



Code of Conduct

LETTER FROM HEATHER Rosentrater

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.

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

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

Our continued success depends on each of us to speak up when something doesn't seem right. We recognize that raising concerns takes courage and you can be confident that our leadership team is listening. Retaliation of any kind against someone who reports a concern will not be tolerated.

Each of us has a personal responsibility to uphold our Code of Conduct -- both in letter and in spirit -- to help foster an ethical, vibrant, and inclusive workplace. I want to thank you for your continued commitment to Avista and for living the values that are essential to our success.

PRESIDENT AND CHIEF EXECUTIVE OFFICER
AVISTA CORPORATION



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

TABLE OF CONTENTS

LETTER FROM HEATHER ROSENTRATER

OUR CULTURE & VALUES

Ethical Workplace	6
Personal Conduct	6
Speaking Up & Anti-Retaliation	8
Making Ethical Decisions	9
Avista Leaders	10
Upholding the Code	11

OUR WORKPLACE

Anti-Harassment & Non-Discrimination	13
Workplace Safety	14
Public Safety	14
Workplace Anti-Violence	15
Fitness for Duty	16
Workplace Gambling	16
Equal Employment & Human Rights	17

OUR BUSINESS PRACTICES

Company Assets	19
Technology Resources	19
Conflicts of Interest	20
Supplier Relations	21
Antitrust & Competition	21
Gifts & Entertainment	22

Anti-Bribery & Corruption	22
Confidential Information	23
Employee & Customer Information	23
Intellectual Property	24
Records Management	24
Accounting & Financial Records	25
Employee Expenses	25
Subsidiary Interactions	25

OUR COMMUNITY & INVESTORS

Corporate Communications	27
Social Media	27
Regulatory Communications	27
Legal & Regulatory Proceedings	27
Environmental Stewardship	28
Insider Trading	29
Fair Disclosure	29
Community Involvement	30
Political Activities	30

QUESTIONS & RESOURCES

Contact Information	31
Confidential Hotline	31
Policies and Procedures (Index)	32

OUR CULTURE & VALUES



ETHICAL WORKPLACE

At Avista, our commitment to ethical and responsible business practices is reflected in our Values, Code of Conduct, and compliance with the laws, rules, and regulations that govern our operations. The Code outlines the activities and behaviors that are appropriate when conducting business and sets clear expectations for our conduct.

It is important that we use sound judgment in all situations and seek guidance whenever the right decision or course of action is unclear.

At Avista, we encourage open and respectful communications, providing accurate and timely information on important matters. We value open dialogue and constructive conversations in a professional environment where employees

and others feel empowered to 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 excel when we work 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, you are expected to devote your time and efforts to Avista's business interests. This includes meeting expectations as outlined in Avista's Hybrid Work Policy where applicable.

Given our visibility in the communities we serve, it is important that we are mindful of our actions and avoid situations while working that could be perceived as 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.

Learn More:
[Hybrid Work Policy](#)





SPEAKING
UP

If You See Something, Say Something

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

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

We understand 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 thoroughly investigated, with information disclosed only to those who need it to resolve the issue. If corrective action is necessary, we will take the appropriate steps based on what we learn.

If your are 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.

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

Reporting a Concern

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

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

MAKING ETHICAL DECISIONS

Making ethical decisions can be challenging, especially in difficult or complex situations. While our Code of Conduct may not provide specific answers for every situation, it serves as a valuable guide to help you make informed decisions when navigating legal, ethical, or policy issues.

Avista trusts your good judgment in applying our Code in your daily work. The Making Ethical Decisions guide is a useful tool if you have questions about the appropriate 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, Ethics & Compliance Manager, or Legal Department.

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**

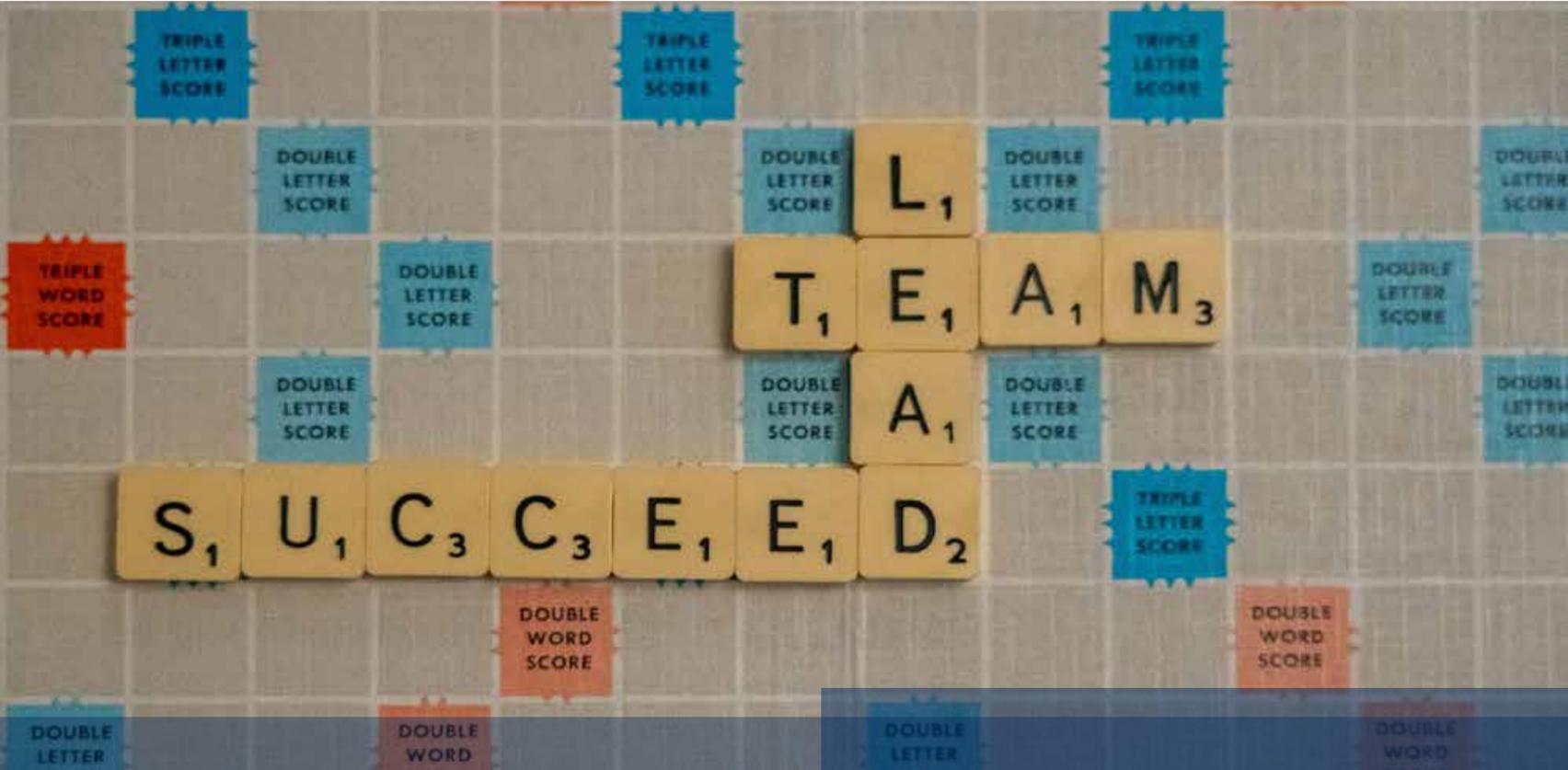
Will your decision build trust and confidence? Ask for input and seek help if needed.

AVISTA LEADERS

Avista leaders have a unique responsibility in shaping our culture and influencing the work environment of their teams. Held to a higher standard, they are expected to lead by example, demonstrate a steadfast commitment to ethical business practices, and serve as role models to the rest of the company.

Leaders are responsible for upholding the Code and embedding ethical and lawful conduct into their daily operations. This includes ensuring that our Code is understood and followed within their teams. Leaders are expected to foster open communications, create a positive and supportive work environment, and encourage employees and others to speak up with questions or concerns. They are expected to promote constructive conversations and seek input from diverse perspectives while guiding employees to express their views respectfully and in appropriate settings.

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



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

Our decisions and actions are grounded in 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, company 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.

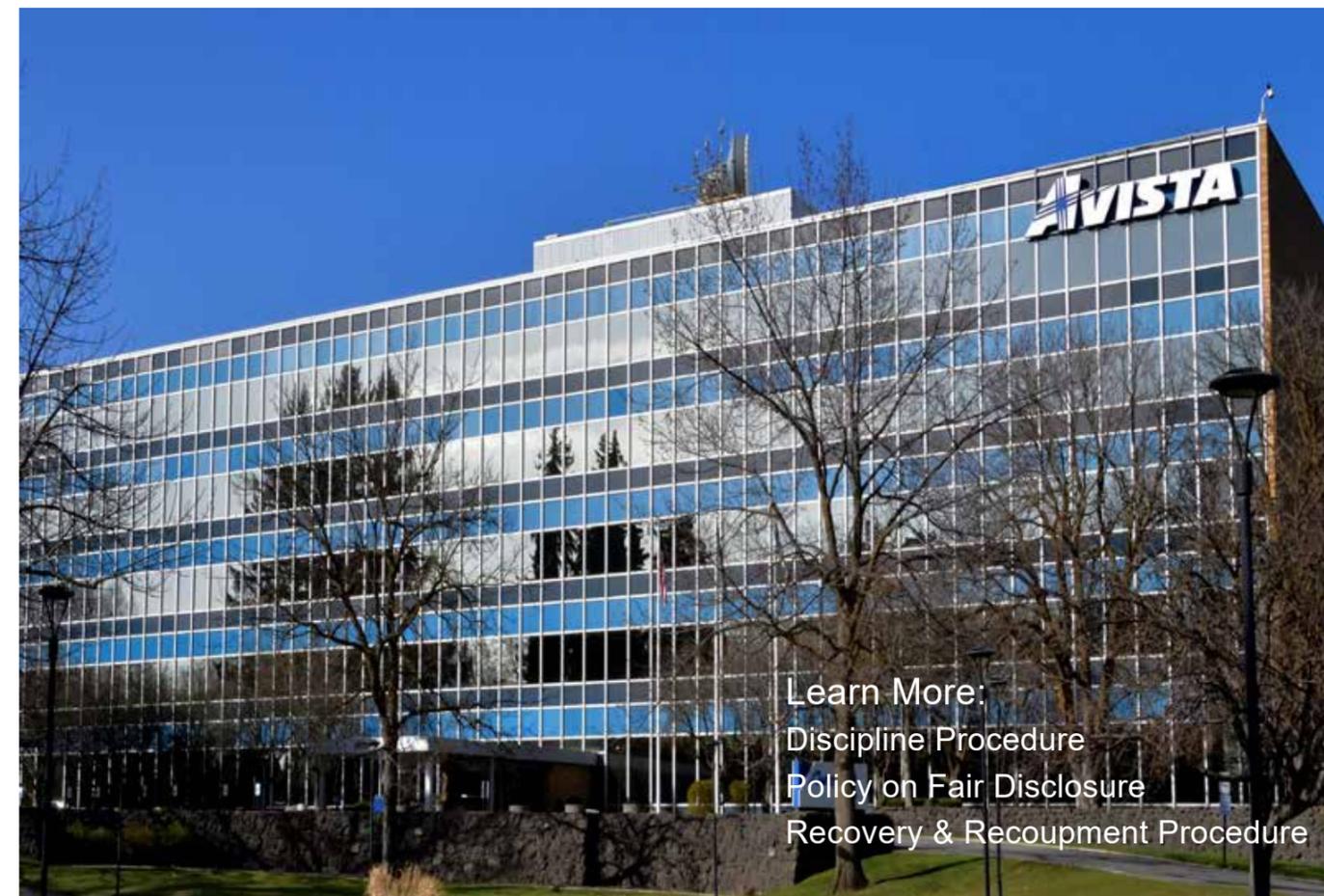
Recovery & Recoupment

The 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 executive management and the Board of Directors are responsible for overseeing compliance with the Code of Conduct. Only the Board of Directors or a Board committee to which the responsibility has been delegated may waive a provision of the Code of Conduct for any Board member or executive officer. Such waivers will be promptly disclosed as required by law or regulation outlined in Avista's Policy on Fair Disclosure.



Learn More:
[Discipline Procedure](#)
[Policy on Fair Disclosure](#)
[Recovery & Recoupment Procedure](#)

OUR WORKPLACE

AVISTA'S CODE OF CONDUCT



Anti-Harassment & Non-Discrimination

We are committed to fostering a work environment where every individual is 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 are dedicated to building an inclusive culture rooted in trust, respect and equity. Maintaining a workplace free from discrimination, harassment and retaliation is a shared responsibility -- and one Avista takes seriously.

If you believe that you have been treated unfairly or experienced behavior that does not align with our Code of Conduct, it's important to report your concerns promptly. Retaliation against anyone who raises a concern in good faith 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

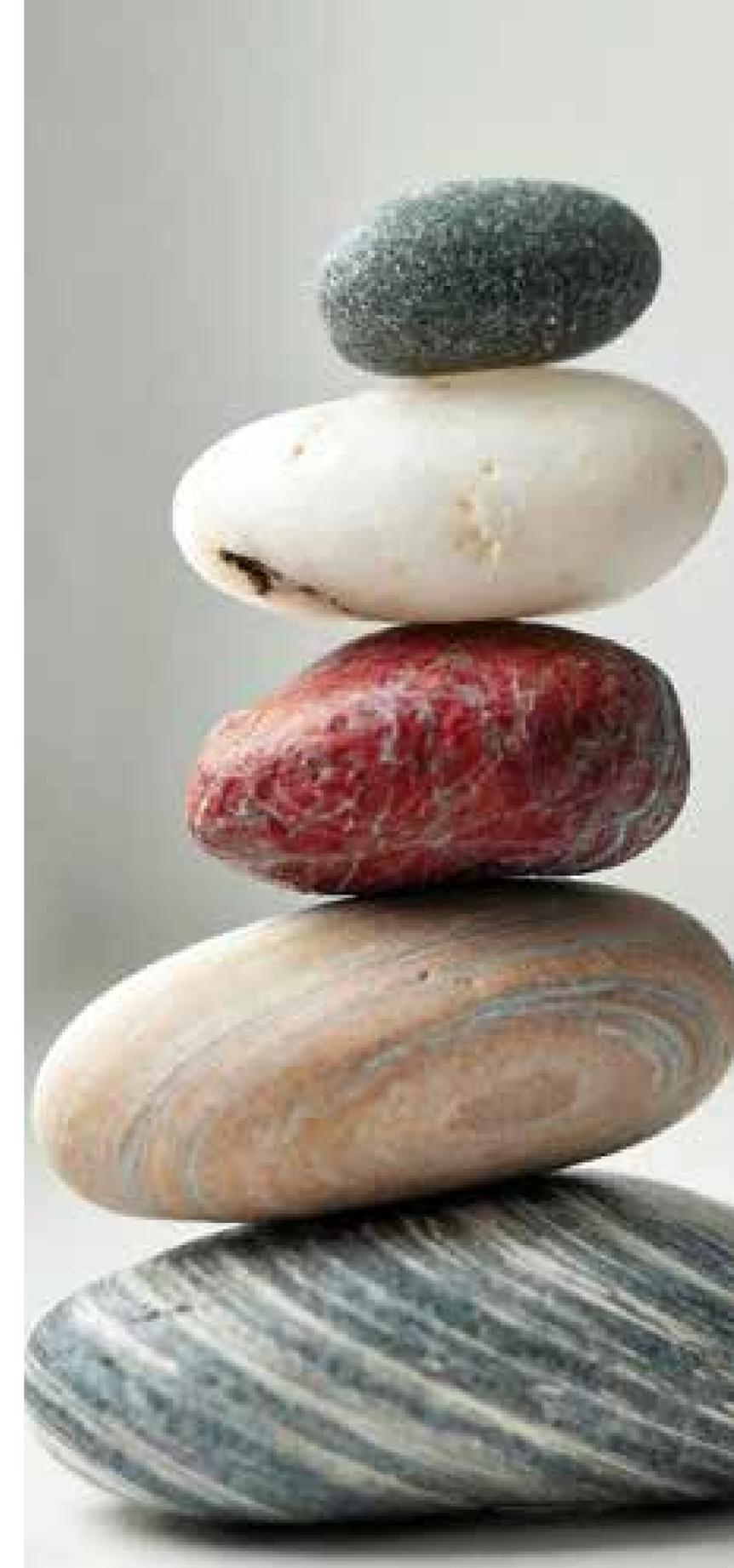
Refer to the Anti-Harassment and Non-Discrimination Core Policy for additional information.

Additional Leader Responsibilities

Leaders are responsible to ensure that discrimination or harassment does not occur within their work area. They are held to a higher standard and expected to report any instances of misconduct, including discrimination or harassment, that they become aware of 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

At Avista, we value the safety of our employees and the public who live and work near our facilities. Each of us plays a crucial role in fostering a safe work environment by staying vigilant, looking out for each other, and maintaining safe facilities for years to come.

Work must be performed safely and efficiently, adhering to established work practices, processes, and procedures. Approaching every task with a safety mindset demonstrates the type of safety leadership and accountability expected at Avista.

If you observe a situation that could pose a risk to yourself, your coworkers or the public, you are expected to take immediate action to ensure safety. Avista's Authorization to Stop Work empowers you to halt work without fear of reprimand or retaliation. You play a key role in learning from near misses to help prevent future incidents and address hazardous situations before they escalate.

Avista's Safety Management System (SMS) provides a structured and comprehensive framework for managing all aspects of safety. It includes the necessary organizational structures, accountabilities, policies and procedures to support a deliberate and proactive approach to safety.

Additionally, Avista's Incident Prevention Manual (IPM) outlines our safety commitment, expectations, safety rules and practices. Our Vehicle Use Policy further supports safety by defining employee responsibilities while driving on company business, helping to protect both employees and the public.

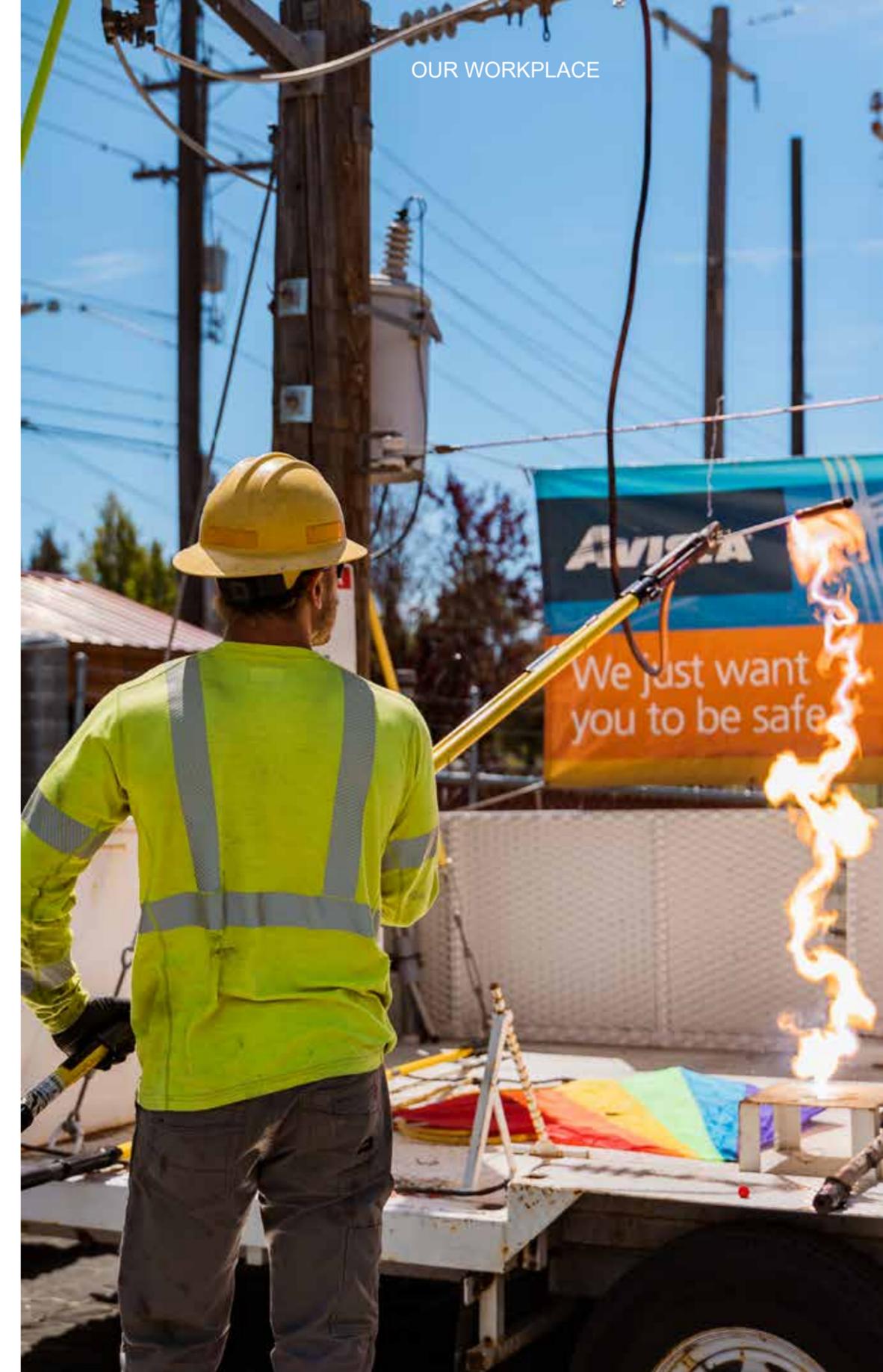
Any suspicious or unsafe conditions should be immediately reported to your leader, the Safety Department, Security or a Human Resources Manager.

Public Safety

Our communities depend on us to deliver safe and reliable energy services. To help ensure public safety, Avista has established safety-related policies and public-facing programs designed to prevent, detect, and respond to hazardous situations. When working in the field or interacting with the public, it is essential to speak up if you notice someone is unaware of a potential safety hazard. Help them understand the risks and dangers involved and, when appropriate, direct them to additional safety resources as needed.

Learn More:

[Incident Prevention Manual](#)
[Vehicle Use Policy](#)
[Public Safety Information](#)



Workplace Anti-Violence & Security

Maintaining a safe, secure, and productive work environment -- one that is free from threats, violence, or any form of inappropriate conduct is a top priority. Threatening behavior of any kind is strictly 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 to cause harm to another individual are strictly prohibited.

At Avista, our employees are the first line of defense. Stay alert to your surroundings, follow established security protocols, and report any threats or suspicious behavior immediately. Employees must always wear their badge with their photo clearly visible unless it presents a safety concern in which case the badge must be kept 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 ensure your safety.

If you observe an individual exhibiting inappropriate or unusual behavior or believe an individual has accessed an Avista workplace without authorization, it may be a sign of a potentially dangerous situation. In such cases, notify your leader, Security or Human Resources immediately.

Learn More:

[Workplace Anti-Violence Core Policy](#)



Fitness for Duty

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

To support a safe and productive workplace, employees are required to come to work fit for duty -- free from the effects of drugs or alcohol throughout their working hours. Employees who are not fit for duty pose a serious safety risk to themselves and others.

The Fitness for Duty - Alcohol & Controlled Substances Core Policy outlines the expectations necessary to maintain a positive, productive, and safe work environment. The possession, use, or distribution of alcohol or illegal drugs is strictly prohibited. All employees are expected to be familiar with and adhere to this Core Policy.

Support is available through the Employee Assistance Program (EAP) for employees, their dependents, or household members facing personal challenges such as substance abuse, family or marital issues, financial stress, emotional concerns or other life difficulties.

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 while on company property or during working hours 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 a wide range of activities, including but not limited to, sports betting, fantasy sports, raffles, lotteries, cards, dice games and online gaming or gambling websites.

Additional Leader Responsibilities -- Fitness for Duty

Avista's leaders are responsible for monitoring the attendance, performance and behavior of their employees. They are provided with training on reasonable suspicion and education about the dangers of drug use to help leaders recognize and respond when employee performance appears to be unsafe, ineffective, inappropriate or the behavior conflicts with the requirements of the Fitness for Duty -- Alcohol & Controlled Substances Core 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 individuals who are innovative and skilled, enabling us to continue delivering safe, responsible, and affordable service to our customers while advancing the company's mission.

We are committed to cultivating a positive and supportive workplace that promotes inclusion and belonging and which contributes to an environment of mutual respect. This commitment includes providing equal employment opportunities to all qualified individuals and ensuring fair employment practices 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 believes in the advancement and protection of human rights. We believe that everyone employed by Avista, as well as our 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 aligns 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

Avista's assets include everything the company owns or uses to conduct business. We must safeguard these assets and ensure they are used properly, safely, and efficiently. Company assets are to be used solely for appropriate business purposes.

Employees are expected to take great care in protecting company equipment, tools, supplies and materials from loss, damage, theft, misuse and waste. When assets are no longer useful, they must be disposed of according to established procedures. While there may be rare occasions where a leader authorizes the use of resources to support another Avista employee; under no circumstances should any employee direct Avista resources to complete work that supports them personally.

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



Technology Resources

We must remain vigilant to ensure that our technology is secure and to protect Avista and our business partners from illegal or harmful actions. Our cybersecurity practices are designed to protect our networks, software and data from unauthorized access, damage, and misuse. It is critical that you follow the guidance provided in our security awareness training and adhere to the expectations outlined in our Technology Resources Core Policy.

Avista's technology resources are intended for business use in support of your job duties. The use of these resources for unlawful, inappropriate, or unauthorized purpose -- or in any way that violates company policy, applicable laws, or could harm Avista's image or operations -- is strictly prohibited.

All forms of electronic communication created or transmitted using Avista's technology resources, whether business or personal, may be monitored, retained or reviewed internally, externally, or as part of legal proceedings. This includes emails, data, facsimiles, phone calls, social media posts, instant messages, and any other forms of communication.

This Policy also applies to personal devices used to access Avista's technology systems. You should not expect privacy or exemption from review. If you want to keep something private, Avista's technology resources should not be used.

Learn More:
[Technology Resources Core Policy](#)

Conflicts of Interest

We conduct business in a manner that ensures our business decisions are free from personal influence. Employees are expected to act in Avista's best interests and avoid situations that could create, or appear to create, a conflict of interest. This includes refraining from using Avista resources for personal activities and ensuring that such activities do not interfere with your work responsibilities.

Conflicts of interest can arise when a personal, financial or professional relationship interferes, or appears to interfere, with an employee's ability to perform their work objectively. In some cases, this may apply to the interests or activities of family members.

If you believe a personal interest, relationship, or association may create a conflict of interest, you are responsible for seeking guidance from your leader, Human Resources Manager, Ethics & Compliance Manager or the Legal Department. Formal disclosure may be required. Having a conflict of interest is not necessarily a violation, but failing to disclose it is.

Board Appointments & Advisory Roles

We encourage employees to actively participate in their communities. However, serving as a board member or advisor with Avista's competitors or business partners may create a conflict of interest. In such cases, approval from Avista's General Counsel may be required before accepting a 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 pursue business or investment opportunities they learn about through their work at Avista unless the company has first declined the opportunity and provided explicit approval.

Financial Investments & Arrangements

Investments in publicly-traded or privately-held businesses generally do not create a conflict of interest unless you or your relative have a significant ownership, beneficial or financial interest in a business that has a relationship, competes with or does business with Avista. If you have decision-making authority involving another company as part of your job or own more than ten percent of its 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

Participation in professional and community organizations is encouraged provided it does not interfere with your job performance or utilize Avista resources. If the organization has a relationship with Avista or if you are being paid or reimbursed for expenses where you are identified as an employee, approval from the General Counsel may be required.

Outside Employment

Employees may engage in work or provide services outside Avista provided it does not interfere with their Avista responsibilities. Such work must not occur during their scheduled work hours, on company premises, or utilize Avista's technology or resources. This includes self-employment or any positions as an owner, director, trustee, officer, employee, or consultant. If the outside organization has a relationship with Avista, prior approval by General Counsel may be necessary. Additionally, Avista does not engage directly with employee-owned businesses for company work. Any exceptions must be approved by General Counsel.

Personal Relationships

Relatives and others with close personal relationships to Avista employees may be employed by the company provided their employment does not create a conflict of interest or interfere with Avista's operations. Employees must disclose their relationships with coworkers, suppliers, competitors and business partners to their leader. A formal disclosure may be required.

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 expect them to uphold the same high standards of integrity that we do.

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 responsibility goals.

When working with suppliers and contractors, you may not:

- Offer anything of value in exchange for confidential information.
- Accept any illegally obtained information.
- Use illegally obtained information to the disadvantage of others.
- Publicly endorse products or services without approval from Supply Chain and the Legal Department.

If you are involved in contracting or buying decisions, you must be mindful of potential conflicts of interest and seek guidance from your leader, Human Resources Manager, Ethics & Compliance Manager or the Legal Department.



Antitrust & Competition

Avista conducts business in a way that promotes open and fair competition. We treat our business partners with respect and compete honestly and ethically in the marketplace.

This means acting with integrity in all interactions with our customers, suppliers, competitors, employees or others.

Unfair methods of competition or deceptive practices are strictly prohibited. This includes misrepresenting material facts, manipulating or concealing information, abusing privileged information or access, and engaging in any practice that could be considered misleading or unethical.

Any information that we obtain about our competitors, suppliers or others, including any former employees, must be gathered through ethical and legal means. Confidentiality of such information must always be respected.

Learn more:
Supply Chain Procedures

Gifts & Entertainment

We value strong, respectful relationships with our suppliers, contractors, customers, and business partners. To maintain the integrity of these relationships, we must remain impartial, objective, and free from outside influence that may create an actual or perceived conflict of interest.

Giving and receiving of gifts or entertainment should be rare and nominal in value. Such exchanges can create an actual or perceived sense of obligation. If you are offered or receive a gift, you should decline or return it when possible; otherwise, consider donating the item to charity or share it with your team. Cash or cash equivalents (gift cards, certificates, securities) are never permitted.

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 could reasonably be regarded as 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 any form of improper payment under any circumstance is never allowed.

A bribe can be anything of value such as cash, gifts, discounts, products, connections or personal favors that are offered, given, solicited or received with the intent to gain an advantage.

Employees are expected to conduct business ethically and in full compliance with anti-bribery and corruption laws, including those governing interactions with government officials and the Foreign Corrupt Practices Act (FCPA).

Avista 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](#)

[Bribery and Corruption Quick Reference](#)

[Gifts & Gift Card Policy](#)



Confidential Information

Protecting confidential information and respecting the privacy of our customers, employees, and business partners is essential to how we operate.

Confidential and proprietary information generated by Avista is a valuable company asset. It must be treated with care and must not be disclosed to any person or entity unless authorized by the company or legally mandated.

While some confidential information may be clearly marked as confidential or proprietary, all nonpublic information that has not been released to the public, whether labeled or not, must be protected.

This includes confidential information related to our business partners, suppliers, customers and employees.

You may not share confidential information and should avoid discussing confidential matters in public or unsecured settings where conversations may be overheard.

Confidential information acquired through your role at Avista may not be used for personal gain. Your obligation to protect this information continues even after your employment or working relationship with Avista ends.

If disclosure is required by law, Avista will verify the validity of the request and otherwise comply with the rule of law.

Employee Information

We respect every individual's right to privacy. 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.

Access to this information is limited to authorized personnel and may be used only for legitimate business purposes.

Customer Information

To serve our customers, we collect and store private information such as names, addresses, contact details, service type, personal identifiers and payment history. This information must be safeguarded and used solely for internal business purposes. Only authorized and trained personnel may access customer account information.

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



Intellectual Property

Innovation and information are key drivers of Avista's competitive advantage and business success. We protect the value of our ideas and information through 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 developments and ownership and to protect our intellectual property from unauthorized use or disclosure. 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 Avista's intellectual property. Additional expectations are outlined in the Confidentiality, Non-Solicitation and Invention Assignment Core Policy.

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 serve as evidence of our business activities, transactions, decisions, and operations. This includes all forms of information, data, and communications created or received by Avista.

You are expected to maintain the confidentiality and integrity of our records throughout their life cycle. You may not create records that intentionally mislead, omit, or delete important information or intentionally and unlawfully destroy, alter, or conceal evidential records.

Anyone who creates, receives, or maintains records of any kind is responsible for adhering to Avista's Records Retention Policy. This ensures that records are properly created, retained, and disposed of in accordance with applicable legal and regulatory requirements -- particularly those related to current or potential litigation.

Learn more:
Confidentiality, Non-Solicitation and Invention Assignment
Records Retention Policy



Accounting & Financial Records

We must maintain accurate and timely records of Avista's transactions 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, support our regulatory obligations, and guide our strategic business decisions.

You are expected to accurately record your time worked, expenses incurred, and funds received on behalf of the Company in a timely manner and 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 and legitimate business 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 time frame using the appropriate expense 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 mis-allocation of costs between the entities.

Learn more:

[Corporate Credit Card Policy](#)

[Gifts & Gift Card Policy](#)

[Regulatory Accounting Guidelines & Policies](#)

[Regulatory Accounting Procedures](#)

[Travel and Expense Reimbursement Policy](#)



OUR COMMUNITY & INVESTORS



Corporate Communications

The information we provide to the public, regulatory authorities and other external parties must be consistent, accurate and complete. Avista has designated individuals to act as official spokespersons and communication channels. Unless you are explicitly authorized, you may not make public statements on behalf of Avista. All media and external inquiries should be referred 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 includes any internal or external technology platform that enables individuals to interact and share information.

Avista's social media technology is designed to support business collaboration, information exchange, and online learning. When engaging in social media networking, your communications must be professional. Avoid posts that:

- are defamatory, threatening or intimidating
- may constitute harassment
- could contribute to a hostile work environment
- disclose another person's private information

How you communicate is just as important as what you communicate. Avista's Social Media Policy outlines expectations for both internal and external social media use, including discussing Avista publicly.

Social media may not be used in ways that violate Avista's policies or practices, break the law, are inappropriate, or could harm the company's image or business interests. Be especially cautious to avoid sharing confidential or nonpublic information about Avista and do not represent yourself as speaking on behalf of Avista unless you are authorized to do so.

Regulatory Communications

Regulatory interactions and communications are coordinated through the Regulatory Affairs Department to ensure consistency, continuity and timely response to meet the needs of our regulators. If you are required to communicate with a regulator, it is important that you work with Regulatory Affairs to provide information that is accurate and complete and to support the best possible outcomes for all stakeholders.

Legal & Regulatory Proceedings

When Avista is involved in legal or regulatory proceedings, employees are not permitted to discuss these matters with individuals who will be involved in the final decision making process. This includes administrative law judges, regulatory commissions and their advisory staff. These restrictions, known as ex parte rules, are designed to prevent any appearance of undue influence and to ensure all parties have equal access to information. If you have questions about these 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 trust of our investors and the public by adhering to financial laws and regulations. In the course of your work, you may have access to material nonpublic information about Avista, our customers, or business partners. That knowledge makes you an insider.

Information is material if a reasonable investor considers it important in deciding whether to buy, hold, or sell stock. Information is nonpublic if it has not been broadly disclosed to the investing public. Using this type of information to trade Avista stock, or the stock of any other company, is illegal and carries severe consequences.

Tipping is also a violation of insider trading laws. Tipping can occur if you provide someone with nonpublic 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 nonpublic information be shared with the investment community and the public at the same time. This ensures Avista's compliance with legal disclosure requirements. Only employees who are trained and authorized as part of their job responsibilities may communicate with the investment community.

Learn More:

[Insider Trading Policy](#)

[Insider Trading Quick Reference](#)

[Policy on Fair Disclosure](#)

Community Involvement

Avista is deeply invested in the communities we serve. Our dedication to social responsibility is reflected in our meaningful philanthropic support.

The Avista Foundation serves as our primary charitable vehicle to help strengthen the communities where we live, work, serve, and play.

Employees are encouraged to contribute their time, talents and treasure to support our communities, provided these activities do not interfere with their work responsibilities.

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

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

Political Activities

Avista actively participates in the democratic process and closely monitors political matters that may impact the company and the communities we serve. Employees are encouraged to participate in the political system and to vote according to their own views.

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

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

Avista will never apply pressure on anyone to make personal contributions or provide services for political activities.

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



QUESTIONS & RESOURCES

Avista's Code is not a complete guide to every legal, ethical, or policy issue that may arise; it serves as a guide for our commitment to integrity and ethical conduct. While Avista relies on each of us to exercise sound judgment in carrying out our duties, there may be times when we have questions about how the Code applies or whether a particular action aligns with its principles.

If you have questions, you should speak to your leader, a Human Resources Manager, Ethics & Compliance Manager or the 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
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
Social Media Policy
Supply Chain Procedures
Travel and Expense Reimbursement Policy
Vehicle Use Policy

