



ALVAH CONTRACTORS, INC. SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct sets forth Alvah Contractors, Inc. expectations for our Suppliers, their employees and others they conduct business with, to follow and conform to while supplying goods and services to Alvah Contractors. This is a supplement to Pacific Gas and Electric Company's Supplier Code of Conduct, of which, Alvah Contractors expects all Supplier to adhere to while conducting business on behalf of Alvah Contractors and PG&E.

Compliance with Laws, Rules and Regulations

Suppliers shall obey all local, state and federal laws when conducting business on behalf of Alvah Contractors, Inc and PG&E. Suppliers shall inform Alvah Contractors of any recent, pending or current criminal investigations, charges or civil litigation against it or any of its employees so Alvah can assess the potential impacts of such actions.

Ethical Business Conduct & Integrity

No supplier shall engage in any form of corruption including extortion, fraud or bribery. No Supplier should engage in any activities that shall create a conflict of interest and all Suppliers shall handle their business with a clear conscience.

Alvah feels that Business Integrity is of the utmost importance and we look for sub-contractors who are like minded. Our sub-contractors are a reflection of Alvah and we do not tolerate any action that would compromise our integrity or that of our customers. Any sub-contractor employee action that puts our company and its relationship with our customers, vendors or the public in jeopardy is strictly prohibited.

Company Records and Disclosures

We value our relationship with sub-contractors and it is our expectation that they would never even consider falsifying records. Accurate records and disclosures are critical to Alvah meeting its legal, financial, regulatory and management obligations. Suppliers shall ensure that facts are never misstated, or material information omitted to Alvah, and that all records, disclosures and communications to Alvah are full, fair, accurate, timely and understandable. The true nature of any transaction shall never be hidden, altered, falsified or disguised, nor any endorsements, approvals, or authorizing signatures for any payment forged. Records or disclosures known to be false or misleading shall not be submitted, entered, processed or approved and shall be reported to suppliers Alvah business contact.

Health & Safety

Suppliers shall comply with all applicable California Occupational Safety and Health Administration rules and regulations and any other rules and laws per the governing jurisdiction. It is our expectation that all Suppliers have their own Safety Program including: Responsible oversight, Injury, Illness and Prevention Program, auditing, daily tailboards, job hazard analysis, injury, incident and near miss reporting to Alvah, training, inspection and safe operating procedures.



Drugs & Alcohol

Suppliers shall have a zero-tolerance policy towards drugs & alcohol, including the purchase, transportation and consumption of any illegal drugs & alcohol including prescription drugs/ and/or over the counter medication that may impact the ability for an employee to safely perform his duties. The field employees must be part of substance abuse testing program that provides for pre-employment, random, post-incident and for cause testing at or above federal testing levels.

Supplier Diversity

Alvah Contractors, Inc. is a Minority Owned Business, thus understands the importance of promoting and supporting MBE's. Alvah encourages the use of certified MBE's in the supply chain whenever possible.

Privacy and Sensitive Information

Alvah retains the right to monitor our sub-contractors work environment to determine compliance with applicable federal, state and local law as well as our customers work procedures. Just as we feel it is imperative to keep our own information private, we recognize our customers and vendors information is just as private and we do not share it unless required for the work performed.

Confidential Information and Intellectual Property

Disclosure of confidential business information by Alvah sub-contractors regarding research and development, marketing, advertising or sales strategies, customers, pricing, processes, company plans, or any other confidential information regarding Alvah or its customers company operations is prohibited and will not be tolerated. The confidential information we are in possession of would relate to drawings and designs for underground electrical system rebuilds or additions. Often these documents are shared by PG&E with government municipalities in part of their process of obtaining permits. The documents are not marked as confidential, but we recognize that they are PG&E property and are only to be used on a need to know basis.

Insider Trading

We believe it is unethical for our suppliers to be engaging in any way with insider trading. This practice is strictly prohibited.

Endorsements: It is improper to imply that Alvah or its customers endorse any of its suppliers without their expressed permission to do so.

Improper influence

Bribes, or other means of obtaining undue or improper advantage are not to be offered or accepted. Behaviors or actions that may negatively influence, or appear to influence, supply management decisions shall be avoided, as are any improper reciprocal agreements. Alvah as a company maintains fair hiring practices and does not allow employees to receive gifts or any other incentives meant to influence a business relationship or to gain influence for services. In an effort to catch any inappropriate behavior all Alvah managers expense reports are reviewed and approved by the President of Alvah Contractors.



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Responsible Procurement

Suppliers shall take reasonable steps to ensure that products and services procured are from ethical sources and that sub-suppliers are aware of and comply with the principles of conduct listed in this document.