



# OUR CODE OF CONDUCT

## HOW WE WORK AND WIN TOGETHER



GE VEROVA



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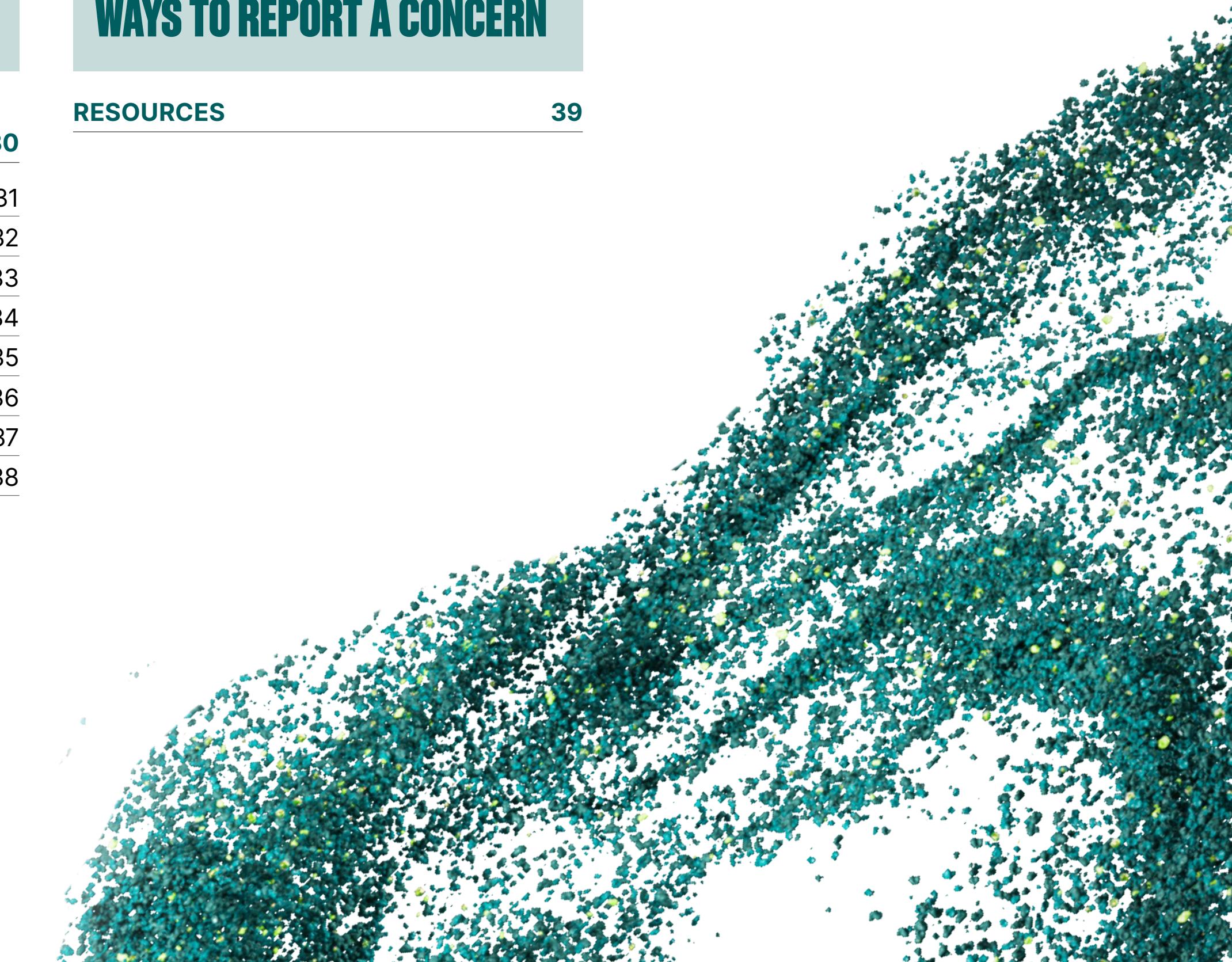
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## A note from our leaders

# THE ENERGY TO CHANGE THE WORLD WITH INTEGRITY

**SCOTT STRAZIK**

Chief Executive Officer,  
GE Vernova

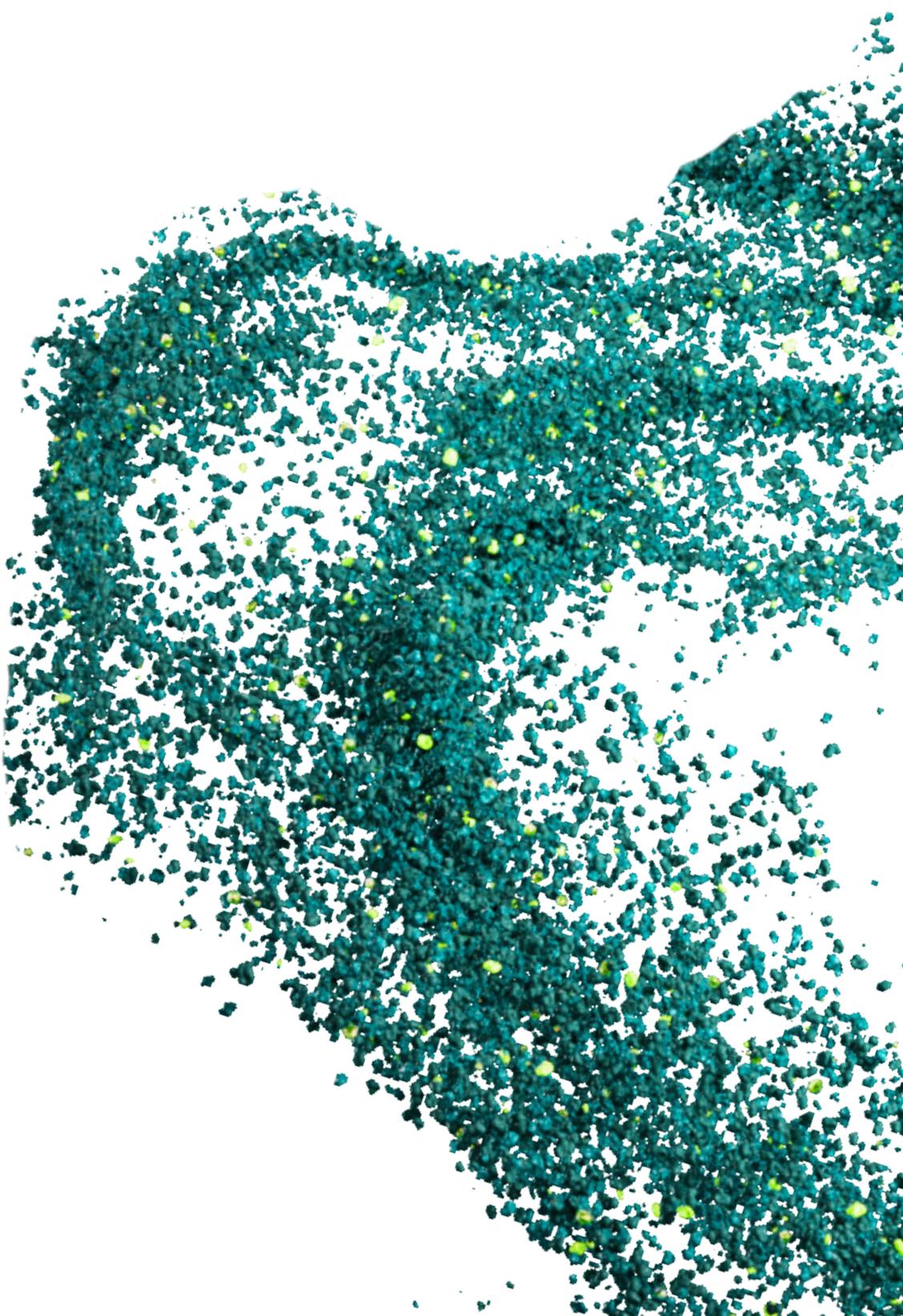
**ELIZABETH MCBRIDE**

Chief Compliance Officer,  
GE Vernova

At GE Vernova, our mission to electrify to thrive and decarbonize the world requires not only operational and technical excellence, but also our unwavering commitment to integrity. And our Code of Conduct serves as a guide for how we go about achieving our mission – what we expect from ourselves and our partners.

As a values-driven organization, our Code of Conduct embodies the GE Vernova Way. When each of us acts with integrity, we contribute to building a stronger culture, delivering for our customers, serving our communities, and fulfilling our mission. This Code is our shared compass: guiding us through complexity, encouraging us to speak up with confidence, and helping us act with purpose and accountability.

This Code is designed to support you, not constrain you. It is intended to be a resource in your daily work so that you can approach decision-making with integrity each and every day. Please read it, understand it, and use it. We want to empower you to make the right decisions and live our values, so that together we can power a better world and drive the Energy of Change.





# WHAT IS THE CODE OF CONDUCT?

The Code of Conduct is our compass. It guides how we work and applies to all of us. We should know it, understand it, and live it.

GE Vernova's mission is to electrify to thrive and decarbonize, accelerating the transition to more reliable, affordable, and sustainable energy. We do this with Integrity, through Innovation, and as One Team.

Our success depends on all of our employees across the world committing to doing work the GE Vernova Way. These five principles reflect our unique way of delivering on our purpose, driving value for stakeholders, and achieving measurable, sustainable success.

## THE GE VERNOWA WAY

### WE DRIVE INNOVATION

in everything we do to electrify and decarbonize the world

### WE SERVE OUR CUSTOMERS

with pride and a focus on mutual success and long-term impact

We challenge ourselves to be better every day

### LEAN IS HOW WE WORK

We break boundaries and cross borders

### TO WIN AS ONE TEAM

### WE ARE ACCOUNTABLE

individually and collectively to deliver on our purpose and commitments

## What is it?

The Code of Conduct is our guide to thriving in a culture of integrity so we can live the GE Vernova Way every day – through how we speak, behave, and make decisions.

It sets clear expectations for how we conduct ourselves, treat others, and uphold our Company values. It connects our values to real-life behavior, helping us do the right thing, even when it is not easy.

Our Code of Conduct also reinforces our shared responsibility to comply with the laws and regulations in every country where we operate. This commitment reflects our promise to act with integrity in our engagement with each other, our trusted business partners, and to the countries and communities around the world where we live and operate.

While the Code of Conduct does not address every possible scenario, it equips you with the principles to navigate ethical decision-making while working at GE Vernova. Our policies provide the specific information on how to meet our expectations, and links to applicable policies are provided in each related section. When in doubt, reach out to the appropriate resources for guidance.

## Who is it for?

The Code of Conduct and its corresponding policies apply to everyone who works for us or represents us. That includes GE Vernova directors, officers, employees, subsidiaries, and controlled affiliates.

When working with third parties such as consultants, sales representatives, distributors, and independent contractors, we ensure they understand and comply with relevant aspects of GE Vernova's Code of Conduct and policies.

We expect all employees to follow our Code of Conduct and applicable laws, acting with integrity in every decision and interaction.

Employees who do not comply with the requirements of the Code of Conduct will face disciplinary action in accordance with applicable local laws, policies, and agreements, potentially up to and including termination of employment.

## More guidance

⇒ [GE Vernova Integrity Guide for Suppliers, Contractors & Consultants: The GE Vernova Supplier Code of Conduct](#)



# OUR EXPECTATIONS

Getting the job done right means conducting ourselves professionally, honestly, and with integrity.

We have the energy to change the world, and this starts with how we behave at work: we get things done the right way, every day. That means showing up with respect, responsibility, and integrity in everything we do.



## Our expectations

# EMPLOYEE RESPONSIBILITIES

### Fostering a respectful workplace



As employees, each of us plays a vital role in upholding the highest ethical standards and fostering a respectful workplace.

One of the principles of the GE Vernova Way is to win as One Team. We all have a right to a safe, fair, and respectful workplace, so we prohibit any kind of discrimination, bullying, sexual harassment, or harassment based on race, color, religion, national or ethnic origin, sex, gender identity, sexual orientation, marital status, age, disability, military status, or any other characteristic protected by law.

#### In practice

Honoring the Code of Conduct means:

- ✓ **Show up fit for work**, safe, focused, and unimpaired
- ✓ **Know and follow** the laws and policies that apply to our work, including this Code of Conduct, and complete required training on time
- ✓ **Speak up** when something does not look or feel right

- ✓ **Cooperate** fully with any internal or regulatory investigation
- ✓ **Never retaliate** against someone who raises a concern in good faith
- ✓ **Be aware** of developments or changes in our area that may impact GE Vernova's compliance with laws and regulations or add reputational risk

**Q** A team I support is under pressure to meet a tight deadline, and one of the supervisors hinted at skipping a step in our review process to save time. It is not my direct responsibility, but I'm concerned. Should I say something?

Yes. We all have a shared responsibility to protect the Company's integrity, regardless of role or reporting line. If you are aware of potential shortcuts or behavior that may risk noncompliance – especially if it could impact safety or quality – you are not just encouraged, but expected, to raise the concern. Remaining silent, even when you are not directly involved, puts the Company at risk.

#### More guidance

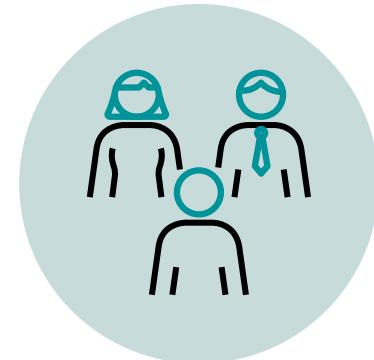
→ [GE Vernova Way](#)

→ [Respectful Workplace Policy](#)

## Our expectations

# PEOPLE LEADER RESPONSIBILITIES

### Curating a culture of integrity



People Leaders shape our culture by setting and reinforcing expectations, and leading by example.

GE Vernova holds its People Leaders accountable for fostering a culture of compliance, and this includes leading with integrity, role-modeling behaviors, embodying the GE Vernova Way, and helping everyone to understand and follow the Code of Conduct. Because People Leaders set the tone and expectations for others, they are held to a heightened standard of leading with integrity.

#### In practice

Honoring the Code of Conduct means:

- ✓ **Fostering a workplace** that does not tolerate discrimination, bullying, or harassment
- ✓ **Being ethical** in decisions, actions, and communication, and never compromising integrity in order to meet internal deadlines, customer demands, or performance metrics
- ✓ **Building trust** by encouraging questions, concerns, and opinions from everyone
- ✓ **Acting quickly** and diligently when issues arise, and seeking help when unsure of what to do
- ✓ **Setting clear expectations** for the team and holding them accountable
- ✓ **Preventing, detecting, escalating, and responding** to breaches of policies and the Code of Conduct
- ✓ **Promoting open reporting** and ensuring employees know how to raise a concern



One of my employees reported a situation that does not rise to a policy violation but indicates a troubling pattern of behavior. There is no formal rule being broken – do I still need to escalate it?

Yes. As a leader, you are expected to recognize early signs of potential misconduct or workplace issues and elevate concerns appropriately – even when they fall into a gray area. Your role includes fostering a respectful workplace and ethical culture, protecting employees from retaliation, and ensuring issues are handled by the right stakeholders and through the right internal processes. Ignoring patterns that seem “low risk” can allow bigger issues to develop over time, so raise issues early and often.

#### More guidance

→ [People Leader's Guide to Integrity](#)



# MAKING ETHICAL DECISIONS

Living our culture of accountability begins with making thoughtful, principled decisions we can stand behind.

Sometimes when we have to make a decision, the right path may not be clear. We may not be sure about how to interpret or apply a policy, or we may feel conflicted about how to manage a difficult situation at odds with our policies.

Regardless of the complexity, each of us is responsible for the choices we make.

Accountability means owning our actions and ensuring they align with our Company values and the trust placed in us. The decision-making guideline on the following page is designed to help us reach the right outcome – one that maintains our culture of integrity and is consistent with our mission and brand.

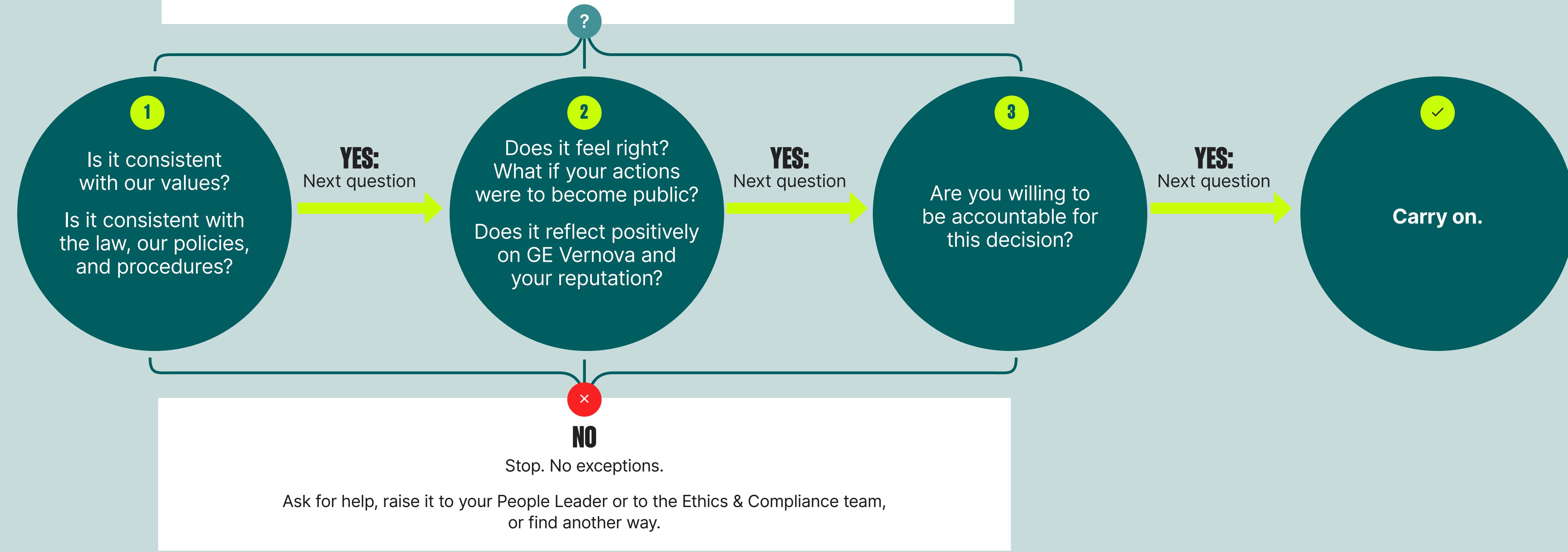


# DECISION-MAKING GUIDELINE

## UNSURE

Ask for help. Find the right way. Do not act until you confirm that the decision is aligned with our values, the law, our policies, and procedures.

Ask. Before acting, understand the perceptions created by, and implications of, your actions. Consider how your actions will be viewed by others if they were to become public.



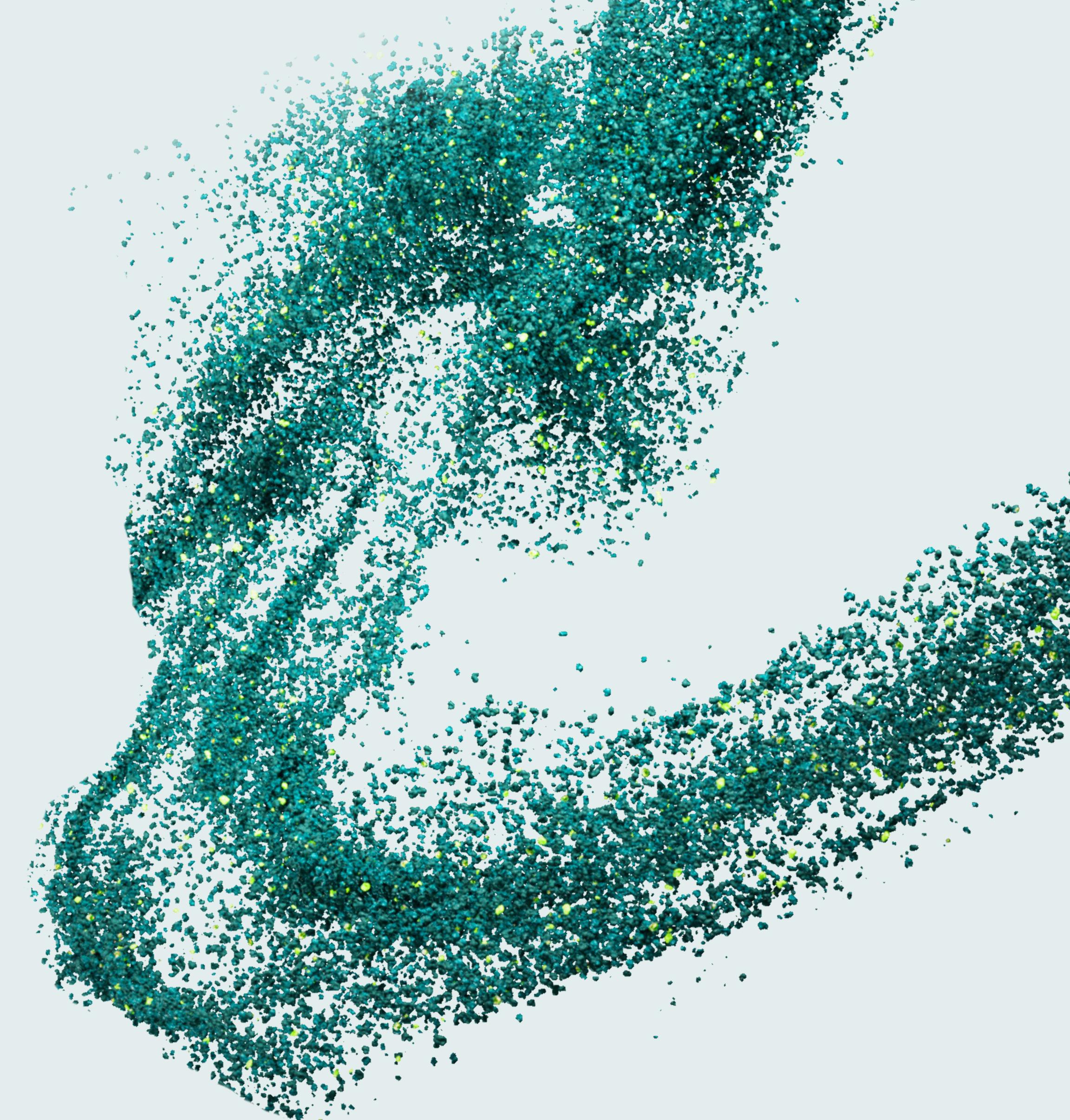


# SPEAKING UP

Your voice matters. Raising a concern is simple and straightforward, and expected of all employees.

Speaking up is the foundation of our culture of integrity. It is a pillar of how we work together, ethically and respectfully. A speak-up culture is about creating an environment where every individual's voice is valued. When one person speaks up, it creates space for others to do the same.

Building trust requires we do the right thing and speak up if we have questions or concerns. If you do not know the right thing to do, ask for advice from your People Leader or the Ethics & Compliance team.





# SPEAKING UP

If you see, suspect, or are told about an activity that violates or potentially violates our Code of Conduct, policies, or the law, report it. Looking the other way or letting someone else take the lead may seem easier, but unethical or unlawful behavior affects us all, and it affects the Company.

When a company investigation is underway, employees are expected to cooperate fully and honestly. This may include participating in an interview, answering questions truthfully, or providing documents and information that are requested. This also includes making data, accounts, and devices accessible to the Company where they contain business-related communications and records.

Cooperation helps ensure that issues are reviewed timely, thoroughly, and accurately. Failing to cooperate can hinder the integrity of the investigation process.

## Raise a Concern

Our [Integrity Portal](#), [email](#), or [hotline](#)

Your Ombudsperson

People Leaders

Human Resources

Ethics & Compliance

Legal



## Good to know

Examples of types of concerns:

- ☒ Repeated offensive jokes or comments about a colleague's race, gender, or religion creating a hostile work environment
- ☒ Improper revenue recognition or other financial reporting issues
- ☒ Supplier selection process was not followed
- ☒ A supervisor making unwelcome advances toward an employee or implying promotions depend on accepting such behavior
- ☒ Retaliation for stopping work due to a safety or compliance issue
- ☒ Potential conflicts of interest



# SPEAKING UP

You can choose to report concerns anonymously if you prefer, through any of the available channels – we take all reports seriously, whether named or anonymous. If you are comfortable sharing your name, it allows us to follow up with questions and keep you informed of the status. Your identity will be kept confidential to the fullest extent possible. If you choose to raise a concern anonymously, provide as much detail as you can (e.g., names/SSOs, location, and other relevant details, etc.).

## Protection for speaking up

We prohibit retaliation against any employee who in good faith asks questions or reports concerns through the listed channels. We will take appropriate action against employees found to have participated in retaliation, up to and including termination of employment. If you believe you have been retaliated against, please contact Ethics & Compliance immediately.

## Investigations process<sup>1</sup>



<sup>1</sup> The Ethics & Compliance team tracks average days to close and targets 60 days.

<sup>2</sup> If applicable. Not all integrity concerns result in disciplinary action. Many cases result in coaching, communications, training, or process improvements that help make the Company a safer place for all employees.

# SPEAKING UP

**Q** I saw or experienced something at work that did not seem right, but I was not sure who to raise it with. How do I know the right person to contact?

It depends on the nature and urgency of the situation:

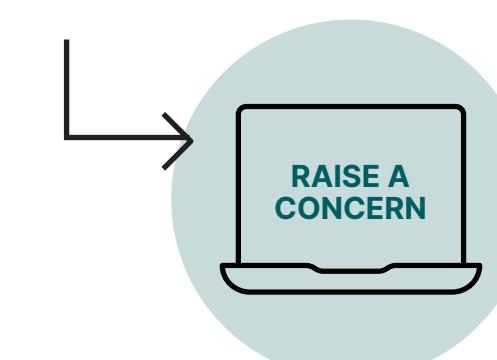
**For emergencies or safety threats** such as an active shooter, trespasser, or criminal activity, **contact local law enforcement or emergency responders immediately**. Your first priority should always be the safety of yourself and those around you.

**For operational or site-level issues** like a flooded parking lot, broken security equipment, or a malfunctioning entry system, **report the issue to your site leader or plant management** so it can be resolved **locally**.

**For interpersonal or employee-relations type** matters, we encourage open, adult-to-adult dialogue. When possible, provide respectful feedback directly to the individual or seek guidance from your People Leader to resolve the issue in the moment. If the behavior does not change or the concern persists, report it through the appropriate channels (as explained on the previous page).



You are never expected to interpret laws or make legal judgments on your own. What we do expect is that you recognize situations where a law, regulation, or policy could be implicated and ask for help rather than try to resolve it yourself. You can start by visiting the Integrity Portal or clicking the Raise a Concern icon on your desktop.



## More guidance

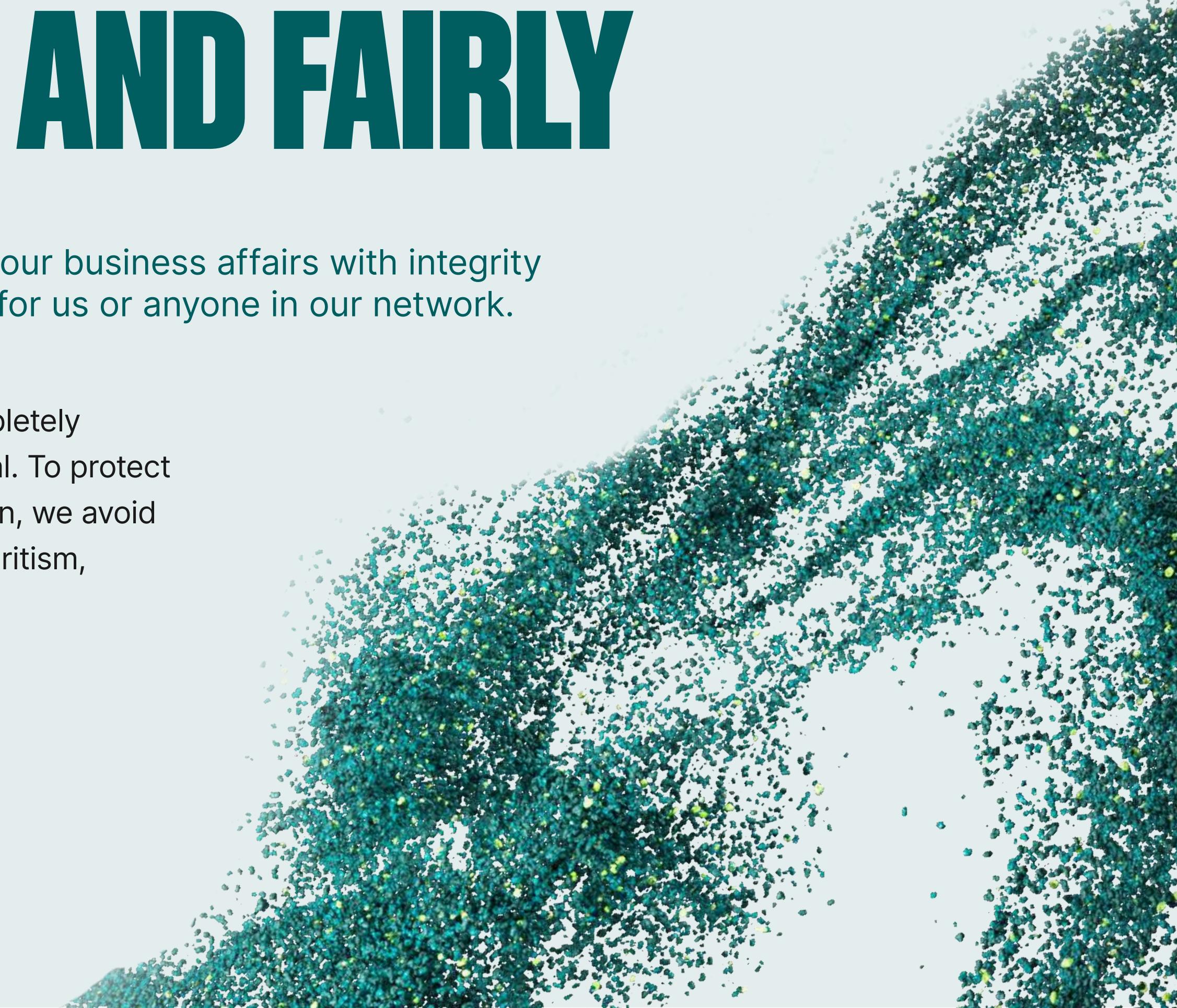
- [Report a concern via our Integrity Portal](#)
- [Find your Ombudsperson](#)
- [Open Reporting FAQs](#)
- [Hotline numbers](#)



# DOING BUSINESS HONESTLY AND FAIRLY

We respect the rules and conduct our business affairs with integrity so there are no unfair advantages for us or anyone in our network.

Our approach to doing business is completely ethical at every level, from global to local. To protect our operations and uphold our reputation, we avoid even the appearance of corruption, favoritism, or undue advantage.





## Doing business honestly and fairly

# CONFLICTS OF INTEREST

We keep personal interests separate from our professional responsibilities.

We prioritize transparency in our behavior as well as our communication, and we avoid outside and inside interests that could be at odds with the Company's interests, or could create the perception that we are putting a personal interest above that of the Company.

A conflict of interest arises when personal priorities, such as business activities or affiliations outside of GE Vernova, or personal relationships with other employees, customers, or suppliers, could bias or could be perceived to bias our decisions at work. We have a duty to disclose these situations.

To manage actual and potential conflicts, they need to be disclosed by completing a Conflict of Interest form. This applies throughout the duration of your employment with GE Vernova, not just at the time of onboarding. Disclosing a potential conflict does not mean anyone has done something wrong, but it helps us to be transparent and manage any risk.

### Actual or potential conflicts can include:

- ⌚ Financial interest in a company where you could benefit from GE Vernova's business with the company
- ⌚ Working with, hiring, or supervising close friends or family
- ⌚ Outside employment (paid or unpaid)
- ⌚ Outside board memberships
- ⌚ Gifts from suppliers



### Good to know

If you are working on something that relates to or could be perceived to relate to your role at GE Vernova, it is important to disclose the activity to ensure it does not present a conflict. The best course is to consult your People Leader or the Ethics & Compliance team and follow the disclosure process before continuing.



I'm a digital engineer at GE Vernova, and outside of work, I've been developing a fitness-tracking app for a small startup. It's unrelated to energy, and I only work on it during my personal time. But the app uses similar architecture and tools to those I use in my GE Vernova role. Is this a problem?

It might be. Even if the industry is different and you are working on it in your own time, the overlap in skills and technology could raise concerns about conflicts of interest or improper use of Company knowledge, tools, or resources. Soliciting employees to use the app may appear to be an improper use of your network too.

### More guidance

- [Conflicts of Interest Policy](#)
- [Conflicts of Interest Disclosure](#)

## Doing business honestly and fairly

# GIFTS, ENTERTAINMENT, AND HOSPITALITY

We keep business courtesies aligned to our values as trusted business partners.

Fostering close customer and supplier relationships across the energy sector helps us accelerate our mission and have a positive impact. Sometimes we give, contribute to, or receive gifts, dining, or entertainment experiences. This is an acceptable business practice designed to foster and build relationships, but we avoid anything too lavish or excessive because it can give the perception of being improper or in a position of undue influence.

While business courtesies are intended and most often used to build legitimate relationships, they can also be used to influence decision-making. We believe decisions should be based on the facts of the offering and not induced by gifts or entertainment.

Nothing we accept or give should create the appearance of favoritism or influence, and business entertainment should always remain appropriate and professional.

Before participating in or offering any business courtesy, you must ensure that you have obtained the necessary approvals in accordance with Company guidelines and relevant regulatory standards. This diligence helps safeguard against potential conflicts of interest and ensures that all activities are conducted in an ethical and compliant manner.



### Good to know

Always consider how a gift might be perceived – even after business is concluded – and prioritize transparency and integrity.





## Doing business honestly and fairly

# GIFTS, ENTERTAINMENT, AND HOSPITALITY



**The contract negotiation with one of our suppliers just finished, and they want to thank me by giving me front-row concert tickets. Since the deal is done, is it okay to accept?**

No. Even though the contract is finalized, accepting expensive gifts from suppliers can still create a perception of favoritism or undue influence, and may violate Company policy. Gifts should be modest, infrequent, and appropriate to maintain trust and professionalism. When in doubt, consult your People Leader or the Ethics & Compliance team before accepting any gifts that could be seen as excessive.

### In practice

- ✓ Reasonable expenses associated with a visit to our facilities for training, product demonstration, or promotional activities
- ✓ Modest or customary meals
- ✓ GE Vernova branded promotional items
- ✓ Receiving gifts of nominal value
- ✗ Cash or cash equivalents, such as gift cards
- ✗ Frequent gifts from or to the same organization
- ✗ Adult entertainment, or any other entertainment or event that could cause harm to our reputation, even if it is a local custom

### More guidance

- [Gifts, Entertainment & Hospitality Policy](#)
- [Business Courtesies Policy](#)
- [Conflict of Interest Disclosure](#)



## Doing business honestly and fairly

# ANTI-BRIBERY

Bribes have no place in our business.

We maintain ethical business practices always and without exception.

Bribery and corruption violate the law, our policies, and our values.

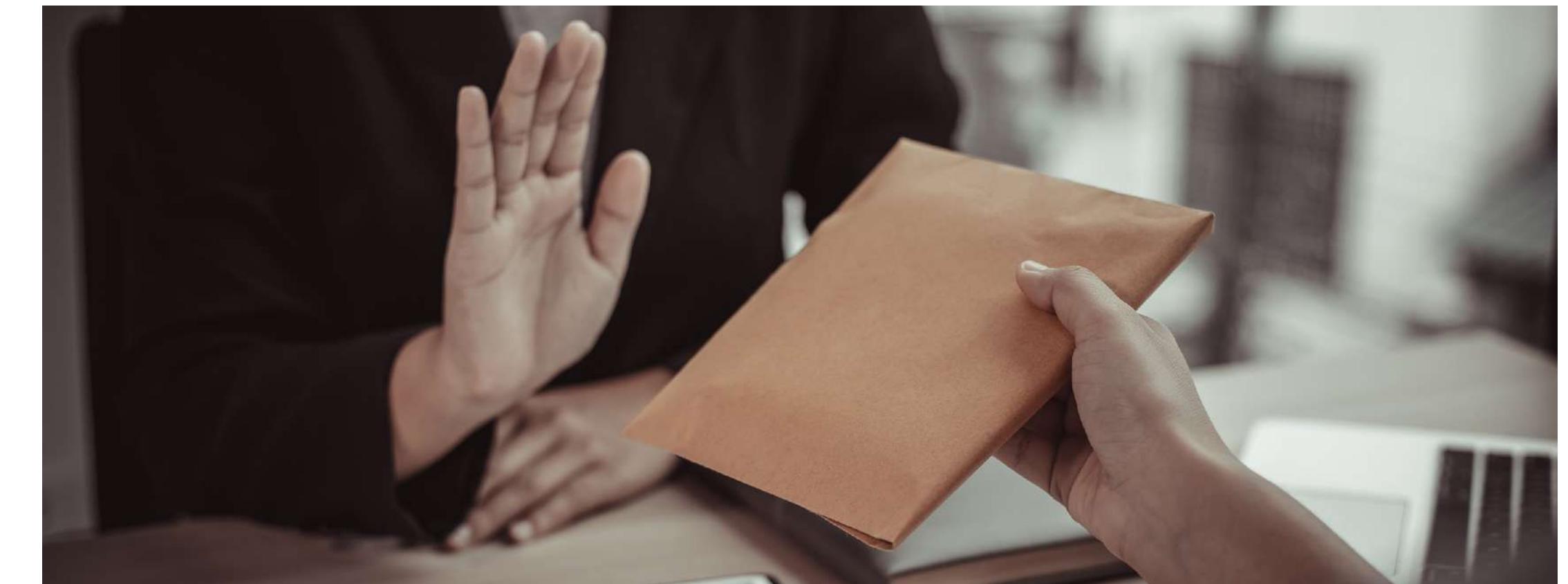
We never offer or accept anything of value in order to get business, keep business, or gain an unfair advantage.

We do not tolerate acts of bribery in any form, regardless of the people involved or the perceived importance of the relationship. Our success is based on the quality of our product and service offering – not on unethical or illegal behavior. Bribes could include gifts, payments, entertainment, travel, or anything of value, exchanged with the expectation of improper assistance or consideration in business, even if none was actually given in return. GE Vernova prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.



During the process of obtaining a permit, a government official hinted that a “small bonus” to a local agent could help speed up the approval process for our permit. The payment is supposedly a common local practice and our competitors are rumored to have made such small payments in the past. Is it okay to proceed?

No. Any payment made to influence a decision – whether directly or indirectly through an agent – is considered a bribe and is strictly prohibited. Even if such practices are common locally in the context of licenses and permitting, we uphold ethical standards everywhere we operate. Engaging in or facilitating these payments risks serious legal harm. Always raise these situations with Ethics & Compliance or Legal immediately.



### More guidance

→ [Anti-Bribery Policy](#)

→ [Business Courtesies Policy](#)

## Doing business honestly and fairly

# FAIR COMPETITION

### We do not cheat to compete, so when we win, we win fairly.

In a competitive marketplace, being a successful leader means winning while playing by the rules. Gaining an unfair advantage for GE Vernova by holding or sharing confidential information such as pricing, or engaging in unofficial arrangements with customers or competitors, is cheating.

We expect our employees to comply with competition laws by avoiding any form of unfair or deceptive conduct. Complying with competition laws is essential to maintaining fair and ethical business practices. We will respect the rights of our competitors, and we will not make inaccurate statements about their products or services or our own.

Employees must avoid any agreements or conduct that could unlawfully restrict competition, such as price fixing, market allocation, or bid rigging.

Employees should also refrain from discussing sensitive competitive information with competitors, including pricing strategies, production capacities, or go-to-market plans. It is crucial to understand and take steps to ensure you are adhering to relevant competition laws in all countries where the Company operates.

We only gather competitive intelligence through legal and honest means. We will not ask employees to share confidential information from a previous employer. We will not resort to any deceptive or manipulative practices or use any unacceptable sources, including confidential documents or communications not intended for GE Vernova or the recipient.

We build market and brand loyalty by delivering quality products, not by engaging in unfair or anti-competitive practices.



I'm talking to a customer, and he is proposing to show me a competitor quote. What should I do?

Politely decline. Never accept documents marked as confidential or that you believe are confidential. If you are sent confidential information, for example in an email, do not share it. Contact Legal or Ethics & Compliance without delay – there may be time-sensitive reporting requirements around it.

### More guidance

↪ [Fair Competition Policy](#)

## Doing business honestly and fairly

# INTERNATIONAL TRADE

We comply with all export control, economic sanctions, and customs laws and regulations.

We conduct business in over 100 countries, so we are careful to comply with import and export laws from around the world to ensure that we can design, make, and ship our products and services worldwide. This involves compliance with customs regulations, import and export procedures, and global export controls. As a U.S.-based company, we cannot cooperate with any boycott or other restrictive trade practice not authorized by the U.S. government.

We are accountable for making sure transactions are accurate, transparent, and compliant with relevant laws, by using approved channels, applying the correct classifications, and routinely conducting due diligence on all parties involved. We comply with sanctions across all countries in which we operate. We do this responsibly and before we engage in any transaction. We expect all of our employees to know, understand, and comply with the requirements for moving our products, services, and technologies across borders.

### In practice

- ✓ Ensure that all parties to the transaction are not sanctioned and the shipment is not destined for an embargoed country
- ✓ Know, understand, and follow all business procedures around imports and exports and only use GE Vernova-approved customs agents
- ✓ Provide accurate, complete, and timely information to your business customs teams for import transactions, including properly classifying goods
- ✓ Consult with the International Trade Controls (ITC) team before claiming reduced duty rates to ensure compliance with special program requirementscompliance with special program requirements



### What is an import?

The inbound movement of a physical item into one country from another country. Import and customs requirements typically focus on physical items only.

### What is an export?

The outbound movement of a physical item, software, or technical data and technology (including know-how) out of one country and into another country – including emails, file transfers, source code compilation, and even oral discussions – in addition to physical items. In some jurisdictions, the movement may physically occur within the same country between people of different nationalities (i.e., a U.S. national employee sharing technical documents with a U.K. national employee who are both physically located in the U.S. at the time of sharing).

### What are sanctions?

Legal and regulatory measures imposed by governments or international bodies to restrict or prohibit trade and financial interactions with specific countries, entities, or individuals.



**Doing business honestly and fairly**

# INTERNATIONAL TRADE



**Q** A long-time supplier informed me they recently acquired a new partner company. I'm not familiar with this partner, but I found out from the recent diligence that they are listed on a government watchlist. Should I continue working with them?

No – it's important to pause and not proceed. Even if they are indirectly connected through a partner, engaging with sanctioned entities can expose the Company to serious legal and regulatory risks. You should immediately tell your People Leader and ask the Ethics & Compliance or ITC teams to review the situation and determine the appropriate next steps. Staying vigilant helps protect our business and ensures compliance with international trade laws.

## More guidance

- ⇒ [International Trade Compliance Policy](#)
- ⇒ [ITC Portal](#)

## Doing business honestly and fairly

# SUPPLIER ENGAGEMENT

We work closely with suppliers worldwide to ensure they abide by the same ethical standards as we do.

Our suppliers are more than vendors – they are partners in delivering safe, innovative, and sustainable solutions to the world. That is why we expect our entire global supply chain to share our dedication to ethics, integrity, and compliance.

Our expectations of suppliers include a respect for fundamental human rights, fair treatment of workers, safe and healthy working environments, and following fair processes for winning work.

Our Sourcing team ensures suppliers meet our expectations through due diligence, ongoing monitoring, and adherence to our Supplier Integrity Guide. But integrity in the supply chain is everyone's responsibility. Employees outside of Sourcing play a role in identifying and escalating concerns when something does not look right.

We use only those suppliers who share our commitment to integrity, are qualified to provide the goods and services for which they are selected, and comply with all applicable laws, regulations, and GE Vernova policies.

### In practice

- ✓ Be alert to potential red flags such as unsafe working conditions, environmental harm, or signs of human rights abuses at supplier sites
- ✓ Never share confidential information or personal data with suppliers unless a proper confidentiality agreement is in place
- ✓ Direct all supplier-related questions, concerns, or activities to the appropriate Sourcing contact, and follow our Sourcing and Procurement policies



### More guidance

- [Supplier Relationships Policy](#)
- [GE Vernova Integrity Guide for Suppliers, Contractors & Consultants: The GE Vernova Supplier Code of Conduct](#)
- [Respectful Workplace Policy](#)
- [Human Rights Policy](#)



## Doing business honestly and fairly

# INTERACTIONS WITH GOVERNMENT ENTITIES

Without exception, we comply with global laws and regulations as well as Company policies when doing business with government entities.

In our mission to electrify to thrive and decarbonize, GE Vernova engages with government entities in the U.S. and around the world.

In this highly regulated environment, maintaining an ethical and transparent approach to our engagement is critical. Different countries and regions have specific procurement laws, so we need to take particular care to understand and comply.

We only pursue government business after first partnering with Legal. We also follow a strict code of diligence whether we are contracting directly or indirectly with a government or government-linked entity.

We commit to comply with all contract terms and conditions, laws, and regulations applicable to GE Vernova when working with governments, and we remain truthful and accurate when dealing with all government or government-linked entities. We maintain controls and procedures that are focused on our government business activities that are designed to ensure our ongoing compliance.

**Q**

**A U.S. government engineer I met on a prior job has offered to brief me on the specific criteria the government will use on an upcoming project. He wants us to get a fair shot at the contract. Can I accept his offer?**

Not without finding out if he has been expressly authorized by the contracting officer to give you this briefing. If he has, you should make a written record of the conversation and partner with Legal before engaging.

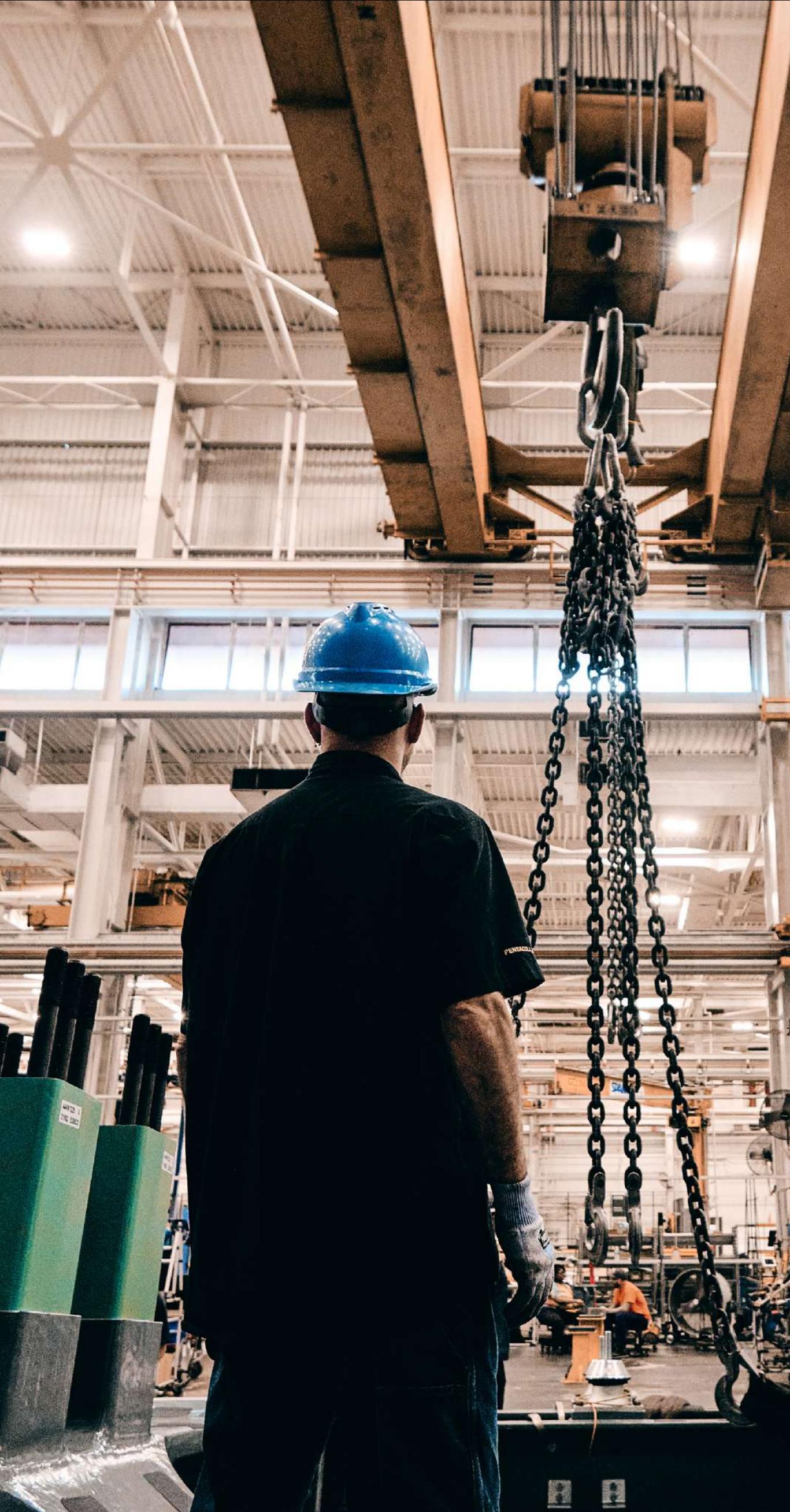


### What is a government entity?

A government entity includes any federal, state, or local government as well as any department, agency, or instrumentality that belongs to or is controlled by it (such as a state-owned or state-controlled entity). This includes public international organizations such as the UN and World Bank, and political parties. Private companies providing public services (such as utilities) may also be subject to public procurement rules. We comply with any applicable public procurement regulation that applies to us, our customers, or suppliers.

### More guidance

⇒ [Working with Governments Policy](#)



# DRIVING ACCOUNTABILITY

We are all responsible for keeping our workplace safe and secure.

Together, we work hard to safeguard our people, our environment, and the communities in which we operate, as well as keep our operations and data secure. We only start work when it is safe, and we stop work when it is not safe.



## Driving accountability

# SUSTAINABILITY

Our mission to electrify to thrive and decarbonize the world has never been more vital. We are helping build a more sustainable electric power system that powers economies, supports communities, and delivers the electricity that is vital to health, safety, security, and quality of life.

Sustainability is at the core of who we are. Guided by our Sustainability Framework, and built on the four pillars of Electrify, Decarbonize, Conserve, and Thrive, we are advancing progress toward a cleaner, more resilient energy future. Each pillar represents a focused commitment: expanding access to sustainable electricity, reducing carbon emissions, safeguarding natural resources, and fostering safe, fair, and responsible workplaces and communities.

Through these efforts, we integrate sustainability into how we innovate, operate, and serve our customers. It is how we fulfill our purpose and make a lasting impact for people, the planet, and generations to come.



### More guidance

- [Sustainability Policy](#)
- [Sustainability Website](#)

## Driving accountability

# HUMAN RIGHTS

We stay alert to uphold human rights standards everywhere we work.

GE Vernova helps generate the world's electricity across developed, developing, and emerging economies, and so we need to ensure everyone in our business and value chain is treated fairly and with dignity.

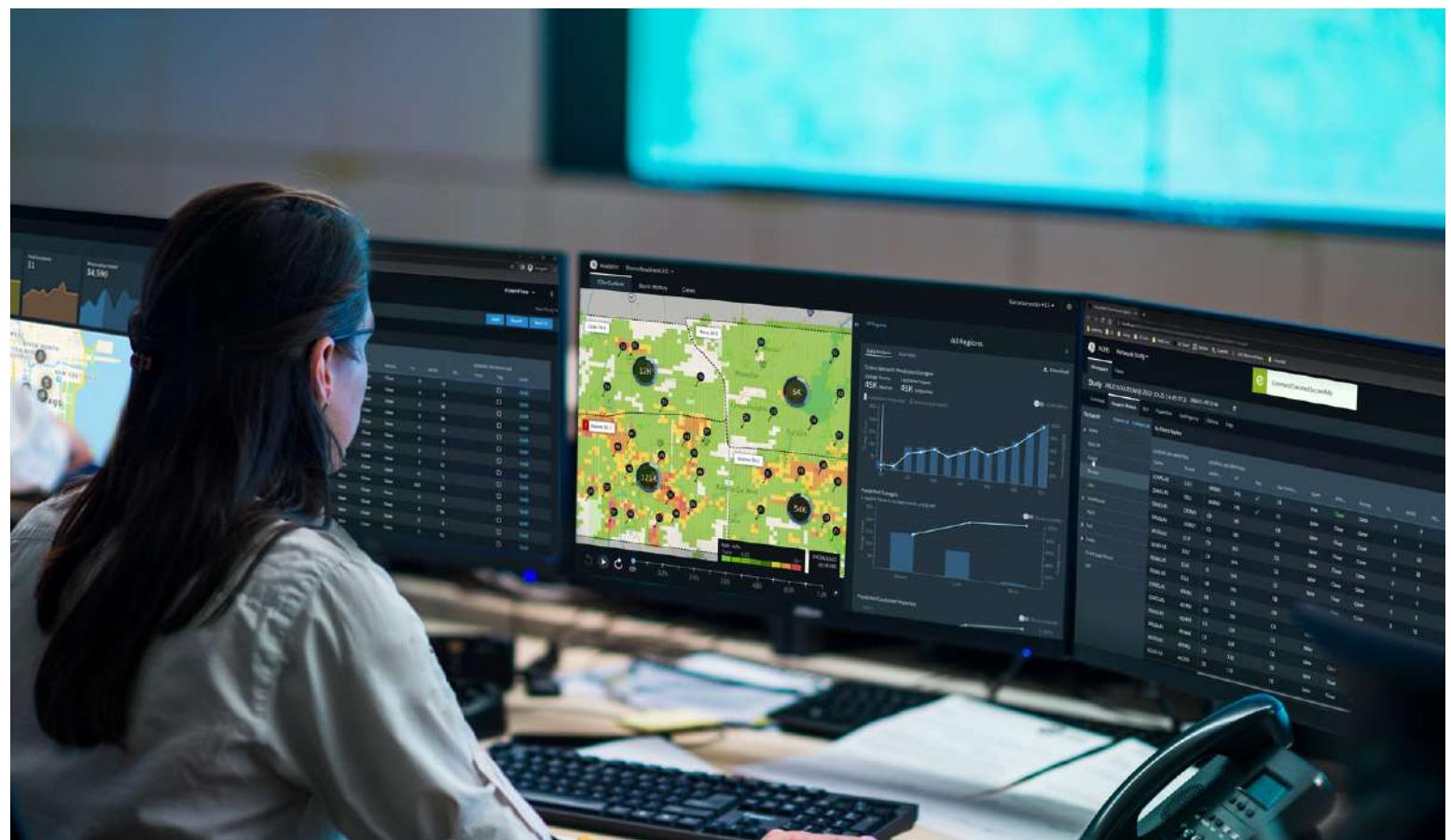
We are committed to decent and safe working conditions, freedom of association, no forced or child labor, as well as respect for community security, dignity, safety, and environmental stewardship within our Company, among our suppliers, contractors, and business partners.

If we come across anything that contravenes these commitments, we need to report it to a People Leader or through an Open Reporting channel.

### Things to look out for

- ✓ Workers who appear under the age of 16 or the local legal working age, whichever is higher
- ✓ Unsafe working conditions or unsanitary living conditions
- ✓ People Leaders who are refusing to allow you to engage with workers

- ✓ Signs of workplace harassment, bullying, discrimination, or violence
- ✓ Rumors of unfair or illegal practices like recruitment fees for jobs, not being paid appropriately or given adequate rest breaks, or being coerced into working, e.g. through passport withholding



### More guidance

- [Human Rights Policy](#)
- [GE Vernova Integrity Guide for Suppliers, Contractors & Consultants: The GE Vernova Supplier Code of Conduct](#)

## Driving accountability

# ENVIRONMENT, HEALTH, AND SAFETY

Putting safety and wellbeing first, everywhere we work, every day, helps us win.

Our environmental, health, and safety (EHS) policies are designed to keep everyone safe and well, and ensure everyone working for us, or on our behalf, goes home safely at the end of the day.

We comply with all the EHS laws that apply to our operations, and we develop safe work practices for everyone to follow so we can avoid injuries. We assess and manage the EHS risks whenever we are planning a new activity, whether it is designing a new product, entering a new market, constructing a new facility, applying lean principles to our existing manufacturing lines, or acquiring a new business.

### We all play a part in keeping everyone safe by:

- ✓ Following our Life Saving Rules
- ✓ Completing all EHS training sessions on time
- ✓ Following our processes to identify EHS concerns at sites
- ✓ Stopping any work which seems unsafe or you are unsure about, including offsite

### In practice

Examples of EHS red flags to report:

- ✗ Lapses in security or emergency preparedness
- ✗ Poorly maintained tools or equipment
- ✗ Lack of or faulty protective equipment, including machine guards or personal protective gear
- ✗ Unsafe driving
- ✗ Not using lock-out/tag-out (LOTO) procedures or fall protection
- ✗ Wastes or hazardous products not being used, handled, or disposed of properly



### More guidance

- Environment, Health, and Safety Policy
- Life Saving Rules
- EHS Portal

## Driving accountability

# SECURITY

We protect what matters the most – our people – wherever they work.

We want everyone who works for GE Vernova, or does work on our behalf, to feel safe and secure at work – whether in an office, at a site, or while traveling. We never tolerate threats or acts of violence, or anything that makes someone feel unsafe – and if we ever see it, we must report it.



Before traveling for work, employees should check and update the emergency contact information in their personal GE Vernova travel profile. And when traveling, employees should always stay aware of their surroundings. If there is any type of event (natural or man-made) that could cause risk while traveling, we will want to check that employees are safe. If we cannot get in touch, we will reach out to the person's emergency contact while continuing to monitor the situation.

Our global security teams are available 24/7 to help with any concerns.



**A coworker told me they lost their badge but asked me to let them into the building to avoid having to report it. Should I let them in?**

No – you should direct them to your site's security. Even if you know and trust the person, access badges are assigned to individuals for a reason: they help maintain the security of our facilities. If a badge is lost, it must be reported immediately so it can be deactivated and replaced. Letting someone bypass the system – even as a favor – violates security protocols and can expose the site to unnecessary risk.

## More guidance

→ [Security Policy](#)

→ [Security Risk & Crisis Management \(SRCM\) team](#)



## Driving accountability

# QUALITY

It is our responsibility to provide safe, compliant, and sustainable products and services that meet the needs of our employees, customers, and stakeholders.

We prioritize Safety, Quality, Delivery, and Cost – in that order. We hold ourselves accountable to these principles by starting work only when it is safe to do so, and after quality controls are in place. We have the power to Stop Work if safety and quality expectations are not met, and we expect the same from our employees, contractors, and partners. Our objective is for all functions across the value chain (Win, Design, Buy, Build, Execute) to act based on a zero defect mindset both in manufacturing and non-manufacturing areas.

Everyone has a role to play in ensuring we deliver high quality products to our customers. We must comply with laws and regulations relating to the safety, quality, and performance of our products, and to follow GE Vernova's policies, procedures, and standards.

We embrace Safety, Quality, Delivery, and Cost (SQDC), in that order, as our compass, as we challenge ourselves to be better every day.

## S SAFETY

GE Vernova aims to provide a safe working environment for our employees and partners,

## Q QUALITY

deliver quality products and services

## D DELIVERY

on-time to our customers, and

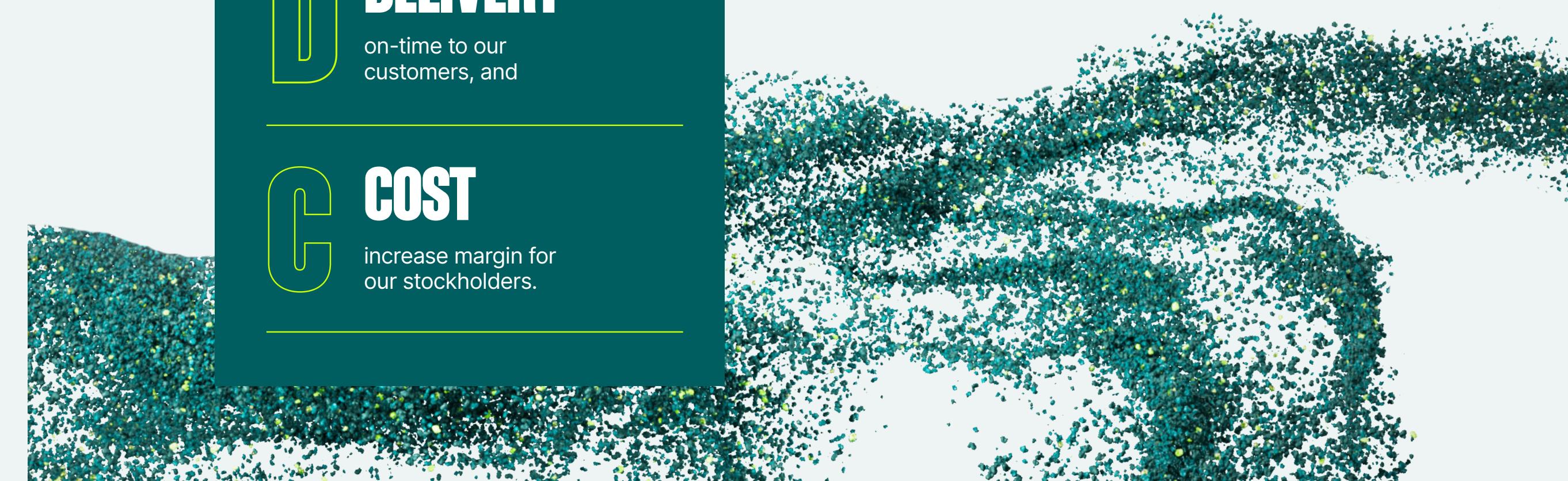
## C COST

increase margin for our stockholders.

We should never bypass quality controls or take shortcuts that could compromise our products and services or our culture of integrity. If we ever come across product or process defects or signs of deviations that could compromise the safety or integrity of our products or services, we must never assume that someone else will deal with it; instead we must stop work immediately and report our concern to a People Leader or leader of the Ethics & Compliance team.

## More guidance

→ [Quality Policy](#)



## Driving accountability

# ACCURATE RECORDKEEPING

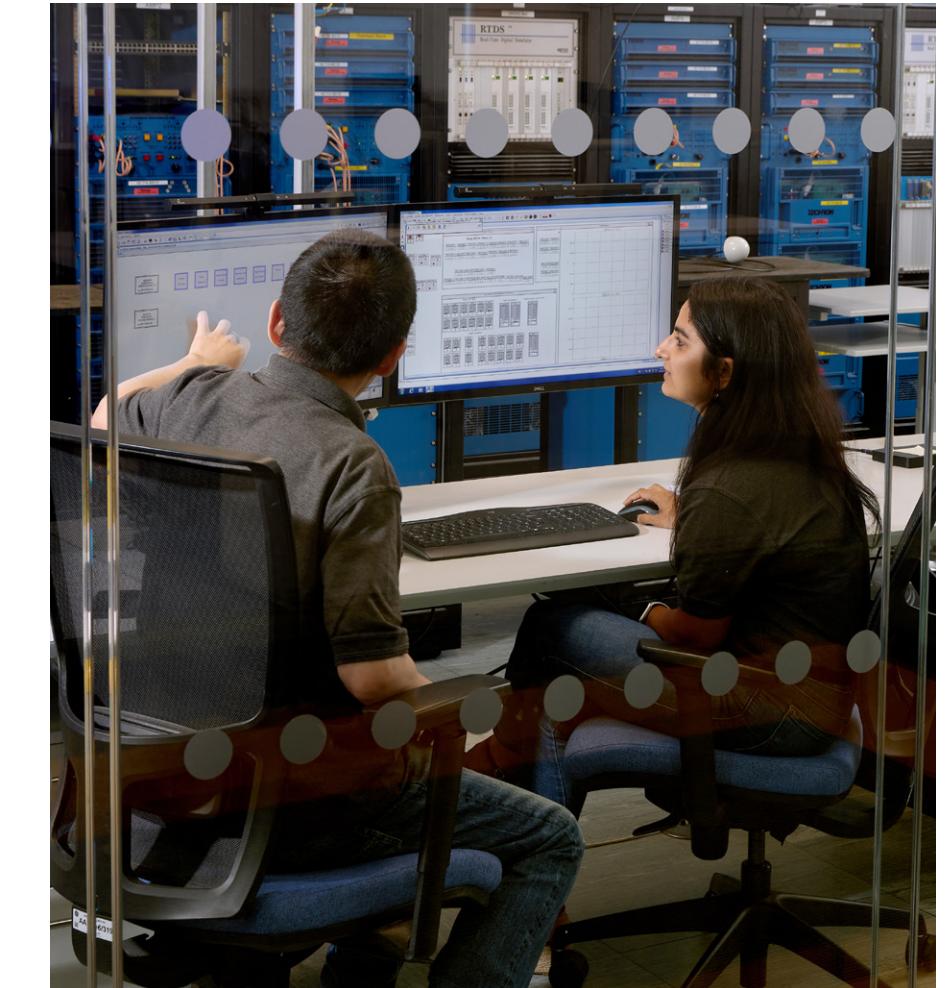
Keeping accurate financial and business records is a critical Company practice aligned to our values and legal requirements.

Recordkeeping is one of the many ways we do business with integrity. Accurate records of performance, financial statements, safety reports, quality, and the like are required to meet legal and regulatory requirements and shareholder expectations.

GE Vernova is required to create, maintain, and report accurate financial and business records. We do not falsify or mischaracterize any record, account, or transaction. Each of us – at every level of the Company – has the responsibility for ensuring the accuracy of all Company business and financial records.

### Preventing and reporting fraud

Intentionally misrepresenting or concealing facts, or helping someone else do so, is fraud. Acts such as theft, fraud, embezzlement, extortion, or misuse of company property violate the law and GE Vernova policy. Fraud undermines trust and the integrity of our financial reporting. If you see or suspect it, report it immediately to your People Leader, HR, Ethics & Compliance, or one of the Open Reporting Channels.



#### In practice

- ✓ Record transactions and events accurately and promptly
- ✓ Report or raise a concern of any financial results that do not appear to match performance
- ✓ Never make false or misleading data entries or reports
- ✓ Follow our policies and use good judgment when we incur expenses on the Company's behalf

#### More guidance

→ [Controllership Policy](#)



# PROTECTING THE COMPANY AND EACH OTHER

When we protect our Company and culture of accountability, everyone wins.

Doing the right thing for GE Vernova starts with diligently complying with all laws and regulations in every country where we do business, adhering to Company policies, and acting on our principles of integrity and accountability. Accountability is not just knowing and understanding the rules, it is also about taking the time to ensure the entire team is following them each and every day.



## Protecting the Company and each other

# INFORMATION PROTECTION

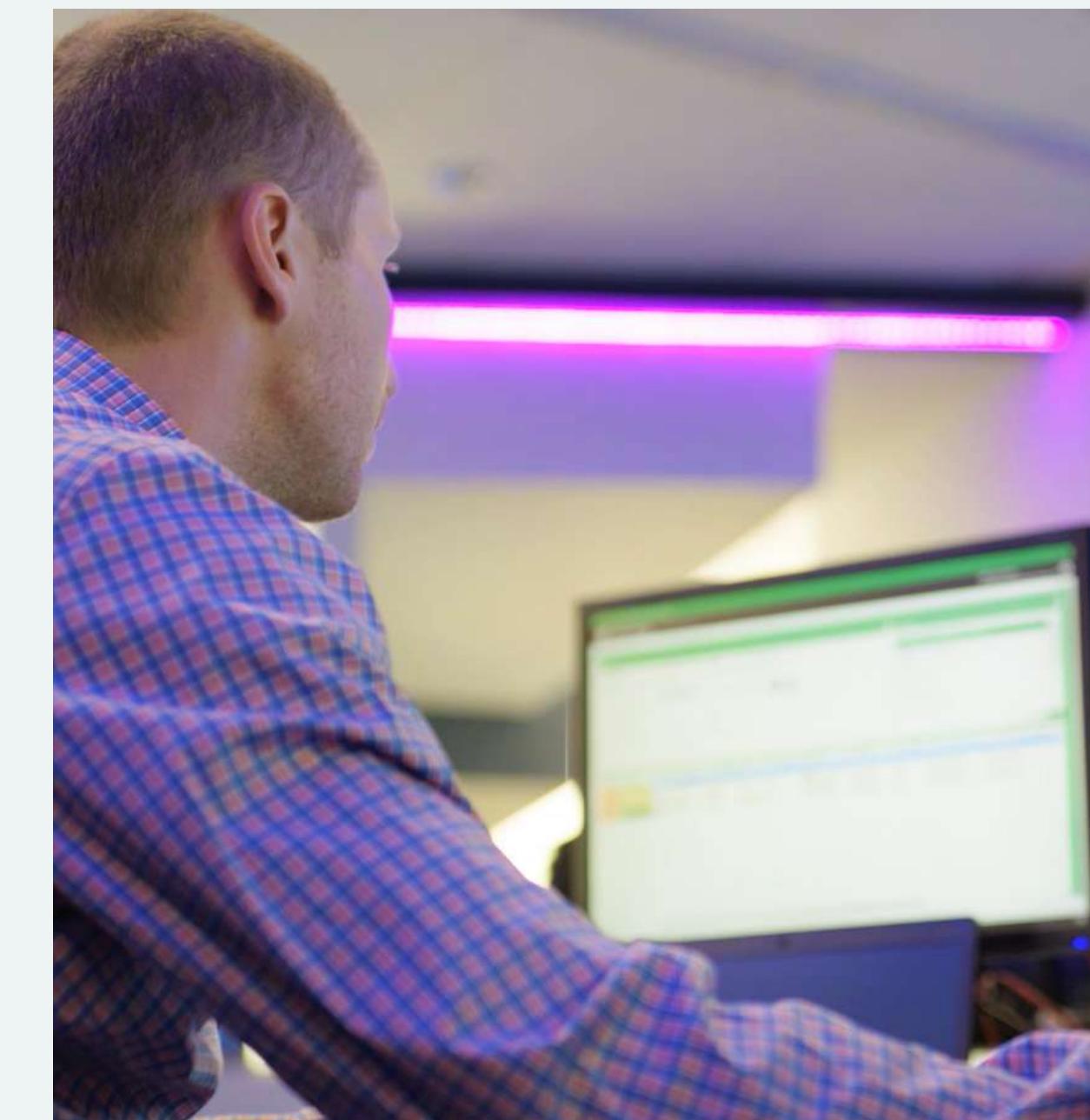
We use information about our Company, our customers, our employees, and our suppliers responsibly, and we keep it safe.

The way we handle GE Vernova Proprietary Information and data that third parties have entrusted us with is critical to building and maintaining relationships with our business partners.

This means we only use approved systems and work devices to conduct work for GE Vernova and handle confidential information, and we do not keep these devices unattended in public spaces. We also follow careful practices like keeping login credentials safe, creating robust passwords and changing them regularly, and not sharing our information resources with anyone who does not work for GE Vernova.

**Q** I'm away from my GE Vernova laptop and need to get in contact with a colleague about a project we are working on. Can I email them from my personal email account?

No. You should only use your GE Vernova email account for business-related communications with colleagues, customers, or suppliers, as well as (where you are authorized to do so) sending yourself any materials containing GE Vernova Proprietary Information. If you do not have access to your GE Vernova email, consider alternative secure options such as approved collaborations tools or waiting until you can access your company account.



### More guidance

- [Acceptable Use Policy](#)
- [Cyber Security Policy](#)
- [Proprietary Information Classification, Labeling and Handling Policy](#)
- [Commitment to the Protection of Personal Information](#)



## Protecting the Company and each other

# ARTIFICIAL INTELLIGENCE

Like all new and developing tools, AI must be used responsibly.

Artificial Intelligence (AI) holds immense potential to accelerate our mission: electrify to thrive and decarbonize. We are using publicly available tools as well as developing our own Gen AI tools for specific use cases to help enhance how we work.

We are committed to the safe, ethical, and responsible use of AI technologies. Given the rapid evolution of this field and the inherent privacy and data integrity risks associated with public AI platforms, we strictly adhere to internal policies and evolving guidelines regarding data security. We only utilize approved AI applications, and refrain from entering any confidential or proprietary GE Vernova Information, third-party data, or sensitive personal information into public AI platforms.

This disciplined approach ensures that our adoption of AI aligns with our values and also meets regulatory requirements, while safeguarding the interests of our Company, employees, and business partners.

### Appropriate use of AI tools

- ✓ Provide or summarize content that is already publicly available
- ✓ Draft templates like a thank you letter to a supplier
- ✓ Generate ideas on non-confidential topics (e.g., popular restaurants for team building activities)
- ✓ Automate repetitive tasks in spreadsheets without any sensitive or confidential information (e.g., write an Excel macro that will remove duplicates from a column of data)



I'm considering using a public AI platform to help draft a presentation summarizing recent industry trends. Can I input some company insights and data shared broadly at a recent All Employee meeting to get a more tailored output?

No. Even if the information seems non-sensitive, sharing any proprietary company insights or data with public AI platforms can expose our confidential information to external parties, which may risk competitive harm. Public AI tools should only be used with information that is already publicly available or non-confidential.



### Good to know

If you are ever unsure whether something is safe to share with an AI tool, ask your People Leader or the Cyber Security team.

### More guidance

↗ [Acceptable use of AI Policy](#)

↗ [AI Resources](#)

## Protecting the Company and each other

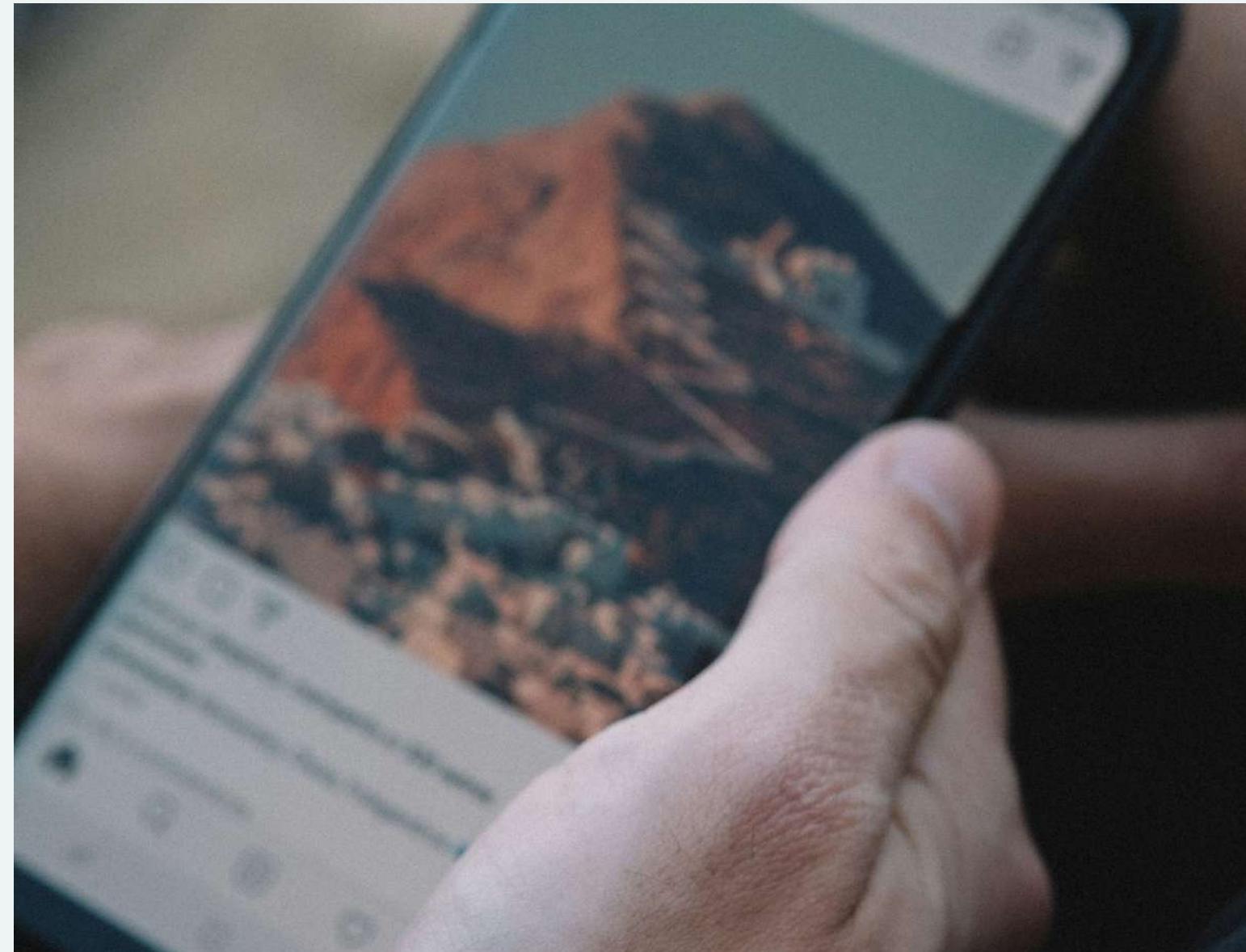
# SOCIAL MEDIA

We are always One Team, even online, and our online behavior should reflect the same professionalism, integrity, and respect that guide our workplace interactions.

Social media can help build our brand and stronger working relationships, for instance by amplifying Company achievements, highlighting partner events, or tagging teammates in group posts.

When posting on personal social media accounts, employees should remember that their public activity may be associated with GE Vernova. When an employee identifies themselves as a GE Vernova employee or can reasonably be perceived as speaking on behalf of the Company, they are acting as a spokesperson. In those cases, only content that aligns with our policies, and is suitable for the public domain, should be posted.

Employees are accountable for acting professionally and respectfully. This includes protecting GE Vernova confidential and proprietary information in any post across all social platforms.



### More guidance

→ [Acceptable Use Policy](#)

→ [Respectful Workplace Policy](#)



## Protecting the Company and each other

# CYBERSECURITY

We safeguard our systems, networks, and devices to protect our operations, data, and each other.

Cybersecurity plays a vital role in enhancing digital solutions across our product portfolio, as well as in our own operations.

We are all responsible for protecting GE Vernova's systems, networks, and devices against cyber threats like hacking, phishing, ransom demands, and other attacks.



### In practice

GE Vernova systems and devices are intended for business purposes only, so we keep the following in mind:

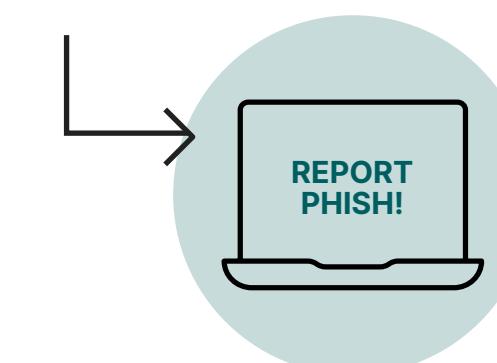
- Only trusted applications should be installed on GE Vernova systems and devices
- Links and attachments in emails need to be checked carefully before clicking on them

- Personal email or unapproved devices should not be used
- GE Vernova information should be shared on secure, approved channels only

**Q** I got an email regarding a system upgrade and it requires me to confirm my login credentials by clicking a link and providing them. How can I tell if this is a safe request?

This is a common phishing tactic. If something feels urgent, threatening, or unusual – especially when it involves sharing your credentials – it is worth verifying through a trusted channel first.

Never click on links or open attachments from unexpected or suspicious emails, even if they appear to come from within the Company. Instead, report the message by clicking the "Report Phish" button on your Outlook email.



### More guidance

- [Cyber Security Policy](#)
- [Cyber Security Portal](#)

## Protecting the Company and each other

# PRIVACY

We value the trust others place in us by respecting their personal information.

Respecting privacy is part of maintaining the trust that we and our customers put in GE Vernova.

We comply with privacy laws and GE Vernova's Commitment to the Protection of Personal Information. We also expect our business partners to adhere to privacy and data protection laws and regulations. Personal information should only be accessed if it is essential for our role, retained only for as long as needed, and then securely deleted.

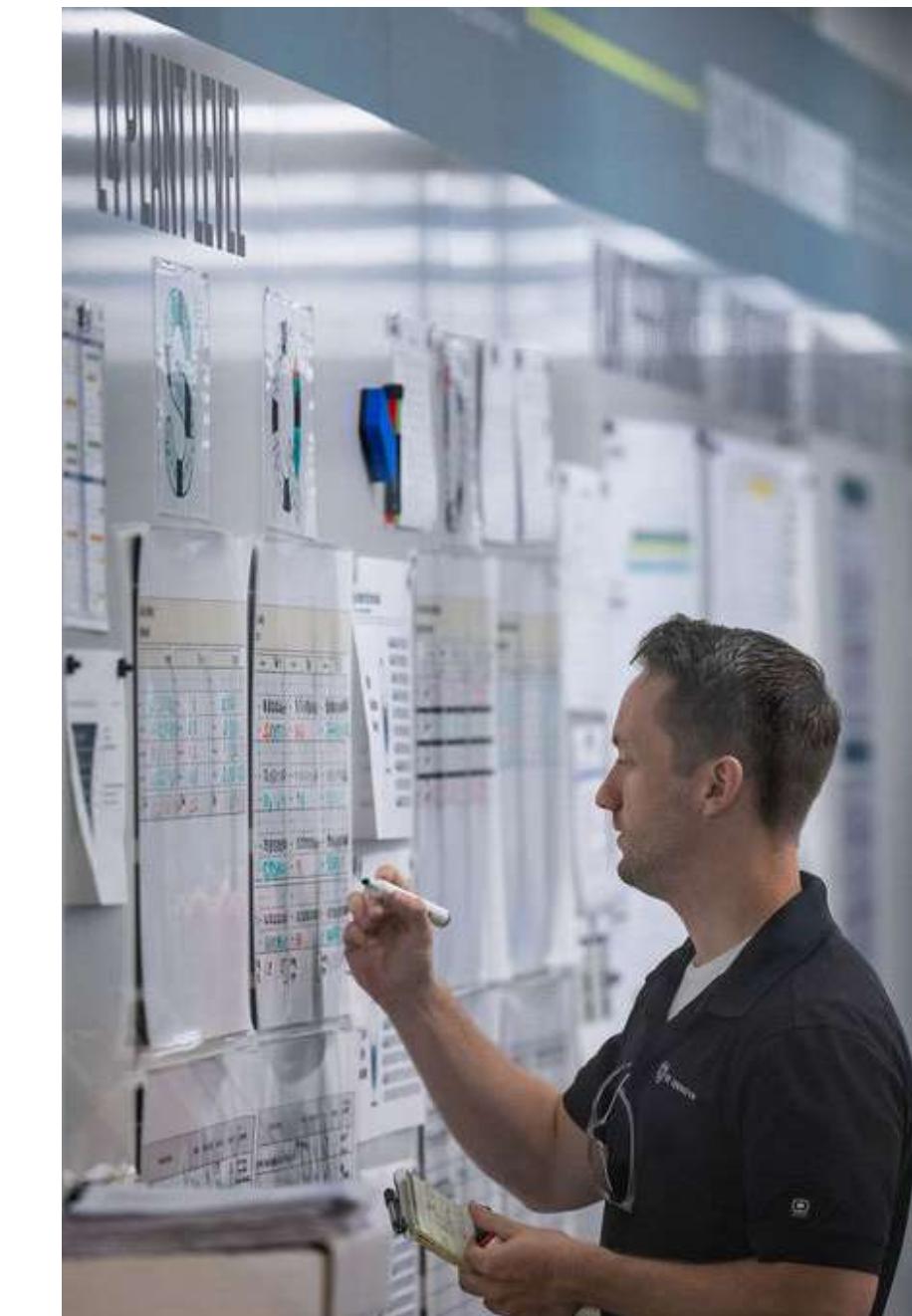
If you encounter any risks or incidents involving personal information, you must report them without delay. Reports can be made through a Privacy Report, to your People Leader, your Business Privacy Leader, or via any Open Reporting Channels.

Protecting personal information is a shared responsibility for all of our employees. By following these principles, we help maintain trust, safeguard individuals' rights, and uphold the integrity of our operations.

**Q**

I was helping with a project and saw that I still have access to a folder with employee compensation data from a previous role. I'm not using it now, but I thought it might be useful for future analysis. Is it okay to keep a copy just in case?

Personal information should only be accessed, used, or shared when there is a clear, legitimate business need. Holding onto that data violates the Company's privacy standards and may breach legal requirements. If you no longer need access, notify your People Leader or the appropriate data owner so your access can be removed.



**What is personal information?**

It is any data that can identify an individual, including names, employee IDs, home addresses, or compensation details.

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**More guidance**

⇒ [Privacy Policy](#)



## Protecting the Company and each other

# INTELLECTUAL PROPERTY

Protecting our innovations and brand helps us maintain our competitive advantage.

We employ talented people around the world across diverse roles, including engineering, manufacturing, research, operations, business, and more.

Together, we create products and services that give us a competitive advantage, which we secure through intellectual property (IP) rights.

GE Vernova's IP forms the foundation of what we design, make, and use. Harnessing the energy to change the world means investing in and protecting our IP. Our engineering and other documents need to be properly classified, labeled, and handled. And if we develop anything novel, new, or useful for GE Vernova, we timely notify Legal so that we protect it with appropriate IP rights.

Beyond our technology, GE Vernova's IP includes our brand, GE Vernova name and logo, and other trademarks and logos that we use to uniquely identify our goods and services to the world. Properly using and protecting those brands in our communications and marketing helps reinforce our position and reputation in the industry.

We also respect the valid IP rights of others and take steps to avoid infringement. This includes, for example, ensuring that we do not bring information from former employers to our work at GE Vernova.



### What are examples of IP?

IP includes innovations, inventions, manufacturing processes, our brands, business plans, marketing materials, software, graphics, proprietary photography, product specifications, supplier footprints, and customer purchasing histories – all of which are protected through patents, trade secrets, trademarks, copyrights, and designs. IP developed while employed by GE Vernova is the property of the Company.

### More guidance

→ [Intellectual Property Policy](#)

→ [GE Vernova Proprietary Information Classification, Labeling and Handling Policy](#)



## Protecting the Company and each other

# ANTI-MONEY LAUNDERING

We are committed to conducting our business legitimately, and expect the same from our customers and suppliers.

We will not knowingly engage with any parties currently or previously involved in criminal activities or unethical business practices. We conduct thorough due diligence, and we only accept funding that is lawful and aligned with our standards. Strict adherence to these standards helps protect our Company from financial crime, supports global anti-money laundering (AML) and anti-corruption efforts, and reinforces the trust placed in GE Vernova by our stakeholders.

### In practice

Concerns that should be raised:

- ⌚ Attempts by a customer to provide false information when establishing a business relationship
- ⌚ Cash payments or overpayments, which may be accompanied by requests for refunds
- ⌚ Third-party payments, e.g., payments made by parties other than the bill-to customer

- ⌚ Unusual orders or transactions inconsistent with a customer's expected behavior
- ⌚ Unusually complex deal structures or funds sent to or received from jurisdictions unrelated to a transaction

### More guidance

↗ [Anti-Money Laundering Policy](#)



## Protecting the Company and each other

# INSIDER TRADING

### We do not use or disclose insider information.

Access to inside information carries responsibility. If you have access to material non-public information (MNPI), you must protect it and never share it or use it to buy or sell securities – whether it is stock in GE Vernova or in a company with which we do business.

Compliance with laws regarding insider trading and stock tipping supports investor confidence and reflects GE Vernova's dedication to transparency and accountability. Protecting this information is critical to maintaining credibility with stakeholders and complying with regulatory expectations.

GE Vernova does not tolerate any misuse of MNPI for personal or financial gain. We also do not share MNPI with others, even friends or family, as this could enable them to trade illegally. Doing so undermines trust, violates the law, and goes against our commitment to ethical business conduct.



### What is MNPI?

MNPI is any information that a reasonable investor would consider important when deciding whether to buy, sell, or hold securities, which have not been made public. Examples could include financial results, planned mergers or acquisitions, leadership changes, new product launches, or significant contract wins or losses.

**Insider trading** means buying or selling stock or other securities of any company when you are in possession of MNPI about the company

**Stock tipping** means sharing MNPI about a company with a person who then buys or sells stock or other securities of the company



**Over dinner, I told my sister that our company just signed a major contract with a new customer that has not been announced yet. I learned that she purchased stock shortly after our conversation. Is this a problem?**

Yes. Sharing MNPI – like an unannounced contract – violates both company policy and insider trading laws. Even if you did not explicitly advise her to trade or seek personal gain, this “tipping” can lead to serious legal and disciplinary consequences for both you and your sister. Always keep confidential business information private until it has been officially disclosed to the public.

### More guidance

→ [Insider Trading and Stock Tipping Policy](#)



# RESOURCES

Whether you want to raise a concern or ask a question, we are here to listen.

## Raise a concern:

- [Online](#)
- [Call our hotline](#)
- [Email](#)

## Or you can contact:

- Your Ombudsperson
- People Leader
- Ethics & Compliance
- Legal
- Human Resources



## You can also visit our Integrity Portal [\*\*integrity.gevernova.com\*\*](http://integrity.gevernova.com) to:

- Find a Business Compliance Leader
- Raise a concern
- Review policies
- Access training resources, videos, and infographics





GE VERNONA