



Living our Values

# Fulfilling our Purpose

How we work at Alliant Energy – our **Code of Conduct**



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## A message from Lisa Barton, President and CEO

### Dear Alliant Energy employee:

At Alliant Energy, we *Do the right thing* every day. It's one of the Values that powers the success of our company, our communities and customers we serve.

We are not only stewards of the gas and electric grids but stewards of the company. We know all of our employees want to represent the company well, which is why we have the Code of Conduct. The Code spells out how we conduct business and treat each other: Ethically, honestly and with respect.

The Code provides guidance on what to do in difficult situations and gray areas. It encourages you to ask questions when you're not sure and speak up if you do see something that goes against our Code.

You play an essential role in supporting an ethical workplace. **Our Code of Conduct applies to all employees** at every level, as well as our board of directors, contractors, vendors and suppliers. We are each responsible for knowing and following the Code to protect ourselves, our co-workers and the company from the outcomes of unethical behavior.

Following our Code is critical to maintaining our reputation, protecting our assets, ensuring equal employment opportunities, sharpening our competitive advantage and driving long-term growth. By following the Code, you ensure collectively that we are stewards of the company and protect our Purpose to serve customers and build stronger communities.

Let's keep it going and our business growing.

Thank you for all you do to make Alliant Energy a safe and respectful workplace.

Lisa Barton  
President and CEO





## How we use our Code

At Alliant Energy, we serve our customers and build stronger communities. We deliver the power they rely on – safely, efficiently and responsibly, treat each customer with respect, support our communities and empower their growth.

Each of us contributes to accomplishing our Purpose. And it's much more than completing our daily duties. It requires us to live our Values, follow all laws and regulations, our company policies and procedures and conduct our business honestly, fairly and with integrity.

### How to use the Code of Conduct

During your career, you will likely find yourself in a situation where you ask yourself, “Is this right, legal or ethical?”

Our Code of Conduct serves as a guide for our employees, the directors of our board and third parties including vendors, contractors and suppliers. Our Code of Conduct sets forth the minimum standards of ethical conduct. It can help you determine the right course of action in a questionable situation or help you avoid it altogether. Consult the Code to make the right choice.

### Policies, procedures and questions

However, the Code can't address every scenario. We also have policies and procedures you are expected to know and follow.



### Where We Work

Please remember that our Code of Conduct applies regardless of where we work – in an office, in the field, at home, in person or remotely.

### Have questions? Don't be afraid to ask!

If you ever have a question about the Code or violations, don't be afraid to ask questions.

- Go to your supervisor, your manager or a manager in another department.
- Talk to someone in HR. Submit a confidential question to HR in Workday. Go to the Help page and select “Create Case.”
- Contact the Compliance Office, call the Compliance Hotline at 1-844-218-3357 or use the Web Reporting System.

The Compliance Hotline and online hotline allow you to report anonymously. Please note that our Compliance team may be unable to thoroughly review your concern if they need more information or have questions. Learn more in the “Questions, reporting, retaliation” section of the Code.



## Leader responsibilities:

If you're an employee in a leadership position (supervisors, team leads, managers, directors, vice presidents, executive officers, etc.) you have additional responsibilities.

- **Model our code and our values.** Be a good role model of integrity and create an environment that encourages following the Code of Conduct and compliance activities.
- **Talk about our code and our values.** Discuss the importance of our values, ethics, and compliance and let employees know you expect them to always do what is right.
- **Maintain a positive and inclusive work environment.** Create an inclusive workplace free of discrimination and harassment where everyone feels that they can come to work and be their whole, authentic self.
- **Foster a speak-up culture.** Ensure that employees understand they can report violations in good faith without fear of punishment, reprisal or retaliation, and that their concerns will be heard.
- **Respond to requests for guidance.** Encourage employees to seek advice and guidance about appropriate workplace conduct without fear of punishment, reprisal or retaliation. Use the Code of Conduct, company policies and other resources within the company when responding. When in doubt, escalate the question or ask for additional help. It's better to say you don't know and will follow up, rather than provide a wrong answer.
- **Report known or suspected violations.** Any leader who observes conduct that may violate the Code MUST take immediate action to stop it and promptly report the matter. Immediately report any complaints or possible violations of this Code of Conduct raised by your employees to your human resources representative or the Compliance Office at (608) 458-7103.

## Everyone's responsibilities

- Read and understand the Code of Conduct and our policies and procedures.
- Complete Code of Conduct training each year.
- Speak up! If you see something, say something. Report suspected violations.
- Fully and honestly cooperate with compliance disclosures, audits, reviews and investigations.
- Do not retaliate against others if they report a violation or suspected violation.

## Violations

Violation of our Code of Conduct is grounds for disciplinary action up to and including termination of employment.





## Questions, reporting and retaliation

### **Speak up! Ask questions, raise and report concerns**

#### **Ask questions**

It takes courage to ask questions. You are encouraged to speak up by asking questions about our Code of Conduct or any Alliant Energy policy or procedure. If you are uncertain about the appropriate action to take in any given situation, please do not hesitate to ask!

When faced with a difficult decision ask yourself the questions below. They'll help you perform an "instant gut check." If what you are about to do, or what you see a co-worker do, doesn't seem right, trust your gut. Change your course of action or make a report.

#### **Ask yourself**

- Is this consistent with the Code of Conduct, our Values and Alliant Energy policies and procedures?
- Is this ethical?
- Is this safe?
- Could this negatively affect the company's reputation?
- Is this appropriate conduct for the workplace?
- How would I feel if the actions ended up in the news or on social media?
- If my family, friends or coworkers knew about it, would I be okay?





## Questions, reporting and retaliation

### Raise and report concerns

Our employees are the gatekeepers who make sure we always conduct our business in a way that reflects our Values. You are also encouraged to speak up by raising and reporting concerns.

We all have an obligation to raise concerns and promptly report any known or suspected violations of our Code of Conduct, policies and procedures, laws or regulations, or other conduct that is dishonest, unethical or illegal.

### How do I raise or report a concern?

1. A good place to start is talking to your supervisor. They should know you and your job. They are in the best position to understand your concern and take appropriate actions.
2. If you are uncomfortable raising your concern to your leader, consider talking to a leader in another department or any level of management.
3. If you are not sure of a leader to talk to, call our Compliance Office at 608-458-7103.
4. Contact your Human Resources Representative or create a case in Workday. Visit the Help Center in Workday and search “create case”.
5. Call our Compliance Hotline at 844-218-3357, use the Online Compliance Hotline or speak to someone in HR.



### Privacy and confidentiality

All concerns are taken seriously by Alliant Energy.

Any information you provide to assist Alliant Energy in investigating your report will be shared only with those who have a need to know to help investigate your concerns, ensure the prompt enforcement of the Code, determine appropriate disciplinary action or as otherwise required by law.

You may remain anonymous except where restricted by applicable law.



### Ask HR

Have a question, suggestion or comment on a human resources topic?

Submit a confidential question to HR in Workday. Go to the Help page and select the blue “Create Case” button at the bottom of the screen.

You can expect a follow-up within one business day.

If your request is urgent, contact an HR Representative for assistance.





## Questions, reporting and retaliation

### What happens after I report a concern?



**Contact:** You may use [our reporting options to report a concern or ask a question.](#)

**Review:** Your concern or question will be promptly reviewed by the appropriate staff.

**Investigation:** You may be contacted during the investigative process to provide information. The company's goal is to resolve questions and concerns as soon as possible.

**Decision:** You may be notified of the outcome of the investigation, but this cannot always be guaranteed. You are encouraged to reach out to investigative contacts with additional questions.

### Retaliation

Alliant Energy prohibits all forms of retaliation against an employee for raising a concern in good faith or assisting with an investigation regarding a potential violation of our Code, our policies, or laws and regulations. Alliant Energy also prohibits retaliation as set forth in all applicable laws.

If you know or suspect that you or someone else has experienced retaliation, please report it immediately.





## How we work

Our Values are the foundation of how we work and our guide for an inclusive, innovative and safety-focused culture. The following pages address how our Values and Code of Conduct work together to support each other.



### **Live safety. Everyone. Always.**

Our first priority is that nobody gets hurt.



### **Do the right thing.**

We keep our promises and conduct our business openly and honestly.



### **Care for others.**

Together we create a workplace where people feel like they belong and can use their unique backgrounds, talents and perspectives to their fullest potential.



### **Make things better.**

We partner with our customers and communities to solve problems, create opportunities and help make life better.



### **Act for tomorrow.**

We use resources wisely, care for the environment and continuously improve ourselves and our company.



### **Think beyond. Be bold.**

We create and embrace change, innovate beyond current practices and use our curiosity to find new solutions.





## How we work

### ***Live safety. Everyone. Always.***

Alliant Energy is committed to providing a safe environment for our employees, visitors, customers, vendors and the communities in which we live and work.

Our ultimate goal is that everyone goes home uninjured at the end of the day. Each of us has the responsibility to report an unsafe work condition in good faith. By working together, we can eliminate safety hazards and at-risk behavior.

As part of providing a safe work environment for all employees, Alliant Energy strictly prohibits any conduct that appears to be violent or threatening, degrading, humiliating, intimidating or abusive toward any employee, customer, vendor or visitor.

You should immediately report any such behavior by using one of the options described in the “Questions, reporting concerns and retaliation” section.

### **When faced with a potentially dangerous situation:**

Report the situation immediately to the Central Alarm Station (CAS) at (319) 786-3333 or 1-800-972-5341.

In cases of fire or medical emergencies, always call 9-911 first.

### **Need to talk? Spring Health is ready to listen**

Spring Health is our mental well-being benefit. It provides high-quality support at no cost to all employees, their spouses/partners and dependents ages 6-26.

You and your covered family members have access to six sessions of free therapy per person per year. You can meet virtually or with a local mental health provider, usually within 48 hours.

Your care with Spring Health is private and confidential.

### **Spring Health is just a click or call away.**

- Access your account at [alliantenergy.springhealth.com](https://alliantenergy.springhealth.com).
- Contact Spring Health at [careteam@springhealth.com](mailto:careteam@springhealth.com) or call 1-855-629-0554.

### **Crisis support**

Spring Health provides **24/7 crisis support at 1-855-629-0054**. Another option is the National Suicide and Crisis Lifeline. Call or text 988. In an imminent emergency, call 911.



### **Drug, alcohol and smoke-free workplace**

Maintaining a drug- and alcohol-free workplace is critical to a safe working environment for you, fellow employees and the public.

Our Drug, Alcohol and Smoke-free Workplace Policy prohibits the use, possession, sale, purchase, manufacture, distribution, dispensation or being under the influence of drugs or alcohol while performing work for or on behalf of Alliant Energy. That includes breaks, meals and overtime, on company property, at a home office or in vehicles.

An exception to allow alcohol at certain company events may be granted at the discretion of the Vice President sponsoring the event.

Additionally, Alliant Energy supports a smoke-free workplace in accordance with all applicable laws. For additional information, please see the Drug, Alcohol and Smoke-free Workplace Policy.



## How we work

### **Care for others**

We remain focused on creating a culture of belonging in which we want everyone to bring their unique experiences and perspectives. Most important, we want people to continue to be themselves as it has allowed us each to embrace our similarities as well as differences in an inclusive way. A culture of belonging also helps us collectively solve energy challenges facing the communities we serve. When everyone feels like they belong and can fully contribute, we can better support our Purpose of serving our customers and building stronger communities.

### **Equal employment opportunity and non-harassment**

We are committed to equal opportunity in employment, without regard to:

- Race.
- Ethnicity.
- Gender.
- Gender identity.
- Sexual orientation.
- Disability.
- Age.
- National origin.
- Education.
- Religion.
- Genetic background.
- Socioeconomic status.
- Veteran/military status.
- Perspective and many other attributes that make each of us unique.

Alliant Energy prohibits harassment and discrimination in all categories as set forth in applicable federal, state or local laws.

### **What should I do?**

If you think you are being treated differently or someone you know is, report it immediately to Human Resources, Legal and/or Compliance.

## Communities of Purpose

Aligned with our Values – including to Care for Others and Act for tomorrow – Communities of Purpose provide dynamic, employee-led engagement opportunities.

### **Common themes provide the foundation for our three Communities of Purpose:**

- **Connection:** The Connection Community of Purpose creates a space for employees to connect with different perspectives, people, and ideas outside their immediate teams.
- **Career:** The Career Community of Purpose provides opportunities to grow through exposure to different lived experiences and professional paths.
- **Company:** The Company Community of Purpose is focused on learning more about how our business works and how it contributes to the communities we serve. These organizations reflect our commitment to employee engagement, professional development and an inclusive culture. We encourage all employees to engage in these opportunities to learn from one another and act upon our collective Purpose.



## How we work

### Sustainability

We use resources wisely, care for the environment and continuously improve ourselves and our company.

The way we do business at Alliant Energy reflects our commitment to a clean, safe and healthy environment. Alliant Energy is committed to complying with all environmental laws and regulations.

We integrate environmental requirements into all planning, decision-making, construction, operating and maintenance activities we perform. Employees must conduct work in a manner demonstrating Alliant Energy's concern for preserving natural resources and protecting wildlife – acting in accordance with our Value to *Act for tomorrow*.

If you believe an event has occurred involving noncompliance with an environmental law, regulation, permit, or Alliant Energy policy or procedure, immediately contact your supervisor, the Director – Environmental Services and Corporate Sustainability, or the Compliance Office. For more information on how we demonstrate our environmental commitment, please see the Environmental Services and Corporate Sustainability page on The Point.







## How we conduct business

### ***Do the right thing***

Our Values guide how we do business. We do the right thing. That means you should understand and follow all federal, state and local laws and regulations as well as Alliant Energy policies and procedures.

#### **In this section:**

- Following laws and regulations.
- Ethical labor practices.
- Maintaining accurate business records.
- Accuracy of financial reports and audits.
- Using social media.

### **Ethical labor practices**

We treat all our employees with respect and dignity in the workplace.

We are committed to:

- Adhering to all applicable laws concerning non-discrimination.
- Adhering to all applicable laws concerning forced labor, human trafficking and child labor.
- Providing work hours, wages and benefits in compliance with applicable laws and regulations and applicable collective bargaining agreements.
- Complying with applicable wage, work hours, overtime and benefits laws.

We respect the right of our employees to join, form or not to join a labor union consistent with applicable organizing law without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives and bargaining in good faith.

### **We follow the law**

Our businesses are heavily regulated by many federal, state and local governmental entities, including the Federal Energy Regulatory Commission (FERC), the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Securities and Exchange Commission (SEC). In addition, state agencies, such as public utility commissions and departments of natural resources have regulatory oversight, and government-sponsored entities such as the North American Electric Reliability Council (NERC) have oversight responsibilities.

Our utility subsidiaries are subject to state and federal codes of conduct designed to ensure that they do not subsidize or otherwise grant an undue preference or advantage to their affiliate companies or non-regulated marketing functions. We follow all applicable affiliate transaction rules, standards of conduct and codes of conduct.

It is our responsibility to perform our jobs in accordance with the law. All employees should also encourage others to comply with the law. References to “law” in this Code of Conduct include any applicable federal, state or local statute, regulation, order or standard.





## How we conduct business

### Maintaining accurate business records

Corporate information is an important company asset that all employees must be vigilant to protect. All of us are responsible for ensuring that the records in our custody or control are classified, stored, retained and destroyed in compliance with all legal and regulatory record keeping requirements.

#### To maintain accurate business records and protect corporate information, you should:

- Comply with our records management policies and retention schedules for all business records, paper or electronic.
- Follow all retention instructions on a legal hold notice if you receive one, regardless of the retention schedule or applicable law. Destruction of documents subject to a legal hold notice, even inadvertently, could expose our company and you to civil and criminal liability.
- Reach out to the Content & Records Management team and Legal Department for specific questions. Find out more about our business records management at the Information Management Playbook.

### Accuracy of financial reports and audits

Alliant Energy has controls and procedures in place that all employees must follow to ensure that we comply with accounting and disclosure standards and regulations; allocate revenues and expenses to the appropriate affiliates, regulatory jurisdiction(s) and business line(s); and provide full, fair, accurate, timely and understandable reports.

It is important that all accounting records and reports, including any supporting documentation, accurately reflect and describe corporate transactions.



Some of the activities you perform on a regular basis affect Alliant Energy's accounting records and reports. As an employee, you should ensure that you:

- Complete your time sheet and expense report correctly and on time.
- Approve time sheets with accuracy.
- Verify requests for access are required and that such access is necessary on a periodic basis.
- Approve accurate payments for goods or services in a timely manner.
- Appropriately characterize a transaction.
- Follow the governance process set forth by the company.
- Receive prior review and approval of the legal department for any legally binding document that modifies or interprets existing customer agreement.
- Verify reports that will be filed with any regulatory agency or made public and relied upon are full, fair, accurate, timely and understandable.
- Present accurate medical information to obtain employee benefits, including disability.



## How we conduct business

### Use of Artificial Intelligence in the workplace

Artificial intelligence (AI) and its usage in the workplace is part of a growing trend that allows us opportunities to Think Beyond. However, this powerful technology can also lead to unintended consequences that can introduce malware into our network, expose sensitive information and more.

You are 100% responsible for your use of AI in the workplace!

Here are some do's and don'ts to think about:



**Do**

- Comply with all regulations, laws and follow our Company Policies: INF112 – Information Classification  
CYBER 322 – Artificial Intelligence Policy
- Use company-reviewed and approved AI tools for business purposes, while following our Artificial Intelligence Policy.
- Review AI generated content to make sure it is accurate and appropriate.
- Keep a human in the loop. Use AI to support – not replace – your judgment for decisions involving safety, operations, customers, compliance or other important topics.
- Contact the Security Risk team (The Point > Business Areas > Cybersecurity) so that appropriate review of any application integration or application feature that interfaces with an AI tool can be made.
- Report issues. If you see unsafe, biased or suspicious AI behavior, report it immediately to the Cybersecurity Operations Center (CSOC) at 608-458-3838.

**Don't**



- Share employee, customer or regulatory information with a public AI engine, including language models such as Chat GPT.
- Share sensitive data with a public AI engine for analysis, testing or any other use.
- Use AI-generated content that is defamatory, discriminatory, biased, illegal or violates any corporate policy.
- Use AI for deceptive practices, misinformation, impersonations, infringement or manipulation.
- Claim AI output is inherently accurate. AI should be treated as a tool – not an authority.





## How we conduct business

### How we portray ourselves publicly

#### Social media

Social media serves as an excellent way to communicate not only locally but across the globe with ease. While we encourage you to use the various social media channels available to you, we must remember our responsibility and affiliation to Alliant Energy, even when you are off the clock.

You are expected to think about what you post, especially when you use company equipment or identify yourself as an Alliant Energy employee on your social media platforms. When using social media, even on your private accounts, remember that you are entitled to your personal views but your affiliation with Alliant Energy is still always there.

Visit our Social Media Central page on The Point to learn more about using social media in a way that reflects our Values.

Social media includes posting pictures and videos. Some examples of social media channels include, but are not limited to:



Here are some quick do's and don'ts to consider when using social media:



**Disclose your affiliation:** If you talk about work-related matters you should disclose your affiliation with Alliant Energy.

**State that it's your opinion:** Unless you're authorized to speak on behalf of Alliant Energy, you must state that the views expressed are your own.

**Honor inclusion:** Alliant Energy does not tolerate discrimination or harassment of any kind. Avoid engaging in harassing, defamatory or disparaging content that can be culturally sensitive.



**Disclose non-public financial or operational information:** This includes strategies, forecasts and reports. Never share personal information about our customers. If you have concerns or questions, please speak to your leader first.

**Disclose legal information:** Avoid sharing anything that has to do with a legal matter related to our company. Please check with your leader, who will then check with our legal department.

**Take anything that belongs to someone else:** Be careful with how you use copyrighted publications and trademarked images, especially of Alliant Energy. If you have questions, visit our Copyright Compliance and Trademark and Domains pages on The Point.





## Acting with integrity

The following pages will address how these can impact and guide the work that you do:

- Conflicts of interest.
- Antitrust, fair dealing.
- When are gifts and entertainment appropriate?
- Anti-bribery and corruption.
- Employee political activity.
- EPAN.
- Relationships with public officials and other government employees.

### Conflicts of interest

A conflict of interest can arise any time you face a choice between a personal interest (financial or otherwise) and the interest of Alliant Energy.

Perception matters! You need to be aware of how your actions might be perceived by our customers, your fellow employees, shareowners, regulators or neighbors in local communities – and avoid acting in ways that could be interpreted as conflicting with the interests of Alliant Energy.

When faced with a possible conflict of interest, ask yourself the questions outlined in the “Making the right choice” section, review the Alliant Energy Conflict of Interest Policy and always contact your supervisor or one of the other options outlined in the “Asking questions, reporting concerns and retaliation” section.

As explained in our policies, employees are required to report any conflicts of interest. Employees are also asked to certify that they have reported all conflicts during required annual training.

A conflict of interest can be actual or apparent and can show up in many different circumstances. Here are a few examples:

- Gifts – giving or receiving them.
- Business meals.
- Reporting to or supervising a good friend or relative.
- Employment outside the company.
- Relatives or friends as vendors or other business partners.
- Rebates from vendors.
- You or a relative having a significant financial interest in a business that is seeking to do business with the company or does business as a customer of Alliant Energy or its subsidiary.
- Soliciting vendors or customers to donate to organizations that are not endorsed by Alliant Energy.
- Romantic or intimate relationships in the workplace.

### Got a side hustle?

Whether you call it moonlighting, a second job or a side hustle, many employees pursue ways to increase their income outside of work. Maybe you deliver food or packages, bake cakes and cookies for sale, sell jewelry, make-up, kitchen products, etc., work some hours at a family member's business or are starting your own business, that's all perfectly fine. Just make sure it doesn't go against our Conflict of Interest policy. That's even more important if the business may want to do business with our company. Not sure if it's a conflict of interest? Consult the policy, talk to a supervisor or contact the Compliance Office if you have questions.



## Acting with integrity

### Antitrust and fair dealing

What does this mean for you?

- You are prohibited from making agreements with competitors that might adversely affect competition, including agreements setting prices or other competitive terms.
- You should not take any action for the purpose of harming or excluding a competitor, such as denying a competitor access to a market.
- You must refrain from discussing or exchanging information on prices, bids or other aspects of competition with competitors that are intended to or that will have an adverse impact on competition. Discussing these subjects with a competitor can give rise to an inference that an illegal agreement exists, since the agreement does not have to be in writing for these activities to be a violation of antitrust laws.

Because antitrust laws are complex, their requirements are not always obvious and their violations can have serious and severe consequences.

Seek advice from Legal Services if you have questions regarding how these laws may apply in a specific situation.

Note that discussing joint advocacy between competitors is allowed by federal and state antitrust laws, but please seek advice from Legal Services before determining that this exception applies to certain circumstances.



### When are gifts and entertainment appropriate?

Other companies or outside people you work with often give gifts to build goodwill or improve the business relationship. But be aware that you could be opening more than you bargained for.

Do not accept any gift that creates a sense of obligation or compromises your judgment. Remember, perception matters. You may feel the gift is appropriate, but others might think it's not.

If you have questions about exchanging gifts with customers or suppliers, please ask your supervisor or the Compliance Office.

#### Gifts and entertainment:

- Must be acceptable under our Conflicts of Interest Policy.
- Must appear reasonable and legitimate to an outside observer.
- Must never be given in exchange for something in return.
- Must never be solicited (like asking a supplier for football tickets).
- Must be open and transparent.
- Must comply with applicable disclosure requirements.

#### Prohibited gifts and entertainment under Alliant Energy policy:

- **No** lavish or excessive gifts, meals, travel or entertainment.
- **No** frequent giving or receiving of gifts, meals, travel or entertainment.
- **No** gifts of cash, gold, precious metals, gemstones or any item or entertainment that creates embarrassment for yourself and Alliant Energy.
- **No** giving or receiving gifts immediately prior to or during a bid, deal or contract negotiation.



## Anti-bribery and corruption and government gifting

Alliant Energy prohibits – at all times and in any form – bribery, corruption, improper payments or laundering the corrupt proceeds of these practices. These practices are prohibited whether they are engaged in directly or indirectly, including through third parties, including Alliant Energy's business partners.

Even though we are a domestic business, our obligations sometimes extend beyond our borders. Just like we follow all laws and regulations on imports and international trade, we also abide by all foreign and domestic laws that forbid bribery, including the U.S. Foreign Corrupt Practices Act.

A bribe is offering or giving anything of value for the purpose of obtaining or retaining business or securing an improper advantage. Bribes may include:

- Cash
- Gifts
- Discounts
- Meals
- Travel and Entertainment
- Political or charitable contributions
- Kickbacks of payments made under a contractual agreement
- Facilitating payments made to expedite standard government services such as processing permits or other services
- Personal favors such as improperly securing job offers or contract opportunities

You also may not accept anything of value that might affect your objectivity in doing your job or secure an unfair business advantage.

You must promptly report any suspected bribery, demands or offers for a bribe, or the actual payment of a bribe made under coercion, directly to your supervisor, the Compliance Office, and local law enforcement.

If you are working with a government official, be especially cautious. A government official can be a national or local government official or employee, a political candidate, or an official or employee of government-owned or government-controlled entities. You are required to contact the Public Affairs Department for approval before giving a gift to a government employee, regardless of whether personal funds will be used, and regardless of the value of the gift.

You may not hire a third party to do something that you cannot ethically or legally do yourself. Doing so may violate this Code and anti-corruption laws. Anti-corruption laws are complex, and the consequences for violating these laws are severe. If you have any questions, contact the Compliance Office.





## Acting with integrity

### Employee political activity

We encourage you to participate in the democratic process. Active involvement is one way to practice good citizenship and *Make things better*. But there are things to consider:

- Any political activity (other than voting or participation in EPAN) must be done on your own time.
- You must use your own resources (some exceptions apply).
- It must not interfere with your work or that of your co-workers.
- It should not in any way suggest that Alliant Energy is involved in or supportive of an issue or candidate.



### Employee Public Affairs Network

The Employee Public Affairs Network (EPAN) is Alliant Energy's voluntary, nonpartisan political action program. Through EPAN, eligible employees can combine their individual voices and financial contributions to help educate candidates and elected officials on Alliant Energy's Purpose of serving customers and building stronger communities. EPAN supports those policy makers who represent Alliant Energy's service territory, serve on committees relevant to our industry, and those who take an interest in issues of importance to our company and recognize the impact of their decisions on our ability to provide reliable and affordable service to our customers.

### Relationships with public officials and other government employees

Under the guidance of the Public Affairs Department, some employees may occasionally contact government and regulatory officials on behalf of the company to keep them informed about our operations and positions on issues.

Public Officials and Government-Affiliated Employees include employees or representatives (elected or appointed) of:

- Foreign, federal, state, or local governments (i.e. executive, legislative, or judicial branches)
- Government-owned, sponsored or affiliated companies
- Regulatory commissions
- Other entities with oversight over Alliant Energy or any of its affiliates

Special rules apply to business courtesies given to political candidates, government-affiliated employees and public officials. Employees responsible for these contacts and exchanges of business courtesies must understand and obey the laws and rules governing lobbying activities as well as any registration and reporting requirements. If you have questions, contact the Public Affairs Department.

### Running for office?

If you want to run for local, state or federal office, you must talk to your supervisor, the Compliance Office and the Public Affairs Department, as well as review the Alliant Energy Conflict of Interest Policy.





## Protecting our assets

### In this section:

- Protection and use of Alliant Energy assets.
- Intellectual property.
- Endorsements.
- Protecting personal information.
- Privacy expectations.
- Confidential information.
- Electronic assets.
- Insider information and securities trading.
- Government requests for information.
- Contact with the public and media.

### Protection and use of Alliant Energy assets

You have a responsibility to use Alliant Energy property, facilities and equipment properly and efficiently. This means protecting Alliant Energy assets from loss, theft, abuse and unauthorized use.

Assets such as vehicles, computers, software, email, copiers, tools and supplies should be used for legitimate business purposes only. Although limited personal use of some Alliant Energy assets may be permissible, the use must be approved by your supervisor and must not interfere with your job responsibilities, not unreasonably increase company expense or liability and not violate Alliant Energy policies or procedures.

### Intellectual property

Inventions, trademarks, copyrights, logos, our company name, software and publications developed by employees are all intellectual property, are the sole and exclusive property of Alliant Energy and must be protected like any other asset.

If your work requires you to use material that could be considered intellectual property, discuss this use with your supervisor.

### Endorsements

To protect our intellectual property, we do not offer endorsements of third-party products and services on behalf of Alliant Energy or by individual employees without appropriate approval from our Marketing, Communications and Community Affairs department. Contact them at [corporatecommunications@alliantenergy.com](mailto:corporatecommunications@alliantenergy.com).



# Alliant Energy®

*Powering Beyond*



## Protecting our assets

### Protecting personal information

Our customers, employees, and third parties trust us to protect and limit use of their personal information and respect their privacy. Personal information is any information that, by itself or in combination with other information, identifies or can identify a person, directly or indirectly, such as name, email address, phone number, government identification number, account number, energy usage, medical information, user ID and password, and online identifiers like MAC addresses, IP addresses or persistent cookies.

### Keep the information secure

- Minimize the collection, sharing, and use of personal information only to what is needed to perform your work.
- Comply with Alliant Energy's Records Management classification, storage and destruction requirements.
- Share personal information only with approved third parties, and only for legitimate business purposes.

You must ensure that all third parties you engage or work with that provide for access to any Alliant Energy information, systems or other information services also adhere to Alliant Energy's Information Management Policies, and, if necessary, the Data Access Rider.

### Privacy expectations

You should not have an expectation of privacy regarding the use of Alliant Energy information resources on your company or personal devices. Any Alliant Energy information you create, share or download onto your company or personal device belongs to the company.

Alliant Energy reserves the right to monitor, record, disclose, audit and delete without prior notice the nature and content of an employee's activity using our company's email, phone, voicemail, internet and other systems, to the extent permitted by applicable law.

### Examples of confidential information

- Company financial data.
- Vendor information.
- Personal employee or customer information.
- Strategic plans.
- Information regarding company business contracts or negotiations (excluding collective bargaining).
- Information provided to Alliant Energy by a third party that is subject to a confidentiality agreement.

### Examples of personal data incidents

- Emailing or mailing documents with personal information to the wrong recipient.
- Emailing personal information to your personal non-Alliant Energy email address.
- Posting personal information to an unsecured shared site.
- Losing a company laptop, phone or other device.

If you suspect a **cybersecurity** related incident such as a data breach, malware infection, careless display or sharing of passwords, or attempts to obtain sensitive information report the situation immediately to the Cybersecurity Operations Center (CSOC) at 608-458-3838. Leave a message if nobody answers to notify the analyst on-call.

If you suspect a **physical security** incident such as theft or loss of a laptop or handheld device, unusual behavior – people out of place and suspected surveillance of property, report the situation immediately to the Central Alarm Station (CAS) at 608-458-3333. If it's an emergency, call 911 and then the CAS.

If you are unsure of where to report the situation, visit the Cybersecurity Operations Center (CSOC) page.



## Protecting our assets

### Electronic assets

Our electronic assets consist of email, internet, and other software applications that can be used on either company-owned and/or personal equipment. No matter what you use, you still have the same responsibilities under our information management policies and procedures. This information is easily found on The Point and in our easy-to-use Information Management Playbook.

Here are keys to putting information security into practice:

#### Don't

- Allow others to access your electronic devices or user identification credentials.
- Use unsecure online accounts, including social media accounts.
- Leave laptops or other mobile devices unattended while traveling, working remotely where other people (including family) can easily access them or in an exposed location where they can be stolen.
- Download unauthorized or unlicensed software.
- Disable, defeat or circumvent any security controls.
- Respond to suspicious phone calls or emails.

#### Who to contact

If you have questions regarding material, nonpublic information, or have witnessed what you believe is an improper use of such information, contact your supervisor, the Compliance Office or any resource identified in the “Questions, reporting concerns and retaliation” section.

### Insider information and securities trading

Alliant Energy is a publicly traded company, and in the course of your job responsibilities, you may come across material, nonpublic information regarding the company. Material, nonpublic information includes information about Alliant Energy that is not known by the general public and would be considered important to someone who is deciding if they should buy or sell the company's stock, or if the information is likely to have a significant effect on the market price of a company's stock. Both positive and negative information may be considered material.

Examples may include:

- A potential purchase or sale of a business.
- Undisclosed financial information.
- A potential rate filing.
- An upcoming senior management change.
- A cybersecurity incident.

Insider trading is using the material, nonpublic information about the company for your own financial benefit or the benefit of others. It is unethical and illegal.

You violate securities laws if you buy or sell stock when you have this information, or you share the information with others so they can profit (or avoid losses) from buying or selling our stock.

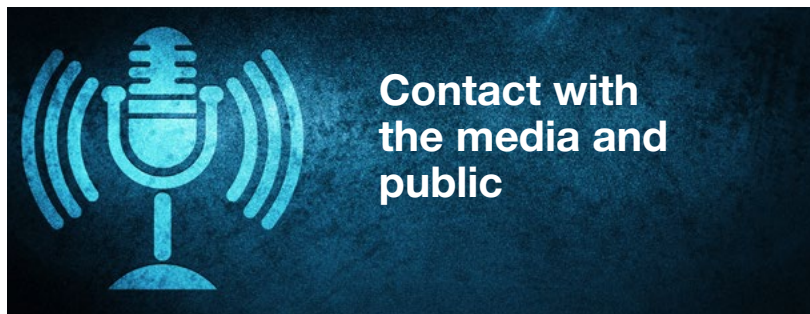
Using material, nonpublic information regarding Alliant Energy or another company for your own financial benefit or the benefit of others is unethical and against the law. It is a violation of securities laws to buy or sell stock while in possession of this type of information or to provide this information to others so that they may buy or sell stock of Alliant Energy or another company.



## Protecting our assets

### Government requests for information

As part of your job responsibilities, you may receive a request from a federal, state or local investigator seeking information regarding Alliant Energy operations or employees. This could include requests for interviews with employees, subpoenas, data or copies of documents or access to files. If you receive such a request, prior to releasing any information, you should immediately contact Legal for assistance. Nothing in this section limits an employee's right to voice a concern to any governmental agency related to their work environment or as provided for, protected under or warranted by applicable law.



### Contact with the media and public

During the course of your job duties, you may receive a request for information or comment from a member of the news media, perhaps related to our operations or current company events. In such instances, if you are asked to provide an official statement on behalf of the company, you should direct media requests to **Corporate Communications** at (319) 786-4040 (Iowa or Minnesota) or (608) 458-4040 (Wisconsin).



## Thank you for living our Values and Code of Conduct

Thank you for your commitment to our organization. Our reputation for integrity, safety and caring for others is reflected in our Code of Conduct. We urge you to review the Code thoroughly and while it cannot address every situation, the Code can serve as a guide as to what behaviors are acceptable and when concerns or situations should be reported to your supervisor, Human Resources, or the Compliance/Legal department. Thank you for being a part of our team. We will continue to succeed because of your commitment to make integrity and proper business conduct the foundation of our business

The Board of Directors has the authority to grant any waivers of this Code of Conduct for executive officers or directors. Any waivers will be publicly disclosed and consistent with Securities and Exchange Commission rules and the listing standards of the stock exchange on which Alliant Energy's stock is listed. To date, the Board of Directors has not granted any waivers.

This Code of Conduct does not eliminate or modify in any way the employment at-will status of Alliant Energy employees. The policies set forth in the Code of Conduct are not intended to create a contract of employment between the company and employees.

Nothing contained in the Alliant Energy Code of Conduct is intended to interfere with or deny rights under any local, state or federal laws or regulations, and employees may exercise their rights to initiate and/or participate in investigations or proceedings by federal, state or local governmental agencies without fear of reprisal or retaliation.

