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Orlando Utilities Commission:

POWERED BY INTEGRITY

CODE OF
ETHICS
&
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CONDUCT





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MESSAGE FROM OUR CEO

Since 1923, Orlando Utilities Commission (OUC) has pioneered electrical and water technology, built state-of-the-art facilities and systems, and embraced clean energy to help meet the needs of our growing community. When our customers flip a switch or turn on the tap, they can rest assured that their homes and businesses will have ready access to reliable power and fresh, great-tasting water. Wherever you go in the heart of Florida, you'll find thriving businesses and communities. We're proud to be a part of their unique stories, and it's you, our employees, who make it happen.

You have helped us earn the reputation of a provider that delivers on its promises with integrity, building trust not through the things we say, but through the ethical actions we take. Our Code of Ethics and Business Conduct shows us how. It's our guide to keeping OUC's promises and reaching our goals without compromising our Values.

We rely on you to read the Code carefully and keep it in mind in your daily work. It can help you through common workplace situations and point you to the right resources when things get complicated. Once you read the Code, you'll also be prepared to identify things that could violate it, so refer to it often and speak up when something doesn't seem right.

OUC's legacy is a long and successful one, and we're determined to preserve it for future generations. I'm confident we can do that by being the engine that makes OUC the one **Powered by Integrity** – being our best and doing our best ethically to protect OUC and the communities we call home.

Clint Bullock
General Manager and CEO



OUR GUIDING PRINCIPLES

MISSION

Provide exceptional value to our customers and community through the delivery of sustainable and reliable services and solutions.

VISION

OUC is an innovative solutions leader and the partner of choice.

STRATEGY

- Provide **CUSTOMERS** an outstanding experience through our value-added services and sustainable, highly reliable and innovative solutions.
- Strengthen **EMPLOYEE** engagement through continuous improvement of our workplaces, processes and organization.
- Serve our **COMMUNITY** as a committed partner, sustainability leader and trusted corporate citizen.

CORE VALUES



MAKE SAFETY FIRST

We make **safety our priority** – demonstrating we care by protecting the physical, mental and emotional health of others.



DO THE RIGHT THING

We trust each other to act with integrity and **do the right thing** – even when it's hard.



PARTNER TOGETHER

We are one team and **partner together** to create value for our customers, our community and each other.



DRIVE INNOVATION

We welcome new ideas in our quest to find a better way of doing business as we **drive innovation**.



DELIVER RESULTS

We are accountable and follow through on our commitments to **deliver results** that create value.



VALUE THE CUSTOMER

We **value our customers** – external and internal – always striving to exceed their expectations.



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OUR CODE

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OUR CODE

PURPOSE AND OVERVIEW

Since 1923, OUC has been a dynamic, innovative force in our community, providing essential energy and water services while ever evolving to meet customer needs. From the beginning, we have led by thinking forward – pioneering new products, processes and technologies. We're proud of our legacy and recognize the responsibility we have to support our communities without fail. Whether our jobs are in the field or in one of our facilities, each of us follows the same approach: acting honestly and basing every action and decision on integrity.

After all, we don't just serve our communities – we live here, too. We have a personal stake in doing what's right and what's best for those we serve. Together, we have the power to build an even better future for our organization and keep our region vibrant and strong.

This Code of Ethics and Business Conduct (“Code”) is an important and valuable resource. It acts as a reference to help you:

- **Comply with applicable laws, regulations and OUC policies.**
- **Promote integrity and the highest standards of ethical conduct.**
- **Address common ethical situations you could encounter in your work.**
- **Avoid even the appearance of anything improper in connection with OUC's activities.**

COMPLYING WITH LAWS AND REGULATIONS

OUC is committed to compliance with all laws, rules and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face – so, in addition to the Code, OUC also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgement and to seek help when you need it.

We operate in the United States, but if we do business internationally, it's important to be aware of different laws and customs that may apply. While we respect the norms of our business partners throughout the world, all employees must, at all times, comply with the standards and principles in this Code. If you feel that compliance with any provision of our Code would conflict with a law, regulatory requirement or our Charter, you should promptly seek guidance from the [Legal Department](#).

[OUC Charter](#)



OUR CODE

PARTNERS IN THIS CODE

All employees of OUC, including members of our Governing Board (“Commissioners”), are required to read, understand, and meet the standards and obligations in this Code.

All business partners, including consultants, agents, suppliers, contractors and other third parties working contractually on behalf of OUC, serve as an extension of OUC. They are expected to follow our policies and high standards, as well as any applicable contractual provisions, when working on behalf of OUC. If you supervise our business partners, you are responsible for communicating our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their contract.

If at any time you have any questions or concerns about your job, behaviors of a contractor or the policies of OUC, you are urged – and do not hesitate – to consult first with your immediate supervisor or manager who is here to help you.

Each of us must take responsibility for acting with honesty and integrity, even when this means making difficult choices. Meeting our responsibilities is what enables us to succeed and grow.

- Always act in a professional and ethical manner when acting on behalf of OUC.
- Know the information in the Code and written OUC policies, and pay particular attention to the topics that apply to your specific job responsibilities.
- Complete all required employee training in a timely manner and keep up-to-date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies or the law to your immediate supervisor, manager, an executive or any of the resources listed in this Code.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter, remove or destroy records in response to an investigation or when an investigation is anticipated.

Remember: No reason, including the desire to meet business goals or pressure from management, will justify an intentional violation of our Code, our policies or the law.

SPOTLIGHT ON INTEGRITY

→ I'm a Manager and not clear on what my obligations are if someone comes to me with an accusation – and what if it involves a Senior Leader?

No matter who the allegation involves, you must report it. OUC provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code or another member of management.

→ I observed misconduct in an area not under my supervision. Am I still required to report the issue?

You are chiefly responsible for employees, contractors and other third parties under your supervision. All OUC employees are required to report misconduct. As a leader, you are obliged to be proactive. The best approach is to talk first with the Manager who oversees the area where the problem is occurring, but if this isn't feasible or effective, you should use the other resources described in our Code.



OUR CODE

MAKING GOOD DECISIONS

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you're not alone. There are resources available to help you.



FACING A DIFFICULT DECISION? IT MAY HELP TO ASK YOURSELF:

IS IT LEGAL?

IS IT CONSISTENT
WITH OUR CODE,
VALUES, POLICIES AND
PROCEDURES?

WOULD I FEEL
COMFORTABLE IF
MANAGEMENT AND
OTHERS WITHIN OUC
KNEW ABOUT IT?

WOULD I FEEL
COMFORTABLE IF
MY DECISION OR
MY ACTIONS WERE
MADE PUBLIC AND
REPORTED IN MEDIA

If the answer to all of these questions is **“yes,”** the decision to move forward is probably OK. However, if the answer to any question – especially the first one – is **“no”** or **“I’m not sure,”** you must promptly stop and seek guidance from the proper person or department.

Remember: In any situation and under any circumstances, it is always appropriate to ask for help or guidance.

One More Thing: We value your feedback. If you have suggestions for ways to enhance our Code, our policies or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical OUC is a responsibility we all share.



OUR CODE

ASKING QUESTIONS AND REPORTING CONCERNS

If you see or suspect any violation of our Code, our policies or the law, or if you have a question about what to do, always talk to your immediate supervisor or manager first. If you are uncomfortable speaking with your immediate supervisor or manager, there are other resources available to help you:

- Contact another member of management
- Contact Human Resources
- Contact the OUC Report Line

By phone at **1.833.310.0010**

Online at www.oucreportline.com

http://oucweb/oucdocs/report_line/Report_Line_Reference_Guide.pdf

SPOTLIGHT ON INTEGRITY

→ **Our Manager typically does nothing when concerns about potential misconduct are brought to their attention, and I believe they have made things difficult for coworkers who have raised issues. I have a problem – a coworker is doing something that I believe to be ethically wrong. What should I do?**

Take action and speak up. You are required to report misconduct. While starting with your Manager is often the best way to efficiently address concerns, if you do not believe that it is appropriate or do not feel comfortable doing so, you should talk to another member of management or any of the resources listed in the Code.

WHAT TO EXPECT WHEN YOU USE THE OUC REPORT LINE

The OUC Report Line web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns and forward a written report to OUC for further investigation.

When you contact the OUC Report Line, you may choose to remain anonymous to the extent permitted by law. All reports will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that due to privacy requirements, OUC will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember: An issue cannot be addressed unless it is brought to someone's attention.





OUR CODE

OUR NON-RETALIATION POLICY

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies or the law, or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.

ACCOUNTABILITY AND DISCIPLINE

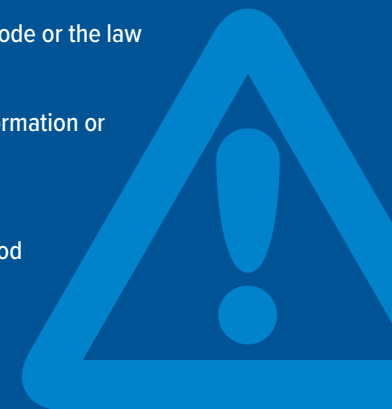
Violating our Code, our policies or the law or encouraging others to do so, exposes OUC to liability and puts our reputation at risk. If an ethics or compliance problem does occur, you are required to report it so that an effective solution can be developed. You should also understand that violations of our Code can result in progressive discipline or possible termination of employment. Violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution. Keep in mind that no one – no matter their position at OUC – is exempt from disciplinary action when a violation occurs.

SPOTLIGHT ON INTEGRITY

→ **I suspect there may be some unethical behavior going on in my business unit involving my Manager. I know I should report my suspicions, and I’m thinking about using the OUC Report Line, but I’m concerned about retaliation.**

ACTS THAT CAN LEAD TO DISCIPLINARY ACTION INCLUDE, BUT ARE NOT LIMITED TO:

- Authorizing or participating in actions that violate the Code or the law
- Failing to report or delays reporting a violation
- Failing to cooperate in an investigation, concealing information or obstructing an investigation
- Falsifying information
- Retaliating or discriminating against anyone who, in good faith, reports a suspected violation or cooperates in an investigation
- Failing to complete or falsely completing a certification of compliance questionnaire



BASED ON THE SEVERITY OF THE INFRACTION, DISCIPLINARY ACTIONS MAY INCLUDE:

- Verbal warning or reprimand
- Written warning
- Suspension
- Demotion
- Financial sanction
- Restitution for losses or damages
- Termination of employment
- Referral to law enforcement



Progressive Discipline Policy

You are required to report misconduct and, in your situation, using the OUC Report Line is a good option. If you believe you are experiencing any retaliation after making a report, you should report it. We take claims of retaliation seriously. We will thoroughly investigate your suspicions and may need to talk to you to gather additional information.



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OUR PEOPLE

**DIVERSITY, EQUAL OPPORTUNITY
AND NON-DISCRIMINATION**

HARASSMENT-FREE WORKPLACE

SAFE AND HEALTHY WORKPLACE



OUR PEOPLE

DIVERSITY, EQUAL OPPORTUNITY AND NON-DISCRIMINATION

OUC helps bring together employees with a wide variety of backgrounds, skills and cultures. Our approach to Diversity, Equity and Inclusion (DEI) and non-discrimination is based on understanding, embracing and leveraging what makes each of us unique. Our vision is achievable only if we empower all OUC team members to contribute their talent, skills, expertise and creativity. With this inherent value of DEI to OUC's long-term success, we're working to cultivate an environment of belonging for everyone.

Our colleagues, job applicants and business partners are entitled to respect and should be considered on the basis of their qualifications, demonstrated skills and achievements.

We comply with laws prohibiting discrimination based on protected characteristics such as a person's race, color, gender, national origin, age, religion, sexual orientation, gender expression, sex (including pregnancy), disability, genetic information, veteran status or marital status.

BE RELIABLY ETHICAL:

- Treat others respectfully and professionally.
- Promote diversity, equity and inclusion in hiring and other employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or OUC policy.

STAY ALERT FOR:

- Comments, jokes or materials, including emails, which others might consider offensive.
- Inappropriate bias when evaluating others. If you supervise others, evaluate them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.

SPOTLIGHT ON INTEGRITY

→ **One of my coworkers makes jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?**

You should notify your immediate supervisor or manager, Human Resources or the OUC Report Line. Making these kinds of jokes violates our Values as well as our standards on diversity, harassment and discrimination. By doing nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.





OUR PEOPLE

HARASSMENT-FREE WORKPLACE

We all have the right to work in an environment that is free from intimidation, harassment and abuse. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment is not tolerated.

AT OUC, WE DO NOT TOLERATE:

- Threatening remarks, obscene phone calls or electronic/online messaging, stalking or any other form of harassment.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Threatening, intimidating or coercing others on or off the premises, in person or by electronic means – at any time, for any purpose.

SEXUAL HARASSMENT:

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions such as a request for a date, a sexual favor or other similar conduct of a sexual nature.
- An intimidating, offensive or hostile work environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.

BE RELIABLY ETHICAL:

- Promote a positive attitude toward policies designed to build a safe, ethical and professional workplace.
- Never tolerate any type of harassment including threatening physical or psychological actions, requests for sexual favors or other unwelcome verbal or physical conduct.
- Demonstrate professionalism. Do not visit, share or link others to inappropriate internet sites or display sexually explicit or offensive pictures, memes or messages.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

- Help each other by speaking out when a coworker's conduct makes others uncomfortable.

STAY ALERT FOR:

- Unwelcome remarks, gestures or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering or staring suggestively at another.
- Verbal abuse, threats, taunting or micro-aggressions.

Remember: Speak up if you become aware of any of these activities.



Policy Against Harassment

SPOTLIGHT ON INTEGRITY

→ **After work one day, a number of co-workers on my team went out for drinks. One colleague repeatedly made comments about my appearance that made me uncomfortable. I asked them to stop, but they wouldn't. Since we weren't in the office and it was after regular working hours, I wasn't sure what I should do. Is it harassment?**

No matter who the allegation involves, you must report it. OUC provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code or another member of management.

→ **I just learned that a good friend of mine has been accused of sexual harassment and that an investigation is being launched. I can't believe it's true, and I think it's only fair that I give my friend an advance warning or a "heads up" so they can defend themselves. Don't I have a responsibility as a friend to tell them?**

An allegation of sexual harassment is a very serious matter with implications not only for the individuals involved but also for OUC. Under no circumstances should you give them a "heads up." Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. Alerting your friend could jeopardize the investigation, result in you being disciplined and expose OUC to additional risk and possible costs.



OUR PEOPLE

SAFE AND HEALTHY WORKPLACE

Safety is our first priority and is an integral part of everything we do. Each of us is responsible for acting in a way that protects the physical and psychological well-being of ourselves and others.

We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. Situations that may pose a health, safety or environmental hazard should be reported immediately. All reports can be made without fear of retaliation.

Remember OUC's rule: if you see something, say something.

Safety is a condition of employment, and we expect the commitment of each Commissioner, Management and employee to make OUC an accident-free workplace.

BE RELIABLY ETHICAL:

- Put safety first by following safety, security and health rules and practices that apply to your job, including the [Safe Work Practices Manual](#).
- Actively participate in safety meetings and training sessions.
- Notify your immediate supervisor or manager immediately about any unsafe equipment, conditions or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Report all accidents and injuries while on duty, whether vehicular or personal, to Service Dispatch and your immediate supervisor or manager.
- Wear all required personal protective equipment. Ask for guidance if you are ever unsure which equipment to use.
- Maintain a neat, safe working environment by keeping workstations, aisles, OUC vehicles and other workspaces free from obstacles, wires and other potential hazards.
- Help each other by speaking out when a coworker's conduct makes others uncomfortable.

STAY ALERT FOR:

- Unsafe practices or work conditions or other violations of our safety and security rules and regulations.
- Carelessness in enforcing [site/physical security standards](#), such as facility entry procedures and cybersecurity protocols.





OUR PEOPLE

ALCOHOL AND DRUGS

WHILE AT WORK OR ON OUC BUSINESS:

- You should be always ready to carry out your work duties – never impaired.
- Do not use, possess or be under the influence of unprescribed or illegal drugs or any substance that could interfere with a safe and effective work environment or harm OUC's reputation.
- You must immediately notify your manager and/or Human Resources when under medically prescribed treatment with a controlled substance that may limit your ability to perform your job in a safe manner.
- Be aware that OUC reserves the right to conduct drug and alcohol testing of our employees and job applicants and to search any property or equipment brought to our facilities for illicit substances and paraphernalia.

WORKPLACE VIOLENCE

**VIOLENCE OF ANY KIND HAS NO PLACE AT OUC.
WE WON'T TOLERATE:**

- Intimidating, threatening or hostile behavior; by an individual or the incitement or encouragement thereof.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage or other criminal activities.
- The carrying of weapons, such as firearms, explosives or other dangerous weapons onto OUC property or in OUC vehicles, unless you are authorized to do so by the Legal Department.
- Inflicting or threatening injury or damage to another person's life, health, well-being, family or property.



[Alcohol and Drug Policy](#)

[Identification Card Policy](#)

[Information Systems Security Policy](#)

[Physical Safeguards Policy](#)

[Safety Policy](#)

[Security Policy](#)

[Vehicle Safety Policy](#)

[Workplace Violence Policy](#)

SPOTLIGHT ON INTEGRITY

→ **I've noticed some practices in my area that don't seem safe.
Who can I speak to? I don't want to be considered a troublemaker.**

Discuss your concerns with your Manager, Human Resources or the OUC Report Line. It is important to remember that raising a concern about safety does not make you a troublemaker; instead, it makes you a responsible employee concerned about the safety of others.

→ **Are contractors expected to follow the same health, safety and security policies and procedures as employees?**

Absolutely. Supervisors are responsible for ensuring that contractors and vendors at work on OUC premises understand and comply with all applicable laws and regulations governing the particular facility, as well as with additional requirements OUC may impose.



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OUR COMMUNITY

ENVIRONMENTAL STEWARDSHIP

CORPORATE STEWARDSHIP



OUR COMMUNITY

ENVIRONMENTAL STEWARDSHIP

We recognize our environmental and societal responsibilities, including maintaining the highest environmental stewardship standards. For this reason, we are committed to sustainability and the health and safety of employees, customers and the public while meeting the expectations of our customers in having safe, reliable and affordable service.

We strive to maintain our facilities and run our business operations in a responsible manner. With the cooperation of our employees, customers, contractors and suppliers, OUC will continuously improve on environmental and sustainability practices.



BE RELIABLY ETHICAL:

- Do your part to ensure that protecting team member safety and the environment is a priority. Stop work and report any situation that you believe could result in an unsafe working condition or violates environment regulations.
- Read and understand all the information provided by OUC that is relevant to your job and the health, safety and environmental effects of our operations.
- Fully cooperate with environmental, health and safety training and with OUC's periodic compliance reviews of our products and operations.
- Follow our vehicle idling policy to reduce emissions and look for other ways to contribute to a cleaner environment and minimize waste, energy and use of natural resources.
- Contact the [Legal Department](#) if you have any questions about compliance with environmental, health and safety laws and policies.

[Vehicles Policy](#)



OUR COMMUNITY

CORPORATE STEWARDSHIP

We believe in making a positive difference in people's lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage and support a diverse range of corporate social responsibility activities. You are encouraged to get involved in the initiatives we support, *including volunteering*. **As an organization, we support a variety of charitable causes in accordance with our Customer Education and Outreach Expense Guidelines.**

We also encourage you to make a difference on a personal level, but ask that you do so on your own time and at your own expense, making sure that your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use OUC funds, assets or the OUC name to further your personal volunteer activities.



Customer Education and Outreach Expense



Community Service Organizations



Volunteer Program





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OUR COMPANY

OUC ASSETS

**CONFIDENTIAL INFORMATION AND
INTELLECTUAL PROPERTY**

ACCURATE RECORDKEEPING

COMMUNICATION WITH THE PUBLIC

SOCIAL MEDIA



OUR COMPANY

OUR ASSETS

We are entrusted with OUC's assets and are personally responsible for protecting them and using them with care. Our assets include funds, facilities, equipment, vehicles, supplies, materials, information systems, intellectual property and confidential information.

Personal use of OUC assets is discouraged, but if permitted (such as use of an OUC vehicle for driving to and from work), should be kept to a minimum and have no adverse effect on productivity and the work environment. If you have any questions as to whether such personal use of an OUC asset is permissible, please contact your immediate supervisor or manager or one of the other resources set out in this policy.



BE RELIABLY ETHICAL:

- Always access OUC facilities using approved electronic identification.
- Do not use OUC equipment or information systems to create, store or send content that others might find offensive.
- Do not share your passwords or allow other people, including friends and family, to use your OUC badge or OUC resources.
- Only use software that has been properly licensed and vetted through the OUC IT security screening process. The copying or use of unlicensed or "pirated" software on OUC computers or other equipment to conduct OUC business is strictly prohibited. If you have any questions about whether or not a particular use of software is secure and/or licensed, contact the [Digital & Technology Support Center](#).
- Some OUC equipment may be borrowed and used under Tool and Equipment Loan procedures.
- If you are authorized to use purchasing cards (P-cards), use them responsibly and for legitimate business purposes. Also retain all accompanying documentation like receipts and invoices.

STAY ALERT FOR:

- Requests to borrow or use OUC equipment without approval.
- Unknown individuals without proper credentials entering our facilities.
- Excessive use of OUC resources for personal purposes.



Personal Use of OUC Property Policy



Disposal of Surplus Property/ Waste Property



Identification Card Policy



Information Systems Security Policy



Intellectual Property Policy



Recreational Facilities



Public Use of OUC Meeting Facilities



Purchasing Policy



OUR COMPANY

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Through our work, OUC handles many different types of information, including confidential information and private and proprietary intellectual property belonging to OUC, our customers, business partners and other third parties. Any OUC employees who have access to this kind of information must know and follow any contractual confidentiality provisions related to such information as well as all applicable laws and requirements related to accessing, using, storing and disposing of it. Protecting confidential information and intellectual property is critical to our business and our ability to build trust and confidence.

Each of us must be vigilant and protect confidential information and intellectual property. This means keeping it secure, limiting access to those who have a need to know in order to do their jobs and only using it for authorized purposes. Be aware that the obligation to protect confidential information and intellectual property continues even after employment ends.

INTELLECTUAL PROPERTY:

Intellectual property (IP) is an important asset that must be protected. Examples of IP include:

- Business and marketing plans
- Initiatives (existing, planned, proposed or developing)
- Customer lists
- Trade secrets and discoveries
- Methods, know-how and techniques
- Innovations and designs
- Systems, software and technology
- Patents, trademarks and copyrights



Intellectual Property Policy



Public Records Policy



Records Management Policy

BE RELIABLY ETHICAL:

- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate confidential information using OUC-approved information systems.
- Protect any intellectual property or confidential information entrusted to us by our third parties.
- Be aware of requests for public records that contain confidential information. Records like these may be fully exempt from disclosure or may have exempt portions such that the document may be shared, but only after the exempt confidential information has been redacted. Seek guidance from the [Legal Department](#) on what types of information might be confidential and exempt from public records law. See [Accurate Recordkeeping](#) to learn more.

- Understand the expectations of customers and business partners regarding the protection, use and disclosure of the confidential information that they provide to us.
- Limit any access to third-party confidential information to those persons who have a need to know in order to do their jobs, and only for authorized purposes.
- Immediately report any loss or theft of confidential information to your immediate supervisor or manager.

STAY ALERT FOR:

- Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.
- Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.
- Discussions of confidential information in places where others might be able to overhear – for example on planes and elevators and when using mobile phones.
- Sending confidential information to unintended parties, general/global email accounts or unattended fax machines or printers.



OUR COMPANY

ACCURATE RECORDKEEPING

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and to supporting bondholders, regulators and others. Our reports and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure reports or disclosures about our financial records are full, fair, accurate, complete, objective and timely – and never falsify, misrepresent, mischaracterize or omit any report, record, account, entry or transaction that relates to OUC.

RECORDS MANAGEMENT:

Documents, whether physical or electronic, should only be disposed of in compliance with OUC's Records Management Policy. Records should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. You must read and follow the instructions given on any notice of litigation hold notice you receive from the Legal Department. Never destroy documents in response to – or in anticipation of – a lawsuit, an investigation or audit.

If you have any questions or concerns about retaining or disposing OUC records, please contact the [Legal Department](#).

SPOTLIGHT ON INTEGRITY

→ **At the end of the last quarter reporting period, my Manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.**

No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was, therefore, a misrepresentation and, depending on the circumstances, could amount to fraud.

PUBLIC RECORDS:

OUC is committed to complying with laws that provide a right to access public records. As defined in Section 119.011(12), Florida Statutes, all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business of OUC are considered public records unless specifically exempt by law.

If you receive a request for a copy of one of OUC's public records, immediately follow the specific steps set forth in detail in OUC's Public Records Policy which contains, among others, the details for Immediate Acknowledgment and Response procedures.

Remember: Everyone at OUC contributes to the process of recording business results and maintaining records. Whether you are filing an expense report, preparing a financial statement or simply completing a time sheet, be honest, accurate and complete.

BE RELIABLY ETHICAL:

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. Write with the knowledge that the records you create may become public documents.
- Follow our Records Retention Schedule for all records – both physical and electronic – to properly manage OUC business records.

STAY ALERT FOR:

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets or liabilities.
- Improper destruction of documents.
- Failure to timely and properly respond to requests for public records.



Records Management Policy



Public Records Policy



OUR COMPANY

COMMUNICATION WITH THE PUBLIC

We are committed to maintaining honest, professional and lawful internal and public communications. This commitment includes compliance with laws, which requires transparency and disclosure in our business dealings and records, meetings and other official actions.

As an organization, we also need a consistent voice when making disclosures or providing information to the public. For this reason, it is important that only authorized persons speak on behalf of OUC. Communications with media should be referred to executive management.

FULL, FAIR AND TIMELY DISCUSSIONS:

OUC is committed to meeting its obligations of full, fair and timely disclosure in all reports and documents that describe our business and financial results and public records requests. See [Accurate Recordkeeping](#) to learn more about how to comply.

BE RELIABLY ETHICAL:

- Follow our policies when creating and retaining records that will be made available to the public or the media.
- Follow our policies to timely and properly respond to any requests for public records.

STAY ALERT FOR:

- Giving public speeches or interviews, writing articles for professional journals or other public communications that relate to OUC without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for OUC without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about OUC or its customers or business partners.



Communications



News Items



OUC Representation

SPOTLIGHT ON INTEGRITY

→ **A reporter approached me while I was working and wanted to ask me questions about another OUC employee. I told them the OUC Media Policy is to have any media requests handled by our Media Relations department.**

That was the right thing to do. Media Relations will fact check and verify any information given to the media to ensure that OUC is consistently providing timely and accurate data to media outlets.

If you approached by the media, please refer them to **407.434.2250** or **mediarelations@ouc.com**.





OUR COMPANY

SOCIAL MEDIA

OUC frequently engages with its customers, employees and community via social media channels. These channels provide an opportunity for OUC to market to and educate customers, as well as welcome feedback. OUC also understands that its employees use social media in their personal lives.

For the purpose of this Code of Ethics and Business Conduct, social media refers to any and all social networks including (but not limited to) Facebook, Instagram, Flickr, Twitter, MySpace, LinkedIn, Lync, multimedia, wikis and blogs for personal and business use. Social media is dynamic; therefore, this list is not all-inclusive. On the platforms noted here and on other forms of social media – including new forms that will be introduced in the future – employees must comply with standards noted on this page.



BE RELIABLY ETHICAL:

- Ensure there is a distinction between sharing personal information, views or opinions and those of OUC.
- Use the title on your OUC job description when listing your job history and current role on social media sites.
- Before posting online or on social media, consider who might see it and how it could be perceived now and in the future.
- If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of OUC.
- If you believe a false statement about OUC has been posted, do not post or share confidential information, even if your intent is to “set the record straight.” Instead, contact communications@ouc.com.
- Using social media during work time or on OUC-issued equipment is not permitted, unless is it work-related, as authorized by your management.
- When creating a social media account, use only your personal email address.



STAY ALERT FOR:

- Creating content that may pose a risk to the safety of yourself or fellow OUC employees.
- Postings that include discriminatory remarks, harassment or threats of violence.
- Odd connection requests. Stay skeptical and only accept requests if you can verify the requestor.
- Attempts to encourage you to click malicious links.



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OUR RELATIONSHIPS

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OUR RELATIONSHIPS

SUPPLIER RELATIONS

OUC is committed to honesty, integrity and fairness in conducting business with suppliers. Employees are required to comply with OUC's policies to avoid any activities that may create a conflict of interest or jeopardize the highest standards of professional conduct during all phases of the procurement, contracting and sourcing processes.

BE RELIABLY ETHICAL:

- OUC employees may not solicit gifts, gratuities, services or other items of monetary value from any person or company to whom a purchase or contract may be awarded.
- An OUC employee who is related to a bidder or a proposed provider of goods or services, or is in a position to derive a personal benefit from the transaction, must disclose the relationship pursuant to law and OUC policies and may not serve on a selection committee involving such bidder or provider.
- OUC and certain OUC employees that exercise the authority to approve purchases are governed by Florida Statutes, Chapter 112, Part III, on ethics of public employees and the applicable requirements in such laws must be followed.

STAY ALERT FOR:

- Employees and purchasing staff involved in the procurement process are required to complete Conflict of Interest Forms and to update such forms when any changes in relationships occur that may create a conflict with a proposed or existing bidder or vendor. New employees shall not participate in the procurement process with a bidder or vendor by whom such employee was employed in the six-month period preceding their hire at OUC.



Procurement Policy

HONEST AND FAIR DEALING

We treat our customers and business partners fairly. We work to understand and meet their needs, while always remaining true to our company's ethical standards. We tell the truth about our services and capabilities and never make promises we can't keep.

In short, we treat our customers and business partners as we would like to be treated.

BE RELIABLY ETHICAL:

- Treat each customer fairly and honestly.
- Speak up and talk to your Manager if you have concerns about any error, omission, misrepresentation, undue delay or defect in quality or our customer service.
- Promptly raise with a Manager any potential conflict of interest involving you, our customers or OUC.
- Never follow a customer's request to do something that you regard as unethical or unlawful.
- Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.

STAY ALERT FOR:

- Pressure from colleagues or Managers to cut corners on quality or delivery standards.
- Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.





OUR RELATIONSHIPS

WORKING WITH THE GOVERNMENT

We are committed to meeting the many special legal, regulatory and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoices, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing, emergency response and other matters. These requirements may also flow down to individuals and companies working on our behalf. Make sure you know and follow the laws, regulations, our Code and OUC policies as they relate to government-related work.

[Procurement Policy](#)[Public Records Policy](#)

CONFLICTS OF INTEREST

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of OUC. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your Manager so that we can properly evaluate, monitor and manage them.

The State's Code of Ethics for Public Officers, Florida Statutes, Chapter 112, Part III, prohibits certain actions or conduct of the OUC Commissioners, General Manager and Chief Executive Officer, Purchasing Agent, and employees involved in the procurement of goods and services.

BE RELIABLY ETHICAL:

- Avoid conflict-of-interest situations.
- Always make business decisions in the best interest of OUC.
- Complete annual conflict-of-interest certifications.
- Discuss with your Manager full details of any situation that could be perceived as a potential conflict of interest.
- Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with OUC.
- Complete and file annual Form 1 financial disclosures (if applicable to you).





OUR RELATIONSHIPS

Be alert to situations, including the following, which are common examples of potential conflicts of interest.

DISCLOSURE OR USE OF INFORMATION:

No OUC Commissioner or employee shall disclose or use information gained by reason of their official position for personal gain or benefit or for the unintended gain or benefit of any other person or business entity.

RELATIVES:

Employment of relatives will not be permitted where there is a business necessity for prohibiting such a relationship.

Relatives may not be employed or retained under the following circumstances:

- If an individual is employed in any organizational unit where either he or she would have direct or indirect line authority over a relative, or where a relative would have any direct or indirect line authority over the individual.
- If OUC determines that business necessity requires it to prohibit relative from being employed in any capacity.

CONFLICTS OF INTEREST:

No OUC Commissioner or employee shall be directly or indirectly employed by any person or business entity, nor have a direct or indirect financial interest in any firm or corporation which:

- Has, or proposes to have, any contractual relationship with OUC.
- Renders or proposes to render, for any consideration or services to OUC.
- Is subject to the regulation of OUC.

[Relatives Policy](#)[Outside Employment](#)

When the approval, decision, recommendation or advice shall be sought, obtained or required in connection with such contract, service, or regulation (Sec. 2, Chap. 31080, Laws of FL, 1955) [Also covered by F.S. 112.313(7)]. Commissioners and employees shall have no relationship with suppliers, contractors, consultants, customers, or regulators that creates a conflict of interest, or even appears to impair their independent judgment related to their OUC responsibilities.

PERSONAL INVESTMENTS:

A conflict can occur if you have ownership or other financial interest in a competitor, vendor, supplier or customer. Make sure you know what's permitted – and what's not – by our policies and seek help with any questions.

CIVIC ACTIVITIES:

Unless OUC management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, suppliers, customers or partners, especially if your current job gives you the ability to influence our relationship with them.

OUTSIDE EMPLOYMENT:

OUC recognizes that employees may seek outside employment to supplement their income or pursue projects outside of their primary occupation. Employees must avoid outside employment which creates a conflict of interest. Review the policy to know what's permitted.





OUR RELATIONSHIPS

GIFTS AND ENTERTAINMENT

OUC has established high standards of moral action, conduct, and motive for all of its Commissioners and employees. These standards include the characteristics and values that the general public would expect from OUC – such as, being honest, acting with integrity, being fair, respecting others, being accountable for their actions, and being committed to excellence.

The State's Code of Ethics for Public Officers, Florida Statutes, Chapter 112, Part III, prohibits certain actions or conduct of the OUC Commissioners, General Manager and Chief Executive Officer, Purchasing Agent, and employees involved in the procurement of goods and services.

OUC will follow state ethical guidelines with respect to any receipt of gratuities from inappropriate sources.

Gratuity is defined as any gift, favor, reward, loan, meal, or other item(s) of monetary value tendered to an employee or public officer by any source other than OUC.



Gifts & Entertainment Policy

SPOTLIGHT ON INTEGRITY

→ **When traveling, I received a gift from a business partner that I believe was excessive. What should I do?**

You need to let your Manager, Internal Audit, Legal or Human Resources (HR) know as soon as possible. We may need to return the gift with a letter explaining our policy.

KNOW THE RULES:

- No Commissioner or OUC employee shall solicit directly or indirectly any gratuity or other personal benefit, regardless of value, from any person.
- No Commissioner or OUC employee shall accept directly or indirectly any gratuity or other personal benefit, regardless of value, which is offered based upon any understanding, or under circumstances that would reasonably indicate that the vote, official action, or judgment of the public officer or employee would be influenced thereby.
- No Commissioner or OUC employee may accept a gratuity or other personal benefit valued in excess of \$100 from any person (other than a relative) or business with whom the Commissioner or employee currently or regularly contracts or otherwise conducts business in their OUC capacity, or with respect to whom the Commissioner or employee is currently making decisions or regularly makes decisions affecting their business, property, or personal interests.



STAY ALERT FOR:

- Situations that could embarrass you or OUC, including entertainment at sexually oriented establishments.
- Gifts, favors or entertainment that may be reasonable for a privately owned customer but not for a government official or agency.

→ **During contract negotiations with a potential new supplier, the new supplier mentioned that they had a complimentary registration to a local business seminar. They are unable to attend and asked if I would like to go in their place. What should I do?**

You should decline the offer. If you are involved in contract negotiations, you must never accept any gifts while the negotiation process is ongoing. Accepting gifts during negotiations can give the appearance of something improper and is always inappropriate.



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OUR RESPONSIBILITY

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OUR RESPONSIBILITY

COOPERATION WITH INVESTIGATIONS AND AUDITS

All employees are expected to fully cooperate with internal and external investigations and audits that are conducted by OUC, or on our behalf. You are expected to fully cooperate and ensure that any information you provide is true, accurate and complete. Being untruthful in an investigation can lead to discipline, up to and including termination. If you learn of a potential government investigation or inquiry, immediately notify your Manager, Internal Audit, Legal or Human Resources (ER) before taking or promising any action.

STAY ALERT FOR:

- **Falsified information.** Never destroy, alter or conceal any document in anticipation of or in response to a request for these documents.
- **Unlawful influence.** Never provide or attempt to influence others to provide incomplete, false or misleading statements to an OUC or government investigator.
- **Interference in an investigation.** We have formal controls in place to prevent those who review and investigate hotline reports (Human Resources, the Legal Department and Internal Audit) from interfering with an investigation or engaging in retaliation.
- **Lie by Omission.** Never leave an important fact out in order to foster a misconception.

DATA PRIVACY

We respect the personal information of others. Follow our policies and all applicable laws in collecting, accessing, using, storing, sharing and disposing of sensitive information. Only use it for legitimate business purposes.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number or credit card number.

PRIVACY AND HIPAA:

OUC complies with laws such as the Health Insurance Portability and Accountability Act (HIPAA), which protects the privacy of personally identifiable information (PII) and protected health information (PHI). If your job involves handling PHI or PII, collect only the minimum needed to perform your work and use it only for legitimate business purposes.

- PII is information that can be used to trace someone's identity or can be combined with other personal information to do so (for example, a name, address, social security number, driver's license number or account number).
- PHI is a specific type of personal information that identifies an individual and relates to a person's physical or mental health, treatment or payment for health care.

STAY ALERT FOR:

- Sending sensitive information to unattended fax machines or printers or storing it on unsecured devices, such as personal cell phones, laptops or USB drives.
- Failing to shred or securely dispose of sensitive information.
- Sharing healthcare-related information of others.
- Using "free" or individually purchased internet hosting, collaboration or cloud services.

[HIPAA Policy](#)



OUR RESPONSIBILITY

INSIDER TRADING

In the course of business, you may learn confidential information about publicly traded companies that is not available to the public at large. Trading securities while aware of such material, nonpublic information or disclosing such information to others who then trade (“tipping”), is prohibited by various laws.

MATERIAL INFORMATION:

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- A proposed acquisition or sale of a business.
- A significant expansion or cutback of operations.
- A significant product development or important information about a product.
- Extraordinary management or business developments.
- Changes in strategic direction, such as entering new markets.



BE RELIABLY ETHICAL:

- Do not buy or sell securities of any company when you have material nonpublic information about that company.
- Protect material nonpublic information from the general public, including information in both electronic form and in paper copy.
- Discuss any questions or concerns about insider trading with the [Legal Department](#).

STAY ALERT FOR:

- Requests from friends or family for information about companies that we do business with or have confidential information about. Even casual conversations could be viewed as illegal “tipping” of inside information.
- Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for OUC-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered “tipping” and is against the law regardless of whether you benefit from the



Insider Trading Policy



OUR RESPONSIBILITY

ANTI-CORRUPTION AND BRIBERY

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. OUC is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents OUC. If such a situation arises, you should immediately report the situation to Internal Audit or Legal.

KEY DEFINITIONS: BRIBERY, CORRUPTION AND FACILITATION PAYMENTS

Bribery means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all third parties, including suppliers, consultants and vendors who work on OUC's behalf, particularly when dealing in countries with high corruption rates and in any situations where "red flags" would indicate further screening is needed before retaining the third party. Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

BE RELIABLY ETHICAL:

- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Understand the standards set forth under anti-bribery laws which apply to your role at OUC.
- Accurately and completely record all payments to third parties.

STAY ALERT FOR:

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with OUC clearly documented in writing.

 **Anti-Corruption and
Bribery Policy**





OUR RESPONSIBILITY

ANTITRUST AND FAIR COMPETITION

We believe in free and open competition and never engage in improper practices that may limit competition. We never look to gain competitive advantages through unethical or illegal business practices.

Antitrust laws are complex and compliance requirements can vary depending on the circumstances, but in general, the following activities are red flags and should be avoided and, if detected, reported to Internal Audit or Legal.

- Sharing OUC's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- Sharing information in industry working groups or associations that could be considered anti-competitive, such as price setting for services or allocating market share.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

BE RELIABLY ETHICAL:

- Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers or markets.
- Do not engage in conversations with competitors about competitively sensitive information.

SPOTLIGHT ON INTEGRITY

→ I received sensitive pricing information from one of our competitors. What should I do?

You should contact Internal Audit or Legal without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-by-case basis and may include sending a letter to the competitor.

STAY ALERT FOR:

- **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages or allocations of markets.
- **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting noncompetitive bids.
- **Tying** – when a company with market power forces customers to agree to services or products that they do not want or need.
- **Predatory pricing** – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

Antitrust and Fair Competition Policy

ANTI-MONEY LAUNDERING

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose OUC and the individuals involved to severe sanctions. Report any suspicious financial transactions and activities to Internal Audit or Legal and, if required, to appropriate government agencies.

Anti-Money Laundering Policy





OUR RESPONSIBILITY

POLITICAL ACTIVITIES

You have the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views, expressions and actions are not those of OUC, and never use OUC funds for any political purpose.

BE RELIABLY ETHICAL:

- Ensure that your personal political views and activities are not viewed as those of OUC, nor violate the Code.
- Do not use our resources or facilities to support your personal political activities.

STAY ALERT FOR:

- **Lobbying** – Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the Legislative and Regulatory Compliance business areas.
- **Pressure** – Never apply direct or indirect pressure on another employee to contribute to, support or oppose any political candidate or party.
- **Improper influence** – Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- **Conflicts of interest** – Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at OUC.
- **Sponsorships and Donations** – Be aware of legal and policy requirements before committing to any sponsorships, donations, either monetary or in-kind services.



[Political Activity Policy](#)



SPOTLIGHT ON INTEGRITY

→ **I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at OUC as long as I don't use any OUC funds or resources?**

No. It would be improper to associate our name in any way with your personal political activities.

→ **I would like to invite an elected official to speak at an upcoming OUC event. Would that be a problem?**

You must get approval from our Community Engagement and Legislative and Regulatory Compliance areas before inviting an elected official or other government official to attend an OUC event. If the invitee is in the midst of a reelection campaign, the event could be viewed as support for the campaign. Depending on local laws, any food, drink or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.



MAKING YOUR COMMITMENT

At OUC, we believe in following all applicable laws and regulations. All OUC employees must complete and submit this Acknowledgement Form annually and participate in all required ethics and compliance training.

The undersigned hereby acknowledges and states that the undersigned has read and understands OUC's Code of Ethics and Business Conduct. Furthermore, the undersigned hereby acknowledges and states that the undersigned shall comply at all times with OUC's Code of Ethics and Business Conduct (as amended from time to time).

SIGNATURE: _____

DATE: _____





POLICY INDEX

The following is a list of policies and other resources referenced in the Code.
Note that this is not an exhaustive list of OUC's policies.



[Alcohol and Drug Policy](#)
[Anti-Corruption and Bribery Policy](#)
[Anti-Money Laundering Policy](#)
[Antitrust and Fair Competition Policy](#)
[Customer Education and Outreach Expense Guidelines](#)
[Drug & Alcohol Free Workplace Policy](#)
[HIPAA Policy](#)
[Identification Card Policy](#)
[Information Systems Security Policy](#)
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[Public Records Policy](#)
[Records Management Policy](#)
[Relatives Policy](#)
[Safety Policy](#)
[Security Policy](#)
[Vehicle Safety Policy](#)
[Workplace Violence Policy](#)



HELPFUL RESOURCES

HUMAN RESOURCES

Human Resources-Employee Relations

HR-EmployeeRelations@ouc.com

INTERNAL AUDIT

internalaudit@ouc.com

OUC REPORT LINE

Call 1.833.310.0010 or visit www.oucreportline.com

Report Line Reference Guide

http://oucweb/oucdocs/report_line/Report_Line_Reference_Guide.pdf

THE LEGAL DEPARTMENT

legal@ouc.com

THE SAFETY DEPARTMENT

SafetyDepartment@ouc.com

CORPORATE COMMUNICATIONS

communications@ouc.com

MEDIA RELATIONS

mediarelations@ouc.com

407.434.2250

COMMUNITY ENGAGEMENT

communityengagement@ouc.com

