



# ALVAH GROUP

Programs | Projects | People

## SUPPLIER CODE OF CONDUCT

**ALVAH GROUP**

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Alvah Group provides quality utility infrastructure solutions by partnering with our customers to build long-term relationships based on safety, service, quality, and value. To help fulfill this mission, we take a grassroots approach to ensure engagement and support across all levels of our organization.

Alvah Group is committed to treating all workers with respect and dignity, guaranteeing safe working conditions, and ethical operations. We expect our Suppliers, subcontractors, customers, and employees to embrace Alvah Group's Supplier Code of Conduct.

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## A Message from Our President

**To all contractors, consultants, suppliers, and vendors:**

At Alvah Group, we understand that a strong commitment to compliance is necessary for success. We strive to ensure that every business decision is guided by our Mission, Vision, and Culture and our commitment to operate with high ethical standards.

We are committed to ethical business conduct and compliance with applicable laws, regulations, and policies, and we expect our contractors, employees, Suppliers, and vendors (collectively, "Suppliers") to share this commitment. This includes promoting and ensuring our safety culture and reporting.

This Code of Conduct sets forth the principles and standards of conduct that Suppliers, their employees, subcontractors, and sub-suppliers must adhere to as they provide goods and services to Alvah Group.

Suppliers are responsible for ensuring:

1. This Code is shared with all individuals assigned to perform work for Alvah Group.
2. Any work performed for Alvah Group is done in full compliance with this Code, all applicable laws, and regulations, and in accordance with the highest standards of ethical business conduct.
3. Any work performed for Alvah Group is done by trained individuals with the skills, expertise, and certifications necessary to complete the job in a safe and compliant manner.

Suppliers are to discuss any questions or concerns about compliance or ethics issues that arise while working for Alvah Group with their business contact or through the Compliance and Ethics Helpline. Suppliers may also contact me directly with questions on compliance or ethics issues, to report activities that they believe may be illegal or unethical or to raise concerns about questionable accounting or auditing matters.

We appreciate your commitment to making compliance and ethics a top priority.

Sincerely,



Cameron Hale, President



## Health & Safety

The safety of the public, employees and Suppliers is Alvah Contractor's highest priority. Working safely and in compliance with all applicable safety rules, laws, standards, and procedures, including the California Occupational Safety and Health Administration (Cal/OSHA) rules and regulations (or local equivalent, if outside of California), with this Code of Conduct, is a condition of engagement as a supplier to Alvah Group.

Basic safety and health expectations and requirements are set forth below.

- **Public Safety:** Supplier shall identify and eliminate all potential public safety hazards associated with any activity, service or product or equipment/tool deployed in the execution of a service for or on behalf of Alvah Group. Where hazards cannot be eliminated, they shall be controlled to within acceptable regulatory limits and recognized industry best practices. Appropriate public engagement, communication and access control shall be undertaken to ensure no hazard exposure nor harm to the public.
- **Occupational Safety:** Supplier shall identify workforce exposure to safety hazards via risk assessments and job safety analysis. Hazards shall be eliminated or controlled through proper design, engineering, procedural controls, and ongoing safety training. Where hazards cannot be adequately controlled by these means, the workforce shall be provided with appropriate, well-maintained personal protective equipment (PPE). As critical partners in achieving zero workplace injuries, Alvah Group's subcontractors and Suppliers are encouraged to report near hits and are empowered and expected to stop the job if they observe work being performed in an unsafe manner by either an Alvah Contractor's employee, or third party conducting Alvah Group-related work.
- **Vehicle Safety:** Supplier shall ensure that all vehicles used and transportation activities in performing any work for Alvah Group is in compliant with applicable Department of Transportation (DOT) and Department of Motor Vehicles (DMV) regulations and codes. When operating a vehicle for Alvah Group business, drivers shall carry a valid driver's license, comply with the state vehicle code, and operate their vehicle safely at all times, including minimizing all distractions while driving and obeying all posted road regulations.
- **Industrial Hygiene:** Occupational hygiene and medical surveillance methods shall be implemented by supplier for all applicable work activities to identify, eliminate and/or control workforce exposure to chemical, biological and physical agents and to provide ongoing monitoring and surveillance of affected personnel. Engineering or administrative controls shall be used to control overexposures. When hazards cannot be adequately controlled by such means, the health of the workforce shall be protected by appropriate personal protective equipment (PPE) and programs.
- **Emergency Preparedness:** Suppliers shall identify potential emergency situations and events associated with the work or location of the work to be carried out for or on behalf of Alvah Group and minimize potential impacts by implementing the following emergency plans and response procedures where applicable: Response equipment and PPE, emergency response reporting, workforce/public notification and evacuation procedures,

emergency response training and drills, appropriate fire/emergency detection and suppression equipment, adequate exit or escape paths and recovery plans.

- **Fitness for Duty:** Suppliers shall have a process in place for determining if members of their workforce are safely able to perform the essential physical, psychological, and cognitive requirements of their job without risk to self, others, or the environment, and to ensure that they are not impaired by drugs, alcohol, disabling medical conditions or fatigue. Suppliers must also comply with any other fitness-for-duty regulations that apply to the work being carried out for or on behalf of Alvah Group, such as, but not limited to, those required by Cal/OSHA, or the Department of Transportation.
- **Use of Drugs and Alcohol:** The use, possession, purchase, sale, or the offer to sell, transfer, provide or share illegal drugs, or recreational and medical marijuana, during the execution of work for or on behalf of Alvah Group, is prohibited, as is being in possession of, or under the influence of, medication prescribed for someone other than the prescribed patient. Suppliers are to inform Alvah Group if they suspect that any member of their workforce is taking prescription drugs, or over-the-counter medications, which could reasonably affect the ability to work safely or efficiently.

Work must never be performed while under the influence of alcohol. Alcohol may not be consumed on Alvah Group property or while working on behalf of Alvah Group, including at meal times. Noncompliance with this requirement will result in the offending worker's termination from a project and may result in termination of a supplier's assignment with Alvah Group. Alvah Group-owned, leased or rented vehicles may not be operated after consuming alcohol. Alcohol may not be transported in an Alvah Group-owned, leased or rented vehicle.

In addition, to the extent it may be applicable to their contract terms, supplier shall comply with the U.S. Department of Transportation's (DOT) regulations for (i) commercial motor vehicle drivers, 49 CFR 382, Controlled Substances, and Alcohol Use and Testing, and (ii) for work on gas, hazardous liquid and carbon dioxide pipelines, and liquefied natural gas pipelines, 49 CFR Parts 192, 193 or 195, Control of Drug Use in Natural Gas, Liquefied Natural Gas and Hazardous Pipeline Operations. Supplier shall establish and maintain a drug and alcohol testing program for its employees consistent with 49 CFR Part 40, Procedures for Transportation Workplace Drug Testing Programs and 49 CFR 199, Drug and Alcohol Testing, as applicable. Suppliers shall ensure that any subcontractor hired by the supplier to perform any portion of the work under their contract that is regulated by 49 CFR 192, 193, 195 or 382 shall also have a drug and alcohol testing program that complies with applicable DOT requirements.

- **Weapons in the Workplace:** Weapons shall not be brought onto, carried, stored or used on Alvah Group-owned, leased or rented property, or in an Alvah Group-owned, leased or rented vehicle, in a personal vehicle while on Alvah Group job site, whether performing work for Alvah Group or not. A "weapon" is a firearm, ammunition, explosive, or any other device or object that could be construed as a weapon. Weapons do not include tools that are used for legitimate business purposes.
- **Sanitation, Food and Housing:** Where applicable, members of supplier's workforce shall be provided at a minimum, with ready access to clean toilet facilities, potable water, and to sanitary food preparation, storage and eating facilities. Where dormitories are provided

by the supplier or a labor agent, these shall be maintained to be clean and safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

## Environmental Leadership

Alvah Group is committed to environmental leadership and sustainability. We believe that businesses have a responsibility to protect the environment and to promote sustainable practices. We are committed to reducing our environmental impact and to working with our suppliers to do the same.

We expect our suppliers to:

- Comply with all applicable environmental laws and regulations.
- Reduce their environmental impact.
- Use sustainable materials and processes in their operations.
- Report on their environmental performance on an annual basis.

Reduction of environmental impact may be achieved through the following measures:

- **Reduced energy use:** Set target goals for reducing energy use by a certain percentage each year by investing in energy-efficient equipment and lighting and implement energy-saving measures such as turning off lights when not in use.
- **Waste reduction:** Set target goals for reducing waste production by a certain percentage each year by recycling and composting waste materials, and work to eliminate single-use plastics from operations.
- **Water conservation:** Set target goals for reducing water use by a certain percentage each year by installing water-efficient fixtures and implement water-saving measures such as fixing leaks.
- **Sustainable materials:** Commit to using sustainable materials where possible by purchasing and using recycled materials, and source materials from renewable sources.
- **Climate action:** Set target goals for reducing greenhouse gas emissions by investing in renewable energy, and work to improve the energy efficiency of operations.

We believe that by working together, we can make a positive impact on the environment and create a more sustainable future.



## Supplier Diversity

Diversity and inclusion are an integral part of Alvah Group's values and principles. It strengthens our relationships with our customers, employees, and vendors. We look to all Suppliers to help us achieve our supplier diversity goals as part of this winning formula.

Alvah Group is committed to providing maximum practical business opportunities to small, women, minority, service-disabled veteran, and LGBT-owned business enterprises (diverse business enterprises or DBE). We expect our Suppliers to strive for the same, including, but not limited to mentoring DBE subcontractors or business solution partners, sharing expertise, systems and tools with DBE subcontractors or business solution partners, seeking to integrate DBEs in different ways throughout their supply chain and seeking maximum DBE participation.

In general, to be certified as a Diverse Business Enterprise (DBE), a business must be at least 51% owned, controlled, and operations by member(s) from one of the following groups and be a U.S. citizen:

- Minority Business Enterprise (MBE): African American, Hispanic, Native American, or Asian descent
- Lesbian, Gay, Bisexual or Transgender (LGBT): Businesses that have been certified by the National Gay and Lesbian Chamber of Commerce (NGLCC)
- Women Business Enterprises (WBE): Women owned business that have been certified by the Women Business Enterprise National Council (WBENC), or agencies such as the CA Public Utilities Commission (CPUC) Supplier Clearinghouse
- Disabled Veteran Business Enterprise (DVBE): Businesses which have been certified by the CA State Department of General Services as a U.S. military veteran owned firm with service-connected disability or similar agency
- Small and (8a) Business Enterprises: Companies meeting U.S. Small Business Administration's criteria for small and/or 8(a) disadvantage firms

## Labor Policies

Alvah Group expects its Suppliers to know and uphold the human rights of all workers, whether temporary or contract employees, and to treat all their workforce members with dignity and respect, providing them with safe and humane working conditions. Expectations include the following:

- **Freely Chosen Employment:** Suppliers shall not use or participate in the exploitation of workers, forced or involuntary labor, including human trafficking. All members of the workforce shall be free to leave the workplace or to terminate their employment at any time. No workforce member shall be required to surrender any government-issued identification, passports or work permits as a condition of employment.
- **Wages and Benefits:** Wage payments and benefits must comply with all applicable laws and regulations. Suppliers shall inform their workforce members of the basis on which they are paid via pay stubs or similar documentation and in a timely manner. Deductions from wages as a disciplinary measure shall not be permitted.
- **Working Hours:** Suppliers shall not require their workforce to work beyond daily and weekly work hour limits as defined and required by local, state/provincial, and federal/national law.
- **Harassment and Discrimination:** Suppliers shall not tolerate any form of harassment or discrimination. This includes behavior, comments, jokes, slurs, email messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment such as bullying, initiation activities, or workplace hazing regardless of the other person's willingness to participate. Suppliers are to comply with applicable local, state/provincial and federal/national legal requirements prohibiting conduct that could reasonably be construed as sexual in nature, or discrimination or harassment based on race, color, age, gender or gender identity, sex (which includes but is not limited to pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), sexual orientation, gender expression, transgender status, ethnicity, genetic information, physical or mental disability, pregnancy, religion, religious creed, political affiliation, medical condition, military and veteran status, protected veteran status ancestry, citizenship status, utilization of leaves of absence protected under state or federal law, union membership or marital status. These, or any other non-job-related factor, shall not be used as grounds for discrimination in hiring and employment practices, including advancement, disciplinary decisions, benefits, training, or general workplace conduct.
- **Workplace Violence:** Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, or similar activities shall not be tolerated by Suppliers. Engaging in acts or threats of violence will result in termination of the offending worker and may result in termination of supplier's assignment with Alvah Group.
- **Humane Treatment:** Suppliers shall ensure that all members of the workforce are treated with respect and that no use is made of corporal punishment, threats of violence

or other forms of physical coercion or harassment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

- **Freedom of Association:** The rights of the workforce to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws shall be respected and upheld by Suppliers.
- **Non-Reprisal:** Suppliers shall ensure that their workforce is able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment.

## Human Trafficking & Child Labor

This section of the Supplier Code of Conduct sets forth the minimum standards that our Suppliers must meet to do business with us. We are committed to providing a safe work environment for all employees and we expect our Suppliers to do the same.

### Prohibition of Human Trafficking and Child Labor

Alvah Group prohibits the use of forced labor, involuntary labor, human trafficking, and child labor in our supply chain. This means that our Suppliers must not use any form of coercion or violence to compel employees to work.

Our suppliers must agree to the following requirements:

- They will not engage in or tolerate any form of human trafficking or child labor.
- They shall not employ any person under the minimum legal age for employment as prescribed by the relevant local authority, or under the age for completing compulsory education, whichever is greatest.
- They will ensure that all employees are paid fair wages and benefits, and that they work in safe and healthy conditions.
- They will comply with all applicable labor laws and regulations.
- They will cooperate with us in any audits or investigations that we may conduct to ensure compliance with this Code.

Suppliers' Legitimate workplace apprenticeship programs, which comply with all laws and regulations, are supported. Workforce members under the age of 18 shall not perform work that may expose them to hazards.

### Non-Compliance and Reporting

If we find that a supplier is not in compliance with this Code, we may take a variety of actions, including terminating our business relationship with the supplier.

If you have any concerns about human trafficking or child labor in our supply chain, please report them to us immediately. See "**Raising Concerns**" section for additional information.

# Ethical Business Conduct

Alvah Group expects Suppliers to conduct business in accordance with the highest ethical standards, including adherence to the following:

- **Business Integrity:** Suppliers shall prohibit all forms of bribery, corruption, extortion, embezzlement, and money laundering. 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.
- **Criminal and Civil Claims:** Suppliers shall inform Alvah Group of any recent, current, or pending criminal investigations or charges as well as any recent, current, or pending civil litigation against it or any of its employees.
- **Privacy and Sensitive Information:** Alvah Group retains the right to monitor its assets and work environment to determine compliance with applicable federal, state and local law. Suppliers shall not expect privacy during use of an Alvah Group workspace, computers, voicemails, or systems that create, access, transmit or store information. Such information is accessible to Alvah Group even if it is password-protected, deleted by the user or in a locked area.
- **Confidential Information and Intellectual Property:** Confidential and protected information includes legal documents, contracts, proposals, information about a specific employee or customer (including name, address, Social Security number, phone numbers, contact names and billing data), intellectual property and trade secrets (e.g., competitive strategy, trading, investment, costs, supplier name/contract/pricing information, finance methods).

Revealing confidential or protected information obtained while working for Alvah Group is a violation of this Code of Conduct, and potentially the law. Suppliers shall immediately report any suspected data breach.

### Report Suspected or Confirmed Data Breach

Immediately report a suspected or confirmed data breach to Alvah Group by emailing:  
[CyberSecurity@alvahgroup.com](mailto:CyberSecurity@alvahgroup.com)

Other related requirements include ensuring the following:

- Confidential or protected information is not shared with Alvah Group affiliates that produce energy or energy-related products and services, used for personal gain or advantage, or copied or shared without appropriate approval. This obligation continues even after an assignment at Alvah Group ends.
- Alvah Group internal, confidential, or restricted information is not stored on a device that is not owned by Alvah Group

## Conflicts of Interest

Suppliers with conflicts of interest may receive assignments from Alvah Group, however, Suppliers shall avoid conflicts and notify Alvah Group of any existing conflicts or as they arise.

Conflicts may include, but are not limited to: doing business or work for a competitor, making decisions to boost a business you have stake in, taking advantage of confidential information learned through working with Alvah Group, or cashing in on business opportunities Alvah Group may have pursued.

Even though conflicts of interest can occur in any workplace, there are often other considerations Suppliers can make to prevent them from engaging in a conflict. Consider these examples so you are aware of what Alvah Group may consider a conflict in the workplace:

- An executive at the company who holds several shares of company stock sells their holdings after becoming aware that the business will take certain actions that can lower the price of stock in the near future.
- A manager hires their nephew in a supervisory role even though their family member does not have any experience and other candidates are better suited for the position.
- An employee accepts a vacation package as a gift from a vendor, then purchases more than what the business needs from the vendor as a thank you.
- A human resources professional choosing not to investigate a claim of inappropriate behavior because the person the complaint is against is a personal friend of theirs.
- An employee who is working for one company while talking to a vendor about coming to work for their company at a future date.
- A manager who enters into a romantic relationship with a direct report. This can be a conflict of interest because the manager is assumed to have a bias toward their significant other and may even share insider knowledge with them that they should keep confidential.
- An employee has a second job at an organization or a side business that develops a product or offers a service that is in direct competition with their other employer.
- An executive chooses a vendor to have a business relationship with the company, yet they own stock in the vendor's business. Although the introduction of the vendor and their services can be beneficial to the organization, the executive has a special interest in the relationship.

## Engagement With External Parties

- **News Media:** No supplier shall represent itself to the media as speaking on behalf of Alvah Group unless expressly authorized to do so by Alvah Contractor's Leadership team. In the case of an emergency, reporters arriving on the scene may try to gather information from any available source. If forced by the situation to respond to reporters, no attempt should be made to improvise an answer, to speculate or to downplay the seriousness of the situation. All reporter inquiries must be directed to Alvah Group Leadership team.
- **Communication Restrictions for Current/Former Government Employees:** Suppliers shall ensure that it understands and enforces post-government employment ethics requirements applicable to employees or contractors that were previously, or are concurrently, government employees or contractors. These requirements place restrictions on interactions and communications executed on behalf of Alvah Group or Supplier with government entities. Restrictions and requirements also apply to consultations on matters on which the current or former government employee is working or previously worked while in government.
- **Social Media:** Suppliers shall have processes in place to ensure that the use of social media by their workforce or representing agents does not negatively affect Alvah Group reputation. Processes should specifically ensure against the following:
  - Representation of any content in any social media regarding Alvah Group without prior written approval of Alvah Group Leadership team.
  - Posting content about Alvah Group staff or personnel, shareholders, customers, vendors, affiliates, or competitors that is derogatory or in contravention of any standards in this Code of Conduct.
  - Making business commitments involving Alvah Group.
  - Posting photographs or video of non-public areas of Alvah Group projects, premises, processes, operations, or products without prior written Alvah Group approval.
  - Use of Alvah Group logo, trademark or proprietary graphics in a way that suggests representation of Alvah Group.
- **Customers:** Alvah Group is committed to ensuring that all its customers have a positive experience when working with company employees and Suppliers. While working for or on behalf of Alvah Group, supplier must ensure that:
  - Clothing worn by workforce members is professional and appropriate to the type of work being performed.
  - All workforce members conduct themselves in a professional manner.

- Customers and property owners are provided with accurate information.
- Photo Badges are to be carried at all times, with a willingness to show it to customers.

If unsure about the appropriate attire for the worksite or about the type of information to provide to a customer, supplier should discuss the matter with their Alvah Group contact.

## General Management & Administration

- **Employment Eligibility:** Suppliers should have a process in place to confirm the employment eligibility of its employees. Suppliers also agrees to support any requests by Alvah Group to have background checks or employment eligibility of any of its employees conducting work for or on behalf of Alvah Group checked by a reputable third party.
- **Alvah Group Assets:** Assets such as computers, telephones and cell phones, fax machines, copy machines, conference rooms, vehicles, construction equipment, tools and similar assets are for Alvah Group use only, unless explicit permission to use them has been secured in advance from the appropriate Alvah Contractor's contact.
- **Computer and System Security:** Suppliers who have access to Alvah Group information systems are responsible for ensuring the security of those systems by identifying and complying with Alvah Group information and cyber security policies and standards. Requirements include ensuring the following:
  - Computer accounts, passwords and other types of authorization are assigned to individual authorized users and must not be shared with or divulged to others. Authorized users will be held accountable for all actions taken on their system with their user identification.
  - Internet access is not used to conduct personal business, play computer games, gamble, conduct political campaigns or for personal gain.
  - Sexually suggestive or explicit material, gaming, file sharing or other inappropriate files or websites are not downloaded or accessed
  - Inappropriate or pirated content is not stored on Alvah Group equipment.
  - Only approved, authorized, and properly licensed software is used on computer systems.
  - No attempts are made to circumvent or attack security controls on a computer system or network.
  - Alvah Group-issued equipment shall be protected from unauthorized access and theft at all times, including locking the computer screen when the computer or laptop is left unattended.

Violations of the above may result in termination of supplier's assignment with Alvah Group.

**Report Lost or Stolen Devices**

Immediately report lost or stolen devices to Alvah Group by emailing:

[CyberSecurity@alvahgroup.com](mailto:CyberSecurity@alvahgroup.com)



- **Business Continuity:** Alvah Group expects its Suppliers to have business continuity plans in place, to test those plans and to exercise those plans for their business to operate on a continual basis with minimal interruption of supply in the event of an emergency, crisis situation, natural disaster, or terrorist/security related event.
- **Management Systems:** Suppliers shall support compliance with this Code of Conduct by establishing pertinent policies and processes appropriate for the nature and scale of operations, including the following: Management commitment; accountability and responsibility; identification of legal and customer requirements; risk/issues assessment; risk/issues mitigation (procedural and physical controls); change management; emergency preparedness; training and competency; communications; monitoring, measuring and reporting performance; audits and assessments; incident reporting, investigation and corrective action process; target setting and continual improvement process. Failure to comply with the expectations outlined could result in termination of your assignment and/or contract.

## Raising Concerns

The standards of conduct described in this Supplier Code of Conduct are critical to the ongoing success of Alvah Group's relationship with its Suppliers. If Suppliers encounter questionable activities, we encourage you to immediately bring them to the attention of Alvah Group.

There are different ways to report a violation or discuss a concern:

- You may call the anonymous Compliance and Ethics Helpline.
- You may file a report via the Anonymous Compliance and Ethics Online Reporting Form
- You may call your business contact, an Alvah Group officer, or email the Compliance and Ethics mailbox, however, these are not anonymous reporting methods.

These options are available 24 hours a day, 7 days a week, and are a safe place to ask compliance and ethics questions or to raise concerns without fear of retaliation. Reports are handled confidentially to the extent permitted by law and there are options to submit anonymously.

**No Retaliation:** Alvah Group prohibits retaliation against anyone who raises concerns or is involved in an investigation and will investigate any reports of retaliation and take the appropriate action.

### Report a Compliance and Ethics Violation or Concern

Compliance and Ethics Helpline  
888-741-4139

[Compliance and Ethics Online Reporting Form](https://forms.office.com/r/kf9pMEBwNk)  
<https://forms.office.com/r/kf9pMEBwNk>

Compliance and Ethics Mailbox  
[Compliance.Ethics@alvahgroup.com](mailto:Compliance.Ethics@alvahgroup.com)

## Hiring Client Supplier Code of Conduct

Alvah Group strives to provide the highest quality utility infrastructure solutions to our customers, which includes adherence to their Supplier Code of Conduct.

All Suppliers performing work for Alvah Group on Pacific Gas and Electric (“PG&E”) projects must also read and comply with the PG&E Supplier Code of Conduct.

[PG&E Supplier Code of Conduct](https://www.pge.com/includes/docs/pdfs/b2b/purchasing/suppliers/SupplierCodeofConductPGE.pdf)

<https://www.pge.com/includes/docs/pdfs/b2b/purchasing/suppliers/SupplierCodeofConductPGE.pdf>