

Anti-Bribery and Anti-Corruption Policy

Applicability: All employees of Sempra & the Sempra Companies

Revision date: 2/28/2025

Policy

Sempra's core values include doing the right thing when conducting business. Sempra is committed to conducting its business in an open and forthright manner, in compliance with international, federal, state and local laws and regulations, maintaining high ethical business standards, and not using improper influence to obtain or retain business as set forth in our Code of Business Conduct. All employees of the Sempra Companies as well as anyone authorized to conduct business on behalf of the Sempra Companies shall comply with all applicable anti-bribery and anti-corruption laws, international laws, as well as this Policy and any procedures or guidelines that implement this Policy.

Sempra prohibits bribery to obtain new, or maintain existing, business or to obtain any improper business advantage.

Bribery (as broadly defined below) can include the direct or indirect giving, promising or offering to give, or authorizing the giving of anything of value, including, but not limited to, cash or cash equivalent, in-kind services, donations, contributions, loans and/or gifts to influence another party.

This policy applies to all employees of Sempra and the Sempra Companies. Good faith efforts shall be made to ensure that other affiliates adopt a policy or follow practices consistent with this policy. Sempra requires Third Party Representatives to act in a manner that is consistent with this policy.

In order to implement this policy, the Sempra Companies may issue from time-to-time various policies, procedures and guidelines related to particular corruption risk areas and business activities.

Books and Records

To prevent the concealment of any Bribes and comply with relevant laws this policy requires that all of Sempra Companies' financial transactions be recorded accurately and in reasonable detail in the company's books and records, and that adequate internal accounting controls be implemented to detect and prevent corruption and bribery.

Violations of Policy

A violation of this policy can result in severe civil and criminal penalties to Sempra Companies and their employees (including imprisonment), under the laws of more than one country. All countries prohibit Bribery of their own public and/or Foreign Government Officials, and many also prohibit the Bribery of officials of other countries. Furthermore, some prohibit commercial Bribery. Violation of this policy by an employee will result in discipline up to and

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including termination of employment.

Mandatory Reporting

Sempra takes any allegation of Bribery very seriously. All employees are required to report suspected violations of any anti-bribery and anti-corruption laws immediately to the Corporate Compliance Department designee, their Legal Department or to the Ethics Helpline. It is the responsibility of all employees to understand this policy. If any questions or concerns arise about the applicability or interpretations of this Policy, employees should contact the Corporate Compliance Department designee or the Legal Department for guidance

Required Training and Certifications

All employees who are directly or indirectly involved in activities that could involve contact with a Government Official, and/or who have access to or control of funds or accounts relating to such activities are required to complete anti-bribery and anti-corruption training and certifications, which are provided on a periodic basis. Additionally, appropriate employees who are directly or indirectly involved in activities that could involve awarding of supplier or customer contracts are also required to complete anti-bribery and anti-corruption training and certifications, which are provided on a periodic basis.

Note: All references to “Sempra Company/Company” in this document mean a subsidiary or other entity as to which Sempra has majority ownership and control.