



Code of

**Entegrity**



## Introduction

Each and every one of us contributes to Entergy's culture of integrity as we conduct our work consistently with Entergy's core values.

The Code of Entegrity applies to all of us, regardless of our role and level at Entergy, and is our overall guide to ethical behavior and compliance excellence. The Code references various system policies that deal with specific topics in greater detail. For more information please read the relevant full policy on myEntergy.<sup>1</sup>

<sup>1</sup> The Code of Entegrity applies to employees of any subsidiary or affiliate company of Entergy Corporation (each an "Entergy System Company" and collectively in this document "Entergy").



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# Introductory letter from **Chairman of the Board and CEO**

Our Code of Entegrity is not just a set of rules – it's the embodiment of our collective commitment to ethical conduct, fair business practices and steadfast integrity. These principles guide us along our path to becoming the premier utility.

In every interaction – be it with our customers, employees, communities or owners – we prioritize honesty and transparency. We are united in enhancing our customers' lives and continually surpassing their expectations.

This commitment extends to our endeavors in environmental sustainability and our

evolving work culture that champions diversity, inclusion and belonging.

Our core values – which underpin every action we take – are safety, teamwork, always learning, integrity and respect.

These are the principles that guide how we work and live every day. They define our uncompromising pledge to make ethical decisions, even when it's tough, and to comply with all laws, regulations and policies. And if you are ever concerned that something isn't legal, compliant, or just feels off, I encourage you to speak up without fear of retaliation.



**Drew Marsh**

Chairman of the Board and Chief Executive Officer

Our culture of integrity is critical to creating an inclusive workplace, safeguarding our assets and delivering safe, reliable energy to our customers. It's what drives us to power life today and for future generations.

I am profoundly privileged to lead a company that exemplifies these principles every day.

A handwritten signature in black ink that reads "Drew Marsh". The signature is fluid and cursive, written in a professional style.

**Drew Marsh**

Chairman of the Board and Chief Executive Officer

## Entergy Values

**Safety**

**Teamwork**

**Always learning**

**Integrity**

**Respect**





# Our expectations

To accelerate our Path to Premier, we have adopted a new set of expectations for all employees regardless of level or business function.

Our expectations define how we compete, operate and deliver outcomes for our stakeholders. The objective is to involve all employees in continuously driving performance improvement and innovation for customer success.

Each of us must proactively learn about these new expectations and apply them to our daily work. Adopting these behaviors will build a stronger culture of integrity and keep us on our path to becoming the premier utility.

## Our expectations

## How our expectations look in practice

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### Make customers more successful

- We expand our knowledge of external customers and their goals.
- We use our understanding of external customer input and feedback to achieve their outcomes.

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### Innovate and continuously improve

- We prioritize innovation and continuous improvement initiatives with visible sponsorship from leaders.
- We are encouraged to try new things and lead innovation, benchmarking and improvement initiatives.

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### Collaborate and share knowledge

- We collaborate and share knowledge across boundaries and quickly apply learnings and best practices.
- We regularly discuss our strategy, goals and priorities, and we are involved in how we achieve results.

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### Be accountable for results

- We embrace challenging performance goals for continuous learning and performance improvement.
- We are accountable for results and the measurement of performance is transparent.

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### Recognize and reward outcomes

- We have non-financial rewards and recognition to encourage high performance and results.
- We have financial incentives to motivate and drive achievement of outcomes.

# We Lead with **Entegrity**

## What is Entegrity?

Entegrity is the practice of being honest and showing a consistent and uncompromising commitment to strong moral and ethical principles and to excellence in following the rules and regulations that govern our important work.





# Responsibilities

## Shared Responsibilities

We all share responsibilities for upholding our reputation for good and fair corporate behavior. Follow the letter and spirit of our Code and system policies, applicable laws, rules and regulations, and always observe the highest ethical and legal standards.

We cannot assist others in breaking the law. We must conduct ourselves with Entegrity in accordance with this Code, as well as its underlying policies.

As employees, we take personal responsibility for:

- Speaking up, listening and following up.
- Treating others with respect.
- Knowing the Code and system policies related to our work.
- Helping uphold the Code and system policies.

- Promptly reporting known, suspected or potential violations of this Code or system policies in accordance with the Reporting Violations policy.
- Cooperating with investigations and audits, and providing forthright responses.
- Completing compliance training and other requirements.

## Leader Responsibilities

In addition to the responsibilities of all employees, those in leadership positions have an obligation to lead by example and to provide direction, guidance and encouragement to those whom they lead.

Leaders must:

- Build trust and create an inclusive environment that helps employees feel safe when sharing ideas and concerns.

- Work with the Ethics and Compliance department to ensure that employees for which the supervisor is responsible are aware of the Code and system policies, and ensure they complete required compliance training.
- Work with appropriate personnel to promptly address and respond to compliance issues raised by or concerning employees, consultants, suppliers or agents.
- Take appropriate and timely action, through reporting, discipline or other appropriate measures, to address known or suspected violations by employees.
- Prohibit retaliation against those who speak up.
- Admit mistakes or uncertainty, and seek guidance.

# The Ethics and **Compliance Department**

If you have any questions regarding the Code of Entegrity or any of the topics herein, please contact the Ethics & Compliance Department at [ethics@entergy.com](mailto:ethics@entergy.com)

The mission of the Ethics and Compliance department is to lead an ethics and compliance program that is designed to:

- Promote and foster an organizational culture of integrity, ethical decision-making and commitment to Entergy's values.
- Assure that directors, officers and employees conduct business with the highest standards of integrity and in compliance with all applicable laws, regulations and Entergy system policies.
- Provide employees a haven for reporting concerns.

# The Ethical Decision-Making Model

This Code addresses many topics, and our System policies go into even greater detail. But this Code and our compliance program cannot specifically address or cover all situations. And even when a topic is addressed, the proper response may not be obvious. There are various ways to answer ethical questions and solve problems. Give these steps a try:



## Reporting Violations

If you become aware of a violation, you have a duty to report it, even if reporting feels difficult. Reporting violations takes courage, but it helps everyone who has an interest in Entergy's success.

Employees, agents and contractors must report known, suspected or potential violations of law or system policies.

- In the event of violence or imminent danger to the safety or security of persons or property, call law enforcement (911) immediately, and report the matter to the Ethics Line as soon as possible. If potential workplace violence or security concerns do not involve imminent danger, report the matter to the Ethics Line.
- Known, suspected or potential violations of law, such as harassment, discrimination, fraud, financial reporting concerns, and violations of safety or environmental laws and regulations must be reported to the Ethics Line.
- Nuclear employees, agents and contractors shall immediately report other known, suspected or potential violations of the law or policies via nuclear site protocols as defined

by nuclear business unit policies (immediate supervisor, Corrective Action process, Open Door policy or Employee Concerns Program), by one of the methods outlined in the *Should I Call the Ethics Line?* - Decision Tool, or via the Ethics Line. Employees, agents and contractors also have the right, protected by law, to report nuclear safety concerns directly to the Nuclear Regulatory Commission.

- Report all other known, suspected or potential violations of system policies through one of the methods outlined in the *Should I Call the Ethics Line?* - Decision Tool or the Ethics Line.

Anyone having a reasonable belief of the existence of a known, suspected or potential violation of the law, the Code or any system policy must report the violation, even if he or she is not involved in the violation in any way.

Employees who have been involuntarily terminated, due to anything other than a layoff, including inadequate performance or attendance, misconduct, and violation of company policy or procedure, are not eligible to be rehired.

**Relevant Policies:** [Reporting Violations](#)

### The Entergy Ethics Line

We take concerns seriously. The Ethics Line is staffed 24 hours a day by an outside company. Entergy employees and others may contact the Ethics Line by phone or online.

**Call: 1-888-257-ETHIC (1-888-257-3844)**

**Visit:** [www.compliance-helpline.com/entergyethicsline.jsp](http://www.compliance-helpline.com/entergyethicsline.jsp)

People contacting the Ethics Line do not have to identify themselves. Once a concern is submitted, a case number and a personal identification number will be provided for follow-up.

All matters reported to the Entergy Ethics Line will be appropriately reviewed.

### *Should I Call the Ethics Line?* Decision Tool

The *Should I Call the Ethics Line? – Decision Tool (ELDT)* was developed to assist you in finding the best company resources to discuss and report such issues. The ELDT addresses a wide variety of concerns, including safety, security, fraud, phishing, performance, and potential violations of law, regulation or policy. Information is tailored for nuclear, utility and corporate employees.

### Zero Tolerance for Retaliation

Entergy does not tolerate retaliation and will take appropriate action to correct any known retaliation. This may include disciplinary action, up to and including immediate termination of employment, against the retaliator.

Contact the Ethics Line if you feel that you or another employee are being retaliated against for making a good faith report based on reasonable belief of wrongdoing or participating in an investigation of a complaint.

Sometimes a report of a violation turns out to be wrong – there was no violation. But this must not prevent us from making a good faith report. If you have reasonable belief that a violation has occurred, system policy prohibits you from being disciplined for raising the concern.

**Relevant Policies:** [Reporting Violations](#)

## Why should I report potential wrongdoing?



### It's the right thing to do

It's our personal ethical obligation even beyond rules and regulations.



### It helps prevent wrongdoing

Most of us do our best to act ethically and with compliance excellence at all times. When we know others will hold us accountable for committing misconduct, we are less likely to commit wrongdoing and will act to determine the right course of action.



### It protects our company

By identifying potential threats and risks we can put an end to any actual violations and try to prevent new ones from happening. Speaking up can also help to prevent potential fines and lawsuits.



### It provides more detailed insight into issues

Reporting concerns can provide the crucial information or examples that management needs to piece together the precise picture, and then develop the appropriate response.



### It takes the burden off of you

Reporting actual, suspected, or potential violations of laws and System policies means that you don't have to decide which policy may be being violated and how best to address the situation.



### It drives better communication and trust

A culture of integrity and a willingness to speak up, even when it's hard, creates a better environment and culture of inclusion and belonging for everyone.

# We Care About Our Workplace

The workplace is more than a physical space. It's an environment in which we work that encompasses places, people and processes. We are committed to upholding a diverse and inclusive environment that promotes belonging, health and safety in all we do.

## Health and Safety

Entergy is dedicated to becoming the premier utility, and we are consistently an industry leader in safety and occupational health performance. We focus on proactively, responsibly and sustainably managing our business operations to protect our employees, contract partners, customers and the communities in which we serve. We believe individuals have a right to safe and healthy working conditions, and we are committed to providing a safe, secure, healthy and productive work environment. You are expected to maintain safe and healthy working conditions, comply with the safety standards of your job and report actual or potential safety or health hazards.

**Relevant Policies:** [Environmental](#), [Occupational Health & Safety](#), [No Smoking](#)

## Our guiding safety principles

1. I own safety
2. Prevention is critical
3. We must always improve
4. Zero harm is possible



## Diversity, Inclusion and Belonging

We're focused on taking the necessary steps to create an inclusive culture, eliminate unconscious bias and foster an environment of belonging. We are committed to developing and retaining a workforce that reflects the rich diversity of the communities we serve. The diversity of employee ideas, backgrounds, perspectives, abilities, skills and knowledge enables us to create innovative business and customer solutions. To ensure that we fully realize the potential of our diverse workforce, we are also focused on creating and nurturing a culture of belonging, with the goal of assuring that all employees feel valued, heard and respected. A powerful and dynamic culture retains top talent, provides an environment for more engaged employees, and empowers our workforce to deliver on customer-centric opportunities and continuous improvement to create further sustainable value for all our stakeholders.

### Relevant Entergy Documents:

[Diversity & Inclusion Vision and Mission Statements](#)

Entergy has multiple employee resource groups that promote inclusivity and collaboration among employees from different generations, genders, cultural backgrounds and professional experiences.



### Discrimination and Harassment Prevention

We seek to maintain a work environment that recognizes the dignity and worth of each individual and is free from harassment and discrimination based on:

- Protected characteristics, including race, color, sex, religion, pregnancy condition, national origin, age (40 and over), sexual orientation, gender identity and/or expression, veteran’s status, marital status, qualified disability, genetic information (which includes

family medical history), and or any other characteristic protected by law.

- Protected activities, including the “good faith” filing of a claim with the Equal Employment Opportunity Commission or another governmental entity.

Examples of prohibited conduct when based on a protected characteristic or a protected activity include, but are not limited to:

- Denying equal employment opportunities.

- Making, transmitting, intentionally accessing, displaying or circulating offensive or derogatory statements, comments, jokes, slurs, gestures, pictures, emails or links.
- Creating an offensive, hostile or intimidating work environment.
- Engaging in unwelcome flirtation, sexual advances, requests for sexual favors, propositions, touching and other verbal or physical conduct of a sexual nature.

The Discrimination and Harassment Prevention policy is intended to extend further than the law to maintain a work environment that is inclusive for all employees. It prohibits behavior that, if left unchecked, could become unlawful or undermine a safe, productive or collaborative work environment. It also prohibits conduct, whether occurring during or outside of working time, that could cause reputational harm to Entergy or could be negatively associated with Entergy, such as inflammatory or divisive statements posted on social media.

You should immediately report known, suspected or potential violations of this policy to the Entergy Ethics Line.

**Relevant Policies:** [Communications Systems, Discrimination & Harassment Prevention, Employee Use of Internal or External Social Media Sites](#)

### Drugs and Alcohol

You are required to be fit for duty when reporting to work.

The use, possession, promotion, sale, distribution and act of being under the

influence of illegal drugs or alcohol\* is prohibited while:

- On Entergy premises (including in a personal vehicle).
- Operating a vehicle or other equipment owned or leased by an Entergy system company.
- Operating a personal vehicle on Entergy system company business.
- Using property owned or leased by an Entergy system company.
- Working (including remotely).
- Otherwise conducting company business.

*\*Note: The use, possession or sale of alcoholic beverages is not prohibited where there is prior approval by authorized personnel. (e.g., an Entergy event).*

If you are taking prescribed or over-the-counter drugs that affect your ability to perform some or all job duties or to perform job duties safely, you must advise your supervisor about:

- Side-effects of the medication affecting your ability to perform existing job duties or on-the-job safety.
- Job duties affected.
- Any safety concerns.

To the extent allowed by applicable law or policy, employees may be required to submit to drug and alcohol screenings.

### Substance Abuse Assistance

You are encouraged to seek assistance from the Employee Assistance Program (EAP) for any issues relating to drugs and/or alcohol. The EAP is available for employees to use on a confidential basis.

**Relevant Policies:** [Drugs & Alcohol](#)

## Physical Security

### Weapons and Workplace Violence Prevention

We are committed to a work environment free from violence and threats. Any threat or act that would create fear, hostility, intimidation or concern of harm in another person is forbidden.

If violence is occurring or imminent danger exists, do not place yourself in harm's way. Call law enforcement (911) immediately. Then, as soon as possible, report the matter to the Ethics Line.

If there's no imminent danger, but direct or implied threats are occurring or other workplace violence issues exist, contact the Ethics Line.

Weapons are prohibited in the workplace unless authorized by system policy. Weapons include, but are not limited to:

- Guns, BB guns, automatic weapons, ammunition, bows, arrows, tasers/stun guns, mace spray\*, pepper spray\* and any type of explosive.

*\*Note: An employee may carry a legally possessed container of mace or pepper spray to be used for self-defense purposes only, provided that the capacity does not exceed 150 cubic centimeters (150 cc).*

### Securing Our Assets

We are all responsible for protecting company property from theft, fraud, unauthorized access and use, damage and destruction. Unauthorized or improper

use of company material, time, equipment, credit cards, procurement cards or other property is prohibited. You must not offer company property, company loans or unpaid company services to persons outside the company without prior written approval of senior management. All company property must be returned to the company at the termination of employment. Always report any theft or vandalism of company property.

**Relevant Policies:** [Bank Accounts](#), [Business Continuity Planning](#), [Enterprise Security](#), [Investment Recovery](#), [Protection of Company Property](#), [Real Estate](#), [Transportation](#), [Workplace Violence Prevention & Weapons](#)

# Information Security

## Protection of Information

### Do this...

- Use caution when discussing confidential employee information.
- Protect personnel files, performance evaluations, salary levels, medical data and other information pertaining to individuals and their employment with Entergy.
- Protect social security numbers, customer credit and bank information and usage data.
- Prevent the misuse, theft and improper disclosure of company information.
- Take care in handling, discussing, transmitting, storing and destroying company information.
- Follow the company's Protection of Information policy.
- Report concerns about protected employee information.

### ... Not this

- Disclose confidential employee information to unauthorized individuals.
- Disclose company information to parties who are not authorized to receive it and who do not have an Entergy-business need to know.
- Use or access customer information unless authorized for Entergy business.



### Employee Information

We must protect employee information. Employee records include:

- Personnel files.
- Performance evaluations.
- Salary levels.
- Medical data.
- Other information pertaining to individuals and their employment.

These records may only be accessed by or disclosed to individuals having a legitimate business reason to review the information contained in those records.

### Customer Information

We must also protect confidential customer information, such as social security numbers, credit card and bank account information, and usage data.

None of us may use or access customer information except for legitimate business purposes, in accordance with the law, the company’s Privacy policy, and the Protection of Information policy.

### Company Information

We must prevent the misuse, theft or improper disclosure of company information. Information that is used to provide customer service, carry out operations and report accurate data is an essential company asset and must be protected.

We must take care in handling, discussing, transmitting, storing and destroying information according to the rules set forth in the Protection of Information policy. We must protect such information against disclosure, either accidental or intentional, to parties, both inside and outside of Entergy, who do not have a legitimate business “need to know.” This obligation continues even when we are no longer employed by Entergy.

**Relevant Policies:** [Disclosure & Public Communication](#), [Disclosure Controls & Procedures](#), [Disclosure for Compliance with Regulation FD](#), [Enterprise Security](#), [Privacy](#), [Protection of Information](#), [Security Management Manual](#)



## Accounting and Business Records

### Accuracy of Books and Records

You have a responsibility to prepare all records in a prompt, complete and accurate manner. These records include vouchers, reimbursement requests, bills, timesheets, performance and payroll reports, and all other company books and records. Records must not be false, misleading, artificial or incomplete.

Entergy requires compliance with generally accepted accounting principles, the FERC Uniform System of Accounts, and Entergy's internal system of accounting and auditing controls. Accurate, reliable information and records are critical to meeting the financial, legal and management obligations of the company. You must comply with all laws, rules, regulations and company policies so that financial reports and records are accurate.

**Relevant Policies:** [Accounting](#), [Approval Authority](#), [Business Travel & Expense](#), [Internal Controls](#), [Project Delivery System](#), [Time Entry & Pay](#)



## Records Management and Document Retention

We have an obligation to maintain records according to the Entergy Records Management and Retention policy as well as the retention periods set forth in the Entergy Records Retention Schedule. The retention periods are prescribed by federal and state statutes, government regulations and business needs. All records are classified by the company as Official Records, Administrative and General Records, or Reference Materials.

We also have a duty to preserve records relevant to anticipated, threatened or pending litigation. Once a Legal Hold Notification has been issued by the Legal department or Tax Services, the recipient is required to preserve all relevant records until receipt of a Legal Hold Release Notification.

**Relevant Policies:** [Records Management & Retention](#)



# We Do Business Fairly

## **Commitment to our Customers**

Acting with Integrity means that we must also do business fairly. That means we hold ourselves accountable to upholding this Code, avoiding conflicts of interest, fighting corruption and competing fairly.

As the utility business evolves, so do customer needs and expectations. We are putting the well-being of our customers at the center of everything we do.

It is on us to make sure all our efforts are directed toward enhancing our customers' everyday lives. By continuing to find new ways to improve, we are working today for a better tomorrow. We are laying the foundation for our future: better

communities, economies and lifestyles that will provide opportunities for all.

## **Conflicts of Interest**

A conflict of interest exists when our responsibilities to the company and our personal interests are at odds. You must avoid activities that cause your personal interests to interfere with your ability to make sound business decisions on behalf of Entergy or otherwise keep you from acting in the best interest of the company when performing your job duties. If any actual, potential or perceived conflicts of interest exist, timely disclose them by following the steps provided in the Conflicts of Interest policy.

## Business Courtesies

Business courtesies are gifts or favors given or received during a business relationship, such as a business relationship with a customer, supplier or contractor. You must decline any business courtesies that could give the appearance of granting an unfair advantage or doing anything that is unethical, unlawful or against Entergy policies.

### May I Accept a Business Courtesy?



### Receiving Gifts

You may never request a business courtesy and never accept cash or cash equivalents. You may accept articles of small value (\$200 or less) on an infrequent basis, such as occasional meals or entertainment provided by an existing or potential customer or supplier. However, even these items cannot be accepted if they are an attempt to get you to grant an unfair advantage or to motivate you to do anything that is unethical or unlawful. Otherwise, you may accept a business courtesy only if it is allowed by the Business Courtesies policy and it is determined that the business courtesy does not create a conflict of interest.

### Giving Gifts

When in a position to offer gifts and entertainment to customers or suppliers, use common sense and good judgment. Do not create circumstances that are inappropriate or give the appearance of impropriety. Also, do not provide business courtesies that are illegal, that violate the rules of the recipient's organization or that are offered for something in return.



### **Outside Employment and Service**

Conflicts of interest may also arise in your work outside of Entergy, including in roles such as service in elected office and external board positions. You must not allow these positions to interfere with or improperly influence your work with Entergy.

### **Employment of Relatives and Personal Relationships (Nepotism)**

The Nepotism policy describes who is considered a relative and specifies prohibited situations involving the employment of relatives. Consult the policy any time a relative is also working for Entergy.

Even if there is no prohibited situation under the Nepotism policy, other personal relationships can give rise to an appearance of impropriety in a workplace situation. These personal relationships are potential conflicts of interest and must be resolved according to the Conflicts of Interests policy. Examples include cohabitation or a dating relationship between a worker and a supervisor in the worker's chain of command and a close personal relationship between an employee's spouse and an Entergy vendor.

### Personal or Family Financial Interests

A potential or actual conflict of interest exists if you influence or try to influence an Entergy business decision or transaction that could benefit you or your family member financially based upon an outside business interest.

**Relevant Policies:** [Business Continuity Planning](#), [Business Courtesies](#), [Conflicts of Interest](#), [Nepotism](#), [Service to Unaffiliated Entities](#)

### Anti-corruption and Anti-bribery

Entergy will not tolerate corruption, bribery, extortion or embezzlement by employees or suppliers.

You must never give, offer, authorize or promise any form of a bribe or kickback. Similarly, employees, agents and suppliers must never seek or accept bribes or kickbacks from an Entergy customer, agent or supplier.

## Anti-Corruption and Anti-Bribery

### Terms to Know

**Bribe:** money or other incentive offered or given to persuade someone to act in one's favor.

**Kickback:** an illegal payment intended as compensation for preferential treatment or any other type of improper services received. Kickbacks include money, a gift, credit or anything of value.

**Money Laundering:** the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.



# Fair Competition

## Human Rights and Employment Practices

Entergy respects the human rights of all individuals, and we are committed to the advancement and protection of human rights in all our operations. This commitment is spelled out in our Human Rights Statement, which is publicly available at [Entergy.com](http://Entergy.com).

This Code and Entergy's Human Rights Statement are closely aligned. Both documents reflect the values Entergy strives to live by as a business leader, employer and corporate citizen.

Entergy follows legally compliant employment practices, including:

- No employment of under-age individuals in violation of any applicable child labor laws.
- No use of forced or involuntary labor.
- Compliance with wage and hour laws and regulations.

## Foreign Corrupt Practices Act (FCPA)

The Foreign Corrupt Practices Act prohibits payments or gifts of any value to foreign government or political officials. It also requires the company to maintain accurate books and records and a system of internal accounting controls documenting domestic and international assets and transactions. Anyone who conducts Entergy business outside of the United States or with foreign officials must understand and abide by the provisions of the FCPA.

## Antitrust Laws and Fair-Trade Practices

Antitrust laws are based on the belief that free and open competition helps to ensure that consumers obtain the best product at the lowest price. The purpose of antitrust laws is to prevent activities that unreasonably restrain free competition.

To ensure we abide by the laws concerning antitrust and fair trade, we must not:

- Engage in unfair pricing or marketing practices.
- Misrepresent the products and services of Entergy or its competitors.

## Export Control

Export control laws regulate the export of certain goods, information and technology outside the United States. These laws also regulate sharing certain controlled items with individuals who are not citizens or lawful permanent residents of the U.S. who do not have refugee or asylum status, regardless of whether they are outside the U.S. For example, this includes sharing controlled items with such individuals located in Jackson, Mississippi, or allowing foreign nationals located offshore to access remotely controlled items that are located in New Orleans, Louisiana.

## Contracting with the Government

We have an obligation to comply with the laws and regulations that apply to government contracting. Certain system companies may be subject to special regulations governing procurement and contracts. It is necessary to adhere to the terms and conditions of any contract with, or grants from, federal, state or local governments. Any employee whose job responsibilities include government procurement and contracts must familiarize themselves with the applicable rules and regulations.

### Government Investigations

Entergy is committed to cooperating with government agencies inspecting company property or investigating or auditing activities. Entergy must provide complete and accurate information and protect its legal rights. The Government Investigations, Inspections and Audits policy explains when employees may respond to government inquiries directly and when employees should engage the company's Legal department.

### Intellectual Property and Copyrights

You may not use, reproduce, modify, download, distribute or otherwise copy any copyrighted, trademarked or patented works of others without written approval from the owner (which may include a license) or consent of Legal Services. You also may not allow others to use company resources to do so.

#### Relevant Policies and Documents:

[Anticompetitive Behavior](#), [Economic Espionage](#), [Export Control](#), [Foreign Corrupt Practices Act](#), [Government Contracts](#), [Government Investigations](#), [Inspections & Audits](#), [Human Rights Statement](#)

### Procurement and Supplier Diversity

Entergy's purchases of products and services are based on the total cost of ownership that includes safety, quality, pricing, sustainability, and diverse and local supplier status. This practice helps to ensure that Entergy obtains the necessary products and services at a fair price and meets its environmental, social and governance goals.

The Supply Chain organization oversees the procurement process and assures that Entergy's interests are protected when products and services are purchased. Only Supply Chain is authorized to commit to suppliers or service providers. Exceptions to using Supply Chain are detailed in Entergy's Procurement policy.

Relevant Policies: [Procurement](#)



# We Care About Our Communities

Entergy's sustainability mission is to create sustainable value for our customers, employees, owners and the communities we serve by using sustainable business practices that integrate environmental, social and economic objectives and concerns.





## Environment

We see environmental stewardship as both a responsibility and an opportunity. Among other imperatives, environmental stewardship is comprised of compliance with applicable laws and regulations and a vigorous approach to addressing climate change. As such, the environmental component of our broader sustainability strategy is inseparable from our business strategy.

We proactively ensure that both the letter and spirit of environmental laws and regulations are adhered to throughout the company and with our contract partners.

We recognize the challenges posed by climate change and will continue to advance, as a business priority, our more than two-decades-long focus on finding and implementing solutions.

We partner with industrial customers in manufacturing, port management and transportation to electrify their energy needs and operations with clean energy solutions that help them reduce their own greenhouse gas emissions. We

also recognize and act on the critical stewardship role we play as a utility with respect to optimizing water use, minimizing waste, reducing air emissions, and avoiding or mitigating instances of environmental injustice. Whether you work in a plant, the field or an office, you are expected to be environmentally conscious. You must follow proper environmental procedures in your daily work. Immediately report any actual, suspected or potential environmental compliance issues via the Ethics Line.

**Relevant Policies and Documents:** [Entergy's Environmental Vision Statement](#), [Environmental, Occupational Health & Safety](#)

## Social

For more than 100 years, Entergy has powered life in our communities through strategic philanthropy, volunteerism and advocacy. Our corporate social responsibility initiatives help create and sustain thriving communities, position the company for sustainable growth and are aligned with the United Nations Sustainable Development Goals.

Giving back and volunteerism are an integral part of our mission because we can only be as successful as the communities we serve. Our top corporate social responsibility priorities are education and workforce development, poverty solutions and environmental programs. Entergy annually makes significant donations via shareholder funded grants to hundreds of nonprofits across our service territory. In addition, our employees and retirees annually volunteer thousands of hours in our communities. These volunteer hours are valued at millions in economic impact.

**Relevant Policies and Other Documents:** [Charitable Contributions & Volunteering](#), [Human Rights Statement](#)

## Governance

We operate our business with transparency, accountability and integrity. Strong governance enables us to deliver on our commitments and to create sustainable value for our stakeholders.

## The Entergy Brand

### Public Communications

At Entergy, we speak with one voice and are committed to communicating truthfully and transparently with the public. If you receive a request for comment from the media or you are asked to speak at an external event or conference, contact the Corporate Communications department immediately.

### Social Media

Use good judgement and be respectful when using internal and external social media tools. When talking about Entergy, be transparent about your association with the company. Always think before you post. Social media posts can be seen by anyone and remain on the internet forever.

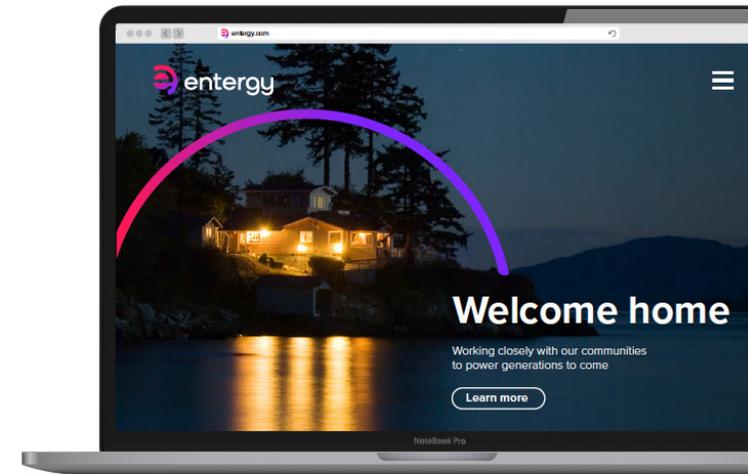
Employee participation in social media is governed by the Employee Use of Internal or External Social Media Sites policy and the Discrimination and Harassment Prevention policy. Both of these policies cover not only work-related conduct but

also other conduct that could have a negative impact on Entergy or our work environment. Examples include, but are not limited to, inflammatory or divisive statements posted on internal or external social media.

### Endorsements and Trademarks

You may not endorse any outside-party goods or services and shall not grant any outside party the right to use Entergy's logo or trademarks, except as advised by Legal Services and with the consent of certain authorized individuals.

**Relevant Policies:** [Disclosure & Public Communication](#), [Employee Use of Internal or External Social Media Sites](#), [Intellectual Property & Endorsement](#), [Public Communications on Behalf of Entergy via Internet or Social Media](#)



## Working together for the next win

We power life.™

# Our visual identity

We express our brand visually with bold simplicity.  
Our brand reflects who we are and what we stand for.  
Our identity helps build trust in the minds of our customers  
while also differentiating ourselves from the competition.



**We power life.**<sup>SM</sup>



**We power life  
today and for  
future generations**

# We Follow the Rules and Guidance of Our **Regulators**

A great deal of information comes to Entergy because we are a vertically integrated public utility with generation, transmission and distribution assets. For this reason, much of our business is subject to federal and state regulatory rules and laws. We are expected to know and comply with all applicable regulatory requirements.

We must work to ensure the reliability of the bulk electric system and to ensure the way we conduct business does not disadvantage other market participants. There are numerous specific regulatory requirements, and it is your responsibility to know and comply with the requirements for your business area. If you have a question regarding whether or how certain regulations apply to your work, you should contact Ethics & Compliance.

## Business Unit Interactions

Entergy is subject to “affiliate rules” governing the interactions between Entergy’s affiliated entities and business units. These rules ensure that any information the Entergy system operating companies obtain because they are monopoly service providers is not used to provide an unfair business advantage to unregulated Entergy system business or to Entergy’s system companies’ generating assets bidding into the wholesale energy market.

**Relevant Policies:** [Affiliate Interactions](#)

## Federal and Local Regulators

### FERC

Entergy’s wholesale operations are subject to the jurisdiction of the Federal Energy Regulatory Commission (FERC). FERC regulates the way Entergy system companies operate in the transmission system and the way Entergy’s system companies’ generating assets participate in the market for the wholesale sale of electricity.

In addition, through the establishment of the North American Electric Reliability Corporation (NERC), FERC issues numerous reliability requirements for the assets comprising the bulk electric system. The requirement to protect Entergy system’s bulk electric system assets applies to both physical and cyber assets and requires all employees to be vigilant in following all applicable policies and procedures. To ensure compliance with its regulatory requirements, FERC could assess penalties of over \$1 million per day for each violation of its rules.

### NRC

The Nuclear Regulatory Commission (NRC) is an agency of the United States government tasked with protecting public health and safety related to nuclear energy. Because Entergy has nuclear power plants, we are required to comply with all NRC issued rules, regulations and standards.

### Public Service Commissions

Each Entergy system operating company is subject to the jurisdiction of a retail public service commission. Retail public service

commissions reference those regulators responsible for overseeing how the operating company interacts with its end-use customers (i.e., residential, commercial businesses and industrial customers). Retail regulators dictate the price, terms and conditions of service for their jurisdictional operating company. Any questions related to Entergy’s operations at the retail level should be directed to the appropriate operating company’s Regulatory Affairs department or the Regulatory Legal department.

**Relevant Policies:** [FERC Compliance](#), [NERC Reliability Standards](#), [Nuclear policies & procedures](#)

### Political Activity

You are responsible for complying with applicable federal, state and local laws relating to political activity. Our Political Activity – Contributions, Lobbying and Elective Office policy provides direction, guidance and information on how best to ensure compliance with these laws. It also specifies requirements regarding corporate political contributions.



You are encouraged to be personally involved in the political process, and you may contribute to the cause or candidate of your choice. But you must do so using your own time, money and resources.

**Relevant Policies:** [Political Activity – Contributions, Lobbying & Elective Office](#)

### Insider Trading

Insider trading is illegal, unethical and strictly prohibited. Insider trading is engaging in a transaction involving Entergy’s securities while in possession of material nonpublic information. This information includes any information that may influence an investor’s decision to buy, sell or hold the securities of a company. Tipping – providing confidential information to others who may trade on it – is also prohibited.

Members of Entergy’s board of directors, executive officers and certain restricted employees may engage in trades in Entergy securities only during a “window” period. Entergy will notify these individuals of when a “window” period occurs.

**Relevant Policies:** [Insider Trading](#)

## Insider Trading

### Terms to Know

**Material Information:** information that a reasonable investor would consider important in making a decision to buy, hold or sell Entergy securities.

**Material, Nonpublic Information:** material information that has not been publicly disclosed (made available to investors generally).

# Waivers and Disclaimers

## Waivers

No waivers will be granted for the Code of Entegrity.

## Notices and Disclaimers

The Code is not a human resources handbook. It does not address or reference many policies relating to important personnel issues such as benefits, time off or employment rights. For help with such issues, contact Human Resources Employee Services or consult the appropriate system policy on myEnergy.

This Code replaces all prior versions of the Code of Entegrity. In the event that there are differences between a printed

and online version, the online version is the current statement of the Code. The online version can be found on myEnergy (Policies & Forms > Code of Entegrity). If myEnergy is not available, a copy can be provided by supervisors, the Ethics and Compliance department or Human Resources Employee Services.

The description of policies, practices or procedures contained in this Code or a referenced policy, or as told to you by an Entergy representative, does not create any terms and conditions of an employment contract. This Code does not constitute or create any contractual obligation between you and an Entergy system company. All Entergy system employment is at will and can be ended

by either party, at any time, without prior notice or cause, except as provided in a collective bargaining agreement or other authorized express written employment contract between an employee and an authorized representative of the applicable Entergy system company.

The Code is not intended to, and will not be construed to, interfere with or restrict any rights provided by law, including those afforded under the National Labor Relations Act. Nothing in this Code will be construed to limit an employee's right to speak with others regarding wages and other terms and conditions of employment or to exercise any other legally protected right.



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## Code of Entegrity

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[www.entergy.com](http://www.entergy.com)

