

You are responsible for adhering to the most current version of this document. If printed, this information is dated material. Rely on electronic versions of documents located in the company's Policies site.



Anti-Bribery and Corruption Policy

Purpose

WEC Energy Group, and its subsidiaries (collectively referred to as the "Company" or "WEC Energy Group"), condemns and prohibits bribery and all other forms of corruption. All employees and members of WEC Energy Group's Board of Directors are expected at all times to operate ethically, honestly and with integrity, and to comply with all federal, state and local laws.

Terms and Definitions

"Bribe" or "kickback" means a payment, favor, or anything of value given dishonestly or illegally to secure or retain business, influence someone's behavior or encourage a particular outcome for the purpose of receiving a benefit, regardless of whether the benefit is personal or business in nature.

For purposes of the above definition, anything of value is broadly defined. It includes, but is not limited to:

- Cash, cash equivalents or other monetary payments
- Travel, gifts, meals and entertainment
- Anything for which the recipient does not pay at least the fair market value
- Loans
- Discounts not offered to the general public
- Offers of employment
- Benefits for a family member or other person, such as, employment, appointments, promotions, internships, or consulting engagements.
- Premium utility service not offered to the general public
- Payments to a charity or charities

Refer to the Gifts and Entertainment Policy for more information.

Typically, the following would not be included within the definitions of bribe or kickback:

- Food or refreshments of minimal value out of common courtesy provided during meetings hosted by the Company, provided such interaction complies with applicable gift ban or government ethics rules in the case of interactions with public officials.
- Requests from public officials to assist with routine items, such as, to assist constituents with customer service issues or to engage in routine public communications and advocacy.

Refer to the Government Relations Policy for more information.

Any questions about whether an interaction falls within the definitions of bribe, kickback or anything of value should be directed in advance to the [Compliance Officer](#).

Prohibited Conduct

WEC Energy Group prohibits bribery and all forms of public and private corruption. WEC Energy Group strictly prohibits the giving or receiving of bribes, kickbacks, and such other activities. This includes bribes or kickbacks made through an intermediary under circumstances indicating that such payments are made for an improper purpose or that a reasonable person would conclude are made for an improper purpose. This Policy applies to all employees and any other individuals authorized to engage in business on WEC Energy Group's behalf. This Policy applies to interactions in all business activities including those with public officials, current or potential vendors, contractors and candidates for employment. This Policy is to be broadly interpreted so as to prohibit all improper or illegal activities.

Violation of this Policy may result in disciplinary action, up to and including discharge. It could also result in civil lawsuits or criminal prosecution against you or the Company because of federal, state and local laws that prohibit these activities.

Reporting Violations

Violations can be reported to the Compliance Officer or anonymously through the EthicsLine. If you seek clarification or have any questions regarding the interpretation of any law or this Policy contact the [Compliance Officer](#). Our Non-retaliation Policy protects employees who report concerns in good faith.

- Confidential **EthicsLine** – available 24 hours a day, 7 days a week
 - 888-536-1499
 - www.wec.ethics.ethicspoint.com
- Compliance Officer
 - 414-221-3055
 - compliance-officer@wecenergygroup.com

Related resources

[Code of Business Conduct](#)

Corporate Approval Policy

Corporate Procurement Policy

Employee Selection Policy

Gifts and Entertainment Policy

[Government Relations Policy](#)

[Non-Retaliation Policy](#)