

CRAFTING A COMMUNICATION PLAN THAT WORKS

2017 SCCE UTILITIES AND ENERGY CONFERENCE



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CONTACT INFORMATION

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AGENDA

- Introduction
- Background
- Anatomy of the Plan
- Results
- Conclusion

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INTRODUCTION

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DUKE ENERGY

▪ Customers

- 7.4 million retail electric customers, representing population of approximately 23 million people
- 2 million natural gas customers with recent acquisition of Piedmont Natural Gas

▪ Regulated Generation

- Over 50,000 MW

▪ Non-regulated Generation

- Duke Energy Renewables - wind/solar generation throughout US – 1,700 MW

▪ Workforce

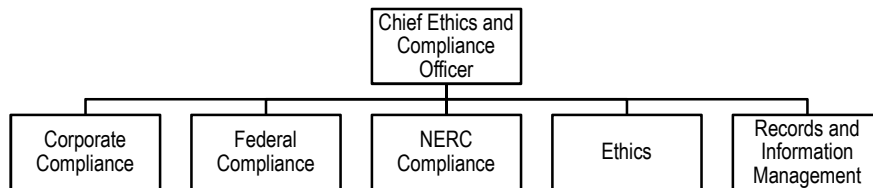
- Approximately 29,000 employees



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ETHICS AND COMPLIANCE AT DUKE ENERGY



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E&C COMMUNICATION PLANNING

- Created a department communication plan in Fall of 2015
- Rolling three year plan that includes training
- Each activity tied to department goals and focus areas
- Information included on plan:
 - Format and media
 - Channels for distribution
 - Targeted audiences
 - Cadence and timing
 - Evidence
 - Potential measurement

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ETHICS SUB-PLAN

- Also have a sub-plan focused specifically on Ethics communications
- Activities are sorted by audience and focus on a quarterly theme

2016	2017
Code of Business Ethics	Respect and Civility
Ethical Decision Making	Conflicts of Interest
Reporting a concern	Business Courtesies
Policy against Retaliation	Reporting and Retaliation

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EXTERNAL ASSESSMENT

- Summer of 2015: Mandated assessment of our business ethics program
- Monitor conducted an anonymous survey sent to operations personnel in targeted business unit
- 12 questions, sent to 277 employees, 65% response rate
- Topics included:
 - Access to Code of Business Ethics (CoBE) and other documents
 - Perceptions of immediate leaders
 - Whether employees felt pressure to compromise integrity
 - Knowledge and confidence of reporting mechanisms and non-retaliation policy

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#	2015 Question
1	I am familiar with the company's Code of Business Ethics and have had training on the Code of Business Ethics in the last year.
2	I know where to access the Code of Business Ethics and other company regulations that affect my job responsibilities and that it is required that all employees comply with the Code of Business Ethics and company regulations.
3	I know the company has an EthicsLine to report ethical or compliance issues; and that I may report anonymously.
4	The ethics and compliance training that I have received is informative and enables me to apply it to my job.
5	I believe the company and my managers behave according to the law and regulations and would not knowingly break the law or not comply with regulations.
6	I do not feel pressured to compromise company standards of ethical business conduct in order to achieve business objectives.
7	If I have an ethical or any concern about a business practice, I have an effective channel through which to bring about a management review of the practice.
8	I would feel comfortable reporting misconduct, and/or ethics and non-compliance issues.
9	The company's commitment to high personal ethics and integrity has been clearly communicated, and is demonstrated by the conduct of our managers.
10	I know the company does not permit retaliation for reporting safety concerns, misconduct, or unethical or illegal behavior.

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THE PLAN IS BORN

- Examples of topics identified for improvement, based on questions with 10% or greater negative responses, included:
 - Access to CoBE and other work practices
 - How to report a concern
- Committed to a communication plan targeted to workers in specific business unit, including contractors
 - Messages were tailored to ensure applicability to both employees and contractors

ANATOMY OF A PLAN

STRATEGY

- Timeline – Planning took place in 4Q15, execution in 1Q16 and 2Q16, with the goal of resurveying in summer 2016
- Topics – Included Ethical Decision Tree
- Channels – Diverse methods to reach remote workforce
- Buy-In and integration– Critical to success
 - Needed support from business unit leaders
 - Not the flavor of the month
 - Use managers as our mouthpiece

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CONFERENCE CALL

- Provided background of the assessment
- Explained importance of cooperation with monitor
- Summarized planned activities, timing, and responsibilities
- Commended their leadership and expressed gratitude for their ongoing support

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EMAIL TO BU WORKERS

- Drafted by Ethics staff, sent from BU leader
- Integrated into year-end email to staff
- Provided high level summary of topics to be covered in coming months
- Included mention of consultant and upcoming communications
- Other topics included safety, values, and what's in store for BU next year

NEWSLETTER ARTICLES

- Included an ethics article in existing department newsletter
- Ghostwritten by Ethics staff
- Hyperlinked wherever possible
- Newsletter included information related to asset performance and safety metrics and was thus commonly read, making it a high value channel

BU STATUS CALLS

- Prepared talking points for 3 BU status calls on a monthly basis
- Ethics staff conducted first calls as a demonstration for staff.
- Eventually discontinued due to belief that same content covered by immediate supervisor was more impactful

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QUICK TAKE PRESENTATIONS

- Many work independently or on small teams in remote locations
- Have mobile access but not working from a desk
- Tailgate meetings and pre-job briefing already in place
- Created short, 3-5 slide presentations with talking points
- Did not require submittal of attendance records
- Have since been repurposed and live on our portal library

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THE RESULTS

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RESURVEY

- Reviewed and revised the original survey, keeping number of questions in mind
 - Separated out combination questions
 - Ex. "I am familiar with the company's Code of Business Ethics and have had training on the Code of Business Ethics in the last year."
 - Looked for other data points to forego certain questions
 - Ex. Employee Engagement Survey
 - Compliance questions to relevant audience only
- Reviewed new survey with consultant

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2015 Survey Questions			2016 Survey Questions	
#	2015 Question	Comparable EES Survey Question	#	2016 Question(s)
1	I am familiar with the company's Code of Business Ethics and have had training on the Code of Business Ethics in the last year.	N/A	1	I am familiar with the company's Code of Business Ethics (CoBE) and have had training on the CoBE in the last year.
2	I know where to access the Code of Business Ethics and other company regulations that affect my job responsibilities and that it is required that all employees comply with the Code of Business Ethics and company regulations.	N/A	2	I know where to access the CoBE.
		N/A	3	I know where to access other company regulations that affect my job responsibilities.
		N/A	4	I know that all employees are required to comply with the CoBE and company regulations.
3	I know the company has an EthicsLine to report ethical or compliance issues; and that I may report anonymously.	N/A	5	I know the company has an EthicsLine to report ethical or compliance issues; and that I may report anonymously.
4	The ethics and compliance training that I have received is informative and enables me to apply it to my job.	N/A	6	The ethics and compliance training that I have received is informative and enables me to apply it to my job.
5	I believe the company and my managers behave according to the law and regulations and would not knowingly break the law or not comply with regulations.	Senior leadership in the company places a high priority on compliance with regulations and policies.	7	I believe the company and my managers behave according to the law and regulations and would not knowingly break the law or not comply with regulations.

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6	I do not feel pressured to compromise company standards of ethical business conduct in order to achieve business objectives.	In the past 12 months, I completed my work without pressure from others to compromise the company's Code of Business Ethics, company policy, or the law.	8	In the past 12 months, I completed my work without pressure from others to compromise the company's Code of Business Ethics, company policy, or the law.
7	If I have an ethical or any concern about a business practice, I have an effective channel through which to bring about a management review of the practice.	N/A	9	If I have an ethical or any concern about a business practice, I have an effective channel through which to bring about a management review of the practice.
8	I would feel comfortable reporting misconduct, and/or ethics and non-compliance issues.	I can report unethical practices without fear of reprisal.	10	I can report unethical practices without fear of reprisal.
9	The company's commitment to high personal ethics and integrity has been clearly communicated, and is demonstrated by the conduct of our managers.	N/A	11	The company's commitment to high personal ethics and integrity has been clearly communicated.
		My immediate supervisor sets a good example of ethical business behavior.	12	My immediate supervisor sets a good example of ethical business behavior.
10	I know the company does not permit retaliation for reporting safety concerns, misconduct, or unethical or illegal behavior.	I can report unethical practices without fear of reprisal.	13	I know the company does not permit retaliation for reporting safety concerns, misconduct, or unethical or illegal behavior.

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PRE-SURVEY COMMUNICATION

- Drafted pre-survey communication to be sent from business leader
 - Reorganization and new leadership became opportunity for new leadership to assess culture

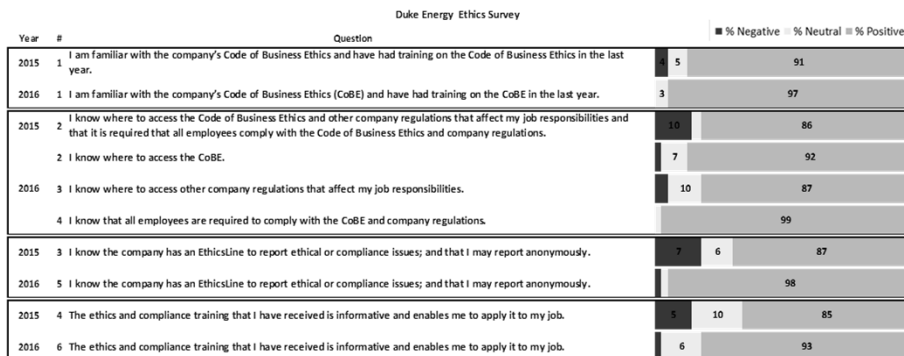
As I discussed at our all hands meeting yesterday, each of us has a responsibility to perform our work with integrity and honesty. A culture of ethical behavior is critical to our business success and defines our relationships with each other. As part of my effort to understand our compliance and ethics culture, I am requesting your feedback by participating in a short, anonymous survey. The overall survey results will be used to measure our progress in creating a constructive work environment.

A link to the survey will be sent to you from the Ethics Office (ethicsofficer@duke-energy.com) on or about August 8th. You will have two weeks to complete it.

Your individual participation is important and appreciated.

SURVEY RESULTS

- Example of results below shows significant improvement from previous survey



SUMMARY

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CONCLUSION

- Satisfactory result with monitor
- Provided demonstrable effectiveness and value
- Formed lasting alliances with all levels of BU leadership
- Small increase in concerns brought to our attention
- Inspiration for business unit communicator toolkits

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TAKEAWAYS

- Take the time to document your plan on paper. It helps to see the bigger picture
- Involve stakeholders early. Be gracious. Ask for help
- Use multiple approaches to reach diverse populations and make the messages sticky
- Messages from managers carry a lot of weight
- Review impact on business and adapt along the way
- Make it easy by doing the leg work and reducing administrative burden

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QUESTIONS

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APPENDIX

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DER Communication Plan

November 11, 2015



Overview

- **Goal:** To increase awareness by providing information to workers (employees and contingent workers) about key components of the ethics program
- **Key Messages:**
 - Do the right thing
 - Reinforce key sections of the CoBE applicable to targeted business unit as identified in risk assessment
 - How to access the CoBE and other company documents
 - Seek help if you are unsure of what to do
 - Workers are expected to report concerns
 - How to report a concern
 - The investigation process
 - Protection from retaliation
- **Audience:** Operations personnel of targeted business unit
- **Launch Timing:** To commence in 4Q15

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Elements of the Plan

1 Conference Call with Senior Mgrs

- **Objective:** Communicate the purpose and components of the plan to senior managers
- **Launch:** Mid November 2015

2 Email to all Workers

- **Objective:** Provide workers with an overview of the plan
- **Launch:** Mid November 2015

3 Newsletter Articles

- **Objective:** Reinforce key CoBE topics and reporting information
- **Launch:** January 2016

4 Message in Daily/Weekly Calls

- **Objective:** Reinforce 3 key points:
 - Where to find CoBE and policies
 - How to make a report or inquiry
 - Policy of non-retaliation
- **Launch:** January 2016

5 Quick Take Presentations

- **Objective:** Supervisor reinforcement of the message in team meetings
- **Launch:** January 2016

6 Ethics Info in ILTs

- **Objective:** Provide information to new and existing workers during new hire academy and annual refresher
- **Launch:** January 2016

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Communication Activities

Element	Deliverable	Audience	Channel	Owner	Details	Draft Due	Target Date
①	Risk Assessment	N/A	N/A	Ethics and BU Training	Identify which sections of the CoBE carry the most risk for BU workers	Nov 15	N/A
①	Talking Points for Call w/ staff	Leader's Direct Reports	Conf Call	BU	Talking points for conversation to reinforce commitment to ethics, role of leaders, and the elements of the plan	Dec 1	Dec 7
②	Email Message	All BU Workers	Email	BU with support from Ethics	To include expectations to act ethically, know the requirements of your job, report concerns, and prevent retaliation	Dec 7	Dec 14
③	Newsletter Article(s)	All BU Workers	Monthly EHS Newsletter	Ethics	Ongoing short articles about key CoBE topics based on findings of risk assessments	TBD	TBD

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Communication Activities

Element	Deliverable	Audience	Channel	Owner	Details	Draft Due	Target Date
④	Talking points for Ops call 1	Area Managers	Daily Solar Call	BU Training w/ support from Ethics	Include information on key messages with the expectation the information will be cascaded to all workers	Draft for first call Dec 15	First Call of 1Q16
④	Talking points for Ops call 2	Area Managers	Daily Wind Call	BU Training w/ support from Ethics	Include information on key messages with the expectation the information will be cascaded to all workers	Draft for first call Dec 15	First Call of 1Q16
④	Talking points for all hands call	Reps from each site and support group	Daily Fleet Call	BU Training w/ support from Ethics	Include information on key messages with the expectation the information will be cascaded to all workers	Draft for first call Dec 15	First Call of 1Q16
⑤	Manager Toolkits	Cascaded to all workers	Team meetings	Ethics	Toolkit with ~ 5 slides and talking points to cover main topics to be delivered by direct supervisors	Jan 15	Feb 1

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Communication Activities

Element	Deliverable	Audience	Channel	Owner	Details	Draft Due	Target Date
⑥	Training Presentation	New BU workers	BU New Hire Academy	BU Training with support from Ethics	Develop and include an ethics presentation in academy syllabus	Jan 15	TBD
⑥	Training Presentation	Existing BU workers	Annual ILT Refresher	BU Training with support from Ethics	Develop and include ethics messages in refresher syllabus	Jan 15	TBD

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Items for Discussion

- Responsible parties and contacts for the newsletter articles
- Process for conducting basic risk assessment
- Contacts for operations calls and weekly all hands call
- Deliverable timeline
- Ethics information in academy to be presented by BU Training or Ethics
- Engagement of BU HRBP and legal employee relations support

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EMAIL TO BU WORKERS

As you know, our success depends on our ability to earn and maintain the trust and confidence of our customers, shareholders, regulators, and communities. In an effort to continually evaluate our ethics and compliance culture, our ethics and compliance program was recently assessed by an independent consultant. The consultant conducted a survey of renewables employees, and identified three main areas of awareness for improvement. As a result, we will be highlighting some of these topics in the coming weeks and months, so keep an eye out for more information. For now, take a look at a summary of the topics below.

The Code Of Business Ethics (CoBE) – The CoBE describes how we conduct business with integrity. Use it as a guide to help you make decisions in your everyday activities. You can view the entire CoBE in our [interactive code](#). We expect contingent workers to abide by these same fundamentals as described in the [Supplier Code of Conduct](#).

Reporting a Concern - In addition to knowing and abiding by the ethical standards, it is important that you know about your responsibility to ask a question or report a concern if something doesn't seem right. To make sure your concern is addressed, speak to your supervisor or someone else on your management team, your [HR Business Partner](#), or the [Ethics Office](#). If you are not comfortable with these options, or if you want to remain anonymous, contact the EthicsLine at 1.866.8ETHICS or online at <https://ethicsline.duke-energy.com>.

Policy Against Retaliation - Duke Energy prohibits retaliation against anyone who in good faith reports a concern to management, Human Resources, the Ethics Office, or regulatory agencies. Anyone found to have committed retaliation will be subject to disciplinary action, up to and including termination of employment. You can find out more about our stance against retaliation in the [Open Door Policy](#).

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NEWSLETTER ARTICLES

We all have a duty to report. Here's how.
At Duke Energy, our ethical culture is one of our most valuable assets, as an unhealthy culture can lead to a host of problems, including lost productivity, poor morale, or even cases of misconduct. That's why it's critical that each of us remain committed to our core values and our responsibilities as Duke Energy workers. One of these responsibilities is our duty to ask questions when unsure and report any concerns, compliance violations, or instances of misconduct.

There are numerous ways to make a report or ask a question. We value clear and open communication, and encourage you to speak directly with your supervisor or another member of your management team when possible, especially if you have a question about a work practice. If you are not comfortable with this option, you can speak to your Human Resources Business Partner. You can also contact the Ethics Office by sending an email or mailing a letter to EthicsLine, P.O. Box 1333, Charlotte, NC 28201.

You can use our EthicsLine by calling 1.866.8ETHICS (1.866.838.4427) or using the online portal. The EthicsLine allows you to report anonymously. The EthicsLine is managed by a third-party vendor and is available any time of day or night, even if you just want to ask a question. No matter how they are reported, all concerns will be treated confidentially to the extent possible. Workers who report a concern in good faith are protected against retaliation, and anyone found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment.

Remember, concerns or cases of misconduct that go unreported remain unresolved and can develop into bigger issues. We are counting on you to do your part. If you have any questions, please feel free to email the Ethics Office or check out their Portal page.

Principals to Guide Our 2016

As we say "so long" to 2015 and finalize our objectives for 2016, it is important to consider not only what we plan to accomplish, but how we will meet the expectations we set for ourselves. Our commitment to integrity is just as important to our success as our bottom line. It takes every employee's dedication and focus to ensure we consistently do business the right way, every day.

Duke Energy has created two documents to help you make the right decisions. The Code of Business Ethics (CoBE) sets forth the standards for conducting business that apply to Duke Energy employees. Contingent workers are held to the same fundamentals, as explained in our Supplier Code of Conduct (SCoC). Some of the topics covered include our commitment to a work environment that embraces diversity and is free of harassment, the importance of engaging in fair and honest business practices, and our responsibility to protect company resources and confidential information.

You can refer to the code that applies to you when you need guidance. You can download a booklet version of the full CoBE or SCoC or you can view specific sections of the CoBE, as well as frequently asked questions and additional resources, as part of our interactive Code.

The CoBE and other resources will help you live up to our company values and ensure that we continue to maintain the trust of those that matter. If you have any questions, please feel free to email the Ethics Office or check out their Portal page. You can also contact them through the Ethics Line by phone at 1.866.8ETHICS or online at <https://duke-energy.alertline.com>, even if you just have a question. Here's to a successful 2016.

Speak Up! We want to hear from you.

The 2016 Employee Engagement Survey results indicate 78% of employees feel they can report unethical practices without fear of reprisal. What about the other 22% who are neutral or the 8% who fear some form of retaliation? At Duke Energy, we value clear and open communications and respect the contributions of all workers. We are committed to maintaining an environment where all individuals are comfortable speaking up without fear of intimidation or retaliation in any form. Retaliation occurs when one worker takes adverse action against another worker because they spoke up about a concern. We also expect suppliers to prohibit retaliation against their own employees who raise a concern.

Retaliation can occur even if the underlying complaint is unsubstantiated. It can also occur between peers, and does not have to involve a supervisor-subordinate relationship. Some examples of retaliation include demotion, termination, reassignment, relocation, increased scrutiny, "cold shoulder" treatment, or exclusion.

If you believe you have experienced retaliation, it is important that you voice your concern so we can investigate. In some cases, there could be legitimate business reasons for taking some of the actions mentioned above, so be sure to reach out for guidance. You can speak to someone on your management team, your HR Business Partner, or the Ethics Office. You can also contact the Ethics Line by phone at 1.866.8ETHICS (1.866.838.4427) or by using the online portal. Contingent workers should direct questions about the terms and conditions of their employment to their staffing company, and can use any of the above methods to report a concern or ask a question regarding a work practice at Duke Energy.

Allegations of retaliation are investigated separate from the initial complaint. Anyone found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment. For more information, review our Open Door Policy or contact the Ethics Office.

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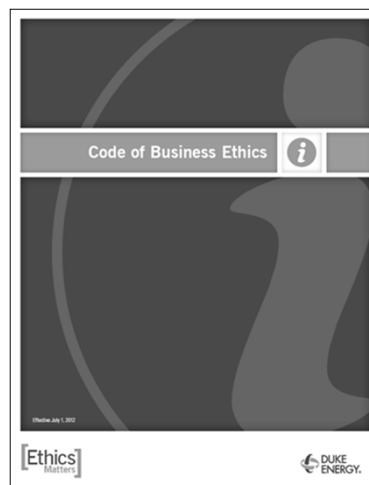


QUICK TAKE – CODE OF BUSINESS ETHICS

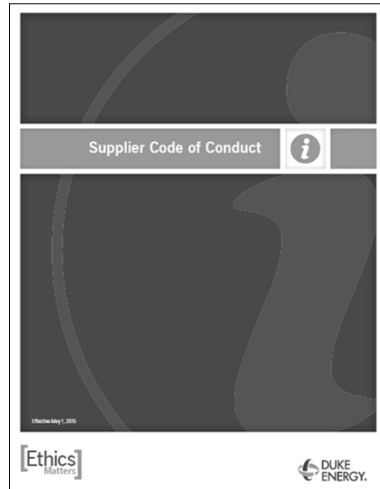
JANUARY 2016

DUKE ENERGY CODE OF BUSINESS ETHICS

- The Duke Energy Code of Business Ethics (CoBE) sets forth the ethical expectations that apply to employees, and:
 - Defines roles and responsibilities for employees at all levels
 - Provides illustrative guidance through scenario-based FAQs
 - Identifies where to go for guidance and to report ethics concerns
- All employees are required to take:
 - New Employee Training (CBT) within 30 days of hire
 - Annual Refresher Training (CBT), usually deployed during the summer



DUKE ENERGY SUPPLIER CODE OF CONDUCT



- Contingent workers are held to similar standards as described in the Duke Energy Supplier Code of Conduct (SCoC)
- Contingent workers are expected to complete SCoC training prior to beginning work for Duke Energy and are not required to take CoBE training

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HOW TO FIND YOUR DOCUMENT

- We encourage you to keep a copy of the Code that applies to you close by on your desk, in your truck, or on your computer so that you can refer to it when you need guidance
- You can access the CoBE in two formats:
 - The booklet version can be downloaded from the Ethics Portal
 - The interactive version allows you to quickly access specific sections and contains additional resources and answers to frequently asked questions
- The SCoC can also be downloaded from the Ethics Portal

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HOW TO ASK QUESTIONS

- There are several ways for you to get more information or ask a question:
 - Check out our Ethics Portal at Portal>Work-Related Sites>Ethics and Compliance>Ethics Office
 - Speak to your supervisor or someone else on your management team
 - Contact your HR Business partner
 - Email the Ethics Office at ethicsofficer@duke-energy.com
 - Contact the EthicsLine, even for just a question, at:
 - 1.866.8ETHICS
 - <https://duke-energy.alertline.com>