

# Code of Business Conduct

For WEC Energy Group Employees and  
Members of the Board of Directors



Confidential **EthicsLine** (available 24/7)

Phone – 888-536-1499

Web portal – [www.wec.ethics.ethicspoint.com](http://www.wec.ethics.ethicspoint.com)

Compliance Officer – 414-221-3055

[compliance-officer@wecenergygroup.com](mailto:compliance-officer@wecenergygroup.com)

*Ethics is everyone's business... Every day... Everywhere.*



WEC Energy Group is an energy industry leader, committed to delivering world-class reliability and the very best customer care. Our company is built on trust and integrity. Doing what's right for our customers, each other, and the general public is the key to our success. We count on you to conduct yourself with high ethical standards and with our core value of integrity.

Our Code of Business Conduct is a collection of guiding principles that sets the ethical standards for our company and assists in our decision-making to ensure we all choose the correct path. It is meant to be used by all of us in our day-to-day activities. We all strive to make the right choices every day, but an ethical dilemma can occur at any time. While the Code cannot address every situation, it does serve as an excellent starting point in making the right decisions.

All of us need to be familiar with the Code and comply with its provisions. All of us also are obligated to report suspected ethics violations and to seek advice in doubtful situations. You can do this through a number of avenues including your supervisor, confidential **EthicsLine**, the Compliance Officer, or Corporate Security. Regardless of the avenue you choose, WEC Energy Group offers an environment in which you can raise concerns without fear of retaliation.

The importance of ethics and integrity cannot be emphasized enough. Everything else we do as a company falls apart without both.

Thank you for your commitment to enhancing our ethical culture and making this a great place to work.

Sincerely,



A handwritten signature in black ink that reads "Allen R. Lovett".

President and  
Chief Executive Officer

## Our Values

Safety

Integrity

Reliability

Inclusion

Diversity

Customer focus

Sense of urgency

Financial discipline

Personal responsibility for results



A handwritten signature in black ink that reads "Joan M. Snaf".

Compliance Officer and  
Executive Vice President, Human Resources  
and Organizational Effectiveness

# WEC Energy Group

## Code of Business Conduct

*The Code of Business Conduct is an excellent starting point in making right decisions.*

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# WEC Energy Group

## Code of Business Conduct

### I. Ethical Standards

#### A. Applicability

This Code of Business Conduct covers WEC Energy Group and all of its subsidiaries. It applies to all employees and members of the Board of Directors of WEC Energy Group. The Code is a statement of policies for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.

As employees of WEC Energy Group, we are employed at-will except when we are covered by an express, written employment agreement. This means that you may choose to terminate your employment at any time, for any reason or for no reason at all. Similarly, WEC Energy Group may choose to terminate your employment at any time, for any legal reason or for no reason at all.

#### B. Compliance with Laws and Regulations

WEC Energy Group's policy is to comply with all applicable federal, state and local laws and regulations including environmental, health and safety, employment and antitrust laws. The Company is likewise committed to full and accurate financial disclosure in compliance with applicable laws, rules and regulations and to maintaining its books and records in accordance with applicable accounting policies, laws and rules and regulations. WEC Energy Group does not condone willful violations of the law, even if the person believes that such action is furthering the interests of WEC Energy Group. It also is against WEC Energy Group's policy for anyone in authority to knowingly order another person to violate the law. In cases where laws and regulations are ambiguous and difficult to interpret, legal advice should be obtained from the General Counsel of WEC Energy Group, or his/her designee, and followed accordingly.

*The Code of Business Conduct helps ensure we choose the right path.*

You have a responsibility for preserving the ethical standards of WEC Energy Group as you conduct your business affairs, even when laws or regulations are not involved. Thus in many instances, the policies referenced in this Code go beyond the requirements of the law. You are encouraged to raise concerns regarding ethical misconduct or illegal actions. WEC Energy Group prohibits retaliation against employees who report questionable ethical conduct in good faith.

*Additional resources:*

Equal Employment Opportunity Policy

Non-Retaliation Policy

Safety and Health Policy

#### C. Compliance Officer

The WEC Energy Group Compliance Officer will oversee the program established to achieve compliance with WEC Energy Group's ethical standards. The Compliance Officer may designate an officer to act in his/her stead. In this capacity, the Compliance Officer, along

with employees from other departments, will develop, operate, and periodically improve the Ethics and Compliance Program.

*Additional resources:*

Ethics and Compliance Resource Center (intranet site)

*The Code of Business Conduct addresses conflicts of interest, protection of information, use of assets and ethical conduct.*

## **D. Conflicts of Interest**

A conflict of interest occurs when your private interests interfere in any way, or even appear to interfere, with the interests of the company as a whole. You shall not participate in any activities (philanthropic, professional or community organizations, etc.) that could pose a conflict of interest in discharging your assigned responsibilities or that have a negative effect on WEC Energy Group. You must ensure your participation does not imply the company's endorsement or sponsorship. An employee's responsibility is to the company, and commitment to ethical behavior and legal compliance must come first. Any person who is uncertain whether a conflict exists should discuss the matter with his/her supervisor or with the Compliance Officer.

A conflict situation can arise when you take actions or have interests that make it difficult for you to perform your Company work or duties objectively and effectively. Although it is impossible to list every circumstance that could be considered a conflict of interest, the following guidelines cover some potential conflicts or questions concerning your personal integrity and the ethical discharge of your responsibilities to WEC Energy Group.

### **a. Outside Financial Interests or Business Relationships**

Unless specifically authorized by the Compliance Officer, neither you nor any of your immediate family members may have a financial interest in or business relationship with any company, individual, or other concern (including outside managerial and consulting services) doing business with WEC Energy Group or any of its subsidiaries if it might influence your decision or actions in performing WEC Energy Group duties because of potential personal financial gain. The Compliance Officer must obtain the approval of the Audit and Oversight Committee Chair before executive officers and members of the Board participate in any such arrangement.

### **b. Business Arrangements with WEC Energy Group**

Without prior written approval from the Compliance Officer of WEC Energy Group, you may not participate in a joint venture, partnership or other business relationship with WEC Energy Group or any of its subsidiaries. The Compliance Officer must obtain the approval of the Audit and Oversight Committee Chair before executive officers and members of the Board participate in any such arrangement.

### **c. Outside Employment (including self-employment, consulting services, etc.)**

You shall not engage in any personal enterprise or paid outside employment that might:

- (a) affect the objectivity or independence of your judgment or conduct in completing your duties and responsibilities to WEC Energy Group,
- (b) compete with WEC Energy Group for the provision of any services or goods in the marketplace,

- (c) embarrass or discredit WEC Energy Group,
- (d) conflict with the best interests of WEC Energy Group, or
- (e) conflict with scheduled hours, overtime hours when required, or the satisfactory performance of WEC Energy Group assignments.

Persons having access to private WEC Energy Group information shall not engage in any outside employment that might involve the use of such information. The primary loyalty and interest of all persons regarding their employment must remain with WEC Energy Group at all times. It is your responsibility to consult with the Compliance Officer to determine whether a planned activity will violate this provision.

*Additional resources:*

Information Security Policy

#### **d. Outside Director or Officer Positions**

The following approvals must be obtained before accepting outside director or officer positions:

- (a) Employees may not serve as an officer or member of the Board of any substantial outside for-profit organization without written permission from the Chief Executive Officer.
- (b) The Chief Executive Officer must obtain the prior approval of the Audit and Oversight Committee Chair before executive officers may serve in such a position.
- (c) The Chief Executive Officer must obtain approval of the Board before serving in such a position.
- (d) Members of the WEC Energy Group Board of Directors shall notify the Compliance Officer before serving in such a position. The Compliance Officer will determine if there are any conflicts of interest or issues with regard to regulatory compliance and then provide information to the Board's Corporate Governance Committee for review and approval or disapproval.

The preceding paragraph is not intended to prohibit the acceptance of an officer or director position with religious, charitable, civic, social or other non-profit organizations. If such a position will interfere with the performance of your duties or responsibilities owed to WEC Energy Group, you must obtain the approval of your supervisor and the Compliance Officer, before accepting the position.

- (a) The Compliance Officer must obtain the prior approval of the Chief Executive Officer before executive officers may accept a position with a substantial non-profit organization.
- (b) No prior approval is required for members of the WEC Energy Group Board of Directors to join a non-profit organization; however, the member of the Board shall notify the Compliance Officer about joining the non-profit organization.

#### **e. Gifts and Entertainment**

You should avoid any situation that has a potential to create the impression that some form of personal gain has affected WEC Energy Group's business judgment. You may not give anything of value to any customer or potential customer as an inducement to obtain business or favorable treatment. However, minor items of nominal intrinsic value may be provided to customers as long as they are given solely to create goodwill and are not intended to influence judgment or create a feeling of obligation.

*Our corporate reputation is built on trust and integrity.*

Neither you nor any member of your family, may accept anything of value from any present or potential supplier, financial organization, customer, or other organizations or individuals as an inducement to secure business or favorable treatment. However, accepting meals or other minor favors that are provided solely to create goodwill and are not intended to influence judgment or create a feeling of obligation is not considered to be a conflict of interest, provided the frequency of receipt of such gratuities is not excessive. Under no circumstance may you accept cash or its equivalent, such as gift cards or gift certificates.

If you are uncertain about whether this section is applicable to a specific situation, you should talk to your supervisor or to the Compliance Officer for guidance or interpretation. If the Compliance Officer deems it appropriate, he or she will consult with the Audit and Oversight Committee Chair in situations involving executive officers and members of the Board.

*Additional resources:*

Gifts and Entertainment Policy

#### **f. Family Members Working in the Industry**

You may find yourself in a situation where your family member\* is a supplier, contractor or customer of WEC Energy Group or is employed by one. Such situations are not prohibited, but they call for extra sensitivity to security, confidentiality and conflicts of interest.

There are several factors to consider in assessing such a situation. Among them: the relationship between WEC Energy Group and the other company; the nature of your responsibilities owed to WEC Energy Group and those of the other person; and the access each of you has to your respective company's confidential information. Such a situation, however harmless it may appear to you, could raise suspicions among your associates that might affect your working relationships. The very appearance of a conflict of interest can create problems, regardless of the propriety of your behavior.

To remove any such doubts or suspicions, you must disclose your specific situation to the Compliance Officer to assess the nature and extent of any concern and how it can be resolved. If the Compliance Officer deems it appropriate, he or she will consult with the Audit and Oversight Committee Chair in situations involving executive officers and members of the Board.

You must (a) guard against inadvertently disclosing confidential information, (b) not to be involved in decisions on behalf of WEC Energy Group that involve the other company, (c) refrain from any work associated with the other company that involves approval of payment or approval of work orders, and (d) not engage in work associated with the other company that involves contract administration, including but not limited to negotiations, review of contract terms and conditions, change orders or other modifications to the contract and review/approval of invoices.

Further, no employee shall, while employed by the company, use his or her position, authority or influence to solicit employment with a supplier or contractor of WEC Energy Group for the employee, or for any other person.

\* Family members shall be defined as an employee's spouse, person with whom they are in a legally-recognized civil union or domestic partnership, children, parents, mother- or father-in-law, son-in-law, daughter-in-law, brother, sister, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, fiancée, fiancé, grandparents, grandchildren, stepparents, stepchildren, stepbrother, stepsister, half-brother and half-sister.

*Additional resources:*

Compliance Officer – 414-221-3055 or [compliance-officer@wecenergygroup.com](mailto:compliance-officer@wecenergygroup.com)

### **g. Corporate Opportunities**

As employees and members of the Board of Directors of WEC Energy Group, you owe a duty to WEC Energy Group to advance its legitimate interests when the opportunity arises. You may not take for yourself personal opportunities that are discovered through the use of corporate property, information or position or use corporate property, information or position for personal gain.

## **E. Corporate Information**

### **a. Trading in Company Securities**

If you acquire knowledge, either directly or indirectly, about the affairs of WEC Energy Group that is not publicly available and that could potentially influence the market price of the Company's securities or the securities of any other company with which WEC Energy Group has a direct relationship, or that might influence the judgment of a person to purchase or sell the securities of WEC Energy Group or other such company, you:

- (a) must not use such information as an opportunity for your or anyone else's personal gain;
- (b) must not disclose such information to persons outside WEC Energy Group, including family members or other personal or professional acquaintances, so that others can use such information as an opportunity for personal gain;
- (c) must only discuss such information with persons inside WEC Energy Group who need to know about it for corporate business purposes; and
- (d) must not trade in the Company's securities or in the securities of any other companies involved before such information is announced to the public and for a reasonable period of time thereafter.

The Company's stockholders and the investing public must be given time to receive the information and act upon it. Particular caution should be exercised concerning information about earnings, acquisitions or dispositions by the Company of securities or assets, or about negotiations regarding significant transactions with others. All non-public material information must be treated as confidential and proprietary to the Company. If you discover that material, non-public information has been disclosed, you must immediately report the disclosure to the Compliance Officer or General Counsel.

*Additional resources:*

Corporate Securities Trading Policy

Financial Communications Disclosure Policy

Information Security Policy

### **b. Confidential WEC Energy Group Information**

While WEC Energy Group encourages sharing its information with you, it is necessary to restrict access to certain WEC Energy Group information for competitive and other reasons. It is your responsibility to protect WEC Energy Group information (WEC Energy Group's business information not generally available to the public) from any unauthorized use. You shall not obtain access to or use any sensitive WEC Energy Group information for any purpose other than the performance of your assigned duties. Sensitive information is that which may concern customers, stockholders, employees, vendors, or the competitive position of WEC Energy Group, and may be in written, electronic, or other form.



To preserve confidentiality, disclosure and discussion of sensitive WEC Energy Group information should be limited to persons who have a need to know the information. Such information shall not be made available to any other person (including another employee of WEC Energy Group), firm or agency (whether public or private) except in the specific circumstances and form as allowed by the appropriate WEC Energy Group officer, business unit or department head, General Counsel or Compliance Officer.

Adherence to this rule does not, however, relieve you from the duty to report to senior management on any matter that may be considered sensitive in preserving WEC Energy Group's integrity or reputation. Likewise, there shall be no concealment of information from members of the WEC Energy Group Board of Directors, internal auditors, General Counsel or independent auditors. In order to prevent inappropriate disclosures, only authorized persons may respond to information requests from outside sources or the news media. You should refer all inquiries from outside sources to your supervisor as appropriate. All news media requests should be referred to the media specialists in Corporate Communications.

*Excellent  
customer service  
is based on trust.*

Your obligation to treat information as confidential does not end when you leave WEC Energy Group. Upon discharge of your services as an employee or member of the Board of Directors of WEC Energy Group, you must return everything that belongs to WEC Energy Group, including all documents and other materials containing WEC Energy Group and customer confidential information. You must not disclose confidential information to a new employer or to others after ceasing to be an employee or member of the Board of Directors of WEC Energy Group.

You may not disclose your previous employer's confidential information to WEC Energy Group. Of course, you may use general skills and knowledge acquired during your previous employment.

*Additional resources:*

External Communications Policy  
Information Security Policy  
Records and Information Management Policy  
Use of Customer Information  
Use of We Energies Employee Information  
MERC Customer-Related Data Addendum

## **F. Fair Dealing**

WEC Energy Group depends on its reputation for quality, service and integrity. The way we interact with our customers, stockholders, suppliers and the public molds our reputation, builds long-term trust and ultimately determines our success. You should endeavor to interact fairly with WEC Energy Group's customers, suppliers and employees. We must never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair practices.

*Additional resources:*

Corporate Procurement Policy

## **G. Control and Use of Assets**

You are responsible for protecting WEC Energy Group assets entrusted to your care or for use in performing your job. WEC Energy Group's assets are not to be sold, loaned, borrowed, or otherwise disposed of, regardless of condition or value, except with proper authorization.

No payment on behalf of WEC Energy Group for services, materials, personal expenses, etc., shall be requested or approved, except for a legitimate purpose and amount described in the supporting documents. Management is responsible for establishing and maintaining internal controls to safeguard WEC Energy Group assets against loss from unauthorized use or disposition and for ensuring that transactions are legitimate and accurately reflected in WEC Energy Group's financial records.

The company provides its employees with access to electronic communication and systems tools to facilitate business communication and enhance productivity. Use of these systems is a privilege, which can be lost through user abuse or unacceptable use. Employees are expected to use good judgment and common sense when using company systems.

*Additional resources:*

Acceptable Use for Corporate Electronic and Telecommunications Resources Policy

## **H. Financial Records**

It is WEC Energy Group's policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports and documents filed with, or submitted to, the Securities and Exchange Commission and in all other public communications made by WEC Energy Group and to maintaining its books and records in accordance with applicable accounting policies, laws, rules and regulations. Accordingly, compliance is required with accounting treatment prescribed by applicable regulatory agencies, as well as generally accepted accounting principles and established WEC Energy Group accounting policies, procedures and controls. You shall fully and truthfully report financial, operating and other business data and information to accurately and fairly reflect transactions and dispositions of WEC Energy Group's assets. No undisclosed or unrecorded fund or asset shall be established for any purpose, nor shall any false or artificial entries be made in WEC Energy Group's books and records. Furthermore, you shall not conceal, withhold or misrepresent information that is requested by members of the WEC Energy Group Board of Directors, Company officers, internal auditors, independent auditors, regulatory bodies or any other person authorized to receive the information.

*Additional resources:*

Financial Communications Disclosure Policy

Internal Control Policy Statement

*Each of us must  
be familiar with the  
Code and comply  
with its provisions.*

## **I. Political Contributions**

WEC Energy Group highly regards the American political process and encourages the active support and participation in activities of the political parties and candidates of your choice, so long as such support and activities do not interfere with your effective performance on the job.

Employees and directors may not make any contribution of WEC Energy Group funds, property or services to any political party committee, or to any candidate for or holder of any public office without review for legal compliance and approval by WEC Energy Group's General Counsel. No direct or indirect pressure will be applied to you to make political contributions or participate in the support of a political party or the political candidacy of any individual.

WEC Energy Group, however, may sponsor and support one or more political action committees in accordance with applicable laws and regulations, and the members of such committees may solicit and receive voluntary contributions from you to encourage better

government by supporting the nomination and the election of qualified candidates to elective public offices. WEC Energy Group also may sponsor a political action conduit as authorized by state law to enable you to make contributions directly to candidates you desire to support.

In accordance with our Acceptable Use Policy, it is a violation of company policy to use email to convey partisan political content, including an endorsement or recommendation (either explicitly or implicitly) that employees should vote for a particular candidate.

*Additional resources:*

Acceptable Use for Corporate Electronic and Telecommunications Resources Policy  
Corporate Political Contributions and Reporting Policy

## **J. Corporate Hospitality to Public Officials**

Hospitality toward public officials shall avoid compromising the integrity or reputation of such individuals or WEC Energy Group. Neither WEC Energy Group nor you shall furnish any officer or public employee, or any candidate or elected official, with lodging, transportation, food, meals, beverages or other item of monetary value not provided to the general public in violation of state or federal law. To the extent applicable local, state, or federal law provides for limited hospitality to public officials, such rules shall be strictly followed.

## **K. Work Environment**

WEC Energy Group is committed to providing a work environment that respects the dignity of each employee within its diverse work force. Harassment or discrimination will not be tolerated and could result in severe disciplinary action. WEC Energy Group does not permit discrimination based on sex, age, race, color, creed, religion, disability, marital status, sexual orientation, gender identity, genetic information, national origin, ancestry, citizenship, pregnancy, military status, veteran status, or other status protected by applicable state law. WEC Energy Group will be nondiscriminatory in hiring, terminating, and promoting employees, and in all other employment matters.

*Each of us is  
obligated to  
report violations  
and seek advice  
when in doubt.*

WEC Energy Group is committed to providing a work environment that is free from alcohol and other drug use. If you are determined to be using, possessing, distributing, selling or under the influence of alcohol or any illegal drug during the span of any working period, or while on WEC Energy Group property, you will be subject to severe disciplinary action, including potential discharge. However, WEC Energy Group may permit the use, possession and/or distribution of alcoholic beverages during non-working hours at formally planned business, recreational or social events at a designated location on WEC Energy Group property with the prior written authorization of the management representative responsible for the facility.

It is the responsibility of the company to maintain a reliable workforce, composed of individuals who take pride in their work performance and who dependably attend work. It is required that all employees attend work as scheduled. Regular attendance is a basic job requirement and a condition of employment. Employees have personal responsibility for ensuring time sheets and account allocations of reported time are properly recorded.

*Additional resources:*

Alcohol and Other Drug Use Policy  
Anti-Harassment and Sexual Harassment Policy  
Attendance and Time Reporting Policy  
Equal Employment Opportunity Policy  
Violence in the Workplace Policy

## L. Communications with Management, Board of Directors, Auditors and Others

All business communications will be truthful and free from false or exaggerated claims. This includes news releases, advertisements, sales promotion materials, and other communications prepared for external use. Senior management and the Board of Directors must remain fully informed on sensitive matters, even when it might appear that less candor is desirable to protect WEC Energy Group or the image of senior management. Therefore, there shall be no concealment of information from members of the WEC Energy Group Board of Directors, senior management, internal auditors, General Counsel, or independent auditors. Ordinarily, auditors from regulatory and taxing authorities and counsel for underwriters are entitled to and shall receive such requested information. Unusual requests, however, are to be referred to the Compliance Officer, Corporate Secretary or to WEC Energy Group's General Counsel.

*Additional resources:*

External Communications Policy

Financial Communications Disclosure Policy

## II. Compliance Program

### A. Administration

Each officer and department head is ultimately responsible for ensuring that all persons within his/her area of responsibility understand the ethical standards that may affect them. As described in Section I (C), the WEC Energy Group Compliance Officer, or designee when unavailable, will oversee the program established to achieve compliance with WEC Energy Group's ethical standards.

### B. Acknowledgment Reporting

Employees and members of the Board of Directors shall periodically be required to submit a statement to the Compliance Officer, which shall affirm the knowledge and understanding of and compliance with the requirements of this Code of Business Conduct. Managers and supervisors are responsible for ensuring that all employees under their jurisdiction are aware of and comply with WEC Energy Group's Code of Business Conduct. Employees are required to complete an annual certification course that highlights the expectations of the Code of Business Conduct and other key corporate policies.

### C. Reporting Ethical Violations

WEC Energy Group is committed to maintaining a work environment that encourages employees to raise concerns and is committed to promptly addressing employee compliance concerns. If you discover a suspected violation of the ethical standards of WEC Energy Group, you should immediately report it to the Compliance Officer at 414-221-3055. The identity of all persons reporting possible violations will be kept confidential to the extent reasonably possible. As an alternative to contacting the Compliance Officer, WEC Energy Group has established the **EthicsLine** 888-536-1499 or the web portal - [www.wec.ethics.ethicspoint.com](http://www.wec.ethics.ethicspoint.com), as the mechanism to receive anonymous complaints.

*WEC Energy Group prohibits retaliation against employees who report questionable ethical conduct.*

***Retaliation will not be permitted against any person for reporting violations in good faith.***

Employees who feel that they have experienced any form of retaliation due to the reporting of questionable ethical situations or conduct should notify the Compliance Officer immediately. Any employee found to be engaging in any retaliatory activity is subject to disciplinary action, up to and including immediate discharge.

Discovery of events believed to be of a significant questionable, fraudulent or illegal nature, including issues relating to the accuracy or completeness of the Company's public financial reports or the accuracy of its internal controls or auditing matters must be reported by the Compliance Officer to the WEC Energy Group General Counsel, the Chief Executive Officer, the Chair of the Audit and Oversight Committee of the WEC Energy Group Board of Directors, and the Company's internal and independent auditors.

*Additional resources:*

Non-Retaliation Policy

## **D. Interpretations of Ethical Standards**

In the course of doing business, situations may occur that do not appear to be clearly right or wrong, or circumstances may arise that do not appear to be covered by the previously stated standards. In such cases, requests for interpretations or clarification of this Code of Business Conduct should be submitted to the Compliance Officer.

## **E. Disciplinary Action**

Employees who violate the Code of Business Conduct will be subject to disciplinary action, up to and including immediate discharge.

## **F. Waiver of the Code**

The Company will waive application of the policies set forth in this Code only where the circumstances warrant granting a waiver, and then only in conjunction with any appropriate monitoring of the particular situation. Waivers of the Code for directors and executive officers may be made only by the Board of Directors as a whole or the Audit and Oversight Committee and must be promptly disclosed as required by law or regulation.

## **G. No Rights Created**

This Code of Business Conduct is a statement of the fundamental principles and key policies and procedures that govern the conduct of WEC's business. It is not intended to and does not create any rights in any employee, client, supplier, competitor, stockholder or any other person or entity.

# **III. Conflicts with Other Policies**

In the event that any policy expressed in this Code of Business Conduct conflicts with any other policy issued by WEC Energy Group, the policy expressed herein shall take precedence.

Electronic versions of related policies are located on the policies page of the company intranet site. You may also request copies from the Compliance Officer.

Training on the Code of Business Conduct is available via e-learning; contact the Compliance Officer for access.

## WEC Energy Group Code of Business Conduct

Responsibility: Compliance Officer

Revised: October 18, 2012      May 5, 2005  
December 4, 2008      September 10, 2003  
October 18, 2007      July 11, 2003

Approved: Board of Directors

Contact: Joan M. Shafer, Compliance Officer  
414-221-3055    compliance-officer@wecenergygroup.com  
Confidential **EthicsLine** (available 24/7)  
Phone – 888-536-1499  
Web portal – www.wec.ethics.ethicspoint.com

### *Additional resources:*

Non-Retaliation Policy      Ethical Action Test  
Top 10 Things to Remember      Ethics Self-Assessment  
Frequently Asked Questions      Common Rationalizations  
Ethics Decision Tree      EthicsLine Materials  
Report an Ethics Concern

