

Ethics and Compliance Program Summary

The Audit Committee of Chesapeake Utilities Corporation has adopted and oversees a process for the receipt, retention, investigation and resolution of concerns of improper business conduct, including any violation of or inappropriate behavior related to: i) applicable laws, rules and regulations; ii) the Company's Business Code of Ethics and Conduct (as well as the Code of Ethics for Financial Officers); and iii) accounting, internal accounting controls or auditing matters. Concerns may be submitted to an independent third party via a dedicated toll-free hotline or a secure website, or in written form directly to the Head of Internal Audit.

Submissions via an Independent Third-Party Organization

Employees, shareholders, customers, contractors, suppliers and others may submit concerns to NAVEX Global an independent third-party organization, via the following methods:

- Call the dedicated toll-free reporting hotline at (844) 711-0286 to speak to a live NAVEX Global representative; or
- Submit the concern through NAVEX Global using their secure website - chpk.ethicspoint.com and track the status of the concern via a password and tracking number. If an individual submits a concern through the website, additional supporting documentation may accompany the concern.

The Head of Internal Audit, Chief Policy and Risk Officer, Associate General Counsel, and Chair of the Audit Committee automatically receive e-mail alerts from NAVEX Global when a concern has been submitted and are the only individuals who have access to the information.

Submissions Directly to the Head of Internal Audit

Alternatively, a concern may be submitted to the Head of Internal Audit in a sealed envelope, with the following legend prominently displayed on the front of the envelope: **"Confidential Concern – To be opened by the Head of Internal Audit Only"**. Submissions may be mailed to: Head of Internal Audit, Chesapeake Utilities Corporation, 500 Energy Lane, Dover, Delaware 19901. Individuals may include additional documentation with the written submission to support the concern. Upon receipt of a concern, the Head of Internal Audit will assess its validity and if appropriate, shall promptly forward it to the Chair of the Audit Committee.

Anonymity of Submissions

Consistent with the Securities and Exchange Commission's mandate, all concerns that are submitted to NAVEX Global or to the Head of Internal Audit are confidential and anonymous unless the individual voluntarily chooses to disclose his or her identity. If an individual voluntarily identifies himself or herself, the individual's identity will only be disclosed upon his or her permission, or to the extent that the Chair of the Audit Committee determines that such disclosure is required as part of the investigation of the reported violation.

Investigation and Resolution

All valid concerns will be investigated under the direction of the Chair of the Audit Committee. The Head of Internal Audit will periodically prepare reports, as necessary, to the Audit Committee on the status of all valid concerns until their appropriate resolution.
