



NRG Human Rights & Social Responsibility Standards for Manufacturers

Introduction

NRG Energy, Inc. (“NRG”), a Fortune 500 company, is at the intersection of energy and home services, driven by the idea of a smarter, cleaner, digitally-enhanced energy ecosystem—and the possibilities that it brings to the world and to the 7.3 million customers we serve. Our five Power Values guide our actions as we transform the future of energy and move ahead with sustainable growth. They are Safety and Well-Being, Customer Focus, Collaboration, Accountability and Diversity, Equity and Inclusion. 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 Subcontractors,³ to adhere to these Human Rights & Social Responsibility Standards for Manufacturers (the “Standards”) which, at minimum, require compliance with the higher (stricter) standard of either applicable laws and regulations, industry best practices, or well-accepted international standards, such as the [United Nations Guiding Principles on Business and Human Rights](#), and the International Labour Organization’s [Combating Forced Labour: A Handbook for Employers and Business](#). Manufacturers who employ Subcontractors shall require and verify that these Standards are upheld by their Subcontractors. The Standards are referenced and made part of any NRG Manufacturing Agreement and must be included in any subcontract or purchase agreement between Manufacturer and any Subcontractor (including vendors of component parts).

Application

The Standards encompass all Employees involved in the operation of a Manufacturer’s or Subcontractor’s facility and all Employees involved in the manufacture of any product sold or provided to NRG, including any subassemblies or component parts. 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. All non-US-based manufacturers and direct vendors must be pre-approved by NRG.

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, human slavery, health and safety, environmental responsibility, and anti-corruption. The Standards also set requirements based on industry best practices and well-accepted 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

¹ “Manufacturer” means either supplier or vendor 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 and to subcontractors responsible for managing labor. This includes the manufacturer or subcontractor of any parts or input goods that are incorporated into any goods manufactured for or sold to NRG for resale. The Standards apply to all labor used in the supply chain for any goods manufactured for or sold to NRG for resale.

such information to NRG or to NRG's Compliance department at ethics@nrg.com. Manufacturers shall cooperate with NRG to determine that its compliance with the Standards and subject itself to audits at the sole discretion of NRG with reasonable notice to the Manufacturers.

Labor Standards

Labor Postings

Where and as required by law, Manufacturers shall maintain and post labor-related notices, including those prohibiting the use of forced or child labor and encouraging reporting of such issues. 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. Employee records shall be kept private in conformance with applicable law.

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 consistent applicable law 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 time consistent with applicable law or not less than five years following the termination, whichever is longer.

Wages and Benefits

Manufacturers shall maintain accurate payroll records and, if applicable under NRG contract or law, 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, detailing the hours worked in the applicable period, the wages paid, any required or relevant deductions for taxes and/or benefits. 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 that accurately monitor and compensate hours worked. Working hours, both regular and overtime, shall comply with applicable law. Manufacturers shall not implement mandatory overtime and Employees shall be permitted to reject an overtime request without punishment or retaliation. Manufacturers shall provide rest breaks and daily rest. Employees shall receive at least one day off (of at least 24 consecutive hours) 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. Forced Labor means all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily. 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 bondage 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.

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, or government labor programs including those purportedly related to "poverty alleviation," "pairing assistance," or "labor transfer" that may include discriminatory social control, pervasive surveillance, and large-scale internment.

Child Labor, Young Workers, Apprentices, and Trainee

Manufacturers and Subcontractors shall not employ individuals under the age of 15 or under the legal working age, whichever is stricter. Manufacturers and Subcontractors shall not employ individuals under the age of 18 for hazardous work or under the legal working age for hazardous work, whichever is 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 remediate⁴ situations where an Employee is discovered to have been hired below the age of 15 or the legal minimum age, if higher. If discovered, Manufacturers shall immediately report this to NRG.

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 any aspects of employment. Manufacturers shall accommodate the beliefs of Employees as far as practicable and are encouraged to maintain written procedures to prevent discrimination in the workplace.

Freedom of Association and Collective Bargaining

Subject to applicable law, 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.

⁴ 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 Safety

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, responsible personnel, or a health and safety committee to ensure Employee and operational safety to monitor and document 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 preferably 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.

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 and shall maintain documentation of the most recent such 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 may be 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 or practice governing equipment safety identification and maintenance. Manufacturers shall communicate and train all Employees on such policy or practice. 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 workplace 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 workspaces 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. If such a facility is required, then at minimum, Manufacturers shall ensure it 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. Such 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 have a grievance procedure by which Employees can confidentially raise issues of concern to management without fear of reprisal or negative repercussions.

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. If not required by law, Manufacturers are encouraged to separate hazardous waste from regular waste and shall 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 wastewater outputs and volumes. With regards to hazardous waste, air emissions, wastewater and noise pollution, respectively, Manufacturers are encouraged to establish a policy for identification, inventory, control and training, and 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.

Conflict Minerals

Manufacturers shall maintain full compliance with applicable Conflict Minerals Laws and shall

cooperate with NRG with regard to NRG's annual Conflict Minerals⁵ filing with the U.S. Securities & Exchange Commission.⁶

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 have a policy or practice 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 Anti-Bribery & Corruption Policy, all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, and that none of them has violated, or shall violate any anti-corruption laws. 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.

Management Systems

Manufacturers must have and enforce policies and practices to ensure compliance with these Standards and shall be kept up to date as requirements and legislation change, communicated to all Employees, and reviewed on an annual basis. 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, for the purpose of an audit, 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 periodic basis with reasonable notice. All new subcontractors and 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, production 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

⁵ "Conflict Mineral" means a material designated as a conflict mineral pursuant to applicable laws (currently understood to be gold, tungsten, tin and tantalum).

⁶ 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.

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

Reporting of Violations

Manufacturers agree to immediately report to NRG any information concerning a suspected violation by a Manufacturer, Subcontractor or its Employees, NRG or any of its Employees, or any other person in connection with the Standards, or to NRG Compliance at ethics@nrg.com. The Manufacturer will work to remedy any violations. Where violations occur NRG reserves all of its rights with regard to the commercial relationship with that Manufacturer. The Manufacturer may also report concerns or violations through NRG's whistleblower hotline. Reports can be sent in anonymously and the reporting hotline can be accessed 24 hours per day, 7 days a week by reporting online at nrg.alertline.com.