Code of Ethics
Manager’s Toolkit
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As you meet with your teams, incorporate these talking points into your discussion.

• Southern Company continues to live by a set of core values to help guide employees through everyday work and help them contribute to the growth and success of this company.

• Today, ethics and compliance is launching a new Code of Ethics to help bring those core values to life.

• The Code of Ethics encourages everyone working for Southern Company to strive for excellence and act ethically.

• These guidelines apply to all of us and remind employees that how we do our work is just as important as what we do.
Talking Points

The Code of Ethics defines ethical behavior broken down into:

• Safety and Health
• Our Employees
• Our Relationships
• The Environment
• Compliance with Laws and Regulations
• Financial Integrity
• Conflict of Interest
• Gifts and Entertainment
• Competitive Practices
• Confidential Information
• Political Activities and
• Duty to Act

Beginning Feb. 21, all employees will have access to the Code of Ethics, FAQs, policies and videos at coe.southernco.com or through the app in the company App Catalog. For printed copies of the Code of Ethics brochure, contact your company compliance office.

This information is also archived on mySOurce>managers>compliance.
Staff Meeting Talking Points

Session 1:

• **Safety and Health** – Safety is always first. We perform every job, every day, safely so we can return home to our families the same way we came to work.

• **Our Employees** – We treat each other with honesty, respect and fairness so that everyone feels comfortable sharing their ideas and opinions. This makes the company more successful.

• **Our Relationships** – We put the customer at the center of everything we do. Our customers, employees, regulators and stockholders expect us to do the right thing, all the time.
Session 2:

- **The Environment** – We strive to protect and preserve our natural resources by taking responsibility for our environment and supporting important stewardship.

- **Compliance with Laws and Regulations** – It is important to be a good citizen by complying to all laws and regulations both at work and at home.

- **Financial Integrity** – We must be responsible with all company assets, funds, property and records.
Session 3:

- **Conflict of Interest** – To protect our reputation with each other, our customers and the community, avoid conflict of interests.

- **Gifts and Entertainment** – Only offer and accept gifts and entertainment when they are a part of a reasonable business relationship.

- **Competitive Practice** – Never give the appearance of conducting business in an unfair way. Compete fairly and vigorously.
Staff Meeting Talking Points

Session 4:

• **Confidential Information** – Our company, customers, coworkers and partners’ confidential information is a valuable asset that must be protected and handled appropriately at all times.

• **Political Activities** – Employees are free to choose whether or not they support political activities, candidates, parties or positions.

• **Duty to Act** – Take personal responsibility to speak out when you see a violation of the Code of Ethics.
FAQs

Q: My manager asked me to do something that is not safe. How should I handle this request?
We do not compromise on safety, and we report and correct unsafe situations. You should never be asked to compromise your safety and health. If you are, you should respectfully and clearly tell your manager why you believe the activity is unsafe. If your manager disagrees, ask if you can bring in another supervisor or safety advisor for a third opinion. Good faith concerns about safety are generally considered to be an exception to the rule of “obey now, grieve later.”

Q: I want to follow all the laws that apply to my role. How do I learn about them?
If you have specific questions about any laws that you should follow, talk to your supervisor. In addition, the compliance website has links to policies, standards and guidelines that will help train you on important issues and rules to follow. If you or your manager needs more information, you can reach out to your company’s compliance officer or director.

Q: What information will I be asked if I contact the Concerns Program?
The Concerns Program needs to know the pertinent details of the event – including what happened, who was involved, and when and where it took place – to gather relevant information and thoroughly assess a situation. The company can only fix what it knows about and depends on you for that information. Employees who are contacted to participate in an investigation are expected to cooperate and to help keep the investigation as confidential as possible to protect the integrity of the investigation process.