

WHISTLEBLOWER POLICY

SJW Group and its subsidiaries (“SJW”) expect ethical and legal conduct from all of its officers, directors and employees. Any employee, officer or director who believes that there has been conduct which is or might be a violation of law or SJW’s Code of Ethical Business Conduct (“Code of Ethics”), including any questionable accounting or auditing matters, should bring the matter to the attention of his or her immediate supervisor, Suzy Papazian, General Counsel and Corporate Secretary of SJW, or James P. Lynch, Chief Financial Officer and Treasurer of SJW, if appropriate. Employees, officers and directors should also feel free to report any violation to Douglas R. King, the Chair of the Audit Committee by calling SJW’s toll free hotline. SJW’s reputation is extremely important, and all reported violations will be carefully investigated and appropriate action taken.

Retaliation against an employee who in good faith reports truthful information about a violation of law or the Code of Ethics is prohibited. If a reporting employee wishes to disclose his or her identity, the employee may do so. Confidentiality of the employee submitting the report will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation.

If you are concerned about being identified as a whistleblower, you may report a violation of law or the Code of Ethics, including any questionable accounting or auditing matter, on a confidential and anonymous basis by calling SJW’s toll free hotline. The toll free hotline is 1-888-883-1499. Please include enough information so that the matter can be adequately investigated, or a method by which the Chair of the Audit Committee can contact you for further details.

In addition, the office of the Attorney General for the State of California maintains a whistleblower hotline to receive calls from persons who have information regarding possible violations of state or federal statutes, rules or regulations, or violations of fiduciary responsibility by a corporation to its shareholders, investors or employees. The Attorney General will refer calls received on the whistleblower hotline to the appropriate government authority for review and possible investigation. During the initial review, the Attorney General or appropriate government agency is required to hold in confidence information disclosed through the whistleblower hotline, including the identity of the caller disclosing the information and the employer identified by the caller. The Attorney General's Whistleblower Hotline is 800-952-5225 (for California residents) or 916-322-3360 (for out-of-state residents). Written complaints may be filed with the Attorney General's Office by writing to P.O. Box 944255, Sacramento, CA 94244-2550, or by using the online form available at <http://oag.ca.gov/consumers/general>.