

Nextia Energy, LLC - Code of Ethics Policy

Policy Purpose and Scope

Our professional code of ethics policy aims to give our employees, consultants or anyone Nextia Energy has a business with, clear guidelines on our business ethics and stance on various controversial matters.

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, consultants, interns, volunteers, but also business entities, such as vendors and clients. The full compliance to this policy is mandatory.

We base our business code of ethics on common principles of ethics:

- **Integrity and honesty.** Tell the truth and avoid any wrongdoing to the best of your ability.
- **Justice.** Make sure you're objective and fair and don't disadvantage others.
- **Lawfulness.** Know and follow the law – always.
- **Competence and accountability.** Work hard and be responsible for your work.
- **Respect for others.** Treat people as you want to be treated.

Integrity and honesty

We all work together to achieve specific outcomes. Your behavior should contribute to our goals, whether financial or organizational.

Be honest and transparent when you act in ways that impact other people. We don't tolerate malicious, deceitful or petty conduct. Lies and cheating are huge red flags and, if you're discovered, you may face discipline sanctions or immediate termination depending on the damage you did.

Stealing from the company or other people is illegal. If you're caught, you will face repercussions depending on the severity of your actions.

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it.

If it turns out you have voluntarily created a conflict of interest for yourself, you will be terminated. If the conflict of interest was involuntary, we will take actions to rectify the situation. If you repeat the offense, you may be terminated. There are multiple cases where a conflict of interest might not be as clear so we encourage everyone that has questions or doubt about a specific situation and not sure if it may constitute a conflict of interest, to address the issue with a supervisor or project leader.

Justice

Don't act in a way that exploits others, their hard work or their mistakes. Give everyone equal opportunity and speak up when someone else doesn't.

Be objective when making decisions that can impact other people, including when you're deciding to hire, promote or fire someone. Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case.

Also, don't discriminate against people with protected characteristics, as this is forbidden. If you suspect you may have an unconscious bias that influences your decisions, ask for help from your supervisor or project leader.

When exercising authority, be fair. Don't show favoritism toward specific employees or collaborators.

Be just toward customers or vendors, too. If you think our company was in the wrong in a specific instance, don't try to cover it up or accuse the other side. Discuss with your supervisor or project leader to find solutions that can benefit both sides.

Lawfulness

You are obliged to follow all laws which apply to our organization. Depending on your role and profession, there might be various laws you need to observe.

You must not expose, disclose or endanger information of customers, employees, stakeholders or our business.

Following laws regarding fraud, bribery, corruption and any kind of assault is a given. FCPA and anti-corruption / anti bribery local laws must be observed always. In Nextia Energy we have a specific policy for anti-bribery which include treatment of gifts and

If you're not sure what the law is in a specific instance, don't hesitate to ask your supervisor or project leader.

Competence and accountability

We all need to put a healthy amount of effort in our work. Not just because we're all responsible for the organization's success, but also because slacking off affects our colleagues. Incomplete or slow working might hinder other people's work or cause them to shoulder the burden themselves. This comes in direct conflict with our respect and integrity principles.

We also expect you to take up opportunities for learning and development, either on-the-job or via educational material or training. If you are unsure how you can achieve this, have an open discussion with your supervisor or project leader.

Also, take responsibility for your actions. We all make mistakes or need to make tough decisions and it's important we own up to them. Acknowledging a mistake or omission on time avoids having more serious implications.

Respect for others

It's mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions and privacy. You're also not allowed to harass or victimize others.

As a general rule, try to put yourself in someone else's place. How would you feel if someone behaved a specific way to you? If the answer is "I wouldn't like it much" or "I would never let them behave like that to me", then we don't tolerate this behavior no matter the person it comes from.

If someone, be it customer, colleague or stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to your supervisor or project leader.