

NEW JERSEY RESOURCES CORPORATION

LEGAL DEPARTMENT POLICY AND PROCEDURE 1

Code of Conduct Investigation Procedure

Originated On: 06/14/2004

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Reviewed On: 07/16/2013, 03/02/2017

Approved By: William P. Scharfenberg, Acting General Counsel

Rescinded On: N/A

1.0 Policy

New Jersey Resources Corporation (“NJRC”) and its subsidiaries (collectively, the “Company”) are committed to conducting business in an honest and ethical manner. The Company firmly believes that fair and ethical business practices are a fundamental part of good business conduct. Further, the very nature of our business imposes a special obligation to build and maintain a trust with the public. Through the [Code of Conduct](#) (“COC”), as well as other policies and procedures, the Company is firmly committed to conducting business in a professional manner that clearly satisfies all moral, legal and business obligations. The COC sets forth policies that are designed to help all employees make the right decisions while performing day-to-day tasks. Enforcing the COC, therefore, is critical to the Company’s commitment to fair and ethical business practices. To ensure a fair, efficient and thorough investigation of reported violations of the COC, the Company shall follow the procedure described below.

2.0 Persons who should be familiar with this policy and procedure

All Company Representatives.

3.0 Definitions

“Code of Conduct” or “COC” means the New Jersey Resources Corporation Code of Conduct.

“Company Representatives” means all directors, officers, employees, temporary employees and agents of the Company.

4.0 Forms

N/A

5.0 Procedure

1. All complaints alleging violations of the COC, whether initially received by the Human Resources Department (“HR”), the anonymous hotline, *i.e.*, Ethicspoint, an employee’s supervisor, or by any other department or employee and by any other method, shall be forwarded immediately to the Chief Compliance Officer (“CCO”) (who is

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also the General Counsel.) As stated in the COC, reporting may be anonymous and reports shall be made without fear of retaliation.

2. All COC complaints shall be entered on the COC Log, which is maintained by the CCO's staff.

3. Complaints will be promptly investigated by persons designated by the CCO, including, as necessary, representatives of HR. If necessary, the CCO may engage outside counsel, auditors or other experts to assist in the investigation.

4. Depending upon the nature of the alleged violation, the investigation may include interviews of the complainant, the subject(s) of the complaint and other persons that may have relevant information. Investigators may also review relevant and available documents and information.

5. The CCO or their staff shall report the results of an investigation to the complainant as soon after the conclusion of the investigation as practicable, provided that person's identity is known.

6. An employee who is the subject of a COC investigation shall be notified of the results of the investigation in writing. A copy of the notification shall be placed in the COC file, the employee's personnel file and the employee shall be subject to discipline as appropriate.

7. Any discipline that the CCO determines is necessary shall be implemented.

8. Any employee who refuses to cooperate with the CCO, the CCO's staff or any other person designated by the CCO to investigate a complaint, may be subject to discipline up to and including termination.

9. The CCO shall make regular reports of COC complaints and investigations to the Audit Committee of the Board of Directors. In particular, the CCO shall report violations involving fraud, internal controls, auditing or accounting to the Audit Committee.

10. All files regarding COC investigations shall be maintained by the staff of the CCO in accordance with the Company's records retention policy and procedure.

6.0 Standards

It is the policy of the Company to ensure that all Code of Conduct investigations are conducted in compliance with all applicable federal and state laws and regulations.

Confidential and anonymous mechanisms for reporting Code of Conduct violations are available, as described above and in the Code of Conduct. However, anonymous reporting does not serve to satisfy a duty to disclose a Company Representative's own involvement in a conflict of interest or in unethical or illegal conduct.

7.0 Guidelines

Any legal questions concerning a Code of Conduct investigation should be addressed to the General Counsel and Chief Compliance Officer.