



THE POWER TO BECOME

NRG CODE OF CONDUCT





WE BECOME PURPOSEFUL WHEN WE FOCUS ON OUR WHY

We bring the power of energy to people and organizations. That’s our Why, the purpose that brings urgency and meaning to the work we do every day. It aligns our focus on promoting peace of mind and progress in homes and businesses across North America. The Power to Become, NRG’s Code of Conduct, helps us achieve our purpose by guiding our choices and behaviors along the way.

**SAFETY AND WELL-BEING | CUSTOMER-FOCUS | COLLABORATION
ACCOUNTABILITY | DIVERSITY, EQUITY, & INCLUSION**

We become outstanding when we lead with our Power Values.

Our values make us who we are as a company. They are what we believe, what we stand for, and how we show up. Our values embody NRG’s approach to operating our business and building community. If our purpose is the Why, our Power Values are the How. Recognizing that how we do things is as important as what we do makes all the difference in the minds of our customers and communities.

Our Code reflects and reinforces NRG’s values, showing us how we can put them into action and lead by example.

We become our best selves in a Culture of Care.

We can achieve so much more together than we can alone. Working together at NRG means:

- Showing care and respect for colleagues
- Being inclusive and curious about other points of view
- Accepting that what makes us each different enriches our perspective and deepens our insights
- Giving our best efforts and supporting others so they can do the same

As well as highlighting potential risks to watch out for, our Code also helps us maintain a “Culture of Care” in which we can all thrive. In this way, we turn potential into positive impact, as we empower careers, customers, and communities.

TABLE OF CONTENTS

NOTES FROM LEADERSHIP

Larry Coben, Interim President and Chief Executive Officer 04

Michael Bramnick, Senior VP and Chief Compliance Officer 05

ABOUT OUR CODE 06

OUR RESPONSIBILITIES

Responsibilities of Leaders and Supervisors 07

Making Good Choices 08

Express Yourself 09

THE POWER TO BECOME MORE BY LEARNING AND GROWING

We're most energized when we feel included, valued, and safe. Fostering a culture of care at NRG unleashes our potential and allows us to thrive. This means we bring our best to our customers and communities.

Wellness at Work 11

Respecting Each Other 13

Our Thriving and Inclusive Culture 14

Champions of Talent 15

THE POWER TO BECOME INDISPENSABLE TO OUR CUSTOMERS

Our customers expect and deserve that we act with the highest ethical standards as we strive to exceed expectations. We place them at the center of our business. That's where our potential lives.

Protective of Customer Information 16

Honesty and Transparency in Winning Business 18

Fairness in Competition 19

Responsible Trade Partner 20

Impartial in Our Relationships 21

Customer Fairness, Honesty, and Accountability 22

Diligence in Purchasing 23

Engagement in Our Trading Activities 24

Diligence with Our Government Customers 26

THE POWER TO BECOME CREATORS OF EXCEPTIONAL VALUE

Our investors trust us to create and deliver long-term value. We hold ourselves accountable for making smart, ethical choices that benefit our business and take ownership of what we do and what we say.

Accuracy with our Recordkeeping 27

Careful Use of Inside Information 28

Consistency with Records Retention Practices 29

Good Stewardship of our Information Assets 30

Vigilance with Cyber Attack Prevention 31

Principled Judgement with our Choices 32

Prudence with our Resources 33

Thoughtful Public Communications 34

THE POWER TO BECOME A FORCE FOR GOOD IN OUR COMMUNITIES

We are committed to making a positive impact in the world through environmentally responsible business operations, civic engagement, and community investment.

Engaged Citizenship 35

Mindful Interactions with Public Officials 37

Proactively Improving our World 38

Protectors of Human Rights 39

Brand Ambassadors 40

GLOSSARY 41

All policies in this document can be found on the Insider by navigating to Easy Access Links and clicking on Policies & Procedures, or under the Governance section of investors.nrg.com

If you need help or have questions related to anything in this document, please contact ethics@nrg.com.

Get immediate help:

Ethics Mailbox: ethics@nrg.com

Alertline: nrg.alertline.com

Ethics Helpline: 888-263-0463

LARRY COBEN

INTERIM PRESIDENT AND CHIEF
EXECUTIVE OFFICER



Our identity as NRG

- Our team is united by a shared purpose, and our Power Values and vision inspire us to go above and beyond for our customers, shareholders, communities, and each other.
- We implement our value of **Customer-Focus** by demonstrating integrity in our delivery of innovative customer products and services.
- Our value of **Diversity, Equity, and Inclusion** continues to shape our culture and inform our decision-making as we strive to better understand ourselves, our customers, and the communities we serve. We recognize and celebrate our differences and affirm that those differences make us stronger.

What we do

- Our focus every day is making businesses more valuable, more resilient, and better prepared for the future.
- Our core values of **Safety and Well-Being** promote a positive and healthy environment.
- Our core value of **Accountability** guides our commitment to integrity and honesty and requires us to make ethical decisions each day.
- It's an exciting time to be a part of the NRG family — we are growing and adding new customers every day.

Our future is bright

- Our value of **Collaboration** drives us forward; the greatest opportunity for our customers and for us lies ahead.
- Company growth is occurring as we expand our relationships with residential and commercial customers by going deeper into homes and businesses.
- Leading the way for our customers to participate in the sustainable energy transition by offering power and energy-related products along with the peace of mind that comes with helpful services for homes.

We are committed to ethical conduct

- As a part of our deep commitment to delivering exceptional customer experiences, it is important that we regularly remind ourselves of the NRG Code of Conduct, which holds us all to the highest ethical standards.

MICHAEL BRAMNICK
SENIOR VP AND CHIEF
COMPLIANCE OFFICER



Our culture of care

- What we say, how we treat each other, and how we work collectively determines our culture. By supporting each other and showing one another respect and acceptance, we foster a culture of care.
- A culture of care involves more than doing the bare minimum when we engage in the workplace. It encourages allyship, active support and encouragement, and developing meaningful relationships during our employee journey.

Our code supports a culture in which we can all thrive and pursue NRG's purpose together

- To attain a culture of care and achieve the outcomes we want, we must reinforce our commitment to our Power Values. These remind us that how we do things is as important as what we do.
- We already know that if we live our values we consistently outperform our peers when we have to make the right call. It's up to us to maintain our culture and continue to seek improvement.

We all must do our part

- Our Code of Conduct reflects what's important to us. It applies to all of us — to me, to our Board members and officers, and to every employee.
- We will all encounter uncertain or challenging situations that may give rise to concerns. It's essential that we bring our questions and concerns to those who can help resolve them, as identified in the code.
- By adhering to the code, we are living our values and ensuring that NRG continues to be recognized for modeling integrity and ethical behavior in all that we do.

WHY IT'S IMPORTANT

At NRG, we care about doing the right thing — all the time and not just when it's convenient. We want to be known for this as much as for customer service and investor value. When we demonstrate a commitment to acting ethically, we earn and preserve trust and help to ensure we meet our legal obligations as a company. Our code helps to keep us focused on enhancing NRG's reputation through our decisions and actions.

WHY IT'S CALLED "THE POWER TO BECOME"

The code is more than a resource for managing ethics and compliance issues. We called it "The Power to Become" because it's meant to help us reach our potential as individual team members and as a company. While the code can't possibly cover every situation that we might face at work, it can help us be more vigilant and thoughtful. It empowers us to come forward with ideas, questions, and concerns. These make us smarter and better equipped to address our challenges and opportunities.

HOW IT'S ORGANIZED

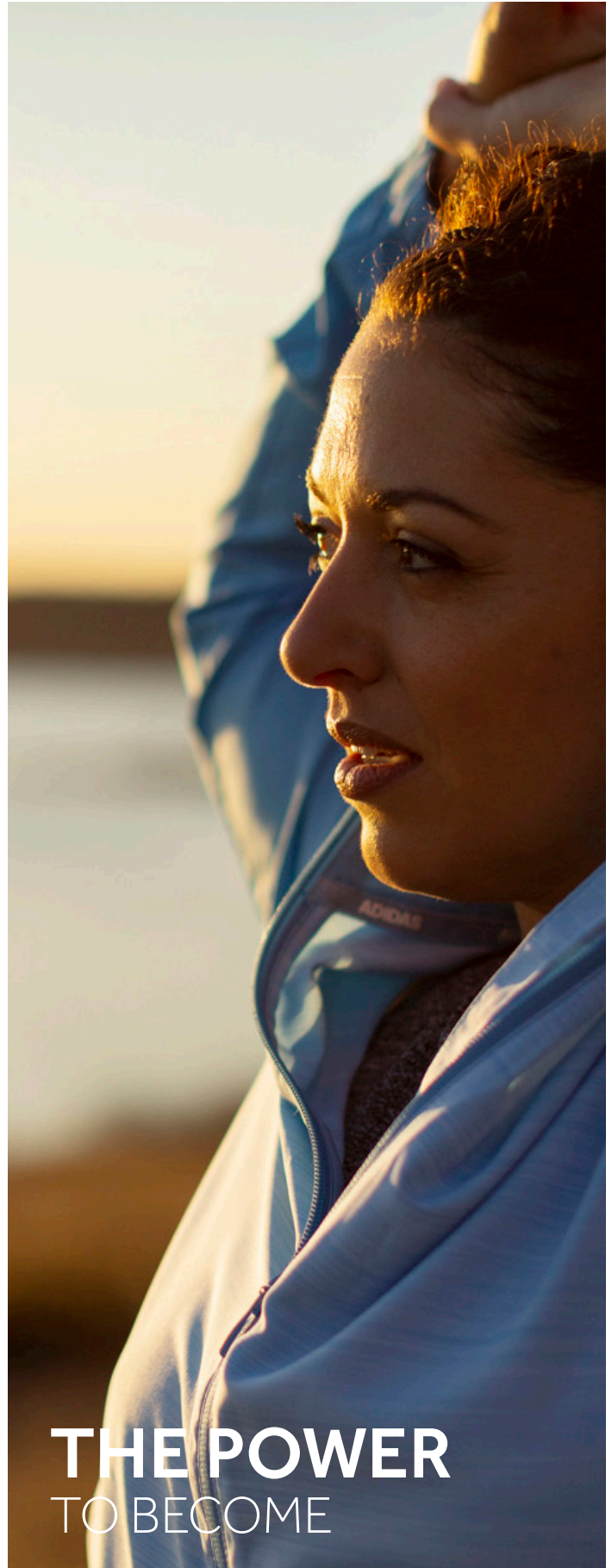
The code groups topics into chapters based on relevance to our culture, customers, investors, and communities. Each topic begins with a principle that we commit to uphold in the relevant context. This is followed by a brief explanation of the importance of the topic and guidance on how to put our values into action. Most sections also include scenarios that highlight issues requiring care and offer guidance on how to address them or seek help.

WHO DOES THE CODE APPLY TO?

The code applies to all of NRG's employees, officers, and directors. It can also apply to business partners, such as suppliers, consultants, representatives, contractors, and agents. We're all expected to be familiar with and follow the code. A violation of the code is a serious matter that may result in disciplinary action.

WAIVERS OR AMENDMENTS

In rare circumstances, we may provide a waiver of this Code. NRG's Chief Compliance Officer may grant waivers to NRG personnel other than to executive officers and members of the Board of Directors. Any waiver or modification of this Code for an executive officer or director must be approved by NRG's Board and promptly disclosed as may be required by laws and regulations, including the rules of the NYSE. Any material amendment of any provision of this Code must be approved by NRG's Board of Directors.



THE POWER
TO BECOME

At NRG, we all take responsibility for doing the right thing and helping others do the same. In our day-to-day work this means:

- Upholding our values and using them to guide our decisions and actions
- Being familiar with company policies and rules that apply to our jobs
- Prioritizing our own well-being while looking out for colleagues
- Asking questions when we're unsure about the best course of action and expressing concerns, especially when they relate to matters covered in the code
- Cooperating when requested to support a company investigation

RESPONSIBILITIES OF LEADERS AND SUPERVISORS

When we lead or supervise others, we have special additional responsibilities related to matters covered in the code. We expect all people managers to contribute to our culture of care by:

- Leading by example, with awareness of how our behaviors and decisions influence others
- Helping team members understand their obligations under our code
- Promoting a positive work environment, where everyone feels empowered to do the right thing while monitoring the emotional and physical well-being of the team
- Actively encouraging team members to come forward with ideas, questions, or concerns and then responding promptly and respectfully, escalating whenever necessary
- Supporting ethics and compliance initiatives, including employee training, as essential business requirements



MAKING GOOD CHOICES

Building the company we want to become is about much more than strategy, business planning and good processes. Above all, it's about people—how we can have the most impact with our combined talents and how we can give our customers the best service and experience.

The choices we make every day, as individuals and teams, can either increase or decrease the positive impact we have through our work. The best choices are always guided by our values and based on:

- A full appreciation of the facts
- Awareness of who will be affected by our decision, and how
- An understanding of our legal and ethical obligations
- Consultation with those having specialized knowledge and experience that can help us

Help is always available. As a first step, it may help to consider the following questions:

WHAT
IS GOING ON:

- Physical danger
- Bad behavior
- Inappropriate transaction
- Risk of loss or damage

WHAT
IS AT STAKE:

- Law or regulation
- Company policy
- Commitments to others

WHO
COULD BE AFFECTED:

- Colleagues
- Customers
- Investors
- Regulators
- Community

WHO
CAN HELP:

- Supervisor
- Compliance
- Legal
- Talent

HOW
SHOULD OUR VALUES GUIDE US:

- Ethics
- Obligations and care for others
- Conscience

HOW
CAN WE HAVE THE MOST IMPACT:

- Trust and relationships
- Service to others
- Brand and reputation



Seeking advice and support is always an option. No one need carry a burden by themselves. If we face a challenging situation or decision, we can make use of the resources detailed in the following section.

EXPRESS YOURSELF

It's good to follow our instincts. We make NRG stronger and protect each other when we raise integrity concerns. If something doesn't feel right, we should call it out. We don't have to know for sure that something is a violation to raise a concern. Our team will deal with it and make sure it is handled the right way.

We have so many ways to ask questions and raise concerns. Reach out using whichever feels most comfortable:

- Your manager or your manager's manager
- Talent
- Legal
- Corporate Compliance
- The Ethics Toll-Free Helpline at 1.888.263.0463
- The [Alertline](#)
- Ethics email: ethics@nrg.com

Please make use of these resources. Bringing up questions and concerns allows us to quickly address the issue and avoid potential problems. If you would like to remain anonymous, use the Helpline or the [Alertline](#). Both are available 24/7 and managed by an independent third party, which will document the information you provide and get it to the right people. No identifying information is kept or stored; your contact is completely anonymous.

Absolutely No Retaliation

At NRG, we have a zero-tolerance policy on retaliation. Anyone who raises a question or concern in good faith about a possible violation of the Code or any laws or regulations will be protected from retaliation. Acting in good faith doesn't mean you have to be right; you need simply have an honest belief that there may have been a violation.

All forms of retaliation are prohibited.

This includes threats, intimidation, reassignment, reduction of hours, demotion, firing, or any other negative consequence directed against an employee who raises a potential ethics or compliance issue. Immediately report retaliation concerns to Talent or through the Helpline or [Alertline](#). Anyone who retaliates may be disciplined, up to and including termination, including officers of the company.



What Happens if You or a Co-Worker Raise a Concern?

No matter how you raise a question or concern, we take it seriously. Concerns are investigated by a skilled and objective team. Confidentiality is important to us; we share information provided only with those who need to know in order to properly address the issue. If appropriate, we will take corrective action. When that happens, we contact the person who raised the concern to let them know, without giving details, that the issue has been addressed.

We all must fully cooperate in any ethics or compliance investigation. Be honest and provide as much detail as possible.





We're most energized when we feel included, valued, and safe. Fostering a culture of care at NRG unleashes our potential and allows us to thrive. This means we bring our best to our customers and communities.

WELLNESS AT WORK

We prioritize everyone's physical, emotional, and financial well-being.

Why It Matters

We don't compromise our well-being. Taking care of ourselves and each other allows us to reach our full potential and better serve our customers and communities.

How We Act

We promote our well-being by:

- Teaming up with Safety to understand specific tasks, jobs, and safety responsibilities and immediately reporting accidents, unsafe conditions, near-misses, or security concerns to Safety, Security, or a supervisor
- Looking out for each other by offering emotional support, practicing active listening with our colleagues, and asking for help when we might need it
- Being our best selves at work, free from the influence of alcohol and prohibited drugs
- Allowing our colleagues to make mistakes and express themselves without fear of negative consequences
- Taking advantage of NRG-provided financial education resources

POWER VALUES IN ACTION

Q: I work as a customer service representative in the customer call center. I noticed that Chloë, who sits nearby, seems nervous in meetings, rarely joins conversations or makes eye contact with me or anyone else on the team. Something seems wrong. How can I help?

A: Thanks for noticing that your co-worker may need help. Offer to listen to Chloë's concerns and point out resources NRG offers, like our counseling services through the Employee Assistance Program. Anyone who sees a teammate struggling should raise the concern to their manager or Talent. Emotional stress can affect all aspects of our lives, including our work. In some circumstances it can lead to anxiety, depression, and other health problems.

Q: I work in a power plant and saw a team member accidentally hit their finger with a large wrench. I know the team always reviews the pre-job safety brief before starting work. Today, however, we were distracted by a medical emergency in another part of the plant and skipped it. My colleague has a minor injury but refuses to report the accident. I'm concerned that by reporting, the team could get in trouble for not following safety protocol. Do I have a duty to report the accident?

A: Yes, you must report the accident. Everyone needs to do their part to create an environment where we feel comfortable speaking up for ourselves and for our co-workers. It's one way we learn and grow. Reporting unsafe situations helps to bring attention to gaps in policies and procedures. This can help prevent a similar incident from occurring again. Remember, we watch out for one another.



Additional Resources

- Key Rules of Safety Policy
- Corporate Safety Manual
- Harassment Free Workplace Commitment Policy
- Drug- and Alcohol-Free Workplace Policy
- Workplace Violence Prevention Policy
- [Respecting Each Other Section](#)



PLUG
INTO NRG

If you or a colleague experience emotional or mental health challenges, please be aware of the following resources for help:

- **Mental Health First Aiders**
- Access the free **Employee Assistance Program** (EAP) through the Benefits Service Center at 1-844-467-4236

RESPECTING EACH OTHER

We all deserve respect, dignity, and fairness.

Why It Matters

The best ideas come from different perspectives, shared in an environment of mutual respect. That doesn't mean we can't disagree; we can and we will, but we'll do so while valuing each other. We want everyone to feel comfortable and safe while working. There is no place at NRG for any form of harassment and acts or threats of violence.

How We Act

We respect each other by:

- Recognizing the worth of every person
- Creating an environment that drives high levels of engagement with our team and customers by speaking honestly, but always being thoughtful about how our words and actions could make others feel
- Having zero tolerance for bullying, harassment, intimidation, or any other kind of abusive conduct
- Actively listening to concerns and suggestions, being open to differing points of view, and approaching disagreements respectfully
- Reporting any concerns to Talent, Corporate Compliance, or through the Ethics Helpline at 1.888.263.0463 or the [Alertline](#)

Additional Resources

- Harassment Free Workplace Commitment Policy
- Workplace Violence Prevention Policy
- [Wellness at Work Section](#)

POWER VALUES IN ACTION

Q: I'm a member of a team that includes several "big talkers." In team meetings, these individuals monopolize the conversation and fail to notice that others could have useful contributions to the discussion. Anne, a reserved co-worker, shares great ideas when we're talking over lunch, but gives up trying to insert opinions during team meetings. What can I do to make Anne feel valued and respected?

A: We all want to be heard. It's part of how we grow at work and everyone's contribution is what makes our company so great. At NRG, we expect our managers to value everyone's opinion. You should talk to your manager about how these meetings are going and voice your concerns about not hearing everyone's point of view. Ask your manager for pointers on how to best engage all members of the team.

Q: At a meeting with a customer, my co-worker made an inappropriate joke. It offended the customer and other colleagues. What is the best way to handle this situation?

A: Inappropriate jokes, even if not intended to offend, can be offensive and disrespectful. If you are comfortable doing so, ask your co-worker to stop telling inappropriate jokes. If you're not comfortable raising this concern directly with your colleague, raise the concern with management, Talent, or call the Ethics Helpline. Apologize to the customer and explain the behavior does not represent NRG's values. Never fear doing the right thing.



**PLUG
INTO NRG**

- When an employee raises questions or concerns about behavior in the workplace – our leaders and supervisors should take swift action
- Leaders should always feel free to escalate where necessary to seek resolution of complex or particularly challenging matters
- In moments of disagreement, actively listen to hear someone's perspective; that's one way to respect your colleague

OUR THRIVING AND INCLUSIVE CULTURE

We thrive on a rich mix of talents and perspectives, which foster a shared spirit of fairness, curiosity, and belonging.

Why It Matters

Solving the most challenging problems requires the depth of insight and breadth of perspectives that come from a workplace as diverse as our customers. We are at our best when we all feel included and valued for our contributions, regardless of background, identity, or point of view. This builds a stronger, more cohesive company and elevates the service and solutions we bring to our customers.

How We Act

We foster a shared spirit by:

- Being intentional allies for our colleagues
- Embracing diversity to better understand our customers, business partners, and communities, and to strengthen our teams through hiring and promotion
- Actively seeking out alternative opinions and approaches, encouraging others to speak up while actively listening so that we benefit from each other's ideas and talents
- Being aware of our own unconscious bias and how it might hinder our ability to be more inclusive and collaborative, and committing to promoting racial equity and justice through our work
- Not remaining silent when we witness social injustice against other employees, customers, and members of our community

POWER VALUES IN ACTION

Q: I am from a predominantly Catholic town. Growing up, I never met anyone who practiced a religion other than mine. My co-worker, Ana, is a practicing Muslim. When we discuss our weekends, Ana often brings up religious activities. I want to hold better discussions with Ana as I think that will improve team morale. Is it appropriate to ask questions about those activities?

A: We ask questions for the purpose of learning and growing. Here, those questions revolve around embracing diversity and promoting inclusion. Remember to ask questions respectfully, actively listen to understand your co-worker's beliefs and traditions, and be prepared to answer questions you might get asked. Don't impose your own perspectives; ask for and be receptive to feedback on how you can be an ally in the workplace.

Additional Resources

- [DEI page on nrg.com](#)
- [Message from CEO: Addressing racial injustice](#)
- [CEO Action Pledge](#)
- Women in Power



**PLUG
INTO NRG**

There are several Business Resource Groups (BRGs) for employees to join and benefit from.

To find more information about [our current BRGs](#) and how to get involved,

CHAMPIONS OF TALENT

We commit to providing everyone with the same opportunities to learn and grow, based on their merits and measurable skills.

Why It Matters

We value talent. We nurture it and help our people learn and grow so they can best serve our customers and be fulfilled in their careers. We focus on the skills and experience we need to get the job done. We do not tolerate prejudice or bias in employment decisions.

How We Act

- Making employment decisions without regard to characteristics protected by law
- Recruiting talent and basing employment-related decisions on qualifications, skills, and merit
- Supporting reasonable accommodations for our teammates and potential candidates with disabilities or certain religious requirements
- Creating a work environment in which we can all be ourselves
- Voicing concerns regarding discrimination, intimidation, or harassment to Talent or Corporate Compliance

Additional Resources

- [Equal Employment Opportunity Commitment Policy](#)
- [DEI page on nrg.com](#)
- [Our Thriving and Inclusive Culture Section](#)

POWER VALUES IN ACTION

Q: I'm friends with Yuki, an accounting analyst who has hearing loss and works remotely. Yuki asked colleagues to improve the lighting on their video conferencing cameras to help her more easily lip-read during team meetings. Is that a request that should be accommodated?

A: Yes. Management could also communicate updated standards for team meetings to the entire group, along with suggestions on how to improve visibility. We support reasonable accommodations to assist and empower our current and potential employees with challenges or disabilities.

Q: I just got a notice that I was selected for a random drug test. I don't think it was random. I think I was picked because I'm a veteran. This is discrimination, and I want to talk to somebody about this unfair practice. Who should I ask for an explanation?

A: You should talk with your manager and/or Talent Business Partner. You will learn that the policy and process is administered to all employees across NRG regardless of veteran status or any other protected class. It is not discrimination when a policy is applied to all employees and administered equally and fairly.



**PLUG
INTO NRG**

- Ensure a diverse pool of candidates for decisions concerning hiring, promotion, or organizational design
- Make sure we take the training necessary to do our jobs well and ensure our employees complete assigned training
- Encourage professional development, in all its forms, so we can all excel and grow

Our customers expect and deserve that we act with the highest ethical standards as we strive to exceed their expectations. We place them at the center of our business. That's where our potential lives.



PROTECTIVE OF CUSTOMER INFORMATION

We do not disclose our customers' personal information to anyone without a legitimate business need and legal right to receive it.

Why It Matters

We must collect, store, use, and share our customers' personal information to run our business and provide excellent customer service. It is important we do all we can to keep this information safe and out of the hands of those who might misuse it. We protect ourselves and NRG's reputation when we maintain proper data protection safeguards.

How We Act

We protect our customers' personal information by:

- Recognizing when we have customers' personal information and keeping it accurate
- Following our policies and procedures and complying with all applicable personal information and data privacy laws
- Collecting and using personal data only as needed and for legitimate business purposes
- Sharing personal information with those who have a legal right to receive it and restricting access to those who do not
- Destroying our customers' personal information when we no longer need it or removing identifying details

POWER VALUES IN ACTION

Q: I work in customer support and have access to customer data that identifies individual customers. A colleague who works in sales asked if I could share customer data in order to offer current customers additional products and services. I don't think this is an issue since NRG's goal is to increase sales. Can I share this customer information with my colleague?

A: Definitely not! If you were the customer, would you want your information shared? Customers have the right to understand and control how we use the data we collect from and about them. Unless customers agree to having their data used for a certain purpose, we can't share it as it is against the law and violates our Code.

Q: I want to use a storage platform to house customer information for a project. NRG doesn't currently use the platform, but I believe its use could benefit the customer. Should I talk to anyone before downloading the platform?

A: Yes. You should consult Information Technology (IT) Security and Legal before downloading any new application to house customer personal data. Acting without approval violates our IT Policy and places our customers at risk.

Additional Resources

- Confidential Information Protection and Breach Procedures
- Retail New York Confidential Customer Utility
- Information Technology (IT) Policy
- Records Management Policy
- [Privacy Policy](#)



PLUG
INTO NRG

Emphasize the critical importance of spotting phishing attempts and malware, and reporting suspicious emails and texts.

HONESTY AND TRANSPARENCY IN WINNING BUSINESS

We do not offer or receive bribes or improper payments under any circumstances.

Why It Matters

Corruption is harmful to our business, our communities, and the marketplace. We strengthen our reputation when we act with integrity and resist all forms of corruption. We practice transparency in our business records to preserve the integrity of our company. Our customers trust us to do business the right way, every day.

How We Act

We are honest and transparent by:

- Never offering, promising, or giving anything of value to a government official, a member of their family, or anyone else to influence official action or a business decision
- Never using a third party to do anything improper on our behalf
- Conducting appropriate due diligence on our international third-party providers and non-profits to ensure they uphold our high ethical standards
- Keeping our accounting books and records with sufficient detail so the description of anything given or received is clear and accurate
- Reporting any bribery or corruption concerns immediately to Corporate Compliance or Legal



POWER VALUES IN ACTION

Q: I work in Government Affairs and am relying on a lobbyist to help persuade lawmakers to pass a bill that will benefit NRG. The lobbyist requested an under-the-table payment which supposedly will guarantee bill passage. What should I do?

A: You must report this to Corporate Compliance or Legal. Government Affairs owns retention of Lobbyists and appropriate due diligence must occur before engaging and paying a lobbyist. The requested payment is almost certainly a violation of law.

Q: I want to use a Costa Rican company to design and build a website. The vendor's prices are considerably cheaper than those of U.S.-based competitors and the vendor can meet an aggressive timeline. I want to respond quickly to get the project going. Can I start doing business with the vendor right away?

A: No. You can't proceed with hiring a foreign vendor until Corporate Compliance conducts the due diligence required by our FCPA Policy. In situations like this, employees should contact Corporate Compliance to start the due diligence process as early as possible. No business should be done with a foreign vendor until approval is received from Corporate Compliance.

Additional Resources

- Policy and Guidelines for Lobbying and Entertaining Public Officials in Texas
- Gift and Receipt of Business Entertainment Policy
- Foreign Corrupt Practices Act (FCPA) Policy
- FCPA Toolkit
- Pay to Play: US and Canada

FAIRNESS IN COMPETITION

We compete vigorously, yet always fairly and legally, wherever we do business.

Why It Matters

We want our customers to enjoy more choice and greater innovation. The laws designed to promote free and fair competition (sometimes called antitrust laws) protect our customers and encourage these benefits. While we compete vigorously for our customers' business, we do so fairly and legally. We aim to out perform our competitors with superior products and services.

How We Act

We compete fairly and legally by:

- Consulting with Legal before engaging in any commercial practices that could harm competition
- Never engaging in discussions with competitors that could appear as an informal agreement regarding competition
- Getting prior approval before attending trade association meetings or participating in any other groups requiring frequent contact with competitors
- Acquiring competitive information in the right way, such as through public filings, press releases, public Internet, and customer feedback
- Publicly representing material facts truthfully and without exaggeration

POWER VALUES IN ACTION

Q: I attended a networking session after a trade show and met Jamie, a peer from a competitor's sourcing department. Jamie mentioned confidential information about another competitor's pricing. I felt uncomfortable and excused myself from the conversation. Did I do the right thing?

A: Yes. You exercised good judgment by leaving the discussion. You should also make it clear to Jamie that you believe the discussion is inappropriate and contact Legal as soon as possible to document the conversation.

Q: My new co-worker, Alex, recently joined our company from a competitor. Is it okay to ask about the products and services Alex's former employer was developing?

A: No. It is not appropriate to ask Alex for this information. It is also not appropriate for Alex to volunteer the information. Seeking or using confidential information about our competitors is never acceptable.

Additional Resources

- Communications Policy



RESPONSIBLE TRADE PARTNER

We are committed to conducting our business in compliance with all applicable international trade laws.

Why It Matters

We are proud to do business with our international trade partners. We follow all applicable laws governing international trade, including any restrictions that may apply from time to time. We recognize that these laws and regulations apply not only to the movement of physical goods, but also to data that crosses borders.

How We Act

We trade across borders responsibly by:

- Knowing, understanding, and following applicable trade laws
- Never doing business with countries or entities subject to trade embargoes or economic sanctions
- Never participating in or promoting boycotts our government does not support
- Conducting due diligence and monitoring international suppliers for unlawful or unethical activity

Additional Resources

- Risk Management Policy, NRG Employee Guidance on Anti-Money Laundering
- Foreign Corrupt Practices Act (FCPA) Policy
- Social Responsibility Standards for Manufacturers Policy

POWER VALUES IN ACTION

Q: I was approached by an acquaintance who works for a utility company in another country about sharing technology information. Is this okay for me to do?

A: Moving technology across international borders could violate international trade laws. Contact Corporate Compliance and Legal for guidance before replying to your acquaintance.



PLUG INTO NRG

“Red Flags” to watch for:

- Supplier attempts to request banking or other financial information business contact information
- Supplier refuses to certify compliance with applicable laws or our company's policies
- Contract language from the foreign supplier appears to discriminate against a specific race, religion, sex, or nationality

IMPARTIAL IN OUR RELATIONSHIPS

We win business and build relationships based on trust and mutual value, and never through inappropriate gifts, expenses, or hospitality.

Why It Matters

Giving and receiving small gifts and sharing reasonable meals and appropriate entertainment (business courtesies) are ways to connect with people and deepen business relationships. It is never appropriate to offer or accept gifts, entertainment, or other favors that are, or may appear to be, intended to influence the business decisions of the people receiving them.

How We Act

We avoid improper influence by:

- Giving and receiving business courtesies that are legal, appropriate under local customs, and not excessive in value
- Politely declining the offer of a valuable gift or extravagant entertainment, and notifying our supervisor
- Accurately recording business courtesies in our books and records and never associating business courtesies with decisions to contract or purchase, or to seek or retain business
- Never requesting a business courtesy from our suppliers or other business partners
- Contacting Corporate Compliance if we are unsure about a business courtesy and reporting or receiving prior approval as required by our Gift and Receipt of Business Entertainment Policy

Additional Resources

- Gift and Receipt of Business Entertainment Policy
- Foreign Corrupt Practices Act (FCPA) Policy
- Policy and Guidelines for Lobbying and Entertaining Public Officials in Texas

POWER VALUES IN ACTION

Q: During the holiday season, I received a set of beer glasses from a potential business partner who is bidding on installing a new computer system. Should I accept the gift and hand out the glasses to my team?

A: You are not allowed to accept any type of gift, regardless of the value, because this third party is in the middle of the bidding process. There is no exception, even during traditional gift-giving seasons.

Q: A reliable vendor just finished an important project that will help us better serve our customers. The vendor completed the project on time and under budget. Are we allowed to show our appreciation with a gift?

A: Yes. We may give a reasonable and modest gift to strengthen our relationship with the vendor — provided it complies with local standards, aligns with our Gift and Receipt of Business Entertainment Policy, and meets the vendor's policy. We want others to respect our policies, and we should respect theirs, too.



CUSTOMER FAIRNESS, HONESTY, AND ACCOUNTABILITY

We go above and beyond for our customers, and are always fair, truthful, and transparent when dealing with them.

Why It Matters

Our reputation for honesty and integrity means everything to us. Our customers have choices besides NRG or our family of brands; they trust us to serve them well and treat them fairly. This means being clear, transparent, and respectful in our customer interactions. It also involves holding ourselves accountable for achieving the best outcomes for our customers. This preserves our reputation and promotes our brand.

How We Act

We deal honestly and fairly with our customers by:

- Ensuring that any claims we make about our products and services are true and substantiated, including pricing
- Informing customers about options that may be right for them and explain them in a fair and balanced way
- Focusing on the positive attributes of our products and services rather than disparaging those of our competitors
- Seeking Legal's review of proposed new products and services, as well as of marketing materials, to ensure we meet legal and regulatory requirements
- Never taking shortcuts that affect the quality and safety of our products and services

Additional Resources

- Customer-Focus Leadership Toolkit

POWER VALUES IN ACTION

Q: Marketing is working on an advertising campaign for a new energy efficiency product that could cut the customer's energy bill in half. While we believe that our product will be effective, our internal testing data does not yet validate this claim. Can we nevertheless make this claim in the advertisement?

A: No. It is doubtful whether every customer's energy bill will halved by using our product. We do not exaggerate about the quality and effectiveness of our products and communicate only substantiated data.

Q: I received a call from a potential customer asking about our service offerings. After spending some time getting to know the customer's needs, I decided to talk about a more expensive option than the customer really needs since the customer didn't seem overly concerned about price in this initial discussion. This is fine since upselling is good for NRG, right?

A: It's true that NRG is in business to make money. But we have to do it the right way, so that our customers continue to trust us. We should always explain our products in a fair and balanced way. Put all the options on the table. The customer will make the best decision for themselves, and we believe we can win when it's a fair competition.



DILIGENCE IN PURCHASING

We select our business partners carefully and treat them fairly.

Why It Matters

Our customers expect us to provide reliable services and innovative products that improve their lives and their businesses. We rely on meaningful relationships with our suppliers to help us deliver cleaner, customized, and connected solutions to residential and commercial customers. We require our suppliers to share our commitment to conducting business with integrity and with the highest safety standards.

How We Act

We are diligent in purchasing by:

- Ensuring our selection process treats suppliers equally and fairly without regard to the transaction value or the length of our relationship
- Providing diverse suppliers (small, disadvantaged, minority-owned, woman-owned, veteran-owned, and historically under-used businesses) with bidding opportunities
- Doing business with suppliers who best meet our requirements and share our values and evaluating their performance on clear measures such as quality, service, price, availability, and reliability
- Avoiding any appearance or actual conflict of interest, and if unavoidable or inadvertent, promptly disclose them
- Following our data privacy policies and laws when giving or receiving confidential information

Additional Resources

- Confidential Information and Protection Breach Procedures
- Gift and Receipt of Business Entertainment Policy
- Inventory Policy
- Nepotism Policy
- [Conflicts of Interest](#)



POWER VALUES IN ACTION

Q: One of my many responsibilities at NRG is the purchase of office furniture for several workspaces. Our company recently decided to revamp one of those workspaces to accommodate hybrid work schedules. My sister, Roberta, owns a commercial furniture company that sells tech-friendly desks. It's really a win-win for me if I can secure a large purchase of state-of-the-art desks and support Roberta's company. Can I contract with Roberta as a vendor?

A: No. As much as you may believe that the furniture sold by your sister is ideal for NRG, you can't directly engage a vendor (or any contingent worker/contractor for that matter) to whom you're related. We won't engage with a vendor, supplier, or contractor who is related to an employee without specific approval from Corporate Compliance.

ENGAGEMENT IN OUR TRADING ACTIVITIES

We are committed to trading and marketing power, gas, and renewable credits in an ethical, lawful, and transparent way.

Why It Matters

Our commitment to doing business with integrity is absolute. We apply the same ethical standards to our wholesale and retail business activities. When we trade natural gas and power on the wholesale markets, we operate transparently and comply with applicable laws, rules, and regulations. These include the rules and regulations of the Federal Energy Regulatory Commission (FERC), the Commodities Futures Trading Commission (CFTC), the Department of Energy (DOE), North American Electric Reliability Corporation (NERC), and the relevant independent system operators (ISOs).

How We Act

We trade products responsibly by:

- Ensuring there is a legitimate business purpose for the trade—before entering into it
- Never participating in a transaction that is, or could have the appearance of being, fraudulent, deceitful, or a violation of law, rules, or regulations
- Providing truthful and reliable information internally as well as to our regulators and market monitors
- Preparing and keeping complete and accurate documentation of all trading activity
- Seeking guidance and training resources from Risk, Regulatory Compliance, and Legal



PLUG INTO NRG

- Talk to your supervisor, contact any senior leader of NRG or email the [Ethics Mailbox](#).
- The NRG Ethics Helpline (888-263-0463) and [Alertline](#) are accessible 24 hours a day, seven days a week, and are administered by an outside company to ensure confidentiality and anonymity, if desired.

Calls are not traced or recorded, and the Company does not keep any identifiable information regarding the sender of an online communication.

If you are a member of the Board of Directors, you should report suspected violations of the law, the Code or NRG policies to the Chair of the Governance & Nominating Committee and to the General Counsel or the Chief Compliance Officer.



POWER VALUES IN ACTION

Q: My colleague, Casey, placed trades in opposite directions on the same paths in the same volumes, and during the same hours. The trades involved no economic risks. Did Casey violate the law and NRG policy?

A: Yes. Casey engaged in a fraudulent trade that subjects NRG to potentially significant FERC penalties and loss of profits, plus interest. We have an obligation to report suspected violations of the law, our Code of Conduct and our policies. If we witness or learn of a potentially illegal trade, we should immediately report it to Regulatory Compliance, Legal, Risk, or use the Ethics Helpline at 1.888.263.0463 the [Alertline](#).

Q: I work as a natural gas trader. The CFTC issued new regulations recently, which apply to the types of trading activity that I oversee. After reading through materials about updates to the market regulations, I still have questions. Should I reach out for help?

A: Yes. As responsible professionals, we must all stay current with rules and regulations that apply to our jobs—in this case, market rules applicable to trading activities. However, we don't have to figure out these rules alone. You should reach out to your supervisor, Regulatory Compliance, Risk, and Legal for targeted advice and guidance as well as take periodic refresher training.

Additional Resources

- Energy Trading Compliance Policy
- Commodity Trading Compliance Manual
- Risk Management Policy
- Records Management Policy
- Ethics Helpline (1-888-263-0463)
- [Alertline](#)

DILIGENCE WITH OUR GOVERNMENT CUSTOMERS

We comply fully with the special rules and regulations that apply to our government customers.

Why It Matters

We are proud to serve our nation when we're asked to contract with government agencies. We know that government contracts have some very specific requirements, and we are careful to understand and follow them.

How We Act

We serve government customers by:

- Doing the work that we agreed to do under our contracts to the standard necessary for our government customers
- Protecting classified information as the government requires
- Ensuring all information provided to a government customer is truthful, accurate, and complete
- Carefully following billing and accounting practices as required
- Being aware of heightened procedures and expectations when hiring or working with current or former government employees

POWER VALUES IN ACTION

Q: My teammate, Riley, works on a contract for a government agency and identified a potential candidate to hire with the necessary experience. The candidate previously worked for the U.S. government. Should Riley begin employment discussions with the candidate?

A: No, Riley needs to take a pause and work with Talent and Legal to ensure compliance with all applicable laws and restrictions before starting employment discussions with former U.S. government employees.

Q: I manage an energy contract for a government agency and have determined that a minor change to the agreed terms will produce a better result. Should I proactively make the change?

A: No. We must do what we originally promised to do for our government customers, even if a change would improve results. A breach of contract terms could create big problems like financial penalties or even suspension or debarment from further government work.



PLUG INTO NRG

- How to make employees aware when work is for a government contract
- Remind employees of additional responsibilities when working with the government
- List precautions and considerations that should be kept in mind when working with the government

Our investors trust us to create and deliver long-term value. We hold ourselves accountable for making smart, ethical choices that benefit our business and take ownership of what we do and what we say.

ACCURACY WITH OUR RECORDKEEPING

We keep accurate records so we can operate ethically and efficiently and provide truthful information to those within or outside NRG who need to rely on it.

Why It Matters

Keeping accurate and truthful business records is essential. It allows us to make sound business decisions, based on correct information. As a public company, we have legal obligations to make regular reports to our regulators and shareholders; we can only do this effectively if our records are complete and up to date.

How We Act

We protect our customers' personal information by:

- Recording all business transactions accurately, in appropriate detail, for the right period, and in a timely manner
- Completing incident reports, expense reimbursement claims, and time sheets accurately and on time
- Never setting up secret, "off-the-books" cash funds or other assets or liabilities
- Addressing concerns and correcting errors promptly, notifying management and those affected

POWER VALUES IN ACTION

Q: I drive to several company sites each week in my own car. On my expense report, I usually include the full mileage, even though there may have been some side trips for personal errands. Is this acceptable?

A: No. Mileage reimbursement should be for business travel only. It is never acceptable to provide false information on a business record, even if the discrepancy or the dollar amount is small.

Q: My co-worker wants to wait and submit a substantial expense report next quarter, so the team doesn't go over budget this quarter. Should they hold on to the expense report a few more days?

A: No. We don't deliberately misrepresent/alter our reports/documents, even if the expense is small. Intentionally recording expenses in the wrong accounting period is never acceptable.

Additional Resources

- Records Management Policy
- Foreign Corrupt Practices Act (FCPA) Policy
- Gift and Receipt of Business Entertainment Policy



CAREFUL USE OF INSIDE INFORMATION

We don't use or share non-public information about NRG or any other company for any reason, and certainly not to give ourselves or anyone else an advantage in the stock market.

Why It Matters

Through our work, we regularly come across information about NRG or other companies that could be useful to investors. This can include non-public or "inside" information, which investors could use to predict stock or bond market performance. Insider trading occurs when someone uses this information to benefit themselves or shares it with others as a stock market "tip." Trading on inside information is like cheating in a card game on a large scale; it affects the entire stock and debt markets and those who invest their hard-earned money in them.

How We Act

We exercise care with inside information by:

- Never using it to make trading decisions to buy or sell NRG stock or securities or those of any other company
- Not sharing it with anyone outside our company (including family and friends)
- Sharing inside information with colleagues only on a need-to-know basis
- Avoiding accidental disclosure of nonpublic information (such as chatting with a team member in a public place about work matters that aren't public)

Contact Legal if you have any questions about whether certain data is considered "material non-public information" or whether you can make a trade of securities.

Additional Resources

- Securities Trading and Non-Disclosure Policy
- Investor Communications Policy

POWER VALUES IN ACTION

Q: My cousin's small business took a big financial hit as a result of the pandemic. Since NRG is doing well, my cousin asked me if I recommended investing in NRG stock. I feel like the new service offerings we'll be announcing soon will make our stock a no-brainer. Can I tell my cousin this?

A: Definitely not. At this point, the details are not public, which could provide your cousin with an unfair trading advantage. Any time you are unsure whether information you have about NRG, or another company is material, nonpublic information, contact Legal for guidance.

Q: I recently learned that NRG is about to make significant leadership changes. I would like to rebalance my 401(k) investments to include NRG stock. Can I proceed to rebalance my investments?

A: Information about significant leadership changes qualifies as material, inside information. You should call Legal for guidance before you start rebalancing your investments.



CONSISTENCY WITH RECORDS RETENTION PRACTICES

We manage and dispose of our business information responsibly.

Why It Matters

Outdated information can create unnecessary risks for us. When we all practice consistent and reliable records management, we all have access to what we need when we need it.

How We Act

We manage our records and information responsibly by:

- Retaining and destroying records according to NRG's retention schedule and following proper procedure when doing so
- Keeping an eye out for any retention and preservation notices received from Legal (Legal Holds)
- Filing or saving records in the required locations, including NRG-approved cloud platforms
- Not using communication methods that allow messages to become inaccessible, disappear, or hinder message recovery
- Notifying Legal of any complaint, demand letter, or other proceeding related to retaining records

Additional Resources

- Records Management Policy
- Records Retention Schedule
- Information Technology (IT) Policy



POWER VALUES IN ACTION

Q: My colleague, Kai, keeps records longer than the retention period by printing certain documents because of a belief that the period is too short. Kai likes having some work papers handy for future reference and nobody checks the filing cabinet anyway. Is this okay?

A: No. Kai must follow the record retention schedule as it ensures we meet our legal responsibilities and manage our risks appropriately. It is every employee's responsibility to ensure that they follow the records retention period for their documents. Contact Legal to review a retention period if it appears too long or short.



GOOD STEWARDSHIP OF OUR INFORMATION ASSETS

We safeguard NRG's confidential and proprietary information and any entrusted to us by others so we can provide the best product and service experience.

Why It Matters

One advantage we have in the marketplace is our internal, confidential business information. We use it to innovate for the benefit of our customers and to grow our company. It's critical to our success.

How We Act

We safeguard confidential and proprietary information by:

- Sharing it only with those who have a business need for it, and conducting confidential discussions where others can't overhear us
- Consulting Legal about the need for a confidentiality agreement before sharing confidential or proprietary information
- Securing our confidential documents and electronic devices and sharing such information only via NRG's network
- Referring any requests from third parties about our confidential and proprietary information to Legal
- Remembering that our confidentiality obligations continue after we leave NRG

Additional Resources

- Communications Policy
- Confidential Information Protection and Breach Procedures
- Information Technology (IT) Policy
- Social Media Policy
- [Being Protective of Customer Information Section](#)

POWER VALUES IN ACTION

Q: I work in a Business Development role and am up against a tight deadline. Working on the project at home, later in the evening, seems like a good idea. I want to email a spreadsheet containing confidential customer information to my personal email so I can work on it outside the office on a personal computer that has more functionality. Is this allowed?

A: No. NRG's confidential and proprietary information must never leave our network. There are security safeguards in place – many of which aren't obvious – to ensure information is kept confidential and secure.

Q: My manager, Elena, focuses on mergers and acquisitions and uses Microsoft Team for collaboration. Terrance is a former member of Elena's group who transferred to another department a couple of months ago. Elena realizes Terrance was not removed as a member of the Teams site. What should Elena do?

A: Elena must immediately remove Terrance as a member of the Teams site and remind Terrance the information on the site is confidential and should not be discussed with anyone in his new group. Elena should also notify the next level of management immediately to determine if any additional steps need to be taken as a result of the oversight.



PLUG INTO NRG

What are some privacy best practices that we should implement for day-to-day use?

- Multi-Factor Authentication
- Privacy screen for laptop
- VPN use

VIGILANCE WITH CYBER ATTACK PREVENTION

We are all responsible for protecting our network and the security of our equipment.

Why It Matters

Hackers are crafty and we are the best shield against their attempts to get into our systems and wreak havoc. Our network and computer equipment help to drive our business. We depend on them for our everyday activities that involve valuable, confidential information about NRG, our colleagues, and our customers.

How We Act

We stay vigilant against cyber-attacks by:

- Using only equipment, systems, networks, and services provided by NRG when doing our work
- Not downloading unauthorized software or applications on our work computers
- Not sharing our passwords with anyone
- Never clicking on unfamiliar or questionable links or attachments or responding to unusual requests
- Immediately reporting any suspicious emails to IT Security

Additional Resources

- Information Technology (IT) Policy

POWER VALUES IN ACTION

Q: I received an email from NRG's "CEO" requesting my attendance at an important meeting for all employees. I see a calendar invitation. Should I open it and accept?

A: No. You must exercise caution and first determine if the invitation is legitimate. We look for signs an email is suspicious such as misspelled words, grammatical errors, low-resolution logos, a misleading domain name in the URL, or a message that contains a request for personal information. Trust your instinct; if the email or text seems odd, unusual, or unexpected, it likely is. Check with IT Security.

Q: Sometimes I am away from my desk and can't always quickly answer questions. So as not to slow anyone down, I'm considering sharing my password with a trusted team member. There's nothing wrong with that, is there?

A: While it's great that you trust your co-worker, this is not the correct way to collaborate. Sharing your password is never the right thing to do, even if you think it's helping the team. We have many company-approved tools like SharePoint and Teams that are secure and allow for information sharing with others on the team.



**PLUG
INTO NRG**

We can prevent cyber-attacks by being diligent and taking personal responsibility. Knowing how these breaches occur can help us prevent them. Listed below are various common examples:

- Phishing
- Click-bait
- Spear-phishing
- Catphishing
- Malware
- Man-in-the-Middle Attack (usually happens when using unsecured public Wi-Fi)

PRINCIPLED JUDGEMENT WITH OUR CHOICES

We act solely in the best interests of our company.

Why It Matters

We make smart choices in our company's best interests. We don't allow personal interests or relationships to affect our business decisions. Using good judgment and avoiding conflicts of interest builds trust and confidence and avoids giving anyone the impression we're acting improperly.

How We Act

We avoid conflicts of interest by:

- Identifying and disclosing to Corporate Compliance any situation that could put NRG's interests and our own personal interests into possible conflict
- Avoiding the appearance of a conflict of interest by being aware of our existing personal and business relationships
- Never using our position with NRG for personal gain
- Not allowing the desire to help friends and family influence our decisions at work
- Not allowing outside approved jobs or activities to get in the way of our work for NRG

Personal loans have inherent conflicts. NRG will not provide a personal loan or extend personal credit to a director or a member of his or her family.

POWER VALUES IN ACTION

Q: My relative owns a business and is looking to do contract work for NRG. Do I need to do anything?

A: Yes. You should report the relationship to Corporate Compliance and Supply Chain. Even if your relative is doing work unrelated to your position at NRG, the relationship should be disclosed and approved in advance. While there may not be a direct conflict, the appearance of a conflict may exist.

Q: The local city planning commission asked me to be a member. The commission advises on land use, design plans, and zoning matters for the municipality. Should I talk to Corporate Compliance before accepting the position?

A: Yes. Your role on the planning commission could be a conflict of interest if people perceive that you are acting as an NRG employee instead of as a resident. So, you should disclose and seek approval of your intention to join the commission and, once approved, ensure that you represent yourself and don't speak on behalf of NRG.

Additional Resources

- Gift and Receipt of Business Entertainment Policy
- Nepotism Policy



**PLUG
INTO NRG**

Conflict of Interest checklist:

- Identify any business with family and friends, even if not directly related to your position at NRG
- Assess your personal relationships and follow NRG's nepotism guidelines
- Always disclose outside employment or Board participation
- If you are a member of the Board of Directors, you must promptly disclose personal interests or other circumstances that might constitute the appearance of or an actual conflict of interest to the Chair of the Governance & Nominating Committee, with copies to the Chair of the Board, the General Counsel and the Corporate Secretary. A director may only proceed with a transaction that is, or may be, a conflict of interest after receiving approval from the Board

PRUDENCE WITH OUR RESOURCES

We safeguard company assets and use them wisely.

Why It Matters

We are building NRG's future with our resources. They sustain our business and allow us to innovate and improve our customers' experience. As good stewards of company assets, we safeguard them and use them responsibly.

How We Act

We safeguard company assets by:

- Taking care to avoid loss, damage, destruction, and theft
- Being vigilant to prevent fraud, waste, or unauthorized use
- Knowing which of our company's assets need our protection
- Never moving or transporting NRG property without permission
- Following our security and access requirements to protect our facilities, systems, and data

Additional Resources

- Information Technology (IT) Policy



POWER VALUES IN ACTION

Q: One of my co-workers mentioned that they took a second job and said it is easier to juggle given that they are working remotely. They said they aren't working additional hours at NRG to make up for the time spent on their other job because they always "appear" to be online. Is this allowed?

A: No. It's dishonest and unacceptable. As NRG employees, we all have an obligation to give our full time and attention to our job. Second jobs, including running your own business, require approval from your manager and Corporate Compliance and take into consideration the needs of your current role and responsibilities.

Q: A close colleague and I were walking back to our desks from lunch. I opened the secure door with my badge and we both walked in. A colleague on the way out told me that two people should never come in on one badge. Since I knew the person I was with and she had a badge, I couldn't understand the fuss.

A: Controlling access to company facilities is important for several reasons. It ensures that only people who are supposed to be there are allowed in. This keeps our people and our confidential information safe. When we badge in and out, we also enable our company to keep track of who is in the building in case there is a fire or other emergency. Your colleague did the right thing by reminding you that it's company policy to only badge in yourself. If you ever perceive a security concern or something that poses an actual or potential risk to any of us, our facilities, or operations, contact Enterprise Security at enterprise.security@nrg.com.

THOUGHTFUL PUBLIC COMMUNICATIONS

We build our brand and relationships through clear, consistent, and truthful communications.

Why It Matters

Words really do matter. When we use them well, they're powerful. Communicating with customers, investors and other stakeholders in an authentic and respectful manner can build trust and loyalty. No matter how well intended or articulate we are, it's important to know when to rely on the special skills and experience of Communications or Investor Relations to handle inquiries or to communicate on NRG's behalf.

How We Act

We are thoughtful about company communications by:

- Being professional in all our communications, no matter what the medium
- Referring media or analyst requests to Communications or Investor Relations, as appropriate
- Never speaking for NRG unless authorized to do so
- Making speeches or giving interviews on behalf of NRG only when Communications and management approve

Additional Resources

- Communications Policy
- Social Media Policy

POWER VALUES IN ACTION

Q: As I was leaving the office, a reporter approached me to get a comment on a piece of controversial legislation. I know a lot about the issues and believe I would have been qualified to respond. Why do I have to refer the reporter to Corporate Communications?

A: It is important that our company speaks with one voice. Our Corporate Communications colleagues are up to date on NRG's position and are trained in responding to the media.



We are committed to making a positive impact in the world through environmentally responsible business operations, civic engagement, and community investment.



ENGAGED CITIZENSHIP

We participate thoughtfully in the political process to advocate for our company's interests and positively impact our communities.

Why It Matters

We believe that engaged citizens make for a healthy society. As a company, we support a fair political process and our employees' right to participate in it. We engage policymakers on issues and concerns that are important to our business and our customers. We do this ethically, transparently, and follow all rules related to lobbying.

How We Act

We engage thoughtfully in the political process by:

- Supporting causes that matter to us personally by using our own time and money and never giving the appearance that we are representing NRG's position (unless formally requested to do so)
- Supporting our communities by participating in events set up through PositiveNRG
- Refraining from encouraging co-workers, customers, or business partners to support a candidate or political cause
- Contacting Corporate Compliance for preapproval if we are considering running for office or making a personal political contribution so as to satisfy state pay-to-play obligations
- Working with Government Affairs on any potential political contribution using corporate funds. Only Government Affairs may make such contributions, with approval from Corporate Compliance. NRG's PAC makes independent choices, using voluntary employee funds to benefit NRG



POWER VALUES IN ACTION

Q: I'm passionate about a candidate who I think will work tirelessly to pass laws benefiting NRG and the communities we serve. I want to educate everyone on my team about my candidate and ask for their support. May I ask them to volunteer, distribute flyers, or donate?

A: No. We're glad you're engaged in the political process and want to make a difference. However, you can't use your position to influence or pressure colleagues into supporting your candidate. Discussing the candidate with your team may make them uncomfortable, especially if they do not share the same views as you.

Q: Several of us in my department are volunteering to help a friend of ours get elected. We live in different parts of the city, and it's more convenient for us to get together at the office, after business hours, to make phone calls. Is that okay?

A: No. Even though it is after hours, using company equipment and facilities could make people think NRG is supportive of your candidate. Your activities must remain separate from NRG.

Additional Resources

- [NRG Political Contribution Policy](#)
- Message from CEO: Supporting our democracy and common value



PLUG INTO NRG

Interested in being an engaged citizen at NRG?

Find more information on NRG's PAC

MINDFUL INTERACTIONS WITH PUBLIC OFFICIALS

We seek productive relationships with government agencies, lawmakers, and regulators, and are careful to avoid even the appearance of improper influence.

Why It Matters

We work hard to maintain productive relationships with lawmakers and regulators. It's important for colleagues with the right experience and training to manage these relationships. This makes sure we avoid any misunderstandings or the appearance of anything improper.

How We Act

We are mindful of interactions with public officials by:

- Understanding and following the rules on lobbying, including disclosure and reporting requirements
- Using only lobbyists engaged by Government Affairs to advocate on NRG's behalf
- Notifying Government Affairs Regulatory Affairs if contacted by a government or regulatory official or political candidate
- Never engaging in conduct that could appear to improperly influence a public official
- Understanding any information shared with a public official may become public under certain laws

Additional Resources

- Policy and Guidelines for Lobbying and Entertaining Public Officials in Texas
- Gift and Receipt of Business Entertainment Policy
- Foreign Corrupt Practices Act (FCPA) Policy
- NRG Political Contribution Policy

POWER VALUES IN ACTION

Q: I've become friends with a staff member of our state public utility commission. My friend has told me about an interest in joining NRG. Can I talk about how great it is to work for our company and offer to make introductions to a few managers who are hiring?

A: No. While we should all be ambassadors of NRG, you shouldn't discuss potential company employment with an employee of one of our regulators. Instead, you should refer your friend to the Careers section on our public website and in this case, notify Regulatory Affairs.

Q: We need approval for an environmental permit and are concerned we may not get it. One of the Commissioners at the Texas Commission on Environmental Quality belongs to my gym. Can I have a conversation over coffee and try to plead our case?

A: No. That would be an improper communication because it wouldn't give notice to all relevant parties and wouldn't be on the public record. This is a matter needing guidance from Legal, Environmental, and Government Affairs.



PROACTIVELY IMPROVING OUR WORLD

We use our influence and sustainable business know-how to make the world a better place.

Why It Matters

We are leaders in tackling challenges facing our climate and the quality of our environment. In serving our customers and investors, we know how important it is to balance innovation, profitability, and sustainability. We're committed to managing our business in economically and environmentally responsible ways with an eye to continual improvement.

How We Act

We proactively improve our world by:

- Innovating products and services to serve our customers in their energy efficiency efforts and their sustainability journey
- Expanding our ability to deliver clean energy options to our customers
- Leading discussions on our Environmental, Social, and Governance (ESG) strategies with our regulators and other stakeholders
- Ensuring our business decisions consider environmental impact
- Complying with laws and regulations for air emissions, water quality, hazardous wastes, and spill prevention

Additional Resources

- Environmental Manual
- [NRG Sustainability Report](#)

POWER VALUES IN ACTION

Q: I have a couple of co-workers who say they work best when they print material rather than looking at it on-screen. They say that printer paper costs only a few cents per sheet and call me the “Paper Police” when I remind them to print double-sided and to recycle what they use. I find their attitude frustrating. Is there a constructive way to engage with them on the topic?

A: Reducing our paper consumption and recycling what is used are just two of the ways in which NRG reduces both financial costs and environmental impact. No one expects us to reduce paper consumption to zero, but we can do our part to reduce, reuse, and recycle. When we do print confidential documents, always be sure to dispose of them securely in the shred bins. And remember, NRG has online collaboration tools, like Teams, that we should try to use as much as possible.

Q: When I drove into the plant parking lot earlier, I noticed a company truck that seemed to be leaking quite a lot of oil. Should I let someone know?

A: Yes. You should contact plant management and Environmental. We follow all applicable environmental laws, and plant management can work with Environmental to determine if the spill requires reporting to a regulator as well as how best to clean it up. Anyone working at one of our office locations would report a similar incident to Facilities.



**PLUG
INTO NRG**

Contact Sustainability or read more about our current sustainability efforts to learn how we can help our customers live more sustainably.

Contact Environmental for inquiries or navigate to nrg.com/sustainability/approach.html to learn about various programs and initiatives driven by NRG to improve our world.

PROTECTORS OF HUMAN RIGHTS

We respect and protect human rights in our workplaces, supply chain, and communities.

Why It Matters

Human rights matter everywhere. They're as relevant in our workplace and communities as they are in some far-off foreign factory. That's why we put people first and treat them with dignity and respect. It's why we focus on equal opportunity, fair wages, and working conditions; and we expect our business partners to do the same. It's why we protect the environment and try to have a positive impact in our communities.

How We Act

We protect human rights by:

- Providing safe and healthy working conditions
- Meeting or exceeding legally required standards for compensation and benefits
- Following ethical sourcing practices
- Respecting our team members' lawful right of free association and collective bargaining
- Fostering economic development that has a positive impact in our communities

Additional Resources

- Human Rights & Social Responsibility Standards for Manufacturers
- Conflict Mineral Policy
- Supplier Code of Conduct
- Equal Opportunity Employment Commitment Policy

POWER VALUES IN ACTION

Q: I read an article about one of our business partners, saying they have a history of unfair labor practices. It looks like a lawsuit is about to be filed against them. Should we continue doing business with them until the court case is decided?

A: Maybe. Our business partners must reflect our values. Our businesses and brands, Supply Chain and Corporate Compliance all monitor supplier and contract manufacturing performance, but you should make them aware of the article, just in case. They will evaluate our relationship with the business partner and determine if any action is required.



BRAND AMBASSADORS

We are thoughtful and responsible when we connect with the world online.

Why It Matters

Connecting with the world through social media, personally and professionally, is a powerful way to share knowledge and build our brand. But remember, new tools, old rules! We must use the same good manners and good judgment in our social media and email communications as we do in person or on the phone. Information can spread rapidly and unpredictably online. Let's be sure the impressions we give — of ourselves and our company — are the ones we want to leave with people.

How We Act

We are ambassadors of our brand by:

- Always being respectful to others — just as we are at work
- Using social media to strengthen our brand and represent our Power Values while being crystal clear that any opinions we express about public policy, politics, or our industry are solely our own and not NRG's
- Never posting on social media information about our customers or confidential information about NRG
- Sharing information curated by our company

Additional Resources

- Communications Policy
- Social Media Policy

POWER VALUES IN ACTION

Q: I was checking my Twitter feed and saw a customer complaining about our service and making comments about us that aren't fair. I really want to tweet a defense of our company I don't understand why company policy say I can't.

A: We should pay attention when we see an unhappy customer. A direct response over Twitter risks misinterpretation and we are never authorized to speak or post on behalf of our company without clear permission. Here, our goal is to address the customer's problem. Communications can best handle the customer's situation, working with the business or brand. Email them at nrg.communications@nrg.com to make them aware of what you saw.

Q: A co-worker and I follow each other on Facebook. My co-worker does not get along with our manager and posted derogatory comments about the manager's ability to lead the department. My co-worker's Facebook information shows current employment at our company. Do I need to do anything in this situation?

A: Posting about co-workers or employment issues on social media can reflect poorly on our company. Your colleague is not using good judgment and, depending on what's being posted, may even risk a lawsuit. We respect the right to freedom of speech, but we also expect our teammates' conduct to reflect our values, both online and in person. If you think your co-worker's comments are problematic, you should raise a concern to Corporate Compliance or Communications to clarify what is appropriate to post. Talent can help your co-worker address any legitimate concern.



**PLUG
INTO NRG**

If you'd like to contribute content or ideas to NRG, we want to hear from you!

Send your requests and ideas to [NRG Communications](#).

Follow, like, and subscribe to our NRG Accounts on [Facebook](#), [Twitter](#), and [LinkedIn](#).

Business record: Anything created for a business purpose, including such things as business documents, emails, and text messages.

Company assets: Any assets owned by NRG, including but not limited to everything from our accounts receivable and cash on hand to the energy we produce and the fuel we use to generate it. All equipment, systems, records, buildings, real estate, vehicles, plans, intellectual property, and anything owned or leased by NRG are also considered company assets.

Confidential and proprietary information: Any information that we are not authorized to disclose, whether general, technical, or business-related, that is not available to the public nor NRG's competitors.

Conflict of interest: A personal or business relationship that creates (or could create) outside influence on an employee's decision-making. This could mean the employee is not placing NRG first in business decision-making or could give the appearance of judgment being improperly influenced.

Protected class: A group of people with a common characteristic who are legally protected from employment discrimination on the basis of that characteristic. The following are defined as protected classes: race, color, religion, national origin, gender, age, disability, genetic information, marital status, gender identity or expression, sexual orientation, veteran status, and any other characteristic protected by law

Government and/or public officials: Employees and representatives including elected and appointed officials in governments, oversight agencies, and regulatory commissions.

Legal hold: A notice to keep records on file that are related to an ongoing or potential investigation or litigation.

Material fact: A fact that is significant, important, or essential in dealing with a competitor.

Material, non-public information: Any news, information or data related to a company that has not yet been made public and which an investor would consider relevant in making an investment decision.

Personally Identifiable Information (PII):

Information used to distinguish or trace an individual's identity (e.g., name, utility account number), either alone or when combined with other personal or identifying information linked or linkable to a specific individual (e.g., date and place of birth, mother's maiden name, home address, and other information that individuals may not wish to share publicly).

Restricted Personally Identifiable Information (RPII):

Information that, if disclosed without proper authorization, could create a substantial risk of identity theft (e.g., SSN, bank account number, and certain combinations of personally identifiable information).

