



CODE OF ETHICS

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MESSAGE

From Marty Lyons



Our steadfast commitment to our customers, communities, and shareholders means that we always conduct our business with the highest ethical standards.

Results are important, but more important is how we get them. They would mean nothing if we weren't achieving them in a manner consistent with doing the right thing – every time.

Ameren's Code of Ethics details how we must operate as a company to ensure we maintain the trust of our company's key stakeholders.

Please review this Code carefully and keep it close. It can guide you in recognizing that sometimes the right decision or action may not always be the fastest or easiest.

When in doubt, ask. When you have concerns, speak up. You'll find options to reach out included in this Code.

Guided by an enduring strategy and a promise to always do business the right way, with a continuous improvement mindset – we will achieve even higher heights together.

Martin J. Lyons, Jr.
President and CEO

MESSAGE

From John Rhea



At Ameren, we take pride in our reputation. The Code of Ethics helps us protect it. It highlights what we believe and what we expect of our people—officers, co-workers, Board members, and others.

As a public utility, Ameren’s business is regulated in numerous and complex ways. The Code cannot anticipate and address every situation that could present legal or ethical issues. It can, however, help us identify and reduce unwanted risks; it explains our legal obligations; and it supports our commitment to act with unquestionable integrity.

The Code is the cornerstone of Ameren’s Ethics and Compliance Program. The Program is designed to prevent and detect violations of the law or ethical standards. As Ameren’s Chief Ethics and Compliance Officer (“CECO”), I’m responsible for the Program and its day-to-day oversight.

Aside from the Code, you may consult Ameren’s company-wide and/or departmental policies and procedures for additional guidance. Of course, you can ask me, your leadership, and our in-house attorneys any questions you may have concerning policies, procedures, and applicable laws. And I will work with other departments to coordinate specific guidance where needed.

When you reach out to me or our enterprise ethics and compliance team, I commit to you that I will follow up and not only will I report to the Board of Directors’ Audit and Risk Committee regularly, I will find ways to share the lessons we learn more broadly within our organization.

John D. Rhea, *Vice President, Chief Ethics and Compliance Officer*
CECO@ameren.com

WE ARE AMEREN

Our Commitments and Expectations

At Ameren, we do the right thing—whenever and wherever we operate. Our customers and communities expect it; shareholders and co-workers deserve it; and our regulators demand it.

Our Code of Ethics (“Code”) sets out what we stand for and expect as an organization. It is designed to help all of us, regardless of our role, responsibilities, or level of experience. It is a resource to inspire, guide, and enable us to do the right thing.

While it’s important and useful to consult the Code regularly, once a year Ameren provides a copy to all co-workers for review. At the same time, all management co-workers, officers, and Directors must

certify that they understand the Code and are unaware of or have spoken up regarding any potential incidents or conflicts of interest.

Regardless of our role, we have an obligation to speak up when we have questions or concerns about ethics and compliance matters. There are a number of resources to help us do this and they are listed on [page 10](#).

Our General Counsel and our Chief Ethics & Compliance Officer (“CECO”), together with the Board of Directors’ Audit and Risk Committee, have overall responsibility for this Code. When you speak up, they listen.

FOR ALL CO-WORKERS

We must all be familiar with the Code and ask questions when anything is unclear. We expect that all co-workers will:

- Read, understand, and uphold the spirit and letter of this Code
- Comply with Ameren policies and procedures, and all applicable laws
- Exhibit appropriate ethical behavior
- Speak up if you suspect ethical misconduct in a specific situation

FOR LEADERS

If we lead or supervise other co-workers or business partners, we:

- Lead by example, with awareness of how our behaviors and decisions influence others
- Recognize that perception matters—we must always do the right thing and never give anyone reason for doubt about our motives or actions
- Emphasize that the means are always as important as the ends

- Promote a positive work environment where everyone feels empowered to do the right thing, share ideas, and raise questions or concerns without the fear of retaliation
- Respond promptly and respectfully to questions and concerns, escalating where necessary to seek resolution
- Regularly communicate the importance of following our Code
- Never ask anyone—co-worker or business partner—to do anything that violates the Code
- Promote awareness of and access to company policies and procedures relevant to our teams' work
- Support ethics and compliance initiatives, including employee training, as essential business requirements
- Are proactive in helping our team members understand their business responsibilities and ethical obligations, develop their leadership skills, and advance their careers and relationships
- Refrain at all times from participating in or condoning conduct that would violate applicable laws, this Code, or company policy
- Never engage in or tolerate retaliation

This Code of Ethics is located [here](#). Co-workers can find other policies and procedures at Co-worker Connect.

Federal: Agencies, Boards, and Commissions

Antitrust Division
Army Corps of Engineers
Bureau of Labor Statistics
Bureau of Land Management
Center for Disease Control and Prevention
Citizenship and Immigration Services
Commission on Civil Rights
Committee on Foreign Investment in the United States
Commodity Futures Trading Commission
Community Planning and Development
Computer Emergency Readiness Team
Consumer Financial Protection Bureau
Copyright Office
Council on Environmental Quality
Cybersecurity and Infrastructure Security Agency
Department of Commerce
Department of Defense
Department of Health and Human Services
Department of Homeland Security
Department of the Interior
Department of Justice
Department of Labor
Department of State
Department of the Treasury
Department of Transportation
Economic Development Administration
Economic Growth, Energy, and Environment
Employee Benefits Security Administration
Endangered Species Program
Energy Information Administration
Energy Star Program
Environmental Protection Agency
Equal Employment Opportunity Commission
Executive Office for Immigration Review
Federal Accounting Standards Advisory Board
Federal Aviation Administration
Federal Communications Commission
Federal Election Commission
Federal Emergency Management Agency
Federal Energy Regulatory Commission
Federal Labor Relations Authority
Federal Motor Carrier Safety Administration
Federal Trade Commission
Fish and Wildlife Service

General Services Administration
Geological Survey
Government Accountability Office
Migratory Bird Conservation Commission
National Labor Relations Board
National Telecommunications and Information Administration
National Weather Service
North American Electric Reliability Corporation
Nuclear Regulatory Commission
Nuclear Waste Technical Review Board

Office of Disability Employment Policy
Office of Environmental Management
Office of Government Ethics
Office of Management and Enterprise Services
Office of Nuclear Energy
Occupational Safety and Health Administration
Patent and Trademark Office
Securities and Exchange Commission
SEC Reliability Corporation

Illinois Agencies, Boards, and Commissions:

Attorney General
Department of Commerce and Economic Opportunity
Department of Human Rights
Department of Human Services
Department of Innovation and Technology
Department of Labor
Department of Natural Resources
Department of Revenue
Department of Transportation
Emergency Management Agency
Environmental Protection Agency
Executive Ethics Commission
Human Rights Commission
Insurance department
Illinois Commerce Commission
Illinois Independent Tax Tribunal
Illinois Power Agency
Labor Relations Board
Office of Executive Inspector General
Pollution Control Board

Procurement Policy Board
Property Tax Appeal Board
Secretary of State
Treasurer

Worker's Compensation Commission

Missouri Agencies, Boards, and Commissions:

Attorney General
Clean Water Commission
Commission on Human Rights
Department of Commerce and Insurance
Office of the Public Counsel

Department of Conservation
Department of Economic Development
Department of Labor

Department of Natural Resources

Department of Revenue

Division of Energy

Emergency Response Commission

Illinois Department of Natural Resources

Authority

Ethics Commission

Geological Survey

Office of State and Community

Commission

Secretary of State

State Emergency Management Agency

State Oil and Gas Counsel

State Parks

State Tax Commission

Worker's Compensation Determinations Review Board

Iowa Utilities Board

Iowa Civil Rights Commission

Iowa Department of Human Rights

Iowa Department of Human Services

Iowa Department of Natural Resources

Iowa Department of Revenue

Other:

Multistate Tax Commission

We view compliance with laws and regulations as a minimum expectation. We aspire to do more than simply the minimum that we are required to do. Going the extra mile to do the right thing earns the trust of our customers and our regulators, and creates and preserves shareholder value.

When we aim higher, it helps to build a company and a culture of which we can all be proud.

DID YOU NOTE THE **BACKGROUND** OF THIS PAGE? This is an extensive, but not complete, list of federal and state administrative agencies that, in one way or another, provide some level of regulation, oversight, or influence of Ameren's business. This is why it is important to reach out for guidance.

OUR PROCESS

Asking the Right Questions

The Code is a resource to help us make good choices. While it contains a lot of helpful information, we do not expect anyone to solve a potential issue alone. Sometimes the Code makes the difference by helping us know the right questions to ask. When we find ourselves in a situation involving an ethics or compliance dilemma, it may be helpful to ask:

- **Have I fully considered the impacts of this decision on me, my co-workers, and the company?**
Decisions should not have negative impacts, whether financial or reputational.
- **Is there a rule, regulation, or Ameren policy that addresses this situation?**
Check, ask, and recheck to be sure.
- **Whom should I ask about this before acting?**
The enterprise ethics and compliance team, legal department, regulatory, human resources, internal audit, and others are there to help.
- **Would I be concerned if this was reported in the newspaper or to Ameren leadership?**
If you cannot stand by the action, you shouldn't take it.
- **My intentions are good, but could someone interpret this as inappropriate?**
Focus on the likely outcome of your actions and what a reasonable person might think.

WHEN IN DOUBT, REACH OUT.

John D. Rhea

Vice President, Chief Ethics and Compliance Officer

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The Code and Ameren's corporate policies, read together, guide our work at Ameren and serve as resources for good decision making. There should not be any conflicts between any of Ameren's policies. If there is a conflict, the policy that is more specific to the situation will apply over a more general policy.

Speak Up

Speaking up when we see or suspect a problem is essential and an obligation that we all share.

Coming forward with a concern allows the company to investigate and resolve the issue quickly to prevent it from becoming more serious. In this way, we help to keep ourselves, our co-workers, and communities safe and healthy; we manage risks to our business; and we preserve Ameren's reputation for integrity.

- Leaders are committed to empowering co-workers to share their thoughts, innovative ideas, and any concerns about how we do business and treat others.
- You are free to speak up confidentially, or even anonymously, through the mechanisms we set in this Code, and there is no retaliation for issues raised in good faith.

WE STRIVE TO ATTAIN A CULTURE WHERE WE ALL FEEL EMPOWERED TO SPEAK UP. **THERE SHOULD BE ZERO REASONS NOT TO.**

Q I observed an incident I think could be a violation of our Code of Ethics, but I am not sure. Should I report this even if I am not completely certain there is a problem?

A Yes. It is better to report a suspicion that turns out not to be an issue than to ignore a possible violation of the law or company policy. No one will ever face negative consequences for making a report in good faith. We are responsible for reporting violations immediately using one of the reporting methods found on [page 10](#) of this Code. While reporting to your supervisor is usually a first option, you may also contact the Chief Ethics and Compliance Officer or the Ameren helpline.

ALL REPORTS MADE IN GOOD FAITH ARE TAKEN SERIOUSLY. WE DO NOT HAVE TO BE CERTAIN OR RIGHT THAT THERE IS AN ISSUE; **WE JUST NEED TO BE HONEST.**

Q I witnessed something I think could be an incident, but I'm not an employee. Can I still submit a report?

A Yes. You do not need to be an Ameren employee to report a known or suspected concern. Everyone is encouraged to share information through the confidential phone number or website or an Ameren representative. This includes co-workers, contractors, customers, suppliers, investors, and anyone else who has a concern.

WE HAVE A RESPONSIBILITY TO REPORT KNOWN OR SUSPECTED VIOLATIONS OF THE LAW OR THIS CODE OF ETHICS.

Reporting an Issue

There are multiple avenues we can use to report potential issues:

- Notify our first- or next-level supervisor
 - Notify our Human Resources Business Partners
 - Call Ameren's helpline at 1-877-AMERENØ (1-877-263-7360)
 - Email CECO@ameren.com
 - Mail a letter to:
- Online at [AmerenØ.com](https://ameren0.com)
 - On your mobile device via the [Mobile URL](#)
 - Scan this QR code

Chief Ethics and Compliance Officer
1901 Chouteau Avenue, MC 1310
St Louis, MO 63103



First- or next-level supervisors who receive reports will promptly consult with the enterprise ethics and compliance team. Together, they will decide how to best handle the concern.

Reports made through [AmerenØ.com](https://ameren0.com) or through the helpline may be made confidentially or anonymously.

We encourage everyone to make reports openly. We value our transparent and supportive culture at Ameren; and, if we make ourselves available for additional questions, it makes investigations easier.

We realize, however, that you may sometimes prefer to make a report anonymously. In that case, we ask you to provide:

- Sufficient details about the relevant location or department
- Names and/or job titles of those involved – a report that “a co-worker is stealing from the company” would not be sufficient to conduct an investigation

WHEN REPORTING A CONCERN, IT IS IMPORTANT TO PROVIDE SUFFICIENT DETAILS TO ALLOW AN APPROPRIATE **INVESTIGATION OF THE FACTS.**

Q I know one option to report a potential issue is to tell my supervisor. But what if my supervisor is responsible for the potential issue?

A You have several additional options. You can reach out to the next-level leader, your HR Business Partner or the CECO. If you prefer, you can use the helpline (operated by a third party) at 1-877-AmerenØ (1-877-263-7360); as a further alternative you can make contact via [AmerenØ.com](https://ameren0.com), where you can identify yourself or share anonymously. Lastly, you can reach out at the [Mobile URL](#) or the QR Code shown here:



Ameren will not tolerate any form of retaliation against anyone making a good faith report (see “Zero Tolerance for Retaliation” on [page 11](#)).

What to Expect after Reporting

The CECO receives potential issues reported through the confidential Speak Up process. He will begin an investigation. The CECO will assign an investigator based on the required expertise. That investigator will fully vet the information and work to provide a response and/or corrective action. During this process, the investigator may ask for additional information.

While the investigator may contact supervisors in the course of the investigation, he or she will not identify the source of the report.

If you have made a report and wish to provide additional information or request an update, you should call 1-877-AmerenØ (1-877-263-7360) or visit [AmerenØ.com](https://www.ameren.com) and click on the tab labeled “Follow Up on a Report.”

When appropriate, the investigator will inform the person making the report of any responses or corrective actions. However, there are situations—especially those involving personnel actions—where privacy concerns prevent the investigator from revealing specific details of actions taken.

WE TAKE ALL REPORTS OF ILLEGAL AND UNETHICAL BEHAVIOR SERIOUSLY.

If the investigation finds violations of the law or this Code, the company may take disciplinary action up to and including discharge from employment. Certain violations may be serious enough that they are referred to legal authorities for investigation and civil or criminal prosecution.

Zero Tolerance for Retaliation

It is critical that we all feel comfortable and supported in raising a concern, if necessary—without fear of negative consequences.

Ameren has a strict policy prohibiting retaliation. This protects anyone who, in good faith, raises ethical concerns, reports a possible violation of the law, this Code, or any company policy, or cooperates with an investigation.

RETALIATION CAN TAKE **MANY FORMS**, such as firing, demotion, being denied a raise, harassment, missing out on training or mentoring activities, or other negative actions.

Any employee found to be engaging in such retaliation will be subject to appropriate disciplinary action, up to and including discharge. If you suspect that you are being retaliated against for speaking up, or observe retaliation against others, please report that concern using one of the reporting methods listed on [page 10](#).

Q I reported an incident anonymously, and my co-worker was reprimanded. Now, that co-worker is calling me a “narc” and telling my teammates not to trust me. What can I do? I’m afraid to report again.

A We prohibit retaliation for exactly this reason. We do not want you to be afraid to report any incident. Please report this behavior because it is another, separate violation of our Code and/or policies and appropriate additional disciplinary action can be taken.

Assessments and Exceptions

Assessments can help us avoid issues.

We have all heard the saying, “Prevention is the best cure.” That is the idea behind an assessment.

We know there could be questions about whether an action may be an issue. The enterprise ethics and compliance team is happy to answer these questions before we take an action. We may request an “assessment” through CECO@ameren.com, and the enterprise ethics and compliance team will examine the facts and ask questions so we will know if a particular action poses an issue, and if possible, alternative actions we could take.

Assessments are only effective for the situations specifically assessed. If the facts change, we may need to request additional guidance.

Exceptions are only for exceptional circumstances.

There may be times when an exception to this Code is appropriate. However, these times should be rare. If we have requested an assessment and discovered there is no other acceptable alternative available, then we may request an exception from the Code. These requests are also made through CECO@ameren.com.

A co-worker below the officer level may request an exception from part of this Code or other policies, but approval of these requests will only occur in exceptional circumstances and only after approval by the CECO.

A director or a co-worker at the officer level may also request an exception, but these requests must be approved by the CECO and the Board of Directors or a Board committee.

OUR PEOPLE

Valuing Our One-Ameren Team

We are dedicated to building a culture in which people feel included and valued for what they contribute.

WHY IT MATTERS

When we prioritize a skilled and highly qualified workforce with a variety of experiences and perspectives, every facet of Ameren benefits: we gain a broader range of ideas to inform decisions; and we foster a more productive work environment.

HOW WE DO IT

Valuing our variety of talents, ideas, and contributions means that we:

- Actively seek out alternative opinions and approaches
- Foster inclusive environments where everyone feels empowered to contribute
- Listen respectfully to each other so we can consider and benefit from thoughts and ideas different from our own
- Encourage our co-workers to engage collaboratively and treat each other respectfully
- Encourage co-workers to speak up if they see or suspect a problem

Treating Each Other with Respect

We treat each other with respect and fairness because it's the right thing to do and because it promotes trust, collaboration, and a positive work environment. When we provide everyone with the chance to succeed, based on merit and measurable skills, we attract and retain the best people and avoid unfair discrimination.

WHY IT MATTERS

We collaborate and serve our customers best when we interact with professionalism and respect. By being inclusive and listening actively, we learn from and support each other. By considering co-workers' perspectives and feelings, we build trust, gain insights, and avoid misunderstandings. By speaking up about any unwelcome or inappropriate workplace behaviors, we can help prevent anyone from feeling disrespected, threatened, or intimidated. Through these actions, we create a positive and supportive work environment that empowers us all to achieve excellence.

HOW WE DO IT

Treating each other with respect means that we:

- Base hiring and promotion decisions on qualifications and performance — never on favoritism or bias
- Avoid words or actions that degrade or disparage based on race, color, age, sex, or any other characteristic protected by law
- Provide reasonable accommodations for co-workers with disabilities or those with specific religious requirements, as necessary
- Help each other develop and reach our full potential
- Are mindful of the impact of our words and actions on others
- Address performance and behavioral issues privately, and not in a large group or public setting
- Remain sensitive to signs that others may be harassed or bullied
- No tolerance for discrimination and harassment

You can find more information in Ameren's Equal Employment Opportunity and Anti-Harassment Policy found on Co-worker Connect [here](#).

AMEREN PROHIBITS DISCRIMINATION BASED ON:

- Race
- Color
- Religion
- Sex
- National origin
- Ethnicity
- Age
- Disability
- Genetic information
- Military service or status
- Pregnancy
- Marital status
- Sexual orientation
- Gender identity or expression
- Any other class, trait, or status protected by applicable laws

Q My supervisor gave my male colleague overtime, but sent me home saying that as a woman, it was more important I make dinner for my family. Was this appropriate of him to do?

A No, that was not appropriate. Ameren does not condone such behavior. We ask that you immediately report this incident using one of the reporting methods described on [page 10](#).

Keeping Each Other Safe

We are committed to the safety, health, and security of our co-workers, others involved in our operations, and the communities we serve.

WHY IT MATTERS

As a utility provider, Ameren has a vital responsibility for the safety and security of its employees and its customers. When we think about safety first, it allows us to focus on doing excellent work without the worry of being harmed. Our responsibility extends to environmental, health, or safety issues that could pose risks beyond our immediate work area or facility. This helps us maintain the confidence and trust of the communities in which we operate.

HOW WE DO IT

Keeping ourselves and our communities safe means that we:

- Comply with all applicable safety laws and policies
- Are conscious of our surroundings and look out for our co-workers
- Do not work while under the influence of drugs or alcohol
- Adopt a zero-tolerance approach to threatening or violent conduct in the workplace and report it immediately if it ever occurs
- Do not bring any weapons to work
- Do not hesitate to stop work if it is unsafe

For more information, see Ameren's Workplace Violence Policy and Alcohol and Drug Policy found on Co-worker Connect [here](#) and [here](#), respectively.

Q My co-worker and I had a disagreement regarding a strategy. During our debate in my office, the co-worker cleared her throat and revealed a pistol holstered under her jacket. She asked if I still disagreed. I felt threatened. What should I do?

A Immediately report this behavior using one of the reporting methods described on [page 10](#).

OUR ENERGY BUSINESS

Valuing Our Customers

We are committed to being a trusted energy partner and powering the quality of life for our customers.

WHY IT IS IMPORTANT

Without our customers, Ameren would not exist. We serve them with pride, striving daily to provide them with safe, reliable, and cost-effective energy.

HOW WE DO IT

We show that we value our customers when we:

- Take appropriate safety precautions in providing services
- Continually seek efficiencies and ways to improve processes
- Safeguard customers' confidential information, always collecting, using and storing it in compliance with applicable laws
- Operate within the guidelines and assessing the charges found in our tariffs
- Provide service without undue preference or unreasonable discrimination
- Conduct all marketing activities fairly and honestly

Q I have a friend who is building a new house. He hoped I'd be able to get him a discount for his gas line extension. Can I do that?

A No, you can't. The jurisdictions where we operate do not allow us to provide any preference to just one customer when there are others in the same situation.

Q I wanted to pay my mother's utility bill as a surprise. Can I look at her account balance so I know how much to pay?

A No. While your intentions are good, privacy laws in the states where we operate prohibit access to customer-specific information without the customer's permission.

Ameren's tariffs, which are approved by its regulators and govern how we interact with our customers, can be found [here](#).

Preventing Bribery and Corruption

We succeed because of our quality and never engage in bribery or other corrupt practices.

WHY IT MATTERS

We have worked hard to build credibility and trust with our regulators, our investors, and our communities. Bribery and other corrupt practices are illegal. We do not engage in bribery or any other corrupt practices and we do not allow anyone to do so on our behalf. There are many state, federal, and local laws governing how Ameren can interact with different government officials. This includes how we lobby, give gifts, and make political contributions. Failing to conduct ourselves ethically, honestly, and legally would undo so much good work we've already accomplished. It could also result in civil lawsuits or criminal prosecution. We must always operate with integrity.

HOW WE DO IT

Preventing bribery and corruption means that we:

- Refuse to offer or accept bribes, kickbacks, or anything of value that could improperly influence a business decision—or appear to do so
- Take care not to promise or provide anything of value to public officials or anyone else to gain a business advantage
- Apply company policies when it comes to giving or receiving business gifts and entertainment
- Follow the letter and the spirit of anti-corruption laws everywhere we do business
- Do not use a third party to do anything improper on our behalf
- Do not make a political contribution or give any kind of gift for the purpose of gaining political favor
- Avoid engaging in lobbying activities without appropriate registration, if required by the relevant jurisdiction (See also “Participating in the Political Process” on [page 30](#))
- Do not give money or anything else of value to any union or labor organization for any illegal purpose
- Comply with any necessary additional accounting and contracting requirements when contracting with governmental entities
- Understand that anything provided to a government official may need to be handled in a special manner, even if it's just a catered meal

Immediately report any bribery or corruption concerns via the channels listed on [page 10](#).

A BRIBE IS A PAYMENT, favor, or other consideration given dishonestly or illegally in order to influence someone's behavior or encourage a particular outcome.

EXAMPLE: You hand a check for \$1,000 to an elected official in exchange for that official voting in favor of legislation you want passed.



A KICKBACK IS A TYPE OF BRIBE INTENDED AS COMPENSATION for preferential treatment or any other type of improper services received.

EXAMPLE: You selected a winning bidder for a project in exchange for that vendor giving you \$500 cash.

Ameren strictly prohibits bribes, kickbacks, and other such activities. Engaging in this behavior will result in disciplinary action up to and including discharge from employment. In addition, you may be subject to criminal prosecution or civil legal action. Ameren will report these activities to, and cooperate fully with, law enforcement if these situations arise.

At Ameren, we comply with the Foreign Corrupt Practices Act of 1977 (“FCPA”). The FCPA prohibits co-workers and Ameren agents and representatives from making payments or offers of payments of anything of value to foreign officials, political parties,

or candidates for foreign political office, in order to secure, retain or direct business, or to influence a person working in an official capacity. This includes payments made indirectly through an intermediary under circumstances indicating that such payments would be passed along for prohibited purposes. The FCPA contains significant internal accounting control and record keeping requirements that apply to Ameren’s domestic operations. The FCPA requires these records to ensure that a corporation maintains reasonable control over its assets and all transactions involving those assets.

Q I want to do something nice for the local elected officials I work with every day on Ameren issues. I want to use my company card to purchase them all gift cards for a local coffee shop. It would only be \$25 per gift card, and I’m not asking for anything in return. Is this acceptable?

A No. While you are not intentionally creating a conflict of interest, your actions could give others the impression that you expect favorable treatment in return. The amount of the gift doesn’t matter, nor does the fact you do not expect anything in return.

Q I was approached by a legislator who said she would advocate for a bill we would like passed if we found an open job position for her niece. Is this allowed? It benefits everyone involved.

A No. Even if there are steps in between, this would still be the provision of something of value in exchange for favorable treatment. You should report this communication immediately using one of the available reporting methods found on [page 10](#).

Q One of our regulators is conducting an audit. We are having food brought in for our co-workers. Can we just order extra and feed our auditors, too?

A. It depends on the jurisdiction. Some jurisdictions set a maximum dollar value; some only allow food that can be eaten standing up, and some jurisdictions prohibit it all together. Most likely, if the auditors can participate in the catered meal, they will need to know how much it costs per person so they can reimburse Ameren and avoid any potential conflict. Contact the legal department or the enterprise ethics and compliance team to help you find the answer.

DO YOU KNOW WHY WE GENERALLY DO NOT ALLOW THE PURCHASE OF GIFT CARDS WITH AMEREN FUNDS? Gift cards are a cash equivalent, and gifting cash or cash equivalents all create the same issues. While we can trace how a corporate credit card or check issuance is used, tracing how cash and cash equivalents are used is extremely difficult, if not impossible. This could hinder Ameren in meeting disclosure or auditing requirements. The use of cash and cash equivalents also creates issues when it comes to determining whether the gift is taxable. For more information regarding gift cards, see the Gift Card and Other Taxable Fringe Benefits Policy located [here](#) on Co-worker Connect.

Competing Fairly

We conduct our business fairly and legally, wherever we do business.

WHY IT MATTERS

Even though our utilities are regulated monopolies in the areas we serve, Ameren operates its business ethically and honestly. We remain subject to antitrust laws. These laws are designed to promote free and fair competition; they prohibit practices or agreements that unreasonably restrain trade or commerce. Violation of the antitrust laws can lead to civil or criminal penalties for companies and individuals. We compete fairly and honestly because we abide by applicable laws, it's good for business, and it is the right thing to do.

HOW WE DO IT

Competing fairly means that we:

- Conduct competitor research through publicly available sources like published tariff sheets and industry surveys
- Establish the price for our services through regulatory processes
- Avoid actions that, unless approved by a regulator, would be considered antitrust activities

DEFINING “UNREASONABLE RESTRAINT ON TRADE OR COMMERCE” DEPENDS ON THE SITUATION.

Because Ameren is a regulated monopoly, some practices that would typically be prohibited may be allowed for us, if we receive regulatory approval. In fact, some of the prohibited practices—fixing rates with a formula and dividing service territories—are common practice for some of Ameren’s affiliates. However, they are common practice because they are approved and monitored by our regulators.

So, what would be considered an antitrust violation? Unless we have regulatory approval to do so, we do not engage in the following actions that would typically be considered illegal:

- **Tying** is a sales practice which requires a customer to purchase unwanted products or services in order to get the product or service they actually want.
- **Refusals to Deal** involve agreements between competitors, oral or written, not to buy from a supplier or vendor, or an agreement not to sell products or services to a particular customer. In other words, the decision concerning with whom to do business and how much to pay for products and services must be made independently, and not by group consensus among competitors.
- **Agreement to Limit Supply** is an agreement or understanding between competitors to restrict the volume of goods they will produce or make available for sale.
- **Price Fixing** is an agreement, understanding, or arrangement between competitors to raise, lower, fix, or stabilize prices. Price Fixing may also include an adherence to a formula for determining a price, standard discounts, credit policy, or terms of sale. Never use a third party to do anything improper on our behalf.
- **Allocation of Customers or Territories** means that competitors, without regulatory approval, have allocated customers or service territories.

Q I was at a conference and noticed that my friend, who works for another utility, left his laptop open and unlocked. He had a confidential file open with details about a facility they are building. Knowing how much they’re willing to pay could help me figure out what price I could get from the same vendors. It’s not my fault he didn’t secure his data. Can I have a look, if it could benefit Ameren?

A No. It doesn’t matter if your friend did not secure his information. You know this is a confidential document you should not have access to. You may not look at or use this information.

Q I told my neighbor that she had no choice but to have us provide electric service to her property since she’s in our electric service territory. But service territories seem to be prohibited by antitrust laws. Have I broken the law?

A No, you haven’t. Establishing service territories is allowed by the law in the states where we operate. If the regulator has approved a service territory, there is no antitrust violation.

OUR COMPANY AND SHAREHOLDERS

Avoiding Conflicts of Interest

We make decisions and act in Ameren's best interests, free from the influence of our personal interests and relationships.

WHY IT MATTERS

We must not allow our personal interests or relationships to get in the way of what is best for the company. Even the appearance of a conflict of interest could damage our reputation and credibility. Objective, thoughtful choices, on the other hand, demonstrate a commitment to integrity and service, and work for the benefit of all.

HOW WE DO IT

Avoiding conflicts of interest means that we:

- Proactively identify situations that could put the company's interests and our own into possible conflict
- Disclose actual or potential conflicts to the CECO when we identify them
- Remove ourselves from the decision-making process when a conflict may exist
- Avoid allowing our desire to help friends and family to influence our decisions at work
- Build relationships based on trust, never through either giving or receiving inappropriate gifts or hospitality
- Do not allow any outside job or activities to take over Ameren time and resources
- Do not keep for ourselves opportunities gained through our positions or resources
- Accept outside employment, directorships, or other positions only if they:
 - Do not interfere with our duties at Ameren
 - Do not risk harming the company's reputation
- Grant permission for an activity that otherwise appears to be a conflict of interest only because it remains consistent with the interests of Ameren and its shareholders

WHAT IS A CONFLICT OF INTEREST? As we use the term in the Code, a conflict of interest is a situation where our interests and Ameren's interests are incompatible. Conflicts of interest—and sometimes even the appearance of such a conflict—can damage not just our reputation, individually and collectively. **If you have any questions about whether there is a potential conflict, or if you believe you may qualify for an exception, you must request an assessment or exception before accepting the position. Please see [page 10](#) of this Code for information about requesting an assessment.**

Q A large customer wants to locate in our service territory. I'm working with them to identify economic development benefits. The customer would like to use a rate that they really don't qualify for. They've offered my daughter box seat tickets to a Cardinals game. Can she accept the tickets?

A She should decline the gift. While it could be an innocent offer, it could be interpreted as trying to gain favor and influence your decisions.

Q I received a gift from a vendor. May I keep it?

A It depends on the gift. Generally, we are allowed to accept gifts that do not exceed \$250 in value and are not intended to influence our business decisions. That said, we cannot accept cash and cash equivalents, like gift cards, in any amount for the reasons stated on [page 19](#) of this Code.

Q A consulting firm reached out and offered me \$150 an hour to provide my industry insights. They aren't asking for any confidential information, and said the phone call should last two hours, tops. Can I do this?

A No. This would essentially be getting paid for the same work you are already doing for Ameren, which could create conflicts, or at least the appearance of conflicts. There is also a chance that information Ameren considers confidential could accidentally be shared. Sometimes these consultant outreaches are in the forms of surveys in exchange for gift cards. This still presents the same issue.

Taking Care of Ameren's Assets

We protect Ameren's assets because they are the backbone of the utility infrastructure and are crucial to our future success.

WHY IT MATTERS

Ameren's assets—physical, cyber, financial, and intangible—are essential to our operations and growth. They are part of the utility infrastructure that allows us to safely and effectively serve, support, and invest in the communities we call home. We are all responsible for ensuring that Ameren's assets are used for legitimate business purposes and not wasted or misused.

HOW WE DO IT

Taking care of Ameren's physical assets means that we:

- Only use them in an authorized manner
- Never leave portable assets, like work computers and phones, unattended
- Limit personal use of company communications equipment and systems
- Never allow someone to "piggyback" through an Ameren entryway after we've badged in

PHYSICAL ASSETS include things such as buildings, vehicles, office equipment, telephones, tools, materials, supplies, computers, etc.

Taking care of Ameren's cyber assets means that we:

- Think before we click on links or email attachments from external sources
- Report suspected phishing using the "PhishAlarm" button in our Outlook toolbars
- Change passwords regularly
- Lock computers, phones, and tablets when we're not using them
- Only use Ameren-approved software and applications on company computers and devices
- Use the approved VPN system to log onto the Ameren network remotely
- Follow Ameren policies and procedures that address the standards put in place by the North American Electric Reliability Corporation ("NERC")
- Ensure our suppliers have appropriate cybersecurity measures in place

CYBER ASSETS include computer and smart device hardware, software, servers, etc.

Taking care of Ameren's financial assets means that we:

- Keep accurate and timely financial records
- Use Ameren's financial assets only as allowed
- Do not openly discuss financial information that is not yet public

FINANCIAL ASSETS include cash, capital structure, investments, stocks, bonds, mutual funds, and bank deposits.

Taking care of Ameren's intangible assets means that we:

- Ensure our logos are used appropriately
- Take care, both at work and outside of the workplace, that documents are secured and not visible to others
- Do not discuss confidential matters when there is a risk of being overheard

INTANGIBLE ASSETS include our brand, our reputation, trade secret information, intellectual property, etc.

In all cases, we can protect Ameren's assets by reporting circumstances to the CECO where we see these assets at risk. See the reporting procedures located on [page 10](#).

For more information regarding authorized asset protection and authorized use, please see Ameren's Data Protection, Privacy, and Security Policy, applicable corporate and technology policies, the Employee and Visitor Badging Policy, and brand-usage guidelines located [here](#), [here](#), [here](#), and [here](#), respectively, on Co-worker Connect.

Handling Data Carefully

We safeguard the personal data and confidential business information of co-workers, candidates, customers, business partners, and infrastructure.

WHY IT MATTERS

In the digital age, data privacy and security is more important than ever. Everyone has the right to expect that their data, as well as the infrastructure Ameren uses to provide service, will be kept safe and out of the hands of those who might misuse it. In the course of Ameren's business, we need to collect, store, use, and share information. It allows us to manage our relationships with customers and business partners; administer co-worker benefits; protect the energy grid; and comply with legal requirements, among other things. By treating information with proper protections, we safeguard what is precious to our people and those we serve, avoid legal penalties, and maintain our reputation as a trusted energy partner.

HOW WE DO IT

Handling data carefully means that we:

- Are familiar with our internal data protection and security policies
- Understand that various types of data have different handling requirements
- Only access the data we need to perform our duties and do so in an authorized manner
- Do not share the personal information of any customer, co-worker, director, or shareholder unless we are authorized to do so
- Make sure our suppliers have security measures in place that are appropriate for the types of information they will handle

For additional information about Ameren's data protection standards, please see the Data Protection, Privacy, and Security Policy and its corporate technology policies [here](#) and [here](#), respectively, on Co-worker Connect.

Creating and Reporting Accurate Business Information

We create and maintain accurate business records because they help us operate efficiently and allow us to provide timely and accurate information to our customers, investors, regulators, and other stakeholders.


WHY IT MATTERS

As a regulated public utility, we must create and maintain accurate business records. If our records are inaccurate or incomplete, this could hinder our ability to provide services effectively; it could also affect our financial stability and reputation. We rely on our business records to operate effectively. Our regulators rely on our reports to ensure we are operating as allowed by law. Shareholders rely on this information for investment decisions. Lenders rely on this information to provide financing. Inaccurate or missing financial records could suggest possible fraud and potentially expose Ameren to serious criminal and civil penalties.

HOW WE DO IT

Creating and maintaining accurate business records means that we:

- Record transactions using the generally accepted accounting principles (“GAAP”) and using Ameren’s internal control procedures
- Record our time worked accurately
- Correct errors promptly and notify those affected
- Know what is and what is not a “business record”
- Retain business records for the time periods mandated by law or company policy
- Store business records safely and appropriately
- Comply with any legal holds that may require information be retained longer than the period set out in internal policies
- Speak up when we have any questions or concerns about accurate reporting and appropriate record retention



DID YOU KNOW IT IS JUST AS IMPORTANT TO APPROPRIATELY DISPOSE OF INFORMATION AS IT IS TO RETAIN IT? Certain written documents should be shredded rather than just tossed in a trash can. And some electronic records held onto for too long will become unusable because of technology changes.

For more information, see Ameren’s accounting policies, Records Management Policy, and Legal Hold Policy, located [here](#), [here](#), and [here](#), respectively, on Co-worker Connect.

Q I am working on a project at an Ameren Missouri energy center, which is running over budget, and helping with a vegetation management project for Ameren Illinois, which is running under budget. Can I charge my time spent working on the Ameren Missouri project to the Ameren Illinois project instead? After all, they're both Ameren companies.

A No, you can't. Allocating your time correctly is very important and errors can cause very real issues, including:

- The wrong customers pay the costs – Ameren Illinois customers would pay these costs, even though Ameren Missouri customers are the ones receiving the benefits.
- Capital project costs and O&M costs are recovered differently – Completing improvements to an energy center is a capital project, while vegetation management typically is an "operations and maintenance" (O&M) expense. The company is allowed to earn a return on capital projects, but can only recover actual O&M costs.
- It can hurt our reputation – Ameren's regulators pay close attention to how costs are allocated between subsidiaries. The more these errors occur, no matter how unintentional, the less our regulators trust us to get it right.

Preventing Insider Trading

We never use or share inside information about Ameren or other companies for the purposes of trading securities.

WHY IT MATTERS

As part of our duties, we may become aware of information about Ameren, its subsidiaries, or another company that is not public. That information may be useful from an investor's standpoint. Our customers, investors, and regulators count on us to treat such information with care. We cannot use "material, non-public" (inside) information to inform our own investment decisions or to provide tips to others. That is not only unethical, it is illegal. Violations of insider trading laws are serious, and can lead to fines or even imprisonment.

HOW WE DO IT

Preventing insider trading means that we:

- Avoid buying or selling securities when we possess material, non-public information
- Do not pass material, non-public information on to others who may buy or sell securities

Some of us may also be prohibited from buying or selling securities during designated blackout periods. Ameren will notify those who are part of this group when these blackout periods occur.

For more information, see Ameren's Insider Trading Policy found [here](#) on Co-worker Connect.

WHAT IS CONSIDERED "MATERIAL" INFORMATION?

- Projection of future earnings or losses
- News of a pending or proposed merger, acquisition or tender offer
- News of a significant sale of assets or the disposition of a subsidiary
- Changes in dividend policies or the declaration of a stock split
- Management changes
- Impending financial liquidity problems
- Gain or loss of a substantial customer
- Cyber security risks and incidents, including any investigation of a potential incident
- News of significant regulatory or court actions

OUR BUSINESS PARTNERS

Fostering Healthy, Productive, and Cost-Effective Business Partnerships

We select our business partners based on merit, and we treat them fairly.

WHY IT MATTERS

We work closely with our business partners, whether they supply us with paper and pens, parts and wires, or professional services. When we nurture these partnerships, we improve the quality of work, create more opportunities for innovation, and reduce costs. In other words, these relationships can be profitable for us, for our business partners, and for our communities.

HOW WE DO IT

Creating healthy, productive, and cost-effective business partnerships means that we:

- Do business with partners who not only best meet our needs, but also comply with our Code and all applicable laws and regulations:
 - *Complying with anti-bribery laws and all other applicable laws*
 - *Respecting human rights conventions, etc.*
- Evaluate potential partnerships based on clear performance measures, such as quality, price, service, reliability, and availability
- Utilize competitive bidding processes when appropriate, and invite at least three suppliers to bid when possible
- Treat all current and potential partners fairly and with integrity, regardless of the transaction value or length of the relationship
- Avoid conflicts of interest (or the appearance of any conflicts of interest) by not selecting a partner based on friendships, family relationships, or financial interests
- Decline gifts, entertainment, or any kind of favoritism that might inappropriately influence the business partner's selection
- Formalize business relationships in writing to provide transparency and accountability

Additional information regarding Ameren's Supplier opportunities can be found [here](#).

Additional information regarding Ameren's procurement policies can be found at Co-worker Connect [here](#).

Dealing Impartially with Our Affiliates

We deal with our affiliates as we would deal with any other business—fairly and in compliance with applicable laws.

WHY IT MATTERS

Ameren Services Company, Ameren Missouri, Ameren Illinois, and Ameren Transmission Company of Illinois are subsidiaries of Ameren Corporation and are considered “affiliates.” On a daily basis, these affiliates are talking to and doing business with each other. Proper controls help us prevent potential issues, such as shifting the costs incurred by one affiliate to another.

HOW WE DO IT

Dealing impartially with our affiliates means that we:

- Comply with the affiliate transaction and market rules put into place by our regulators:
 - *Federal Energy Regulatory Commission*
 - *Illinois Commerce Commission*
 - *Missouri Public Service Commission*
- Treat an affiliate as we would any other company, by:
 - *Not paying the affiliate a price for goods or services that we wouldn't pay to an unaffiliated company*
 - *Not sharing protected or restricted information, like market data or customer-specific information, between affiliates without making sure it is allowed*
- Consult with supervisors or a regulatory attorney in the legal department to find out the specific regulations that apply

OUR WORLD

Protecting the Environment

We are committed to operating sustainably as a responsible corporate citizen.

WHY IT MATTERS

We believe that a sound and sustainable environmental policy benefits all of us, including our customers and our shareholders, by enhancing the communities we serve. From preventing and controlling pollution to deploying innovative technologies that helps us operate cleanly, we are building a legacy of environmental stewardship.

HOW WE DO IT

Protecting the environment means that we:

- Perform duties in a manner that facilitates Ameren's compliance with applicable environmental laws, permits, rules, and regulations
- Be a good steward of the environment
- Ask ourselves, can you leave it better than you found it?
- Consider environmental factors in planning and managing our operations and purchases
- Strive to prevent pollution
- Reduce, reuse, or recycle wastes
- Monitor and improve environmental performance
- Promote energy efficiency

More information about Ameren's Environmental and Sustainability efforts can be found [here](#).

Building Strong Communities

We believe in making an impact in our service territories through employee volunteerism, customer education, philanthropic support, and non-profit board service.

WHY IT MATTERS

We believe that we are only as strong as the communities we serve. We are active partners in our communities, volunteering our time, resources, and talents to help communities prosper.

HOW WE DO IT

Engaging meaningfully in our communities means that we:

- Encourage and celebrate the active roles we take in our communities as volunteers, mentors, and community builders
- Support worthwhile civic and charitable causes and reviewing them to ensure desired community impacts
- Work closely with community partners to identify the most effective methods of support
- Guide our giving through our first identified impact pillars:
 - *Economic Empowerment*
 - *Critical Needs*
 - *Thriving Communities*

More information about Ameren's charitable programs can be found [here](#).

Participating in the Political Process

We engage thoughtfully in the political process, advocating for our interests while bringing positive change to our communities.

WHY IT MATTERS

We participate responsibly in the political process. We understand and respect the legal limitations on corporate political contributions and lobbying activity. As part of our commitment to work-life balance, we encourage our co-workers to participate in civic and political affairs as active and informed citizens. Contributing our private time or financial support to political activities helps us stay engaged and invested in our communities' well-being and future.

HOW WE DO IT

Participating responsibly in the political process means that we:

- Do not contact government officials on any legislative, regulatory, policy, or electoral matter unless authorized to do so
- Comply with all legal limitations on corporate contributions to parties, political committees, and individual candidates
- Use Ameren's voluntary, non-partisan, non-profit Political Action Committees ("PACs") if we want to participate in supporting state and federal candidates who share the company's perspective on critical issues affecting our industry

- Do not pressure our co-workers to contribute to a PAC or contribute a certain amount
- Avoid making any employment decisions based on whether someone contributed to a PAC
- Support the political candidate of our choice without using our job titles or Ameren's name, unless we have permission or are required to by law
- Do not solicit political contributions, support, or assistance for personal political involvement from others at work
- Do not, if we hold a public office, participate in discussions or decision-making that directly involves Ameren

PACs AND CONTRIBUTIONS MADE BY AMEREN TO ANY PAC

are regularly audited to ensure contributions are made with integrity and honesty.

Q I was going to run for City Council, and I was really hoping to talk to my co-workers about my campaign in a staff meeting and see if I could count on their votes. Is that allowed?

A No. You must keep your personal politics and your professional duties separate. And if you win, we ask that you recuse yourself from any decisions or discussions that might involve Ameren so that both you and the company can maintain your integrity.

Building Trust and Connections Through Responsible Communications

We strengthen our brand, communities, and stakeholder relationships through thoughtful, accurate, and consistent communications and responsible engagement with social media.

WHY IT MATTERS

We communicate truthfully, accurately, and consistently with customers, investors, and other stakeholders. This helps us build lasting relationships based on trust. We remember that we are all ambassadors for Ameren's brand. We show leadership and professionalism and preserve our reputation by using social media responsibly. We let colleagues with the proper authority and experience handle external inquiries.

HOW WE DO IT

Communicating responsibly means that we:

- Exercise good judgment and personal responsibility in our online activities
- Are open and honest about our identities as Ameren co-workers and make it clear when we are expressing personal opinions, not the company's views
- Never disclose or distribute Ameren's protected or restricted information through social media
- Never post content online that is false, malicious, obscene, or otherwise offensive or illegal
- Do not comment on behalf of Ameren unless it is part of our job duties
- Refer requests for information about Ameren to the appropriate department (e.g., Investor Relations for industry analyst inquiries and Corporate Communications for media questions)
- Never let our time and effort spent on social media interfere with our job responsibilities

Please see Ameren's [Social Media Policy](#) on Co-worker Connect for the most up-to-date direction regarding appropriate social media use.

IF WE USE OUR **SOCIAL MEDIA ACCOUNTS** ON AMEREN'S SYSTEMS, THAT ACTIVITY CAN BE MONITORED.

Related Policies

Co-workers can find policies referenced throughout this Code on Co-worker Connect.

[Accounting Policies](#)

[Affirmative Action and EEO Policy Statement](#)

[Alcohol and Drug Policy](#)

[Ameren Internal Labor Related Guidelines for Managerial/Supervisors Prohibited Transactions and Expenditure Reporting Section 302 and Form LM-10](#)

[Ameren Regulation FD Policy](#)

[Accommodating Disabilities Policy](#)

[Commercial Motor Vehicle Driver Policy](#)

[Communications Policy for Use of Ameren's Name by Suppliers](#)

[Contingent Worker Policy](#)

[Contract Accounting Assessment and Repository Policy](#)

[Contract Development and Use Policy](#)

[Corporate Technology Policies](#)

[Data Protection, Privacy, and Security Policy](#)

[DOT Daily Driver Vehicle Inspection Report Policy](#)

[EEO and Anti-Harassment Policy](#)

[Employee and Visitor Badging Policy](#)

[Employment Verification Policy](#)

[Family and Medical Leave Act Policy](#)

[Flexible, Hybrid, and Remote Working Policy](#)

[Gift Card and Other Taxable Fringe Benefits Policy](#)

[Insider Threat Policy](#)

[Insider Trading Policy](#)

[Inventory Policy](#)

[Investment Recovery and Sales Policy](#)

[Leave of Absence Policy](#)

[Local Petty Cash Funds Policy](#)

[Management Control Policy](#)

[Management Employee Discipline Policy](#)

[Management Vacation Policy](#)

[Military Leave of Absence Policy](#)

[Motor Vehicle Driver Safety Policy](#)

[Parental Bonding Leave Policy for Management Employees](#)

[Personal Relationship Disclosure Policy](#)

[Procurement Policy](#)

[Records Management Policy](#)

[Severance Plan for Ameren Employees](#)

[Smoking Policy](#)

[Social Media Policy](#)

[Vacation Donation Policy](#)

[Vehicle Axle Weight Policy & Compliance Procedure](#)

[Veterans and Individuals with Disabilities Self Identification Policy](#)

[Workplace Violence Policy](#)

Additional Information

References to “Ameren” include Ameren Corporation and its subsidiary companies.

References to “Directors” mean members of the Board of Directors of Ameren or its subsidiary companies.

“Co-worker Connect” is Ameren’s internal-only website and links directing to it will not work if you are external to the company.

Reports made confidentially and/or anonymously will be held confidential and/or anonymous unless circumstances do not allow.

Those making reports will be kept apprised of the outcome of those reports unless circumstances prohibit disclosure.

Nothing in this Code prohibits a co-worker from reporting possible violations of laws or regulations to any state or federal governmental agency or entity, including but not limited to the Department of Justice, the Securities and Exchange Commission, the Congress, state Attorneys General, state legislatures or legislators, the Federal Energy Regulatory Commission, the Illinois Commerce Commission, and the Missouri Public Service Commission, or making other disclosures that are protected under the whistleblower provisions of state or federal laws or regulations. Co-workers do not need the prior authorization of Ameren’s legal department to make any such reports or disclosures and are not required to notify the company that such reports or disclosures have been made. Ameren prohibits any retaliation for making such reports.

The Code of Ethics is neither an employment contract nor a change or modification of the current relationship between any employee and Ameren whether it is employment-at-will or governed by a collective bargaining agreement between Ameren and a Union.

Nothing in this Code should be interpreted in a manner that interferes with protections under the National Labor Relations Act, including but not limited to discussing wage and compensation information with another.

Nothing in this Code or in other Company policies limits your ability to file a charge or complaint with the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the Securities and Exchange Commission, the Department of Justice or any other federal, state or local governmental agency or commission (“Government Agencies”) regarding a possible violation of law or regulation. Nothing in this Code or in other Company policies limits your ability to communicate directly with any Government Agencies or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including providing documents or other information not otherwise protected from disclosure by any applicable law or privilege, without first seeking Company authorization or notifying the Company of any such communication. Your right to contact, communicate or file a charge or complaint with any Government Agencies takes precedence over your obligation to respect confidentiality, with the exception of information that is protected from disclosure by any applicable law or privilege. Neither this Code, nor any other Company policy limits your right to receive an award for information provided to any Government Agency.

Annual certificates of compliance will take a form substantively similar to the following:

Certificate of Compliance

All management co-workers, officers, and Directors will complete an electronic certification substantively similar to the statement below during Ameren's annual certification process.

- ☐ I understand the Company's policies regarding reporting possible violations of Company policies and the Company's policy regarding non-retaliation against those reporting possible violations of any Company policy and agree to comply with the Company's Code of Ethics ("Code").

I have reviewed and am familiar with the Code and, during the period from January 1, 20__ to December 31, 20__, either:

- ☐ I am not aware of any violation of any policy, rule, or principle set forth in the Code (including by myself or any member of my immediate family); or
- ☐ I have reported any violations of which I am aware either to my supervisor(s) or other appropriate person or anonymously as outlined in the Code; or
- ☐ I am a compliance or human resources professional who either is not aware of, or has already reported, any violations I am aware of that are not related to the conduct of my job duties.
- ☐ I am either not aware of or have notified my supervisor of any co-worker or any co-worker's family member, who has an interest in a business entity, seeking to or doing business with Ameren or any of its affiliated companies.
- ☐ I do not hold public office or I have received ethical guidance from and approval facilitated by the CECO to do so.
- ☐ I do not perform substantially the same work that I perform for Ameren as a consultant through my own business or for another employer.

Describe any exceptions to the foregoing or previous guidance and approvals received:

Co-worker, Officer, or Director Name
