

POWERING OUR VALUES

SUPPLIER CODE OF CONDUCT

ROBERT GAUDETTE
PRESIDENT AND CEO



To our valued suppliers and partners,

At NRG, our suppliers are an extension of our team. The way you operate reflects on us, and the way we work together shapes the outcomes we deliver for our customers and the communities we serve. This Supplier Code of Conduct defines the standards we hold ourselves to — and the standards we expect from every supplier, agent, contractor, and consultant who works with us.

Leadership is accountable. That applies to how we engage with our suppliers and how we expect our suppliers to lead within their own organizations. Together, we drive velocity, accelerate execution, and operate as one team in pursuit of meaningful results. Building high-performing organizations requires partners who share our commitment to doing the work the right way.

Our values — *Do What's Right, Win Together, Wow Them, Stay Curious, Be Direct, and Bring Passion* — are non-negotiable. We ask our suppliers to reflect these same principles in how they conduct business: acting with integrity, building trust, respecting their colleagues and ours, and modeling our values every day. When we empower teams on both sides of the partnership to do great work, we create lasting value for everyone we serve.

We also recognize that talent is a strategic advantage, and professional growth is a priority. We look for suppliers who invest in their people, prioritize safety and well-being, and hold themselves accountable to the same high standards we set for ourselves.

If you ever have a question or need to report a concern, please contact the NRG Ethics Helpline at 888.263.0463 or the NRG Ethics Alertline at nrg.alertline.com, where reporting can be completely confidential and anonymous.

Thank you for partnering with us, for leading by example, and for helping us build a stronger, brighter future together.



Robert Gaudette

President and Chief Executive Officer, NRG



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At NRG, we're on a journey to change the energy industry so that we and future generations can live in a smarter, more sustainable world. We need to work as a single team with unified, exemplary standards for how we make decisions and conduct our business.

OUR POWER VALUES

Safety and well-being

Customer focus

Collaboration

Accountability

Diversity, equity, and inclusion

Our Power Values underlie our ethical decision making and are the foundation of our culture.

This Code of Conduct is a field guide for the NRG journey, translating our values into the standards of behavior we expect from one another. It also provides guidance on solving problems, finding answers, and communicating concerns, and it covers not only all of us who work at NRG, but also our contractors, consultants, and agents. In addition, we expect all of the companies that we do business to share, respect, and act consistently with our Code.

The Code does not cover every workplace situation, nor does it substitute for sound judgment. However, it does outline our key responsibilities and the guiding principles intended to support ethical and socially responsible behavior and choices. Suppliers are responsible for maintaining and enforcing written policies requiring adherence to lawful business practices and ethical conduct consistent with our Power Values for both their employees and their subcontractors.

It is vital to understand that violating this Code could result in termination as an NRG supplier, including associated contracts, and in legal action. In addition, NRG reserves the right to conduct an audit to confirm suppliers' compliance to this Code.



NRG ETHICS HELPLINE AND ALERTLINE

Suppliers are responsible for ensuring that their employees and sub-contractors understand and comply with these standards. Suppliers may require their subcontractors to comply with this Code by insertion of these requirements in any sub-contract pursuant to any goods and/or services to be provided, as outlined in the NRG purchase order.

In rare cases, applying a Code provision or NRG policy may not seem like the right thing to do. If you're unsure, please contact your NRG site representative, the NRG Ethics Helpline, or the NRG Ethics Alertline.

OUR COMMITMENT TO EACH OTHER

The strength of NRG depends on our promise to each other to live our Power Values as we go about the tasks of fulfilling our mission and acting as stewards for our shareholders. That promise is reflected in this Code and when NRG and its suppliers are guided by the Code we ensure:

- An ethical business culture consistent with our Power Values
- Compliance with applicable laws and regulations, as well as this Code
- A safe, fair, and respectful workplace
- A positive work environment free of harassment, bullying, and intimidation
- Decisions are made in the best interests of NRG, without personal conflicts or bias
- Confidence that reports of all kinds, made in good faith, will be taken seriously, investigated appropriately, and those reporting will not face retaliation

STANDING UP AND SPEAKING OUT

At NRG, we depend on each other, including our suppliers to speak out when they have a question, suggestion, or concern. Our safety, integrity, and success depend on each of us having the courage and commitment to make our voices heard. It's equally important that when others speak out, we listen carefully with an open mind. If you have a question or concern, please contact your NRG site representative, the NRG Ethics Helpline, or Alertline.

WARNING: RETALIATION PROHIBITED

Retaliation of any kind against someone making a report that he or she believes to be true — which NRG calls reporting in good faith — is not tolerated. Doing so would be contrary to our Power Values and prevent NRG from building a "speak out" culture. If you see, suspect, or are subject to retaliation for speaking out, please contact the NRG Ethics Helpline or Alertline. Of course, acting with accountability requires that we make all of our reports in good faith. Knowingly making a false report or failing to report a suspected violation may result in termination as an NRG supplier, including any associated contracts.

ASSISTING IN INVESTIGATIONS

NRG operates in a complex, highly-regulated environment, subject to oversight, rules, and regulations by a wide range of government agencies, industry organizations, and energy exchanges. For NRG to succeed in that environment and maintain our reputation for integrity, it is crucial for each of us, including our suppliers, to understand our responsibility to participate fully and honestly in any audit, investigation or inquiry, when asked to do so by NRG. In addition, NRG and its suppliers are accountable for obeying all of these rules and regulations, reporting actual or suspected non-compliance, and cooperating in audits, investigations, and appropriate requests for information.

If you receive a notice from the NRG Legal Department or from Corporate Compliance asking you to locate or retain documents or records of any kind, you'll need to do so without hesitation. This applies even if you haven't received such a notice, but have reason to believe that documents or records you have or control may relate to a dispute, investigation, or potential litigation. Suppliers have an obligation to never alter, delete, destroy, or hide records.

If you receive a non-routine request for information from a government or regulatory agency directed to NRG, bring it to your NRG site representative, the NRG Legal Department, or Corporate Compliance immediately. Only our legal department is authorized to respond to or accept the service of legal papers (such as subpoenas) on our company's behalf.

For more information, see the section on *Market manipulation and regulation* on page 16.



Providing a safe and injury-free environment that encourages wellness for every employee is the first and most fundamental of our Power Values.

LEADING THE PACK

NRG embraces Safety and Well-Being with an ultimate goal of zero injuries, driven by a focus on preventative safety practices, and a commitment to returning everyone home to their loved ones every day. We all share a responsibility to keep each other and our operations safe. We foster a culture where everyone feels safe and secure. If you notice unsafe conditions or see a potential problem, stop what you're doing and warn others. Supplier personnel should notify their company's management and an NRG site representative as soon as possible. By reporting problems immediately, we significantly reduce the risk of accident, injury, and illness.

RULE NO. 1: If it isn't safe, don't do it.

To ensure the health and safety of all:

- Watch for any unsafe or potentially unsafe situation and report it immediately
- Keep public safety at the forefront
- Participate in all NRG safety program training and activities
- Understand and comply with all safety and health laws, and related company rules and regulations
- Use and wear required safety and personal protective equipment and clothing, and make sure others do as well
- Maintain facilities and equipment in a safe condition
- Stop any activity that puts the health or safety of others at risk

If a safety incident occurs on-site, suppliers are required to notify their company's management and their NRG site representative. For additional NRG safety information, contact your NRG site representative.

REPORTING FOR DUTY

Physical and mental health are crucial to our ability to do our jobs effectively. NRG and its suppliers can help make our workplace safe and productive by:

- Always reporting to work free from the influence of alcohol or illegal drugs
- Never using, possessing, selling, or distributing illegal drugs on NRG property or while conducting NRG business on or off NRG property
- Allowing our colleagues to make mistakes and express themselves without fear of negative consequences

Suppliers may not use, possess, sell, distribute, or be under the influence of illegal drugs and/or alcohol on NRG property or while conducting business on behalf of NRG, whether on or off NRG property.

The use of legally prescribed drugs or over-the-counter medications is permitted on the job as long as it does not affect an individual's ability to perform their job safely and effectively. If there is concern, speak up and tell your NRG site representative or contact the NRG Ethics Helpline or Alertline.

WORKING TO KEEP THE OUTDOORS GREAT

NRG is committed to making the world a better place. That begins with our strategic efforts to consider sustainability in everything we do. This includes innovating products and services to serve our customers in their energy efficiency efforts and their sustainability journey, repowering our conventional generation fleet, and seeking creative ways to capture and use carbon emissions. NRG respects our neighbors and their communities and strives to keep them safe by operating in ways that meet or exceed all applicable environmental laws and regulations. NRG takes our environmental responsibilities seriously because we know it's the right thing to do — for ourselves, our neighbors, and future generations. NRG expects the same from our suppliers.

For more information, see the section on *Sustainability* on page 17.

WHERE CAN I REPORT A SAFETY OR ENVIRONMENTAL CONCERN?

- Your NRG site representative
- NRG Ethics Helpline or Alertline

CONFLICT MINERALS

Suppliers shall not manufacture or subcontract for the manufacture of any products for which conflict minerals are necessary to the functionality or production of that product. "Conflict minerals" means minerals such as cassiterite, columbite-tantalite, gold, and wolframite, derivatives of these minerals (including tin, tantalum, and tungsten) and other minerals that the U.S. Secretary of State may designate from time to time that are sourced from a mine located in the Democratic Republic of Congo, Congolese, or an adjoining country.



In our complex business, it's essential to understand and deliver compelling energy solutions that meet current and future customer needs.

CONFLICTS OF INTEREST

It is important to make business decisions based upon the best interest of NRG, not personal consideration. A conflict of interest occurs when a supplier's duties or his/her position present an opportunity for personal gain or when personal interests could influence professional judgment for doing what is in the best interest of NRG. This includes (but is not limited to) providing or offering an NRG employee something of value in return for getting NRG work or having an association or relationship that could affect impartiality in business decisions. The requirement to avoid conflicts of interest also applies to situations involving both NRG employees and their family members.

It's important to recognize conflicts of interest and to disclose them when they occur or have the potential to occur. Conflicts of interest harm NRG because those involved aren't working toward the same goals, and they can undermine our confidence in one another or create the appearance of unfairness in the workplace.

The best way to avoid conflicts of interest is with timely, complete, and honest disclosure to your company's management and your NRG site representative. Approval from our chief compliance officer may be necessary in certain situations.

DATA PRIVACY

In the course of work, suppliers may often have access to non-public, confidential information regarding NRG, its employees, customers, and other third parties. The unauthorized use or release of such information could harm NRG and potentially violate the law. Suppliers have a responsibility to keep this information safe and secure.

Employee, customer, and other third-party confidential information includes, but is not limited to NRG, its customers, employees, competitive data, and intellectual property, which generally refers to:

- Contact information including name, email, and/or phone numbers
- Health and insurance information
- Credit card information
- Social Security numbers
- Driver's license or government-issued identification numbers
- NRG documents
- Banking information
- Salary and benefit details
- Date of birth
- Mother's maiden name
- Contracts

POLITICAL PROCESS

GOVERNMENT RELATIONS

As an industry leader and committed corporate citizen, NRG regularly keeps government and regulatory officials informed about our operations, products, and services. Exemplary leadership in government relations means we're proud of our work, excited to share our positions, and eager to shape the discourse. Those of us responsible for contact with these officials understand and comply with the laws and rules governing lobbying and corporate political activity. Contact with government officials regarding NRG business should be handled only by authorized NRG personnel.

POLITICAL CONTRIBUTIONS

NRG is committed to complying with all applicable laws and regulations governing political activities and communications. In certain limited circumstances, NRG may contribute to federal, state, or local candidates. However, contributions to any political party, candidate, or campaign (including hosting a site visit or other public event) must be permissible under applicable law. Without written consent from NRG, a supplier shall not give any gifts on behalf of NRG to public officials or any employee or representative of any governmental entity.

POLITICAL PARTICIPATION

We're all free to participate in the civic and political activities of our communities. When we do, we must make clear that we are speaking and acting as individuals — not on behalf of NRG. Suppliers shall not be involved in any political activity as a representative of NRG or use the NRG name to participate in political activities without written consent from NRG. Suppliers shall not use the company's computer systems, email addresses, or other property to express personal political views or to benefit a political candidate or campaign.



Work together across the organization as one team focused on delivering value for our stakeholders.

PROTECTING ASSETS

Suppliers who utilize NRG assets have a responsibility to ensure that they keep them safe and use them efficiently. Assets include all equipment, materials, systems, records, buildings, real estate, vehicles, plans, and intellectual property — everything NRG owns or leases or is entitled to. NRG assets are to be used by suppliers for business purposes only. Whether it's a phone, laptop, data sheet, or vehicle, NRG assets are to be treated with care — guarding against waste, damage, and theft. Suppliers shall not remove, duplicate, re-create, destroy, publish, sell, or give away NRG assets.

MAXIMIZING CORPORATE OPPORTUNITIES

In the course of performing work for NRG, suppliers may occasionally discover valuable business opportunities. Because these opportunities belong to NRG, suppliers shall present them promptly to their NRG site representative so that NRG can evaluate them.

CONFIDENTIAL AND PROPRIETARY INFORMATION

At NRG, we're constantly creating value through the inventions, innovations, and improvements that become corporate assets. These assets are the future of NRG, and our success depends on keeping them confidential. These include our intellectual property, trade secrets, patents, registered and unregistered copyrights, trademarks, service marks, ideas, and inventions.

Much of our proprietary information is confidential, meaning it's not available to the public. This includes:

- Unreleased financial results and data
- Undisclosed intellectual property (such as inventions, software, designs, process improvements, and other trade secrets not submitted for patent, trademark, or copyright protection)
- Strategic and marketing plans
- Supplier lists and bills of materials
- Non-public and draft bids, responses, and proposals

Suppliers who have access to confidential information must strictly protect the confidentiality of such information. Confidential and personal information should only be used for the purposes for which it was collected, kept secure at all times, and disclosed only when authorized or legally mandated. It may never be used for personal gain or for the unauthorized benefit of persons outside NRG.

Except as explicitly provided otherwise in any written agreements between supplier and NRG, all copyrights, patents, trade secrets, or other intellectual property associated with every idea, concept, technique, invention, process, and work of authorship developed or created by the supplier, individually or jointly with others, in the course of performing work for NRG, or that are based on or derived from NRG confidential information or NRG property to which supplier has access to, belongs to NRG and, if requested, shall be specifically assigned by the supplier to NRG.

In our increasingly interconnected digital world, the risk of losing valuable information is significant and growing. The loss or theft of a laptop, smartphone, or even a thumb drive can lead to a massive data breach, damage to our hard-won competitive advantage, and significant financial impact. Unless specifically authorized to do so, suppliers shall never download or transfer confidential or proprietary data to portable or personal devices. If authorized, make sure to encrypt the download properly and that the device is protected.

NRG transfers confidential or proprietary information to third parties only when we have a signed non-disclosure agreement approved by the NRG Legal Department. NRG protects information received from suppliers under a non-disclosure agreement as carefully as we protect our own.

Each supplier must notify their NRG site representative immediately if any confidential information has been released without authorization. The obligation to protect confidential information continues even after the supplier's work is completed.

ACCURATE RECORDING AND REPORTING

Accurate books and records are critical to making sound business decisions and the ability of NRG to meet compliance, legal, financial, and management obligations. NRG is committed to full, fair, accurate, timely, and understandable disclosure in all public reports and communications, including all documents that NRG files with, or furnishes to, the Securities and Exchange Commission (SEC).

Each supplier should keep accurate and complete business records that show all transactions in reasonable detail and prohibit all attempts to create false or misleading records or to deviate from established accounting procedures. This includes all forms of reports and records.

Therefore, suppliers must record and report all financial and other information related to their work for NRG accurately, honestly, objectively, and in a timely manner. Suppliers must not hide, alter, falsify, or disguise the true nature of any transaction for anything involving NRG. They should not take or fail to take any step that could impair NRG from complying with these requirements.

The commitment of NRG to maintain accurate books and records requires that suppliers accept orders only when accompanied by an approved NRG purchase order or credit card. Failure to comply with the requirement may impact the ability of NRG to pay for the goods and/or services in a timely manner.

RECORDS RETENTION

Various federal and state laws govern requirements for retaining records. Suppliers have an obligation to prevent the destruction of documents related to an investigation, claim, or lawsuit. Records retention applies to all records created, electronic or hard-copy.

Because the loss or destruction of records related to investigations or lawsuits can have very significant consequences on NRG and its suppliers, "legal holds" must be followed carefully as soon as they are received. If you are unsure of what's required, or become aware of a subpoena, pending or contemplated litigation, or governmental investigation, notify the NRG Legal Department immediately.

PUBLIC COMMUNICATIONS AND MEDIA INQUIRIES

NRG and its suppliers have a responsibility to protect our reputation and confidential information when communicating with the public. To ensure that NRG public communications are accurate, complete, and in compliance with applicable law and internal policy, no supplier or independent contractor is permitted to speak publicly on our behalf nor are they permitted to respond to inquiries from news media, securities analysts, or investors.

SOCIAL MEDIA

When used wisely, social media helps NRG connect with our customers and spread the word about our products and services. However, because content on social media is usually not subject to prior internal review, moves quickly and unpredictably, and is impossible to retract or delete, suppliers shall not post on blogs or other online forums anything related to NRG business, unless specifically authorized to do so by NRG. Suppliers are to act with integrity and not publish, post, or disclose proprietary or other confidential information. Also, they should avoid commenting on NRG customers and business relationships and shall not threaten or harass NRG employees or share their personal information without their permission.

Remember, contact your NRG site representative, the NRG Ethics Helpline or Alertline if you have any concerns about any information shared on social media.



Act with integrity and always do the right thing for our people, customers, communities, and the environment.

GIFTS

Giving and receiving small gifts and sharing reasonable meals and appropriate entertainment are ways to connect with NRG employees and deepen business relationships. Accountability requires that NRG never accepts gifts, entertainment, or other favors that are, or may appear to be, intended to influence the business decisions of those receiving them. NRG employees are not authorized to accept gifts, entertainment, employment of family, or other favors from suppliers that could influence or appear to influence the NRG employee to grant an unfair competitive advantage or to motivate the NRG employee to do anything unethical, illegal, or prohibited by NRG policy. There must not be any explicit or implicit suggestion of a "quid pro quo." Approval for giving or accepting gifts must be submitted to the NRG Corporate Compliance Department prior to the exchange.

BRIBERY, KICKBACKS, AND CORRUPTION

At NRG, we don't engage in bribery, kickbacks, corruption, or anything that looks even remotely like them. We're scrupulous in our business dealings and even more careful in our interactions with public or government officials. NRG is committed to complying with all applicable laws and regulations governing political activities and communications, including accurate reporting of lobbying activities, campaign contributions, and gifts to public officials. NRG suppliers and anyone else acting on our behalf shall meet these same high standards.

Corruption in all its forms has serious legal consequences for the companies and individuals who become involved. More importantly, it is terribly destructive and can distort markets, drag down economic development, and wreak havoc on local communities. That's why NRG knows and abides by applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA). NRG complies with the letter and spirit of the law and expects the same from our suppliers.

NRG does not condone the payment or receipt of any bribe, kickback, or other similar unlawful payment to or from a public or government official or any other individual, foreign or domestic, to secure business or gain advantage for NRG. This includes payments of money or anything else of value to or by NRG suppliers acting on behalf of NRG.

Suppliers shall not give any gifts on behalf of NRG to public officials, or officials of any agency or court that regulates our business, or with whom a matter is pending, without prior written consent from our chief compliance officer and legal department.

Where differences exist between this Code's guidelines and local, state, or federal laws and regulations, the supplier must apply the strictest standard.

KEEPING YOUR DISTANCE FROM DECISION MAKERS

In the course of our work, NRG frequently communicates with judges, government employees, and regulators who decide on the permits, applications, bids, contracts, rules, and rates that affect our business. Suppliers may not be involved in any political activity as a representative of NRG or use the NRG name to participate in political activities without express written consent from the NRG Legal Department. Also, suppliers shall not use NRG property, including computer systems and email addresses, for the benefit of political candidates or their campaigns, or express personal views on political issues.

FAIR DEALING

Suppliers are expected not to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. In order to compete fairly and to avoid even the appearance of improper agreements and understandings, suppliers shall act in accordance with applicable laws and accepted ethical industry practices regarding gathering competitive data.

COMPETITION AND ANTITRUST

NRG is committed to competing lawfully based upon the merits of our products and services. Suppliers shall fully comply with the applicable antitrust and competition laws everywhere they engage in business on our behalf, whether or not anyone is watching. These laws vary from country to country, but in general, they protect consumers by prohibiting competitors from acting together for the purpose of controlling prices or reducing competition. Prohibited activities include:

- Price-fixing and bid-rigging
- Agreements with competitors not to deal with a customer or supplier
- Agreements with competitors to limit production
- Misrepresentations, including false or misleading advertising, regarding our own or a competitor's product or service

Suppliers working on our behalf shall not engage in anti-competitive practices that could violate those laws or harm our business or reputation.

COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers shall comply with all applicable policies, laws, rules, and regulations while on NRG premises or while conducting business elsewhere on behalf of NRG, and must promptly report any known or suspected violations. In addition, suppliers must comply with the Fair Credit Reporting Act (FCRA) and relevant state and federal laws regarding credit applications and consumer privacy. Suppliers may only conduct credit checks for legitimate business purposes, such as obtaining a credit report pursuant to written authorization from the customer or for transactions initiated by the customer. Suppliers are responsible for the actions of their employees and subcontractors to ensure that they are:

- Trained, fully informed, and follow the laws, rules, regulations, and NRG policies that are applicable to the work performed
- Properly supervised to ensure compliance with laws and regulations
- Not assigned to NRG work if the supplier has any reason to believe that it may create non-compliance with this Code

MARKET MANIPULATION AND REGULATION

When it comes to selling power, NRG has compliance obligations under the rules of the Commodities Futures Trading Commission, the Federal Energy Regulatory Commission, the North American Electric Reliability Corporation, the relevant independent systems operators, and many others. NRG and their suppliers are accountable for obeying all these regulations, reporting actual or suspected noncompliance, and cooperating in audits, investigations, and appropriate requests for information. Compliance with the market manipulation rules of these agencies, as well as those of the other organizations and exchanges, is the integrity, reputation, and success of NRG and our suppliers.

Market manipulation rules prohibit actions or transactions that have no legitimate business purpose and are meant to — or reasonably could — manipulate market prices, conditions, or rules for electric energy or electricity products. Examples include wash trades, transactions based on the provision of false or misleading information, and artificially created congestion.

Suppliers should be familiar with the legal and regulatory requirements associated with the work they performed for NRG. Contact the NRG Legal Department for assistance.

INSIDER TRADING

Many of us, including some NRG suppliers, have access to information that, if made public, might affect the share price of NRG or other publicly traded companies, including our suppliers, customers, and potential merger and acquisition targets. This is "material non-public information" and NRG suppliers have a legal and ethical duty not to disclose it to anyone. It's against the law to trade in the stock (or other securities) of NRG or any company while suppliers have material, non-public information regarding NRG, or regarding developments that could affect NRG or any other company, or to provide that information to anyone else for them to trade based on it.

INTERNATIONAL TRADE

Whenever NRG or our suppliers do business of any kind across national borders, we shall comply with the laws of both the U.S. and the other countries involved relating to shipping goods, conducting financial transactions, transferring or sharing data or technical information, providing services, or otherwise operating across national borders. The U.S. government restricts trade with certain countries, companies, and people to prevent nuclear proliferation, to battle terrorism and the global narcotics trade, and to impose political sanctions. NRG and their suppliers shall abide by these restrictions.

HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

NRG is committed to supporting, respecting, and protecting human rights—both in our own business activities and in our business relationships with other parties, especially in the context of our contract manufacturing activities. NRG requires all suppliers, including subcontractors, to comply with applicable laws and regulations regarding human rights in all locations in which we operate and adhere to the principles of the United Nations Global Compact and the Universal Declaration of Human Rights. Suppliers who employ subcontractors shall require and verify that these standards are upheld by their subcontractors.

USE OF NRG INFORMATION TECHNOLOGY (IT) SYSTEMS

NRG IT systems, including our telephone, email, computer systems, intranet, and internet, are company property and critical to the process of creating value. Suppliers may utilize NRG IT systems to perform their work. Suppliers must use IT equipment and network systems responsibly and primarily for the business purpose for which they are intended. NRG IT equipment and the messages, data, files, and software stored or transmitted on NRG IT systems are NRG property. They may be monitored or reviewed for any reason, business purpose or concern, including compliance with applicable licenses, laws, regulations, and NRG policies. Suppliers shall not place any information acquired from NRG IT systems in any other location or non-NRG system without written approval from NRG. Also, suppliers shall have no expectation of privacy on the NRG network.

SUSTAINABILITY

NRG Energy is a leading energy and home services company powered by people and our passion for a smarter, cleaner, and more connected future. A Fortune 500 company operating in the United States and Canada, NRG delivers innovative solutions that help people, organizations, and businesses achieve their goals while also advocating for competitive energy markets and customer choice.

NRG seeks suppliers who integrate principles of sustainable development into all areas of their business. NRG always strives to act in an ethical, transparent, and responsible way and we expect our suppliers as well as their subcontractors to do the same.

For more information, visit the Sustainability section at **nrg.com**.

DISHONESTY AND THEFT

Suppliers are responsible for safeguarding NRG property and for using such resources for only legitimate business purposes to advance the interests of NRG. Our assets may not be used for personal purposes. Suppliers, their employees, and subcontractors shall not knowingly or willingly:

- Engage in theft, fraud, or embezzlement affecting NRG property, funds, securities, or other assets of NRG, our employees, and customers
- Damage or destroy property or materials belonging to NRG, our employees, or customers
- Divert electric energy, natural gas, or any other products produced or owned by NRG, or service provided by NRG for personal gain
- Either sell or provide NRG resources or services
- Remove NRG equipment, property, material, or money from its premises, its employees, or customers without authorization
- Remove, publish, destroy, or alter physical and electronic NRG records
- Copy, reprint, duplicate, or re-create in whole or in part computer programs or related systems developed or modified by NRG personnel or acquired from outside suppliers



Our purpose is to be a place of inclusion where every voice matters, celebrating our differences, and championing our diversity.

DIVERSITY AND EQUAL OPPORTUNITY IN EMPLOYMENT

A diverse workforce is a strength. Therefore, suppliers should provide equal opportunity to all and employment decisions shall not be based on an individual's:

- Race
- Color
- Religion
- National origin
- Genetic information
- Gender, gender identity, or gender expression

Contact the NRG Ethics Helpline or Alertline if discrimination in hiring, promotion, transfer, training, layoff, termination, or compensation and benefits is experienced or witnessed. Speaking out about discrimination is a matter of living our Power Values. NRG will not tolerate retaliation against suppliers who report discrimination in good faith.

FAIR EMPLOYENT PRACTICES

Fair employment practices do more than keep NRG in compliance with applicable labor and employment laws. They contribute to a culture of respect. NRG is committed to complying with all applicable laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages, and hours, as well as laws prohibiting forced, compulsory and child labor, and employment discrimination. NRG requires the same commitment from all of our suppliers, including their employees and subcontractors while working on NRG property or elsewhere on behalf of NRG. Beyond legal compliance, we strive to create an environment considerate of all employees wherever NRG conducts business.

Suppliers should respect the basic human rights of employees. Employees shall not be forced to work against their will. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Forced, involuntary prison labor, slavery, or human trafficking is prohibited.

Some suppliers may be required to ensure background checks--in accordance with NRG requirements--are conducted on their employees and their subcontractor's employees. NRG will notify the supplier if such checks are required.

KEEPING NRG HARASSMENT FREE

Our Power Values help ensure a safe, positive, professional work environment. Eliminating harassment and bullying allows everyone at NRG to thrive. Harassment is speech, behavior, or conduct that creates an intimidating, hostile, or offensive work environment. It includes limiting someone's performance or potential, based on that person's race, color, religion, national origin, ancestry, gender, gender identity, gender expression, genetic information, sexual orientation, marital status, family status, age, physical or mental disability, veteran or military status, or other protected characteristic. Even conduct intended as a joke or a compliment can be taken as harassment because it's the recipient's perception of the situation, not the intention of the person who created it, that counts. Harassment by anyone (including, but not limited to, employees, supervisors, and suppliers) is prohibited and should be reported if you become aware of it.

Behaviors to avoid include:

- Unwanted physical contact or sexual advances
- Offensive comments about an individual's appearance, religion, ethnicity, or sexual orientation, or any other protected characteristic
- Inappropriate, sexually explicit, or offensive jokes or language
- Making hiring, continued employment, or positive evaluations dependent on the performance of sexual favors or the receipt of romantic attention
- Retaliation for reporting harassment, or threatening to report harassment

Just as there is no place at NRG for harassment there is also no room for bullying. We do not tolerate or engage in bullying, including physical or verbal abuse, intimidation or threats, aggressive behavior, teasing, or practical jokes.

Suppliers, their assigned employees, and subcontractors performing work on behalf of NRG will not initiate or take part in any form of harassment or bullying. NRG will not tolerate from its suppliers any form of harassment or abuse toward NRG employees or others. This prohibition includes but is not limited to comments, emails, or other communications that contribute to an offensive work environment.

Contact the NRG Ethics Helpline or Alertline, if harassment or bullying is experienced or witnessed. Complaints will be objectively investigated and where appropriate, remedial measures will be taken. By holding fast to our Power Values, such situations can be avoided.

WORKPLACE VIOLENCE PREVENTION

We are committed to keeping every NRG facility a safe and positive workplace, free of violence and threats. Physical or verbal intimidation, coercion, or violence of any kind, in any aspect of our business, is not tolerated. Suppliers shall not bring weapons or other dangerous or hazardous devices onto NRG property or into NRG vehicles.

If workplace violence is witnessed, there is potential for violence, or you feel anyone's safety is at risk, ensure your own safety first and then call 911 or other emergency services as appropriate.



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