LUMA VENDOR CODE OF CONDUCT:
Sharing Our Values

Table of Contents

MESSAGE FROM Dave Holman *3*

OUR MISSION STATEMENT & VALUES *4*

Mission Statement 4

Core Values 4

CONDUCTING BUSINESS THE LUMA WAY *5*

Our Expectations 5

Vendor Selection 5

Speak Up 5

Investigation of Reports 6

Violations of Our Code 6

CREATING A CULTURE OF TRUST AND RESPECT *6*

Discrimination, Harassment, and Forced Labor 6

Workplace Safety 6

Social Media 7

Conflicts of Interest 7

ACTING WITH INTEGRITY *8*

LUMA's Code of Conduct for Employees 8

Zero Tolerance for Corruption 8

Exchanging Business Courtesies 8

Relationships with Governmental Authorities 9

Trade Controls 9

SUPPORTING OUR COMMUNITIES *9*

Environment and Sustainability 9

PROTECTING OUR COMPANY RESOURCES *10*

Company Assets 10

Data Protection 10

Confidential Information 11

Data Privacy 11

Record Retention 11

Financial Reporting 11

MESSAGE FROM Darren B. Miller

LUMA was created to power the lives of the people of Puerto Rico through the delivery of safe, reliable, and affordable electricity. Operating safely and sustainably and in an ethical and responsible manner is critical to achieving our goals.

Our vendors play an important role in supporting our operations and upholding our commitments to our customers. Our Vendor Code of Conduct explains the principles and standards that apply to you when you are providing goods and services to LUMA. As a LUMA vendor, we expect you to share the principles described in this Code of Conduct and to apply similar standards with your own employees and across your supply chain.

By following this Code, you are upholding our mission and our core values and setting the groundwork for our joint success. We expect you—including your employees and the suppliers you yourself use—to act ethically and abide by the commitments in this Code and by other policies that may apply you as you interact with us or act on our behalf. We value our relationship with you and appreciate your efforts to fulfill these important responsibilities.

Sincerely,

Darren B. Miller
Chief Financial Officer

OUR MISSION STATEMENT & VALUES

Our values are not just words on a page. We live them daily. Our mission is always, in every way, to continue getting better.

Mission Statement

LUMA was purposefully built for the people of Puerto Rico, to reinvigorate and transform the island's electric transmission and distribution system and to support its overall economic development. We put people first – our employees, customers and communities.

We encourage and inspire our people to embrace progress, drive growth and create innovative solutions for our customers and the world around us.

We stand together, building a culture on continuous improvement with the goal of working towards a stronger Puerto Rico by delivering on our promise of excellent customer service and our commitment to Safety.

Core Values

Our Core Values define how we work and we seek out business partners who share them as well. It is important that all members of our team embrace these values, as they are fundamental to how we do business.

We live by the following values:

I. CARE
We seek to understand and collaborate. We care enough to challenge each other. We care about each other – and the communities where we live and work.

II. ACCOUNTABILITY
We are transparent, respectful and responsive. We are ethical and guided by integrity. We do the right thing. We hold ourselves and each other accountable to operational excellence.

III. PRIDE
We take pride in holding ourselves to the highest standards of safety and sustainability. We are invested in our people, our actions and our commitments for the long run. We celebrate our successes and continuously strive to be better.

CONDUCTING BUSINESS THE LUMA WAY

Our Expectations

LUMA's Vendor Code of Conduct ("Code") applies to all intermediaries, suppliers, consultants, contractors, contract labor and other business partners who provide goods or services to or on behalf of LUMA (collectively, "vendors"). We each play a role in upholding the principles of our Code. You are expected to ensure that all your employees or sub-vendors that perform work for LUMA read, understand and follow the Code and the underlying policies and practices that are applicable to them to avoid illegal or unethical conduct. Compliance with this Code is a requirement for becoming and remaining a LUMA vendor.

Vendor Selection

We are committed to dealing fairly with all vendors throughout our procurement process, from bid evaluation and negotiation to award decisions and purchasing administration. We select our vendors based on objective criteria, such as technical, commercial or other legitimate business reasons. You are expected to cooperate with our procurement processes, including responding to any due diligence requests.

Speak Up

Raising awareness of possible misconduct or violations of the law or the Code is part of our commitment to creating a fair and honest culture. To ensure the highest levels of integrity throughout our supply chain, we rely on our vendors to speak up about any actual or suspected violations of the law or our Code.

If you want to come forward with any questions or concerns, you may use any of the following resources:

Your LUMA Supply Chain Representative LUMA Leadership LUMA's Director of Compliance LUMA's Ethics Helpline

LUMA's Ethics Helpline is available 24 hours a day, seven days a week, in Spanish and English. You can call the Ethics Helpline at 877-776-0993 and speak with a third-party representative, make a report via the internet at www.LUMAethicshelpline.com, or e-mail Compliance@LUMAmc.com.

LUMA's Ethics Helpline is managed by an independent third-party service provider. You may report anonymously. All reports made to the Ethics Helpline are forwarded to LUMA's Director of Compliance for review and investigation. When you make a report to the Ethics Helpline, please provide as much information as possible. The more information you provide, the easier it will be for the Company to investigate and address your concern.

Investigation of Reports

You are encouraged to report conduct that you believe is illegal or improper. LUMA treats all reports of misconduct confidentially, to the extent practical and legally permissible. We will promptly investigate all reports and take necessary action. You are expected to cooperate with any investigations. LUMA does not tolerate any form of retaliation against anyone who reports a violation of this Code in good faith or cooperates with an investigation. We also expect all our vendors to investigate any concerns that are reported to them and to take corrective measures if necessary.

Violations of Our Code

LUMA takes violations of our Code very seriously. We encourage our vendors to monitor their compliance with the Code's requirements. LUMA will monitor our vendors' compliance with this Code through audits or site visits as we deem necessary and we expect our vendors to cooperate with related requests. If any non-compliance with this Code is detected, you are expected to take reasonable steps to address, remedy, and prevent reoccurrence of the non-compliant conduct. Failure to comply with this Code may result in the termination of the business relationship between you and LUMA.

CREATING A CULTURE OF TRUST AND RESPECT

We believe in *People First, Safety Always*.

Human Rights and Labor Practices

We respect and promote human rights in all our operations. We expect you to share our commitment to providing equal employment opportunity and creating an inclusive work environment that is free from discrimination. You must treat all members of your workforce fairly and in accordance with all applicable labor and employment laws.

We expect you to employ workers on the basis of their ability to do the job, and not on the basis of their race, color, age, sex, national origin/ancestry, social origin or status, marital or familial status, citizenship status, disability, religion, veteran status, sexual orientation, gender identity, political affiliation, genetic information, being a victim or being perceived as a victim of domestic violence, sexual assault or stalking, or any other status protected by federal, state, or local law.

LUMA will not tolerate any conduct by a vendor that is offensive, hostile, abusive, exploitative or otherwise inconsistent with a respectful workplace. You must not support or engage in forced or indentured labor, human trafficking, violence or intimidation of any kind. You must compensate workers in compliance with any legal requirements for wage, working hours, overtime, and benefits. We expect you to respect the rights of your workers to associate freely and to join or not join labor unions.

Workplace Safety

At LUMA, the safety of our people – employees, customers, vendors, and the public – matters first and foremost. As our vendor, you must comply with all applicable safety and security laws

and regulations. You also must adhere to LUMA's safety standards and apply safe work practices to work you undertake on our behalf to prevent injuries and illnesses and minimize property losses. You must comply with LUMA HSE Contractor Selection and Management Standard applicable requirements. You are expected to report any incidents or near-misses in accordance with LUMA's HSE Handbook and our Workplace Safety Policy. You must ensure that your workers receive relevant training on health and safety procedures, including prohibitions on the use of illegal drugs and alcohol at work and restrictions on the possession of weapons.

Social Media

You must not use social media in a way that may jeopardize LUMA's reputation. You are not allowed to make any statements on behalf of LUMA without prior permission from the Company's Communications department. You are also not permitted to use LUMA's name or logo, trademarks or other intellectual property without the Company's express consent. You must never use social media to make false or defamatory comments about LUMA or its employees, customers, other vendors, or any other Company stakeholders.

Conflicts of Interest

When working for LUMA, you have a responsibility to always act in the best interests of the Company. You must avoid engaging in any activity that would create an actual or apparent conflict of interest in the provision of products or services to LUMA. A conflict of interest may arise when your personal or professional relationships influence or appear to influence your business decisions related to the work you do for the Company.

Examples of a conflict of interest include:

- Your company is partially or fully owned or controlled by a current LUMA employee or someone who has a personal relationship with a LUMA employee
- Your company is partially or fully owned or controlled by a government employee of any agency that regulates or oversees LUMA
- You hire or employ a current LUMA employee or their family member
- You have a personal relationship with the LUMA employee who supervises your work for the Company

Additionally, we are obligated to comply with the Código de Ética para Contratistas, Suplidores, y Solicitantes de Incentivos Económicos del Gobierno de Puerto Rico (the "Code of Ethics"), which enumerates our ethical obligations and responsibilities and includes specific requirements related to identifying, avoiding and mitigating conflicts of interest.

Even the appearance of impropriety can undermine our credibility, pose financial and reputational risk to us and jeopardize our ability to comply with relevant laws and regulations, or our contractual obligations. If you are aware of any situation that may create a conflict of interest you must promptly disclose it to the Company.

ACTING WITH INTEGRITY

We conduct our business lawfully and ethically.

LUMA's Code of Conduct for Employees

All LUMA employees are required to comply with LUMA's Code of Conduct for employees, available at https://lumapr.com/. Among other things, LUMA's employee Code has strict rules and expectations for our employees when they interact with LUMA's vendors. You must never cause or take any action that would result in a LUMA employee violating the employee Code. When in doubt, ask your LUMA business contact.

Zero Tolerance for Corruption

LUMA is committed to conducting business the right way. We never tolerate any form of corruption and we expect our vendors to carry out their business honestly and ethically. You must operate in full compliance with applicable laws and regulations, including anti-money laundering, anti-bribery and anti-corruption laws, wherever you do business.

When working for or on behalf of LUMA, you must never offer, promise or give a bribe, kickback or improper payment to anyone, whether they are a government official, commercial actor or private individual.

A bribe is an offer or gift of anything of value in order to improperly influence a decision or gain an unfair business advantage. Bribes may include money, expensive gifts, extravagant travel or entertainment, employment opportunities, and political or charitable donations. A kickback is money or a gift of anything of value returned or paid as a reward for awarding or fostering business.

We expect you to implement your own anti-corruption policies and procedures, which include conducting appropriate due diligence for any sub-vendors that will perform work for LUMA and maintaining accurate books and records.

Exchanging Business Courtesies

In the course of conducting business for LUMA, you may exchange business courtesies to build goodwill and positive working relationships at the Company. However, such exchanges must not be used to improperly influence a business decision or create a sense of obligation. Although nominal promotional items or business courtesies of modest value may be acceptable in certain situations, they are never required to do business with LUMA.

Even the appearance of impropriety can damage your and LUMA's reputations. Any business gifts or entertainment you give or offer to LUMA employees must be reasonable and comply with local law and the LUMA employee Code. Such courtesies must not be provided frequently. Extravagant gifts and entertainment, cash, cash equivalents, gift cards or discounts not available to all employees are prohibited, whether they are provided directly to LUMA employees or indirectly via third parties or family members.

Relationships with Governmental Authorities

LUMA often interacts with Puerto Rico's regulatory and other governmental authorities that are responsible for laws, regulations, and policies that affect the Company, such as:

- The Puerto Rico Public-Private Partnerships Authority ("P3 Authority")
- The Puerto Rico Electric Power Authority ("PREPA")
- The Puerto Rico Energy Bureau ("PREB")
- The Financial Oversight and Management Board for Puerto Rico ("FOMB")
- The Federal Emergency Management Agency ("FEMA")

In your work with LUMA, you may encounter government officials or employees from these or other government agencies and departments. You must act with integrity when interacting with such governmental authorities and ensure that you comply with all applicable legal requirements. You must not make representations on behalf of LUMA without prior approval from the Company.

Providing a business courtesy to a government official or employee is subject to strict rules, including the Code of Ethics. You shall not provide any business courtesies to any government officials or make any donations or contributions to any political party or candidate or for any political initiative on LUMA's behalf without prior approval from the Company.

Trade Controls

LUMA complies with all applicable laws and regulations that govern international trade, including import and export controls and economic sanctions promulgated by the U.S. Treasury Department, Office of Foreign Assets Control. We expect our vendors to be knowledgeable of and abide by these laws when applicable. You must not engage in transactions with any sanctioned parties or facilitate transactions with third parties that involve sanctioned parties.

SUPPORTING OUR COMMUNITIES

We invest in our local communities and provide the best service to our customers.

Environment and Sustainability

LUMA recognizes the importance of safeguarding the environment for future generations. We are committed to reducing our environmental impact and we actively seek vendors that operate in an environmentally responsible manner. Because we care about protecting the environment, we expect our suppliers to:

- Commit to and promote environmental compliance.
- Comply with local, Commonwealth and federal environmental laws, regulations and government orders, permits, authorizations and other legal obligations.
- Assist in finding efficient and effective solutions to environmental issues.
- Report environmental incidents in accordance with policies.

- Respond quickly and effectively to environmental incidents involving work sites and/or equipment in accordance with LUMA's policies.
- Be familiar with and comply with all LUMA environmental systems, procedures, plans and programs in effect and applicable to their work situation.
- Implement systems and procedures to minimize activities that pose a threat to the environment and provide training on the same.
- Ensure safe and appropriate management and disposal of waste.

Local Goods and Services

LUMA is committed to investing in the people of Puerto Rico. We support local businesses and provide them with fair opportunities to bid and acquire contracts. We expect our vendors to share this commitment to seek, use and develop a local supply chain while performing work for LUMA.

PROTECTING OUR COMPANY RESOURCES

We use assets, systems, processes and data responsibly.

Asset Management

Responsible management of assets that are owned by LUMA as well as assets that are entrusted to us by PREPA is vital to the performance of our work. Such assets include equipment, tools, vehicles, offices and yards, funds, documents, networks, systems and software, confidential information, sensitive information and intellectual property. As a LUMA vendor, your services may affect electric utility service and be subject to utility regulation, including oversight from the P3 Authority and the PREB. You are expected to safeguard the assets managed by LUMA and only use them with Company approval and for legitimate business purposes; they should be protected from misuse or theft.

Data Protection

Information systems managed by LUMA, and the data we store on these systems, are valuable assets, many of which are used to carry out critical utility activities. You have a duty to maintain the security and integrity of these systems and to abide by all information protection and privacy laws that apply to your relationship with us.

If you provide information systems services to LUMA, or you connect to information systems managed by LUMA, you will be expected to implement and maintain a cybersecurity system designed to prevent unauthorized access to these systems, as well as your own. In such cases, LUMA has the right to screen your systems for compliance and security purposes prior to engagement. You must notify LUMA immediately if any information we provided or gave you access to has been, or is suspected of being, lost, stolen, or inappropriately disclosed.

All information that is created, stored and transferred using systems and networks managed by LUMA is Company or PREPA property . LUMA may authorize individuals to monitor equipment, systems and network traffic to ensure that these systems have not been compromised or to see

if there has been improper or inappropriate use of Company or PREPA resources. You should not expect privacy when using LUMA's systems to access, download or transmit information.

Confidential Information

In the course of your work for LUMA, you may have access to the Company's or PREPA's confidential, non-public information. This can include financial information, business or strategic plans, customer lists, terms or rates offered to customers, pricing and technological innovations. You must protect the confidentiality of this information and you must not disclose it to anyone outside the Company unless the Company authorizes you to do so or it is required by law.

Sometimes our customers or other vendors will provide us with their own confidential information, in furtherance of our business relationships with them. You must always respect and protect the confidential information of our customers and other vendors and abide by any confidentiality obligations to which you have agreed. Any media inquiries related to confidential, non-public information about LUMA or its operations should be referred to the Company's Communications Department.

Data Privacy

We respect the privacy of the personal information of our employees, customers, and vendors. You have a shared responsibility to protect this information against inadvertent or inappropriate disclosure. You must handle such information in compliance with applicable laws and LUMA's policies and IT security requirements. LUMA reserves the right to analyze your security system to ensure that any personal information we disclose to you will be adequately protected. You must not share such information with third parties without LUMA's express approval. Any potential compromise to the confidentiality or the security of personal information should be immediately reported to LUMA's IT—OT Department.

Record Retention

We maintain Company records, in paper and electronic form, for as long as required by law and as necessary for our business purposes. During the course of your work for LUMA, you may generate or receive information or records related to the Company. You must follow all applicable laws and contractual requirements in creating, maintaining and disposing of these records. The destruction of personal information must be previously authorized to implement any necessary safeguards and must be documented in compliance with law.

You must not destroy or discard any records related to your work for LUMA that are subject to an internal or government investigation, or to any other legal or administrative proceeding. If you receive a subpoena or a request from someone outside LUMA for a document or record, notify your contact at LUMA.

Financial Reporting

Accurate, reliable, and timely records and disclosures are critical to meeting LUMA's financial, legal and management obligations. Records prepared for LUMA, including records of work time

and expenses, must be accurate and complete. You must ensure that you have appropriate authorization for each work order or purchase requisition and that you maintain appropriate supporting documentation. You must comply with generally accepted accounting principles, as well as your internal accounting policies and system of internal controls.