company’s desire to comply with ethical standards but sometimes it’s difficult to do that and remain competitive. I will surely lose a large contract if I decline to bribe to a local official. Does the Company really want to lose this business?

A. Yes. IEnova prefers to lose business than win it through a bribe or by other underhand means. The loss of reputation and credibility in the long run will be much greater than the short-term benefit of winning that contract, and more importantly, it is not worth our while to breach laws and our ethical standards to win a contract. If you are faced with this type of situation, notify your immediate supervisor, the Corporate Ethics Department, the Human Capital Department or call the Help Lines.

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To learn more about this issue, please consult the Corporate Ethics Policy (EC-01).

Nº 11 - PARTICIPATION IN POLITICS

IEnova and its affiliates respect the right of each of their employees to engage in political activities. However, when they express themselves on public issues or have an involvement in such issues as citizens, employees must make clear that their actions and views are their own and not those of IEnova.

IEnova will not make direct or indirect political contributions to finance the activity of a party or a candidate in any election, whether Federal, State or Municipal. In cases in which employees made political contributions, these are strictly personal decisions and IEnova rejects any association of its name with these contributions.

Political contributions are considered donations in money or in kind, the purchase of tickets to party events, the provision of free services with the Company's staff and executives' and employees' contributions charged to the Company's expense accounts.

In addition, giving gifts or courtesies to political officials, relatives or employees, is prohibited.

You must consult the Corporate Ethics Department before contacting a politician or giving a gift or courtesy.

Employees who wish to support candidates or political parties of their liking must not do so during working hours. Furthermore, they must not use the Company's facilities or assets for that purpose.



QUESTIONS AND ANSWERS

Q. I have been asked to serve in the public sector. Should I accept?

A. Although our Constitution establishes the fundamental right of an individual to participate in the political life of the country and to be elected to a government or public position, it is advisable to check with our Corporate Ethics Department to check whether the

job offer would place the employee and IEnova in a difficult position by creating a conflict of interest.

N° 12 - FAIR COMPETITION

IEnova and its affiliates will compete to perform commercial activities fairly and cleanly, based on tariffs and quality of services, while maintaining an ethical attitude towards competitors.

We comply with the law on free competition, obtaining of competitive information and dealing with our competitors.

The Company and its employees must comply with all anti-monopoly laws and must not take part in illegal, anti-competitive, acts including requesting or accepting confidential or competitive information obtained by illegal means and agreements to fix prices, manipulate or divide markets, limit production, or other action that may unjustly obstruct competition.

IEnova does business fairly with customers, suppliers, and competition, and does not take unfair advantage through manipulation, fraud, or misrepresentation of material facts.

We are all responsible for maintaining that trust. You must make full and true statements about our services, or those of our competitors.

IEnova employees who have had prior connections with a competitor must not disclose confidential or proprietary information of such competitor.

If you detect a breach of competition laws, consult with your immediate supervisor, the Legal Department or call the Help Lines.

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As leaders, we are responsible for guiding business strategy accurately within a framework of integrity, honesty and respect and for reinforcing the commitment and participation of all staff.



Nº 13 - RELATIONS WITH THE GOVERNMENT

The activities relating to the business of IEnova are regulated by specific laws, whose review, regulation, and supervision is exercised on behalf of the State by different government agencies (Ministry of Energy, Energy Regulatory Commission, and Ministry of the Environment and Natural Resources (among others), all of which are responsible for ensuring compliance with the law.

It is IEnova policy to comply with all applicable laws and regulations, maintaining good relations and communications with government agencies and working closely with them. As IEnova's business activities are regulated and work to obtain positive rules in the future, this conduct is critical to our success.

We must cooperate in a fair and honest manner with agencies and Government officials, exercising correct judgment, and displaying absolute integrity in our actions to:

- Ensure that all responses to reasonable requests for information by government and regulatory agencies are delivered in a timely, accurate, and complete manner.
- Ensure that the Company is represented in a professional manner, with honesty and integrity, when appearing before government agencies.

We must always operate according to our Corporate Ethics Policy. All information provided to the authorities must accurate and government officials should be treated honestly and ethically. Therefore, employees who have contact with government entities should not generate an apparent or real conflict of interest for officials.

All activities that could be interpreted as an attempt to obtain approval or to influence government activities should be checked with the Company's Corporate Ethics Department. However, situations may arise in which IEnova deems it necessary to refute or oppose governmental or political requests, decisions, or existing or proposed

government measures, including regulatory and legislative measures.

In these cases IEnova is committed to engage in arbitrary, judicial, or administrative actions and represent its interests and points of view in this regard responsibly, professionally, and truthfully, as well as with honesty and integrity.



QUESTIONS AND ANSWERS

Q. A government institution is asking for urgent information, but I do not have it, I don't want to get the Company into trouble, so I am going to forge a document and send it to the authority to avoid a fine.

A. By forging a document, IEnova is presenting false information to the authorities, thereby causing serious damage by calling into doubt the accuracy of the information we provide to Government departments. IEnova prefers to pay fines as opposed to providing distorted or falsified information to the authorities.

Q. I know that I am going to receive a notification from the authorities but the time that will be given to comply is very short. Can I refuse to receive the notification to gain time?

A. No. The information that we provide to the authorities must be accurate even if it might harm us, if the deadline is tight, an extension can be requested.

N ° 14 - ACQUISITION OF GOODS AND SERVICES

Third party perception of ethical standards is particularly critical in the case of employees directly involved in provision or supply of goods and services activities, as well as that of other employees who are in position to influence relations or provision or supply decisions.

To ensure that procurement procedures are transparent and that all doubt is ruled out, at the start of the bidding process, suppliers must be informed of the Company's Purchasing Policy, which will be strictly observed throughout the process.

Providers should be treated with equality, fairness and justice, ensuring that no vendor is given preference or has unfair advantage over others, or is discriminated against.

Decisions regarding provision or supply of goods and services should be based on objective criteria, including quality, price, reliability, availability and services.

Employees must comply with current procurement policies and procedures, including the confidentiality during the process and must abide by the Conflict of Interest Policy.

The Company does not practice or approve reciprocity with the suppliers on any part of the business. The materials or services required by the Company are purchased strictly on the basis of merit.

Goods or services manufacturers' or suppliers' economic proposals must not include training, supervision of manufacturing process or similar trips, which, if approved by IEnova, must be billed separately.

Everyone involved in the goods and services acquisition process must conduct themselves so as to demonstrate that justice, equality and fairness are paramount to IEnova with respect to provision or supply decisions.

LEARN MORE



To learn more about this subject, please consult the Purchasing Policy (CO-01).





QUESTIONS AND ANSWERS

Q. A provider is offering us an overseas training course if we buy a certain product. Can we accept the course?

A. No employee should seek or receive free training courses or other favors from a supplier if this is not considered as part of the cost and conditions of sale of the product; otherwise this could represent a compromising situation for IEnova.

N° 15 - REGULATORY COMPLIANCE

IEnova is subject to laws and regulations governing activities relating to hydrocarbons, as well as the electricity generation and export business. Many of these are complex and difficult to interpret; however, ignorance of the law does not exempt IEnova or any employee from the obligation to comply with such regulations.

To make our business successful, we have to be familiar with these rules and regulations and to understand and operate in full compliance with the same and with any legal or ethical standards and values adopted by IEnova. To make our business successful, we have to be familiar with these rules and regulations and to understand and operate in full compliance with the same and with any legal or ethical standards and values adopted by IEnova. This is indispensable to make our business successful.

IEnova expects all agents, including contractors, suppliers and consultants who do business with or for IEnova to comply with all laws and regulations.

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It is IEnova policy to comply with all applicable laws and regulations, maintaining good relations and communications with government agencies and working closely with them.

To ensure such compliance, it is necessary to investigate any alleged breach of the law. If the result of the investigation concludes that there has been breach of any provision, the appropriate disciplinary measures will apply, and a lawsuit or compensation for damages may also be sought.

No unsupported allegation will be included in the personal file of an employee nor will any such allegation be considered when evaluating such employee's performance or potential promotion.

We must also be informed and ensure the enforcement of laws relating to infringements of copyright and piracy of software

Nº 16 - BUSINESS GIFTS AND COURTESIES

Gifts or exchange of courtesies should never suggest preferential treatment such as better prices or more favorable conditions for sale or contracts. Never ask for a gift or courtesy or accept cash or its equivalent.

Do not use your position in the Company to request vendors to provide preferential personal treatment.

In most cases, you can accept or you can give a business courtesy gift under these conditions:

- The gift or courtesy is consistent with accepted business practices and has a value that is determined by local custom or industry practices.
- Public disclosure would not have a negative effect on the Company or the persons involved.
- You must report it to your immediate superior so as to prevent others from misinterpreting the gift or courtesy as something other than a simple gift.

Over and above these limited situations, personal benefits from third parties should not be accepted as they could generate a bad image for the official, calling to doubt his integrity.

Gifts received by an employee that are not consistent with the provisions established must be returned to the donor with an explanation of our standards of integrity.

If you have any doubt of whether a business gift or courtesy is appropriate, consult your immediate superior or the Corporate Ethics Department.



QUESTIONS AND ANSWERS

Q. I am currently refurbishing my house. One of our suppliers with whom I have business relations informed me that I could buy the electrical, household appliances and other materials using his account number and thus receive a company discount. I will pay all expenses, including delivery. Can I accept this offer?

A. Employees should never put themselves in a situation that forces them to accept gifts or other favors from suppliers. No matter how innocent the favor is, this could be interpreted as a favor made to influence the functions and duties of the employee. Gifts include not only material goods. They also include services, discounts, and personal purchases of goods and services that are not available to the general public and other employees. You cannot buy materials by taking advantage of the discount from the supplier.

Q. I want to give a very special thank you gift to one of our best customers. I have tickets to a football game that I know that he would like but I think that it is against his company's policies to accept. If that does not worry him, can I give him the tickets?

A. No. If you know that giving a gift breaches the policies of the recipient's company, you cannot give the gift. If we want others to respect our rules, we must respect theirs.

N° 17 - STOCK TRADING

Information is considered reserved or privileged whenever it is not disclosed in the market and which, in the light of its nature, could potentially influence the liquidity, price, or quote of securities issued by the Company if made public, causing damage, endangering the Company's competitive position, or affecting the normal course of its activities.

It is forbidden to buy or sell Company shares when you possess material non-public information.

The Securities Market Law contains specific provisions regarding the use of privileged or 'insider' information, including:

- The obligation for persons who have such information to refrain from (i) carrying out transactions with securities of the respective issuer, either directly or indirectly, whenever the securities quotation price of such issuer may be affected by such information; (ii) recommending to third parties (except to those entitled to know such information because of their positions or jobs) the performance of the above-mentioned transactions; and (iii) carrying out transactions with optional titles and derivative financial instruments with underlying shares issued by the entity to which such information belongs; and
- The obligation to notify the National Banking Commission and Securities Commission (CNBV) of transactions carried out with the shares of the issuer: (i) the members of the Board of Directors of the issuer; (ii) the holders of 10% or more of its capital stock; (iii) the holding groups of 25% or more of the shares in the issuer; and (iv) any other persons who have privileged information.

Similarly, the Securities Market Law establishes that persons who have privileged information must refrain from purchasing or selling issuer securities in the 90 days following the most-recent sale or purchase, respectively. Subject to certain exceptions, any acquisition of shares which results in the purchaser being the holder of at least 10% but not more than

30% of the share capital of the issuer must be reported to the CNBV and to the Mexican Stock Exchange (BMV) no later than the working day following the acquisition.

Any share purchase by a person who has privileged information, implying an equity share in excess of 5% or more in addition to the capital stock of the issuer must also be reported to the CNBV and BMV no later than the working day following the acquisition. Some of the persons with privileged information must also notify the CNBV of share purchases and sales carried out within a period of three months or five days and that exceed certain minimum amounts. The Securities Market Law also establishes that convertible securities, optional titles, and derivative financial instruments must be taken into consideration for the determination of these percentages.

Among other things, the CNBV regulates the public offering and the brokering of securities and imposes penalties for the illegal use of inside information, which may involve criminal liability.

Pursuant to the above, the use of confidential information obtained at IEnova and/or its subsidiaries and/or affiliates to carry out securities transactions either directly or through persons to whom that information has been transmitted, is strictly prohibited.

In particular, all the staff of IEnova and/or its subsidiaries and/or affiliates must avoid carrying out transactions involving IEnova shares based on information that may be regarded as inside information in terms of the Securities Law or Securities Laws of other countries. Given the nature of IEnova's services, you may have access to inside information.

Based on the foregoing, employees of IEnova and/or its subsidiaries and/or affiliates are restricted from directly or indirectly investing in shares or other capital securities (excluding investment companies) that have relations with IEnova and/or its subsidiaries and/or affiliates, either in Mexico or in other jurisdictions. To learn more about the scope of these limitations, please contact IEnova's Legal Department before proceeding with any transaction.

ENova considers it vitally important to take precautions to ensure that the information provided to the market is truthful, adequate, and timely to thus promote transparency in the stock market and provide adequate protection to shareholders and investors.

In case of doubt or if clarification is required, please contact ENova's Legal Department.

LEARN MORE

To learn more about this subject, please consult the Privileged and/or Confidential Information and the Purchase and Sale of Securities Treatment Policy (LG-03).



QUESTIONS AND ANSWERS

Q. My family and friends often ask me about the Company and if they should buy shares. I usually tell them about our business and suggest they should buy shares. Is there a problem?

A. Provided material or confidential information is not shared and that offer recommendations or tips based on confidential information are not offered, it is your decision to recommend the buying of shares in the Company. Do not forget that it is sometimes difficult to separate confidential information from public information.

Q. A contact of one of our suppliers tells me that they are about to buy another company. The acquisition has not been reported and, once announced, I think this will increase the price of the shares in that company, so I would like to buy shares. Can I do this? And if I can't, can I share this tip with my brother?

A. The answer to the two questions is no; if you buy shares or encourage someone else to do so, you would be breaching the confidential information regulations.

N° 18 - CONFLICTS OF INTEREST

A conflict of interest may arise in any situation where there is a division of loyalties among your personal interests and your obligations to the Company.

You must make all your work decisions based on the best interests of the Company and not on your personal interests.

To prevent harming yourself and the Company, you must avoid any activity that apparently involves a conflict of interest.

Pay special attention to possible conflicts of interest with clients, suppliers and competitors.

A conflict of interest may arise, for example, if a family member works for one of our clients or has a strong financial interest with a client, supplier or competitor of the Company.

You must not accept opportunities, commissions or commercial discounts from other persons or companies as a benefit of your position at IEnova and you may not use other persons to do indirectly what you are not allowed to do.

If you are thinking about having another business or job apart from your job at IEnova, make this known to your immediate superior or to the Human Capital Department. They can help you make sure your activities outside work do not constitute a conflict of interest.

Direct family members are not allowed to work for the same superior, in the same cost center or in a position where one of the family members has any direct responsibility of supervising, checking or managing the other family member. If this situation exists, one of the employees must be transferred to another position so that this situation ceases to exist.

Finally, IEnova does not wish to interfere with your activities when you are not working for us, but we are interested in that your behavior does not harm your reputation or affect your work or cause a conflict of interest.



QUESTIONS AND ANSWERS

LEARN MORE

“ To learn more about this subject, please consult the Independence and Conflicts of Interest Policy (CH-02) or the Corporate Ethics Department. ”

Q. I would like to recommend my spouse's company to be a supplier of our Company. Is that all right?

A. Yes. You may recommend your spouse's company to be a supplier, but you must make your relationship known to your immediate superior. In addition, you may not be involved in the decision making to engage this company or in supervising its work. Getting involved in the process personally, including pressuring somebody else to engage it represents a conflict of interest.

Q. Is there any restriction if I accept another job outside the Company?

A. Yes. Any job outside the Company must not create, or apparently create, a conflict of interest with your duties. You must keep your other job completely separate from your job at IEnova. You may not use the name, information, time, property or other resources belonging to IEnova at any time to perform your other job.

Q. Some clients consider that the cost of the services in the non-regulated businesses offered by IEnova and its associated companies are very high and they prefer to seek another option. May I offer them my services or those of my family members or friends?

A. No. That would be unfair competition to your advantage or to the advantage of third parties. Offering services to third parties that have been previously requested from IEnova or that you as an employee know that they are going to be requested, offering the same services is taking advantage of your knowledge, function or position in the Company.

N° 19 - INTELLECTUAL PROPERTY

IEnova recognizes and respects the intellectual property of others. It cannot acquire confidential information or information that is the property of other companies through dishonest means such as deceit or falsehood, nor any information from its present or former employees.

Be careful when you use copyrighted materials. Copying, using or distributing copyrighted material wrongfully without its owner's permission is a copyright breach.

Copyrighted materials include those downloaded from the Internet, as well as computer software.

Creating copies of copyrighted material without authorization is a breach that is subject to sanctions. You must obtain the owner's permission to be able to reuse copyrighted material.



N° 20 - INTERNAL BUSINESS CONTROLS

INova's internal controls are designed to protect the Company's assets, documents and other properties covered by these standards, as well as preventing the fraudulent handling of money.

You are responsible for understanding and complying with these internal business controls and all their policies and procedures.

If you are a witness to a control being ignored or avoided, or if you are worried about your effectiveness, report this situation to your immediate superior, the Corporate Ethics Department or call the Help Lines.



QUESTIONS AND ANSWERS

Q. I am enrolled in postgraduate studies. May I submit a paper about the activities performed by INova?

A. You must first request your superior's authorization, letting him/her know what study you will perform and you must be careful not to expose confidential information, or programs, work or other methods that are part of the Company's intellectual property.

N° 21 - FINANCIAL INFORMATION

The integrity of the Company's financial information is crucial to our operations, as well as to maintain the trust of our employees, shareholders and other interested parties.

Every transaction must be duly recorded, classified and reported in accordance with INova's accounting policies. These policies comply with accounting standards generally accepted both locally and internationally and with the applicable laws and other regulations.

The accounting managers and personnel are responsible for ensuring that the financial and accounting practices fully support the fair, accurate, timely and clear disclosure of the Company's financial results and conditions.

All employees are responsible for reporting clear, accurate and honest information in all the Company records they produce, including reports, expense reports and other documents.

If you have any questions about the how to record a transaction correctly, please contact the Comptroller's Department.

If you feel you are being asked to create a document or to report a dishonest or inaccurate transaction, report it to the Corporate Ethics Department, your immediate superior or call the Help Line immediately.

Our books, records and accounting reflect the transactions accurately and objectively, with a reasonable degree of detail and in accordance with the generally accepted accounting principles, the laws and other applicable regulations.

N° 22 - UNDUE OR QUESTIONABLE PAYMENTS AND COLLECTIONS

All agreements with government entities, clients, suppliers and others, must be formalized in a written contract in accordance with our policies and procedures.

All payments and collections performed by the Company must be related to services and/or goods (movable or real estate) effectively received and their instrumentation must be based on invoices approved by the person responsible for the department, in accordance with our policies and procedures.

In compliance with the Anti-Corruption Laws, no payments from the Company's funds will be admitted for the benefit

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To learn more about this subject, please contact the Comptroller's Department.



of a government representative, any current or potential customer or any supplier, with the purpose of securing a favor from the government, a sale, a purchase or contract or any other commercial advantage.

This prohibition refers to direct or indirect payments made to third parties and it has the purpose of preventing bribery, commissions, or any other form of retribution.

Payments made in-kind, such as giving the Company's assets or other kinds, rendering of services and any other acts with an economic value are considered within the concept of forbidden payments.

In accordance with our policies and procedures, no employee is authorized to receive money directly or indirectly from collections from clients, contractors, suppliers or third parties in general.

In accordance with our policies and procedures, collections will be performed solely through the authorized channels and against the receipt of the respective collection document.

In you have any doubts, consult the Corporate Ethics Department.





QUESTIONS AND ANSWERS

Q. We need to have a quick and costly repair done in our facilities. To accelerate the process, my manager assigns several purchase orders to the same supplier. I know this saves us from going through the approval controls, but I am sure that our superior would approve this expense anyway, and we save time and finish the job. Is this correct?

A. No. The internal business controls have been created to ensure that these expenses are authorized and recorded correctly. Avoiding the compliance of procedures weakens these controls.

Q. My department exceeded its annual budget. New equipment is ready to be bought and delivered. Should I defer its delivery so as not to affect the budget even more?

A. No. The status of the budget is irrelevant. The goods or services received, supplied or used must be recognized as an expense in the respective fiscal year.

Q. My manager asked me to delay sending invoices to accounts payable until the next quarter. What should I do?

A. If you believe said goods or services are not being posted in accounting in the correct period, you should speak to your Manager or the Comptroller's Department.

N° 23 - THE COMPANY'S ASSETS

The term 'assets' includes the facilities, equipment, supplies, machines, materials, tools, vehicles, cash funds, information, including electronic data and other used to conduct the Company's business. Every single employee is responsible for conserving and using the Company's assets correctly and for making sure they are used efficiently for legitimate business purposes. Theft, negligence and waste have a direct impact on the profitability of the Company. Therefore, you must:

- Purchase assets in accordance with the Company's policies.
- Use the Company's information and properties only for business purposes and only for legal and ethical activities.
- Protect assets from damage, waste, loss, misuse and theft.
- Use assets only with the proper authorization.

The Company's electronic assets, such as computers, telephones and mobile telephones, fax machines and photocopiers are intended for use in the Company's activities. Personal and limited use of these goods is acceptable, if it is occasional and it does not result in excessive costs, does not interfere with your work responsibilities, and complies with IEnova's regulations and policies.

All the other Company assets, including vehicles, construction equipment, tools and internal information, must be used solely for the Company's purposes, unless specific authorization for another use is obtained.

Be considerate when you travel for Company business.

Keep your expenses reasonable and request reimbursement only for the expenses related to the business in accordance with our policies and procedures.

Report all expenses accurately and promptly in accordance with our policies and procedures. IEnova, with the authorizations and guarantees stipulated by law, reserves the right to examine computer hard disks and other data storage media in its installations, monitor and read emails, monitor Internet activity, listen to telephone conversations or perform other activities related to the collection and monitoring of electronic communications.

The IEnova brand and its logotype represent our business and our reputation; and therefore you should protect them as one our most valuable assets.

If you have any doubts, consult the Corporate Affairs and Human Capital Departments.



QUESTIONS AND ANSWERS

Q. In my department area there are several computers that are not used. May I give them to my child's school?

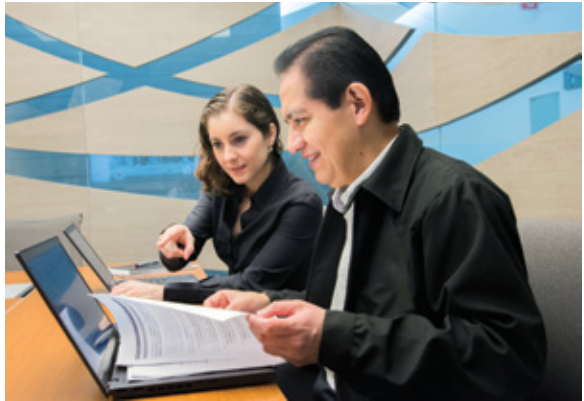
A. We must not take, use, sell, lend, or give away the Company's assets, unless expressly authorized in accordance with the IEnova donation policy. This also applies to using excess, obsolete or discarded objects.

Q. I live very close to the Company. May I ask the driver of the vehicle assigned to my department to drop me off at my home at the end of the workday?

A. No. Vehicles may not be used for activities outside the Company, but only for the Company's events and business.

Q. Sometimes I use the email to send personal messages while I am at work. Is that all right?

A. The occasional use of email to send personal messages is acceptable. However, you should not have any expectation of privacy if you send an email using the Company's computers. You must also observe all the policies when you use the Company's equipment. You must never send aggressive or inappropriate messages, chains, personal publicity, political propaganda or commercial offers.



Nº 24 - INFORMATION MANAGEMENT

INova's business information is a high-value asset. To maximize this value, it is important that we all commit to holding, protecting and optimizing the Company' information.

- **Holding:** Nowadays, business-related disputes require you to manage your work information correctly. This includes organizing, protecting and preserving the content, as well as deleting information based on IEnova's Record Withholding Timetable.
- **Protecting:** The security and integrity of the Company's information are also important. Based on the foregoing, business information must be protected to make sure it

does not fall into the wrong hands and to help to ensure it remains reliable.

- **Optimizing:** Finally, but no less important, well-managed information increases IEnova's efficiency. You can contribute by ensuring that the correct information can be found easily and is available to the right people at the right time. This includes eliminating the information correctly when it is no longer needed by a legal holding order or beyond the holding requirements of records when no longer of use to the business.

When requested by the Legal Department, certain information may have to be kept, even if it has reached its expiration or destruction date in accordance with IEnova's Record Withholding Timetable. This may happen if the content is needed for a legal, governmental or internal investigation. Said request may be referred to as a "withholding order". The withholding orders and the related information may be found on IEnova's Record Management's SharePoint website.



QUESTIONS AND ANSWERS

Q. My supervisor has asked me to destroy documents related with a project that my department handled. Is this request appropriate?

A. The elimination of documents on the normal course of business is permissible if done in accordance with the Company's Information Management policies and no withholding order has been issued for said documents. If you have any doubts about whether these documents can be eliminated, you must check with the Document Control Manager, your unit's Records Coordinator or the Legal Department. You can also consult IEnova's Record Withholding Timetable on the Company's Record Management's SharePoint website.

If you think that the request could be incorrect, please contact the Legal Department or the Ethics Help Line.

N° 25 - RELATIONS WITH THE MEDIA AND SOCIAL NETWORKS

All IEnova companies must express themselves consistently and clearly to the communications media. In order to maintain these consistency, the Executive Vice-Presidency of Corporate Affairs and Human Capital is in charge of handling media relations. If your role does not specifically involve responding to the media or other external agents, you must refrain from making statements on behalf of the Company.

If you receive questions from the media or other external agents, instead of answering them yourself, you should refer them immediately to the department or person appointed by the Executive Vice-Presidency of Corporate Affairs and Human Capital in your area. Always remember that only the persons authorized to talk to the media should answer questions from journalists.

In order to maintain consistency in communications with financial analysts, the Executive Vice-Presidency of Finances, on behalf of the Investor Relations Department, is responsible for answering their questions about IEnova and its revenues. If you receive questions from financial analysts, instead of answering them yourself, you should refer or channel the financial analyst to the Investor Relations Department.

Publications on the Internet and posts on social media about IEnova or any of its companies are permitted, provided the guidelines below are followed. Social media communication include but are not limited to posts on social media websites (Facebook, LinkedIn, etc.), blogs, micro-blogs (Twitter, Instagram, etc.), multimedia websites (YouTube, etc.), Wikis or any other website on which any content can be published.

Official Company publications must be authorized by the Corporate Affairs and Human Capital, Legal, Finance, Accounting and/or the Investor Relations Departments. If an employee belongs to a professional organization related to your function in the position and that organization uses social media, said employee may participate in them subject to the approval of your supervisor.



Employees must use common sense in all the publications because they are responsible for the content of same and must bear in mind the impact that their posts may have on the Company. Please follow these guidelines:

- Do not share non-public information;
- Do not pose as someone else;
- If you are posting about the Company's products or services, clearly disclose your relationship with the Company and state that you are not representing the Company's point of view.
- If you identify yourself as an employee of IEnova or of any of its subsidiaries in any publication not endorsed by the Company, you must include the following liability legend: "The points of view expressed in this publication are my own and do not necessarily reflect the point of view of my Company".
- Do not publish anything that may be considered to be slanderous, threatening or an invasion of privacy, and;
- Do not make derogatory comments, use obscenities or bad language.



QUESTIONS AND ANSWERS

Q. I am working on an engineering project that will help our Company to improve its efficiency. I have a friend who is working on a similar project at another company. If my friend and I compare notes, we will find a better solution. I explain certain details of my project on my friend's Facebook page where we discuss certain challenges of the project. Is this wrong?

A. Yes. Although your project is still a work in progress, sharing it with your friend and on social media discloses the Company's confidential information and may put the Company at a disadvantage. You must delete that post immediately and inform your supervisor that you have disclosed confidential information.



Exhibit

ACKNOWLEDGMENT OF RECEIPT AND AGREEMENT

I have received a copy of the IEnova Code of Ethics, which I have read and I agree to comply with fully.

If I have any questions I will contact my Superior, the Corporate Ethics Department or the Human Capital Department to discuss it and obtain the correct interpretation.

I also agree to report any breach of the laws or of the Code of Ethics that may arise at work immediately.



Línea de Denuncia

Dirección de Ética Corporativa

integridad compromisos conducta
estado de derecho aprendizaje liderazgo
seguridad visión de futuro criterio
responsabilidad hábitos confianza
políticas visión desempeño apoyo
resultados **ética** respeto
sinceridad honestidad valores
principios socio responsable excelencia
cumplimiento equipo colaborar
diversidad pensamiento estratégico

01-800-062-2107

Línea de Denuncia





Línea de Denuncia

**Dirección de
Ética Corporativa**

01-800-062-2107

