



Ethics & Business Standards

Our Commitment to Integrity

Ethics Helpline (800) 378-8121

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OUR GUIDING PRINCIPLES

We at Cleco provide a critical product and service to our customers. The following principles will guide our actions as we fulfill our responsibilities to our customers, our employees, our communities and our stockholders:

- I. Our first responsibility is to our customers, and we commit to:
 - a. a reliable product and excellent service at fair, competitive prices;
 - b. respectful and courteous treatment at all times;
 - c. a flexible attitude, focused on finding solutions to their problems in a timely manner; and
 - d. Safe, reliable operation of the electric system.

- II. We are responsible to our fellow employees, and commit to:
 - a. a clean, safe working environment;
 - b. respect for, and appreciation of, each individual;
 - c. compensation that is fair and recognizes individual contributions;
 - d. leaders who keep their promises and follow through on commitments;
 - e. encouragement and opportunity to make suggestions and voice concerns;
 - f. accountability for performing our jobs to the best of our ability every day;
 - g. opportunities for development and advancement based on talent and merit; and
 - h. a work environment that is inclusive, values ideas from any source, and promotes working cooperatively to get the job done.

- III. Our responsibilities to the communities in which we live, work and serve include:
 - a. protection of the environment;
 - b. involvement by both the corporation and individual employee in civic improvement, charities and community activities; and
 - c. payment of our fair share of taxes.

- IV. Finally, we have a responsibility to our shareholders, to endeavor to provide:
 - a. A superior and consistent return on their investment;
 - b. a business strategy that produces short-term results and ensures the long-term viability of the company;
 - c. compliance with all laws, rules and regulations, and preservation of our corporate reputation through ethical business practices; and
 - d. the wisdom to capitalize on our competitive strengths and the courage to take advantage of new business opportunities that enhance and support our core business.

When we are loyal to the principles outlined above, we believe all stakeholders in our business will ***benefit and prosper.***

CODE OF CONDUCT

These Ethics and Business Standards highlight what Cleco Corporation and its subsidiaries and affiliates believe in and expect regarding employee responsibility and conduct. This booklet reviews laws and regulations governing Cleco, as well as ethical standards that can help guide related business behavior and decision-making. Every employee is expected to comply with all applicable laws and regulations, our guiding principles, company policies and procedures, and to make a personal commitment to ethical behavior.

No publication can possibly identify all the circumstances where you may encounter an ethics challenge or every law or regulation with which Cleco must comply; however there are questions you can ask yourself to guide your business conduct:

- Is it legal?
- Does it comply with rules and guidelines governing the company?
- Is it in sync with our guiding principles?
- Will I be comfortable and guilt-free if I do it?
- Would I do it to my family or friends?
- Would I be perfectly okay with someone doing it to me?
- Would the most ethical person I know do it?

It would be nice if all business decisions had a “bright line” ethical test, but that’s not always the case. When an employee or supervisor isn’t absolutely certain of an answer or interpretation, the issue should at least be reviewed with a person in the next level of supervision. **The best course of action to protect yourself and Cleco is to ask for guidance before acting.** Additionally, the matter can be reviewed with the Ethics Office, the Legal Department, or by calling the Ethics Helpline.

Each of us is responsible for our own conduct. No one, regardless of position, can direct you to engage in or tolerate wrongful acts. Furthermore, management shall not engage in wrongful acts by overriding corporate policies and procedures or established controls. Management intervention of controls may occur for nonrecurring and/or nonstandard transactions or events.

This booklet should be used as a resource and guide; however, the absence of a specific policy, law or regulation covering a particular business situation does not relieve you from your responsibility to exercise good judgment and to behave ethically.

NOTE: NOTHING IN THIS BOOKLET SHOULD BE CONSTRUED AS AN EMPLOYMENT CONTRACT. CLECO CORPORATION, ITS SUBSIDIARIES AND AFFILIATES ARE EMPLOYERS-AT-WILL.

OUR RESPONSIBILITIES

As employees of Cleco, we have a responsibility to comply with company policies, directives and procedures, as well as all applicable laws and regulations. Accordingly, we must:

- Learn the company's policies, rules and regulations applicable to our work. (Policies and Procedures are available on the Cleco intranet website.)
- Seek guidance from your supervisor, the Ethics Office, the Legal Department, or other company resources when you have questions.
- Promptly report concerns...
 - you may have about violations of laws, rules or regulations and Cleco policies or procedures;
 - others may have about a possible violation of laws, rules or regulations and Cleco's policies and procedures;
 - about an intention or request to circumvent or ignore a law, rule or regulation or Cleco's policies and procedures.
- Cooperate with investigations into concerns covered by Cleco policies, laws, rules or regulations.
- Lead by example; be a role model for peers.
- Help support a culture that promotes ethical behavior in an atmosphere that encourages us to raise concerns and questions without fear of reprisal.
- Understand that results must be achieved without compromising ethical standards.

Supervisors are responsible for ensuring employees in their area of operation understand their ethical responsibilities, especially as they relate to problems they would likely encounter in their particular jobs. Supervisors are to be receptive to employee inquiries on the subjects of ethics and compliance and should respond quickly to their concerns.

We owe it to ourselves to adhere to the highest standards and exercise our best judgment in making ethical business decisions. In this way we preserve our own integrity, the reputation of our company, and the trust and confidence of the public.

THE ETHICS AND COMPLIANCE PROGRAM

Cleco takes a proactive approach to its legal and ethical issues, over and above just issuing a series of corporate policies. Our ethics and compliance program serves as a comprehensive plan to prevent and detect violations of laws and regulations. Just as importantly, it serves to facilitate a common understanding of business ethics and aids in the communication and training around these issues.

Cleco's Ethics Office bears the responsibility of overseeing the design and implementation of the ethics and compliance program and ensuring it is effective.

When an employee contacts the Ethics Office directly with a question about company policy, rules or regulations, the Legal Department will assist by interpreting our policy and will consult with functional experts to ensure the employee has as much information as possible to make an informed decision. When an allegation of wrongdoing is made, the Legal Department will coordinate an investigation, when necessary, to gather all relevant facts and will determine the best course of action. If disciplinary action becomes necessary, the Legal Department will help to ensure that it is administered in a fair and consistent manner.

Whether employees are seeking guidance or reporting an allegation of misconduct, contacts regarding ethical issues will be held in the strictest confidence possible. Employees may report concerns anonymously, although providing identification will help to facilitate resolution of concerns. Instances may occur where it is necessary for appropriate company personnel to act on the information reported even if the person reporting the information has requested that no action be taken. However, the confidentiality of the person reporting the concern will still remain a priority.

The Ethics Helpline is outsourced to an independent third-party contractor and is answered 24 hours a day, 7 days a week. Callers can remain anonymous.

ETHICS AND COMPLIANCE CONTACTS

Getting Answers to Your Questions or Reporting a Concern

When you have a question, or need to report misconduct or any related concern, you may do so knowing that the company strictly prohibits reprisal of any kind, and any instances of retaliation or suspected retaliation should be reported immediately to the Senior Vice President, Corporate Services.

There are several resources to help you address your concerns. Here are just a few:

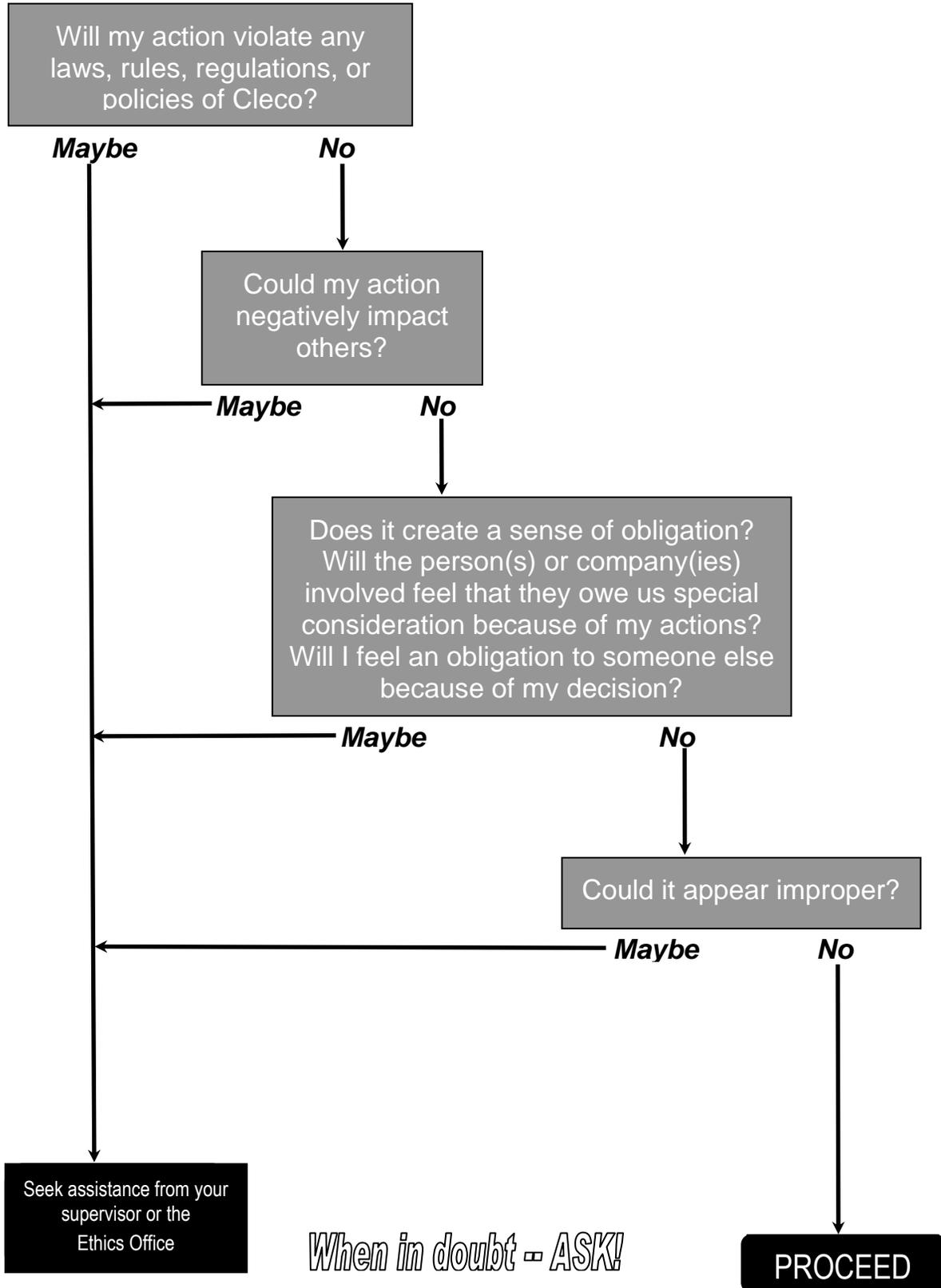
- Ethics and Business Standards Booklet
- Corporate Policies and Procedures
- Your Supervisor
- The General Counsel and Director of Regulatory Compliance, Wade Hoefling: 318-484-7701
- The Controller and Chief Accounting Officer, Terry Taylor: 318-484-7591
- The Ethics Helpline: 800-378-8121 (outsourced to an independent third-party contractor and answered 24/7)

Employees are encouraged to communicate ethical and business practice concerns to their own or any supervisor or to the Ethics Office.



Encouragement and opportunity to make suggestions and voice concerns.

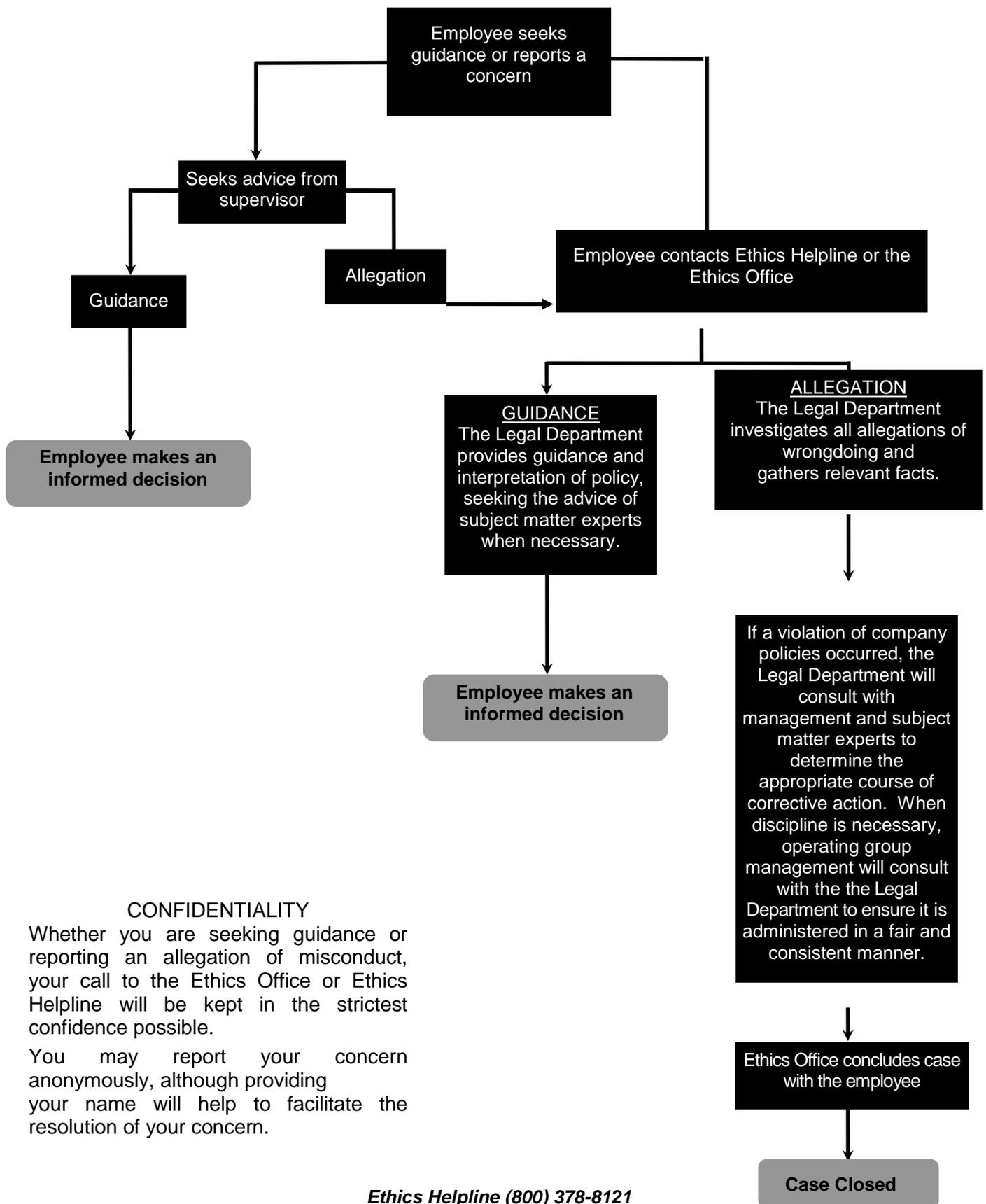
ETHICS QUICK TEST



When in doubt - ASK!

Ethics Helpline (800) 378-8121

RESOLVING YOUR CONCERNS – THE PROCESS



CONFIDENTIALITY

Whether you are seeking guidance or reporting an allegation of misconduct, your call to the Ethics Office or Ethics Helpline will be kept in the strictest confidence possible.

You may report your concern anonymously, although providing your name will help to facilitate the resolution of your concern.

Ethics Helpline (800) 378-8121

PERSONAL CONDUCT GUIDELINES

CONFLICT OF INTEREST

A conflict of interest is any circumstance that could cast doubt on an employee's ability to act with total objectivity with regard to Cleco's interests. Neither you nor your immediate family, nor the immediate family of your spouse may derive any improper benefit from your position as a Cleco employee.

Employees have the duty to avoid financial, business or other relationships which might cause a conflict of interest with the performance of their duties at Cleco. Employees should conduct themselves in a manner that avoids even the appearance of conflict between their personal interests and those of Cleco. Potential conflicts can involve customers, suppliers, present or prospective employees, shareholders or members of the communities in which we live and work.

Everyone has the right to be employed outside our company and to have outside financial and personal interests. However, participating in outside activities that affect, or have the appearance of affecting our independence or judgment are not in the best interest of our company. Please also refer to the section in this booklet entitled "Outside Employment."

If you or your family members are involved with an individual, organization or company that does business with our company, or if you own a financial interest in the business of any customer, supplier or competitor, discuss the details with your supervisor and inform the General Manager of Internal Audit as soon as possible. A conflict of interest or the appearance of one may exist. Every six months Internal Audit conducts a survey of all employees to ensure compliance with this policy.

 **Related Policies:** Conflict of Interest Policy; Transactions with Certain Individuals or Businesses Policy; Nepotism Policy

Q: A customer has offered me an expensive item at cost. The offer was made to thank me for helping the customer solve a difficult problem. Can I buy the item at cost?

A: No. By accepting such a benefit, it creates a conflict of interest.



Compliance with all laws, rules, and regulations, and preservation of our corporate reputation through ethical business practices.

EMPLOYEE ASSISTANCE PROGRAM

Personal problems can affect work performance. Both management and the Human Resources staff are available to help you. In addition, an Employee Assistance Program (EAP) is available to all employees and family members seeking help with financial, legal, domestic, physical, emotional, alcohol or drug use problems. These services are provided by an outside counseling agency, are confidential, and are provided on a self-referral and voluntary basis. Arrangements can be made by calling 1-800-245-1150. The company encourages the use of these services.



Related Policy: Employee Assistance Program (EAP) Policy

Q: Will management be notified if I or one of my family members contacts the EAP?

A: No, your contact with the EAP is strictly confidential. The only information provided by the EAP to Cleco is purely statistical, and contains no names or personal information.

NOTE: In situations where participation in the EAP is a condition of continued employment, the Company will monitor participation in the EAP.

FAMILY RELATIONSHIPS

We live and work primarily in small communities, where the possibility of two or more family members working at Cleco is high. However, careful thought must be given prior to hiring, promoting or assigning an employee whose family relationship with supervision could create a conflict of interest. Our “Nepotism Policy” states in part:

- Two or more employees who are close relatives (includes spouse, brothers and sisters, and parent-child relationships by blood, adoption or marriage) may work in the same department but not report to the same supervisor.

- An employee may not work under the supervision of a close relative.



Related Policy: Nepotism Policy

Q: If I am working in a particular department and marry another employee in the department, does one of us have to leave the company?

A: No...unless one of you cannot be transferred AND:

- a. you report to the same supervisor, or
- b. your new spouse is your supervisor, or
- c. you are your new spouse’s supervisor.

HOLDING PUBLIC OFFICE

Our “Political and Electoral Activities” Policy reads in part:

“Cleco operates in wholesale and retail environments. As such, it has special relationships with customers and governmental entities within whose jurisdiction it provides service. Because of the special ties we have with our customers and Cleco’s relationship with governmental entities, we must avoid even the appearance of impropriety. . . . While employees are allowed by law to hold public office, Cleco reserves the right to determine if and when the holding of such office could produce adverse public and/or business relations or impair the employee’s ability to perform his/her job duties satisfactorily.”

 **Related Policies:** Political and Electoral Activities Policy; Conflict of Interest Policy

Q: I have been asked to run for the School Board. Is this allowed?

A: Yes, but you should check with your supervisor before making a commitment to run for office.

OUTSIDE EMPLOYMENT

Employees should not engage in outside employment that has any of the following consequences:

- produces adverse public and/or business relations for Cleco;
- impairs the employee’s ability to perform his or her job duties satisfactorily;
- constitutes employment with a competitor; or
- jeopardizes arms-length relationships with suppliers or customers.

 **Related Policy:** Conflict of Interest Policy

Q: I have been offered part-time employment by another company, for whom I’ll work on weekends. It will not interfere with my job. Is there any problem?

A: No, not if the job doesn’t interfere with your job at Cleco, or lead to any of the other consequences listed above.

PARTICIPATION IN COMMUNITY ACTIVITIES

Community involvement is an important part of our corporate philosophy as a service company. We support worthwhile activities and charities through corporate and employee contributions. We also commit our company resources to assist community causes, educational programs and organizations which produce lasting advantages in our communities.

Employees are encouraged to become involved in civic activities, service and professional organizations. However, we must use good judgment in selecting community activities to ensure that our participation does not interfere with our work performance, reflect unfavorably on our company, or conflict with the company's business interests or competitive position.

 **Related Policies:** Conflict of Interest Policy; Transactions with Certain Individuals or Businesses Policy



Involvement by both the corporation and individual employees in civic improvement, charities and community activities.

USE OF ALCOHOL, ILLEGAL DRUGS AND TOBACCO

We are expected to be fit for duty when reporting to work. In this regard, our company prohibits the possession, use, transfer or sale of illegal and unauthorized drugs, controlled substances, alcoholic beverages and drug-related paraphernalia. This applies to employees, applicants, contractors and visitors while on company property or on company business during working time. Tobacco use is prohibited in company buildings and vehicles. This is a health safeguard for our co-workers.

 **Related Policies and Procedures:** Tobacco-free Workplace Policy; Substance Abuse Policy; Alcoholic Beverages at Company Functions Procedure; Drug and Alcohol Procedures



Accountability for performing our jobs to the best of our ability every day.

OPEN COMMUNICATION AND COOPERATION WITH CO-WORKERS

We are all members of the Cleco team, and our work interconnects on a daily basis. Your actions and those of your immediate work group affect other employees and parts of the company. The open exchange of information and cooperation with coworkers - accepting that we must be compliant with our Affiliate Policies, FERC Compliance Policy, FERC Standards of Conduct Procedure, FERC Affiliate Restrictions Procedure and LPSC orders - is essential to successful operations. Therefore, each of us has the obligation to actively practice open communication and cooperation within the limits placed upon us by our regulation. Within this, we should strive to create an environment that promotes and appreciates a diverse workplace and respects individuals. Holding back information, knowledge or work effort for personal reasons or self-promotion is inappropriate behavior.

The privacy and dignity of Cleco's employees will be respected at all times. The company is committed to providing its employees with a safe work environment that is free from discrimination or harassment of any type.

Additionally, no part of our organization can succeed at the expense of any other part; therefore, it is imperative that we acknowledge, leverage and respectfully support one another's obligations and expertise. Interpersonal issues should ideally be solved between the individuals involved. Failing that, they should be brought to the individuals' supervisor(s) or Human Resources representative for resolution. Poor co-worker relations should not be allowed to undermine the success of any department or the company as a whole.

 **Related Policies and Procedures:** Conduct – Employee Guidelines Policy; Workplace Violence Policy; Anti-Harassment Policy and Anti-Harassment Procedure; Safety Policy; FERC Compliance Policy; FERC Standards of Conduct Procedure; FERC Affiliate Restrictions Procedure; Affiliate Policies and Affiliate Procedures



Respect for and appreciation of each individual.

BUSINESS PRACTICES GUIDELINES

Ethics Helpline (800) 378-8121

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ACCURACY OF COMPANY RECORDS

It is each employee's obligation to maintain information that accurately and truthfully reflects all Cleco's business transactions.

- All information must be reported accurately and honestly. Altering or destroying data in an attempt to produce false or misleading records or reports is strictly prohibited. Examples of records include:
 - expense reports,
 - P-card statements,
 - time sheets,
 - medical claim forms,
 - reports to regulatory agencies,
 - reports of customer contacts, and
 - personnel reviews.
- Employees are expected to adhere to administrative and accounting control procedures. All business and financial transactions must be reported in accordance with generally accepted accounting principles (GAAP) and with Cleco's control procedures. No employee should misrepresent facts or falsify records. Such behavior will not be tolerated and will result in disciplinary action up to and including termination. Further, management shall not engage in wrongful acts by overriding internal controls over financial reporting. Management intervention of internal controls over financial reporting may occur for nonrecurring and/or nonstandard transactions or events.
- Cleco must adhere to records retention policies established by law or through corporate or departmental policy. Effective records management means retaining only information that is required *and disposing of records and copies that no longer meet any compliance or business requirements, including drafts of documents that have been finalized.*

 **Related Policies and Procedures:** Corporate Records Management Policy;
FERC Compliance Policy

Q: Does my supervisor have the authority to make me change records or accounts that accurately reflect the facts?

A: No. Every employee must ensure that, in the transactions they conduct or support, all records are accurate and proper.



Payment of our fair share of taxes.

CONFIDENTIAL INFORMATION

Information is freely exchanged and widely shared in our company. This is a key element of our corporate culture. However, certain information about our company, affiliates, suppliers, customers and competitors must be restricted and treated as confidential out of respect for personal privacy, by agreement with third parties, or by law. In addition, we must be careful to comply with all laws, rules, regulations and policies governing affiliate relations and the sharing of market information.

Any information that is used in the company's business which is not generally known to the public, the disclosure of which could competitively disadvantage or otherwise harm the company, should be considered confidential. (Note: This does not include information regarding known or suspected illegal or unethical business activity, which should be reported; see page 7).

Confidential information, whether verbal, written or stored on electronic media, is the sole property of Cleco and/or its affiliates. Confidential information includes, but is not limited to: trade secrets, business plans and proposals, sales forecasts, sales and marketing strategies, client and customer lists and account information, pricing and pricing strategies, construction plans, employee personnel records, vendor/supplier data, new business leads and specific areas of research and development. Such information will be released to authorized persons and only on a "need to know" basis.

Employees may not use, for their personal interest or benefit or for the benefit of any other person, information which is confidential or proprietary. These obligations and responsibilities continue in effect while you are an employee and after your employment ends for any reason. In addition, if you receive confidential information from a previous employer or from an affiliate, you have an obligation to avoid disclosing it to other Cleco affiliates or employees.

 **Related Policies and Procedures:** Confidential Information Policy; Affiliate Policies; Acceptable Use of Office Equipment and Information Technology Resources Policy; Information Security Policy; FERC Compliance Policy

Q: How can I determine if a document is considered "confidential" or "proprietary" if it is not marked that way?

A: First, if possible, ask the person who generated the information. If he/she is not available, ask your supervisor to review the document, or contact Cleco's legal department before you use the document.

EMPLOYEE EXPENSES

Business-related expenses will be reimbursed by Cleco and its affiliates to the extent they are **reasonable and necessary**. We are obligated to ensure that all expenses we incur on behalf of our company are essential to perform our jobs. Reimbursement is made for out-of-pocket expenses only after Employee Expense Reports, including required receipts, are submitted for payment and approved by a manager or supervisor. Although the manager or supervisor has “final review” of expense reports and related documentation before payment of expenses, it is the responsibility of each employee, as well as the approver, to ensure that there is no appearance or occurrence of extravagant and/or unsupported expenditures.

Company credit cards issued to employees, as well as advances for expenses, shall be used for company business only. Travel expenses are a significant cost of conducting business. When attending business-related meetings, conferences and seminars outside the company, we are required to obtain prior approval from our supervisors. We should select the mode of transportation most economical to the company, consistent with time requirements and accepted business practices. Air travel should be limited to coach class and coordinated in accordance with the Company’s Travel Arrangements Procedure.

During emergency conditions, such as storm restoration, normal controls are relaxed in favor of flexibility to accomplish the highest priority jobs. As such, activities and expenditures may extend beyond normal levels. In submitting expense reports under such conditions, employees must exercise sound judgment regarding both time reporting and expenses incurred for items such as fuel, drinks, food and other supplies. When the facts indicate that an employee acted for personal gain, appropriate disciplinary action will be taken.

Further, Section 402 of the Sarbanes-Oxley Act of 2002 generally prohibits a public company from extending or maintaining credit, or arranging for the extension of credit, in the form of a personal loan to its directors or executive officers. The above referenced areas of credit cards and travel advances, among other things, are not considered personal loans under Section 402. This notwithstanding, the Company and its executive employees and directors shall maintain full compliance at all times with Section 402 as it relates to personal loans and extensions of credit.

 **Related Policies and Procedures:** Expenditure Approval (Capital and Non-Capital) and Contract Signing Authority Policy; Employee Expense Reports Procedure; Floral and Other Gifts Procedure; Retirement Parties and Gifts Procedure; Travel Arrangements Procedure; Employee Credit Card (Pcard) Transactions Procedure

GIFTS, GRATUITIES, INVITATIONS AND ENTERTAINMENT

Whether to offer, accept or decline gifts, gratuities, or invitations can involve “gray areas.” Offering and accepting reasonable hospitality may be appropriate in certain cases; however, we have to use consistent guidelines to make good decisions.

Inexpensive gifts, favors and entertainment presented as a common business courtesy may be accepted, but only if your acceptance will not cause or appear to cause preferential treatment or an obligation to the giver. Meals provided by an existing or potential customer, supplier or competitor may be accepted if they have a business purpose, and are not extravagant or frequent. If you receive a gift and are not sure if you should accept it, the best course is to return it with a note explaining company policy or donate it to a charitable organization if the gift is perishable.

Limited business entertainment based on providing customers with additional knowledge of our company adds to the value we offer customers. Excessive gifts and entertainment detract from that value. Limited business-related entertainment, favors or gifts of nominal value may be extended to customers if legal, not embarrassing should it be disclosed publicly, has supervisory approval and abides by the customers’ or Cleco’s policies.

There are additional and extensive rules applying to entertainment and gifts when federal or state officials/employees are involved. Generally those rules are as follows:

Cleco will comply with and abide by the Louisiana Code of Governmental Ethics. While the Code of Ethics permits Cleco to entertain public servants or staff for legitimate business purposes, the following rules will apply:

- No Cleco employee may offer a public servant (defined as a public employee or an elected official) anything of economic value with the exception of promotional items with the Cleco logo having no substantial resale value. This prohibition specifically includes food or drink, tickets for professional, semi-professional or collegiate sporting events or concerts, and invitations to golf outings or fishing/hunting trips.
- An elected official is any person holding an office in a governmental entity which is filled by vote of the electorate. It also includes any person appointed to fill a vacancy in such offices. A public employee means anyone, whether compensated or not, who is:
 - (1) an administrative officer or official of a governmental entity who is not filling an elective office;
 - (2) appointed by any elected official when acting in an official capacity, and the appointment is to a post or position wherein the appointee is to serve the governmental entity or an agency thereof, either as a member of an agency, or as an employee thereof;

- (3) Engaged in the performance of a governmental function; or
 - (4) Under the supervision or authority of an elected official or another employee of the governmental entity.
- The Louisiana Code of Governmental Ethics has stringent rules that require anyone acting as a lobbyist to register and file reports. A “lobbyist” is defined as someone who communicates with an executive or legislative branch official to encourage action and who spends money for food, drink, or refreshment for the official, or the spouse or minor child of the official. With regard to local officials (i.e., a mayor or alderman), anyone who spends in excess of \$500 in the aggregate in a calendar year for food, drink, or refreshment for any official or the spouse or minor child of any official, becomes a lobbyist.
 - Other than employees who are already lobbyists, no Cleco employee should take any action requiring him/her to register as a lobbyist.
 - Flowers or a memorial donation to a charity of the family’s choice may be made in connection with the death of a public servant or his/her immediate family member, if the value of the gift does not exceed \$100.
 - Any requests for political contributions should be referred to the Cleco United Employees Political Action Committee (PAC).

The entertainment rules applying to public servants are complex. Employees who find themselves occasionally or unexpectedly in such a situation with an elected official should attempt to contact the Director, State & Federal Affairs for guidance before making any decisions. Employees having governmental contact responsibilities should be conversant with the state’s rules and are responsible for compliance with those rules at all times.

 **Related Policies and Procedures:** Business Relationships with Public Servants and Staff Policy; Conflict of Interest Policy; Gifts and Entertainment – Acceptance or Donation of

Q: I attended a vendor-sponsored conference along with representatives from 60 other companies. During the conference, there was a drawing for door prizes, and I won a golf bag worth about \$150. May I keep the golf bag?

A: As long as you were not singled out, and acceptance of the bag would not actually or appear to give the vendor influence over you, you can accept the door prize. When in doubt, check with your supervisor or the Ethics Office.

Q: As a token of appreciation, I just received a thirty-minute long distance telephone calling card from a hotel where I frequently stay on business. May I keep the card?

A: The value of the card could probably be considered “nominal”; therefore, it would be within Cleco’s policy to keep the card.

MARKETING, ADVERTISING AND BUSINESS COMMUNICATIONS

The promotion of Cleco's products and services is based on truthfulness. We should be accurate and complete in all of our business communications. Promotional media should be persuasive, but must always be in good taste and in compliance with our ethical standards.

We should always be open and honest when responding to questions from the public. Communications from non-utility affiliates should not lead a customer to believe that the affiliate is the same operating company as the utility, Cleco Power.

Our business communications should be truthful, in good taste, and free from false or exaggerated claims or statements. This includes all correspondence, advertisements, sales and promotional materials, newsletters and news releases, and any other information prepared for internal or external use.

We should not provide any public endorsements or testimonials of products, services or equipment from firms with which we do business, without approval from Corporate Communications. We should not use our company's name or purchasing power inappropriately to obtain personal discounts or rebates.

Our goal is to present a consistent and positive image of Cleco. Prior management approval is required to use our company's name and symbol in conjunction with any political activity, public demonstration or community event.

When using the corporate signature or symbol, keep in mind the following:

- Use the Cleco signature consistently
- Use the correct corporate colors
- Keep the Cleco signature clearly visible
- Use the official timesteps

 See "Basic Corporate Identity Standards" brochure, which is located on Cleco's website.

RELATIONSHIPS WITH COMPETITORS

Cleco will fairly compete for business, based on the value of our products and services, without disparaging competitors. Statements we make about a competitor must be fair, factual and complete.

Cleco has the right and obligation to learn about competitors and understand the markets in which we are involved. Such information, however, should be obtained through openly available sources such as public announcements, trade journals, industry conferences, news articles and advertisements. Employees must never solicit or accept competitive information they believe to be confidential that may have been obtained through improper or questionable means, particularly information related to price, cost or market data.

Cleco employees should not mislead or misrepresent their intended purpose to obtain information about competitors. A Cleco employee formerly employed by a competitor should not disclose information about the competitor that he/she believes to be proprietary or confidential.

In some instances, a competitor may also be a customer or vendor. Cleco employees must avoid requesting competitive information about the company with which they are dealing or releasing information about Cleco that is outside of the scope of the business transaction.

RELATIONSHIPS WITH CUSTOMERS

We deal with external and internal customers, both directly and through affiliate relations. To our external customers, we represent Cleco wherever we go, in what we say and what we do, while away from work as well as while conducting business. Our conduct at work and in public should always reflect positively on our company and ourselves.

We rely on our internal and external customers as much as they rely on us. This interdependence creates an obligation for each of us to develop good working relationships with our customers. When handling an inquiry or problem, put yourself in the customer's position. Make sure the customer is satisfied that you have promptly and adequately addressed his or her need or concern, then follow through and do what was agreed upon.

We must maintain the confidentiality of all proprietary and personal information pertaining to our customers. Access to customer information will be limited to authorized personnel and will be used only for the purpose of conducting company business. Customer information should not be released to any third party without proper authorization from the customer and/or Cleco management.

Q: My neighbor has a house to rent, and has asked me to look at the credit history of one of our customers, as this customer has indicated an interest in renting the house. Is it alright for me to do my neighbor this small favor?

A: No. Any and all information on our customers is strictly confidential, unless authorized for release by the customer or Cleco management.



Respectful and courteous treatment at all times and a flexible attitude focused on finding solutions to problems in a timely manner.

RELATIONSHIPS WITH GOVERNMENT AUTHORITIES

Cleco is governed by the Louisiana Public Service Commission (LPSC), which is constitutionally empowered by Public Service Law in Louisiana, and by the Federal Energy Regulatory Commission (FERC) primarily under the Federal Power Act. Additionally, Cleco's reliability effort is governed by the North American Energy Reliability Commission (NERC).

Public utilities are required to provide safe and reliable service, to charge just and reasonable rates, and to avoid unjust discrimination or unreasonable preferences among its customers. Employees should learn, understand and comply with these requirements via the company's annual regulatory compliance training programs. The regulators can impose significant penalties (up to \$1 million per day per violation) against the company if the laws or regulations are violated or if an enabling order that applies the law is disobeyed. Additionally, in extreme situations of willful violation and/or fraud, the FERC has the authority to take action against individuals. The company cannot overemphasize the importance of every employee embracing full compliance with public utility regulation.

Agreements between Cleco and a government agency may involve special contracting and accounting requirements. Detailed laws and procedures regulate every stage of government contract work; that is, from contract proposal and negotiations to the performance of the contract and charging for the work the company has completed.

If employees are involved in a contested case before the LPSC, FERC or any other regulatory body, they should not engage in any ex parte (private, off-the-record) conversation or communication concerning any substantive issue in the case, with any commissioner, administrative law judge or senior advisory member of the agency staff. Employees who have regular contact with government authorities shall become familiar with and observe any legal or regulatory policy constraints to which government employees are required to adhere.

 **Related Policy:** Business Relationships with Public Servants and Staff Policy

RELATIONSHIPS WITH THE NEWS MEDIA

Cleco Corporation regards news media as an essential information pipeline to the public. We recognize the importance of media relations and the need to communicate effectively in all dealings with its representatives. By effective, we mean honest, accurate, timely and consistent with company policies and positions. Effective media relations are one part of a specialized communications strategy designed to move people toward an awareness of our company's objectives and positions.

The public -- which includes our employees, customers and shareholders, governmental and regulatory officials, vendors and business allies, members of our communities and our competitors -- forms many of its opinions about Cleco Corporation and its affiliates by reading newspapers or news Internet sites, listening to radio or watching television. Public understanding, goodwill and favorable attitudes toward Cleco are particularly important in an increasingly competitive era.

As a general rule, it is best to refer questions from the media to our Corporate Communications Department. They will coordinate the release of information and photographs, as well as arrange public presentations on company matters. Cleco will establish and maintain open and cooperative relationships with the news media consistent with the interests of customers, shareholders and employees.

 **Related Policy:** Media Contact and Media Relations Policy

Q: We've experienced an outage in our area, and the local media is calling our service office for information and interviews. What should we do?

A: Refer any media inquiries to Corporate Communications. They will contact the media person, and make arrangements to provide whatever information is appropriate.

RELATIONSHIPS WITH VENDORS

Our suppliers and vendors contribute to the success of our company. We value the business relationships we have established with our vendors and seek to develop additional reliable sources of products and services.

We purchase our goods and services from qualified suppliers on the basis of price, quality, service and delivery. We use equitable bidding practices based on fairness and impartiality and safeguard supplier pricing proposals as sensitive business information. We give preference to local suppliers and small, disadvantaged businesses when all other considerations are substantially equal.

We should maintain the highest standards of integrity in all procurement activities and avoid conduct that could create the appearance of a conflict of interest. We accept no material favors or gifts from our suppliers and incur no obligations to them, other than payment for the products and services they provide. We do not attempt to influence procurement decisions in return for personal compensation or favorable treatment from these suppliers.

We maintain, in confidence, sensitive information such as pricing submitted to our company in connection with the purchasing of goods and services, to avoid giving or removing any competitive advantage to our suppliers.

 **Related Policies and Procedures:** Conflict of Interest Policy; Gifts and Entertainment – Acceptance or Donation of Policy; Purchasing Policy; Purchasing Procedure

RELATIONSHIPS WITH SHAREHOLDERS & INVESTORS

Our shareholders and investors show their confidence by investing in our company. We value this trust and strive to retain their continued support and loyalty.

As employees, we are accountable to shareholders and investors. We safeguard their investment and enhance its value by ensuring honest, competitive, and efficient operation and management of our company. We encourage an open dialogue with our shareholders and investors along with the accurate and timely communication of good, as well as bad, news. We will not increase our investors' expectations by falsely enhancing financial results, or in any other way intentionally mislead them.



We endeavor to provide a superior and consistent return on (our shareholders') investment.

RELATIONSHIPS WITH AUDITORS

Audits are a critical component of our compliance monitoring processes. Employees maintain positive and professional working relationships with Cleco's Internal Audit department, the Company's external auditors, and any other entities authorized to conduct audits. We fully cooperate with these groups and timely submit complete, accurate, and factual responses to requests for information through interviews, formal data requests or other means.

USE OF COMPANY ASSETS

Employees are responsible for the proper safeguarding and authorized use of any company asset in carrying out their job duties and assignments. These assets are the sole property of Cleco. Company assets include physical assets such as cash deposits, inventory, buildings, vehicles, office equipment, telephones, tools, materials, supplies, computers and similar assets, as well as intangible assets such as computer software and databases, proprietary information and intellectual property, such as patents, copyrights and trademarks. Also included are the assets of others for which the company is responsible, such as equipment, proprietary information and reports, or computer programs that are leased or loaned to the company.

We should keep our company's property in good operating condition by treating it as if it were our own. Non-business use of tools and equipment requires supervisory approval. Written authorization from management is necessary before company property can be disposed of, destroyed, sold, loaned or donated.

 **Related Policies and Procedures:** Transportation Policy; Disposition of Surplus Materials and Equipment Procedure

Q: I am assigned a company vehicle and am allowed to take it home after work. On my personal time, I often have family activities to attend to that require the use of a vehicle. Can I use the company car?

A: No. The car can only be used for company business, including coming to and leaving from the work site. It is against company policy to allow family members to ride in company vehicles.

Q: I have a company cell phone. I also sell real estate as a side business. Can I use the cell phone for conducting my business and then reimburse the company for the calls?

A: No. Cell phones should be used only for Cleco business-related matters. Although there may be situations where occasional personal use of the company cell phone is permitted, the cell phones may never be used during the conduct of someone's outside employment or business venture.

USE OF COMMUNICATIONS SYSTEMS AND ELECTRONIC MEDIA

Cleco provides its employees with the technology necessary to perform their job responsibilities. The company reserves the broadest rights to ensure that all electronic communication systems, including e-mail, voice mail, the internet and electronically created or stored data, is used in a productive and efficient manner.

Computer hardware, software and electronically stored data must be adequately safeguarded against damage, loss, alteration, theft or unauthorized access. Each of us is responsible for the protection and confidentiality of our computer passwords and other personal system and network access and information. Employees should not share their passwords with anyone.

Communications made through use of company equipment and applications are not employees' personal property and are not private. By making use of company computer and communication assets, employees are consenting to the monitoring of such use by authorized company representatives at their discretion. In addition, all messages must be appropriate for a business environment and should comply with all applicable policies, including our policy against the presence of offensive material on our computer systems, whether via e-mail or the internet.

 **Related Policies and Procedures:** Acceptable Use of Office Equipment and Information Technology Resources Policy; Acquisition, Installation, and Support of Network-Attached and Stand-Alone Computing Hardware and Software Procedure

Q: I received an e-mail chain letter, instructing me to send it on to ten other people. Is it appropriate for me to pass it on?

A: It is not permissible to forward chain letters to others, as they use an inordinate amount of IT resources. Delete the message.

Q: I've been told we have a "two strike" policy for offensive material via e-mail or on the internet. What does this mean?

A: Any material you receive at the company via e-mail that could be considered offensive by anyone should be deleted immediately. Do not keep it or forward it to another employee or anyone else. If you are conducting legitimate company business using the internet and inadvertently find yourself on a site that could be considered offensive, log off and immediately call IT so that they can record the event. Failure to follow through on these practices would constitute a recordable event or "strike," at a minimum, and depending upon the circumstances, could result in immediate dismissal.

LAWS AND REGULATIONS

INTRODUCTION

The laws referenced in this section do not reflect a comprehensive list. As a business, and a largely regulated business in particular, there are numerous laws, rules and regulations to which we are subject, and they are constantly changing. Please remember, should you have any questions, contact your Supervisor, the Ethics Office, or the Legal Department for direction before taking actions.

AFFILIATE RULES AND TRANSACTIONS

Transactions between Cleco affiliates are subject to rules and standards issued by the individual state commissions governing the regulated utility, the FERC and the Securities Exchange Commission (SEC). Employees must comply with all statutes, regulatory rules and orders, and accounting standards as they apply to transactions between affiliates. Affiliate transactions involve the provision, sale, assignment, transfer, or lease of goods, services or other assets between affiliates. There are SEC, FERC, and LPSC regulatory requirements and significant regulatory risks associated with non-compliance. These standards of conduct, codes of conduct, affiliate restrictions and cost allocation requirements are referred to as “affiliate rules.” They exist to ensure that transactions between affiliates are appropriate. They protect against the regulated utility showing favoritism toward its affiliates, sharing certain market and non-public information with affiliates or transferring costs to the regulated utility inappropriately. You should consult Cleco’s Affiliate Policies and Affiliate Procedures, your supervisor, the Controller or the Legal Department for guidance on how the rules apply to your particular situation or if you have any questions or concerns. You can also file an anonymous complaint by calling the FERC Hotline at 1-888-889-8030 or the Cleco Ethics Helpline at 1-800-378-8121.

 **Related Policies and Procedures:** Affiliate Policies; Affiliate Procedures; FERC Compliance Policy FERC Standards of Conduct Procedure; FERC Affiliate Restrictions Procedure

Q: Do these affiliate rules apply to transactions between non-regulated affiliates?

A: Yes. The affiliate rules apply to all Cleco companies.

ANTITRUST

Antitrust laws are designed to preserve and foster fair, honest competition within the free enterprise system. They prohibit unfair practices which restrain trade or monopolize business, such as agreements to restrict competition by fixing prices or by limiting or allocating production, distribution areas or customers.

Refusal to deal: Refusals to deal involve an agreement (oral or written) between competitors not to buy from a supplier or vendor, or an agreement not to sell products or services to a particular customer. Special care must be exercised when you are engaged in industry trade organization activities. Employees involved in a trade organization meeting could be in conflict with the antitrust laws if they engage in discussions that result in either formal or implicit consensus among a group of companies not to purchase some product or service from a particular vendor or to purchase a product or service only under certain terms and conditions. The key is that decisions of this kind must be made by companies independently and not by group consensus.

Price Fixing: Without appropriate regulatory approval, any agreement, understanding or arrangement between competitors to raise, lower, fix or stabilize rates or prices is illegal.

Allocation of Customers or Territories: Under the antitrust laws, it is illegal to make agreements with competitors for the purpose of dividing up service territories in which sales are made or allocating customers, unless appropriate regulatory approval is obtained.

Tying Agreements: Certain arrangements in which a customer is required to purchase unwanted products or services in order to obtain a desired product or service are illegal under antitrust laws.

Antitrust laws are complex, difficult to interpret, and apply to a very broad range of activities. When in doubt you should consult with your management or our legal department for the proper course of action.

Q: What should I do if I'm at a trade organization conference and over dinner people from other companies start talking about "pooling our resources" to force a supplier to give us all a better deal?

A: Make it very clear that you are not interested in doing this, and make an obvious exit from the gathering. This type of conversation could be considered a violation of the antitrust regulations.



Related Policy and Procedure: Purchasing Policy; Purchasing Procedure

FRAUD, BRIBERY AND KICKBACKS

Fraud is the *willful intent to deceive*.

Fraudulent acts of any kind are prohibited. Fraudulent acts include, but are not limited to:

- misappropriation of funds, equipment, supplies, or other assets
- impropriety in handling or reporting financial transactions
- falsification of official records, such as time sheets or expense reports
- profiteering as a result of insider knowledge of company activities
- disclosing confidential and proprietary information to outside parties
- accepting or seeking gifts not allowed by the policy “Gifts and Entertainment - Acceptance or Donation of”
- misuse of company assets, such as inventory, equipment, vehicles, telephones, mail systems, or computers.

Each employee is responsible for the detection and prevention of fraud, misappropriations, and/or other irregularities. Incidents must be immediately reported to Internal Audit, the Ethics Helpline (800-378-8121) or to the Ethics Office.

Employees are prohibited from offering or accepting, directly or indirectly, bribes or kickbacks to influence a decision or to obtain any special treatment for Cleco or themselves personally.



Compliance with all laws, rules and regulations, and preservation of our corporate reputation through ethical business practices.

COMPETITIVE INTELLIGENCE

It is a legitimate business practice for Cleco to be interested in information concerning competitors, including competitive prices. Where such information has been acquired in the proper manner (e.g., public sources such as advertisements or published articles, industry gatherings such as conferences and trade shows, and industry surveys by reputable consultants) it is proper to disseminate it within Cleco for use in making business decisions.

Employees should not obtain proprietary competitive information through improper means. For example, it would not be proper to receive information from a third party that was illegally or improperly acquired, or from present or former employees who were not authorized to disclose it. It would also be considered both unethical and unlawful to gain information through misrepresentation or coercion, or by engaging in industrial espionage or theft of proprietary information.

Q: What is considered “proprietary” information?

A: In general, it is any information that is not readily available to the general public, such as trade secrets, business plans or proposals, sales forecasts, sales and marketing strategies, and customer lists and account information.

COPYRIGHT

A copyright is a legal right which protects the copyright holder’s creative work from unauthorized use, reproduction or copying. Examples include software programs, professional publications, books, and presentation materials.

Employees are prohibited from illegally reproducing or copying copyrighted material without the copyright holder’s prior authorization or permission, as required by the United States Copyright Act.

One way to avoid violating copyright law is to paraphrase material or use indirect quotes. You should, however, always give credit to the source and refrain from extensive use of paraphrasing or indirect quotes. The copyright law itself, under the fair use provision, protects the users’ right to copy copyrighted material. The copying of copyrighted work for training or research, among other purposes, is not an infringement of copyright protection.

Remember, the internet is just another method of publication. Original wording appearing on a web page cannot be reproduced without permission.

Cleco has obtained a license from Copyright Clearance Center to copy material from many common business publications and utility trade magazines. To find out if Cleco has obtained the rights to copy certain materials, employees can go to www.copyright.com and search for the publication or contact the Records Center.

Cleco regularly licenses computer software from a variety of outside companies. Cleco does not own this software or its related documentation and does not have the right to reproduce it unless authorized by the owner of the software. Employees are responsible for using licensed software in accordance with the terms of the underlying license agreement, and may not copy for personal or home use, unless expressly authorized by the terms of the license agreement and their supervisor(s).

External parties, such as vendors, consultants, and customers may submit proprietary information to Cleco. Such information may include bids, product specifications, and strategic plans. This information should remain confidential and not be disclosed except as authorized by the external party or as required by applicable laws and regulations.

 **Related Policy and Procedure:** Acceptable Use of Office Equipment and Information Technology Resources Policy; Acquisition, Installation and Support of Network-Attached and Stand-Along Computing Hardware and Software Procedure

ENVIRONMENTAL PROTECTION

We have an effect on the environment when providing energy services. As individuals and as a company, we recognize this and seek a balance between fulfilling obligations to our customers and the environment.

We reach this balance by complying with all applicable environmental laws and regulations, minimizing waste, stressing efficiency and recycling, and using safeguards to prevent environmental damage that might result from our operations. We must respond quickly and responsibly to all environmental events related to our operations. We will monitor our activities to ensure our compliance with these environmental standards.

We take our commitment to environmental health and safety seriously and communicate this commitment to our customers, suppliers and contractors through environmental education and conservation programs. We work with regulatory agencies and others to develop and support equitable laws and regulations to protect the environment. We ensure that our employees receive adequate training and are aware of the importance of their role in protecting our environment, and we design, construct and operate our facilities so that they meet or exceed current environmental requirements.

 **Related Policy:** Environmental Compliance Policy

Q: I saw someone dumping chemical waste into a regular trash container. What should I do?

A: Report it immediately. Environmental laws are complex, but you don't need to understand every detail before you report an environmental concern. If you are unsure, report it immediately to your supervisor, or the company's environmental department.



Protection of the environment.

HARASSMENT AND DISCRIMINATION

Cleco is committed to maintaining a work environment for all of its employees that is free of harassment or discrimination of any kind. Respect is the cornerstone of creating a harassment-free and discrimination-free work environment where employees can contribute to their fullest potential.

We will recruit, hire, train, delegate work responsibilities and promote persons in all jobs objectively without regard to race, gender, color, sexual orientation, national origin, age, religion, disability or veteran status.

Harassment is a form of discrimination that has the purpose or effect of unreasonably interfering with an individual's work performance, creating a hostile or offensive work environment, or otherwise adversely affecting an individual's employment opportunities. Harassment may include, but is not limited to, using epithets, slurs, stereotyping, intimidating or offensive conduct; displaying or distributing offensive materials; and making offensive jokes and comments.

Cleco does not tolerate harassment or discrimination and will take prompt corrective action if violations occur. Complaints will be kept confidential to the maximum extent possible and retaliation is strictly prohibited. Employees must report harassment or discrimination to either their supervisor, Human Resources representative, the Ethics Office, the Cleco Ethics Helpline (800-378-8121), or any other management personnel.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, or other things of a sexually offensive nature such as posters, calendars, or other sexually suggestive written, recorded, or electronic messages, offensive comments, jokes, innuendoes, other sexually oriented statements, or all other verbal or physical conduct where:

- the conduct either implicitly or explicitly is a term or condition of employment, or
- is used as the basis for decisions affecting an individual's employment, or
- unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

 **Related Policies and Procedures:** Anti-Harassment Policy; Equal Employment Opportunity Policy; Conduct – Employee Guidelines Policy; Open Door Policy; Workplace Violence Policy; Anti-Harassment Procedure

Q: One of my co-workers has a habit of telling offensive jokes, and it bothers everyone in our group. What should I do?

A: Ideally, you can discuss this with the person telling the jokes; however, if you can't or don't want to do so, you should discuss the concern with your supervisor, your Human Resources Representative, the Ethics Office, or you can contact the Ethics Helpline (800-378-8121).

Q: If I report harassment without giving my name, will anything be done about it?

A: Yes, every report will be investigated regardless of whether you give your name or choose to report anonymously.



A work environment that is inclusive, values ideas from any source, and promotes working cooperatively to get the job done; opportunities for development and advancement based on talent and merit.

INSIDER TRADING

The Securities Exchange Act of 1934 prohibits insider trading. This is defined as trading in a company's securities based on information about the company that is material (could affect the price of company stock, positively or negatively) and has not been publicly disclosed (by press release, financial report, etc.). Some examples are financial projections or results, mergers or acquisitions, and changes in dividend policies of a company. In addition, insider trading applies to any company about which confidential information is acquired, e.g., employees who receive confidential information from customers or partners must also refrain from trading or tipping based on such information.

Insider trading violations also include providing such information to others ("tipping") and securities trading by the person "tipped." This includes family members and third parties acting on your behalf. Three basic rules to follow are: (1) don't buy or sell securities while in possession of material, non-public information; (2) don't pass such information on to others who may buy or sell securities; and (3) if such information has been publicly disclosed, allow sufficient time for the information to be disseminated and absorbed by the marketplace before acting on it or passing that information to others. If you have any questions, contact Cleco's Legal Department.



Related Policy: Insider Trading Policy

Q: Can I buy Cleco stock through my 401(k) plan if I have material, non-public information about the company?

A: If you are already buying Cleco stock through your 401(k) plan on an ongoing basis, you don't have to change your investment election to stop buying that stock when you receive the information. However, you should not make changes in your 401(k) relating to Cleco stock (buy or sell) as a result of receiving that kind of information.

INTELLECTUAL PROPERTY

Inventions and creative works which you develop in the course of your job, and in certain cases after you leave the company, are the sole property of the company. You are responsible for helping to ensure that Cleco receives the maximum benefit from these innovations and developments. These responsibilities include advising Cleco of any inventions or creative works you develop and assisting Cleco in obtaining legal protection for them. If you have any questions, please contact our Legal Department.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

We are encouraged by our company to participate in political activities by being well informed, by exercising our privilege to vote and by supporting candidates of our choice.

By operating in a regulated environment, Cleco has a special relationship with customers and governmental entities within whose jurisdiction we provide service. Because of this, we must avoid even the appearance of impropriety. Participation in political activities that affect, or have the appearance of affecting, our judgment, actions, or job performance at Cleco, or our company's name should be avoided.

Federal and state laws prohibit or restrict payments or other considerations to government officials to influence decisions. Similarly, our company does not reimburse us, directly or indirectly, for contributions of money, materials, services or personal time given to political campaigns.

Employees are, of course, free to campaign for and support candidates of their choice, but should never refer to Cleco, or any affiliates, as endorsing or supporting any particular political candidate. Employees must avoid making statements or taking actions which give even the appearance that they are speaking for or acting on behalf of the Company.

Cleco employees have organized a political action committee open to salaried, exempt employees and governed by its members. Members pool their personal contributions to support candidates with responsible positions on issues affecting our company and customers.

It is important that we exercise good judgment in all interactions with government officials and employees. Business should be conducted in a manner that will not subject our company, or any public official, to embarrassment if publicly disclosed.



Related Policy: Political and Electoral Activities Policy

SAFETY AND HEALTH

The well-being of our employees is a high priority. We have a strong commitment to provide a healthy and safe workplace to all employees. Our goal is to maintain an environment free from hazards, harassment, abusive behavior and the effects of drug and alcohol abuse. We strive to prevent problems in our work environment or to resolve problems before they require corrective measures.

Our company provides equipment and training necessary to attain a high level of safety for employees, customers, and the public, and we are expected to report any unsafe or hazardous conditions.

Cleco will abide by all applicable safety and health laws. Employees are expected, through training and personal accountability, to develop and maintain safety awareness on the job.

 **Related Policies and Procedures:** Safety Policy; Anti-Harassment Policy; Conduct – Employee Guidelines Policy; Workplace Violence Policy; Anti-Harassment Procedure

Q: How do I know when a working condition is not safe?

A: Common sense, in conjunction with your specific job training, is often the best guide. If you believe a condition is not safe, don't take a chance. Report the potential problem to your supervisor or the Safety Department immediately.

Q: The Company's safety requirements slow me down. Do I really have to follow every one of them?

A: Yes. Each safety requirement is designed to reduce or eliminate a specific risk. All employees have a right to a safe workplace, but it takes everyone's cooperation with adhering to safety procedures.



A clean, safe working environment.

Commitment to Integrity

Confirmation

I recognize Cleco Corporation's strong commitment to integrity and ethical business conduct and the efforts of all my fellow employees to meet the standards outlined in "Our Guiding Principles" and in "Cleco Ethics and Business Standards – Our Commitment to Integrity."

I agree with the importance of the guidelines presented in this document, recognize my responsibility to observe and follow these guidelines, and pledge to conduct myself accordingly. I recognize that failure to do so may result in disciplinary action up to and including termination. Moreover, except for instances I have already reported to my supervisor or other Cleco Management, I am not aware of conduct by any Cleco employees that may be considered a violation of any of the Standards set forth in these guidelines.

Signature: _____

Printed Name: _____

Employee No.: _____

Date: _____

Contact numbers for
Ethics and Compliance Office

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