



# OUR CODE OF BUSINESS CONDUCT



*Energized by Our Values*

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## A Letter to All Employees from the President and CEO, Lloyd Yates

To the NiSource team,

At NiSource, embedding ethical values in our organizational culture is essential to our success and plays a critical role in our mission to deliver safe, reliable energy that drives value to our customers.

As employees and leaders in the communities we serve, we set the example. It is our responsibility to act as ethical stewards, fostering an environment of respect, dignity and compassion. Together, we create a culture where every individual has an equal opportunity to contribute to our shared growth and success.

It is our duty to know, understand and comply with our Code of Business Conduct. Built upon our core values — Be Safe, Look for a Better Way, Act with Care and Take Accountability — the NiSource Code of Business Conduct serves as a personal guide.

We are OneNiSource, which means each of us has a shared commitment to act in the best interest of the larger organization. Ethical decision-making and appropriate behavior are always expected. Our adherence to the Code must remain steadfast, and it is our individual responsibility to remain informed and operate in accordance with our NiSource ethical business standards and policies. Doing so ensures we can perform our jobs safely, responsibly and with integrity.

Our commitment to our customers, employees and communities is central to everything we do and remains the driving force of this company. Thank you for continuing to uphold our core values and fostering a culture of safety, respect, continuous improvement, care and accountability. Together, we ensure NiSource remains a trusted leader in our industry.

Sincerely,  
**LLOYD YATES**

# Our Core Values and Business Conduct Principles

At NiSource, our core values guide everything we do, and our [NiSource Executive Leadership team](#) is critical to driving forward our values-based culture that helps us innovate together in service to our mission. Our values keep us focused on serving our communities safely, ethically and responsibly. By living these values, we earn trust and build strong relationships with each other, our customers, our partners and our communities.



## ▶ BE SAFE.

Safety is always first. We each play a role in creating a safe place to work and serve. This means following safety rules, speaking up about risks and looking out for each other.



## ▶ LOOK FOR A BETTER WAY.

We're always looking to improve. Finding smarter, safer ways to work helps us deliver more value to our customers. By staying open to change, we create a stronger future for NiSource.



## ▶ ACT WITH CARE.

We show care in all we do. Acting with respect and integrity means listening to each other, keeping our commitments and building trust with customers and communities.



## ▶ TAKE ACCOUNTABILITY.

We own our actions and results. Accountability means doing what we say, following through on our commitments and always aiming to do the right thing. These values are at the heart of our Code of Business Conduct. They guide our actions, help us support each other and show the world what NiSource stands for. By living our values every day, we protect NiSource's reputation and make a positive impact on our communities.



## Taking Charge Responsibly

Our Code of Business Conduct is the foundation of our commitment to act with integrity, respect others and make decisions that reflect our values. We each have a shared responsibility to know the Code and use it daily. Every one of us — employees, officers, directors, independent contractors and consultants — helps protect NiSource's reputation and build trust with our customers, partners and communities.

We do this by following all applicable laws, regulations, company policies and procedures; doing our best work at all times; professionally presenting ourselves; and being actively present. We expect the third parties that we work with to follow similar principles, including our suppliers, agents, business partners and contractors. This ensures NiSource's continued success, excellence and integrity.

### **IN THIS SECTION:**

- Using Our Code of Business Conduct
- Our Responsibilities
- Complying with Laws and Regulations
- Making the Right Decision
- Ethics and Compliance at NiSource

# Using Our Code of Business Conduct



Taking Charge  
Responsibly



## **OUR CODE IS HERE TO GUIDE US**

Our Code of Business Conduct helps us make ethical decisions and follow NiSource's values. It provides clear expectations for how we do our work, treat others and make responsible choices. While the Code can't cover every situation, it gives us a foundation to rely on whenever we need support.

The Code applies to everyone who works for or with NiSource, including employees, officers, directors, independent contractors and consultants, as well as to our subsidiaries and affiliates. We expect everyone to read, understand and follow the Code, along with the related policies and guidelines that support it. Every action we take reflects our commitment to acting with integrity.

## **NO CONTRACT OF EMPLOYMENT**

This Code sets standards for behavior at NiSource but does not create a contract of employment. NiSource may modify policies in this Code or within the Ethics Program at any time. Unless covered by a collective bargaining agreement or written contract signed by an officer of the Company, employment is "at will." This means either you or NiSource may end the employment relationship at any time without cause or notice.

# Our Responsibilities



Taking Charge  
Responsibly



Each of us has a duty to know, understand and follow the Code. This includes:

- Acting in line with NiSource's values
- Reporting concerns or potential violations
- Seeking help if something doesn't seem right
- Staying informed about laws and policies that affect our work

Following the Code builds trust with our customers, partners, coworkers and communities. This trust is essential to our mission and reputation. When we use the Code as a guide, we help make NiSource a place where everyone feels valued, empowered and respected.

## WAIVERS

In rare cases, NiSource may grant a waiver of certain parts of the Code. Any waiver of our Code for any of our directors, Section 16 officers or executive officers may be made only by the Audit Committee of the NiSource Board of Directors and must be promptly disclosed, along with the reasons for the waiver, when and as required by applicable law and regulations. For other employees, waivers must come from NiSource's General Counsel. Any waiver is taken seriously and is granted only when absolutely necessary.

## RESPONSIBILITIES OF MANAGERS

Managers have added responsibilities under the Code. They set the example for others by leading with integrity, showing respect and prioritizing ethics in decision-making. As a manager, you should:

- Foster a positive, ethical work culture
- Make sure your team understands the Code
- Encourage open communication and support employees who raise concerns
- Address issues or potential violations promptly and fairly
- Stand firmly against any form of intimidation, retaliation or violation of human rights

By living these values, managers help us create a workplace where everyone feels supported in making ethical choices. Together, we all play a part in building a company we can be proud of.

# Complying with Laws and Regulations



Taking Charge  
Responsibly



We are committed to following all laws, regulations and internal policies that apply to our work. Whether it's a local, state or federal law, compliance is essential to protecting our Company, our communities and ourselves.

If you are unsure about a law or regulation that applies to your job, don't hesitate to ask for help. You can reach out to your manager, the Legal Department, Human Resources or the Ethics or the Compliance Departments. Understanding the rules that affect our work helps us act responsibly and avoid risks.

We take compliance seriously. Violating laws or regulations could result in serious consequences for NiSource and for the individuals involved. Each of us plays a part in protecting NiSource's reputation by acting legally and responsibly every day.

# Making the Right Decision



Taking Charge  
Responsibly



Using sound judgment is essential in everything we do at NiSource. When you face a challenging decision, consider the following questions to help you make the best choice:



If you answer no or are unsure about any of these questions, pause and seek guidance. We're all responsible for making decisions that keep NiSource strong, trusted and respected.

# Ethics and Compliance at NiSource



Taking Charge  
Responsibly



## WE ARE COMMITTED TO INTEGRITY AND RESPONSIBLE ACTION

Our Ethics and Compliance Programs help us follow our Code, laws, standards and policies; make ethical decisions; and find answers when questions arise. These programs provide the resources, training and support needed to uphold NiSource’s commitment to integrity and following the law.

The Corporate Ethics Department is here to guide and support us. It offers training on the Code, answers questions about ethical issues and provides resources to help us act responsibly. If you have questions or need advice, email [Ethics@nsource.com](mailto:Ethics@nsource.com).

The Centralized Compliance Department provides a single line of sight into all compliance activities at NiSource. It oversees the Compliance and Policy Committees.

Our Ethics and Compliance Departments:

- promote an “open door” culture
- support safety throughout our operations
- encourage speaking up
- support ethical business practices, legal compliance and sound decision-making

## RESOURCES

The NiSource Ethics Program includes several resources to support our values and guide our decisions:

- **Company policies in MySource Policy Center:** Standards that govern our business practices
- **Standards, practices and procedures:** Rules and guidelines for specific teams or roles, such as the FERC Standards of Conduct
- **Ethics training:** Regular training to help employees understand and follow the Code
- **Ethics resources on MySource:** The Ethics site and articles on MySource offer guidance on ethical issues
- **Public information:** The NiSource website provides information on our ethics and compliance efforts
- **NiSource’s Administration of the Ethics Program Policy**



**Staying Grounded  
with Solid Judgment**



## Staying Grounded with Solid Judgment

Making sound decisions is key to maintaining trust and upholding our values. We rely on everyone to think clearly, act responsibly and seek help when needed. We do this by knowing and consistently following company policies, standards and procedures. If unclear, ask your supervisor for guidance or clarification from the resources in the Speaking Up and Seeking Help section below. This section covers how to speak up and report issues, what happens after a report is made, our zero-tolerance stance on retaliation and the consequences of noncompliance. Whether reporting a concern, understanding what to expect during an investigation or knowing that retaliation will not be tolerated, using solid judgment helps us protect our ethical culture and keep our workplace strong.

### **IN THIS SECTION:**

- Speaking Up and Seeking Help
- What Happens When I Report an Issue?
- Zero Tolerance for Retaliation
- Consequences of Noncompliance

# Speaking Up and Seeking Help

We are committed to fostering a culture where everyone feels safe to raise concerns and seek guidance. If you see or suspect a violation of our Code, or if you have a question about a situation, it's important to speak up. By reporting issues or seeking help, you play an essential role in protecting NiSource's values and maintaining an ethical workplace.

If you're unsure whether an action or conduct complies with this Code or a policy, ask your supervisor for guidance or clarification first. If your concern requires further action, we can help you identify the team that best matches your needs. Unsure of where to turn, refer to our employee resource guide, on the MySource Employee Relations site.



## HOW TO REPORT

Once you have found the best resource to address your concern, you have several options for reporting or asking for advice:

- **Talk to your supervisor**
- **Contact Human Resources:** OneHR@NiSource.com, 1-888-640-3320
- **Reach out to the Corporate Ethics Department by:**
  - **Phone:** 219-647-4231
  - **Email:** Ethics@NiSource.com
  - **Postal address:** NiSource, Attn: Corporate Ethics Department, 801 E. 86th Ave., Merrillville, Indiana 46410
  - **Call the NiSource Ethics Hotline** at 1-800-457-2814. The hotline is available 24/7 through an independent third party, and you may choose to remain anonymous.
- **Report online** through our confidential third-party reporting website at [nisource.ethicspoint.com](https://nisource.ethicspoint.com), where you may choose to remain anonymous.

## CONFIDENTIALITY AND ANONYMITY

NiSource takes all reports seriously and handles them with confidentiality and care. If you prefer to stay anonymous, you can do so by reporting through the NiSource Ethics Hotline or the online third-party reporting website. Identifying yourself, however, can make it easier for us to follow up with questions or provide updates as we address the issue. Your identity will only be shared with those who need to know it to address the issue.



**Staying Grounded  
with Solid Judgment**

# What Happens When I Report an Issue?

We take every report seriously. Here's what you can expect when you report:

- **Intake:** Your report goes through the channel you choose: a manager, HR, the Corporate Ethics Department or the anonymous NiSource Ethics Hotline. We document and review each report carefully.
- **Investigation:** If needed, our Corporate Ethics Department or another group will investigate. They will keep it as private as possible and only involve people who need to know. You must cooperate fully if asked to take part as the reporter, a witness or the subject of an investigation.
- **Resolution:** We work to resolve issues fairly. All actions taken are based on findings and ensure we uphold our values.
- **Follow-up:** While details are usually confidential, you'll be told that your report has been reviewed and that the appropriate actions have been taken.



## Our hotline

Managed by Navex Global, our hotline is available 24/7/365. When you call, a third-party specialist will guide you through the reporting process, where you can choose to remain anonymous. Calls are not recorded or traced. After you report, you'll receive a report key and password so you can follow up or check the status of your concern.

## » HOW OUR VALUES ENERGIZE US

- Investigation Procedure for Code of Business Conduct Violations



Staying Grounded  
with Solid Judgment

# Zero Tolerance for Retaliation

## WE SPEAK UP AND PROTECT EACH OTHER

We're committed to a workplace where everyone feels safe to raise concerns. We have zero tolerance for retaliation against anyone who reports a concern in good faith. Reporting concerns — about possible Code violations, legal issues or policy matters — is part of building a culture of integrity. Good faith means you honestly believe what you're reporting, even if it turns out you're wrong about the facts or that a violation took place.



Staying Grounded  
with Solid Judgment



## WHY IT'S IMPORTANT

Retaliation doesn't just hurt the person who reported: It harms the whole team by creating fear and discouraging openness. Protecting those who speak up ensures that everyone feels safe and respected at work. When we address concerns fairly, we help maintain trust and keep our workplace strong.

## OUR VALUES IN ACTION

- Report concerns in good faith and without fear of retaliation.
- Respect those who raise concerns — whether you agree with them or not.
- Know that NiSource will investigate all reports of retaliation.
- Take comfort in knowing that action will be taken to ensure a safe workplace.

### Examples of retaliation when done as a consequence for reporting or participating in the investigative process:

- Reducing work hours or responsibilities without a valid reason
- Terminating or demoting someone who raised a concern
- Excluding someone from team activities or meetings
- Creating a hostile or uncomfortable work environment
- Giving unfair performance reviews

## » HOW OUR VALUES ENERGIZE US

- Non-Retaliation Policy

# Consequences of Noncompliance

## WE ARE ALL ACCOUNTABLE

Everyone at NiSource has a duty to know and follow our Code, as well as all relevant laws, regulations and policies. NiSource requires all employees to complete Code training. Violating the Code or other Company policies can lead to disciplinary action, up to and including termination. If the violation also breaks the law, it could lead to fines or jail time. It is important to remember that at NiSource, acts of misconduct are taken seriously, and anyone who violates our Code may be subject to not only internal action but legal action, depending on the situation.



### Examples of noncompliance consequences:

- Safety incidents
- Fines or legal penalties for breaking the law
- Loss of trust with customers and partners
- Brand damage that can impact our success
- Disciplinary action, up to termination



### ENERGIZE YOUR UNDERSTANDING

**Q:** I missed a required Code training because I was busy. I'm not sure if it matters since I know the Code well. Do I need to make it up?

**A:** Yes, completing all required training is essential. Even if you feel familiar with the Code, each training session may include new or updated information. By completing your training, you ensure you're fully informed and demonstrate your commitment to upholding our standards.

## WHY IT MATTERS

Following the Code and the law protects NiSource's reputation and strengthens trust with our customers, partners and investors. Compliance also helps us avoid costly fines and legal risks. Noncompliance can harm our brand, damage trust and lead to financial penalties. By following our Code, we all help build a strong, ethical workplace that benefits everyone.

## OUR VALUES IN ACTION

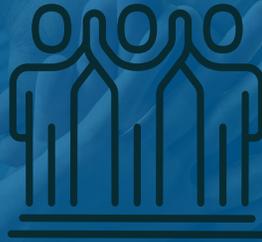
- Know and follow the Code, policies and relevant laws.
- Complete all required Code training.
- **Report** any concerns or potential Code violations.
- Make decisions that uphold NiSource's values and reputation.

## » HOW OUR VALUES ENERGIZE US

- Investigation Procedure for Code of Business Conduct Violations



Staying Grounded  
with Solid Judgment



## Powering Up a Positive Work Environment

We strive to foster a positive and respectful environment where everyone feels safe, included, respected and supported. Our focus is on welcoming different perspectives, treating everyone fairly, prioritizing safety and well-being and maintaining a secure workspace. We achieve this by using respectful language and demonstrating appropriate workplace behavior. By upholding these values, we create a space where everyone can thrive and contribute to NiSource's success.

### **IN THIS SECTION:**

Workplace Connection

Preventing Harassment and Discrimination

Keeping Our Workplaces Safe and Healthy

Providing Safe and High-Quality Services

Securing Our Workplace



Powering Up a Positive  
Work Environment

# Workplace Connection

For more than a century, our success has been powered by our people. Through hard work and dedication, our employees and partners have a shared goal of building a welcoming workplace where everyone feels respected and connected, while creating a future where we will be a premier, innovative and trusted energy partner as our industry's and customers' preferences evolve. Through Workplace Connection, we strive to cultivate an environment of mutual respect in which we accept and value the different perspectives of our customers, communities, workforce and suppliers.

## WHY IT'S IMPORTANT

We believe we have a dutiful obligation, both as a company and a member of the many communities that make up our operating regions, to ensure that we embrace the fundamental principles of Workplace Connection in all that we do, every step of the way. To achieve that goal, we will focus our efforts on four key pillars:

- **Talent Engagement:** Attracting top talent and creating development opportunities for our employees
- **Communities & Partnerships:** Maximizing the value of partnerships to do even more good in the communities we serve
- **People Experience:** Enhancing our workplace culture by creating more opportunities for collaboration, connection and recognition for our employees through

our Employee Resource Groups (ERGs) and other initiatives

- **Insights & Impact:** Holding ourselves accountable by using data-driven insights to track our progress toward our goals and adjust our approach as needed

In the communities that we serve, we strive to provide quality service while driving economic inclusion. Our community outreach efforts are focused on safety, economic and workforce development, environmental stewardship, STEM, energy education, basic needs and hardship assistance programs.

Our goal is to ensure that NiSource remains a place where people feel welcome. We create an environment where everyone thrives and helps drive innovation by ensuring that everyone has a voice and an active seat at the table.

## Flexible Work Arrangements

Flexible work arrangements help create an inclusive workplace by accommodating different needs, such as those related to disabilities, religious practices, family and military obligations and childbirth or lactation. These arrangements may include working remotely, varied schedules or other customized solutions that support the unique circumstances of each team member.



## ENERGIZE YOUR UNDERSTANDING

**Q:** We have a new teammate from another country who seems hesitant to share ideas in meetings. They may be having a difficult time adjusting to a new culture. How can I help them feel more comfortable and included?

**A:** Take the time to build a connection by learning about their background and inviting them into conversations. During meetings, create a welcoming environment by asking for their input directly and giving space for their perspective. Simple gestures, like inviting them to join team activities and showing openness to cultural differences, help make everyone feel they belong.



Powering Up a Positive  
Work Environment

# Preventing Harassment and Discrimination

We are committed to a workplace where everyone is treated with respect and fairness. Discrimination and harassment have no place at NiSource. These behaviors go against our values and harm the trust and cooperation that help us succeed.



## WHAT THIS MEANS

Discrimination and harassment are strictly prohibited at NiSource. Discrimination includes treating individuals differently or less favorably based on any protected characteristic. Harassment is a form of discrimination and is unwelcome conduct (verbal, physical or visual) based on protected characteristics that create a work environment that is intimidating, hostile or offensive.

## WHY IT'S IMPORTANT

A workplace free from discrimination and harassment helps everyone feel safe and valued. When we respect each other, we build a stronger team. This allows everyone to contribute their best, which benefits both our work and our culture. Upholding these values supports trust, collaboration and growth at NiSource. Employees are encouraged to inform the harasser directly that conduct is unwelcome and must stop and promptly report the conduct.



## ENERGIZE YOUR UNDERSTANDING

**Q:** I noticed a manager regularly using insulting remarks about an employee's ethnicity in front of the team. Could this be considered harassment?

**A:** Yes, repeated insulting remarks based on ethnicity can be a form of harassment. This behavior can intimidate and humiliate an employee, affecting their confidence and work performance. Report any suspected harassment to Human Resources, the Corporate Ethics Department or your manager. We investigate all reports and maintain confidentiality to protect everyone involved.

# Preventing Harassment and Discrimination

## TYPES OF PROHIBITED HARASSMENT

Harassment can be verbal, physical or visual. It includes unwelcome behaviors (targeting protected groups and/or status) such as:

- Offensive jokes, slurs, epithets or name-calling
- Inappropriate comments or gestures
- Intimidation, ridicule or mockery
- Sharing or displaying offensive objects, materials or pictures that humiliate individuals or groups
- Unwelcome physical contact, threats or advances
- Interference with work performance

Sexual harassment involves unwelcome advances, requests for favors or other conduct of a sexual nature. Examples include:

- Making sexual propositions or inappropriate comments
- Telling explicit jokes or using suggestive language
- Sharing sexually oriented materials or messages

## OUR VALUES IN ACTION

- **Show respect:** Be mindful of your words and actions.
- **Speak up:** **Report** any behavior that violates our policies — Silence can make these behaviors worse.
- **Support each other:** Help create a safe environment where everyone feels included and valued.



### Things to know about harassment

- **Where it can happen:** Harassment is not limited to the workplace. It can occur at after-hour events, during work travel, through social media or by stalking employees, customers or suppliers.
- **Effect matters, not intent:** Harassment is determined by its effect on someone, not by the intentions of the person doing it. Even if someone doesn't mean to offend, it can still be harassment if it makes someone feel uncomfortable or unsafe.

### » HOW OUR VALUES ENERGIZE US

- Employees with Disabilities Policy
- [Equal Employment Opportunity Policy](#)
- Prohibition Against Sexual and Other Harassment Policy



Powering Up a Positive  
Work Environment

# Keeping Our Workplaces Safe and Healthy

## WE PRIORITIZE SAFETY AND WELLNESS

At NiSource, we put the safety and health of our employees, customers and communities first. We are committed to maintaining a workplace that meets safety rules and regulations and keeps everyone safe and healthy. Possession, distribution or use of illegal drugs or alcohol on company premises or in vehicles is strictly prohibited. NiSource does not tolerate violence, threats of violence or bullying in any form against anyone.



### WHY IT'S IMPORTANT

Staying safe builds trust and supports everyone's well-being. By being alert and taking action, we protect each other and help NiSource stay strong. Safe and healthy workers make better decisions and contribute to a positive work environment.

### OUR VALUES IN ACTION

- Learn and follow the safety rules and policies for your job.
- Wear the right protective gear for tasks that need it.
- **Report** injuries, bullying or unsafe situations to your supervisor right away.
- Use Stop Work Authority when you see anyone at risk of getting hurt.
- Stay free from alcohol or drugs that could affect your work.

Reach out for help through the Employee Assistance Program or talk to your local Human Resources if you have a problem with drugs or alcohol.

### Well-being at work:

Safety includes mental health. Talk openly and support each other. If you feel stressed, reach out to a manager or a coworker or use the Employee Assistance Program. Your mental health matters to your success and our team.

### Stop Work Authority

**Stop Work Authority empowers you:** You have the right and duty to stop work if it seems unsafe. This allows you to prevent accidents and protect everyone. Trust your instincts — Taking action keeps everyone safe.

### » HOW OUR VALUES ENERGIZE US

- Alcohol and Illegal Drug-Free Workplace Policy
- Employee Assistance Program
- [Occupational Health and Safety Policy](#)
- Prohibition of Workplace Violence  
Firearms and Weapons
- Stop Work Authority Policy



### ENERGIZE YOUR UNDERSTANDING

**Q:** I saw a coworker using equipment that looked unsafe. Should I report this?

**A:** Yes, Speak Up immediately in the work setting and exercise Stop Work Authority. Reporting unsafe actions helps prevent injuries and keeps everyone safe. Using Stop Work Authority shows leadership and protects our team. If there is repeated or consistent unsafe behavior by a coworker or allowed by a supervisor, then after the actual Stop Work, file an official report.



Powering Up a Positive  
Work Environment

# Providing Safe and High-Quality Services

## WE ARE COMMITTED TO SAFETY AND EXCELLENCE

We take pride in providing safe and reliable energy services. This commitment extends to both natural gas and electric operations, ensuring our customers receive consistent and dependable energy solutions.



## WHY IT'S IMPORTANT

Safety and quality are essential to earning our customers' trust. By focusing on high standards, we protect the well-being of our customers, employees and communities. This helps us maintain our reputation and fulfill our promise of dependable service.

## OUR VALUES IN ACTION

- Follow all safety guidelines when handling and distributing energy products.
- Educate customers on safe energy practices, like reporting gas odors and preventing carbon monoxide buildup.
- Ensure thorough inspections and maintenance of energy systems to avoid service interruptions and safety issues.
- Communicate safety updates and tips to customers, especially before potential weather events.
- Partner with community programs to support energy efficiency and customer education.

## Customer safety outreach

We share important safety tips through emails, printed materials and our websites. Topics include how to report gas odors, manage carbon monoxide risks and prepare for weather events. Our goal is to keep our customers informed and safe.

## Call before you dig

The number one cause of pipeline damage is digging near underground facilities. Remind customers and partners to call 811 before starting any digging project. Our commitment to safe digging is part of our broader mission to protect the community and ensure reliable service.

# Securing Our Workplace

## WE MAINTAIN A SAFE AND SECURE ENVIRONMENT

We are committed to keeping our workplace secure. This includes strong physical security measures and effective crisis response plans. Everyone has a role in ensuring safety for themselves and others. Firearms or weapons are prohibited at all times on company property or at company functions, including any jobsite or in a vehicle.

## WHY IT'S IMPORTANT

A secure workplace protects employees, customers and partners. Preventing and responding to security issues helps keep everyone safe and operations running smoothly.



## OUR VALUES IN ACTION

- Follow building access rules and report suspicious activity.
- Always wear your NiSource ID where others can see it.
- Follow facility rules about visitors if you invite one to your workplace.
- Know emergency procedures and act quickly during a crisis.
- Treat violent or threatening behavior as emergencies.
- Do not bring weapons or explosives into company or personal vehicles used for work or onto company property unless contrary to state or local law or authorized by the Director of Corporate Security.
- Move to a safe place and call 911 during an emergency. Once safe, contact Corporate Security at the Security Operations Center (SOC): 1-866-218-0530.

## Workplace violence prevention

We strive for a workplace free from violence and abusive behavior. We do not tolerate threats, horseplay, physical aggression or bullying. Everyone is responsible for keeping the workplace respectful and safe. This includes reporting conduct that contributes to violence, threats or abuse. Interfering, intimidating or refusing to cooperate with supervisors or coworkers in the performance of their duties is prohibited.

## Bullying

Bullying includes repeated behavior that hurts, intimidates or humiliates someone. Examples include:

- Making insulting remarks about someone in front of others
- Spreading rumors or gossip to damage someone's reputation
- Excluding someone from team activities or meetings on purpose
- Assigning impossible workloads or setting someone up to fail

## Crisis management

Know your emergency procedures. In a security emergency, move to safety and call 911. Once safe, alert the SOC for help at 1-866-218-0530.



## ENERGIZE YOUR UNDERSTANDING

**Q:** I saw someone entering our building without a badge and acting suspiciously. What should I do?

**A:** Report it right away to Corporate Security and your supervisor. Acting quickly helps keep everyone safe.

## » HOW OUR VALUES ENERGIZE US

- Prohibition of Workplace Violence, Firearms and Weapons Policy



Powering Up a Positive Work Environment



## Conducting Ourselves Fairly and Ethically

We act with integrity and respect in every interaction. This section covers essential guidelines for fair and honest practices across our business. Acting with integrity means, in part, preventing bribery, competing fairly, marketing and advertising in a fair and ethical manner, complying with laws and government regulations, being truthful, prioritizing product safety and choosing partners who share our values. Together, these principles strengthen our reputation and build trust with everyone with whom we work.

### **IN THIS SECTION:**

- Preventing Bribery and Corruption
- Competing Honestly and Fairly
- Working with Government Customers
- Working with Third Parties Who Share Our Values



Conducting Ourselves  
Fairly and Ethically

# Preventing Bribery and Corruption

## WE ACT WITH INTEGRITY AND FAIRNESS

We do not tolerate bribery and kickbacks at NiSource. This means we do not give or accept anything of value that could unfairly influence business decisions. This applies to interactions with both private companies and government officials. If you need help or have questions, contact the Legal Department.



## WHY IT'S IMPORTANT

Bribery and corruption hurt trust and damage our reputation. They are illegal and can lead to serious consequences for both employees and the Company. By staying alert and acting honestly, we keep NiSource strong and respected. This helps us build trust with employees, customers and partners.

## OUR VALUES IN ACTION

- Never offer or accept bribes or kickbacks.
- Do not offer or give gifts, entertainment, favors or anything to government officials.
- Avoid payments to third parties if you think they could be used for illegal purposes.
- Keep clear and accurate records of all transactions, especially when working in other countries.
- Contact the [Corporate Ethics Department](#) if you need advice about gifts, payments or areas of risk.

## Understanding the Foreign Corrupt Practices Act (FCPA)

The FCPA and similar laws make it illegal to promise or give anything of value to foreign officials, foreign political parties or employees of state-owned companies to get business or an unfair advantage. It is also illegal to make payments if there is a reason to believe the payment will be used illegally. This law also requires good accounting and accurate recordkeeping to prevent hidden payments.



## ENERGIZE YOUR UNDERSTANDING

**Q:** We are thinking about hiring a consultant who knows local government officials. What should we do?

**A:** Talk to the Legal Department before moving forward. Make sure any payments to consultants or third parties are clear and recorded.

## » HOW OUR VALUES ENERGIZE US

- [Anti-Bribery and Corruption Policy](#)



Conducting Ourselves  
Fairly and Ethically

# Competing Honestly and Fairly

## WE UPHOLD FAIRNESS AND INTEGRITY IN EVERYTHING WE DO

We follow all laws related to fair competition and free enterprise. This means we act openly and avoid actions that could harm fair competition. We also gather information about competitors in the right way. Antitrust laws can apply to several business areas, including marketing, procurement, contracting, mergers and acquisitions and placement and operation of our facilities. We also market our services in a fair, truthful and ethical manner, and in compliance with all laws.

## WHY IT'S IMPORTANT

Competing honestly and fairly helps protect our reputation and creates a healthy business environment for our customers and partners. Violating antitrust laws or using unfair practices can lead to serious legal trouble, including fines or jail time. We use marketing, advertisement and promotional materials to educate the public, report to stakeholders, increase awareness, recruit employees and promote our brand.

## OUR VALUES IN ACTION

- Never agree with competitors to fix or control prices; divide customers, territories or markets; or limit competition.
- Avoid actions that could appear to create an unfair advantage to an individual or supplier, such as boycotting certain vendors.
- Be careful when sharing or collecting market information — Only use public and legal sources.
- **Report** any practices that seem unfair or suspicious.
- Contact the Legal Department with questions about antitrust laws, fair business practices or marketing, advertising and promotional materials.



### ENERGIZE YOUR UNDERSTANDING

**Q:** I heard coworkers talking about cutting ties with a supplier to “send a message” about their prices. Should I speak up?

**A:** Yes, you should report this. Boycotting suppliers or taking actions that harm fair competition is against the law and our values. Talk to your manager or the Legal Department to make sure the situation is handled the right way.



Conducting Ourselves  
Fairly and Ethically

### Watch out for agreements that limit competition

Antitrust laws do not allow any agreements, spoken or unspoken, that could limit competition. This includes coordinating prices, dividing customers or markets and not competing fully. Violating these laws can lead to serious penalties.

### Getting competitive information the right way

Only collect information about competitors from public and legal sources. Do not misrepresent yourself or use dishonest ways to get information.

### » HOW OUR VALUES ENERGIZE US

- Antitrust Compliance Policy
- Vendor News Release and Advertising Policy

# Working with Government Customers

## WE UPHOLD HIGH STANDARDS WHEN WORKING WITH GOVERNMENT CLIENTS

We comply with all laws and rules that apply to government contracts. This helps protect our reputation and ensures we can continue doing business with government agencies.



## WHY IT'S IMPORTANT

Working with government customers comes with strict rules. Violating these rules can lead to serious consequences, including being barred from future contracts. By following the laws and maintaining honesty, we build trust and protect our ability to work with government partners.

## OUR VALUES IN ACTION

- Learn, understand and always follow the specific rules for government contracts.
- Do not charge unauthorized or false expenses to government contracts.
- Avoid conflicts of interest involving current or former government employees.
- Never offer gifts, bribes or kickbacks to government employees — The rules around gifts are typically much stricter than those of other customers (this could include items as simple as lunches or dinners).
- Contact the Legal Department for guidance if you have questions about working with government customers.

## Before engaging with government officials

Consult the Legal Department if:

- You want to contact a current or former government official about a job at NiSource
- You are contacted by a current or former government official about possible employment
- You plan to use a former government official as a point of contact with the government



## ENERGIZE YOUR UNDERSTANDING

**Q:** A former government official offered to help connect us with their old agency. Can we use them as a contact?

**A:** You must consult with the Legal Department before using a former government official as a point of contact. There are strict rules around this to ensure compliance with the law.



Conducting Ourselves  
Fairly and Ethically

# Working with Third Parties Who Share Our Values

## WE CHOOSE PARTNERS WHO ALIGN WITH OUR PRINCIPLES

At NiSource, we work with vendors, suppliers, contractors and agents — our third-party providers — based on their quality, price, service and reliability. We value diverse suppliers and small businesses, including those owned by minorities, veterans and women. Our choices are always based on sound business practices, not personal interests.



## WHY IT'S IMPORTANT

Selecting third-party providers who share our values helps maintain trust and high standards. Fair and ethical partnerships promote safety, sustainability, reliability and respect. This protects our reputation and drives value for our customers and stakeholders.

## OUR VALUES IN ACTION

- Choose third-party providers fairly, focusing on quality, service, risk mitigation and value.
- Notify your supervisor and the Senior Vice President of Supply Chain if you have a conflict of interest with any provider.
- Treat all providers with honesty and respect: Never use threats, misrepresentation or unethical tactics.
- Expect providers to maintain a safe and healthy workplace and follow all applicable laws.
- Ensure that providers secure NiSource confidential information and use company assets properly.

## » HOW OUR VALUES ENERGIZE US

- Source to Pay Policy
- [NiSource Human Rights Policy](#)

## Expectations for third-party providers

Our third-party providers must:

- Follow laws related to safety, labor, human rights and the environment
- Promote respect and avoid any form of discrimination or harassment
- Uphold zero tolerance for violence, threats, bullying or aggressive behavior
- Protect NiSource confidential information and manage company records responsibly



Conducting Ourselves  
Fairly and Ethically



## Safeguarding the Assets That Keep Us Energized

Our assets — whether information, technology or reputation — are critical to our success. This section outlines our responsibility to protect confidential information, use equipment and technology securely, safeguard private data and represent NiSource honestly. By respecting and protecting these assets, we remain a reliable and ethical company.

### **IN THIS SECTION:**

- Protecting Confidential Information and Intellectual Property
- Keeping Accurate and Complete Records
- Safeguarding Private Information
- Using Technology and Other Resources Responsibly
- Safeguarding Our Reputation



Safeguarding the Assets  
That Keep Us Energized

# Protecting Confidential Information and Intellectual Property

## WE VALUE AND SAFEGUARD OUR INFORMATION

We protect our confidential information and intellectual property and that which has been entrusted to us. This includes any information created, obtained or used in our business, whether written, spoken or electronic. By securing this information, we build trust and safeguard our competitive edge.

## WHY IT'S IMPORTANT

Confidential information and intellectual property are valuable assets. Protecting them helps us stay competitive and maintain trust. Mishandling these assets can lead to legal consequences and damage our reputation. Keeping information secure also ensures compliance with laws that protect data and privacy.

## OUR VALUES IN ACTION

- Keep all company information secure and do not share it outside the Company, even with family members.
- Share confidential information only with those who need to know and are authorized.
- Use strong passwords and be alert for phishing attacks.
- Lock up sensitive documents and shred them when they are no longer needed.
- Coordinate with the Supply Chain Department, your supervisor and IT before acquiring software — Do not install, copy, modify or distribute software without IT approval.
- Respect copyright laws and avoid reproducing or sharing materials without permission from the owner.

## Types of confidential information

Confidential information includes:

- Customer, employee or vendor information
- Potential products or projects
- Contracts and strategic plans
- Business plans and financial data
- Research data and know-how
- Trade secrets

**Note:** Confidential information does not include data lawfully acquired by nonmanagement employees about wages, hours, benefits or other employment terms if used for activities protected under Section 7 of the National Labor Relations Act, such as collective bargaining or mutual aid.

## What is intellectual property?

Intellectual property includes trade names, trademarks, service marks, trade secrets and copyrighted materials, like software and written work. Some intellectual property, such as trade secrets, is confidential. Other intellectual property, such as a trademark, is available to the public. Much of the graphic and written content that is available on the internet is copyrighted and requires the permission of the owner to copy and distribute legally.



Safeguarding the Assets  
That Keep Us Energized



## ENERGIZE YOUR UNDERSTANDING

**Q:** Can I store confidential company files on my personal cloud storage or USB drive for convenience?

**A:** No. Always use company-approved storage to keep data secure. Personal devices and storage increase the risk of data breaches.

## » HOW OUR VALUES ENERGIZE US

- Information Security and Privacy Policy
- Acceptable Use of Technology Policy
- Technology Resources Policy

# Keeping Accurate and Complete Records

## WE MAINTAIN HIGH STANDARDS OF ACCURACY AND COMPLETENESS IN OUR RECORDS

Our records — whether financial, employee or business documents — help us manage our business, meet legal requirements and build trust with customers, employees and investors.



### WHY IT'S IMPORTANT

Establishing and maintaining a high standard of accuracy and completeness in our business records supports good decision-making, protects NiSource's reputation and keeps us compliant with legal requirements.

### OUR VALUES IN ACTION

- Make sure all records you create or manage are accurate, clear, complete and timely.
- Protect records and follow policies for access, especially for confidential information.
- Follow the Records Retention Schedule and keep records under a Legal Hold as instructed.

### » HOW OUR VALUES ENERGIZE US

- Records and Information Management Policy
- Records and Information Management Site on MySource or contact [RecordsManagement@nisource.com](mailto:RecordsManagement@nisource.com)
- Legal Hold Policy
- If you have any legal hold questions, please contact the [LegalHoldCOE@nisource.com](mailto:LegalHoldCOE@nisource.com)

### Examples of records

A record is any type of information or data created or maintained while conducting business or in supporting our business. These could include the below and includes paper and electronic files:

- Contracts and agreements
- Correspondence, logs and reports

### What is a legal hold?

As outlined in more detail in the NiSource Legal Hold Policy, a legal hold is an instruction to preserve certain records that may be relevant for a variety of legal reasons. When a legal hold is in place, each custodian that received the legal hold must not delete, alter or dispose of any identified records until the hold is released.



Safeguarding the Assets  
That Keep Us Energized



### ENERGIZE YOUR UNDERSTANDING

**Q:** I noticed an error in a report. Should I fix it myself?

**A:** No. Report the error to your supervisor. Changing or deleting information needs approval to ensure accuracy and appropriate control.

# Safeguarding Private Information

## WE RESPECT AND PROTECT PERSONAL INFORMATION

We respect the privacy of our customers and employees. Our privacy program helps ensure that we follow all applicable laws related to collecting, using, storing and transferring personal information.



### WHY IT'S IMPORTANT

Personal information in the wrong hands can lead to serious issues, including identity theft and fraud. By safeguarding this information, we build trust and comply with privacy laws that protect personal data. Failing to handle information properly can harm our reputation and lead to legal consequences.

### OUR VALUES IN ACTION

- Follow NiSource's privacy policies and procedures for handling personal information.
- Limit access to personal data only to those who need it for their work.
- Ensure personal data is stored securely and disposed of properly when no longer needed.
- Be aware of and comply with privacy laws that apply to the collection and use of personal information
- **Report** any suspected data breaches or unauthorized access to your supervisor or the IT department immediately.

### What is personal information?

Personal information includes data that can identify a person, such as:

- Names and addresses
- Social Security numbers
- Financial account details
- Medical or health information
- Employment records

### Understanding privacy laws

Privacy laws, such as the General Data Protection Regulation (GDPR) and state-specific regulations, are designed to protect personal data. These laws set standards for how organizations collect, use and protect private information. Compliance is essential to uphold trust and meet legal obligations.

### » HOW OUR VALUES ENERGIZE US

- Information Security and Privacy Policy
- Privacy Program



### ENERGIZE YOUR UNDERSTANDING

**Q:** I need to share customer information with another department. Is this allowed?

**A:** Yes, but only if it's necessary for work and the receiving department follows the same privacy policies. Always ensure that sharing complies with NiSource's privacy program.



Safeguarding the Assets  
That Keep Us Energized

# Using Technology and Other Resources Responsibly

## WE USE COMPANY TECHNOLOGY RESPONSIBLY AND SECURELY

At NiSource, our technology resources — including computers, email, the internet, phones and other communication tools — are meant for business use. Using these tools in a professional, ethical and lawful way helps protect company data and maintain trust.

## WHY IT'S IMPORTANT

Proper use of technology ensures the security of company and personal information. The attempted or actual misuse of technology can lead to security breaches, data loss and damage to NiSource's reputation. Staying informed and vigilant helps prevent cyberattacks and protects our shared resources. Responsible use of generative artificial intelligence (AI) supports safe and effective innovation.



Safeguarding the Assets That Keep Us Energized



## ENERGIZE YOUR UNDERSTANDING

**Q:** I'm using a company laptop at home, and I get an email asking for my password. It looks official. What should I do?

**A:** Do not respond or share your password. This could be a phishing attempt. Forward the email to [security@nsource.com](mailto:security@nsource.com) by using the Phish Alert icon.

**Q:** Can I use personal software on my company computer if I think it will help my work?

**A:** No, only software approved by IT can be installed on company devices. This ensures compliance with licensing laws and keeps our systems secure.

# Using Technology and Other Resources Responsibly



## OUR VALUES IN ACTION

- Follow all company policies and procedures for using technology and accessing data.
- Use your own passwords and user accounts; never use someone else's.
- Be cautious with emails: Report anything suspicious to security@nisource.com or use the PhishMe Reporter tool.
- Keep your devices secure and report any loss or theft to the IT Service Desk at 877-357-3911.
- Do not install unauthorized software or connect unapproved devices to company networks.
- Access only the systems and files you are authorized to use. Do not attempt to view restricted information.

- Use only generative AI tools that are preapproved by the Company, and limit use to approved business purposes — Ensure outputs are reviewed for accuracy and do not contain confidential information.
- Never input sensitive or confidential company data into AI tools that are not company approved.
- Protect physical assets by reporting missing items, theft and damage — Managers should keep track of them and ensure that direct reports return property in good condition to NiSource upon departure.

**Note:** Users should have no expectation of privacy when using company technology. The Company may monitor and review activity, including emails and internet use, at any time, in accordance with the law.

## Protecting technology resources

- Use strong, unique passwords.
- Avoid visiting nonbusiness websites.
- Don't open suspicious emails or attachments from unknown senders.
- Keep company data secure by using encryption when sending sensitive information.

## Using generative AI responsibly

- Only use company-approved AI tools.
- Do not share confidential or sensitive data with AI platforms.
- Verify the accuracy of AI-generated content before using it.

## » HOW OUR VALUES ENERGIZE US

- Acceptable Use of Technology Policy
- Mobile Device Policy
- Technology Resources Policy



Safeguarding the Assets  
That Keep Us Energized

# Safeguarding Our Reputation

## WE COMMUNICATE RESPONSIBLY AND HONESTLY

How we present ourselves to the public matters. Whether through customer or media interactions, social media posts or marketing efforts, we must maintain a consistent, truthful and respectful approach that aligns with our core values.

## WHY IT'S IMPORTANT

Our reputation affects trust with customers, employees and partners. By communicating accurately and behaving responsibly, we uphold our image and comply with legal and ethical standards. This protects NiSource's reputation as a reliable and trusted company.

## OUR VALUES IN ACTION

- **Media interactions:** Only authorized employees can speak to the media or investors — Direct any media inquiries to Corporate Communications.
- **Social media use:** Use social media responsibly and disclose that your views are your own if you mention NiSource or its business — Never share internal or confidential information, and ensure posts don't imply you represent NiSource unless you are authorized.
- **Honest marketing:** Ensure all marketing and promotional materials are truthful and comply with applicable laws — If you have questions, contact Corporate Communications or the Legal Department.

**Note:** Our policies do not restrict employees from discussing wages, hours or working conditions or from acting under protections provided by laws such as the National Labor Relations Act, the Equal Pay Act and the Occupational Safety and Health Act.



### ENERGIZE YOUR UNDERSTANDING

**Q:** A supplier wants to highlight their partnership with us in a case study. What should I do?

**A:** Refer them to Corporate Communications. While we usually decline such requests for brand and legal reasons, they can review it on a case-by-case basis.



### What counts as personal social media use?

Personal social media platforms include Instagram, TikTok, Facebook, LinkedIn and others that you set up and use on your own. If your profile mentions NiSource, disclose that your views are personal. Never share confidential information or customer data.

### Media and public statements

Only approved spokespersons can represent NiSource publicly. If approached by the media, refer them to Corporate Communications. Remember not to disclose confidential, customer or business details in any conversation, online or offline.

### » HOW OUR VALUES ENERGIZE US

- Employee Media Policy
- Investment Community Disclosure Policy
- Social Media Policy
- Vendor News Release and Advertising Policy



Safeguarding the Assets  
That Keep Us Energized



## No Crossed Wires: Avoiding Conflicts of Interest

Everyone at NiSource must put the Company's interests first, free from personal influence or gain. This section provides guidance on managing conflicts, handling gifts responsibly and preventing insider trading. By staying aware of potential conflicts and making transparent choices, we reinforce ethical standards and promote business relationships based on merit and accountability.

### **IN THIS SECTION:**

Managing Conflicts of Interest  
Exchanging Gifts, Meals and Entertainment Responsibly



**No Crossed Wires:  
Avoiding Conflicts  
of Interest**

# Managing Conflicts of Interest

## WE ARE RESPONSIBLE AND TRANSPARENT

We make decisions that put NiSource first, never letting our personal interests interfere. Acting with integrity is central to NiSource's values. We act with integrity when we consider the best interests of our Company. This includes avoiding situations that could lead to a conflict of interest, or even merely the appearance of one.

A conflict of interest is a situation where our personal interests might interfere with our ability to make objective decisions on behalf of NiSource. Even if we don't intend to let personal interests affect our choices, it might look that way to others. Conducting personal business for monetary gain while working on the job is strictly prohibited.

Directors and employees have a duty to disclose and resolve any potential conflicts as soon as they are aware.

## WHY IT'S IMPORTANT

If people think we're making decisions based on our personal interests at NiSource's expense, they might lose trust in us. This affects how our employees, customers, investors and business partners see NiSource. Protecting our reputation means staying transparent and avoiding conflicts — even situations that only look like one.

## OUR VALUES IN ACTION

- Recognize potential conflicts of interest.
- Avoid real or perceived conflicts.

- Disclose potential conflicts when you become aware of them.
- Resolve conflicts in cooperation with your manager.
- Seek advice from our [Corporate Ethics Department](#) or Legal Department if you think a conflict may exist.

### » HOW OUR VALUES ENERGIZE US

- Conflicts of Interest Policy
- Employment Relationships Policy
- Gifts, Meals and Entertainment Policy
- Outside Work Activities Policy



## ENERGIZE YOUR UNDERSTANDING

**Q:** I've been asked to join the board of a local charity. It's a volunteer role in my free time. Could this be a conflict of interest?

**A:** Serving on a charity board is admirable. However, if the charity's activities relate to NiSource's business, it could create a conflict. Talk to the Corporate Communications team, your manager and our Ethics team to discuss any potential overlap. They'll guide you in managing any conflicts so you can proceed with clarity and integrity.

## WATCH OUT FOR:

### Financial conflicts of interest

- **Investments:** Significant ownership in shares of companies that compete or do business with NiSource, including owning or controlling more than 10% of an entity that does business with NiSource that exceeds \$120,000

**Example:** You own significant shares of a competitor and help make decisions about NiSource's strategies in the same market.

- **Transactions:** Selling anything to or buying anything from NiSource if the total amount exceeds \$120,000

**Example:** You run a small business that sells products to NiSource and decide what the company buys.

- **Family relationships:** Overseeing or influencing the work, hiring or pay of a relative who works for or provides services to NiSource

**Example:** You help choose vendors for NiSource, and a family member owns one of the companies trying to win the contract.

- **Nonfinancial conflicts of interest**

- **Outside activities:** Situations that compete with NiSource, impact NiSource's reputation or affect your job performance

**Example:** You work part-time for a company that competes with NiSource, which could make it hard for you to stay loyal and make the best choices for NiSource.

- **Personal relationships:** Dating someone who reports to you, either directly or indirectly

**Example:** You are dating someone in your department who reports to you, which could make others think you're giving them special treatment and might affect how you judge their work.



**No Crossed Wires:  
Avoiding Conflicts  
of Interest**

# Exchanging Gifts, Meals and Entertainment Responsibly

## WE BUILD BUSINESS RELATIONSHIPS WITH INTEGRITY

The exchange of gifts, meals and entertainment can support business relationships, but it must always be handled carefully. Our goal is to avoid any exchange that might create, or appear to create, a conflict of interest or improper influence on business decisions.

## WHY IT'S IMPORTANT

Gifts, meals and entertainment should never create an obligation. Accepting or offering such exchanges without clear limits can affect our decision-making and impact our reputation. By following this policy, we help ensure that business relationships are based on honesty, not on any sense of obligation.



## OUR VALUES IN ACTION

- Only accept occasional meals or gifts when they are modest and linked to a business event or meeting.
- Never accept or offer cash, gift cards or any other cash equivalents.
- Avoid frequent or extravagant meals and gifts, which can create a sense of obligation.
- Decline any exchange that could appear to influence or obligate you or the other person.
- Seek guidance from your supervisor or the [Corporate Ethics Department](#) if you are uncertain about a gift or event.

### Guidelines for gifts, meals and entertainment

- **OK:** Infrequent, moderately priced meals; inexpensive logo items
- **Seek guidance:** Tickets for events or trips or travel invitations
- **Prohibited:** Cash, gift cards, frequent or extravagant meals and most types of gifts



## ENERGIZE YOUR UNDERSTANDING

**Q:** A vendor wants to give me a small gift card as a thank-you. Is this allowed?

**A:** No, we do not accept cash or cash equivalents, including gift cards, as they could appear to influence your business decisions.

## » HOW OUR VALUES ENERGIZE US

- Gifts, Meals and Entertainment Policy
- NiSource Ethics Hotline for questions and reporting: 1-800-457-2814



**No Crossed Wires:  
Avoiding Conflicts  
of Interest**



## Maintaining Transparent Lines in Disclosure and Financial Reporting

Transparency, accuracy and completeness in our financial records give us a clear picture of our operations and support sound decisions. This section covers our commitment to keeping reliable financial records, preventing fraud and cooperating fully in audits. By handling records responsibly, using resources wisely and supporting transparency in audits, we uphold standards that protect our company and build confidence with our stakeholders.

Anyone involved in our financial disclosure process is required to comply with the Company's disclosure controls and procedures and internal controls over financial reporting. This applies in particular to the Company's senior financial officers (e.g., our chief executive officer, chief financial officer and chief accounting officer).

### **IN THIS SECTION:**

- Having Accurate and Complete Financial Records and Reports
- Preventing Fraud, Waste, Abuse and Money Laundering
- Working with Internal and External Auditors



Maintaining Transparent  
Lines in Disclosure and  
Financial Reporting

# Having Accurate and Complete Financial Records and Reports

**WE ARE RESPONSIBLE FOR TRUTHFUL, ACCURATE, LEGIBLE, COMPLETE AND TIMELY RECORDS AND COMMITTED TO PROTECTING OUR REVENUE, ASSETS AND REPUTATION IN SUPPORT OF ACCURATE FINANCIAL REPORTING.**

True and accurate financial records serve as a basis for managing our business and are crucial for meeting obligations to employees, customers, investors and others, as well as complying with laws.

## WHY IT'S IMPORTANT

Maintaining a system of internal controls and enacting disclosure processes helps reduce fraud and ensures our public disclosures comply with laws, rules and regulations. Mistakes or omissions in records can lead to serious penalties. Falsification or misrepresentation of any information and data is strictly prohibited.

## OUR VALUES IN ACTION

- Make sure all business, regulatory or financial records you create or manage are accurate, clear, complete and timely.
- Use source documents like time sheets, expense reports and invoices to support financial records.
- Follow disclosure controls and procedures and internal controls over financial reporting.
- Review disclosures carefully for accuracy and completeness.

- Report any suspected errors in records or fraudulent activity to your supervisor right away.
- Anyone with a direct or supervisory position regarding our public filings and communications should, within their areas of responsibility, consult with others and take steps to ensure full, fair, accurate, timely and understandable disclosures.

### Examples of records

Records include:

- Employee expense reports
- Customer contracts and agreements
- Invoices and sales receipts
- Time sheets and payroll records

### » HOW OUR VALUES ENERGIZE US

- Investment Community Disclosure Policy
- Records and Information Management Policy
- Records and Information Management Site on MySource or contact [RecordsManagement@nsource.com](mailto:RecordsManagement@nsource.com)



## ENERGIZE YOUR UNDERSTANDING

**Q:** I noticed an error in a financial report. Should I fix it myself?

**A:** No. Report the error to your supervisor. Changing or deleting information needs approval to ensure accuracy and appropriate control.



**Maintaining Transparent Lines in Disclosure and Financial Reporting**

# Preventing Fraud, Waste, Abuse and Money Laundering

## WE PROTECT OUR RESOURCES AND ACT WITH INTEGRITY

Using company resources responsibly is essential at NiSource. Fraud, waste, abuse and money laundering can harm our reputation, drain resources and impact our ability to serve customers. Each of us has a role in preventing these actions.

## WHY IT'S IMPORTANT

Preventing fraud, waste, abuse and money laundering protects NiSource's assets, controls costs and builds trust. Misusing resources, engaging in dishonest practices or allowing money laundering can lead to serious consequences for individuals and the Company.



## OUR VALUES IN ACTION

- Be honest in all records and transactions, such as time sheets, expense reports and invoices.
- Use company resources like time, materials and funds only for business purposes.
- Be suspicious of large cash payments, requests to process funds outside normal procedures or transactions that seem unnecessary or overly complex.
- **Report** any suspicious activities, wasteful practices, suspected fraud or unusual transactions to your supervisor, the NiSource Ethics Hotline or the Legal Department.

## Examples of fraud, waste and abuse

These include:

- Creating fake vendors to receive unauthorized payments
- Intentionally miscoding your time sheet or invoices
- Misreporting expenses for personal gain
- Allowing unnecessary spending or wasteful practices

## What is money laundering?

Money laundering is the crime of hiding illegal funds by passing them through legitimate business transactions. Actions that further money laundering include:

- Accepting payments from unknown sources or using company accounts to process suspicious financial transactions
- Splitting transactions into smaller amounts to avoid reporting requirements
- Failing to verify customer or vendor identities in financial dealings

## » HOW OUR VALUES ENERGIZE US

- [Anti-Bribery and Corruption Policy](#)
- [Fraud Prevention Policy](#)



## ENERGIZE YOUR UNDERSTANDING

**Q:** I suspect a coworker is misreporting hours on their time sheets. What should I do?

**A:** Report your concerns to your supervisor or the NiSource Ethics Hotline.

**Q:** I noticed an unusual payment from an unknown company that doesn't match any services we use. What should I do?

**A:** Report it immediately to your supervisor or the NiSource Ethics Hotline. Unexplained payments could be a sign of fraud or money laundering. Reporting helps protect the Company and ensures compliance with the law.



Maintaining Transparent Lines in Disclosure and Financial Reporting

# Working with Internal and External Auditors



## WE UPHOLD TRANSPARENCY AND INTEGRITY IN THE AUDIT PROCESS

At NiSource, financial and operational audits by internal and external auditors, as well as regulatory agencies, are essential to ensure we follow our policies and identify any areas for improvement. Cooperating fully and honestly in audits protects our integrity and helps us meet our obligations.

## WHY IT'S IMPORTANT

Audits help verify that NiSource follows both financial and nonfinancial policies, procedures and controls. By cooperating with auditors, we help maintain transparency, strengthen internal controls and uphold trust with our investors, regulators and the public. It also provides opportunities for improvement and helps identify where we are not following, or unable to follow, our policies and procedures.

## OUR VALUES IN ACTION

- Provide clear, truthful information to all auditors and regulatory agencies.
- Senior financial officers and anyone involved in disclosures should be familiar with our disclosure requirements and business operations.
- Do not misrepresent facts to auditors, regulators or others inside or outside the Company.
- Do not take any actions to fraudulently influence, coerce, manipulate or mislead independent auditors.
- Contact the NiSource vice president and chief accounting officer if you need to request services from our independent financial statement auditor — This includes hiring a current employee of NiSource's independent financial statement auditor.

### Independent auditor

The Company uses an independent auditor to audit our financial statements. To maintain the independence of our independent financial statement auditor, any request for audit or non-audit services must be preapproved. This ensures that auditors remain objective in their work with us.

### » HOW OUR VALUES ENERGIZE US

- Fraud Prevention Policy



### ENERGIZE YOUR UNDERSTANDING

**Q:** I've been asked a question by an external auditor, but I'm not sure of the answer. What should I do?

**A:** Be honest and transparent. If you're unsure, let the auditor know you will follow up. Then consult with your supervisor or another knowledgeable colleague to provide an accurate response.



Maintaining Transparent Lines in Disclosure and Financial Reporting



## Fueling Our Communities with Good Citizenship and Compliance with Laws

At NiSource, we are committed to being a positive force in the world. This section outlines our role in complying with applicable laws, rules and regulations and promoting sustainability and good corporate citizenship, including supporting our communities and engaging in the political process ethically. Through responsible actions in each of these areas, we contribute to a healthier environment, a fairer society and stronger communities.

### IN THIS SECTION:

- Promoting Sustainability and Respecting Human Rights
- Contributing to Our Communities
- Engaging in the Political Process Ethically
- Preventing Insider Trading
- Ensuring Affiliate Compliance
- Upholding Our Commitment to Regulatory Compliance



Fueling Our Communities  
with Good Citizenship  
and Compliance  
with Laws

# Promoting Sustainability and Respecting Human Rights

## WE ARE COMMITTED TO ADVANCING OUR MISSION, VISION AND VALUES

We take responsibility for promoting sustainability across our operations, including fair treatment for all. We strive to protect the environment and respect human rights, meet regulatory standards and pursue proactive measures that provide a sustainable environment and workplace for future generations.

## WHY IT'S IMPORTANT

Our business affects our customers, employees, the environment and our communities, and managing those impacted responsibly is essential. By prioritizing sustainability and good corporate citizenship, we not only comply with laws and regulations (including environmental and fair labor standards) but help keep our planet livable and beautiful, further a safe and respectful work environment and maintain our reputation as an ethical company. Acting as governance stewards supports a sustainable future and demonstrates NiSource's commitment to industry leadership.

## OUR VALUES IN ACTION

- Follow all environmental and labor laws and regulations to ensure compliance, including laws regarding minimum wage, overtime, payday, immigration, forced labor and child labor.
- Seek opportunities to improve our performance through self-assessment and setting measurable goals.
- Reduce waste, air emissions and water use, particularly in areas facing water scarcity.
- Contribute to energy efficiency and help customers reduce their environmental impact.
- Participate in open discussions with employees and stakeholders on environmental and social programs.
- Treat all employees and partners with respect and promote a workplace free from discrimination, harassment, threats or abuse.
- Cultivate an environment of mutual respect in which we accept and value the different perspectives of our customers, communities, workforce and suppliers.
- **Report** any concerns about human rights or unethical treatment immediately through the [NiSource Ethics Hotline](#) or other reporting channels.

## Ethical business and our goals

Aligning our business with our values helps NiSource meet its goals by:

- Promoting legal compliance
- Building a culture of responsibility
- Conducting strong governance across our operations

## Environmental guideposts at NiSource

- Reducing air emissions from our operations
- Minimizing waste and handling it responsibly
- Conserving water and biodiversity on our lands

## Human rights principles at NiSource

NiSource is guided by principles from:

- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organization's Fundamental Conventions

## » HOW OUR VALUES ENERGIZE US

- [Environmental Policy](#)
- [NiSource Human Rights Policy](#)



## ENERGIZE YOUR UNDERSTANDING

**Q:** What should I do if I notice a process in our operations that may harm the environment?

**A:** **Report** it to your supervisor or the Environmental team. NiSource encourages proactive action to address environmental concerns.

**Q:** What should I do if I suspect a violation of labor laws, such as underpayment or unsafe conditions?

**A:** **Report** it right away to your supervisor or the NiSource Ethics Hotline. Protecting fair labor practices is part of our commitment to human rights.



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# Contributing to Our Communities



## WE GIVE BACK AND MAKE A POSITIVE IMPACT

We support the communities where we live and work. Through charitable contributions and volunteer efforts, we strive to create positive change and strengthen our communities.

## WHY IT'S IMPORTANT

Supporting our communities builds goodwill, and it aligns with our values. By giving back, we help address local needs, improve quality of life and inspire a culture of caring and involvement among our employees.

## OUR VALUES IN ACTION

- Volunteer in community programs that align with NiSource's values, using time and resources responsibly.
- Follow company guidelines for making charitable contributions to ensure donations are ethical and align with our goals.
- Participate in company-sponsored volunteer events and encourage team involvement to increase our community impact.
- Avoid using company resources or donations to support personal or political interests.
- Seek guidance from your supervisor or Corporate Communications if you have questions about community involvement or donations.

### Supporting our communities

NiSource actively supports:

- Charitable organizations that align with our mission
- Volunteer events focused on education, environment and community well-being



## ENERGIZE YOUR UNDERSTANDING

**Q:** I'm passionate about a local animal rescue group and want to organize a fundraiser at work. Can I use company email and conference rooms to promote the event?

**A:** It's great that you want to support a local cause — Community involvement is important to us. Since this isn't a company-sponsored event, please check with your supervisor or Corporate Communications before using company resources. They'll help make sure everything aligns with our guidelines and community focus areas.



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# Engaging in the Political Process Ethically

## WE PARTICIPATE IN POLITICS RESPONSIBLY AND TRANSPARENTLY

We engage in the political process to support issues that directly impact our business. However, we ensure that all political involvement is ethical and transparent and follows applicable laws.

## WHY IT'S IMPORTANT

Engaging in the political process responsibly protects NiSource's reputation and ensures compliance with legal requirements. By separating personal political activity from company business, we maintain clear boundaries and uphold trust with our stakeholders.

## OUR VALUES IN ACTION

- **Corporate political contributions:** NiSource does not use corporate funds for federal or state candidates or make direct independent expenditures at the federal level — We may use corporate funds for indirect political support at the state and local level for groups that are aligned with our public policy views, where permitted by law.
- **NiSource Political Action Committee (NiPAC):** NiPAC is a voluntary, employee-funded political action committee that contributes to candidates from both political parties who align with our business interests — NiPAC operates transparently and complies with all legal regulations.
- **Personal political activity:** NiSource encourages employees to engage in the political process as private citizens, but they must keep personal political activity separate from company business — Do not use company time or resources for personal political purposes.
- **Transparency:** NiSource discloses its political spending and oversight procedures on our public website and complies with all federal and state disclosure requirements to maintain transparency.



### ENERGIZE YOUR UNDERSTANDING

**Q:** Can I use my NiSource email to send information about a political event to my coworkers?

**A:** No, you should not use company resources for personal political activities. Keep personal political involvement separate from work.



### Guidelines for political involvement

- Participate in NiPAC voluntarily and in accordance with established laws and guidelines.
- Use personal resources and time for any individual political activities.
- Avoid using company assets for personal political contributions or activities.

### » HOW OUR VALUES ENERGIZE US

- [Political Spending Policy](#)
- [Public Disclosure of Political Spending](#)



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# Preventing Insider Trading

## WE HANDLE COMPANY INFORMATION WITH INTEGRITY

In our work, we may come across information that isn't public but could affect stock prices. Using this information to buy or sell stock, or sharing it with others, is illegal, unethical and against our Code.

Directors and executive officers must also comply with additional securities laws, such as short-swing trading and reporting and should visit our insider trading policy for more information.



## WHY IT'S IMPORTANT

Insider trading can damage our reputation and lead to serious legal penalties for both the Company and the individuals involved. By following this policy, we help ensure fair markets and build trust with our shareholders and the public.

## OUR VALUES IN ACTION

- Do not buy or sell NiSource stock, or the stock of other companies, based on information that isn't public and could affect stock prices.
- Never share material, nonpublic information with anyone outside NiSource, including family and friends.
- Avoid discussing or hinting at confidential business news.
- Remember, material information includes anything that could affect a company's stock value, whether good or bad.
- Reach out to the Legal Department if you are unsure whether information is public or material.

### What is material, nonpublic information?

Material, nonpublic information is any information that could reasonably affect stock prices and is information not generally available to the public. Examples include:

- Changes in dividends
- Projected earnings or major financial results
- Big contracts, acquisitions or expansion plans
- Major actions by regulators
- Major management changes
- Any other information that could affect the price of stock

### » HOW OUR VALUES ENERGIZE US

- Securities Transactions Compliance Policy



## ENERGIZE YOUR UNDERSTANDING

**Q:** I learned about a possible merger before it was announced. Can I discuss it with a friend who might want to invest?

**A:** No, sharing material, nonpublic information, even with family or friends, is illegal. Keep such information confidential until it's public. You are also prohibited from buying or selling or otherwise transacting in stock while having this information, including changing your elections under your 401(k) or employee stock purchase plan.



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# Ensuring Affiliate Compliance

WE HONOR OUR REGULATORY RESPONSIBILITIES AND MANAGE AFFILIATE RELATIONSHIPS WITH INTEGRITY



## WHY IT'S IMPORTANT

Following affiliate transaction rules protects the integrity of our operations and ensures we don't give preferential treatment to any affiliate. It also helps prevent unauthorized sharing of confidential information and ensures costs are recorded accurately. Regulatory bodies may audit our compliance, and violations could result in serious consequences for our business and reputation.

## OUR VALUES IN ACTION

- Ensure transactions between affiliates follow approved rates and are properly documented.
- Do not share nonpublic operational or customer information with affiliates without appropriate consent or regulatory approval.
- Comply with organizational separation rules, including information firewalls.
- Treat all marketers and customers equitably and without discrimination.
- Consult the Legal Department when you are unsure about the need for regulatory approvals or information-sharing limits.



## ENERGIZE YOUR UNDERSTANDING

**Q:** I'm working on a project that involves another NiSource affiliate. They asked for customer usage data to support their proposal. Can I share it?

**A:** Not without checking first. Sharing customer information between affiliates may be restricted by regulation or require customer consent. Contact the Legal Department to ensure we are complying with all relevant rules before disclosing any information.

## » HOW OUR VALUES ENERGIZE US

- Legal Federal Regulatory Site



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# Upholding Our Commitment to Regulatory Compliance

WE UPHOLD OUR COMMITMENT TO REGULATORY COMPLIANCE AND ETHICAL CONDUCT IN EVERY TRADE AND TRANSACTION



## WHY IT'S IMPORTANT

The Dodd-Frank Act, through the Commodity Futures Trading Commission (CFTC), sets standards to ensure transparency, accountability and ethical conduct in U.S. financial markets. As a party to regulated trades, NiSource complies with CFTC rules, particularly around recordkeeping and fraud prevention. Adhering to these standards is essential to maintain trust with our stakeholders and meet our regulatory responsibilities. Additionally, our involvement with government entities requires special care to comply with distinct legal and ethical requirements.

## » HOW OUR VALUES ENERGIZE US

- CFTC No. 1 — Futures and Swap Execution, Clearing and Identification
- CFTC No. 2 — Futures and Swap Recordkeeping Requirements
- CFTC No. 3 — Futures and Swap Data Reporting
- CFTC No. 4 — Anti-Fraud, Anti-Manipulation, Anti-Disruptive Practices, and Anti-Evasion Provisions
- CFTC Part 46 — Historical Swap Recordkeeping Requirements
- Trader Handbook
- NiSource Corporate Commodity Risk Management Policy
- Credit Risk Management Policy
- Energy Supply & Optimization Risk Management Policy
- Legal Federal Regulatory Site

## OUR VALUES IN ACTION

- Follow NiSource's CFTC compliance procedures, including those on swap execution, clearing and data reporting.
- Maintain accurate and complete records for all regulated trades.
- Refer all government or regulatory inquiries to the Legal Department unless authorized to respond.
- Understand and respect the unique rules that apply when doing business with government entities.
- Consult your supervisor or the Legal Department if you are unsure about compliance requirements or permissible actions.



## ENERGIZE YOUR UNDERSTANDING

**Q:** I received a subpoena related to a past trade. What should I do?

**A:** Do not respond directly. Immediately contact the Legal Department, which is responsible for handling such matters. They will ensure our response complies with legal and regulatory obligations.



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**OUR CODE OF BUSINESS CONDUCT:  
ENERGIZED BY OUR VALUES**

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