BUSINESS CODE OF ETHICS AND CONDUCT
Adopted November 5, 2026

Chesapeake Utilities Corporation ("Chesapeake") is committed to conducting its business in compliance with all applicable laws, rules and regulations and in accordance with the highest ethical standards. In furtherance of this commitment, the Board of Directors of Chesapeake has adopted this Business Code of Ethics and Conduct (this "Code of Ethics") setting forth the principles that govern the conduct of all employees, officers and directors of Chesapeake and its subsidiaries (collectively, the "Company").

As used herein, "Company official" shall mean any officer of the Company. Some provisions of this Code of Ethics also extend to the family members of employees, officers, directors, or nominees for director. For this purpose, the term "family member" shall mean any child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, or sister-in-law, and any person (other than a tenant or employee) sharing the household of any director, nominee for director, or officer of the Company. These associations include adoptive relationships.

I. Compliance with Laws, Rules, Regulations, Policies and Procedures

Each employee, officer and director is expected to understand and comply with both the letter and intent of all applicable laws, rules and regulations and with all Company policies and procedures that apply to matters for which he or she is responsible. All employees and officers are expected to participate in compliance training and information sessions when offered by the Company. **Any employee or officer who is uncertain as to the meaning or interpretation of any law, rule, regulation, policy or procedure, or its application to his or her responsibilities, is expected to seek advice from a supervisor, manager, Enterprise Compliance and Ethics, or other appropriate Company resource.**

II. Conflicts of Interest

In carrying out their responsibilities, all employees, officers and directors have a duty always to act in the best interests of the Company and its stockholders. The ability of an employee, officer or director to fulfill this obligation can be compromised if a conflict exists between his or her personal interests and the interests of the Company. In general, a conflict of interest can arise whenever the personal interests of an employee, officer or director in a matter (financial or otherwise) are different from the interests of the Company and its stockholders. Even where the outcome of the matter is on terms that are entirely fair to the Company, the existence of a conflict of interest can create an appearance of impropriety.

While it is not possible to list all of the situations that could present a conflict of interest, examples include:

- Ownership of a material financial interest in any business or other enterprise that does business (whether as a supplier, customer or otherwise), or is seeking to do business, with the Company.
- Serving as a director, officer or partner of, or in any other managerial role with respect to, or as a consultant to, any business or other enterprise that does business (whether as a supplier, customer or otherwise), or is seeking to do business, with the Company.
- Ownership of a material financial interest in, or serving as a director, officer or partner of, or in any other managerial role with respect to, or as a consultant to, any competitor of the Company.
- Acting as a broker, finder or other intermediary in any transaction involving the

Company.

- Any situation where the employee, officer or director will receive any payment of money, services, loan, guarantee or any other personal benefits from within the Company or a third party in anticipation of or as a result of any transaction or business relationship between the Company and a third party.
- Using a Company position, authority or influence to obtain an improper personal benefit for oneself, a family member or another person.
- Ownership of a material financial interest in any business or other enterprise that does business (whether as a supplier, customer or otherwise), or is seeking to do business, with any competitor of the Company.
- Serving as a director, officer or partner of, or in any other managerial role with respect to, or as a consultant to, any business or other enterprise that does business (whether as a supplier, customer or otherwise), or is seeking to do business, with any competitor of the Company.
- Outside employment, business activities, board service, or other activities that create an actual or potential conflict of interest or the appearance of a conflict of interest.
- Taking a public position or making public statements contrary to the best interests of the Company or that could result in embarrassment to the Company.
- Participating in an employment opportunity, business activity, or other arrangement involving a family member or other close personal relationship that could affect, or appear to affect, independent judgment in matters involving the Company.

A conflict also can exist where the person doing business or seeking to do business with the Company is a family member of an employee, officer or director. However, the acquisition or use by an employee, officer or director of the Company of products or services obtained from the Company in the ordinary course of the Company's business does not represent a conflict of interest.

All employees and officers are encouraged to avoid relationships that create, or have the potential to create an actual conflict of interest or the appearance or perception of a conflict of interest. Employees and officers must be free of any conflict of interest whenever they act on behalf of the Company, including engaging in negotiations or recommending or approving a transaction, arrangement or relationship with an existing or potential customer, supplier, lender or investor. **Any officer who has an actual or potential conflict of interest, or the appearance of a conflict of interest, with respect to any matter is required to make prompt and full disclosure of the matter to the Chief Executive Officer or, in the case of the Chief Executive Officer, to the Audit Committee. All other employees are required to make prompt and full disclosure of any actual or potential conflict of interest, or the appearance of a conflict of interest, to the Head of Internal Audit or to Enterprise Compliance and Ethics.** The existence or disclosure of an actual or potential conflict of interest, or the appearance of a conflict of interest, does not, by itself, constitute a violation of this Code of Ethics.

No employee or officer is permitted to participate in any matter in which he or she has a conflict of interest unless authorized by an appropriate Company official and under circumstances that are designed to protect the interests of the Company and its stockholders and to avoid any appearance of impropriety.

Any officer who has a question as to whether a given situation or relationship might represent a conflict of interest is required to consult with the Chief Executive Officer. Any other employee who has a question as to whether a situation or relationship might constitute a conflict is required to consult with the Head of Internal Audit or with Enterprise Compliance and Ethics.

Directors are required to disclose any actual or potential conflict of interest, or the appearance of a conflict of interest, to the Chair of the Board of Directors and to refrain from voting on any matter(s) in which they have, or may be perceived as having, a conflict.

III. Corporate Opportunities

All business opportunities that are within the existing or reasonably foreseeable scope of the Company's business, including planned business ventures, are the property of the Company. Without the prior consent of the Board of Directors, employees, officers and directors are prohibited from:

- Taking for themselves personal opportunities that they discovered through the use of Company property or information or through their position with the Company;
- Using property or information of the Company or their position with the Company for personal gain; or
- Engaging in any business in competition with the Company.

IV. Confidentiality and Non-Disparagement

A. Confidentiality

Employees, officers, directors and director nominees are required to maintain the confidentiality of, and not use for personal benefit, confidential information entrusted to them by the Company, its customers or its suppliers, or otherwise acquired in the course of their employment by or service to the Company. Disclosure or use of confidential information is permitted only for a proper business purpose and when specifically authorized by an appropriate Company official or as required by law or legal proceedings. Confidential information includes all information protected by law or by an agreement between the Company and a third party, any information identified as "proprietary" or "confidential," or information that might reasonably be regarded as confidential information, as well as other non-public information that, if disclosed, might be harmful to the Company or useful to competitors, including but not limited to:

- Trade secrets, know-how, processes, intellectual property and other proprietary technical information or data.
- Undisclosed financial and accounting information.
- Strategic information concerning current and future business plans, bid or proposals, projects, ventures, acquisitions, or divestitures.
- Pricing information.
- Customer or vendor records, contracts, or business terms.
- Employee personnel records (e.g., job applications, resumes, performance evaluations and records, compensation information, notices regarding performance, termination notices, etc.).
- Information regarding Company disputes, litigation, or compliance matters.
- Research information and records.

Employees, officers and directors must not communicate, divulge or disseminate confidential information at any time during or after termination of service, with respect to directors, or termination of employment, with respect to employees and officers, except:

- To employees or agents of the Company that need the confidential information to perform their duties on behalf of the Company;
- In the performance of their respective duties to the Company; or
- As otherwise required by law or legal process.

All employees, officers and directors are required to sign a confidentiality statement. The confidentiality and non-use restrictions contained therein and within this Code of Ethics continue beyond termination of service for directors, and termination of employment for employees and officers. Upon termination, employees, officers and directors are not permitted to take, copy or retain any records or documents of the Company and may be required to certify that they have complied with, and will continue to comply with, the confidentiality and non-use restrictions and requirements.

B. Non-Disparagement

Employees, officers and directors must refrain from taking actions or making statements, written or verbal that:

- Denigrate, disparage or defame the goodwill or reputation of the Company or any of its trustees, officers, security holders, partners, agents or former or current employees, officers and directors, or
- Are intended to, or may be reasonably expected to, adversely affect the morale of the employees of the Company.

Employees, officers and directors also must not make any negative statements to third parties relating to their service or employment with the Company or any aspect of the business of the Company and not make any statements to third parties about the circumstances of the termination of service or employment, or about the Company or its trustees, directors, officers, security holders, partners, agents or former or current employees, officers and directors, except as may be required by a court or governmental body, or as otherwise required by law or legal process.

V. Proper Accounting for Company Transactions

The maintenance of accurate financial and accounting records is essential in order to enable the Company to comply with the requirements of the federal securities laws and with its obligations to its shareholders.

A. Maintenance of Accurate Records

All Company assets and liabilities and all items of revenue and expense shall be properly recorded in the Company's regular books and records in accordance with generally accepted accounting principles. All employees and officers who are responsible for the recording or reporting of Company property, assets, liabilities, transactions and other activities are required to provide full, fair, accurate, timely and understandable recording or reporting thereof. Without limitation of the foregoing:

- No undisclosed or unrecorded fund or asset of the Company shall be established or maintained for any purpose.

- No employee or officer of the Company shall intentionally conceal or fail to record or report any matter that is required to be recorded or reported.
- No employee or officer of the Company shall improperly record or report any matter, or improperly alter any record or report of any matter.

B. Documentation of Disbursement of Funds

No payment or other disbursement of Company funds shall be made without proper authorization. No approval shall be granted for the payment or other disbursement of Company funds without adequate supporting documentation. No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for a purpose other than that described by the documents supporting the payment.

VI. Improper Payments and Gifts to Third Parties

A. Improper Payments and Gifts.

Except for permitted gifts (as described below), neither the Company nor any employee, officer or director shall, either directly or indirectly, authorize or make any payment or gift of money or any other thing of value (including materials, equipment, facilities or services) to any:

- Current or prospective customer, supplier or competitor of the Company or to government officials; or
- Any director, officer, employee, general partner, stockholder or owner of a current or prospective customer, supplier or competitor,

if the purpose of the payment or the gift is to induce the current or prospective customer, supplier, competitor or government official improperly to grant or convey any benefit to, or forgo any claim against, the Company or any of its employees, officers or directors, or otherwise to influence a business or other decision of the current or prospective customer, supplier, competitor or government official.

B. Permitted Gifts

An employee, officer or director may make gifts, generally in the form of meals, entertainment or specialty advertising items, to Company customers, suppliers or other third parties engaged, or that may become engaged, in business with the Company if the gift meets all of the following criteria:

- It is consistent with customary business practices;
- It is not for an improper purpose;
- It is not in contravention of any applicable laws, rules, regulations or ethical standards; and
- Public disclosure of the full details of the gift would not cause embarrassment to the Company.

C. Bribery and Corruption

It is the Company's policy to conduct its operations ethically and in compliance with the laws of the United States and the laws of other nations in which the Company operates, including prohibitions against bribery, kickbacks and corruption. As part of its commitment to integrity and strict compliance with the U.S. Foreign Corrupt Practices Act of 1977, as amended ("FCPA"), and other anti-corruption laws, the Company has adopted a zero tolerance policy for bribery,

kickbacks or improper payments or gifts to government officials or private persons. The Company requires that all agents, intermediaries, representatives and business associates ("Intermediaries") doing business with the Company fully comply with the FCPA and all other applicable anti-corruption laws without regard to local customs in the conduct of business on the Company's behalf.

In short, we do not give, offer, or promise to give anything of value (e.g., gifts, favors, hospitality, payments, etc.) for the purpose of improperly influencing any decision. We do not use third parties / intermediaries (e.g., agents, consultants) or any other business partner to commit acts of bribery or corruption. Before giving, promising, or offering anything of value to any person, always ask yourself if what you are considering could be reasonably viewed as having an illegitimate purpose. **If yes, do not proceed.** If you are uncertain, seek guidance from Enterprise Compliance and Ethics before proceeding.

VII. Acceptance of Gifts or Other Personal Benefits

No employee, officer or director shall solicit from any supplier, customer or other person doing business, or seeking to do business, with the Company any gift of money, products or services, gratuity, loans or guarantees, or other personal benefits of any kind.

An employee, officer or director, including their family members, may accept an unsolicited gift or gratuity of nominal value or reasonable business entertainment (including recreation and attendance of sporting or cultural events) if the gift or gratuity meets all of the following criteria:

- It does not go beyond common courtesies usually associated with accepted business practices;
- It does not interfere with the recipient's independence or judgment in carrying out his or her responsibilities on behalf of the Company; and
- Public disclosure of the full details of the gift or gratuity would not cause embarrassment to the Company.

Any gifts or gratuity that do not meet these requirements must to the extent possible be returned. If you are uncertain whether a gift or gratuity meets these requirements, seek guidance from Enterprise Compliance and Ethics before proceeding.

VIII. Relationships with Customers

When dealing with customers, the Company is committed to:

- Providing all customers with exceptional service;
- Dealing fairly and ethically with all customers and treating customers with respect;
- Providing customers with accurate and clear information regarding the services offered by the Company; and
- Investigating promptly and resolving on fair terms all customer complaints and inquiries.

Each employee, officer and director has a responsibility to use his or her best efforts to ensure that these objectives are attained. The Company prohibits manipulation, misrepresentation of facts, and other forms of unfair dealing with customers.

IX. Relationships with Suppliers and Consultants

When dealing with suppliers and consultants of products and services to the Company, all employees, officers and directors are required at all times to act in the best interests of the

Company, while at the same time adhering to the highest standards of ethical conduct. All unlawful behavior, manipulation, misrepresentation of facts, or any other forms of unfair dealing are prohibited.

X. Fair Competition

The Company is committed to fair and honest competition. The Company seeks to achieve its competitive advantage through competitive prices, products and services, and not through illegal or unethical business practices. All employees, officers and directors are required to adhere to all laws and regulations regarding fair competition, including antitrust laws. Misappropriation of trade secrets or other proprietary information, manipulation, misrepresentation of facts and all other forms of unfair dealing are prohibited.

XI. Fraudulent Activity

The Company is committed to the highest standards and ethical values in all business transactions, relationships and partnerships. The Company prohibits fraudulent activity, including misappropriation of assets (theft), corruption in any form, and financial and non-financial misrepresentation. When doing business with or on behalf of the Company, it is expected that all appropriate anti-fraud processes and controls be in place prior to the performance of any service on our behalf, the Company's assets are properly safeguarded at all times, and business dealings are conducted in a manner that is honest and trustworthy. Any known or suspected internal or external misconduct must immediately be reported to the Company in the manner specified in this document.

XII. Relationships with Employees

All employees and officers are entitled to work in an environment free of discrimination and harassment. Therefore the Company strives to provide each employee and officer with a workplace that is free from unlawful discrimination or harassment. It is the policy of the Company to provide equal employment opportunity to qualified individuals regardless of race, color, religion, gender, national origin, age, sexual orientation, their status as disabled veterans or as disabled individuals, or any other category protected by applicable law. Equal opportunity applies to all aspects of the employment relationship, including recruitment, initial employment, promotion, training, wage and salary administration, seniority, retirement, employee benefits, and terms and conditions of employment.

XIII. Protection and Proper Use of Company Assets

Proper protection and proper use of Company assets is the responsibility of each employee, officer and director. Employees, officers and directors are required to promote the efficient use of Company assets and to take appropriate security measures to safeguard physical property and other assets against unauthorized use or removal, as well as against loss by wrongful acts or negligence. Employees, officers and directors may use Company property only for legitimate business purposes and strictly in accordance with established Company policies and guidelines.

XIV. Insider Trading

All employees, officers and directors are required to adhere to the Company's policy entitled "Securities Trades by Company Personnel and Related Persons", which governs trading by employees, officers and directors in Chesapeake stock.

XV. Political Activities

Employees, officers and directors are free to participate in lawful political activities on their

own time and at their own expense, and to make personal contributions to political parties, committees or candidates of their choice. However, under no circumstances shall an employee, officer or director use Company facilities or assets, or be compensated or reimbursed by the Company, for their personal political activities or contributions.

While employees and officers are encouraged to participate in civic and community activities during their non-work hours, an employee's or officer's determination to seek election or appointment to public office, including membership on a public board or commission ("public office"), raises special concerns. Because the Company's business frequently interfaces with many government branches, employees, officers and directors would have a responsibility to disqualify themselves from any action in which they know the Company has an interest. In addition, care must be taken that campaigning for office or fulfilling public responsibilities is not done during work hours. Accordingly, any employee or officer who wishes to seek or accept public office must provide Enterprise Compliance and Ethics with reasonable advance notice of that intent. In certain cases, depending on the nature of the office and other surrounding circumstances, the Company may decide that the employee or officer should not seek or accept such office while remaining in the Company's employment without a determination by the Company's Chief Executive Officer (or in the case of the Chief Executive Officer, the Board of Directors) that such activities will be consistent with Company policies and applicable laws and standards.

In addition, lobbying activities by employees, officers and directors may require disclosure to government agencies. Lobbying activities include, but are not limited to, contacting legislators, regulators, government officials, and their respective staff members on matters relating to the business of the Company or its affiliates, as well as any other efforts generally intended to influence legislation or administrative action. Accordingly, employees, officers and directors must consult with the Company's General Counsel and Senior Vice President, Strategic Development before undertaking any lobbying activities on behalf or related to the business of the Company or its affiliates.

XVI. Certain Communications with Third-Parties

It is the Company's policy to comply with all applicable laws and to cooperate with any reasonable and lawful requests made in a government investigation. All employees, officers and directors must immediately notify the Company's General Counsel if they receive an inquiry, subpoena, or other legal document regarding the Company or any of its affiliates or its respective businesses from any governmental agency. Employees, officers and directors must also immediately notify the Company's General Counsel if any communications are received from lawyers concerning a dispute with the Company or any of the Company's affiliates or any of its respective employees, officers, directors, suppliers, contractors, vendors, partners, customers, or competitors. In addition, employees, officers and directors should consult with the Company's General Counsel before producing any documents, submitting to an interview, answering questions, or responding to any request regarding litigation or a government investigation concerning the Company or any of its affiliates or its respective business.

Following termination of service or employment with the Company, employees, officers and directors shall continue to cooperate with the Company during the course of all third-party proceedings, which includes internal investigations, administrative investigations, governmental investigations, or proceedings and lawsuits, arising out of the Company's business about which the former employee, officer, or director has knowledge or information or is otherwise required by a subpoena or other legal process to cooperate.

Former employees, officers and directors must not communicate with, or give statements to, any member of the media (including print, television, electronic, or radio media) relating to any matter (including pending or threatened lawsuits or administrative investigations) about which

they have knowledge or information as a result of service or employment with the Company.

XVII. Compliance Procedures

A. Distribution of this Code of Ethics

A copy of this Code of Ethics shall be furnished to each employee, officer, director and director nominee of the Company and shall be posted on the Company's website (www.chpk.com). Company officers are required to ensure that all Company personnel in the departments for which they are responsible receive a copy.

Any employee who has a question concerning the interpretation or application of any provision of this Code of Ethics should consult his or her immediate manager, who may, if necessary, refer the question to the Head of Internal Audit, Enterprise Compliance and Ethics, or an appropriate Company official. Alternatively, any employee, officer or director may contact the Head of Internal Audit directly.

B. Reporting Violations

Any employee or officer who has knowledge of a violation by the Company or any employee, officer or director of any law, rule or regulation or this Code of Ethics, or suspects that such a violation has occurred, is required to report the matter to an independent third party via a dedicated toll-free hotline or the Company's secure EthicsPoint website at www.chpk.ethicspoint.com, or in written form directly to the Head of Internal Audit in accordance with the process set forth on the Company's website (www.chpk.com). All concerns will be investigated under the direction of the Chair of the Audit Committee.

The Company will make every effort, within the limits allowed by law, to keep confidential the identity of anyone requesting guidance or reporting a violation or suspected violation. However, it may not be possible to maintain the confidentiality of the reporting person or the reported information if (i) disclosure is necessary to enable the Company or law enforcement officials to investigate the matter, (ii) disclosure is required by law or (iii) the person accused of a violation is entitled to the information as a matter of legal right. All employees, officers and directors are expected to cooperate, to the extent requested, in any investigation of any violation of any law, rule or regulation or this Code of Ethics.

No adverse action will be taken against any person who in good faith reports a violation, or a suspected violation, raises a concern, seeks guidance, or participates in an investigation regarding a potential violation of any law, rule or regulation or this Code of Ethics. Any such retaliation is also a violation of this Code of Ethics and will be grounds for disciplinary action against the person or persons who engage in retaliation, up to and including termination of employment. Any employee, officer or director who believes that he or she has been retaliated against may file a complaint with the Head of Internal Audit, who shall be responsible for the investigation of the matter.

C. Violations

Any employee, officer or director who fails to comply with any applicable law, rule, or regulation or with this Code of Ethics is subject to disciplinary action, which could include, without limitation, a reprimand, probation, suspension, reduction in salary, demotion or dismissal — depending upon the seriousness of the offense.

XVIII. Amendments and Waivers

The Board of Directors must approve any amendment to this Code of Ethics. No waivers or exceptions to this Code of Ethics are anticipated; however, any waiver of any provision to this Code of Ethics for employees, other than executive officers, requires the approval of the Chief Executive Officer. Any waiver involving an executive officer or director requires the approval of the Board of Directors or a designated Board Committee and must be promptly disclosed to shareholders within four business days of such determination by website disclosure or as otherwise required by the applicable rules and regulations of the Securities and Exchange Commission and the New York Stock Exchange.

We strive to conform to ADA guidelines to ensure accessibility for all users.
If you experience issues, please contact us at accessibility@chpk.com for assistance.