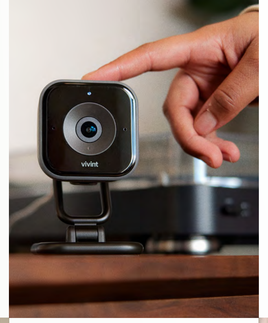
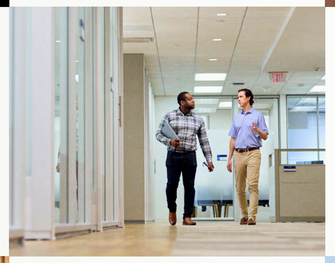
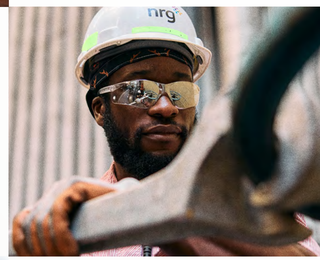
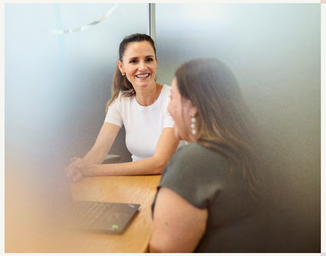
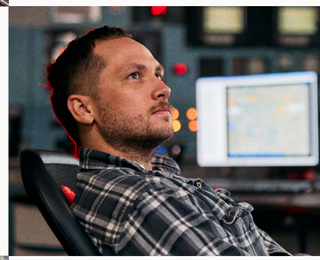
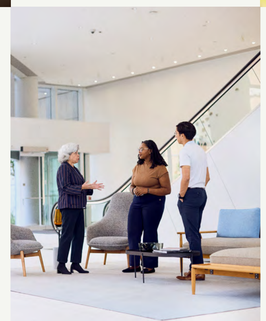
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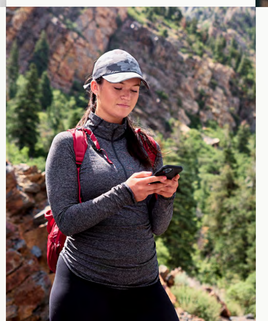





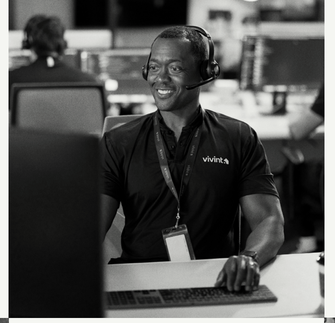
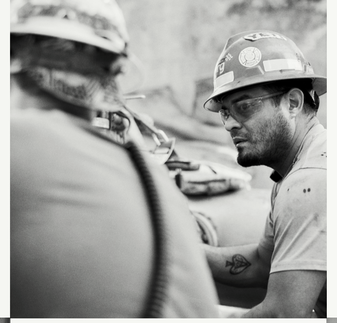
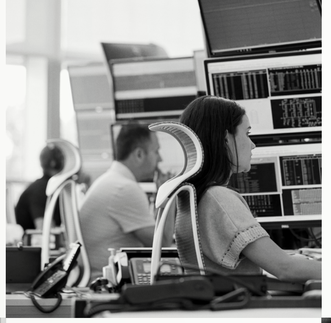
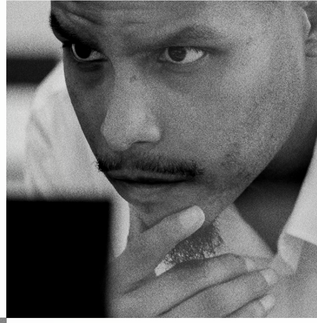




Light the Way

Code of Conduct

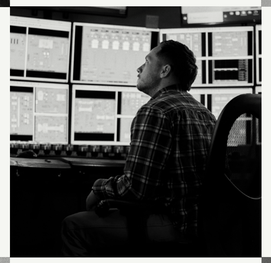


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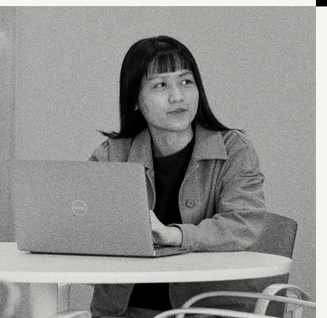
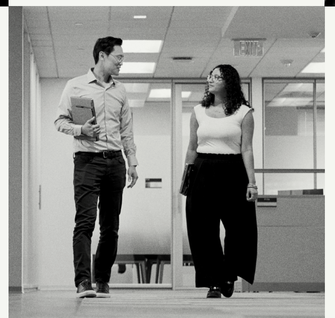













TOC

Code Introduction

TOC

Who We Are

NRG Energy, Inc. is not your typical energy company. We provide solutions for the future. We transform the customer experience. We are unlocking a world where innovation drives our businesses, homes, and communities of tomorrow. We are developing new tools and technology to make energy smarter, more dependable, and more sustainable for everyone.

With brands serving millions of customers, we work tirelessly to honor their trust. By following our Code of Conduct (“Code”), you are doing your part to protect NRG Energy, Inc. (“NRG” or the “Company”) and doing what’s right for our customers, business partners, and shareholders.

Our Code is more than a set of rules – it reflects our values. Our Code exists to guide you through your daily actions and decisions. It helps you act with integrity, respect, and accountability. As you read these expectations, remember that each section builds upon the last to create a culture where we can thrive and succeed together. Our values guide our actions as employees and shape how we serve our customers, collaborate with business partners, and build trust with investors, regulators, and other stakeholders. Together, these commitments define the Company’s impact and protect our reputation.



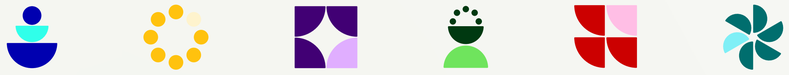
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Our Values on Display

Our values –

Do What's Right
Win Together
Wow Them
Stay Curious
Be Direct
and **Bring Passion**

– are at the heart of everything we do. They shape our decisions and our vision for the future. By living our values, we create a workplace where everyone can contribute, innovate, and succeed.





Do What's Right



Win Together



Wow Them



Stay Curious



Be Direct



Bring Passion

TOC

A Message from our President and CEO



I am pleased to welcome you to the NRG Code of Conduct. At NRG, our shared values are the foundation that connects our beliefs to our behaviors and reflects how we come to work each day. This Code is our shared commitment to operating with integrity, and it defines the standard every one of us is expected to meet.

Our values — *Do What's Right, Win Together, Wow Them, Stay Curious, Be Direct, and Bring Passion* — are non-negotiable. They are how we operate as one team, deliver for our customers and serve the communities that depend on us. We model these values every day, not just when it is easy or convenient. We build trust, respect our colleagues and hold ourselves to the highest standards.

We believe in creating lasting value for our customers who are at the heart of everything we do. Our focus every day is to solve future energy challenges for our customers, treat them with respect and honesty, and create a more sustainable, resilient, affordable and empowering energy ecosystem in the communities where we live and work.

Leadership is accountable. That is true at every level of this company. We are responsible for building high-performing organizations, empowering teams to accelerate execution and driving velocity in everything we do. We are also responsible for addressing performance honestly and fairly, because how we lead shapes the culture we create.

Professional growth is a priority here, and talent is a strategic advantage. That is why investing in our people, including development, safety, and well-being, is how we win, today and for the long-term.

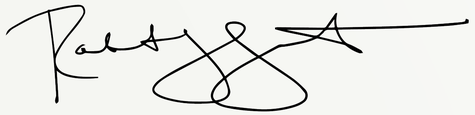
I ask each of you to read this Code, understand it and live it. If something does not feel right, speak up. We will listen, and we will act. That is how trust is built, and that is how we move forward together.

Thank you for all that you do to make NRG the company our customers and communities can count on. If you have any questions, you can reference the resources listed or contact ethics@nrg.com.

Robert Gaudette

—

President and Chief Executive Officer, NRG



TOC

A Message from our CCO



Dear Team,

I'm happy to welcome you to the NRG Code of Conduct.

The Code is our guide for upholding ethics and integrity every day. Our values are of the utmost importance and guide how we engage with one another, our partners, our customers, and the communities we serve.

Please take the time to carefully read and understand our Code and use it as a resource. If you have questions or would like to report a concern, you can reach out to your manager, your colleagues in Compliance or Legal, **ethics@nrg.com**, or the **Alertline**, where you can report anonymously. NRG has a strict anti-retaliation policy, protecting those who speak up in good faith.

The Code applies to us all. We set high ethical standards to reflect our unwavering commitment to ethical behavior, integrity, and accountability. By upholding these standards, we can all protect and strengthen NRG's reputation. Each of us has a responsibility to contribute to a positive, respectful, and supportive work environment.

Please understand that violations of the Code will not be taken lightly. Depending on the nature and severity of the misconduct, any employee who willingly violates our Code does not represent NRG's values and could face significant consequences, up to and including termination.

Thank you for your continued dedication and commitment to Doing What's Right. Together, let's continue to foster a workplace where integrity isn't just expected – it's embodied in everything we do.

Paolo Berard

—

Chief Compliance Officer and Assistant General Counsel



Table of Contents

03 **Code Introduction**
04 Who We Are
05 Our Values on Display

Leadership Messages
12 A Message from our President and CEO
13 A Message from our CCO

14 **Table of Contents**

16 **About Our Code**
17 Applicability
18 Integrity Matters
Reporting and Investigations
Anti-Retaliation Policy
20 Employee Accountability

23 **Our People**
25 Respecting Each Other
Anti-Harassment and Anti-Discrimination
Violence-Free Workplace
28 Safety and Well-being
Promoting a Safe Work Environment
Anti-Drug and Alcohol Use
31 Equal Employment Opportunity
32 Records Management
33 Data and Technology
Technology and Cybersecurity
Use of Artificial Intelligence and Emerging Technologies
36 Safeguarding Company Assets
Physical Assets
Digital Assets and Confidential Information
Intellectual Property
Protecting Non-Public Information
41 Making Ethical Choices
Financial Conflicts
Gifts and Entertainment
Conflicts of Interest
Interacting with Government Officials
45 Outward Communications
Social Media
Brand Ambassadors

49 **Customers**
51 Protecting Customer Information
52 Interacting with Government Customers
53 Customer Service and Marketing

55 **Business Partners**
57 Business Partner Relationships
58 Fairness in the Marketplace
Anti-Bribery and Anti-Corruption
Anti-Money Laundering
Anti-Competition and Antitrust
62 Export Controls, Embargoes and Sanctions Activities

64 **Investors and Regulators**
66 Ethical Trading Activities
67 Regulatory Expectations
68 Accurate Recordkeeping and Reporting
69 Public Communications

71 **Communities**
73 Charitable Contributions and Volunteering in the Community
74 Political Contributions
75 Human Rights
76 Protecting the Environment

78 **Disclaimers**


STRONG

TOC

About Our Code



TOC

Applicability

The Code applies to all of NRG's employees, officers, and directors. It can also apply to our business partners. We're all expected to be familiar with and follow the Code.



Integrity Matters
Reporting and Investigations

You can protect yourself, your colleagues, and NRG by raising integrity and compliance concerns. If something doesn't feel right, follow your instincts and raise a concern.

Never hesitate to speak up on behalf of yourself or others. NRG takes all reports of suspected policy violations seriously. When a concern is raised, NRG will conduct a prompt, fair, and impartial investigation per our **Workplace Investigations Expectations Policy** and applicable laws.

If you face a challenging situation or decision, you can make use of the following resources:

Your Manager or your Manager's Manager

Your Talent Business Partner

Corporate Compliance

Legal

The Ethics Toll-Free Helpline at:

1.888.263.0463	U.S. / Canada
1.844.237.5022	Mexico

Alertline

Ethics email:	**ethics@nrg.com**

If you bring up questions and concerns, we can quickly address the issue and avoid potential problems. You can use the Helpline or the **Alertline** if you want to remain anonymous. Both are available 24/7 and managed by an independent third party. The third party will document the information and give it to the right people. Please know no identifying information is kept or stored; you may remain anonymous.

Potential violations of the Code are taken seriously. NRG will address reported concerns in a prompt and respectful way. NRG will keep the information confidential throughout the process, which may vary based on the nature of the concerns.

Employees and contractors are expected to fully cooperate with investigations conducted by or for NRG. All employees must offer honest and complete information and respond to inquiries. It is important to respect and preserve the investigative. Employees and contractors are prohibited from acting in a way that could undermine the investigation. This type of behavior includes intimidating or trying to improperly influence witnesses or other participants. Violations may result in disciplinary action, up to and including termination.

To the extent practical and consistent with applicable law and Company policy, information will remain confidential. It will only be shared on a need-to-know basis. This can include the identity of the reporting party, data received, and details on the investigation results.

Substantiated allegations may result in discipline.

Integrity Matters
Anti-Retaliation Policy

At NRG, we have zero-tolerance for retaliation. We will protect those who raise a concern in good faith about a possible violation of the Code, laws, or regulations from retaliation. NRG will investigate potential violations and take action based on the outcome.

Zero-tolerance means all forms of retaliation are prohibited. Retaliation includes threats, intimidation, reassignment, reduction of hours, demotion, firing, or any other negative consequence directed against an employee because they raised a potential ethics or compliance issue.

Anyone who retaliates may be disciplined, up to and including termination, including officers of NRG.

Employees who have questions on retaliation or would like to report a concern should contact Talent & Culture, Compliance or may file a report through the Ethics Helpline or **Alertline**.



TOC

Employee Accountability

Our people shape the organization's ethical culture.

By upholding the Code and Company policies, each of us plays a vital role in fostering a culture of integrity, trust, belonging, and care. Our reputation depends on it. The choices we make – individually and as teams – have an impact on our culture and organizational success. By owning our actions and embodying our values, we make NRG a better company.



We each can make a positive impact by:

- Being familiar with Company policies and rules that apply to our jobs
- Being aware of who will be affected by our decisions
- Prioritizing our own well-being while looking out for colleagues
- Understanding our legal and ethical obligations
- Consulting with those who have specialized knowledge and experience that can help us
- Standing for NRG's values and using them to guide our decisions and actions

Managers have special additional responsibilities related to matters covered in the Code.

Our managers and supervisors promote our values by:

- Leading by example and staying aware of how our behaviors and decisions influence others
- Helping team members understand their responsibilities in upholding our Code
- Promoting a positive workplace, where everyone feels empowered to do the right thing
- Actively encouraging team members to come forward with ideas, questions, or concerns and then responding promptly and respectfully, escalating whenever necessary to Talent & Culture or Compliance
- Monitoring the emotional and physical well-being of the team and responding swiftly when reports are brought to their attention

TOC

Employee Accountability

Help is always available.
Start by asking questions and consider the following:

What's happening or at risk?

Unsafe situations or physical danger

Unethical or inappropriate behavior

Questionable transactions or decisions

Potential loss, damage, or harm

Ask yourself :
What's really going on?

Who could be impacted?

Our colleagues

Customers

Investors, regulators, or the public

The communities we serve

Consider :
Who relies on us, and who might be affected by our actions or inaction?

How should we respond?

Act ethically and with integrity

Care for others and fulfill our obligations

Listen to your conscience and do what's right

Follow the law, regulations, company policies, and our commitments

Reach out for help: Supervisor, Compliance, Legal, Talent & Culture

Focus on building trust, serving others, and protecting our brand

Remember :
How we act shapes our relationships, our service, and NRG's reputation.



TOC

Our People



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We deserve a workplace where we look out for one another and act with integrity, setting the ethical standard for NRG and creating a professional environment where everyone can thrive.

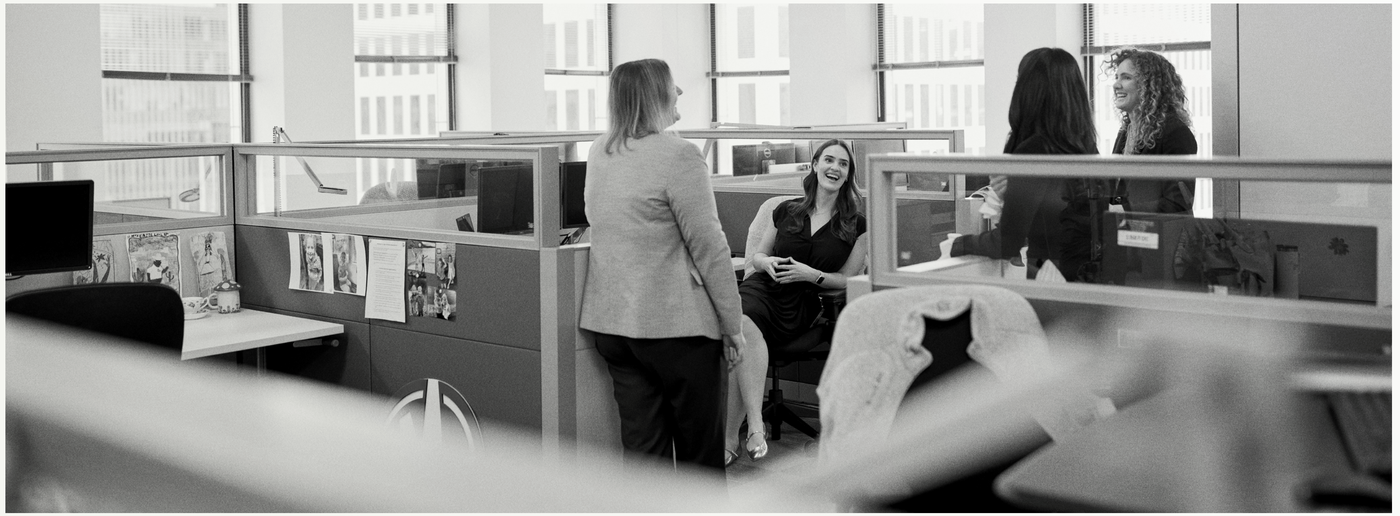
TOC

Respecting Each Other

Why it matters

The best ideas come when diverse perspectives are shared in an environment of mutual respect. Open, direct communication helps our teams clearly understand goals and expectations. Disagreements will happen – and that's okay – if we are direct and approach them with professionalism and a genuine respect for one another's viewpoints.

There is no place at NRG for harassment of any kind, nor acts or threats of violence, because we all deserve a workplace where we are met with dignity and fairness, and one where we feel respected and safe.



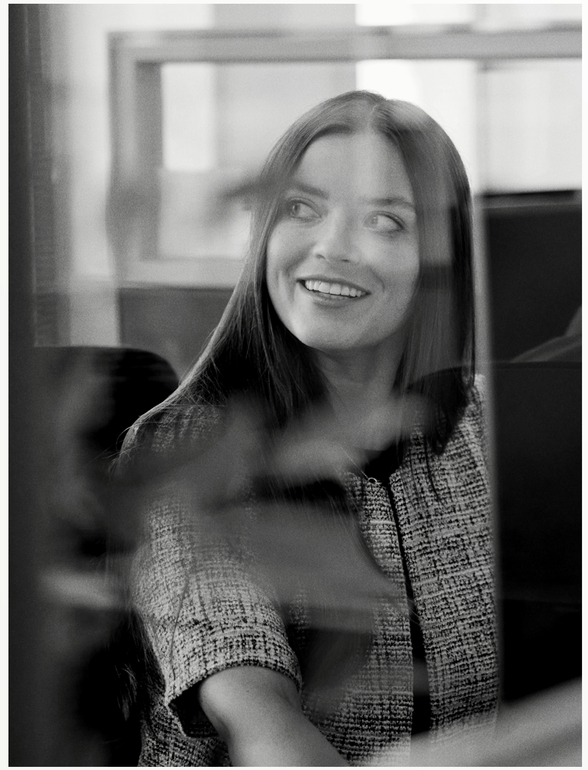
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Respecting Each Other
Anti-Harassment and Anti-Discrimination

How we act

Promote a workplace based on respect and merit by:

- Recognizing the worth of every person by actively seeking out other opinions and methods
- Encouraging others to speak up so that we can gain from each other's ideas and talents
- Creating an inclusive and collaborative environment
- Speaking directly, listening actively and always being thoughtful about how our words and actions can make others feel
- Embracing our differences to strengthen our teams
- Allowing our colleagues to make mistakes and express themselves without fear of negative consequences
- Having zero tolerance for bullying or harassment
- Immediately reporting any concerns to your manager, Talent & Culture, Compliance, or through the Ethics Helpline at 1.888.263.0463 or **Alertline**



TOC

Respecting Each Other
Violent-Free Workplace

How we act

Create a safe and respectful workplace by:

- Being mindful with others and respecting their personal space
- Keeping our interactions free from all forms of violence, including verbal and physical threats, and confrontations
- Not engaging in acts that could cause others to feel unsafe
- Looking out for each other
- Listening, offering emotional support, and asking for help when needed
- Having zero tolerance for any forms of abusive conduct or intimidation
- Voicing concerns about any threats and acts of intimidation or harm to your manager, Talent & Culture, Compliance, or Enterprise Security

Additional resources:

- **Harassment-Free Workplace Commitment Policy**
- **Workplace Violence Prevention Policy**

Did you know?

Every employee plays a key role in keeping our workplace safe. NRG does not tolerate any form of violence, threat, or intimidation, including jokes or online posts. Report these instances right away to your manager, Talent & Culture, Compliance, and/or Enterprise Security.

By building an inclusive workplace, we lay the foundation for a safe and healthy workplace for everyone at NRG.

TOC

Safety and Well-Being

Why it matters

We do not compromise when it comes to safety and well-being – our own or that of others. When we prioritize our safety and well-being, we bring out the best in our teams, allowing us to deliver quality service to our customers.



TOC

Safety and Well-Being
Promoting a Safe Work Environment

How we act

Promote a safe work environment by:

- Prioritizing safety every day at NRG
- Taking precautions, especially when we are working in a hazardous environment
- Understanding how to safely work in areas with circuit grounding, confined spaces, or an increased risk of falls
- Always being aware of ourselves and others in our surroundings
- Teaming up with Safety to understand specific tasks, jobs, and safety responsibilities
- Immediately reporting accidents, unsafe conditions, near-misses, or security concerns to Safety, Security, your manager, or a supervisor
- Being free from the influence of alcohol and prohibited drugs
- Only using prescribed medications that do not impair while on the job
- Adhering to NRG's requests for drug and alcohol screenings at any time or for searches when entering NRG's premises



TOC

Safety and Well-Being
Anti-Drug and Alcohol Use

How we act

Conduct ourselves responsibly by:

- Being our best selves, free from the influence of alcohol, prohibited drugs, or other impairments (such as sleep deprivation)
- Acting with dignity and respect when attending events
- Taking care to avoid becoming impaired or intoxicated at events where alcohol is served
- Only using prescribed medications that are allowed by law when working or on NRG property
- Complying with NRG's requests for drug screening tests at any time or with searches when entering NRG's premises

Our values in action:

Q I was recently diagnosed with a medical condition and now take a certain medicine. I take the medicine three times a day. Can I bring my medication onto NRG property so I can take it on time?

A With a valid prescription, you can bring your medication to work. The medication should be stored securely while it is on NRG premises. Please refrain from any activities prohibited by your doctor in your role and ask your manager to help in reassigning responsibilities you are no longer able to perform.

Additional resources:

- **Key Rules of Safety Policy**
- **Corporate Safety Manual**
- **Drug and Alcohol-Free Workplace Policy**

Did you know?

NRG has resources to help make safety part of your everyday.

- The Corporate Safety Manual can provide information on safe practices at work.
- You or your dependents can use the **Employee Assistance Program** confidentially to find out about topics like substance abuse and potential treatment options.

A safe and supportive workplace creates the foundation to support equal opportunity at work.

TOC

Equal Employment Opportunity

Why it matters

Our organization depends on the collective talents of our passionate colleagues. By embracing new perspectives, we solve complex challenges together. We want everyone to have the access and opportunity to learn and develop. Our careers highlight our merit and skills, so we can feel fulfilled in our roles and serve our customers and communities.

How we act

Uphold our commitment by:

- Recruiting and making employment-related decisions on their experience, skills, and merit
- Accommodating reasonable requests from our teammates
- Respecting our colleagues and potential hires who have disabilities or religious needs
- Encouraging everyone to grow in their careers
- Combating prejudice or unfairness when evaluating employee readiness



Additional resources:

- **Equal Employment Opportunity Commitment Policy**

We are committed to acting with integrity in our day-to-day and giving respect to our people and treating everyone with respect.

TOC

Records Management

Why it matters

NRG needs to be proactive in protecting our records. Information should only be accessed by the right people and in the proper way. Today, outdated information, data breaches, and unauthorized access pose serious risks to our Company and our business. With effective, consistent, and responsible records management, we can prevent potential threats to our people.

How we act

Manage and keep records responsibly by:

- Remembering that everyone is responsible for the upkeep of our records
- Following NRG's retention schedule to securely keep and destroy records
- Keeping an eye out for any retention and preservation notices received from Legal (i.e., Legal Holds)
- Filing or storing records in approved locations, which can include NRG systems, platforms, or physical locations
- Never using communication platforms that make messages inaccessible or disappear
- Notifying Legal of any complaint, demand letter, or other proceeding related to our records

Additional resources:

- Records Management Policy
- Records Retention Schedule
- Acceptable Use Policy
- Mobile and Personal Device Use Policy

Our values in action:

Q Taylor uses apps, like Snapchat, Signal, or WhatsApp, to discuss operational issues and customer matters because it's his customers' preference. Is this allowed?

A No. These messaging apps allow users to send messages that disappear after a set period of time. Important business communications must be documented and kept according to NRG's policies. Only approved messaging applications may be used to conduct business on behalf of NRG.

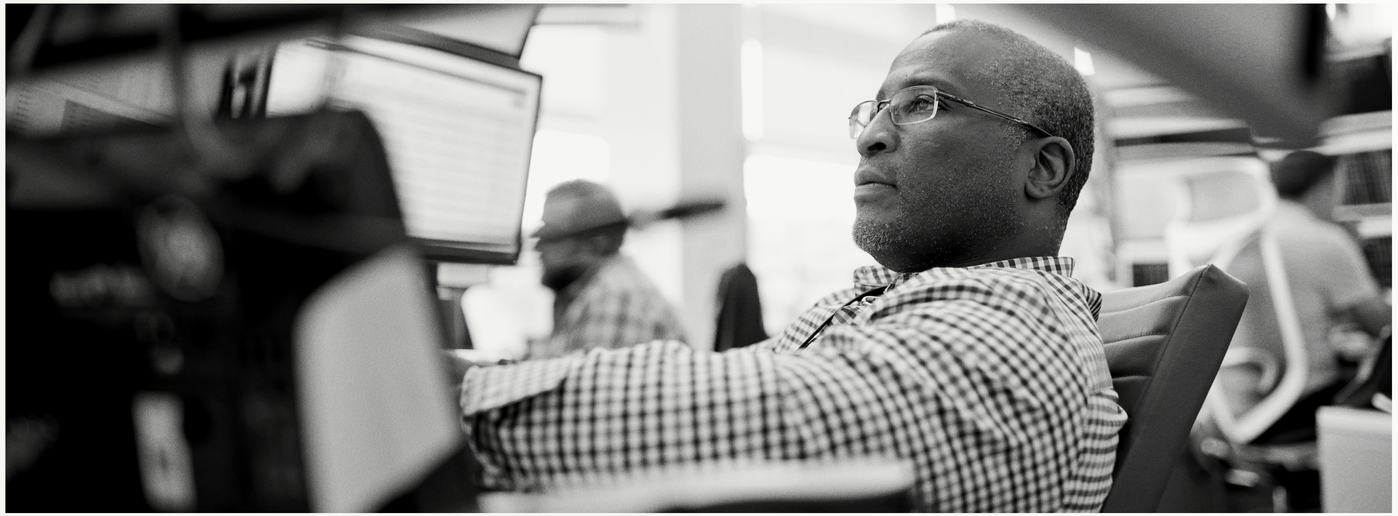
Effective records management supports our efforts to protect Company information and technology.

TOC

Data and Technology

Why it matters

In today's world, technology is constantly evolving. New technologies and AI can streamline our work but must be used responsibly to defend our data and uphold our values. By following our cybersecurity protocols, we can identify risks and cyber threats. Together, we defend our organization and build trust in the stakeholders that rely on us.



TOC

Data and Technology
Technology and Cybersecurity

How we act

Help avoid and mitigate cyberattacks by always:

- Using the equipment, systems, networks, and servers owned and approved by NRG when doing our work
- Completing our trainings on cybersecurity and understanding how it applies to our work
- Only using NRG-approved software and applications on work devices
- Keeping NRG's information safe by using a VPN when working outside of our offices
- Keeping our passwords private or using NRG-approved password managers to store and create hard-to-guess passwords
- Taking care not to leave Company assets unattended to prevent loss, damage, destruction, and theft
- Always locking your computer – even when stepping away for brief periods
- Verifying unknown links and checking URLs before using them
- Reporting suspicious emails, links, or concerns to the Cyber Integration Center right away
- Sending confidential or sensitive information using encryption and through secure, approved technology platforms

TOC

Data and Technology
Use of Artificial Intelligence (“AI”) and Emerging Technologies

How we act

Use AI responsibly by:

- Conducting all AI-related work using accounts and devices owned by NRG
- Never inputting confidential or customer data when using public AI tools
- Getting approval from the Cybersecurity Integration Center or AI Governance Team before downloading or using new AI tools
- Following NRG’s AI Policy and all applicable laws when working with approved AI systems
- Carefully checking the output of an AI tool for accuracy and relevance
- Disclosing our use of AI in our communications and our decision process
- Having our supply chain review new and current engagements for vendors with AI
- Asking our AI Governance Team questions on potential AI use at **AIgovernance@nrg.com**

Our values in action:

Q I have a tight deadline to meet, and I need to summarize a confidential financial report quickly for the upcoming Board meeting. I was thinking of using ChatGPT to generate a summary for me. Would it be okay to use ChatGPT for this task?

A Although AI tools are helpful when carrying out longer or more difficult tasks, ChatGPT is a public AI system. NRG’s information must never leave our network or be uploaded to an unsecured AI system such as ChatGPT. Only approved AI tools should be used.

Additional resources:

- **Acceptable Use Policy**
- **Mobile and Personal Device Usage Policy**
- **AI Policy**

Did you know?

Signs of a suspicious or “phishing” email can include misspelled words, errors in grammar, low-resolution logos, misleading domain names in the URL, or request for personal information. Trust your instincts when it comes to any emails or texts that seem unusual or unexpected. When in doubt, check with the Cyber Integration Center by emailing **spam@nrg.com**.

Protecting our digital and physical assets is essential to supporting operational excellence and trust.

TOC

Safeguarding Company Assets

Why it matters

Our physical and digital assets are essential to everything we do — from routine daily operations to breakthrough innovations that elevate the customer experience. Whether it's data or equipment, these tools are vital to our work, and we all have a role to play in using them responsibly and protecting them from misuse.



TOC

Safeguarding Company Assets
Physical Assets

How we act

Safeguard Company property by:

- Taking care to prevent loss, damage, destruction, and theft
- Staying alert to avoid fraud or unauthorized use
- Never moving or transporting NRG property without permission, and never taking Company assets to countries or locations that are risky or prohibited
- Following security and access requirements to protect our facilities
- Always displaying your badge on NRG property
- Having visitors sign in and escorting them while on NRG's premises



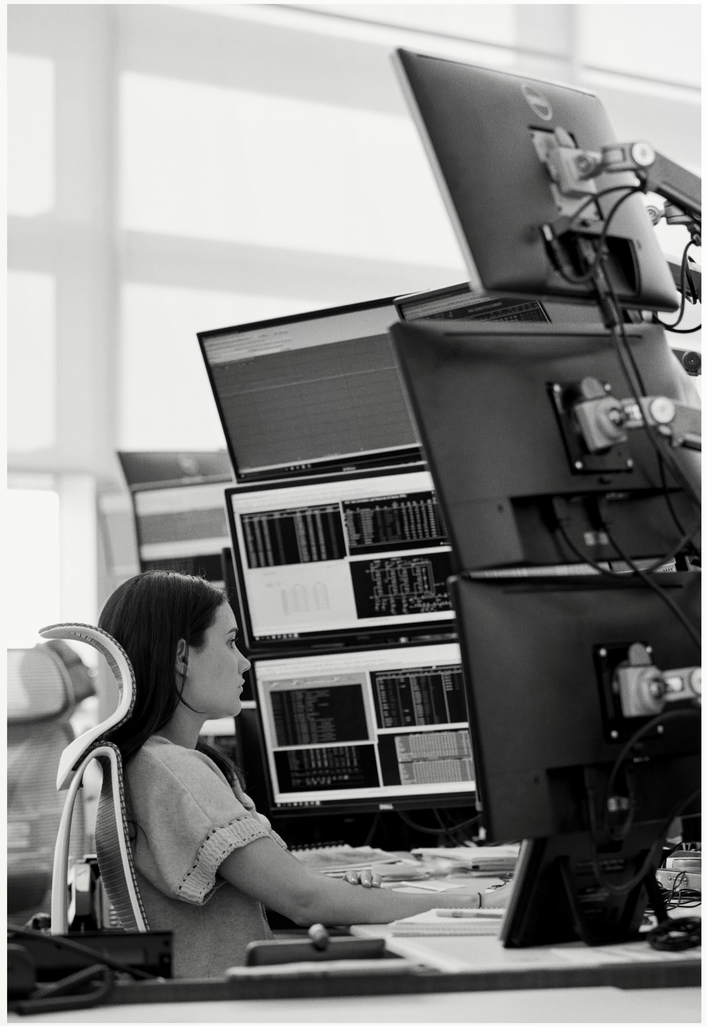
TOC

Safeguarding Company Assets
Digital Assets and Confidential Information

How we act

Use NRG systems and data responsibly by:

- Only using approved software on NRG devices and limiting access to NRG systems from personal devices
- Following our cybersecurity policy when working with NRG's systems, data, and AI tools
- Regularly reviewing system access requests and updating access as job roles change
- Never sharing or writing down your login information and passwords
- Having confidential discussions in private where others will not overhear
- Asking Legal to make sure we only share information with third parties who have a business need for it
- Knowing that our confidentiality obligations continue after we leave NRG



TOC

Safeguarding Company Assets
Intellectual Property

How we act

Protect NRG's intellectual property ("IP") by:

- Knowing the different types of IP which includes patents, copyrights, software, inventions, designs, trademarks, trade secrets, proprietary information, and more
- Understanding how different IP is owned and used throughout the organization
- Using formal agreements when sharing or receiving IP with external parties
- Limiting access of IP to those colleagues and business partners who need it for their work
- Respecting the IP rights of our competitors and other companies
- Reporting any suspected or actual misuse or theft of our IP to your manager, Legal, or the **Alertline**



TOC

Safeguarding Company Assets
Protecting Non-Public Information

How we act

Avoid insider trading by:

- Following NRG's policies and applicable laws when buying or selling stock
- Protecting non-public information about NRG and its third parties
- Only sharing information with colleagues on a need-to-know basis
- Being aware of and reporting any actual or perceived instances of insider trading
- Avoid having discussions about private information with our colleagues in public places
- Reporting any suspicious behavior right away to your manager or through the **Alertline**
- Proactively asking Legal questions you may have about the purchase or sale of stock

Additional resources:

- **Acceptable Use Policy**
- **Mobile and Personal Device Usage Policy**
- **Intellectual Property Policy (Inventions Policy)**
- **NRG's Cybersecurity Incident Response Plan**
- **Securities Trading and Non-Disclosure Policy**
- Contact Cybersecurity Integration Center with any questions at **cybersecurity@nrg.com**.
- Contact NRG's AI Governance Team for questions on approved tools at **AIgovernance@nrg.com**.

What is confidential and proprietary information versus material information?

Confidential and proprietary information: This refers to data, knowledge, or materials that are owned by a company and not publicly available. This information is sensitive, and its unauthorized disclosure, use, or access could harm the company. Examples include trade secrets, business strategies, financial data, customer data, client lists, technical processes, product designs, use of software, and internal confidential communications.

Material information: Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold, or sell a security. Remember that even if the information is not material to NRG, it may still be material to another company and our policies would apply.

Protecting our assets includes respecting the rights of others and strengthening our reputation.

TOC

Making Ethical Choices
Financial Conflicts

Why it matters

We win business and build relationships through mutual value—not through inappropriate gifts, expenses, or personal financial interests that could compromise our objectivity. Employees should avoid situations where personal financial interests could influence, or appear to influence, their business judgment regarding NRG. When making decisions, we must use our best judgment to avoid conflicts of interest and protect NRG's reputation.



We avoid financial conflicts of interest by:

- Never participating in prediction markets, event contracts, or similar platforms where NRG, its operations, business activities, or securities are the subject of a wager, prediction, or financial position.
- Never participating in prediction markets where the bet or prediction involves the use, disclosure, or potential misuse of confidential, proprietary, or other non-public information obtained through your employment or affiliation with NRG, its affiliates, customers or suppliers.
- Never sharing non-public information obtained through your NRG employment with others, or encouraging anyone to bet, buy, sell, or trade based on such information.
- Avoiding any participation that creates an actual or apparent conflict of interest or that could expose NRG to legal, regulatory, or reputational risk.
- Disclosing to Compliance, and obtaining approval for, any personal financial interest or benefit from a supplier, vendor, customer, competitor, or other third party that could influence, or appear to influence, your business judgment or NRG's business decisions.
- Refraining from any outside business, consulting, or investment activities that conflict with your responsibilities to NRG.

TOC

Making Ethical Choices
Gifts and Entertainment

How we act

Make ethical choices when it comes to gifts and entertainment by:

- Exchanging business courtesies that are legal, proper, not excessive in value, and in line with our policy
- Never asking for a courtesy from our suppliers or other business partners
- Notifying our managers and Compliance of gift and entertainment offers
- Recording all business courtesies per NRG policy
- Asking Compliance if you are unsure if a business courtesy is allowed



TOC

Making Ethical Choices
Conflicts of Interest

How we act

Avoid conflicts of interest by:

- Being transparent about our personal and business relationships
- Knowing these relationships can include other work, substantial investments, board positions, non-profit memberships, professional associations, and more
- Reporting any instance that could conflict with NRG's interests or your own
- Informing Compliance and getting approvals beforehand if you plan to start your own outside business
- Keeping our decisions at work free from the desire to favor family and friends
- Never using our positions at NRG for personal gain
- Understanding that relationships can change over time and the importance of reporting these changes
- Informing Talent & Culture of a personal relationship with a colleague
- Seeking approval when you are pursuing or offered a board position

TOC

Making Ethical Choices
Interacting with Government Officials

How we act

Interact with government officials responsibly by:

- Following NRG's rules on lobbying
- Never offering, promising, or giving anything of value to a public official or a member of their family
- Understanding any information shared with an official may become public
- Asking for approval before making a contribution to a local or state official and their campaign
- Notifying Government Affairs if you are contacted by a public official

Additional resources:

- **Gift and Receipt of Business Entertainment Policy**
- **Anti-Bribery and Corruption Policy**
- **Anti-Bribery and Corruption Toolkit**
- **Policy and Guidelines for Lobbying and Entertaining Public Officials in Texas**
- **Political Contributions Policy**

The conflict-of-interest checklist

- Understand and review our policies about conflicts of interest.
- Name any business relationships, including financial, even if not directly related to your position at NRG.
- Disclose any relationships with vendors, suppliers, or business partners to Compliance.
- Assess your personal relationships inside and outside of NRG and follow NRG's nepotism guidelines.
- Disclose and seek Compliance approval for any outside employment or Board participation, including for not-for-profits.
- If you experience a change that creates a conflict of interest, email Compliance and Talent & Culture.
- If you are a member of the Board of Directors, you must disclose personal interests or other situations that might give 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.

How we communicate to others reflects our commitment to NRG's values.

TOC

Outward Communications

Why it matters

The NRG brand is embodied by all who work for and with NRG. When we present ourselves as part of the NRG team, whether in person or through our online presence, it's important that we remain professional and keep our values top of mind. Employees are ambassadors of the Company in all settings, whether wearing branded items, communicating online, or interacting in public. What you say, share, and how you present yourself influences public perception of our brand. Always communicate and behave in a way that demonstrates NRG's values and professional standards.



Outward Communications
Social Media

How we act

Represent NRG responsibly on social media by:

- Using social media to strengthen our brand and represent our values
- Acting in a professional manner online
- Understanding that we represent NRG when we post photos that include NRG's (or any of our other brands') apparel and other items
- Clearly stating the opinions you express about politics or our industry are solely your own and not NRG's views
- Never saying your posts, shares, or comments are an official statement from NRG or a representative of the Company
- Only posting information that is publicly available about our Company
- Avoiding mentioning any information about our customers and suppliers

TOC

Outward Communications
Brand Ambassadors

How we act

Help protect the NRG brand by:

- Being genuine and respectful of others
- Embodying NRG's values when wearing or speaking for any of our brands
- Understanding the impact actions and behaviors may have on NRG, our reputation, and our brands
- Being mindful of communications outside of work, as they may be taken to reflect NRG's position on certain topics
- Sharing the information curated for public use by NRG

Additional resources:

- **Communications Policy**
- **Social Media Policy**
- **Acceptable Use Policy**

How to be a Brand Ambassador online

Do	Keep social media professional when your connection to the Company is visible or implied.
Don't	Post or engage with content that could damage the Company's reputation.



TOC

Customers



TOC

Our customers place their trust in us. We then enhance this trust by protecting their information, honoring our commitments, and delivering our services with integrity and respect.

TOC

Protecting Customer Information

Why it matters

Our customers trust us with their personal information, and it's our responsibility to honor that trust. We keep our customers' information private –- disclosing data only when there is a legitimate business need and a legal right to collect it.

How we act

Protect customers' personal information by:

- Recognizing when we collect customer personal information, using the information solely for the purpose for which it was collected, and storing it securely
- Following our policies and procedures and complying with all applicable personal information and data privacy laws
- Never storing customer data on non-NRG assets
- Consulting with Compliance, Legal, or your manager before granting access to customers' personal information
- Destroying our customers' personal data as required or removing any identifying information

Additional resources:

- Acceptable Use Policy
- Mobile and Personal Device Usage Policy
- Records Management Policy
- Privacy Policy

What is customer information?

Customer data and personal information refer to any information that can be used to identify an individual, such as names, contact details, and demographic information.

Protecting customer information is critical to building trust, especially when serving our government customers.

TOC

Interacting with Government Customers

Why it matters

Our partnerships with government agencies require us to follow specific requirements. We are dedicated to honoring our government contracts with integrity and executing them with care.

How we act

Interact with government customers by:

- Having Compliance and Legal review our agreements with agencies before signing the contract
- Performing all tasks and services as agreed in our federal and state contracts
- Following all federal and state guidelines to protect our information
- Giving complete and correct information to our government customers
- Avoiding any actual or perceived conflicts of interest with federal or state employees
- Following all applicable laws in our work with federal, state, and local entities

Additional resources:

- Anti-Bribery and Corruption Policy
- Anti-Bribery and Corruption Toolkit

Our dedication to excellence in serving government customers also guides our approach to all of our customers.

TOC

Customer Service and Marketing

Why it matters

We always strive to go above and beyond for our customers. Our customers choose who they do business with, and in choosing us, they have trusted us to deliver exceptional service and treat them with honesty, respect, and fairness.

How we act

Serve our customers by:

- Informing our customers about our offers and explaining each in a clear and easy-to-understand way
- Making sure that claims related to NRG products and services are truthful
- Emphasizing our product strengths without disparaging our competitors
- Asking Legal to review new products, services, and marketing supplies to confirm we meet all legal and regulatory requirements
- Never taking shortcuts that compromise the safety or quality of our products and services





TOC

Business Partners



TOC

We win with the right partners by our side. We expect our business partners to act with integrity, just as we do. By holding each other to high standards and working transparently, we build strong relationships that move NRG forward.

TOC

Business Partner Relationships

Why it matters

Our relationships are key to our success. Our business partners are expected to act in a responsible, transparent, ethical, and sustainable way. In turn, we treat our partners with the same integrity and respect we expect of them.

How we act

Manage business partner relationships by:

- Treating all business partners equally and fairly in our selection process
- Doing business with those who best meet our standards and share our values
- Conducting the required due diligence, such as background and conflict-of-interest checks
- Responding to due diligence requests in an efficient and proper way
- Measuring our partners on qualities such as price, value, reliability, and reputation
- Avoiding the appearance of actual or perceived conflicts of interest and informing Compliance if new situations arise
- Ensuring that all purchases of software or technology services, or assets are completed through the NRG Technology Department

Additional resources:

- **Acceptable Use Policy**
- **NRG Cybersecurity Incident Response Plan**
- **Gifts and Recipient of Business Entertainment Policy**
- **Inventory Policy**
- **Nepotism Policy**

Who are our business partners?

Suppliers, Vendors, Distributors, and our Strategic Partners

Maintaining strong, ethical supplier relationships extends to every aspect of the marketplace.

TOC

Fairness in the Marketplace

Why it matters

We are committed to supporting fairness in the marketplace. NRG holds itself to the highest standards of ethical conduct in everything we do. This includes obeying all laws surrounding Anti-Bribery and Anti-Corruption (ABAC), such as the Foreign Corrupt Practices Act (FCPA), Anti-Money Laundering (AML), and Anti-Competition and Antitrust.



TOC

Fairness in the Marketplace
Anti-Bribery and Anti-Corruption

How we act

Conduct business honestly by:

- Following all relevant anti-bribery and corruption laws, including the FCPA and Corruption of Foreign Public Officials Act
- Never offering, giving, asking for, or accepting bribes or kickbacks
- Having regular due diligence reviews of our third parties
- Making clear to our business partners and vendors that NRG does not accept or offer bribes
- Reporting any bribery or corruption concerns right away to Compliance or Legal



TOC

Fairness in the Marketplace
Anti-Money Laundering



How we act

Avoid AML concerns by:

- Verifying our customer information before relying on it
- Keeping complete and correct records
- Reporting suspicious activity to your manager or Compliance, and to the authorities when needed
- Having our third-party partners follow all applicable AML laws



TOC

Fairness in the Marketplace
Anti-Competition and Antitrust

How we act

Promote fair competition by:

+ Avoiding agreements with a competitor that could result in fixed prices or rigged bids
+ Creating fair agreements with our suppliers, partners, or customers
+ Asking Compliance or Legal when we have questions related to competition or antitrust concerns

Our values in action:

Q During a conference, a competitor suggested we could both benefit by agreeing to set similar prices for our products. How should I respond?

A We can politely decline and report the conversation to Legal. By sticking to the right conversation topics and actively reporting concerns, we can support fair market practices.

Additional resources:

- Anti-Bribery and Corruption Policy
- Anti-Bribery and Corruption Toolkit
- U.S. Pay to Play and Canada Political Contributions Policy
- Risk Management Policy
- Gifts and Receipt of Business Entertainment Policy
- NRG Energy Trading Compliance Policy

In addition to having integrity in our business dealings, we follow the international trade laws and regulations that govern how we work.

TOC

Export Controls, Embargoes, and Sanctions Activities

Why it matters

We are committed to the international trade laws that apply to our industry. When we follow these rules, we can be a responsible trade partner who contributes to the world using ethical business practices.

How we act

Act as a responsible trade partner by:

- Knowing and following the applicable trade laws and regulations
- Never doing business with countries, parties, or entities that are the subject of trade embargoes or sanctions
- Never taking part in or promoting boycotts that our government does not support
- Regularly holding due diligence reviews on our international partners

Additional resources:

- **Risk Management Policy**
- **Anti-Bribery and Corruption Policy**
- **Human Rights & Social Responsibility Standards for Manufacturers**
- **NRG Energy Trading Compliance Policy**

Did you know?

You can reach out to Compliance or Legal to learn more about the active sanctions, export controls, and embargoes that affect our industry and supply chains.


28 - 51
13
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18
M

TOC

Investors and Regulators



Trust and transparency are at the heart of our business. By acting ethically, with integrity and accuracy, we protect our reputation and deliver lasting value to our shareholders.

TOC

Ethical Trading Activities

Why it matters

Our investors trust us to create and deliver long-term value in an ethical way. In our marketplace, we are committed to fairly trading and promoting power, gas, smart home devices, and renewable credits.

How we act

Trade commodities responsibly by:

- Having a genuine business purpose before we trade with others
- Never taking part in a deal that is, or could have the appearance of being, fraudulent, deceitful, or a violation of law, rules, or regulations
- Keeping complete and correct documentation of all commercial and trading activity
- Conducting due diligence on the third parties that we do business with
- Reaching out for advice and training resources from Risk, Compliance, and Legal
- Providing truthful and reliable information internally as well as to regulators and market monitors

Additional resources:

- **Energy Trading Compliance Policy**
- **Risk Management Policy**
- **Records Management Policy**

Upholding our industry's ethical standards is essential to meet the evolving expectations of our regulators.

TOC

Regulatory Expectations

Why it matters

We are a public company that serves customers in the U.S. and Canada. To uphold our regulatory commitments, we stay ahead of evolving guidance in both countries. We regularly review new guidance and update our policies to deliver on our investors' expectations.

How we act

Interact with our regulators by:

- Knowing and following all of the regulations and guidance for our industry
- Understanding the scope and goals of our regulatory audits
- Gathering the needed documents and data for our auditors in an organized way
- Carefully reviewing the recommendations from our auditors
- Carrying out any needed changes or improvements
- Properly responding to any questions or business requests by our auditors

Additional resources:

- **Risk Management Policy**
- **Energy Trading Compliance Policy**

We follow the regulations and guidelines set by:

- Federal Energy Regulatory Commission (FERC)
- Commodities Futures Trading Commission (CFTC)
- Designated Contract Markets (DCMs) such as Intercontinental Exchange (ICE), NYMEX, Nodal, CME
- Department of Energy (DOE)
- North American Electric Reliability Corporation (NERC)
- Relevant independent system operators (ISOs)

Meeting our regulatory expectations requires us to have accurate and complete records for proper reporting.

TOC

Accurate Recordkeeping and Reporting

Why it matters

With our records complete and up to date, we can make informed and effective business decisions. Accurate records lead to reliable reports for NRG, our regulators, and our shareholders.

How we act

Keep accurate and complete records by:

- Recording all business transactions in the right amount of detail, for the right period, and in a timely way
- Accurately completing and filing incident reports, expense reimbursement claims, and time sheets
- Never setting up hidden or “off-the-books” cash accounts or other assets or liabilities
- Promptly addressing concerns when they occur
- Following the NRG Records Retention Schedule
- Notifying management of errors to be corrected and those affected by the error as soon as practical

Additional resources:

- **Records Management Policy**
- **Records Retention Schedule**
- **Anti-Bribery and Corruption Policy**
- **Gift and Receipt of Business Entertainment Policy**

Did you know?

Our information is reported on a monthly, quarterly, semiannual, and annual basis. These reports are provided to stakeholders inside and outside the Company.

With accurate records, we can properly support both our operations and communications.

TOC

Public Communications



Why it matters

We are committed to honest and transparent public communications with investors and stakeholders. We aim for those outside of NRG to feel confident that they have a clear and informed view of our Company.

How we act

Communicate with the public by:

- Using the approved spokespeople for our public statements online or in person
- Providing clear updates to the public with verified information
- Making sure that all our investor communications are easily accessible
- Following all of the rules that cover communications with our investors
- Avoiding the use of non-public information in our official statements
- Working with Communications if you are asked to speak publicly

Additional resources:

- **Communications Policy**
- **Public Speaking Policy**



TOC

Communities



TOC

We are neighbors, partners, and stewards in the places where we live and work. NRG believes in doing what's right whether we are giving back, supporting important causes, standing up for human rights, or protecting the environment. In everything we do, we are committed to making a positive impact in the communities we serve.

TOC

Charitable Contributions and Volunteering in the Community

Why it matters

At NRG, we believe in doing our part to uplift the communities where we live and work. We encourage our people to volunteer and support charitable causes that align with our values and mission.

How we act

Get involved by:

- Taking part in NRG's volunteer events that support our communities
- Logging our volunteer activities that occur during and outside of work hours
- Reporting our donations to approved charities through NRG's employee matching program
- Conducting ourselves in a professional way and with good judgment
- Never using charitable contributions for personal gain or to have an effect on our decisions at work

Additional resources:

- **NRG's Community Impact page**

Curious how to get involved?

YourCause offers several opportunities to volunteer! It's a fantastic resource for helping you find a cause or project in your area that matches your interests and skills. If you don't see an opportunity that interests you, feel free to reach out to **positivenrg@nrg**.com for help setting up a new opportunity or use the TeamNRG and NRG Dollars for Hours programs.

In addition to supporting our charitable efforts, we also encourage our employees to get involved in causes that speak to them on a political level.

TOC

Political Contributions

Why it matters

NRG believes that engaged citizens contribute to a healthy society. As a company, we support a fair political process and our employees' right to take part in an ethical and transparent way.

How we act

Advocate for causes we care about by:

- Supporting the causes that matter to us by using our own time, money, and resources
- Getting approval before making any statement that could be perceived as NRG
- Never promoting a candidate or political cause to our employees, customers, or third parties
- Reaching out to Compliance if we decide to run for office or make a personal contribution
- Following any state pay-to-play laws and regulations
- Working with Government Affairs on any potential political contribution using corporate funds (only Government Affairs may make such contributions)

Additional resources:

NRG Political Contribution Policy

Did you know?

NRG's Political Action Committee (PAC) uses funds donated by employees to help NRG and our ability to grow. Consider joining if you are interested.

Alongside responsible political engagement, NRG commits to upholding human rights in every part of our business.

TOC

Human Rights

Why it matters

NRG upholds human rights everywhere we work: in our workplaces, in our supply chain, and in our interactions with third parties. We expect all of our suppliers and partners to promote safety and integrity.

How we act

Support and advocate for human rights by:

- Requiring safe, clean, and healthy working conditions
- Offering compensation and benefits that are in line with industry and legal standards
- Sourcing in an ethical way
- Respecting our team members' right of free association and collective bargaining
- Creating economic growth in the communities that we affect
- Following the United Nations' Guiding Principles on Business and Human Rights, a framework for responsible business conduct and human rights

Additional resources:

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

We want to protect human rights and the environment around us to further support the communities we serve.

TOC

Protecting the Environment



Why it matters

NRG is building a brighter and cleaner future. Together, we can innovate sustainable solutions for tomorrow.

How we act

Uplift our environment by:

- Innovating ways to support the efficient use of energy
- Always working to improve our clean energy options
- Leading discussions on our approach to environmental and sustainable topics
- Caring about our impact on the environment when we make decisions
- Following the applicable laws for air emissions, water quality, hazardous waste, and spill prevention
- Contacting Safety, Plant Management, Facilities, or Environmental when spills occur

Additional resources:

- **Environmental Manual**
- **NRG Annual Report**



TOC

Disclaimers



TOC

Code Waivers

In rare circumstances, we may provide a waiver of this Code. NRG's Chief Compliance Officer may grant waivers to NRG employees, but not 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.

Code Amendments and Updates

The Code is built upon multiple key risk topics. Each topic begins with a brief explanation of its importance, followed by guidelines on proper behavior and other resources such as Company policies. Topics can also include scenarios that highlight issues requiring care and subsections with relevant information. Immaterial updates to Company policies, scenarios, and contact information may be conducted to keep our Code up to date.

Any material amendment of any provision of this Code must be approved by NRG's Board of Directors.



Latest Update: August 2025


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TOC

Light the Way

Code of Conduct