

POWERING NRG's VALUES

— SUPPLIER CODE OF CONDUCT —



A note from

MAURICIO GUTIERREZ

NRG president and chief executive officer

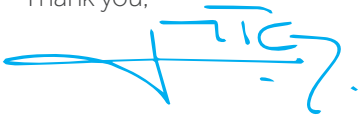
NRG conducts business with safety and integrity — from the board room to plant control rooms and from New Jersey to Houston to California — each and every day. Our core values unite us and serve as the foundation for ethical and responsible behavior toward each other, our business partners and the communities where we live and serve.

The Supplier Code of Conduct (the Code) builds on NRG's core values and is designed to provide suppliers, contractors and consultants with important guidance for the strategies, behaviors and decisions each of us must make on a daily basis. It also helps us take responsibility for and understand the risks we must address on our shared journey to create a sustainable energy future by safely providing reliable, cleaner power that enhances people's lives and delivers value to NRG stakeholders.

If you need help or want to report a concern, please contact the Ethics Alertline at nrg.alertline.com or the NRG Ethics Helpline at 888-263-0463, which, if desired, allow completely confidential and anonymous reporting.

It's all of us, working together, that make it a particularly special place, and I encourage you to lead by example whenever and wherever you represent NRG. It's not just good business practice — it's simply the right thing to do

Thank you,



Mauricio Gutierrez

President and Chief Executive Officer



The Supplier Code of Conduct builds on NRG's core values.



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What is the Code and what purpose does it serve?

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.

NRG's core values:

- S**afety
- T**eamwork
- R**espect for individuals, customers, community and the environment
- I**ntegrity
- V**alue creation
- E**xemplary leadership

Our values underlie our ethical decision making and are the foundation of NRG's culture.

This Code translates our STRIVE 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 specifically covers NRG's suppliers, contractors including its sub-contractors, and consultants ("Suppliers"). In addition, NRG expects all of the companies with which we do business to share, respect and act consistently with this Code and abide by the law.

Not every workplace situation will be covered by this Code nor does this Code 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 NRG's STRIVE values for both their employees and their subcontractors.

It is important 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.

Suppliers are responsible for ensuring that its employees and sub-contractors understand and comply with these standards. Suppliers may require its subcontractors to comply with this Code by insertion of these requirements in any subcontract pursuant to any goods and/or services to be provided as set forth 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 Alertline or the NRG Ethics Helpline.

NRG Ethics Helpline and Alertline

The NRG Ethics Helpline (888-263-0463) and Alertline (nrg.alertline.com) are available 24 hours a day, seven days a week. They 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.

Commitment

The strength of NRG depends on our promise to each other to live our core 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 that includes working collaboratively with a spirit of trust
- 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 and investigated appropriately and that 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 we 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 (888-263-0463) or Alertline (nrg.alertline.com).

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 core 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 (888-263-0463) or Alertline (nrg.alertline.com). Of course, acting with integrity and respect 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 noncompliance and cooperating in audits, investigations and appropriate requests for information.

If you receive a notice from NRG's Legal Department or 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, NRG's Legal Department or NRG Corporate Compliance immediately. Only NRG's Legal Department is authorized to respond to or accept the service of legal papers (such as subpoenas) on NRG's behalf.

For more information, see the section on Market Manipulation and Regulation on page 15.

Safety

A large industrial turbine component, possibly a compressor or turbine section, is shown in a factory setting. The component is massive, cylindrical, and features a complex, ribbed structure. It is mounted on a blue metal frame. A worker wearing a hard hat and safety glasses is visible in the foreground, looking at the component. The background shows other industrial equipment and a wooden floor.

At NRG safety always comes first.
It is the first and most fundamental of our core values.

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

Rule no. 1: If it's unsafe, don't do it

To ensure the health and safety of all, NRG and Suppliers:

- Watch for any unsafe or potentially unsafe situation and report it immediately
- Keep public safety at the forefront of our minds
- 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 your company's management and your 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 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

Suppliers may not use, possess, sell or 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 about anyone's ability to perform a job safely at NRG, speak up and tell your NRG Site Representative or contact the NRG Ethics Helpline (888-263-0463) or Alertline (nrg.alertline.com).

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, including building and residing in one of the country's most energy-efficient headquarters, 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 20.

Where can I report a safety or environmental concern?

- Your NRG Site Representative
- NRG Ethics Helpline (888-263-0463) or Alertline (nrg.alertline.com)

Conflict minerals

Supplier 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 US 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.

Teamwork

A photograph of two construction workers in safety gear. The worker in the foreground is wearing a white hard hat with a yellow stripe, sunglasses, and a light blue shirt. He is looking upwards and has his arms raised. The worker in the background is wearing a yellow hard hat, a white protective hood, and a high-visibility orange and yellow safety vest. They are both working on a structure made of metal beams.

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 not limited to) providing or offering a 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 NRG employee 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 NRG's Chief Compliance Officer may be necessary in certain situations.

Respect



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
- Age
- Marital status
- Physical or mental disability
- Sexual orientation
- Veteran status
- Other protected characteristic

Contact the NRG Ethics Helpline (888-263-0463) or Alertline (nrg.alertline.com) 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 NRG's core values of respect and exemplary leadership. NRG will not tolerate retaliation against Suppliers who report discrimination in good faith.

Fair employment 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 trafficking of person is prohibited.

Some Suppliers may be required to ensure background checks in accordance with NRG's requirements on their employees and its subcontractors' employees are conducted. NRG will notify the Supplier if such checks are required.

Keeping NRG harassment free

Teamwork and respect 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, or limits someone's performance or potential, and is 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
- Make 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 (888-263-0463) or Alertline (nrg.alertline.com) 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 NRG's values of teamwork, respect and exemplary leadership, such situations can be avoided.

Workplace violence prevention

NRG is 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 or 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.

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 and competitive data and intellectual property, which generally refers:

- 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



Integrity

Gifts and entertainment

Giving and receiving small gifts and sharing reasonable meals and appropriate entertainment are ways to connect with NRG employees and deepen business relationships. Integrity 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 that is 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 NRG's Corporate Compliance Department prior to the exchange.

Bribery, kickbacks and corruption

At NRG, we don't engage in bribery, kickbacks or 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 in it. More importantly, it is terribly destructive by distorting markets, dragging down economic development and wreaking havoc on local communities. That's why NRG knows and abides by applicable antibribery and anticorruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA). Also, 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 NRG's Chief Compliance Officer and NRG's Legal Department.

Where differences exist between this Code's guidelines and local, state or federal laws and regulations, 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 should 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 NRG Legal Department. Also, Suppliers shall not use NRG property, including computer systems and email addresses, for the benefit of political candidates or campaign or to 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 anticompetitive practices that could violate those laws or harm NRG's 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. 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; and
- 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 its 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 vital to both NRG's and our Suppliers' integrity, reputation and success.

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 that 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 nonpublic 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, nonpublic 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 United States 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 its Suppliers shall abide by these restrictions.

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. NRG 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, its employees and customers
- Damage or destroy property or materials belonging to NRG, its employees or customers
- Divert electric energy, natural gas, or any other product 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, recreate in whole or in part computer programs or related systems developed or modified by NRG personnel, or acquired from outside suppliers

Value creation



Protecting assets

Suppliers who utilize NRG assets have a responsibility to ensure that they keep them safe and use them efficiently. NRG's 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 come upon valuable business opportunities. Because these opportunities belong to NRG, Suppliers shall present them promptly to your NRG Site Representative so that NRG can evaluate them.

Use of NRG Information Technology systems

NRG's 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 system responsibly and primarily for the business purpose for which they are intended. NRG IT equipment and the messages, data, files and software stored or on transmitted on NRG IT systems are NRG property and 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 by NRG. Also, Suppliers shall have no expectation of privacy on the NRG network.

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 NRG's 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
- Nonpublic 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 person 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 request, 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 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 you are 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 nondisclosure agreement approved by the NRG Legal Department. NRG protects information received from Suppliers under a nondisclosure agreement as carefully as we protect our own.

The Supplier must notify their NRG Site Representative immediately in the event that 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).

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 nor otherwise 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 only orders 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

Requirements for retaining records are governed by various federal and state laws. Suppliers have an obligation to prevent 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're not sure of what's required, or if you become aware of a subpoena, pending or contemplated litigation, or a governmental investigation, notify NRG Legal Department immediately.

Public communications and media inquiries

NRG and its Suppliers have a responsibility to protect NRG's reputation and confidential information when communicating with the public. To ensure that NRG's 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 NRG's behalf nor are they permitted to respond to inquiries from news media, securities analysts and investors.

Social media

When used wisely, social media helps NRG connect with our customers and spread the word about NRG's 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 (888-263-0463) or Alertline (nrg.alertline.com) if you have any concerns about any information shared on social media.



Exemplary leadership

Sustainability

NRG works to create a world sustainable energy future safely providing reliable, cleaner power that enhances people's lives and delivers value to our stakeholders. NRG's decisions reflect our desire to set an example for the rest of the industry by producing affordable, safe, smart and reliable energy while continually growing our business. NRG develops innovations that have the potential to decarbonize our operations and extend the productive lives of our power plants, supporting our business and keeping sustainability at the heart of what we do.

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

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

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 in regard to 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 NRG's computer systems, email addresses or other property to express personal political views or to benefit a political candidate or campaign.

