



Living Spire

The Code
of Conduct
that guides us

spire 



Hi Spire team,

Whether you're just starting at Spire, or are a long-time employee reviewing the Code of Conduct again, in the pages ahead, you'll learn so much about the company you're a part of.

You'll learn that everything we do and every decision we make starts with the mission that drives us, so it's only fitting that we begin our Code of Conduct with those words.

You'll learn that safety, integrity and inclusion are our values and a fundamental part of who we are.

You'll also learn that we talk a lot about "living Spire" and what that looks like. We even have four Living Spire Behaviors that are tied to everyone's performance review—including mine.

We Collaborate

We reach across boundaries to connect with each other and deliver on our promises. We put teamwork first, knowing that our collective energy makes us stronger.

We Care

We create good memories by treating people how we want to be treated: We are inclusive, respectful and kind. We actively create a caring culture that feels like a handshake at the front door.

We Advance

We are active learners who never stop looking for ways to innovate and improve ourselves, and our company. We embrace ongoing development and process improvement with passion and tenacity.

We Have Perspective

We strive to gain additional perspective about Spire's business and the ever-changing energy industry. We know that every employee plays an important role in Spire's success, and we give our best to better understand how to help move the company forward.

And while these remind us that *how* we work is as important as the work itself, Living Spire extends beyond these four behaviors.

Living Spire is knowing our mission and bringing it to life every day.

Living Spire is honoring our values and always keeping safety, integrity and inclusion in mind.

Living Spire is reading the Code of Conduct, understanding it and using it as a guide.

So read through this carefully, and soak in everything you're learning about Spire. Then, go and *live Spire* every day.

Stay safe,

A handwritten signature in black ink, reading "Suzanne Sitherwood". The signature is fluid and cursive, with the first name being more prominent.

Suzanne Sitherwood, CEO

Table of contents

| | |
|--|-----------|
| Our mission | 5 |
| Our values | 5 |
| Working responsibly..... | 6 |
| Understand your responsibilities | 6 |
| Meet FERC requirements and obligations..... | 7 |
| Lead by example..... | 7 |
| Treat each other with respect | 8 |
| Creating a culture of inclusion | 8 |
| Report harassment | 9 |
| Pay in accordance with laws and regulations | 9 |
| Speak up | 10 |
| Reaching out..... | 10 |
| Stay safe | 11 |
| Abide by drug and alcohol policies..... | 11 |
| Staying safe and valuing others | 11 |
| Respect employee privacy..... | 13 |
| Keep company information confidential | 13 |
| Protecting information and assets | 13 |
| Protect Spire's assets | 14 |
| Keep customer and third-party information safe | 14 |
| Protect intellectual property | 14 |
| Use electronic communications responsibly | 14 |
| Manage records properly..... | 15 |
| Maintain accurate records | 15 |
| Promote fair competition..... | 16 |
| Be honest in advertising and marketing..... | 16 |

| | |
|---|-----------|
| Operating with integrity..... | 16 |
| Gather competitive information fairly. | 17 |
| Make purchases fairly..... | 17 |
| Stand against corruption and bribery..... | 17 |
| Give and receive gifts sensibly | 17 |
| Exercise caution when working with government customers or contractors | 18 |
| Avoid conflicts of interest | 18 |
| Stay clear of insider trading | 18 |
| Comply with laws regarding regulators..... | 19 |
| Communicate carefully with external parties..... | 19 |
| Live Spire | 20 |
| Serve your community..... | 20 |
| Caring for our communities | 20 |
| Be good stewards of the environment | 21 |
| Follow political contribution laws | 21 |
| Comply with the Code of Conduct..... | 23 |
| Administering the Code of Conduct | 22 |
| Contact us..... | 24 |

Bringing our mission and values to life

Living Spire means delivering on our mission and honoring our values. From how we connect with one another, to how we care for the homes, businesses and communities we serve, our mission and values remind us of who we are and why we strive to get the job done right every day.

Our mission

Answer every challenge, advance every community and enrich every life through the strength of our energy.

Our values

Safety

Whether at a desk or in the field, safety is fundamental at Spire. We strive for exceptional safety, going beyond regulatory standards to achieve our own standard of excellence. Our promise is that we'll do everything we can to keep our co-workers, customers and communities safe.

Inclusion

We celebrate differences, embracing diverse backgrounds, perspectives and families, and we look for common ground with an inclusive spirit. We treat everyone with respect and care, and we champion new insights and ideas.

Integrity

We believe in doing what's right, every time. Keeping that promise is not always easy but, because it's our way of life, we don't stop until we get it right.



Working responsibly

Living Spire means encouraging one another to work with integrity and deliver on every promise we make.

Understand your responsibilities.

Use these questions as a quick guide to determine whether or not you could be violating Spire's Code of Conduct.

- Is this action legal, ethical and in accordance with Spire policies?
- Is this action consistent with our core values?
- Does this action comply with both the spirit and the letter of our Code of Conduct?
- Is this action appropriate?
- Would Spire be embarrassed or compromised if this action were to become known publicly?

If the answer is unclear, always seek guidance.

As a member of the Spire team, this Code of Conduct is your tool to understanding policies, regulations and laws that apply to your work, every day. It's important that you, and every employee, understand the Code of Conduct and what it means to each of us. That's why we periodically ask for written certification, showing that you have read, understood and will honor the Code of Conduct, and that you are not aware of any violations. This certification is your promise to live the Spire Code of Conduct and hold others accountable.

While the Code of Conduct doesn't cover every situation where a violation could occur, it does serve as a tool to help you, whether you're a director, officer, manager, supervisor or are represented by a Union, use your best possible judgment. If you require additional guidance, you should ask your supervisor, Human Resources or Compliance. You can also find the policies and procedures that apply to your situation by following the link on our employee intranet, inSpire.

Meet FERC requirements and obligations.

The Federal Energy Regulatory Commission (FERC) is responsible for regulating interstate transportation of gas as well as wholesale sales of natural gas in interstate commerce. We maintain a comprehensive FERC compliance program to ensure we meet our obligations under the requirements of FERC. The FERC Compliance Plan is available on the intranet, or by contacting Compliance@SpireEnergy.com.

Lead by example.

Leaders and supervisors have a responsibility to honor our values, serving as an example of the behaviors we expect from all employees and promoting the ethical culture we want to sustain.

While leaders have an added responsibility, every employee should honor our mission and values in how they show up for work each day. This means never putting a fellow employee in a position where they're breaking the law or violating Spire's policies. It also means encouraging one another to put ethical behavior above all else.

Q&A:

Who is the Code of Conduct for?

Everyone! All employees, Board members and contractors must honor Spire's Code of Conduct every day.

What is the Code of Conduct designed to help you understand?

Spire's mission, values, policies, regulations and the laws that support them.

Does the Code of Conduct cover every situation where a violation might occur?

No. It is meant as a general guideline. It's always up to you to seek answers if you have specific questions.



Creating a culture of inclusion

Living Spire means celebrating differences, diverse backgrounds and finding value in all that makes us unique. We treat everyone with respect and care.

Treat each other with respect.

Diversity leads to better results, more creative solutions and greater innovation—it's just good business. It's fundamental to who we are to celebrate and encourage each other's unique perspectives, grounded in different backgrounds, cultures and views.

We are an equal opportunity employer, and we do not discriminate against employees or prospective employees on the basis of race, color, religion, national origin, veteran status, disability, identified gender, age, marital status, sexual orientation, gender identity, genetic information or any other protected group status as defined by law. This includes all practices relating to recruiting, hiring, benefits, leaves of absence, training, transfer, promotion, job assignments, work environment, compensation, corrective action and termination.

If you feel your rights have been violated based on what makes you unique, you should immediately report the conduct to your supervisor, another member of your team's management, your Human Resources representative or the Compliance Helpline (see page 24).

Report harassment.

We are committed to providing a comfortable, safe work environment for you to grow and thrive. We do not tolerate harassment of any kind.

If you believe you are being harassed, or if you have witnessed the harassment of a co-worker, customer, or member of the public, it is important that you report it. We will act quickly and investigate your concern, directly addressing the issue with those involved. And, because these claims are sensitive, we will make every effort to keep allegations confidential, to the extent possible.

Pay in accordance with laws and regulations.

We know that truly valuing Spire team members also means paying you in accordance with all policies, regulations and the law. We're committed to following all applicable wage and hour laws and regulations. To help ensure that all the work you do is compensated properly, please know that if you work on an hourly basis, you must report and record time accurately.

Q&A:

What does a culture of inclusion look like?

A diverse mix of perspectives leads to creative solutions that no individual could think of alone.

Who should you call if you want to report an issue?

Your supervisor or another member of supervision, your HR Business Partner or the Compliance Helpline.

Here are some examples of what harassment in the workplace looks like.

- Unwelcome behavior, verbal or physical, that's meant to threaten, intimidate or coerce
- Verbal taunting, including racial and ethnic slurs, inappropriate jokes or language
- Negative stereotyping
- Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature in which:
 - submission is an explicit or implicit term or condition of employment
 - submission to or rejection of the conduct is used as the basis for making employment decisions, including advancement
 - any situation related to career advancement that constitutes a quid pro quo, or this for that



Reaching out

Living Spire means holding each other accountable and reminding one another of the Code of Conduct, laws, policies and regulations that guide us.

Sample Scenario

Susan, a new employee, complained to her supervisor that Bob, a co-worker, was using inappropriate language that made her uncomfortable. The supervisor told Bob, who then refused to continue to train Susan in her responsibilities.

Bob's refusal to train Susan is considered retaliation.

While Bob's actions are against Spire's Code of Conduct in a number of ways, this situation could have been prevented if the supervisor had corrected Bob's behavior without disclosing the actual complaint or who complained.

Speak up.

We believe it's essential to create an environment where everyone feels safe speaking up. We prohibit any form of retaliation against anyone, who, in good faith, reports violations or even suspected violations of this Code of Conduct, company policy or applicable law. This includes any retaliation against those who assist in the investigation of a reported violation. Acts of retaliation should be reported immediately to your Human Resources Business Partner or the Compliance Helpline.

Q&A:

Do I have to report a suspected violation?

Yes. Whenever you suspect a violation of the Code of Conduct, it's required that you report it.

Where can I find contact information for reporting a violation?

Page 24 has all the contact information you need.



Staying safe and valuing others

Living Spire means creating an environment where every Spire team member feels safe, valued and heard.

Stay safe.

You deserve to work in a place where you feel safe and protected. Any form of violence or even threats of violence, like verbal or physical threats, intimidation, harassment and coercion are not welcome here. For your safety, weapons, firearms, ammunition, explosives and incendiary devices aren't allowed on company property, work sites or in company vehicles.

Abide by drug and alcohol policies.

Alcohol and drug use can impact the safety of our employees and the community, and the quality and effectiveness of our company's operations, potentially harming fellow employees, the communities we serve and Spire's reputation.

That's why the use, possession, sale, purchase, distribution, manufacturing or transfer of alcohol, illegal drugs or unauthorized drugs is not allowed while performing your safety sensitive or covered duties at any Spire location or work site. It is important that neither you, nor any other Spire employee, report to work or perform any job

duties with any measurable alcohol or drugs in your system. It's one of the many ways we work to keep each other and our communities safe.

Many employees are covered by the Pipeline and Motor Carrier drug and alcohol testing policies. All employees are covered by the post-accident doctor treated injury drug and alcohol testing policy. These policies supersede all other policies if there is a conflict.

If you or a team member are struggling with alcohol or drugs, we want to help. Assistance is available through a local Employee Assistance Program (EAP). Participation in a company-sponsored EAP is optional unless you receive a mandatory referral to the EAP. If you receive a mandatory referral, you must comply with the program. If you don't comply, you may be subject to discipline up to and including termination of employment.

Q&A:


Why are drugs and alcohol prohibited?

Because safety is a core value at Spire. If judgment is impaired, the safety of the employee, co-workers, customers and the community are potentially in jeopardy.

Which of these is considered harassment?

- A. Negative stereotyping
- B. Racial slurs
- C. Unwelcome sexual advances
- D. All of the above

The answer is D, all of the above. If you experience or witness any of these behaviors, report it immediately.



Protecting information and assets

Living Spire means keeping valuable company, employee, customer and third-party information safe.

Respect employee privacy.

Like all companies, we work with personal employee information. We respect your privacy, so we are careful to only use personal information for business reasons consistent with the law. Access to personal employee information is limited only to those who have a business reason to see it, and then only on a need-to-know basis for the performance of their job. If you handle personal information regularly in your role, we ask that you do everything possible to protect it. If you'd like to view your personal information, you have that right and can contact Human Resources with a request.

Keep company information confidential.

All employees should protect confidential and proprietary information. Always assume that information related to Spire is confidential unless it has been released in authorized public documents or communications.

Confidential and competitive information should never be shared:

- With family or acquaintances
- At social gatherings
- In public areas
- Online
- In photographs or copies

Sample Scenario

Do

Ed, a service technician, repairs his mother's furnace using a wrench provided by Spire.

This is an appropriate incidental use of a Spire asset.

Don't

Ed, a service technician, repairs his mother's furnace using a vent tee from his truck.

This is theft of a Spire asset because Spire will no longer have use of the vent tee.

Protect Spire's assets.

Part of living and working with integrity means protecting Spire's assets. Theft, carelessness and waste have a direct impact on profitability. Even things like office supplies, tools, field equipment, computer equipment, buildings and materials are expected to be used only for business purposes (although incidental personal use is acceptable). Also, we ask that you not use Spire's name, or any brand name or trademark owned or associated with Spire for personal use.

Keep customer and third-party information safe.

Customers and third parties entrust us with their information, and we take that trust seriously. So, we follow applicable laws and regulations directed toward privacy and information security. Always use confidential customer or third-party information for the reason it was provided. And, do not access information if you do not have a business reason to do so. If you do need access, do what is necessary to protect the information against unauthorized use or release.

Protect intellectual property.

Intellectual property laws protect many of the materials we use every day. We value the protection of patents, trade secrets, copyrights, trademarks and other proprietary information. We also respect the valid intellectual property rights of third parties. Patent laws for inventions, trade secret laws for proprietary information and trademark laws for product and services names also fall under the intellectual property category.

Use electronic communications responsibly.

While Spire provides information technology resources to all employees for effective communication, any company-provided asset comes with responsibilities.

Before using Spire-provided technology, here are a few things we want you to know:

- Spire has the right to monitor any and all aspects of the computer systems and networks, including, but not limited to, documents created or stored on the system, deleted data, internet sites visited, chats and news groups, downloaded or uploaded materials and sent or received emails.
- We do have the right to access this information without permission, so use company technology wisely.
- Always use technology in compliance with Spire's policies, including those prohibiting harassment and discrimination.
- Carefully consider emails since that content and those attachments could be broadly distributed.
- Apply the same care and sensitivity in preparing emails and voicemails as you would use in preparing hard copy versions of the same messages.

Please see the applicable electronic usage policy for more details and guidance.

Manage records properly.

Records are our corporate memory, providing proof of actions and containing data and information about our business. Records may consist of any form of information created or received by Spire, whether originals or copies, regardless of media. All records are the property of Spire and should be handled in accordance with the Records Information Management Policy.

We are responsible for properly labeling and carefully handling and securing confidential, sensitive and proprietary information. We should maintain records and documents that have not reached the retention expiration. If the record has reached the end of the retention period and is no longer useful for business purposes and is not subject to a legal hold for litigation purposes, refer to the Records Information Management Policy for more specific guidelines on how to appropriately dispose of records.

Maintain accurate records.

Every Spire employee, including you, helps us keep reliable and accurate records. Accurate records help us prevent fraudulent activities. We are responsible for making sure the information we record, process and analyze is accurate and recorded following applicable legal and accounting principles. We also need to make sure records are secure and readily available for those who need the records in a timely manner. Always accurately record funds, payments and receipts to stay consistent with our business practices.

Q&A:

Is company information on my personal computer still Spire's property?

Yes. If company information resides on your personal computer, that information still belongs to Spire.

Can any employee access private information for employees or third-parties?

No. This information is only available based on business necessity.

Is it okay for records to be thrown away after they're done being used?

No. All records have a retention expiration date and should be kept until that date has passed, and the proper procedures should be followed when disposing of records.

Can your personal email be accessed by Spire if opened on a company device?

While it's rare, personal email can be accessed by Spire if it resides on a company-issued electronic device. It's always best to use electronics wisely, and operate with integrity in this and every area.

We use materials every day that fall under copyright laws. So it's always best to use these materials in permitted ways. Here are some general examples:

- Computer software
- Music
- Artwork
- Audio and video tapes
- Books
- Presentations
- Training materials
- Periodic publications, including newsletters

Company records encompass a wide-range of communications, including:

- Email
- Paper documents
- Electronic files
- Tapes or discs
- Timecards
- Payroll
- Accounting and financial data
- Performance records



Operating with integrity

Living Spire means acting with integrity in everything we do. From honesty in our advertising to our trading practices, we value our reputation as an ethical company that's always committed to doing what's right.

Promote fair competition.

We know that fair and open competition is a true benefit to the homes and businesses we serve. Any business practices that promote collusive or unfair behavior are not only against our values, but they are also against antitrust laws in the United States. If these laws are broken, it could result in significant penalties for Spire and the employees who violate the law. Spire employees should never fix prices, rig bids or divide up markets or customers with competitors. In addition, attempts to discriminate in prices or terms of sale among our customers or to restrict their freedom to compete are illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors.

Be honest in advertising and marketing.

It is an important part of who we are to accurately represent Spire and our products in every communication. Misleading messages, leaving out important facts or making false claims about our products,

Sample Scenario

Do

Use factual information.

Natural gas water heaters heat water twice as fast and cost less to operate than electric water heaters.

Don't

Use superlatives and information that can't be verified.

Natural gas is the best energy source available.

individuals or competitors goes against our values. Depending on your role, you may sometimes make comparisons between our products and our competitor's products. When you do, make factual and accurate statements that can be easily verified.

Gather competitive information fairly.

Knowing our competitors is good business. It helps us stay competitive in the marketplace. That being said, we should always gather this information legally and ethically. It is also appropriate to gain information from customers and suppliers (unless they are prohibited from sharing the information). Sometimes, you can even obtain a license to use or purchase the information. If you're working with consultants, vendors and other partners, it's always best to make sure they understand and follow Spire's policy on gathering competitive information.

Make purchases fairly.

We strive to work with third parties who embrace and demonstrate ethical business behavior. The suppliers, contractors and consultants we work with are part of the Spire team and should embrace our core values. In order for third parties to work with us, they must be confident that we will treat them fairly. We offer fair opportunities for prospective third parties to compete for our business through an available Request for Proposal process. The manner in which we select our suppliers and the character of the suppliers we select reflects on us and how we do business.

Stand against corruption and bribery.

The United States and many other countries have laws that prohibit bribery, kickbacks and other forms of improper payments. Spire employees, contractors or agents should never accept or offer or provide bribes or other improper benefits to gain a business advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money or promises) to influence and encourage action or to secure an unethical advantage. In addition, the Foreign Corrupt Practices Act and other U.S. laws prohibit payment of any money or anything of value to a foreign official, foreign political party or any candidate for foreign political office in order to obtain, retain or direct business. All employees, officers, agents and independent contractors are expected to strictly abide by these laws.

Give and receive gifts sensibly.

Modest gifts and entertainment are often used to strengthen business relationships. Gifts like an occasional lunch, sporting event or anything in line with a normal business practices are acceptable. You should not accept gifts, favors or entertainment that obligates, appears to obligate, or influences your judgment on business decisions. In general, unless you have supervisory approval, you should not provide gifts that you wouldn't be able to accept.

Using legitimate sources of competitive information is a welcome practice. It's always safe to use:

- Industry surveys
- Displays at conferences and trade shows
- Public information available online

When giving gifts:

- Always avoid cash or gift cards in connection with a business transaction
- Promising or making loans and investments of any kind without first fully complying with the Authorization Policy and applicable record keeping requirements is always against our policy

When receiving or giving a gift as a Spire employee, officer, a Board member, employee family member, agent or agent family member, never request or solicit a gift, and always avoid gifts:

- In cash or cash equivalent (i.e., gift cards)
- That aren't consistent with customary business practices
- That are extravagant in value
- That are in violation of the U.S. Foreign Corrupt Practices Act
- That violate any other laws or regulations
- That could cause embarrassment to or discredit of our company

Conflicts of interest occur in situations where you:

- Own, directly or indirectly, financial interest in a company that does business, seeks to do business with or competes with our company
- Hold a second job that interferes with your ability to do or competes with your regular job
- Employ, consult or serve on the board of a competitor, customer, supplier or other service provider
- Hire a supplier, distributor or other agent managed or owned by a relative or close friend
- Solicit or accept any cash or extravagant gifts from a competitor, supplier or customer
- Take personal advantage of corporate opportunities
- Violate your confidentiality agreement with Spire
- Supervise any activity of a company with which you have an ownership interest or relationship with an owner

Always keep these types of information inside the company:

- Facts about possible business deals, such as a merger, purchase, sale or joint venture
- Financial results or changes in dividends
- Important management changes
- Major raw material shortages or discoveries
- Significant product or manufacturing process developments
- Gain or loss of a significant customer or supplier
- Major lawsuit or regulatory investigation
- Any other information that may positively or negatively affect the stock price of Spire or any other company

Exercise caution when working with government customers or contractors.

If you ever work with federal, state or local governments, make sure all statements and representations to officials are accurate and truthful, including financial data. If you're working with the government, be alert to the special rules and regulations that apply to government customers, avoiding anything that could look questionable to the outside world. This includes payments, gifts or other favors. If these activities aren't avoided, they may expose you, the government agency, the government employee and Spire to substantial fines and penalties. That's why any sale of our products or services to federal, state or local government bodies must follow company policy. If you are unsure if a transaction is acceptable, please contact compliance at Compliance@SpireEnergy.com.

Avoid conflicts of interest.

As Spire team members, it's up to us to protect our company's reputation. So we need to be sensitive to even the appearance of a conflict of interest. That's why we ask all employees to avoid any investment, interest, association or activity that may cause others to doubt our company's integrity, or that interferes with your ability to perform job duties objectively and effectively. Make sure any outside activity is strictly separated from your work at Spire, and never use company resources or personnel for activities not related to Spire. If you believe you may have a conflict of interest, you are required to disclose the potential conflict to Compliance@SpireEnergy.com. The potential conflict will be reviewed.

Stay clear of insider trading.

Our company shares information openly with all employees and the Board of Directors. At times, you may receive confidential company information before it's made available to investors and the public. Some of that information may be considered material and could be important to an investor deciding to buy, sell or hold securities, such as Spire stock.

Insider trading laws also apply to you as a member of the Spire team. These laws prevent you from using confidential information for personal benefit and from providing inside information to outside parties for their benefit. You may purchase and sell Spire stock, exercise options granted to you or transfer stock into or out of Spire stock funds in any company savings plan or benefit plan when you are not in possession of material inside information. As an employee or director, you also cannot trade in Spire securities during quarterly and other blackout periods. Even if you are not covered by formal blackout restrictions, you are encouraged to wait at least 24 hours after material information has been publicly disclosed before trading. As always, when in doubt, consult the legal team, the Corporate Secretary or email Compliance@SpireEnergy.com.

Comply with laws regarding regulators.

Given the highly regulated environment in which we operate, we must always comply with relevant laws and regulations. We expect you to respond to regulator requests for information quickly and appropriately, in consultation with the legal and regulatory teams. You should stay educated about new laws and requirements that affect our business. This includes being aware that new products or services may be subject to special legal or regulatory requirements. If you become aware of any significant regulatory or legal concerns, you should always bring them to the attention of your supervisor, manager or the legal department. We are committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance and product performance.

Communicate carefully with external parties.

We have a team of highly trained individuals who communicate with media, investors and analysts on behalf of our company. Outside of that team, we ask that you not speak on behalf of Spire in any public communication.

Always avoid speaking on behalf of Spire in:

- Social media posts
- Blogs
- Chat rooms
- Bulletin boards
- Letters to the editor
- Product endorsements

Q&A:

Is it okay to compare our product with our competitor's?

Yes, but only if the comparison is accurate and easily verified.

When working with a government employee, can I pay for lunches?

No. When dealing with government employees, even food and beverage purchases are prohibited. It is important to avoid anything that could appear like bribery.

Who is responsible for protecting Spire's reputation?

Protecting Spire's reputation is the responsibility of every employee and director.

When is it not safe to purchase, sell or transfer Spire securities?

When you have access to non-public material information, during blackout periods and if material information has been public for less than 24 hours.

Should I talk to the media if approached?

Unless authorized by the communications department, you should not speak on behalf of the company in any public setting.



Caring for our communities

Living Spire means delivering on our mission to advance communities and enrich lives where we live and work every day.

Live Spire.

We're continually challenging ourselves and asking what it means to be a good company. So we strive to align our social and environmental aspirations with our business goals, developing metrics that help us assess our progress in operating as an ethical, responsible and respected company.

Serve your community.

Spire's ambitious mission calls on us to serve the communities where we live and work. And, your efforts will be supported by Spire through matching gifts, paid time off to volunteer and financial contributions to the nonprofit organizations where you regularly volunteer.

In addition, we support local community events with sponsorships and employee volunteers. Local organizations also gain Spire support through board placement. It's all part of how we live our mission every day.

While we support a variety of the organizations Spire team members care about most, we do have some guidelines. Using company resources for personal charitable causes, for example, is prohibited. We also have certain requirements an organization must meet before Spire will provide funding or matching gifts. If you have any questions, contact Compliance@SpireEnergy.com.

Be good stewards of the environment.

We are committed to doing business in an environmentally responsible way. We use energy wisely and efficiently and employ technology to minimize the risk of environmental impact. If your position affects environmental compliance, you should be completely familiar with the permits, laws and regulations that apply to your work. All employees are responsible for making sure that Spire business is conducted in a way that is environmentally friendly.

Follow political contribution laws.

Spire supports employees being active, informed and involved citizens. Your contributions to a candidate or a political party should always be at your own expense and political activities must be on your own time. Personal political activities should never appear to be endorsed by Spire—this includes using Spire facilities or trademarks for a political event without approval. By following these guidelines, we are in compliance with U.S. federal and state laws and the laws of many countries that prohibit corporations from making political contributions and regulate corporate lobbying efforts.

That being said, the Federal Election Campaign Act allows a company to establish a political action committee. The Spire Missouri Political Action Committee (PAC) helps employees pool personal funds so we can support candidates who share our company's views on important public policy issues. Participation in the PAC is entirely voluntary. Information about whether or not you contribute to the PAC is restricted to those who administer it and is used only to fulfill legal reporting requirements. From time to time, the PAC may host policy forums with candidates or elected officials on Spire property. Since these events are voluntary, it's important that employees not use their position to coerce or pressure others to make contributions or support candidates or political causes. In certain instances, we may encourage employees to support or oppose legislative issues that affect our company's businesses but using a position of authority to make another employee feel compelled or pressured to donate, vote for, work for, or on behalf of any legislation, candidate, political party or committee is against the law and Spire policy.

Q&A:

Will Spire match my charitable donations?

Yes, up to \$2,500 per year as long as it meets our guidelines for matching funds.

Am I obligated to get involved in Spire's PAC?

No. Involvement in the PAC is voluntary.

What is my role in helping Spire be environmentally responsible?

Use energy wisely and strive to eliminate waste. And, if your work affects environmental compliance, familiarize yourself with the permits, laws and regulations that apply.



Administering the Code of Conduct

Living Spire means honoring the Code of Conduct in our daily work.

Waiver of policies.

Spire will waive application of the policies in this Code of Conduct only when based on the best interests of Spire and its shareholders. Any waiver must be approved by the Chief Compliance Officer and by the Chief Executive Officer. Waivers of the Code of Conduct for the Board of Directors and executive officers must also be approved by members of the Board of Directors who are not involved in the possible waiver. All waivers must be promptly disclosed as required by law or regulation.

Comply with the Code of Conduct.

Spire has its Code of Conduct to help employees work ethically and safely and in accordance with Spire's core values of safety, inclusion and integrity. Becoming familiar with the Code of Conduct, and living by it helps us maintain an inclusive, ethical workplace where employees can thrive.

By following Spire's Code of Conduct, you can avoid disciplinary action that may include loss of employment. Employees who knowingly make false allegations, provide false information, refuse to cooperate in an investigation and leaders who fail to take appropriate actions after receiving a report of a suspected violation are also subject to discipline, up to and including discharge.

If an investigation is necessary, full cooperation is required and appreciated. Failure to cooperate is a violation of the Code of Conduct. By using this Code of Conduct to inform our behaviors and decisions, the goal is always to avoid that situation entirely.



Contact us

If you believe that there has been a violation of the regulations, policies and laws referenced in our Code of Conduct, please report the violation by contacting:

- Your direct supervisor
- Your HR Business Partner
- The Ethics Helpline at 800-886-2553 or online at www.spireenergy.ethicspoint.com
- Contact the Chief Compliance Officer at Compliance@SpireEnergy.com

Photo credits

Cover

Alvin Davis
Crewman
Birmingham, AL

Working responsibly (page 6)

Bradley Toenjes
Gas man-service installation truck
St. Louis, MO

Creating a culture of inclusion (page 8)

Chris Olaes
Keri Feldman
Nandini Parchure

Reaching out (page 10)

Danielle Holland
Community services partner
St. Louis, MO

Staying safe and valuing others (page 11)

Cody Chandler
Leak truck man
St. Louis, MO

Protecting information and assets (page 13)

Rodger Riley
Distribution system controller
St. Louis, MO

Operating with integrity (page 16)

Marvin Oates
Apprentice service tech
Mobile, AL

Administering the Code of Conduct (page 22)

Dana Niehaus
Lead, HCM strategy
St. Louis, MO

Contact us (page 23)

James Whitfield
HR business partner
St. Louis, MO