

GE VERNOVA INTEGRITY GUIDE FOR SUPPLIERS, CONTRACTORS & CONSULTANTS:



The GE Vernova Supplier Code of Conduct

This guide also applies to Consortium Partners

A Message from GE Vernova

GE Vernova is committed to unyielding integrity and high standards of business conduct in everything we do, including in our dealings with suppliers, contractors, consortium partners and consultants (collectively “Suppliers”). GE Vernova bases its Supplier relationships on lawful, efficient and fair practices. Suppliers must adhere to applicable legal and regulatory requirements, and the requirements set out in this Supplier Integrity Guide for Suppliers, Contractors & Consultants: The GE Vernova Supplier Code of Conduct (the “Guide”) in connection with their activities for GE Vernova.

Suppliers shall train their employees, workers and representatives on the requirements in this Guide, and Suppliers shall ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with such requirements and other contractual obligations to GE Vernova. Suppliers are expected to cooperate in good faith with GE Vernova to identify gaps and challenges in complying with this Guide, including disclosing relevant information to GE Vernova upon request and, where necessary, implementing improvements to ensure full compliance.

Please contact the GE Vernova manager you work with or any GE Vernova Compliance Resource if you have any questions about this Guide or its requirements.

Responsibilities of GE Vernova Suppliers

Labor & Human Rights

Suppliers are expected to share GE Vernova’s commitment to respect all internationally recognized human rights, including those listed in the International Bill of Human Rights and the International Labor Organization’s Declaration on the Fundamental Principles and Rights at Work, and to comply with the United Nations Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

Respectful Workplace: GE Vernova is committed to providing a safe, fair and respectful work environment. Ensuring a respectful workplace requires Suppliers to, at a minimum:

- **Fair Working Conditions:** (i) Provide all workers a safe and healthy work environment, *see infra* **Safe and Healthy Workplace**; (ii) Observe all applicable laws and regulations governing wages and hours, adequate rest, recruitment and employment contracts; (iii) Ensure that a workweek is not be more than 60 hours, including overtime, except in emergency or unusual situations; (iv) Allow workers to have at least one day off every seven days; (iv) For each pay period, provide workers with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.
- **Freedom of Association:** Allow workers to choose freely whether to join or form a labor union, to bargain collectively and to engage in peaceful assembly without fear of reprisal, intimidation, violence or harassment.

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- **Equality and Nondiscrimination:** (i) Provide equal employment and advancement opportunities to all; (ii) Commit to a workplace free of harassment and unlawful discrimination.¹
- **Dignity at Work:** (i) Treat all workers fairly and with respect; (ii) Prohibit harsh or inhumane treatment, including but not limited to gender-based violence, sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion, public shaming or verbal abuse of workers and threats of any such treatment; (iii) Maintain and clearly communicate to workers disciplinary policies and procedures in support of these requirements.

Forced Labor: (i) Prohibit the use of forced labor, including prison or indentured labor and ensure workers are not subject to any form of physical, sexual or psychological compulsion, exploitation, violence, coercion or inhumane treatment or other forms of human trafficking; (ii) Ensure that a worker's identity or immigration documents are not withheld or destroyed; (iii) Allow workers to terminate their employment, for any reason, with reasonable notice; (iv) Ensure that recruitment fees of any type are not deducted from workers' pay or otherwise charged to workers; (v) Prohibit the use of fraudulent or misleading recruitment practices; (vi) Ensure that, upon the end of employment, workers are reimbursed for their return transportation costs (for workers recruited from outside the country); (vii) Ensure there are no unreasonable restrictions on workers' freedom of movement in the facility, nor any unreasonable restrictions on entering or exiting company-provided facilities (including, as applicable, workers' dormitories or living quarters); and (viii) Provide workers with terms and conditions of employment in a language the worker understands.

Child Labor and Young Workers: In accordance with International Labor Organization Conventions No. 138 on Minimum Age and No. 182 on the Worst Forms of Child Labor: (i) Prohibit the employment of workers under sixteen (16) years of age (or local legal age, if higher); (ii) Prohibit the employment of workers under eighteen (18) years of age (or local legal age, if higher) for hazardous working conditions; (iii) Implement an appropriate mechanism to verify the age of workers; (iv) Implement appropriate safeguards to prevent young workers' (16-18 years) exposure to hazardous working conditions; (v) Protect students' rights in accordance with applicable laws and regulations.

¹ GE Vernova prohibits discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, union membership, covered veteran status, protected genetic information, marital or family status or with respect to any other characteristic protected by applicable law in hiring and employment practices, including but not limited to, wages, promotions, rewards, access to training, reduction in workforce or termination.

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Environment, Health & Safety: Comply with all applicable environmental, health and safety (EHS) laws and regulations.

Safe and Healthy Workplace: Provide a safe and healthy workplace, including, but not limited to a commitment to: (i) Maintain applicable permits for fire and emergency planning and maintain a legally compliant emergency response plan; (ii) Comply with GE Vernova's Life Saving Rules and applicable EHS requirements when onsite at GE Vernova sites or GE Vernova customer sites; (iii) Implement and document processes to ensure workers have access to and are wearing required personal protective equipment; (iv) Meet host country safety standards for any housing provided or arranged; and (v) Implement and document risk mitigation practices for high-risk operations.

Environmental Impact and Protection: Maintain environmentally responsible business practices and ensure that you are not adversely affecting the local community, including, but not limited to: (i) Maintain applicable permits, licenses and/or registrations, including for air emissions, water discharges, waste disposal, the use, storage, management and disposal of chemicals, hazardous or dangerous substances, and industrial hygiene; and (ii) Implement appropriate procedures to minimize the risk of the environmental impact of your operations, including impacts from pollution, air emissions, water discharges, waste disposal, and the use of chemicals, hazardous, flammable or dangerous substances.

Responsible Material Sourcing: (i) Prohibit the inclusion of materials and substances from the product development, manufacturing process, packaging and end products sold to GE Vernova that are restricted or otherwise banned under the Montreal Protocol, the Stockholm Convention on Persistent Organic Pollutants, the U.S. Toxic Substances Control Act, the European Union's Restrictions on Hazardous Substances and REACH legislation and other comparable chemical regulations unless, GE Vernova expressly agrees in writing to the inclusion of such materials and substances; (ii) When requested by GE Vernova, provide supporting data on the materials, minerals, composition and substances contained in products sold to GE Vernova and energy used and emissions produced when manufacturing such products on a platform designated by GE Vernova; (iii) For products supplied to GE Vernova containing tin, tantalum, tungsten, and gold ("3TG"), adopt policies and exercise due diligence on the source and chain of custody of 3TG minerals; (iv) If 3TG is in the product supplied to GE Vernova, provide reasonable assurance that Supplier does not directly or indirectly finance armed groups in the Democratic Republic of the Congo or other conflict-affected or high risk areas (as defined by the Responsible Mineral Initiative) and sources in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas or an equivalent and recognized due diligence framework.

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Ethics, Fair Business Practices & Governance:

Working with Governments, Improper Payments and Dealings with GE Vernova Employees and Representatives: Maintain and enforce :(i) a policy requiring adherence to lawful business practices, including a prohibition against bribery; (ii) a prohibition against offering or providing, directly or indirectly, anything of value that would constitute a bribe or a kickback, including, but not limited to cash, gifts, entertainment, offers of employment or other types of benefit, to any GE Vernova employee, GE Vernova representative, GE Vernova customer or to any government official in connection with any GE Vernova procurement, transaction or business dealing; and (iii) provide supporting data to GE Vernova when requested.

Competition Law: Avoid sharing or exchanging any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current GE Vernova procurement.

Intellectual Property: Respect the intellectual property rights of GE Vernova and of third parties, including all patents, trademarks, copyrights and trade secrets.

Security and Privacy: (i) Respect individual privacy rights by collecting, handling and protecting GE Vernova Personal Information responsibly and compliantly; (ii) Implement and maintain appropriate physical, administrative and technical controls that meet GE Vernova standards and are designed to ensure the security and confidentiality of GE Vernova Confidential Information² in order to prevent the unauthorized or unlawful destruction, alteration, modification or accidental loss of GE Vernova Confidential Information; (iii) Protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.

Trade Controls and Customs Matters: Prevent and avoid transferring GE Vernova technical information to any third party without the express, written permission of GE Vernova and comply with all applicable trade control laws and regulations in the import, export, re- export or transfer of goods, services, software, technology or technical data including any restrictions on access or use by unauthorized persons or entities.

Controllershship and Tax Law: Ensure that all invoices and any customs or similar documentation submitted to GE Vernova or governmental authorities or audited by third parties in connection with transactions involving GE Vernova accurately describe the goods and services provided or delivered and the price thereof to

² GE Vernova Confidential Information is information created or collected by GE Vernova that would pose a risk of causing harm to GE Vernova if disclosed to or used improperly, and includes but is not limited to GE Vernova Highly Confidential Information and Personal Information.

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The GE Vernova Supplier Code of Conduct

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ensure that all documents, communications and accounting are accurate and honest and do not to take or participate in any actions that may be viewed as tax evasion or the facilitation of tax evasion.

Conflicts of Interest: Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. A relevant conflict of interest typically occurs when personal interests interfere with or appear to interfere with Supplier's ability to perform the work/services without bias. Suppliers are expected to notify GE Vernova if an actual or potential conflict of interest arises. This includes any situations of potential or apparent conflicts between Suppliers' or their employees' personal interests and the interests of GE Vernova.

Risk Management: Establish a risk-management system to comply with applicable laws and regulations related to the Supplier's operations, products and services and the requirements of this Guide. The risk-management system shall be proportionate to the Supplier's size, operating context, and priority risks.

Due Diligence: Adopt regular and consistent processes to comply with the requirements in this Guide.

Grievance Mechanism & Worker Engagement: Establish an anonymous, fair and publicized grievance mechanism to receive and address concerns or complaints related to requirements of this Guide. Supplier shall give workers a safe environment to raise concerns and feedback without fear of reprisal or retaliation.

Records, Disclosure & Audit Rights: Maintain records to demonstrate Supplier's compliance with the requirements of this Guide and provide GE Vernova with such records upon request. Suppliers agree to cooperate with GE Vernova efforts to assess compliance with this Guide, including by (i) upon GE Vernova's providing reasonable notice to Supplier, permitting GE Vernova to visit, inspect or audit Suppliers and (ii) implementing corrective actions requested by GE Vernova in a timely manner.

GE Vernova reserves the right to suspend or terminate the business relationship if Suppliers fail to comply with the requirements of this Guide.

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Get Help – How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each Supplier is expected to inform GE Vernova promptly of any concern related to this Guide affecting GE Vernova, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. Suppliers also must take such steps as GE Vernova may reasonably request to assist GE Vernova in the investigation of any such occurrence involving GE Vernova and the Supplier. If Supplier's work is related to a U.S. government contract, Supplier must notify GE Vernova of any alleged non-conformance with this Guide.

Prompt reporting is crucial — a question or concern may be raised by a GE Vernova Supplier as follows:

- By discussing with a GE Vernova Manager; OR
- By calling the GE Vernova Ombuds and Open Reporting Helpline: US/Canada - +1 800 261 0643 or London International Hub +44 20 3769 3297; OR
- By emailing ~GE Vernova Corporate Ombuds Corporate.Ombuds@gevernova.com OR
- By contacting any Compliance Resource (e.g., GE Vernova legal counsel or auditor).

Note: Suppliers do not need to be certain that a violation has occurred, but rather should raise a concern when there is a good faith belief that something improper or a violation of law or policy has occurred. GE Vernova fully examines every integrity concern raised and takes necessary remedial actions where appropriate.

GE Vernova forbids retaliation against any person reporting such a concern in a good faith.