



Workplace Investigations Expectations Policy



Responsibility: Corporate Compliance
Owner: Chief Compliance Officer
Approved by:
Assistant General Counsel, Legal
Sr. Director of Corporate Compliance
Effective Date: October 2021
Revision History Located on last page

Purpose and Scope

NRG is committed to ensuring that all company-conducted investigations are performed in a fair, thorough and reasonably prompt manner in compliance with all applicable laws. NRG will initiate appropriate investigations into potential violations of law and NRG policies, rules and standards of conduct.

This policy applies to all employees of NRG Energy, Inc. and its subsidiaries. As appropriate, NRG will also investigate claims brought against, by or on behalf of applicants, contractors, vendors and any other individuals who conduct business with NRG. If there is a conflict between this policy and an applicable Collective Bargaining Agreement (CBA), the terms and conditions of the CBA will apply.

What are my Obligations During an Investigation

Employees, contractors and those doing business with NRG are required to truthfully cooperate with investigations conducted by NRG. NRG prohibits retaliation against any such individual who in good faith participates in an investigation. Any such individual who fails to reasonably cooperate with an investigation or who knowingly makes false or misleading statements or material omissions during an investigation will be subject to disciplinary action up to and including termination of employment or contract services.

Integrity of the Investigation

To the extent practicable and consistent with applicable law and company policy, the identity of the reporting party, information received during the investigation and details of the results of the investigation will be kept confidential and shared only on a need-to-know basis. The investigator will work in good faith to balance confidentiality with the requirement to conduct a fair investigation in line with NRG's legal obligations and ethical standards.

Participants in an investigation are not to attempt to intimidate or influence the testimony of potential witnesses. Additionally, to protect the integrity of the investigation, participants should refrain from discussing the investigation with others while the investigation is pending; provided however, that communication with the following persons or entities is permitted: a personal attorney, a union representative, a government agency, a non-employee family member or advisor, the investigator, the "Reporting and Compliance" contacts listed at the end of this policy, or as otherwise permitted by applicable law. Those who act contrary to this paragraph may be subject to disciplinary action up to and including termination of employment or contract services.

Application

Talent, in consultation with Corporate Compliance, is responsible for the implementation, communication and administration of this policy. This policy applies to any and all functions who may conduct an investigation such as Talent, Regulatory Compliance, Legal, Internal Audit, Safety, and Security.

Violation of this policy may result in disciplinary action, up to and including termination of employment or contract services.



Reporting and Compliance

The NRG Ethics Hotline and Alertline are available 24 hours a day, seven days a week. They are administered by an outside company to provide confidentiality and anonymity, if desired. Calls are not traced or recorded, and the Company does not keep any identifiable information regarding the sender of the online communication.

Anyone who believes that this policy or the spirit of this policy has been violated should report the matter for investigation. Policy violations and or suspected policy violations should be reported to:

- NRG Ethics Hotline 888.263.0463 or via the internet at nrg.alertline.com
- Michael Bramnick, Chief Compliance Officer – Michael.Bramnick@nrg.com or ethics@nrg.com
- Dan Garen, Vivint Chief Ethics & Compliance Officer – Daniel.Garen@vivint.com
- Corey Munch, Sr. Director Corporate Compliance – Corey.Munch@nrg.com
- Brian Curci, General Counsel – brian.curci@nrg.com
- Or speak to your Talent Business Partner

Version	Date	Author	Remarks
1.0	09/27/2021	Priscilla Garza, Human Resources	
2.0	6/21/2023	Priscilla Garza, Corporate Compliance	Updated to clarify Scope and Integrity of Investigation obligations