July 23, 2021

To: Puerto Rico Public-Private Partnerships Authority
Roberto Sanchez Vilella (Minillas) Government Center
De Diego Ave. Stop 22,
San Juan, PR 00907

RE: RFI 0007 – Written Standards of Code of Conduct

In response to the Puerto Rico Public-Private Partnerships Authority ("P3A") request for information dated July 9, 2021, and as part of Transmission and Distribution Operating and Maintenance Agreement ("T&D OMA") executed on June 22, 2020 among the Puerto Rico Electric Power Authority ("PREPA"), the P3A and LUMA Energy, LLC and LUMA energy ServCo, LLC (collectively, "LUMA"), LUMA provides the following information.

1. LUMA's Vendor Code of Conduct – *Please refer to Exhibit 1*

2. LUMA's Anti-Corruption Policy – *Please refer to Exhibit 2*

3. LUMA's Conflict of Interest Policy – *Please refer to Exhibit 3*

4. LUMA's Procurement & Contracting Practice – *Please see Section 4.1 of the approved Consolidated Procurement Manual. Please refer to Exhibit 4*

5. Written standards of conduct covering conflict of interests and governing the actions of employees, officers, or agents of LUMA engaged in the selection, award, and administration of Contracts – *Please refer to Exhibit 5, specifically page 11 and 13 and Exhibit 1*

6. Written standards of conduct covering organizational conflicts of interest – *As the Consolidated Procurement Manual was approved on May 31, 2021 and commencement occurred on June 1, 2021, LUMA continues to develop written documentation. LUMA is basing the development of documentation on Principles included herein. Please refer to Exhibit 6*

7. Written standards of conduct covering conflicts of interest and governing the actions of Vendors and contracting parties – *Please refer to Exhibit 1*

LUMA

With respect to P3A's requests numbered 9 and 10, LUMA cannot act or speak of its owners. Information on subsidiaries of publicly traded companies in the United States and Canada is typically disclosed in annual reports. Quanta Services, Inc.'s latest 10-K is available at https://investors.quantaservices.com/sec-filings/annual-reports/. Canadian Utilities Limited's latest annual information form is available at https://www.canadianutilities.com/en-ca/investors/documents-filings.html.

Sincerely,

LUMA Energy LLC

Mario Hurtado
Chief Regulatory Officer