



NRG ENERGY, INC.

Human Rights & Social Responsibility Standards for Manufacturers

Introduction

NRG Energy, Inc. ("NRG") is at the forefront of changing how people think about and use energy. As a Fortune 200 Company, NRG supports clean energy resources and technologies critical to our transition to a sustainable, low-carbon society.

Our core values of safety, teamwork, respect, integrity, value creation, and exemplary leadership provide a framework for all corporate strategy and decision-making. They are the standards to which we strive to conduct our daily business, work with one another, and interact with our communities. We similarly expect the same commitments to be shared by all Manufacturers¹ who manufacture, assemble, and export components and assembled Products² for NRG, its subsidiaries and businesses.

NRG requires all Manufacturers, including Subcontractors³, to adhere to the Human Rights & Social Responsibility Standards for Manufacturers ("Standards"), which, at minimum, require compliance with applicable laws and regulations, industry best practices, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work⁴. Manufacturers who employ Subcontractors shall verify that these Standards are upheld by their Subcontractors. These Standards are referenced and made part of any Manufacturing Agreement put forth by NRG.

Application

The Standards encompass all Employees involved in the operation of a Manufacturer's facility. The definition of "Employee" shall include, but is not limited to, office and production personnel, contracted and imported labor, homeworkers, and part-time, temporary and/or seasonal labor.

¹ "Manufacturer" means either supplier or vendor previously directly or indirectly approved by NRG in writing and engaged to manufacture Products to NRG's specifications.

² "Product(s)" means products and components manufactured and assembled by Manufacturer and/or Manufacturer's Subcontractors on behalf of NRG under the Manufacturing Agreement.

³ "Subcontractor" means any person or entity retained by a Manufacturer to participate in the manufacture, assembly or packaging of Products, including but not limited to Manufacturer's sub-suppliers and vendors, regardless of whether such person or entity was nominated or directly approved by NRG.

⁴ NRG incorporates the following standards based on ILO Conventions into its Standards: No. 29 Forced Labour (1930), No. 87 Freedom of Association and Protection of the Right to Organize (1948), No. 98 Right to Organize and Collective Bargaining (1949), No. 100 Equal Remuneration (1951), No. 105 Abolition of Forced Labour (1957), No. 111 Discrimination (Employment and

Occupation) (1958), No. 138 Minimum Age Convention (1973), No.182 Elimination of the Worst Forms of Child Labour (1999)

Compliance with Laws and Regulations

Manufacturers shall abide by the applicable laws and regulations of the country in which they are doing business, including, but not limited to, laws related to labor practices, health and safety, environmental responsibility, and anti-corruption.

The Standards also set requirements based on industry best practices and international conventions. In such instances, Manufacturers shall abide by the stricter standard insofar as it does not violate applicable laws and regulations. Should a Manufacturer deem compliance with the Standards to be in conflict with any applicable law or regulation of the country in which the Manufacturer does business, then the Manufacturer shall immediately disclose such information to NRG through the Manufacturer's normal and primary contact person at NRG.

Annually, Manufacturers shall certify in a form substantially similar to Exhibit C of the Manufacturer's Agreement, its compliance with applicable laws, including, but not limited to applicable anti-corruption laws.

Labor Standards

Labor Postings

Where and as required by law, Manufacturers shall maintain and post labor-related notices. As applicable and to facilitate comprehension by Employees, notices shall be translated.

Privacy

Where and as required by law, Manufacturers shall ensure Employees' privacy is maintained. At minimum, Employee records shall be kept private.

Hiring and Termination

Each Employee shall receive a copy of a written employment agreement outlining the terms of employment in an official language and in the language understood by the applicable Employee. Each Employee shall fully understand his or her employment terms prior to commencing work and shall not be required to sign an incomplete agreement.

Employees shall be in a legal employment relationship.

Prior to hire, Manufacturers shall verify age documentation, and where legally permitted, maintain a copy of such legal documentation.

Manufacturers shall execute terminations in compliance with the law and shall maintain termination records for a period of not less than five years following the termination.

Wages and Benefits

Manufacturers shall maintain accurate payroll records and, if applicable, production records. Employees shall receive at least the legal wage rate for hours worked, including overtime, and be paid in accordance with applicable law; but, at minimum, Employees' wages shall be

paid directly into an Employee-controlled account, and Employees shall receive wages at least once per month, on time, with a pay slip. Pay slips shall be clear enough to be understood by Employees.

Manufacturers shall only permit deductions regulated or approved by applicable laws or regulations.

Manufacturers shall furnish all benefits required by applicable laws or regulations.

Working Hours

Manufacturers shall maintain accurate time records and prohibit off-clock work or work taken home, unless official home-work practices are in place. Working hours, both regular and overtime, shall comply with legal requirements. Should the law be less stringent, Manufacturers are encouraged to adhere to working hours of maximum 60 hours (including overtime) per seven-workday period.

Employees shall be informed about overtime obligations and be permitted to reject an overtime request without punishment or retaliation.

Where, and as required by law, Manufacturers shall provide rest breaks and daily rest. Employees shall receive at least one day off in a seven-workday period.

Forced, Bonded, Indentured, Slave, Trafficked, and Prison Labor

Manufacturers shall not engage in any form of forced, bonded, indentured, or slave labor and human trafficking. Manufacturers shall ensure that the Employee is not subject to any deception during recruitment and hiring. Employees shall not pay any fees, travel expenses, administrative costs or other payments for the purpose of recruitment or employment or as a condition of employment.

Employees shall not be subject to debt bondage⁵ as a result of recruitment or employment, in debt due to recruitment or employment and shall not be subject to any financial deposits. Employees shall be in possession or have direct control of their personal identity documents, must be guaranteed freedom of movement, and Employees shall not be restricted from terminating employment (other than restrictions pertaining to legal notice periods).

Manufacturers shall not illegally implement mandatory overtime or mandatory overtime beyond legal overtime limits. Employees may voluntarily agree to overtime and will document such voluntary consent to any legal mandatory overtime in writing prior to employment or prior to an overtime shift. Any applicable production quotas shall not result in illegal mandatory overtime or violations against the Standards for working hours.

Employees shall not be subject to any threats of termination or repatriation (applicable with employment of foreign migrant workers).

Manufacturers shall not utilize prison laborers, neither within nor outside a prison facility.

⁵ As defined by the UN's 1956 Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery.

Child Labor, Young Workers, Apprentices, and Trainees

Manufacturers shall not employ individuals under the age of 15 or under the legal working age, whichever stricter.

Working conditions (including labor and health and safety practices) of Employees under the age of 18 shall be in compliance with the law and not jeopardize the health, safety or morals of these Employees.

Employment of trainees, apprentices and individuals under the age of 18 shall be conducted in compliance with the law, including medical testing, applicable documentation maintenance, such as licenses and permits, and terms of employment, such as hours and pay.

Manufacturers shall implement a system to remediate⁶ situations where an Employee is discovered to have been hired below the age of 15 or the legal minimum age, if higher.

Abuse, Coercion, Harassment, and Disciplinary Action

All Employees shall be treated with dignity and respect and not be subject to verbal, physical, or mental abuse, coercion, pressure or threats, corporal punishment, or any form of harassment during employment or recruitment.

Manufacturers shall implement a written disciplinary procedure and shall not permit illegal or excessive disciplinary action and/or monetary fines. Manufacturers shall communicate the disciplinary procedure to all Employees upon hire.

Manufacturers shall not permit abusive security practices, including opposite-sex frisking or removal of clothing.

Discrimination

Employees shall not be subject to any illegal recruitment or hiring tests including, but not limited to, any pregnancy or HIV testing, and birth control for the purpose of employment.

Employees shall not be subject to discrimination in all aspects of employment.

Manufacturers shall accommodate the beliefs of Employees as far as practicable and Manufacturers are encouraged to maintain written procedures to prevent discrimination in the work place

Freedom of Association and Collective Bargaining

Manufacturers shall seek to respect the legal rights of Employees to associate, organize, and bargain collectively in a lawful manner without interference, penalty, or retaliation. Where local legislation curtails these rights, Manufacturers shall encourage alternative means to facilitate worker representation.

⁶ A system to remediate non-acceptable child labor as per the Standards shall mean the development or participation in and contribution to policies and programs which provide for the transition of any child in a non-acceptable child labor situation to a situation that places the best interests of the child first and in which the child can remain until acceptable to work under the Standards.

Health and Safety⁷

Licenses, Permits and Certifications

Where and as required by law, Manufacturers shall maintain valid health and safety permits, licenses and/or certifications.

Health and Safety Postings

Where and as required by law, Manufacturers shall maintain and post health and safety-related notices. As applicable and to facilitate comprehension by Employees, notices shall be translated.

Risk Assessment and Management

Manufacturers are encouraged to complete an annual risk assessment and implement measures to manage identified health and safety risks.

Personnel

Manufacturers shall assign a health and safety manager or responsible personnel to ensure Employee and operational safety, and maintain a health and safety committee that monitors and documents health and safety concerns and remediation efforts.

Emergency Precautions

Where and as required by law, Manufacturers shall maintain fire extinguishers and, unless the law states otherwise, maintain and mount fire extinguishers in areas of flammable or combustible materials storage and along emergency exit pathways. Extinguishers shall remain accessible, be indicated, and have operating instructions and monthly inspection tags.

Where and as required by law, Manufacturers shall maintain emergency alarms. At minimum, Manufacturers shall maintain manual or automatic emergency alarms in production and distribution areas. Alarms shall be indicated, accessible, and audible or visible in high-noise areas.

Secondary emergency exits shall be present on each floor and located at opposite ends.

Emergency exits, including doors and windows, shall be accessible, indicated, unlocked, provided with luminescent signage in a language understood by the majority of Employees, single-release operable, side-hinged, self-closing, and open in the direction of travel. Emergency exits must have a landing on the exit side.

Emergency exit pathways shall be accessible, indicated with directional signs and path markings, lead to a public way or assembly point and shall be continuously lit. Emergency lighting shall be provided along all emergency exit paths.

⁷ Where applicable, NRG expects Manufacturers to comply with the health and safety standards identified in ILO Conventions No. 155 Occupational Safety and Health and No. 174 Prevention of Major Industrial Accidents

Where and as required by law, emergency evacuation plans shall be posted. At minimum, Manufacturers shall post emergency evacuation plans in high-concentration areas and along emergency exit pathways. Emergency evacuation plans shall be accessible, shall reflect the facility's plot plan accurately in a language understood by the majority of Employees, and shall contain the accurate location of the assembly point as well as a "You Are Here" mark.

The emergency assembly point shall be accessible by the emergency exit pathway, unobstructed, and separated from hazardous, combustible or flammable materials or objects.

Where and as required by law, Manufacturers shall implement evacuation drills. At minimum, Manufacturers shall implement evacuation drills every 12 months for all shifts and floors of the facility and building. Manufacturers shall maintain documentation of the two most-recent evacuation drills.

First Aid

Manufacturers shall maintain fully equipped first aid kits accessible to Employees. The locations of first aid supplies shall be clearly indicated. As required by safety data sheets applicable to chemicals maintained at a Manufacturer's facility, Manufacturers shall provide functional and appropriately located eye wash stations and/or chemical shower facilities.

Where and as required by law, there shall be trained first aid Employees. At minimum, there shall be one Employee responsible for first aid on every shift.

Where and as required by law, Manufacturers shall maintain medical staff and/or a medical clinic and records and segregate hazardous medical waste.

Where and as required by law, medical tests shall be administered to all applicable Employees.

Accident

Manufacturers shall maintain accident records and investigate each Employee and facility accident and engage in root-cause analysis and corrective and preventative action.

Personal Protective Equipment

Manufacturers shall establish a policy governing personal protective equipment identification, use, maintenance and training. Manufacturers shall communicate and train all Employees on the facility's personal protective equipment policy. Manufacturers shall provide personal protective equipment and ensure the equipment is used and maintained.

Chemicals and Hazardous Materials

Manufacturers shall establish a policy governing chemicals and hazardous materials identification, use, maintenance and training. Manufacturers shall communicate and train all Employees on the facility's chemicals and hazardous materials policy. Manufacturers shall ensure safe handling, storage and disposal of chemicals and hazardous materials and

ensure such materials are clearly labeled. Manufacturers shall maintain an inventory of chemicals and hazardous materials as well as all applicable safety data sheets.

Equipment Safety

Manufacturers shall establish a policy governing equipment safety identification and maintenance. Manufacturers shall communicate and train all Employees on the facility's equipment safety policy. Where and as required by law, Manufacturers shall provide and maintain equipment safety mechanisms, as well as maintain special equipment, such as forklifts, boilers, generators, elevators (lifts), compressors, and industrial refrigerators.

Electrical Safety

Manufacturers shall maintain accessible electrical panels, wiring and outlets and prevent damaged or exposed wiring, possible trip hazards and overloading through use of adapters, extension cords and/or surge protectors.

Noise, Lighting and Ventilation

Where and as required by law, Manufacturers shall monitor noise levels. At minimum and where applicable, Manufacturers shall provide personal protective equipment to manage Employee exposure to noise.

Manufacturers shall maintain a work place that is sufficiently lit, ventilated and temperature controlled.

Potable Water and Sanitation

Employees shall have unlimited and free access to potable water and toilet facilities. Toilets shall be sufficient in number, sanitary, well-lit and ventilated, separated by gender, and contain privacy stalls, running water and toilet supplies.

Manufacturers shall maintain work spaces free from accumulated dust, lint, waste and scraps and shall document general housekeeping schedules.

Food Preparation and Canteen

Where and as required by law, Manufacturers shall maintain any applicable permits, licenses and/or certifications required for food preparation and canteen services. At minimum, Manufacturers shall provide sanitary food preparation and canteen areas and these areas shall be equipped with an emergency alarm system, secondary emergency exit, a fire extinguisher and a first aid kit.

Child Care

Where and as required by law, Manufacturers shall provide a child-care facility. At minimum, Manufacturers shall ensure any child-care facility is sanitary, separate from the production area, on the ground floor, equipped with an emergency alarm system, secondary emergency exit, a fire extinguisher and a first aid kit.

Individuals under the age of 18 who are not working at the facility should not have access to production areas.

Dormitory

Where and as required by law, Manufacturers shall maintain valid dormitory health and safety permits, licenses and/or certifications.

Dormitories for Employees shall be separate from the production and distribution areas of the facility. Employees shall have access to sanitary sleeping and eating quarters, potable water, hot water, and toilets and sleeping quarters segregated by gender.

Emergency precautions and electrical safety Standards at the facility shall equally apply at the dormitory.

Employees must not be subject to curfews or abuse by security personnel and shall be free to choose between facility-provided housing and other accommodation alternatives.

Grievance Procedure

Manufacturers shall implement a grievance procedure by which Employees can confidentially raise issues of concern to management without fear of reprisal or negative repercussions. The grievance procedure shall record and track grievances and Employees shall be made aware of the progress or resolution of any raised grievances.

Environmental Protection

Licenses, Permits and Certifications

Where and as required by law, Manufacturers shall maintain valid environmental permits, licenses and/or certifications.

Environmental Postings

Where and as required by law, Manufacturers shall maintain and post environmental-related notices. As applicable and to facilitate comprehension by Employees, notices shall be translated.

Risk Assessment and Management

Waste shall be handled in a controlled manner, and Manufacturers are encouraged to maintain a waste inventory.

Manufacturers shall separate hazardous waste from regular waste and prevent the direct discharge of hazardous waste into the environment.

Manufacturers are encouraged to maintain an inventory of hazardous waste, air emissions outputs and volumes, and waste water outputs and volumes.

With regards to hazardous waste, air emissions, waste water and noise pollution, respectively, Manufacturers are encouraged to establish a policy for identification, inventory,

control and training shall communicate and train all Employees on the facility's policies and maintain control devices.

Manufacturers are encouraged to complete a risk assessment to identify environmental risks to Employees and the community and implement measures to manage identified risks.

Manufacturers are encouraged to follow the principles of reduce, reuse and recycle, monitor and reduce resource consumption, and engage in recycling as feasible.

Material Compliance

Manufacturers shall ensure that all Products are manufactured and packaged in compliance with NRG's quality guidelines as outlined in the Manufacturing Agreement.

Conflict Minerals

Manufacturers shall maintain full compliance with applicable Conflict Minerals Laws⁸. No Products delivered to NRG shall contain any Conflict Minerals⁹ unless specifically approved in writing by an authorized officer of NRG, in which case the Manufacturer shall ensure that any such Conflict Mineral included in any Product will not originate from the Democratic Republic of Congo or an adjoining country.

Business Operations, Home-work and Subcontracting

Where and as required by law, Manufacturers shall maintain a valid business license for its operation and any applicable home-work engagements. All home-work shall be documented and monitored by the facility.

Manufacturers shall inform NRG of all home-work and subcontracting activities. A Manufacturer may retain Subcontractors and homeworkers to assist with the manufacture of Products provided that 1) all Subcontractors and home-work activity are approved in advance in writing by NRG and 2) that all Subcontractors have signed an appropriate confidentiality and non-competition agreement in a form acceptable to NRG.

Bribery and Facilitation Payments

Manufacturers shall not engage in bribery or falsification of records and undue influencing of workers to tamper with the execution and verification of these Standards.

Manufacturers shall establish a policy prohibiting bribery and facilitation payments. Manufacturers shall ensure that it and its directors, partners, principals, officers, and Employees are familiar with the requirements of NRG's Foreign Corrupt Practices Act Policy, all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA), and that none of them has violated, or shall violate any anti-corruption laws.

⁸ In the United States, applicable laws include section 1502 of the Dodd-Frank Wall Street Reform, the Consumer Protection Act of 2010, forthcoming amendments to such laws, and any related regulations, rules, decisions or order adopted by the Securities and Exchange Commission or successor governmental agency responsible for adopting regulations relating thereto.

⁹ "Conflict Mineral" means a material designated as a conflict mineral pursuant to applicable laws (currently understood to be gold, tungsten, tin and tantalum).

Where and as required by law, Manufacturers shall implement whistleblower protections. At minimum, Employees shall feel free to refuse to participate in bribery or facilitation payments supported by the facility and shall be aware that they will not suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the facility losing business.

Management Systems

To manage compliance with these Standards, Manufacturers are encouraged to establish policies governing labor, grievances, health and safety, environmental responsibility and ethics and business integrity. These policies shall be endorsed by executive management, kept up to date as requirements and legislation change, communicated to all Employees, and reviewed on an annual basis. Manufacturers shall appoint responsibility to personnel for implementing the policies. Furthermore, Manufacturers are encouraged to set performance objectives related to labor, grievances, health and safety, environmental responsibility and ethics and business integrity to drive continuous improvement.

Standards Compliance Monitoring

Manufacturers and their Subcontractors shall grant full access to NRG or a designated third party to all operations, including related documentation and facility-provided housing, and grant permission to conduct confidential Employee interviews. Supplier audits will be conducted on a regular basis, depending on NRG's total supplier portfolio and other administrative considerations.¹⁰ All new suppliers should be audited as soon as is practical upon engagement with NRG. Upon a "favorable" or "acceptable" audit (a subjective judgement based on issues found), a facility is next audited in approximately 3 years. This schedule is subject to change if a significant change in conditions at the facility is noted in the interim; or if management changes; or if credible reports of issues at the facility are received that would warrant a sooner audit.

Manufacturers and their Subcontractors shall maintain on site all documentation that may be needed to verify compliance with the Standards. Accurate books and records associated with the transactions contemplated by the Manufacturing Agreement, including, without limitation, payroll, timesheets, training records, work specifications, invoices, purchase orders, receipts, and documentation of expenses shall be maintained for a period of not less than five years following completion of the transactions or matter to which they relate.

Depending on a facility's operational environment, confidential employee interviews may also be conducted with Employees indirectly involved in facility operations, such as canteen, security and cleaning personnel. In addition, interviews with management shall foster understanding of Manufacturers' management systems.

Should non-compliance with the Standards be determined, Manufacturers shall engage in corrective action. Long-term corrective action involves identification of root causes and implementation of management systems to ensure non-compliances are prevented from occurring in the future. NRG reserves the right to suspend any agreements with the

¹⁰ As of Q2 2016, facilities are being audited at the rate of one per quarter.

Manufacturer until corrective actions are implemented, or to terminate its relationship with the Manufacturer.

Reporting of Violations

Manufacturers agree to immediately report to NRG's reporting hotline any information concerning a suspected violation by a Manufacturer or its Employees, NRG or any of its Employees, or any other person in connection with the Standards.

The reporting hotline can be accessed 24 hours per day, seven days a week by calling +1.888.263.0463 or online at www.nrg.alertline.com. The Alertline call-in number for China is as follows:

International Toll-Free Service (ITFS)

From an outside line dial the ITFS number for your location:

10-800-120-1239	China (Southern)
10-800-712-1239	China (Northern)