



SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (“Code”) sets forth minimum standards for business conduct and ethics expected of any entity providing goods or services (“Supplier” or “the Supplier”) to one or more of the following entities: Southwest Gas Holdings, Inc., Southwest Gas Corporation, and Great Basin Gas Transmission Company, and Southwest Gas Transmission Company (collectively, “Company” or “the Company”). “Supplier” is intended to include the Supplier’s employees and any of its subcontractors, as applicable.

The Company expects its Suppliers to adhere to this Code. The Company may refuse to conduct business with Suppliers that fail to comply with the standards set forth in this Code.

Relationship to Contract Documents

The standards outlined in the Company’s Supplier Code of Conduct are intended to complement, but not supersede or replace, the terms and conditions of the agreements between the Company and its Suppliers. In the event of any conflict or apparent conflict between the requirements of the contract documents and this Code, the terms of the relevant agreement or contract documents will control. However, the Supplier should bring the inconsistency to the attention of the Company’s designated business representative.

Compliance with Laws and the Highest Ethical Standards

Supplier must comply with all applicable laws and regulations associated with the goods and services they are providing for the Company. In addition, the Company holds Supplier to the same high standards of integrity and ethical conduct to which it holds itself. Supplier interactions with Company personnel must reflect safe work practices, honesty, integrity and transparency. Supplier must provide written acknowledgement that this Code has been reviewed, prior to performing any work for the Company. Supplier must also ensure that all applicable employees and subcontractors that support and perform work for the Company understand and adhere to the standards described in this Code.

Health and Safety

The safety of the public and the Company’s employees, customers, and Suppliers is the highest priority. Supplier must comply with all applicable environmental and occupational health and safety laws and regulations, including, but not limited to, requirements concerning occupational safety, emergency preparedness, occupational injury and illness prevention, industrial hygiene, injury and illness recordkeeping and reporting, and physically demanding work. As applicable, Supplier must also complete any safety training and adhere to any safety requirements or protocols provided by the Company.

Human Rights and Labor

The Company opposes human trafficking, child labor, and forced labor practices anywhere in the world. The Company is committed to the fair treatment of workers and strict compliance with applicable standard labor practices under federal, state, and local laws, and encourages Supplier to do the same. As outlined in the United Nations Guiding Principles on Business and Human Rights, the Company recognizes its responsibility to respect human rights throughout the organization. These commitments are made with input and approval from stakeholders throughout the Company. Accordingly, Supplier is expected to adopt policies and practices consistent with this commitment, including but not limited to those that: 1) comply with all applicable wage and

benefit laws and regulations; 2) prohibit the knowing use or incorporation of materials products or services resulting from forced labor or any form of human trafficking; 3) prohibit the employment of any person under the minimum legal age for employment, as determined by applicable laws, regulations and authorities; and 4) prohibit the knowing incorporation of any materials, products or services resulting from the employment of any person under the minimum legal age for employment into any work product.

Diversity, Equity, and Inclusion

Company management shares a passion for diversity, equity and inclusion that guides how work and business is conducted throughout the organization. Similarly, Company suppliers should support diversity of thought; promote equal opportunity; and help create an inclusive and ethical culture. Supplier should adopt and enforce policies that prohibit its employees from engaging in verbal abuse, threats, harassment, public shaming, intimidation, and mental or physical coercion, both within its workplace and in its interactions with the Company, and which prohibit retaliation of any kind against persons who report suspected violations of such policies.

The Company is committed to maximizing opportunities for minority, women, veteran/service-disabled veterans, person with disabilities, and LGBTQ-owned business enterprises. The Company works with a diverse group of suppliers that demonstrate a shared commitment to the highest standards that help deliver the best service for its customers. Supplier is expected to support Company goals for diverse suppliers, including utilization of diverse prime and subcontractors, accurate reporting of diverse subcontracting, and development of diversity programs.

Diversity-certified businesses are viewed as valued Company partners in serving its customers, and that partnership will help diverse business enterprises develop and grow.

Environment

Company management strives to provide its customers with safe and environmentally responsible services by promoting, protecting, and preserving natural resources. Additionally, Company management is committed to compliance with applicable federal, state, and local environmental laws and regulations, and expects the same from its Suppliers.

Supplier is required to fully comply with all local, state, and federal laws concerning the environment in the conduct of its business with the Company, including by obtaining, maintaining, and keeping current all required permits and registrations and following applicable reporting requirements.

Conflicts of Interest

Supplier must exercise reasonable care and diligence to prevent any actions or conditions that could result in either an actual conflict with the Company's interests, or the appearance of such a conflict of interest, or that may compromise the exercise of independent judgment during the execution of Supplier's work for or on behalf of the Company, including, but not limited to:

- Personal Relationships – Supplier must disclose any personal relationships between members of its workforce and Company employees. Company employees with personal financial interest in any supplier shall not influence or participate in any business decisions regarding that supplier.
- Gifts and Entertainment – Gifts and activities of reasonable value given to Company employees may be acceptable if there is a business benefit. Items that are generally acceptable include but are not limited to: tickets to charity events, tickets to entertainment/sporting events, gifts of cash or cash equivalents not exceeding \$25, holiday gatherings, meals, and others.



Southwest Gas
HOLDINGS

Bribery and Corruption

Company management is committed to conducting business fairly and ethically, and will not tolerate bribery, corruption, extortion, or embezzlement. The Company does not offer or accept bribes, kickbacks, facilitation payments, or similar inducements.

Supplier should take reasonable steps to ensure its personnel do not offer or accept any bribe or kickback to and from any Company customer, supplier, or employee. Supplier must report to the Company any suspected attempts at bribery or other such inducements on the part of Company employees. Supplier must not violate the Foreign Corrupt Practices Act and must comply with anti-corruption laws that govern its operations. Further, Company policies prohibit Supplier from making payments or promises to pay anything of value to influence, induce, or secure an improper advantage in obtaining or retaining business. Anything of value includes, but is not limited to:

- Cash or Cash equivalents
- Drinks or meals
- Entertainment
- Gifts
- Lodging
- Promise of future employment

The Company expects Supplier to meet these standards, understanding that the actions of Supplier – good or bad – reflect on the Company.

Fair Competition

Supplier is expected to help safeguard and maintain the integrity of the Company's contract negotiation process. Supplier must compete fairly and not misrepresent its products or services. Supplier must not enter into agreements with its competitors to restrain trade. Until a contract is awarded, Supplier shall refrain from initiating or participating in private discussions about a bid or proposed contract with any Company employee not authorized to speak on the Company's behalf. This does not apply to a Supplier's disclosure and notification of potential conflicts of interest or reporting suspected violations or other concerns to the Company consistent with this Code.

News Media and Social Media

Supplier may not make any public statements on behalf of the Company or that appear to be on behalf of the Company. Additionally, Supplier may not use any Company logo without prior written authorization from the Company. Any Supplier wishing to use any Company logo must submit a written request for review that includes examples of how the logo is intended to be used.

Maintaining Accurate Records

Business and financial records are essential to the Company's operations. Supplier is expected to provide clear, complete, and accurate reporting and any necessary supporting documentation pertaining to business transactions, and to ensure that information is maintained in a manner consistent with applicable laws and regulations and that adequate internal controls are in place to protect and comply with these requirements.

Protecting Company Resources

Supplier must protect Company resources, including physical property, equipment and tools, intellectual property, confidential information, and any information covered by privacy laws. Supplier must use Company resources and information only for legitimate Company business purposes allowed under the contract.



Southwest Gas
HOLDINGS

Supplier shall maintain and protect the confidentiality, integrity, and availability of confidential information entrusted to Supplier by the Company, except when disclosure is legally mandated or authorized by the Company. In the event of an unauthorized use or disclosure of the Company's confidential information, Supplier must promptly notify the Company in accordance with the terms and conditions of the contract documents.

When granted access to Company premises, facilities, software or equipment, Supplier's employees must follow all policies and procedures governing their access. Any items or information provided to Supplier, or its workforce, to access the Company's premise, facilities, software or equipment may not be duplicated and may not be transferred without the Company's consent. When access is no longer required or upon the Company's request, Supplier must immediately return all such access items.

Reporting Concerns

Supplier can securely and confidentially report unethical behavior and suspected violations of the Code through the Company's Ethics and Compliance Hotline, which is operated by an independent third-party. Reports can be made anonymously. The Hotline may be accessed by phone at 1-866-230-3579 or online at <https://swgas.alertline.com>.

The Company will make a reasonable effort to keep identities and the circumstances regarding reports confidential during and after the investigation, including limiting disclosure of that information to those persons on a strictly need-to-know basis.

Non-retaliation & Privacy

The Company prohibits retaliation in any form against a person who, in good faith, reports a compliance or ethical concern. Supplier is expected to protect an individual's right to report suspected misconduct or noncompliance with regulations or other ethical issues.