



Code of Conduct

LETTER FROM HEATHER Rosentrater



PRESIDENT AND CHIEF EXECUTIVE OFFICER
AVISTA CORPORATION

At Avista, our mission is to enable vibrant communities through energy. We do this by compassionately serving our customers with innovative and sustainable solutions, while holding true to our long-standing history of being trustworthy, innovative and collaborative. For over 135 years, these values have served us well.

Our people and our culture are at the heart of who we are as a company -- united by our diverse backgrounds, experiences, and perspectives that contribute to our shared success. And how we do our jobs is just as important as what we do. We act with integrity because it matters.

Avista's Code of Conduct (Code) outlines the expectations for how we work. It defines our culture, reflects our values, and provides a common framework to help guide our actions as we interact with others, conduct our business, and serve our customers and communities.

Our ongoing success depends on each of us to speak up when there is a concern. We know it takes courage to come forward and you can be confident our leadership team is listening to any and all concerns. Any form of retaliation against anyone who reports a concern will not be tolerated.

Each of us has a personal responsibility to follow our Code of Conduct -- both in letter and in spirit -- to help support an ethical, vibrant, and engaging workplace. I want to thank you for your continued commitment to our company and for modeling the values that are fundamental to our success.

What we do and why we do it

MISSION

We enable vibrant communities through energy.

Safely. Responsibly. Affordably.

We put those we serve at the center of everything we do.

Our aspiration that guides our decisions

NORTH STAR

We are a community-based, essential energy company striving to compassionately serve our customers with innovative and sustainable solutions, while delivering competitive returns.

The principles and beliefs that drive us

OUR VALUES

Trustworthy

Our word is reliable; we act with integrity.

Innovative

We continuously improve and find better ways to get things done.

Collaborative

We are respectful and we are at our best when working together to achieve results.



From our beginnings, when ten visionary business men saw an opportunity to harness the power of lower Spokane Falls for local prosperity, to today, our commitment to community remains unwavering and continues to propel us forward.

By building on our history and living our values as One Avista, we become even stronger as we embrace the future.

Heather Rosentrater

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OUR CULTURE & VALUES



ETHICAL WORKPLACE

Our commitment to ethical and responsible business practices is embodied in our Values, Code of Conduct, and compliance with the laws, rules, and regulations that govern our business.

Avista's Code outlines the activities and behaviors that are appropriate when conducting business and sets expectations for our conduct.

It is important to use good judgment in everything we do and ask for help if the right decision or course of action is unclear.

At Avista, we communicate respectfully and directly with accurate and timely information on matters of importance. We value open communication and constructive conversations in a professional environment where

employees and others can ask questions and respectfully express their opinions and concerns.

Personal Conduct

All employees are responsible for following our Code of Conduct.

As a company, we are at our best when working together to achieve results in an atmosphere of mutual respect, inclusion, and collaboration. We treat others with respect and conduct ourselves in a lawful, courteous, and professional manner.

While working, employees are expected to devote their time and efforts to Avista's business interests. This includes meeting expectations as outlined in Avista's Hybrid Work Policy where applicable.

Because we are often recognized within our communities, we

must be aware of our actions and avoid situations which give the appearance of misconduct or have the potential to harm Avista's reputation.

Who this Covers

The Code applies to all of us including our Board of Directors. We hold ourselves to the highest ethical standards and expect our business partners, suppliers, contractors, agents and others working with or on behalf of Avista to meet the same standards. Everyone has the same responsibility to follow this Code.

Learn More:
[Hybrid Work Policy](#)



A woman with long dark hair, wearing a light pink blouse and a necklace with a gold pendant, is seated at a white table. She is smiling and gesturing with her hands as if speaking. Another woman with curly hair, wearing a blue top, is seated across from her, seen from the back. The background shows a window with a view of a city.

**SPEAKING
UP**

If You See Something, Say Something

Upholding Avista’s well-earned reputation as an ethical and trustworthy company is a responsibility we all share.

Avista depends on each of us to speak up. If something isn’t right, we have an obligation to report concerns promptly, truthfully, and in good faith.

We know it takes courage to come forward. You don’t have to have all the details to raise a concern. You can trust your report will be treated seriously and fairly.

Reports of misconduct will be investigated thoroughly, disclosing information only to those who need it to resolve the issue. If something needs to be corrected, we’ll take action based on what we learn.

If asked to participate in an investigation, your full cooperation is required. Any intentional deception or dishonesty will be treated as a violation of this Code.

Reporting a Concern

There are several ways to report a concern. You are encouraged to discuss the issue with your leader. Often the conversation will provide the additional information needed to answer any questions. It will also initiate corrective action if required.

If you are uncomfortable talking with your leader, you may raise your concern to a Human Resources Manager or to the Ethics & Compliance or Legal departments. As an alternative, a Confidential Hotline is available as an anonymous way to raise misconduct concerns.

Zero Tolerance for Retaliation

We understand you might be uncomfortable or anxious speaking up. Rest assured, Avista will not tolerate any retaliation for:

- Raising a potential misconduct concern in good faith
- Participating in an investigation
- Refusing to do something that violates our Code of Conduct, Avista policies, or the law

Anyone who retaliates against another person will be subject to discipline, up to and including termination. If you feel you have been retaliated against, you need to speak up.

Reporting Options



Phone: 1-877-861-6690



Web: avistacorp.ethicspoint.com



Email:
ethics&compliance@avistacorp.com
humanresources@avistacorp.com
legaldepartment@avistacorp.com



Mail: Avista Utilities
Human Resources
P.O. Box 3727
Spokane, WA 99220

You can always raise concerns with your leader or any Avista leader.

Retaliation can take on many forms

- Actual harm or physical intimidation
- Verbal abuse, threats, negative gossip
- Derogatory comments
- Disclosure of confidential information
- Exclusion from work and social activities

MAKING ETHICAL DECISIONS

Making ethical decisions may be tough when faced with a difficult or challenging situation. While our Code of Conduct won't tell us what to do in every situation, it will help guide your decision-making when navigating complex legal, ethical, or policy issues.

Avista relies on your good judgment when putting our Code into action. The Making Ethical Decisions guide is a useful tool if there are questions about what steps to take.

If you need assistance or additional guidance in determining the right course of action, speak with your leader, another Avista leader, a Human Resources Manager, or the Ethics & Compliance or Legal departments.

Learn More:
[Making Ethical Decisions](#)

When faced with a difficult decision, follow these steps:

1**Stop**

Acknowledge your instincts if this decision feels different from other situations that you have faced. Take time to consider your options.

2**Think**

Consider the possible outcomes. Is your approach aligned with Avista's culture and Values in our Code of Conduct?

3**Ask**

Will your decision build trust and confidence? Ask for input and seek help if needed.

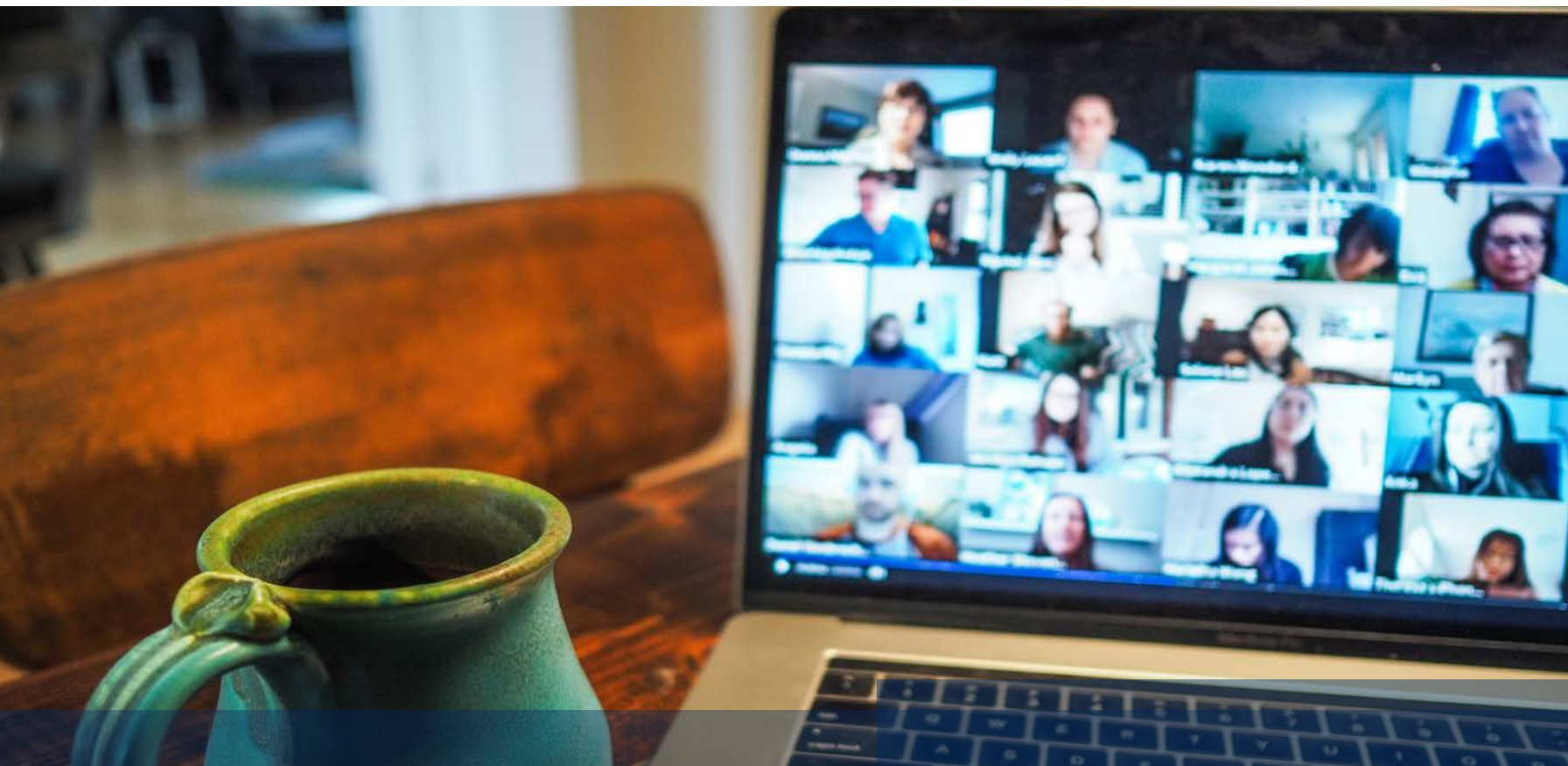
AVISTA LEADERS

Avista leaders have a special responsibility when it comes to our culture and the work environment of their teams. Leaders are held to a higher standard. They are expected to lead by example and to demonstrate a steadfast commitment to ethical business practices while serving as role models to the rest of the Company.

Leaders are responsible for upholding the Code and integrating ethical and lawful conduct into their areas of operation. This includes ensuring that our Code is understood and followed in their work groups. They are responsible for maintaining open communication channels and creating a positive, productive and safe working environment where employees and others feel comfortable coming forward with questions or concerns. This includes encouraging constructive conversations and gathering input from diverse perspectives while recognizing there is a time, place, and proper venues for all employees to respectfully express their opinions and concerns.

Leaders are also responsible for responding to concerns, providing guidance and reporting or addressing misconduct and unethical behavior. They are obligated to immediately inform their leader, Human Resources Manager, or the Chief Ethics & Compliance Officer of any actual, potential or suspected violations of this Code or other Company policies. Leaders who fail to report misconduct that they know about (or should have known about) may be subject to discipline up to and including termination of employment.

At Avista, our leaders include those with managerial responsibilities who supervise direct reports. You are also considered a leader if you manage projects or oversee contract workers.



Lead by Example

- Create a culture of trust and integrity
- Communicate the importance of ethics and compliance
- Develop a culture where employees feel safe speaking up
- Promote open and respectful communications
- Take prompt corrective action when needed
- Listen with an open mind; be accepting and inclusive of diverse viewpoints

At Avista, our decisions and actions are built on integrity, honesty and compliance. This means we are expected to:

- Integrate Avista's expectations into every aspect of our performance.
- Speak up when we see possible violations of the Code, Avista policies, and legal or regulatory requirements.
- Be truthful and cooperate fully in any internal investigations. Do not conceal or destroy information.

National Labor Relations Act

Avista's Code of Conduct should in no way be interpreted as interfering with the rights of employees granted under Section 7 of the National Labor Relations Act (NLRA) which guarantees employees the right to form, join, or assist unions, or engage in other concerted activities for their mutual aid and protection. Our Code of Conduct should in no way infringe on the rights of Avista employees to discuss the terms and conditions of their employment with other employees of Avista, as granted under the NLRA.

Violations

Violations of this Code, Company policies, or applicable laws and regulations will not be tolerated. Employees will be subject to disciplinary action, up to and including termination of employment. Such violations may also result in criminal and/or civil liability. Failing to read the Code or acknowledge that you understand your obligations does not excuse you from fulfilling your responsibilities.

Recovery & Recoupment

Avista's Recovery and Recoupment Procedure outlines provisions for the recovery of wages, reimbursements, benefits, company assets, and funds an employee receives during employment in certain situations such as overpayment of wages or failure to return company property to the extent permitted (or required) by law and by Company policies.

UPHOLDING THE CODE

Oversight & Waivers

Avista's Ethics & Compliance Program promotes corporate ethics and compliance with the laws and regulations that govern our business. This Program and our Code of Conduct are endorsed by and have the full support of our Board of Directors. Avista's executive management and the Board of Directors are responsible for overseeing the Program and compliance with the Code. Only the Board of Directors or a Board committee to which the responsibility has been delegated may waive a provision of the Code for any Board member or executive officer. Such waivers will be promptly disclosed to the investment community and the public as required in Avista's Policy on Fair Disclosure.



OUR WORKPLACE

AVISTA'S CODE OF CONDUCT



Anti-Harassment & Non-Discrimination

Avista is committed to a work environment where all individuals are treated with dignity and respect.

We believe that diversity in our backgrounds, experiences, and perspectives makes us stronger as a Company and a community. We strive to create an inclusive culture that values trust, respect and diversity in an environment free from discrimination, harassment and retaliation.

Protecting our workplace is everyone's responsibility. If you witness harassment or discrimination or believe that you have been a victim, you need to act promptly to report your concerns. Retaliation against someone for reporting such concerns is prohibited.

What is Discrimination?

Unfair or unequal treatment of an individual based on:

- Religion
- Race or Color
- Sex (including pregnancy)
- Sexual Orientation
- Gender Identity or Expression
- Age
- Marital Status
- Disability
- National Origin
- Any other classification protected by law

Harassment and Discrimination Examples

- Unwelcome remarks, gestures or physical contact
- Offensive or derogatory comments or jokes
- Display or circulation of offensive, derogatory or sexually explicit pictures or other materials
- Unfair or unequal treatment of an employee, particularly those classifications protected by nondiscrimination law

Additional Leader Responsibilities

Leaders are responsible for ensuring that discrimination or harassment does not occur within their work area. They are held to a higher level of responsibility and expected to report misconduct should they become aware of an instance of discrimination or harassment anywhere within Avista. Humiliating, insulting, degrading or spreading malicious gossip about someone in our workplace will not be tolerated.

Learn More:

[Anti-Harassment and Non-Discrimination Core Policy](#)



Workplace Safety

We value the safety of our employees, as well as the public who live and work near our facilities. Each of us plays a vital role in creating a safe work environment at all times, looking out for each other, and maintaining safe facilities for years to come.

Work must be performed in a safe and efficient manner consistent with established work practices, processes, and procedures. By approaching a task with a safety mindset, employees demonstrate the type of safety leadership and accountability expected at Avista.

If you see a situation that may put others at risk, you are responsible to take immediate action to keep yourself, your coworkers and the public safe. Avista's Authorization to Stop Work gives you the authority to stop work without fear of reprimand or retaliation. You are also key in learning from near misses to prevent future incidents and address hazardous situations to protect workers and the public.

Avista's Safety Management System (SMS) is a comprehensive framework which enables a systematic and deliberate approach to managing all aspects of safety, including the necessary organizational structures, accountabilities, policies and procedures.

We also have the Incident Prevention Manual (IPM) which focuses on Avista's worker safety, including our safety commitment, expectations, safety rules and practices. Additionally, our Vehicle Use Policy outlines employee responsibilities and is designed to ensure the safety of employees and the public, while employees are driving during the course of business.

Any suspicious or unsafe conditions should be immediately reported to your leader, the Safety Department, Security or a Human Resources Manager.

Public Safety

Our communities rely on us to provide safe and reliable energy services. To ensure public safety, we have safety-related policies and public-facing programs designed to prevent, detect, and respond to hazardous situations. While working in the field or with the public, if you encounter a situation where someone is unaware of a potential safety hazard, it is vital that you speak up. Make sure the individual understands the risks and dangers at hand and direct them to additional safety-related information as needed.

Learn More:

[Incident Prevention Manual](#)

[Vehicle Use Policy](#)

[Public Safety Information](#)



Workplace Anti-Violence & Security

We are committed to providing a safe, secure, and productive work environment that is free from threatening or violent acts. Inappropriate conduct or threatening behavior is prohibited and will not be tolerated.

Examples of inappropriate or threatening behavior can include:

- threats, harassment, abuse, stalking
- intimidation and threatening gestures
- hitting, touching, shoving, kicking, vandalism

Dangerous weapons that can be used for the purpose of injuring another individual are strictly prohibited.

Our employees are Avista's best line of defense. Be alert to what is happening around you, follow Avista's security practices, and speak up about any threats or potential violence. Employees must wear their badge with their picture clearly visible unless it presents a safety issue in which case the employee must have their badge on their person or in the immediate vicinity.

If you encounter a threatening situation or person, call 911 immediately and take the necessary actions to stay safe.

If you observe an individual exhibiting inappropriate or unusual behavior or you believe an individual has accessed an Avista workplace without authorization, it could be a sign of a potentially dangerous situation, and you must immediately inform your leader, Security or Human Resources.

Learn More:

[Workplace Anti-Violence Core Policy](#)



Fitness for Duty

We are committed to excelling as a high-performance organization. An energetic and motivated workforce is key to our success. As employees, we are accountable for our work results and we are committed to giving our full effort in everything we do.

Employees are required to come to work ready and able to perform their responsibilities free from the effects of drugs or alcohol throughout the entire time they are working. Employees who are not fit for duty present a serious safety risk to themselves and others.

The Fitness for Duty Alcohol & Controlled Substances Core Policy outlines Avista's requirements to maintain a positive, productive, and safe work environment.

Possessing, using or distributing alcohol or illegal drugs is prohibited. Employees are expected to be familiar with and follow this Core Policy.

For employees, their dependents, or household members who may have a personal concern or situation affecting their life, such as drug or alcohol use, marital and family issues, financial difficulties, emotional concerns or stress, assistance is available through the Employee Assistance Program (EAP).

Workplace Gambling

To comply with gambling laws, employees are not allowed to participate in any form of gambling for money or other items of value at work or during working hours. Gambling is prohibited while on Company property or when conducting Company business.

Avista prohibits the use of our computing networks or any Avista supplied electronic devices, such as computers, tablets and mobile phones, to access gambling sites or to engage in any gambling activities. These restrictions include, but are not limited to, sports betting, fantasy sports, raffles, lotteries, cards, dice games and online gaming or gambling websites.

Additional Leader Responsibilities

Avista's leaders are responsible for monitoring the attendance, performance and behavior of their employees. They are provided with training on Reasonable Suspicion and Drug Awareness which is designed to help leaders recognize and respond when employee performance appears to be unsafe, ineffective, inappropriate or the behavior conflicts with the requirements of this Policy. Leaders are expected to apply provisions of this Policy to ensure a healthy and safe workplace at Avista.

Learn More:

[Employee Assistance Program \(EAP\)](#)

[Fitness for Duty - Alcohol and Controlled Substances Core Policy](#)

[Workplace Gambling Quick Reference](#)

Equal Employment

Our employees are a key source of our competitive edge. We strive to hire and retain talented people who are innovative and skilled so we can continue to provide safe, responsible, and affordable service to our customers while moving the Company forward. We are committed to cultivating a workplace of acceptance and mutual respect that values equity, inclusion, and diversity in all aspects of our operations.

This commitment includes equal employment opportunities to all qualified individuals and fair employment practices everywhere we operate in all areas of recruitment, employment, training, work assignments, working conditions and promotions.

Learn More:

[Equal Employment Opportunity Commitment](#)
[Our Commitment to Human Rights](#)

Human Rights

Avista is committed to the advancement and protection of human rights. We believe that anyone employed by Avista or Avista's contractors and business partners should be treated with dignity and respect, paid a fair wage based on applicable law, and assured of safe working conditions.

Our commitment is consistent with all U.S. human rights laws and regulations and the general principles set forth in the International Labour Organization Conventions and the United Nations Universal Declaration of Human Rights.

Respect for human rights is fundamental to how we operate our Company. We do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced or prison labor or human trafficking. We expect our suppliers to share our commitment to the same high standards.



OUR BUSINESS PRACTICES

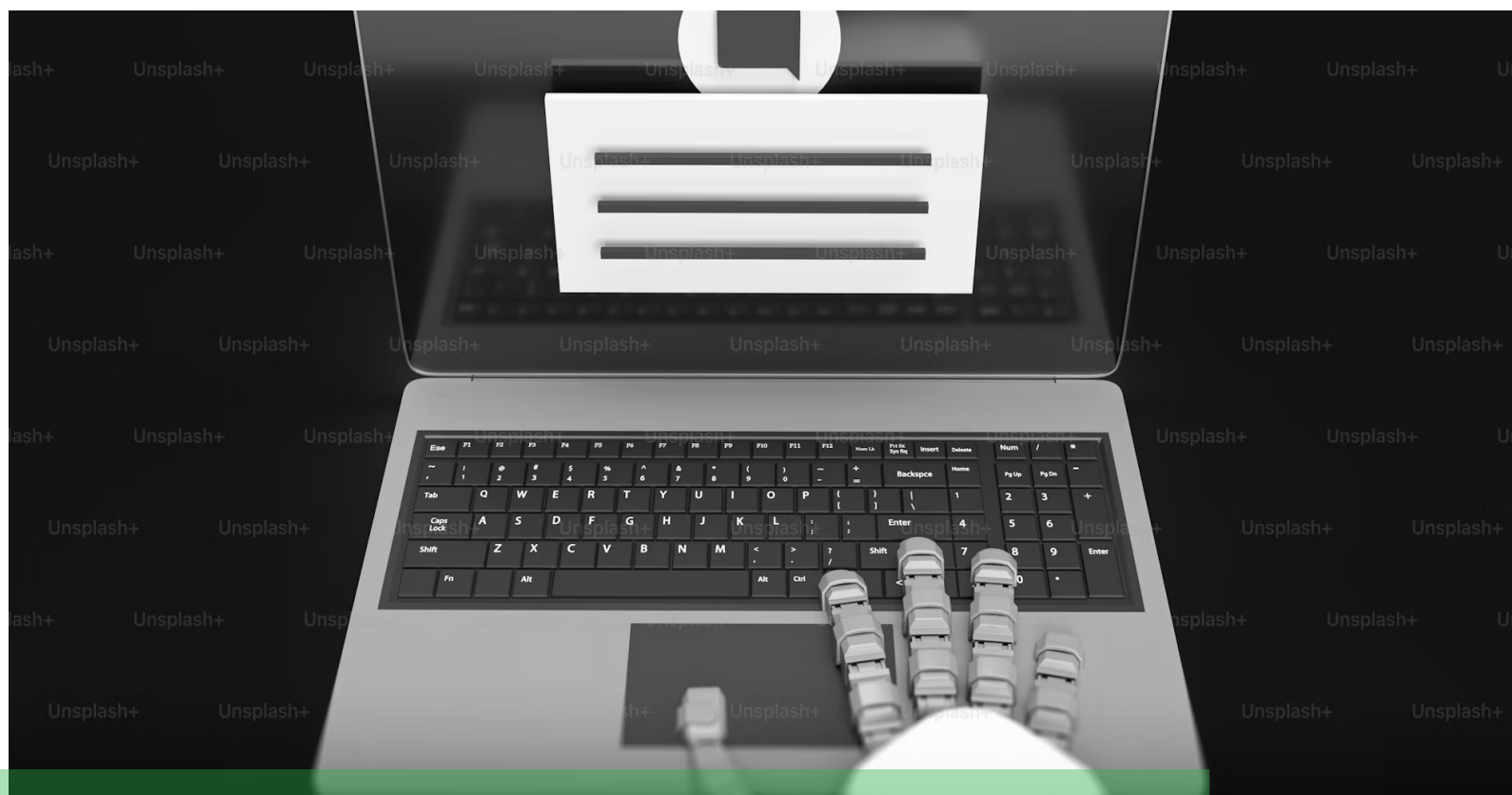


Company Assets

Our assets include everything that Avista owns or uses to conduct business. We must safeguard these assets and ensure they are being used properly, safely, and efficiently. Company assets are to be used for appropriate business purposes only.

We are expected to take great care to protect the Company's equipment, tools, supplies and materials from loss, damage, theft, misuse and waste. When assets are no longer useful, they must be disposed of in accordance with established procedures. There may be rare occasions where a leader may dispatch resources to support another Avista employee; however, under no circumstances should any employee direct Avista resources to complete work that supports them personally.

Company assets also include non-physical items and resources such as strategies, inventions, developments, and ideas about how to perform our work. These non-physical assets must also be protected and used only for the benefit of Avista.



Technology Resources

We must be vigilant to ensure that our technology is secure and to protect Avista and our business partners from illegal or damaging actions. Avista's cybersecurity practices are designed to protect our networks, computer programs and data from attack, damage, and unauthorized use. It is critical that you follow the guidance outlined in our Security Awareness Training and further detailed in our Technology Resources Core Policy.

Avista's technology resources are provided for use in connection with our job duties. Avista prohibits the use of technology resources for any inappropriate or unlawful purpose and in any way that violates Avista's policies, violates the law, or has the potential to damage Avista's image or business interests.

All forms of electronic communication, whether business or personal, that are created using Avista's technology resources, may be monitored, retained or reviewed internally, externally and during legal proceedings. This includes emails, data, facsimiles, recorded telephone conversations, social media posts, instant messages, and any other forms of communication regardless of topic.

This Core Policy extends to personal devices used to access Avista's technology resources. Employees should not have any expectation of privacy or exemption from review. If an employee wants to keep something private, Avista's technology resources should not be used.

Learn More:
[Generative Artificial Intelligence \(AI\) Policy](#)
[Technology Resources Core Policy](#)

Conflicts of Interest

We are committed to conducting business in a manner that ensures Avista's business decisions are not influenced by personal interests. Employees have a duty to act in Avista's best interests and avoid even the appearance of a conflict of interest. Employees may not utilize Avista resources and must ensure that any personal activities do not interfere with their work responsibilities.

Conflicts of interest can arise when an employee has financial interests, personal relationships or working relationships that interfere, or appear to interfere, with their ability to perform work objectively. In some cases, this may apply to the interests or activities of family members.

If an employee discovers that a personal interest, investment, or association may create a potential conflict of interest, they have a responsibility to seek guidance from their leader, Human Resources, Ethics & Compliance or the Legal Department. Formal disclosure may be required. Having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.

Board Appointments & Advisory Roles

While employees are encouraged to actively participate in the community, they should avoid roles as board members or advisors with Avista's competitors or business partners when their involvement could influence, or appear to influence, their decision making. Approval by Avista's General Counsel is required for any employee to serve on a board or advisory position with any for-profit organization. Approval is not required for non-profit institutions or trade organizations.

Conflict of Interest Considerations

- Does a friend or relative stand to benefit?
- Could my participation in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of Avista's interests?
- Do my outside interests influence or appear to influence my ability to make business decisions?

Corporate Opportunities

Employees may not take advantage of business or investment opportunities they become aware of through their work at Avista. Such opportunities belong first to the Company unless otherwise agreed to by Avista.

Financial Investments & Arrangements

In general, investments in publicly-traded or privately-held businesses will not create a conflict of interest unless you or your relatives have an ownership, beneficial or financial interest in a business or organization with whom Avista has a relationship, competes or does business such as a supplier, customer, business partner or competitor. If you have discretionary authority in dealing with another company as part of your job or you own more than ten percent of that company's issued and outstanding equity securities, you must obtain General Counsel approval. Employees must also disclose compensation arrangements with Avista or its subsidiaries such as commissions, royalties, honoraria, fees, grants, loans, scholarships, stipends, or other direct or indirect benefits.

Outside Activities

Employees may participate in professional organizations and community activities provided it does not interfere with the employee's performance of their job at Avista or utilize Avista resources. Approval may be required by General Counsel if Avista has a relationship, competes, or does business with the organization. Similar approval may be required for presentations outside the Company if the individual is identified as an employee and they will receive payment or expense reimbursement.

Outside Employment

Employees may engage in work or provide services outside Avista provided it does not interfere with their ability to do their job. Such employment may not occur during their scheduled work hours, at Avista premises or facilities, or utilize Avista's technology or resources. This includes self-employment or any positions as an owner, director, trustee, officer, employee, or consultant. Approval may be required by General Counsel if Avista has a relationship, competes, or does business with the organization.

Personal Relationships

Relatives and others with personal relationships to Avista employees may be employed by the Company provided such employment does not create a conflict of interest or interfere with Avista's operations. Employees are expected to disclose their relationships with Avista employees, suppliers, competitors and business partners to their leader.

Learn More:

Conflicts of Interest Quick Reference
Employment of Relatives and Personal Relationships
Outside Employment Policy

Supplier Relations

Our suppliers and contractors are an important extension of our operations. We rely on these relationships and expect our suppliers to share our commitment to conducting business with the highest level of integrity.

We select our suppliers and contractors based on their proven track record, qualifications, reputation, value, and other merits. Our procurement decisions also reflect consideration for sustainability, economic and social impacts.

When working with suppliers and contractors, employees may not:

- Provide anything of value in exchange for proprietary or confidential information.
- Take receipt of any illegally obtained information.
- Use illegally obtained information to the disadvantage of our business partners.
- Publicly endorse products, services or those who supply them without approval from Supply Chain Management and the Legal Department.

If you are in a position to influence contracting or buying decisions, you may be vulnerable to potential conflicts of interest. Check with your leader, Ethics & Compliance or the Legal Department for guidance.



Antitrust & Competition

Antitrust laws are designed to ensure that business is conducted in an open, competitive atmosphere and that competition is not unreasonably or unfairly restricted. We are committed to treating our business partners with respect and competing fairly in the marketplace.

We act honestly, fairly and in good faith in all dealings at all times and with all people whether our customers, suppliers, competitors, employees or others.

Engaging in unfair methods of competition or deceptive acts or practices is strictly prohibited. This includes taking advantage of anyone through misrepresenting material facts, manipulating or concealing information, abusing privileged information, or engaging in any other unfair practice.

Any information that we obtain about our competitors, suppliers or others, including any former employees, will be gathered through ethical and legal means and the confidentiality of such information shall be respected.

Learn more:
Supply Chain Procedures

Gifts & Entertainment

We strive to build good relationships with our suppliers, contractors, customers, and business partners. In doing so, we must maintain the integrity of our business dealings and remain impartial, objective, and free from outside influence.

The giving and receiving of gifts or entertainment should be rare and nominal in value. Such exchanges can create a real or perceived sense of obligation. If you are offered or receive a gift, you should decline or return it if at all possible; otherwise, donate the item to charity or share with your co-workers. Cash or cash equivalents (gift cards, certificates, securities) are never allowed.

You may not solicit gifts from our suppliers, contractors, or business partners. Employees are expected to report any gifts or entertainment that are given or received that might reasonably be regarded as influencing or having the potential of influencing their actions concerning Avista's business.

Appropriate Gift Giving & Receiving

Appropriate and valid business purpose

Reasonable for the occasion and your role at Avista

Infrequent and nominal in value

Not given in an attempt to influence a decision

Consistent with the law

Anti-Bribery & Corruption

All business dealings on behalf of Avista are conducted in a transparent manner that does not compromise our integrity or harm our reputation. Bribery, kickbacks, or improper payments to anyone under any circumstance is never allowed.

A bribe can be anything of value (discounts, products, connections and more) that is offered, given, solicited or received in exchange for an advantage that would not otherwise be received.

We must conduct our business ethically and in compliance with anti-bribery and corruption laws, including those governing interactions with government officials and the Foreign Corruption Practices Act.

Employees engaged in domestic or international activities on behalf of Avista, are expected to understand the applicable law and ensure all related transactions undertaken by the Company are in compliance.

We will never ask anyone to engage in any activity that breaks the law, violates regulatory rules, or is contrary to the values and expectations outlined in this Code.

Learn more:

Anti-Bribery and Corruption Policy

Bribery and Corruption Quick Reference

Gifts & Gift Card Policy



Confidential Information

We are committed to protecting confidential information and respecting the privacy of our customers, employees, and others with whom we conduct business.

Confidential and proprietary information generated by Avista is an important Company asset that we must treat with care and protect from disclosure to any person or entity unless authorized by the Company or legally mandated.



While some confidential information may be specifically labeled as confidential or proprietary, other non-public information that has not been released to the public must also be protected.

This includes the confidential information of our business partners, suppliers, customers or others related to our Company.

Employees may not share confidential information and should be mindful of casual conversations in public that may be overheard by others.

Confidential information acquired during the course of your employment with Avista may not be used for your personal benefit. Your obligation not to disclose confidential information continues even after your employment or working relationship with Avista ends.

When faced with legal requirements to provide confidential information, Avista will verify whether the demands are valid and otherwise comply with the rule of law.

Learn more:
[Confidentiality, Non-Solicitation and Invention Assignment](#)
[Customer Information Privacy Policy](#)

Confidential Information Examples

- Intellectual Property
- Ideas, Techniques, Inventions
- Data, Designs, Drawings
- Financial Information and Business Strategies
- Employee and Customer Information

Employee Information

We respect every individual's right to privacy and we are committed to protecting sensitive personal employee information in a confidential manner. This includes personal medical, family, and financial information obtained during and after your employment with Avista. Only authorized personnel have access to your sensitive information which may be used only for legitimate business purposes.

Customer Information

To serve our customers, we collect and store private information such as name, address, phone, service type, personal identifiers and payment history. We are committed to safeguarding the privacy of this information which must be used only for internal business purposes. Only authorized and trained personnel are allowed access to customer account information.

Intellectual Property

Innovation and information pave the way to competitive advantage and business success. We protect the value of our ideas and information through the use of patents, copyrights, trademarks, trade secrets, logos, and other forms of intellectual property rights which belong to Avista.

You have a responsibility to follow Avista's policies on inventions and ownership and to safeguard our intellectual property from unauthorized disclosure as outlined in the Confidentiality, Non-Solicitation and Invention Assignment Core Policy. This extends to information and ideas that belong to the companies with whom we do business.

Consult with your leader or the Legal Department if you have questions regarding how to identify, report, handle or protect Avista's intellectual property.

Examples of Intellectual Property

Business strategies and plans

Discoveries and developments

Inventions and ideas

Concepts and designs

Processes and improvements

Computer programs

Records Management

Avista's information and business records, whether confidential or non-confidential, serve as evidence of our business activities, transactions, decisions, and operations. This includes all information, data, communications, and documents created or received by Avista.

You are responsible for maintaining the confidentiality of our records and any proprietary or sensitive information throughout the record life cycle. It is unacceptable to prepare records or reports that intentionally mislead, omit, or delete important information from the record. Likewise, it is against Company policy to intentionally and unlawfully destroy, mutilate, alter, or conceal any evidential records.

If you produce, receive, or store records of any type, you have a responsibility to know and follow Avista's Records Retention Policy to ensure proper creation, retention, and destruction of those records in your care in compliance with legal and regulatory requirements. This includes special handling of records that may be relevant to active or possible litigation.

Learn more:

Confidentiality, Non-Solicitation and Invention Assignment
Records Retention Policy



Accounting & Financial Records

We have a responsibility to maintain accurate records of Avista's transactions in a timely manner and with reasonable detail to provide a fair and true view of the Company's financial position. Our records help us to fulfill our financial commitments and are the basis on which we make strategic business decisions.

You are expected to timely and accurately record time worked, expenses incurred, and funds received on behalf of the Company in accordance with Avista's Regulatory Accounting Guidelines and Policies as well as applicable laws, rules, and regulations that govern our accounting practices and reporting.

Employee Expenses

Avista reimburses employees for the actual costs of reasonable expenses incurred during the normal course of work as outlined in the Travel and Expense Reimbursement Policy, Corporate Credit Card Policy, and Gifts & Gift Card Policy. All business expenses must be accurately categorized, approved, and submitted within the required timeframe of the policy through the iExpense reimbursement or the credit card reconciliation process.

Subsidiary Interactions

We must ensure that only legitimate business costs associated with providing energy services are passed along to our customers in their energy rates. Business interactions between Avista and its subsidiaries, such as Alaska Electric Light and Power, must be accurately recorded to reflect all costs to the appropriate company to avoid misallocation of costs between the entities.

Additionally, the existence of contracts or services between Avista and any affiliate or subsidiary is subject to regulatory requirements as outlined in the Reporting of Affiliated/Subsidiary Interest Contracts or Services.

Learn more:

[Corporate Credit Card Policy](#)

[Gifts & Gift Card Policy](#)

[Regulatory Accounting Guidelines & Policies](#)

[Regulatory Accounting Procedures](#)

[Reporting of Affiliated/Subsidiary Interest Contracts or Services](#)

[Travel and Expense Reimbursement Policy](#)



OUR COMMUNITY & INVESTORS



Corporate Communications

Information that we provide to the public, regulatory authorities and others must be consistent, accurate and complete. Avista has designated individuals to serve as Company spokespersons and official communication channels. Unless you are authorized to do so, you may not make any public statements on Avista's behalf. Refer media and external parties to Corporate Communications.



Avista Media Line

Avista strives to establish communication that is open, authentic, credible and professional. If you are contacted by the media, contact a communications manager:

24/7 Media Line
509.495.4174

Social Media

Social media is any internal or external technology platform that allows individuals to interact and share information.

Avista's social media technology is designed to support business collaboration, information exchange, and online learning. If you engage in social media networking, you must ensure your communications are professional. This includes avoiding posts that:

- are defamatory, threatening or intimidating
- might constitute harassment
- could contribute to a hostile work environment
- disclose someone else's private information

How you say something is as important as what you say. Avista's Social Media Policy outlines expectations when engaging in social media use - this includes external use, talking publicly about Avista, and internal communications.

Social media may not be used in any way that violates Avista's policies or practices, violates the law, is inappropriate, or has the potential to damage Avista's reputation or business interests. You must take special care to avoid releasing confidential or non-public information about Avista and you may not represent that you are speaking on behalf of the Company unless you are authorized to do so.

Regulatory Communications

Regulatory interactions and communication are coordinated through the Regulatory Affairs Department to provide continuity and consistency and to meet the needs of the regulators as promptly as possible. There may be times when employees need to communicate with a regulator. On those occasions, it is important that you work with Regulatory Affairs to provide adequate and accurate information and to work toward the best possible outcome for all stakeholders.

Legal & Regulatory Proceedings

When we are involved in legal or regulatory proceedings, we are not permitted to discuss these matters with those individuals who will be involved in the final decision making of the case itself. This may include administrative law judges, regulatory commissions and their advisory staff among others. The intent of these ex parte rules is to avoid the appearance of influence and to ensure all parties are afforded the same opportunity to participate in information exchanges. If you have questions about the legal requirements, contact the Legal Department.

Learn more:

Coordination of Company Communications and Media Policy
Coordination of Regulatory Communications
Social Media Policy

Environmental Stewardship

Environmental stewardship has always shaped our operations. We are committed to protecting and enhancing the environment by conducting our business in ways that honor the integrity of the natural resources in the areas we serve.

We set environmental objectives, monitor our performance, and implement and improve our programs based on practical stewardship in the best interests of the environment and our communities.

We design, build and operate our facilities to make efficient use of resources, promote sustainability, prevent pollution and avoid, reduce, or mitigate environmental impacts.

As employees, we must understand and comply with federal and state environmental laws and regulations. Together, we can support Avista's commitment to protecting human health and the environment throughout the course of our work.

Report Environmental Spills & Concerns

SPILL REPORT PHONE: 509-998-0996

Learn More:

[Our Commitment to Environmental Stewardship](#)



Insider Trading

We maintain the confidence of our investors and the public by respecting financial laws. In the course of your work, you may have access to material non-public information about Avista, our customers, or companies with whom we work. That knowledge makes you an insider.

Information is material if a reasonable investor would consider it important in deciding whether to buy, hold, or sell stock. Information is non-public if it has not been broadly released to the investing public. You may not use this inside information to buy or sell Avista stock. Trading on such information is against the law and carries severe consequences. Likewise, you may not buy or sell the stock of other companies if you have insider information about that company. Tipping is also a violation of insider trading laws. Tipping can occur if you provide someone else with non-public information and that individual buys or sells stocks based on the information that you provided.

Fair Disclosure

Our Policy on Fair Disclosure requires that any material non-public information is disclosed to the investment community and the public at the same time. This requirement is designed to ensure consistent and accurate messaging and to comply with legal disclosure requirements. Only those employees who have been trained and authorized as part of their normal work responsibilities are allowed to communicate with the investment community.

Learn More:

[Insider Trading Policy](#)
[Insider Trading Quick Reference](#)
[Policy on Fair Disclosure](#)

Community Involvement

We are invested in the communities we serve and pride ourselves on our commitment to being a responsible corporate citizen.

Our commitment to social responsibility is demonstrated through meaningful philanthropic support. The Avista Foundation serves as our primary charitable vehicle to help strengthen communities in which we live, work, serve, and play.

Employees are encouraged to volunteer their time, talents and energy to support our communities, provided such activities do not interfere with their work responsibilities.

When volunteering, you cannot represent the Company in any related transactions or make commitments on behalf of Avista.

Likewise, you may not use Company assets to carry out your volunteer activities without prior leader approval.

Political Activities

Avista is an active participant in the democratic process and pays close attention to political matters that may impact the Company and the communities in which we serve. We encourage everyone to participate in the political system and to vote for their own views.

If you are involved in any political activities, they cannot interfere with your normal work responsibilities, nor are you authorized to speak on behalf of Avista in any political activity or role.

Additionally, you may not use Company funds or assets for personal contributions of any kind to a political party or candidate for public office. This includes offering a gift, loan, favor or special service with the intent to influence a government official or process.

Avista will never apply pressure on anyone for personal contributions or services in pursuit of political activity.

If you have questions regarding political activities or involvement, contact Government Relations or the Legal Department.



Dennis Vermillion, CEO

*Serving Avista Since 1985
Enjoy Retirement!*

QUESTIONS & RESOURCES

Avista's Code is not a complete guide to every legal, ethical, or policy issue that may arise; it helps guide our overall commitment to doing what is right. While Avista relies on each of us to use our best judgment in carrying out our duties, there will be times when we have questions about how the Code applies or whether a particular action is consistent with the Code.

If you have questions, you should speak to your leader, a Human Resources Manager, Ethics & Compliance or Legal Department.

Questions & Concerns - Contact Us

| | | |
|---------------------|--------------|--|
| Human Resources | 509-495-2340 | humanresources@avistacorp.com |
| Ethics & Compliance | 509-495-4114 | ethics&compliance@avistacorp.com |
| Legal Department | 509-495-8687 | legaldepartment@avistacorp.com |

Confidential Hotline

Call 1-877-861-6690 or avistacorp.ethicspoint.com



Additional Resources

Ethics & Compliance on the Avenue / Inventory of Company Policies & Procedures
Code of Conduct Quick Reference





CORE POLICIES

Anti-Harassment and Non-Discrimination
Confidentiality, Non-Solicitation and Invention Assignment
Fitness for Duty Alcohol and Controlled Substances
Technology Resources
Workplace Anti-Violence

RELATED POLICIES & PROCEDURES

Anti-Bribery and Corruption Policy
Coordination of Company Communications and Media Policy
Coordination of Regulatory Communications Procedures
Corporate Credit Card Policy
Customer Information Privacy Policy
Discipline Procedure
Employment of Relatives and Personal Relationships
Equal Employment Opportunity Commitment
Generative Artificial Intelligence (AI) Policy
Gifts & Gift Card Policy
Hybrid Work Policy
Incident Prevention Manual
Insider Trading Policy
Our Commitment to Environmental Stewardship
Our Commitment to Human Rights
Outside Employment Policy
Policy on Fair Disclosure
Records Retention Policy
Recovery and Recoupment Procedure
Regulatory Accounting Guidelines and Policies
Regulatory Accounting Procedures
Reporting of Affiliated/Subsidiary Interest Contracts or Services
Social Media Policy
Supply Chain Procedures
Travel and Expense Reimbursement Policy
Vehicle Use Policy