

XPLR INFRASTRUCTURE, LP

CODE OF BUSINESS CONDUCT & ETHICS

XPLR Infrastructure, LP (“XPLR”) is a Delaware limited partnership, whose general partner is XPLR Infrastructure GP, Inc. (“XPLR GP”), and an indirect, majority-owned subsidiary of NextEra Energy, Inc. (“NextEra Energy”). XPLR accordingly has adopted the NextEra Energy Code of Business Conduct & Ethics (the “Code”), attached hereto, as its own Code of Business Conduct & Ethics. The Code applies to all employees, officers and directors of XPLR GP, XPLR and XPLR’s subsidiaries.

In reviewing the Code, please note the following:

1. References to “NextEra Energy” or the “Company” include XPLR and XPLR GP.
2. The policies of NextEra Energy referred to in the Code should also be considered to be the policies of, and are applicable to, XPLR and XPLR GP.
3. Questions about the Code may be addressed to the NextEra Energy personnel listed in the Code.
4. Reporting known or suspected misconduct¹ involving XPLR or XPLR GP, including concerns involving internal controls and financial reporting, may be directed to the channels set forth in the Code under “Personal Commitment” and the Reporting Concerns policy referenced therein.
5. References to shareholders include holders of XPLR common units.
6. XPLR’s common units are publicly traded securities and the Code section entitled “We Observe Securities Laws,” including the example given in that section, applies with respect to XPLR’s common units, any trading in XPLR common units and non-public information about XPLR’s business and operations.
7. Certain transactions between XPLR and NextEra Energy can appear to present conflicts of interest. Questions concerning any contract or transaction between XPLR and NextEra Energy should be addressed to the NextEra Energy personnel listed in the Code or to the Board of Directors of XPLR.
8. Any waiver of this code must be approved by the Board of Directors of XPLR and will be disclosed to XPLR unitholders in accordance with New York Stock Exchange rules.

Adopted: July 1, 2014

Last revised: February 18, 2025

¹ Known or suspected misconduct includes, among other matters, fraud, forgery, embezzlement, bribery, kickbacks, bid rigging, alterations of company records, Code violations or deliberate attempts to circumvent XPLR control procedures



**CODE OF
BUSINESS
CONDUCT
AND
ETHICS**

Letter from Our Chairman, President and Chief Executive Officer



Dear Colleague:

At NextEra Energy, our greatest asset is our team, which I firmly believe is the best in our industry. Being the best comes with a lot of responsibilities, and some of the most important of those responsibilities are summarized in this document: our Code of Business Conduct and Ethics.

Our Code is a manual for how to successfully conduct business ethically and with integrity at NextEra Energy. Our “passion to be the best” shines throughout the Code’s substance, but also in how it is organized – making it easy to use and understand.

So how is our Code organized?

Our Code is organized to deepen everyone’s commitment to NextEra Energy’s three corporate values, so each subject in the Code corresponds to one of those values:

- » We are committed to excellence.
- » We do the right thing.
- » We treat people with respect.

The Code breaks down what it means to conduct business with integrity, using learning aids such as real-life scenarios, Q&As, and “DOs” along with “DON’Ts.” We also have included links to corporate policies and procedures that supplement each section of the Code in order to make the Code as practical as possible.

What should each of us do with our Code?

Read it. Digest it. Follow it. If you have questions, make it your responsibility to reach out to your supervisor or any compliance officer listed in the Code.

Should you witness a violation – of this Code, any company policy or the law – know that you are obligated to report it. But also know that we will always have your back. The company has a responsibility to protect you from any retaliation for reporting a suspected violation, in good faith, and we will honor that responsibility to you. In the spirit of continuous improvement, we also welcome any feedback on how we can make our Code easier to use and understand.

Part of what makes our team the best is our commitment to flawless execution in everything we do. By working together to follow the Code – and never losing focus on our commitment to customers and to each other – we will continue to build the best electric utility company in the world.

Thank you for doing your part to live up to all our commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Ketchum". The signature is fluid and cursive, with a long horizontal line extending to the right.

John Ketchum
Chairman, President and CEO

Table of Contents

Letter From Our Chairman, President and Chief Executive Officer	2	We Do the Right Thing	19
NextEra Energy Core Values	4	We Protect the Environment	19
Introduction: Doing Well by Doing Good	5	We Avoid Conflict of Interest Situations	20
The Purpose of Our Code	5	Personal Relationships	21
Who is Expected to Follow Our Code	5	Competing Against NextEra Energy	21
Where is Our Code Applicable	6	Holding Significant Outside	
Ethical Responsibilities	6	Financial Interests	23
Personal Commitment	7	Disclosing Conflicts	23
Non-Retaliation Commitment	8	We Exchange Business Courtesies	
Investigations and Consequences	8	Ethically	24
Investigation Process	9	We Do Not Resort to Corruption or	
Legal Responsibilities	9	Bribery	25
We Are Committed to Excellence	10	We Comply with International Trade Laws	27
Federal Energy Regulatory		We Give Back to Our Communities	28
Commission (FERC)	10	Political Participation Process	28
Florida Public Service Commission (FPSC)	10	Non-Solicitation	29
FERC Standards Of Conduct	10	We Communicate Truthfully with the	
FERC Affiliate Restrictions	10	Public	30
FERC Cross-Subsidization Rules	10	Social Media	30
North American Electric Reliability		We Treat People With Respect	32
Corporation (NERC) Reliability Standards	11	We Value Our Fellow Employees	32
State Compliance Codes of Conduct	11	Discrimination and Harassment	32
We Maintain Accurate Records	11	Human Rights	34
Records Retention	12	Providing a Safe and Secure Workplace	34
Internal and External Audits	12	We Compete with Integrity	36
Government Investigations and		We Treat Our Customers and	
Other Inquiries	12	Suppliers Fairly	37
We Observe Securities Law	12	We Protect Our Third Parties'	
We Safeguard Company Assets		Information and Property	37
and Information	14	Waivers	38
Confidential and Proprietary Information	15		
Intellectual Property	17		
We Use Company Technologies			
Responsibly	17		
Cybersecurity	18		



NextEra Energy Core Values

Our Values

We Are Committed to Excellence

By establishing high standards of quality, driving continuous improvement, making fact-based decisions, working safely and holding ourselves accountable, we cultivate the expertise and passion to deliver the best for our shareholders, customers, employees and other stakeholders.

We Do the Right Thing

By acting with integrity and humility in everything we do, living up to our commitments and being forthright and honest in our communications, we create an environment of openness and trust.

We Treat People With Respect

By leading respectfully, promoting teamwork, building a diverse and inclusive team and investing in development, we strengthen and engage our greatest asset – our people.



Our Values and our Code help us maintain accountability and integrity, ensuring the success of our employees and the company.

Introduction: Doing Well by Doing Good

The Purpose of Our Code

As a NextEra Energy (the “Company” or “our Company”) employee, you are empowered to help create a better future. This kind of power comes with stringent requirements, however – namely, those set forth in our core values and by our Company’s Code of Business Conduct & Ethics (the “Code”), Company policies and the laws and regulations that govern our work must also be carefully followed.

While representing NextEra Energy, you should also strive to advance the interests of our Company, colleagues, customers, communities and other stakeholders. If we do not hold ourselves accountable for our actions, we can never truly progress.

Violations of our Code, values, policies or the law will carry serious consequences for the individuals involved, as well as for NextEra Energy as a whole. Those individuals engaging in unethical or illegal behavior and those who direct, condone, approve or facilitate such behavior, will be subject to legal action and disciplinary action, up to and including termination. Behavior prohibited under the Code puts all of us at risk of a damaged reputation, negatively affects our stakeholders and may subject us to fines and civil or criminal liability. For your convenience, the Code contains references and links to policies which are prescriptive, providing clear rules and guidelines for various topics and focus areas.



The requirements set forth in this NextEra Energy, Inc. Code of Business Conduct & Ethics must be followed. Our Code exists not only to demonstrate NextEra Energy’s commitment to doing the right thing, but also to ensure our Company’s continued success. It gives us the guidance to act appropriately as we strive to reach our business goals and meet the needs of our customers and communities in an ethical and sustainable way.

Who is Expected to Follow Our Code

Our Code applies to everyone at NextEra Energy, including those who do business on our Company’s behalf. You must read, understand and abide by our Code. You also must be familiar with our Company policies, many of which are referenced in the applicable sections of this Code, and all of which are available on [eWeb](#).

Where is Our Code Applicable

Employees and representatives of our Company must follow our Code regardless of their location. Inappropriate conduct outside of work can have an adverse effect on your coworkers, NextEra Energy’s reputation and our ability to serve our customers.

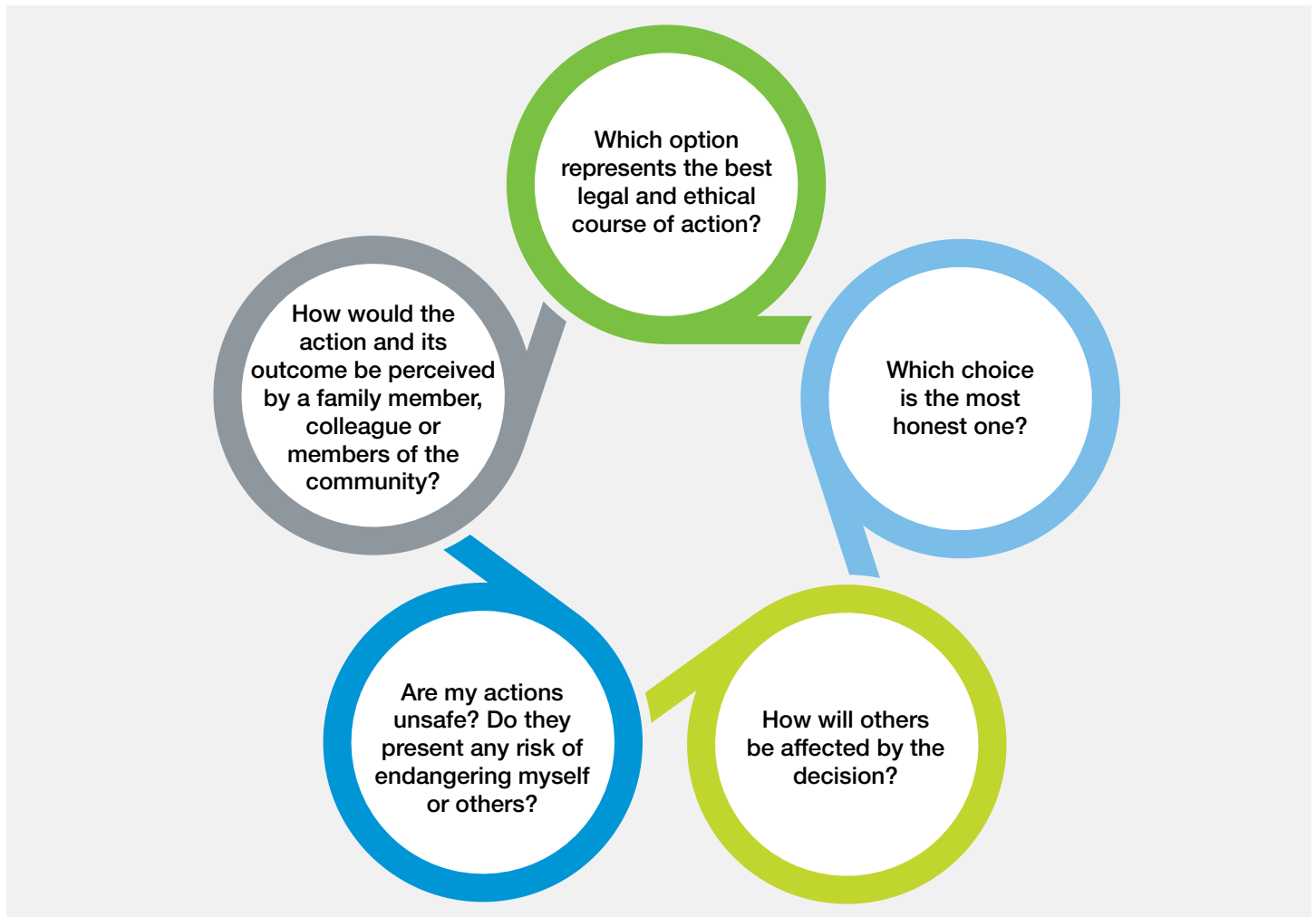


The Code of Conduct is intended to provide guidance for ethical behavior; however, it is not intended to list all unethical situations or inappropriate actions. Good judgment is imperative in complying with our Code of Conduct.

Ethical Responsibilities

As you do your job, you may find certain situations where the ethical course of action conflicts with, for example, your ability to meet financial or budgetary goals or meet a tight deadline. This is an area where our Code can help by providing resources and guidance when the right course of action is unclear. For instance, you might seek out your manager to ask questions or for help on how to proceed.

When contemplating the best course of action, you need to consider the following:



In addition to following the requirements set forth in our Code and policies, all employees are expected to demonstrate their personal commitment to this Code. Employees must foster a workplace that promotes compliance by promptly escalating any known or suspected violation of our Code or policies by taking extra care in using and monitoring the use of all safeguards in the workplace, including Company procedures, safe work practices, or personal protective equipment.

Managers and supervisors are expected to lead in demonstrating personal commitment to our Code. Managers must also ensure that no retaliation occurs against a NextEra Energy employee who in good faith raises concerns or reports violations of our Code. Never hesitate to take the appropriate action if you witness an act of retaliation or suspect one has occurred, regardless of who is involved in the scenario.



Leader expectations include:

- » lead by example and ensure all employees are aware of our Code, other Company policies and procedures and applicable laws and regulations.
- » create an “open-door” environment where employees feel comfortable asking questions, making reports or raising concerns.
- » promptly escalate any known or suspected violations of our Code or policies.
- » consider an employee’s demonstration of his or her commitment to ethics and compliance when providing regular feedback and evaluations.
- » take extra care in monitoring the use of all safeguards in the workplace, including Company procedures, safe work practices and personal protective equipment.
- » complete and ensure employees under their supervision complete all required compliance training programs.

Personal Commitment

NextEra Energy believes that asking questions and reporting, in good faith, known or suspected misconduct benefits all of us. In fact, our Company feels so strongly about open communication that we are committed to answering all questions promptly and taking all reports seriously. You are encouraged to talk to someone in authority (see list below) if you see something that does not seem right. You are encouraged to do so even if you are not positive that a violation has occurred, if you always act in good faith.

Since our Code cannot possibly address every situation we may face, it is up to each of us to use good judgment and common sense to ensure that our Company maintains the highest standards of integrity.

If you know or even suspect that misconduct has occurred or if you simply have a question about the right course of action, talk to your manager or supervisor, head of business unit, Human Resources or Internal Audit or the following listed below:

A Compliance Officer

- » Vice President, Compliance & Corporate Secretary
- » Vice President, Internal Audit
- » Executive Vice President & General Counsel

Equal Employment Opportunity Hotline

888.552.1055

Or complete a discriminatory/harassment reporting form in HR4U

The Code of Business Conduct & Ethics Hotline

888.906.9NEE (888.906.9633)

nexteraenergy.ethicspoint.com

Nuclear Safety Employee Concerns Hotline

800.645.5105

Corporate Security: 561.694.5000

eWeb/bunit/corpservices/security


Each Hotline is available 24 hours a day, seven days a week. You are encouraged to make full use of these resources by asking questions, expressing concerns and reporting possible violations of our Code, Company policy or the law. You are strongly encouraged to identify yourself when making a report so that our Company can contact you for further information, if needed, as it conducts its investigation. This will also allow the Company to report back to you on the results of its investigation, as appropriate. NextEra Energy treats reported information in a confidential manner to the extent reasonably possible and as allowed by law. However, you may make a report anonymously if you feel more comfortable doing so.

For more information about reporting concerns, refer to the [Reporting Concerns policy](#).

Non-Retaliation Commitment

If you observe or suspect any deviation from our Code, Company policies or the principles embodied by them, it is your responsibility to report your concerns. You may report your concerns through any of our channels without fear of retaliation or negative impact on your employment for having done so. NextEra Energy prohibits acts of retaliation against any person for reporting a possible violation in good faith or for participating in any investigation.

Acting in “good faith” means that you provide a sincere, complete report that you believe to be true. In other words, it does not matter whether your report uncovers actual misconduct, as long as you deliver it honestly and with all relevant facts. Anyone who retaliates against another individual for making a good faith report will be subject to disciplinary action, which may include termination of employment. Conversely, anyone making a bad faith report will also be subject to appropriate disciplinary action.




The act of retaliation occurs when a supervisor, manager or a peer acts negatively toward a person because he or she raised a concern.

Investigations and Consequences

NextEra Energy strives to apply consistent principles when conducting investigations. When a concern is reported, the information is forwarded to the proper resource for investigation. Those who make reports to the Code of Business Conduct & Ethics Hotline will receive a case number. This number enables you to check on the status of the investigation. You may be asked to provide additional information and will be notified when an investigation is completed. This is all done to the extent practicable under the circumstances.

As an employee, you are required to cooperate with all investigations, subject to applicable law. This means that all communications you make about the topic of an investigation are to be delivered honestly and completely. It also means retaining complete records and any other type of information you may have, as directed in our Confidential Records Accessing, Handling and Destroying policy. Failure to do so will subject you to disciplinary action.



Our Company will promptly, discreetly and professionally follow up on any indication of a breach of the law or our Code.

Investigation Process



Legal Responsibilities

Regardless of title, position or tenure, you have a duty to know and strictly follow our Code, the law and all Company policies. Additionally, you must know and follow the laws and regulations that apply to the work you do and the places where we do business – whether working in or outside of the United States. When you are unclear about the meaning or importance of a section of our Code, you should not hesitate to ask questions. Note, you must certify, on an annual basis, that you have read and understand our Code. Compliance with our Code is non-negotiable.

We Are Committed to Excellence

Federal Energy Regulatory Commission (FERC)

As a wholesale electricity provider, NextEra Energy must follow FERC requirements. These requirements regulate the transmission and wholesale sales of electricity and natural gas in interstate commerce. FERC requirements are described more fully in the following sections.

Florida Public Service Commission (FPSC)

Florida Power & Light Company is an electric utility regulated by the FPSC. We must adhere to the rules and regulations set forth by that commission.

FERC Standards of Conduct

FERC's Standards of Conduct (Standards) are intended to prevent transmission providers from giving their marketing employees preferential treatment or an unfair advantage by prohibiting the sharing of non-public transmission information. The Standards require that some transmission employees work independently from marketing employees who engage in sales of energy or transmission with the transmission provider. Marketing employees cannot have access to or receive, non-public transmission information. Any such sharing of information requires immediate disclosure to the public.



You are responsible for making sure that you understand and implement the Standards that apply to your job.

FERC Affiliate Restrictions

FERC's Affiliate Restrictions (Restrictions) are intended to make sure public utilities with captive customers do not provide preferential treatment or unfair advantage to affiliated companies that sell electricity at market-based rates. The Restrictions require that employees of these groups must operate separately unless they are employees who provide shared services. The Restrictions require that public utility market information not be shared with its affiliated companies if such sharing could harm the utility's customers. You are responsible for making sure that you understand and implement the Restrictions that apply to your job.

FERC Cross-Subsidization Rules

The Cross-Subsidization Rules are intended to prevent utilities with captive customers from harming its customers by purchasing goods and services from affiliates at above market prices or selling goods and services to them at below market prices. You are responsible for making sure that you understand and implement the Cross-Subsidization Rules that apply to your job.



We comply with FERC, NERC and applicable state compliance codes of conduct

North American Electric Reliability Corporation (NERC) Reliability Standards

NERC is the organization whose mission is to ensure the reliability of the bulk power system in North America. To do so, FERC granted NERC the authority to develop, monitor and enforce Reliability Standards.

Reliability Standards are the planning and operating rules that electric companies follow to make sure we provide reliable electricity. As part of these Reliability Standards, NERC developed the Critical Infrastructure Protection (CIP) Reliability Standards to protect against utility cyberattacks. You are responsible for making sure that you understand and implement the Reliability Standards requirements that apply to your job.

State Compliance Codes of Conduct

Many of our regulated businesses operate in states such as Texas and California, for instance, that require independent operations for regulated entities and identified affiliates. These requirements include prohibitions on sharing non-public information or providing preferential treatment to affiliates. You are responsible for making sure that you understand and adhere to applicable State Code of Conduct requirements that apply to your job.

For more guidance on FERC, NERC and the State Compliance Codes, visit the [compliance website](#) or contact the Vice President, Compliance & Corporate Secretary.

We Maintain Accurate Records

When it comes to ensuring the accuracy of our financial and other records, we each have a role to play in ensuring that the information is entirely truthful. As a publicly traded company, it is imperative that we prepare all our financial statements in accordance with generally accepted accounting principles and properly represent the



NextEra Energy employees are expected to:

- » be familiar with and follow our energy trading and risk management policies and procedures, as well as the Commodity Futures Trading Commission (CFTC), FERC, Regional Transmission Organization (RTO) and Independent System Operator (ISO) rules and regulations.
- » direct any questions regarding commodity marketing and trading activities to your supervisor or the Law Department.

financial condition and results of our Company. All reports that we file with a government agency must be complete and accurate and must not mislead, misrepresent or omit information, no matter what.

In order to protect the integrity of our books and records, you have a duty to report any instances of incorrect or fraudulent record keeping, false representations (oral or in writing) or hiding or mischaracterizing Company funds, assets or transactions—whether by another NextEra Energy employee or a third party. You must submit any concerns or complaints through any of the reporting channels listed in our Code.

Records Retention

Managing our records is a critical component of building trust with our customers, regulators and shareholders. Effective records management allows us to meet our business needs and ensure our records are readily available when we need them. It also helps us comply with all applicable laws and regulations and preserve any relevant records in case we need them for litigation, audits or investigations.

That is why it is critical for you to follow our Company's records management policies and retention schedules. These items are resources that define what business records need to be retained, the length of time business records must be retained, the appropriate procedures for complying with litigation holds and other responsibilities. (A litigation hold applies to documents connected with actual or anticipated litigation. Accordingly, all relevant documents must be retained for the duration of the hold).

For more information about this section, refer to the **Records Management – Policies and Responsibilities** policy and the **Documents Subject to Litigation Hold** policy.

Internal and External Audits

When internal and external auditors request information from us, they are entitled to receive it. It is our responsibility to provide this information, never impeding or delaying any audit or appropriate requests. If you have questions about the request, ask your supervisor, the appropriate auditor or a Compliance Officer.

Government Investigations and Other Inquiries

We all have a duty to cooperate fully with government, agency investigations and audits. This means we are required to provide the appropriate information, as requested, in a timely manner. However, if you receive any requests for information associated with a governmental investigation, you should immediately contact the Law Department.

We Observe Securities Law

In the course of your work, you may become aware of information about our Company (or other companies) before the public hears about it.




Keep in mind that it is unlawful for you to destroy, conceal or falsify any document for purposes of obstructing any governmental or legal proceeding, investigation or lawsuit.

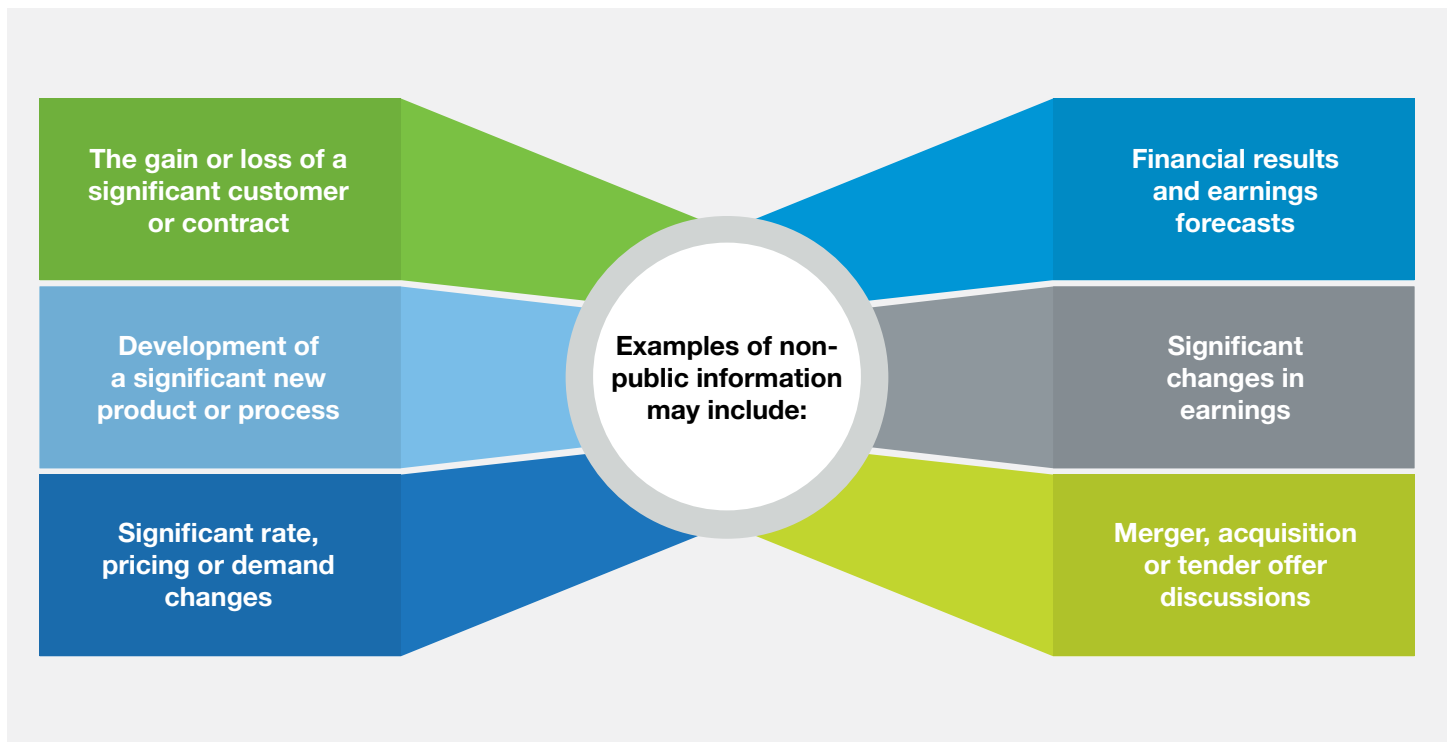
We Observe Securities Law *(continued)*

It is important that you never disclose or use for your personal benefit, any material, non-public (or “inside”) information you know or possess.

Material, non-public information comes in various forms. Generally, it is information that a reasonable investor would consider important when making an investment decision, like buying or selling stock.



The purchase or sale of securities while knowing nonpublic information or the disclosure of nonpublic information to others who then buy or sell securities based on them, is prohibited.



Trading on material, non-public information is a violation of insider trading laws, which can subject the individuals involved to disciplinary action up to and including termination, as well as to potential civil and criminal penalties. It is also illegal to provide inside information to others (or “tip” them) in making their investment decisions. You should also be sure to know and follow specific laws, such as Regulation Fair Disclosure under the Securities and Exchange Act of 1934 (Regulation FD). This regulation makes it illegal for any of us to selectively disclose material, non-public information.

To help you comply with these rules, our Company has established procedures for the release of material non-public information, including the designation of Company spokespersons. These procedures ensure that information reaches the public in an appropriate way. You may not disclose material, non-public information to anyone outside our Company, unless you are specifically authorized to do so under our guidelines for communication with the public and Regulation FD policy. This includes discussions concerning NextEra Energy business in all social media forums, as well as other verbal and non-verbal forms of communication.

For more information about this area, please see our [Securities Trading](#) policy and our [Regulation FD](#) policy.

Q: Suzanne and Margie worked in the same business unit for several years and remained close outside the office, often going out to dinner with their husbands. At dinner, Suzanne discussed her new role to Margie and her husband, Dan. She also mentioned the challenges of working long hours on NextEra Energy's potentially extremely lucrative acquisition. The news of the acquisition surprised Margie. Several days later, Dan shared the news of the acquisition with his friend Steve. Steve decided it was a good time to purchase NextEra Energy stock given this information about the pending acquisition. What violations of the Securities Exchange Act have just occurred?

A: A number of violations have occurred. The first violation occurs when Suzanne, who is an "insider", shared non-public information either accidentally or knowingly with Margie and Dan. In the event that Suzanne realized she accidentally disclosed insider information to Margie and Dan, she should inform them that they cannot share the information with anyone and she should notify the Law Department so that they can assist her in appropriately protecting the news until it becomes public.

Margie, also considered an "insider", was unaware of the pending acquisition, as her job role did not require her to be aware. Dan being Margie's husband has a duty to keep confidential any company information, but instead he tips off Steve, exposing her to liability and himself to insider trading. Lastly, Steve, who bought insider information from Dan and traded on it, committed securities fraud.

We Safeguard Company Assets and Information

To perform your daily work, you use various assets – assets that are placed in your care by NextEra Energy. You are responsible for protecting all property and resources entrusted to you, including any equipment, facilities, funds, data and documents to which you have access. You must take reasonable precautions to protect all Company assets against theft, damage or misuse.

While occasional personal use of some of these resources may be acceptable, you must keep in mind that Company assets are intended to be used for business purposes. Likewise, Company devices are important and costly assets and should always be used appropriately and responsibly. You should avoid leaving any devices where they could be lost or stolen.

For more information, refer to the Information Management and Records Management policies that are available to you.



Company information that is deemed sensitive or confidential cannot be saved, copied or accessed on a personal device.

Confidential and Proprietary Information

The assets we use in our daily work are not always tangible. In fact, one of our most valuable resources at NextEra Energy is our Company's confidential and proprietary information – information that is not available to the public. This kind of information must be protected as carefully as you would guard the laptops and other devices that contain it. You may only share this information with people who are authorized to have it for legitimate business purposes. You are expected to understand the types of information considered to be confidential for the company with which you work.

Personally Identifiable Information (PII) is the sensitive, personally identifying information of individuals (like employees and their families and customers) including Personal Health Information (PHI).

Confidential Information (CI) is information that is not available to the general public and is proprietary to NextEra Energy. It includes both physical and cyber property.

Broadly speaking, Personally Identifiable Information (PII) can include:

- » User ID/passwords for fpl.com
- » Financial Account Information
- » A username or email address in combination with a password or security question and answer
- » Social Security number or similar ID number
- » Date of birth
- » Mother's maiden name
- » Passport number
- » Driver's License number

- » Personal Medical Information
- » Biometric Data



Confidential information can include:

- » Business plans and strategies
- » Third-party or vendor information subject to a confidentiality or non-disclosure agreement
- » Pricing policies or budgets
- » Non-public information of products, services, customers and employees (e.g., social security numbers, etc.)

Confidential information also includes trade secrets or data that give a company a competitive advantage. Some examples of trade secrets may include:

- » Customer lists and customer usage
- » Terms and conditions, rates or fees offered to certain customers
- » Technological developments
- » Operation plans and processes

If you possess Company trade secrets or any other confidential or proprietary information, do not disclose it without a clear-cut business need and prior authorization to do so. Properly securing your computer when you are not using it and encrypting, and password-protecting information can help protect the sensitive information in your care. In addition, avoid discussing such information in places where you can be overheard, such as, busy restaurants, public restrooms, airports or elevators. Your obligation to protect confidential and proprietary Company information continues even after your employment ends. You also have an obligation to protect the information shared by our employees, customers and business partners. To do so, you must uphold NextEra Energy’s privacy policies when employees’ and third parties’ personal or confidential information is collected, stored, processed, transmitted and shared.

For more information about this section, refer to the [Confidential Records – Accessing, Handling and Destroying](#) policy, the [Cyber Access Confidentiality](#) policy, the [System Password](#) policy and the [Corporate Privacy](#) policy.

Employee Privacy

As an employee, you provide sensitive personal, medical and financial information to our Company. NextEra Energy is committed to securing this information and protecting your personal privacy. To access the sensitive information of your fellow employees, you must have specific authorization and a business need to do so. If the nature of your job requires you to come into contact with this information, you must treat it with special care.

Keep it secured from loss or theft and use it only as is necessary, according to the law and Company policies and procedures. When sending personal and confidential data to an outside source, use all reasonable safeguards against loss, destruction or inadvertent disclosure.

If you have additional questions on protecting or disposing of employee data, consult with your manager. For more information, refer to the Employee and Personnel Files policy.

Q: James sends a spreadsheet to the printer, which he shares with everyone on the floor. The same tray with James’s spreadsheet contained a second printed spreadsheet containing Personally Identifying Information (PII). It includes employee names, dates of birth and social security numbers. When James asks his peers if the mystery spreadsheet belongs to them, no one claims ownership. James knows that unsecured data poses a risk, but isn’t sure what to do about it.

A: As a result of James discovering improperly displayed PII, regardless of format or classification, the Privacy Incident Response Team (PIRT), Corporate Security or the Information Security team must be notified immediately, this also applies to any actual, suspected or potential breach of security or improper disclosure of PII. The following contact information is provided:

Compliance & Responsibility Organization (CRO)	Ethics&Compliance@nee.com
Corporate Security	24/7 Security Operations Center at: 561-694-5000 or Security.Operations@fpl.com
HIPAA Privacy Officer	Sr. Director Employee Benefits 561-304-6123 or HIPAA. SharedMailbox@nexteraenergy.com
Information Security	Information-Security@fpl.com
Privacy Incident Response Team (PIRT)	privacy@nee.com


**In the event of any actual, suspected or potential breach of control over or inappropriate disclosure of Personal Health Information (PHI) regardless of format contact the HIPAA Privacy Officer (for any format of group health plan or onsite clinic protected health information) immediately.



Intellectual Property

While many of us possess confidential and proprietary information about our Company, some of us may also have access to NextEra Energy's Intellectual Property (IP). IP – while valuable to our Company – is not always confidential information. Much of our IP is public information; it is just protected by law. For example, IP can include information such as copyrights, trademarks, designs, logos and brands, as well as information communicated orally or through written and electronic documents. Like other types of information, the unauthorized release or use of our IP could prove harmful to our organization.

For more information about how to handle proprietary, confidential or IP assets, be sure to review the **Confidential Records – Accessing, Handling and Destroying** policy.



NextEra Energy owns the rights to all IP created with Company materials, on Company time, at the Company's expense or within the scope of your duties.

We Use Company Technologies Responsibly

We often draft emails, instant messages and text messages on Company-provided devices. When doing so, you should compose them with the same care you take in composing any other NextEra Energy document.

Electronic messages, both personal and business-related, are lasting and recoverable written records that can easily be copied, altered and forwarded worldwide without your knowledge or consent. At no time may you use Company resources for unauthorized, illegal or unethical purposes. This includes searching, storing or disseminating sexually, racially or ethically suggestive, offensive or explicit material.

Furthermore, you are responsible for using NextEra Energy's network and computer systems ethically and legally and doing your part to help protect our Company's assets from cyber-attacks. While occasional, personal use of these systems is permitted, you should remember that our Company reserves the right to monitor your use, except when prohibited by law. You should review and follow all security measures and internal controls for our information and communications systems.



Cybersecurity

Protecting company data is important to the security of NextEra Energy and it's imperative that employees understand the significance of their duty to join the fight against cyberattacks.

As an added layer of security, you must safeguard your passwords and other access codes by not divulging them to anyone else. You should never allow others to use your accounts – even fellow employees. Software on your computer and other electronic devices is Company property and must be used according to licensing agreements. You may not copy it without permission.

Each of us is responsible for adhering to all Cybersecurity and Data Privacy policies. Violations of these policies may result in corrective or disciplinary action, including termination.

NextEra Energy employees are expected to:

- » not respond to any emails that appear suspicious or click on any links or attachments embedded in these types of emails.
- » report suspicious emails immediately.
- » use strong passwords and ensure they are unique to each account and updated regularly.
- » never reveal your password to anyone. If it becomes known or you suspect someone might have guessed it, change it immediately

For more information, refer to the [Electronic Communications](#) policy, the [Software on NEE Computer Systems](#) policy, [Information Management](#) policies or refer to the [Cybersecurity](#) website on eWeb.



Cybersecurity is everyone's responsibility, as all employees – regardless of their role – have access to vital information that must remain secure.



We Do The Right Thing

We Protect the Environment

At NextEra Energy, we comply with all environmental laws, regulations and permit requirements. We design, construct and operate our facilities in an environmentally sound and responsible manner. We also respond immediately and effectively to any known environmental hazards or noncompliance situations. Our commitment to the environment does not end there. We proactively pursue opportunities to exceed current environmental standards, including reducing waste and emission of pollutants, recycling materials and conserving natural resources throughout our operations. We also encourage the efficient use of energy, both within our Company and in our communities.

These actions are just a few examples of how we are committed to the environment. To learn more, refer to the Environmental policy.

To ensure that NextEra Energy is adhering to its environmental commitment, we have developed rigorous environmental governance procedures and programs. These include our Environmental assurance Program and Corporate Environmental Governance Council. Through these programs, we conduct periodic environmental self-evaluations to verify that our operations are in compliance with environmental laws, regulations and permit requirements. Regular evaluations also help us identify best practices and opportunities for improvement.



For more information about environmental governance programs and other environmental questions, you are encouraged to contact the Vice President of Corporate Environmental Services.

Q: Lucas works at a power plant and has received extensive training on environmental rules, permit requirements and how to minimize environmental impact. One day, Lucas noticed oil on the ground next to a barrel and it looks like dirt was being used to cover up the spill. His team was pressed for time that day, but he is concerned about the impact of the spill on the environment, and he knows from his training this kind of spill may have to be reported. What should he do?

A: At NextEra Energy, we are committed to doing what is always right for the environment. When pressed for time, many people are tempted to cut corners and ignore important rules and safeguards. However, not cleaning up a spill can have a devastating impact on the environment and could create a hazard for human health. In addition, there are reporting requirements for certain types of spills and not doing so could lead to sanctions and criminal charges. Lucas is expected to immediately report this type of incident to his supervisors, as well as follow established processes to address the problem and prevent such incidents from occurring again.

We Avoid Conflict of Interest Situations

When working for NextEra Energy, you make a commitment to act in the best interest of our Company. In order to perform your duties free from unfair bias, you must be alert to any situations that may create a conflict of interest. A conflict of interest arises when your loyalty to NextEra Energy is affected by an actual or potential benefit or influence from your personal interests or an outside source. You should all be aware of any potential influences that impact or appear to impact your loyalty to our Company. Conflicts of interest not only compromise the success of our Company as a whole, but also confront us with difficult personal decisions. The most important thing to remember is that you must avoid even the appearance of any conflict in your decisions.

It is not possible to describe every potential conflict of interest, so our Company relies on each of us to exercise sound judgment and common sense and to adhere to the highest ethical standards. To assist us in this regard, a few of the more common situations in which a conflict



of interest arises are described below. For more information, refer to the **Conflict of Interest** policy.

If you believe you are involved in a conflict of interest situation or if you have a question of whether a potential situation might create a conflict, you must disclose this potential conflict of interest situation to your supervisor and complete **Form 372** on eWeb prior to acting with respect to potential conflict situation.



A conflict of interest is any activity, investment, interest, association or relationship (including relationships with immediate family members, relatives, friends and close personal relationships) which conflicts with the independent exercise of judgment in connection with your duties and/or employment with the Company.

Personal Relationships

A conflict of interest can arise if you or any related person has a personal stake in a company that is a customer, business partner or a competitor of NextEra Energy.

If you find yourself in a situation in which you or a related person has a personal stake in a customer or business partner that does or seeks to do business with us, as described above, you must not use your position to influence, in any way, the business arrangement or the administration of associated invoice payments.

If you are involved in any portion of the decision-making process regarding a transaction involving NextEra Energy and any third party in which you or a related person has an interest, notify your manager immediately and remove yourself from the decision-making process.

Personal relationships include a relative or related person, such as your spouse, civil partner, parents, children, siblings, stepparents, mothers-in-law and fathers-in-law, sons-in-law and daughters-in-law, any person living in the same house with you, any business associate of yours and anyone who is a close personal friend of yours.

To be the strongest team possible, we must all be treated fairly. When a personal or family relationship between employees exists, particularly one that is also a reporting relationship, it may seem that one employee is receiving preferential treatment or favoritism. Therefore, no family member should be placed in a position where he or she has direct reporting or decision-making authority over another family member. We discourage employment relationships that reasonably create the potential for impropriety, undue influence or favoritism.

For more information, refer to the [Employment of Relatives](#) policy.



Competing Against NextEra Energy

In order to make objective business decisions on behalf of NextEra Energy, you must never compete with our Company. This means you may not take for yourself any business or investment opportunities that you discover through your position at NextEra Energy or through Company property or information. In addition, you must never help anyone else take such business or investment opportunities for personal gain.

Accepting outside employment may at times create a conflict of interest. To avoid such a situation, you should not accept another job that interferes with your ability to do your work for NextEra Energy, including outside business that conflicts with your normal working hours. Similarly, you may not use NextEra Energy property, equipment or information to benefit another business. To preserve our Company's interest, you must not take employment with a NextEra Energy business partner or competitor while maintaining your employment with NextEra Energy.



Because taking outside employment may create a conflict of interest, you must disclose it to your supervisor and complete Form 372 on eWeb before accepting a second job.

Examples of potential conflicts may include, but are not limited to:

Activities Requiring Disclosure	Defined	Policy
Influencing decisions	Having a substantial investment in any supplier, customer or competitor where the Company employee has influence over contracts, processes, products or makes supplier or Company business decisions with respect to that entity.	Refer to the “ <u>Antitrust Law and Competition Compliance Policy</u> ”.
Hiring	Filling a position with an immediate family member, Relative or person with whom you have a close personal relationship.	Refer to the “ <u>Employment of Relatives Policy</u> ”.
Outside employment	Acting as an employee, officer, representative, agent, auditor or advisor of a supplier, customer (other than one who simply has its electricity supplied by FPL as a retail customer), partner, subcontractor or competitor of our Company.	Refer to the “ <u>Conflicts of Interest Policy</u> ” for further guidance.
Boards and consulting arrangements	Acting as a member of a for-profit company board or having a consulting arrangement with a business or non-profit that requires pre-approval from your supervisor and Compliance Officer.	
Gifts	Accepting gifts, entertainment, payment or services from parties conducting business with or seeking to do business with our Company if that gift or other thing of value is intended to influence materially your behavior.	Refer to the “ <u>Gifts, Meals and Entertainment Policy</u> .”
Trademarks	Using Company assets, including name, trademarks, trade names, facilities or relationships, for personal benefit or for outside work.	
Relatives and close personal relationships	If you conduct Company business with a relative, someone you have a close personal relationship or with a business or government agency that you or a relative or someone you have a close personal relationship is associated with, this should be disclosed and may not be permitted.	Refer to the “ <u>Conflicts of Interest Policy</u> ”.
Investments and ownership interests	Having an investment in an entity that does or seeks to do business with our Company or is a supplier or competitor or in property (i.e., real estate, patent rights or securities) that our Company is seeking to purchase.	Refer to the “ <u>Conflicts of Interest Policy</u> ”.

Q: Lynn and her sister, Beth, both work for competing companies - Lynn for NextEra Energy and Beth for another energy provider - and Lynn is successful, but her sister is struggling, so Lynn is desperately trying to help her. When Lynn learns about a landowner interested in hosting wind turbines, she refers her sister to the lead, hoping it may generate some business for Beth's company. Although Lynn still intends to pursue the lead for NextEra Energy, she figures that helping her sister and hoping the best company wins can't hurt, right?

A: Lynn should not encourage her sister, who works for a competitor, to pursue our business leads since this would be counterproductive to our business goals, and lead to lost opportunities for NextEra Energy. If our Company identifies or is approached by a landowner, we must capitalize on the opportunity. It's understandable that Lynn would want to see her sister succeed, but she cannot do so at the expense of NextEra Energy. Confidential information, such as leads for developers, must be carefully protected and not shared inappropriately.

Holding Significant Outside Financial Interests

Having investment in or a business relationship with a competitor, customer or supplier of NextEra Energy can divide our loyalty. A substantial investment in an entity is one that is so large (one that, for example, exceeds 1% of the total equity, ownership or outstanding debt of the entity or comprises a substantial portion of your total net worth) that it creates the appearance of a conflict of interest, whether or not your loyalties are actually divided.

Likewise, you may not engage in any transaction involving NextEra Energy if you or a related person, has an interest in the transaction or can benefit directly or indirectly, without disclosure of the potential conflict and by following other than through our normal approved processes.

Disclosing Conflicts

A conflict of interest is not necessarily unethical, nor does it always constitute a violation of our Code. However, it is necessary for you to disclose actual or potential conflicts promptly, to ensure a fair and prompt resolution. However, that disclosure alone is not enough – as always, you are expected to do the right thing and act with transparency and integrity until the situation is appropriately documented and resolved.

Should a conflict of interest arise or appear to arise or if you are involved in a situation that may develop into a conflict, it must be disclosed immediately to your supervisor and via Form 372 on eWeb. This way, the situation can be properly reviewed and directed to the appropriate resource. **If you are in doubt about a situation, ask a Compliance Officer.**

NextEra Energy employees are expected to:

- » recognize situations that may create potential conflicts of interest between you and our Company.
- » disclose actual or potential conflicts using the Self-Reporting Conflicts of Interest Form (Form 372), consistent with Company policy and applicable laws and regulations.
- » not use Company property, Company information or your position for your personal gain or the personal gain of those with whom you have a close personal relationship.

We Exchange Business Courtesies Ethically

At NextEra Energy, we win business based on the quality of our offerings – not our ability to be swayed by business courtesies or favors. To preserve our good reputation, you must use caution when giving or accepting gifts or entertainment. You should not exchange business courtesies with an existing or potential supplier, contractor, vendor, business partner or customer if the intent is to elicit an unfair business advantage for NextEra Energy.

You may only accept gifts if they are:

- » reasonable (worth \$250 or less)
- » infrequent (cannot total more than \$250 in any 12-month period per provider)
- » in good taste
- » unsolicited
- » customarily offered to others having a similar relationship
- » not cash or cash equivalents (gift cards)
- » in compliance with applicable laws and regulations



Gifts are usually goods and services but can be defined as any item of value. For example, when the person offering a meal or entertainment is not attending the meal or event, it is considered a gift.

Entertainment is generally defined as a situation where both a representative from the provider and the recipient are present.

For more information, refer to the [Gifts, Meals and Entertainment](#) policy.

NextEra Energy employees are expected to:

- » not accept gifts from parties conducting business with or seeking to do business with the Company if that gift or thing of value is intended to materially influence your behavior or decision.
- » obtain preapproval for gifts offered in accordance with our [Gifts, Meals, and Entertainment policy](#).
- » report any monetary gift or invitation to an event that is not in accordance with our policy or if an item arrives at your office or home that is not in accordance with our policy.
- » understand that you may attend the occasional meal or event, provided that the event is customary and reasonable and both the provider and recipient are there. When offered travel or lodging, you must seek approval in advance from your business unit vice president.
- » never bias your decisions in any way, even if you receive gifts that meet the criteria outlined above. If you are unsure whether a gift conforms to our policy or might be construed as being in excess of a normal, customary business courtesy, you should discuss the matter with a Compliance Officer.
- » report any money or gift that does not fall within the exceptions listed above to your supervisor and Compliance Officer, in writing. The same rules apply if money or gifts are sent to your home or office address. The Compliance Officer will provide guidance as to the next steps.

Also keep in mind that the laws and policies that apply to providing gifts and entertainment to a government official are substantially more stringent than those that apply to our commercial partners. For additional guidance, please carefully review the “We Do Not Resort to Corruption or Bribery” section that follows.

Q: Paul, an employee of NextEra Energy, is currently negotiating with a vendor for the supply of spare parts for turbines. The vendor offers Paul a very generous gift: an invitation to the Super Bowl with all expenses paid, as well as entry to the vendor’s VIP stadium box reserved for corporate guests. Although they are in the process of negotiating, Paul believes this is a great opportunity to establish a relationship with the vendor. Is this situation acceptable?

A: Despite the fact that Paul would be attending the Super Bowl with other corporate guests and the vendor would be present, NextEra Energy would not consider it acceptable for Paul to attend the Super Bowl. Attending this event could be interpreted as an attempt to influence Paul’s behavior toward the vendor or unfairly retain the vendor’s business because Paul is in negotiations with the vendor. In the event that Paul has questions about our gift policy or is uncertain whether the gift is acceptable, he should contact CRO at Ethics&Compliance@nee.com before accepting any gifts, meals or entertainment.

We Do Not Resort to Corruption or Bribery

As part of our commitment to winning business the right way, NextEra Energy will never tolerate bribery in any form. Even if we lose business or encounter delays because of our refusal to do so, we will never bribe any third party or allow or condone third parties to do so on behalf of NextEra Energy. We believe in ethically winning business through the quality of our products and services, never through bribery. We abide by laws, treaties and regulations that forbid bribery, including the U.S. Foreign Corrupt Practices Act.

To be a responsible member of our business community, you must follow these laws wherever you do business, regardless of local law or custom.

You must also never agree to pay facilitating payments, even if you are working in locations where they may be legal or a common practice. Because the money goes straight to the individual, however, we consider facilitating payments bribes and it is against our policy to pay them. If you are working with a government official, be especially cautious. You must never solicit, request or knowingly condone any improper payments from a third party to a government official on behalf of our Company.

Kickback is the return of a sum already paid or due to be paid as a reward for awarding or fostering business while in the middle of negotiations. A bribe, on the other hand, is an offer or gift of anything of value or advantage that is intended to improperly influence the actions of the recipient.

Facilitating payment is usually small and usually made in cash in order to expedite standard government services, such as processing permits, providing police protection or expediting utility services, but they are prohibited per our policy.

Government official can be a national or local government official or employee, a political candidate or an official or employee of government-owned or government-controlled entities, such as state-owned oil companies.

If you have any questions about whether the person with whom you are interacting could be considered a government official, contact a Compliance Officer right away.



It is also important to note that you may not hire a third party to do something that you cannot ethically or legally do yourself.

For more information about this section, refer to the [International Anti-Bribery Policy and Procedures](#).

Bribes may include:

- » Money, Gifts, Travel, Hospitality or other expenses
- » Below market loans, discounts
- » Favors
- » Business or employment opportunities
- » Any benefit or consideration, direct or indirect
- » Political or charitable contributions

We Comply With International Trade Laws

Although NextEra Energy conducts most of its business in the United States, there may be instances when you deliver a product, service or piece of information to or receive a product, service or piece of information from, an international location or non-U.S. citizen. Since you may not handle these situations often, it is important to make sure that you use caution and ask questions when handling exports or imports.

While this area does not apply to most of us or the main facets of our business, it is important that you understand what is expected of you – including potential tax, verification, licensing and permit requirements – and direct your questions to the Law Department.

We are also subject to U.S. anti-boycott rules, which may – as a matter of public policy – affect the way we may conduct our business. Specifically, a “boycott” occurs when one person or group refuses to do business with other people or groups. The prohibited acts may be found in contracts, invoices or other documentation.

If you receive or suspect you have received such a request, do not ignore it. Instead, immediately report it to the Legal department.

While physical export activity by our Company is limited, there are regulatory limitations for access of Controlled Technologies by non-US persons.



A deemed export is the release to a foreign national in the United States of “technology” or “source code” “required” for the “development,” “production,” or “use” of the controlled pathogen or controlled equipment

Controlled Technology is information (technology) necessary for the development, production and use (operation, installation, maintenance, repair, overhaul and refurbishing) of an item that may be prohibited for transfer to or require an export license to transfer to a non-US person.

It is the responsibility of all individuals, groups and organizations that maintain Controlled Technology inventories to understand and comply with the NextEra Energy Export Policy, along with any documentation or processes mentioned therein.

For more information about this section, refer to the NextEra Energy Export Policy.

NextEra Energy employees are expected to:

- » not offer, attempt to offer, authorize or promise any kind of bribe or kickback to obtain or retain business or gain an unfair advantage or solicit bribes or kickbacks.
- » ensure that any third party you engage to work with foreign government officials on our behalf follows the appropriate diligence process prior to engaging them by completing a **Request to Engage an International Business Party** form.
- » avoid any activity that could be construed as bribery and consult with a Compliance Officer for any questions you may have. Anti-corruption laws are complex and their violations can result in serious consequences.



We Give Back to Our Communities

NextEra Energy sends a strong message of support for our global communities and encourages your involvement in volunteer activities that reinforce this message. You may take part in these activities on behalf of our Company, so long as both the charity and/or activity have been approved. For FPL approval, contact the Vice President of Development and External Affairs. For further information, refer to the [FPL Community Activity/Sponsorship Expenses and Donations/Charitable contributions](#) policy. For NextEra Energy resources approval, refer to the [NEER Commitment Authority](#) policy.

Political Participation Process

You are encouraged to participate in political activities. You have the right to individually and voluntarily donate your time and money to the political process. However, your participation may not occur on Company time or at NextEra Energy's expense. This means, for example, that you should never engage with your fellow employees on behalf of a political candidate during the workday or expect to be reimbursed by our Company for your personal political contributions.

If you want to use Company property, facilities, time or funds for political activities, it must be pre-approved as set forth in the table at the end of this section.

You must not engage in lobbying activities on behalf of NextEra Energy, without prior consent from the applicable Vice President according to the table that follows. Further, lobbying activities may require disclosure and may be subject to specific rules that are often complicated and subject to change. It is your responsibility to ensure that you are in compliance with the applicable laws.

Your activities may be considered “lobbying” if your work involves:

- » contacts with legislators, regulators and executive branch or ministry-level officials or their staffs.
- » communications with government officials.
- » efforts to influence legislative or administrative action.
- » providing gifts or entertainment to government officials.



NextEra Energy funds may not be used to contribute to any political party, committee, candidate or holder of any government position unless such contribution is permitted by law and complies with our Company policy.

In most – if not all – states and countries, it is illegal to make contributions or give gifts to politicians, political parties or public officials that are intended to influence official actions. Moreover, among other requirements, any political contributions of corporate funds or other assets must be made directly and in the name of our Company, promote the interests of our Company, be made without regard for private political preferences, comply with all applicable Company policies, be reported in compliance with applicable laws, recorded appropriately in our Company’s books and records and be approved by the appropriate officers listed in the following table. If you have any questions, please contact the appropriate officer listed in the following table.

For:	Contact:
U.S. federal political matters	Vice President, Government Affairs-Federal
State of Florida political matters	Vice President, State Legislative Affairs, FPL
Local political matters in Florida	Vice President, Development & External Affairs, FPL
Political matters in other U.S. states	Vice President, Regulatory & Political Affairs, NEER
Foreign political matters	Vice President & General Counsel, NEER

For more information about this section, refer to the **Employee Practices for Public Duties and Citizenship Activities** and the Company’s Omnibus Political Expenditures Approval Policy.

NextEra Energy employees are expected to:

- » act independently and not represent our Company when participating in political campaigns or seeking political office.
- » notify your supervisor before making plans to campaign or serve in public office.
- » Leave all decisions to make political contributions on behalf of the Company to the officers listed above.

Non-Solicitation

It is important to note that, while your participation in community, charitable and political activities is encouraged, you should not pressure your co-workers to join you in these endeavors. If you are involved in non-sanctioned activities, avoid using Company time and resources to solicit other employees. If you would like to raise awareness for a charitable cause, ask your manager for help in doing so in an appropriate, professional way.



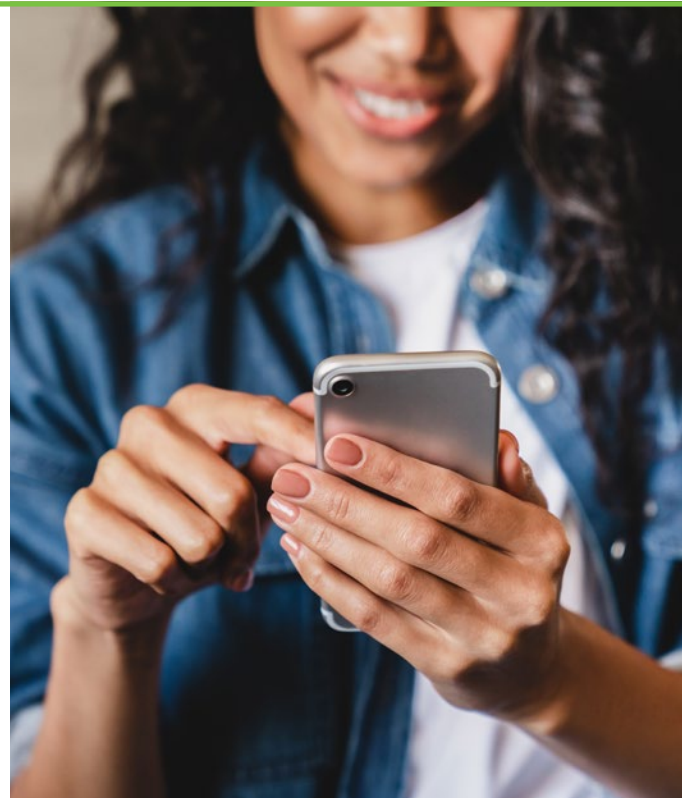
We Communicate Truthfully with the Public

We always communicate truthfully with the public. At the same time, we are consistent in our messaging and careful to promote our Company's best interests. For this reason, only authorized individuals can speak with the media on NextEra Energy's behalf. If you receive a request from the media, anyone seeking a public comment or another interested party, you should refer the inquiry to your supervisor and the Vice President of Marketing & Communication. For inquiries from investors, refer the request to our investor relations department. Do not respond yourself.

If you are interested in speaking publicly or publishing an article as a NextEra Energy representative, get permission in advance from the Vice President, Marketing & Communication. Refer to the Requests/Inquiries Received from News Media or Other Parties policy for more information.

Social Media

One way we interact with our stakeholders is through social media, including blogs, micro blogs (such as Twitter®), social networking sites (such as Facebook® and LinkedIn®), wikis, photo/video sharing sites and chat rooms. No person may use social media on behalf of our Company unless specifically authorized to do so by the Company. If you are assigned to use social media on behalf of our Company in connection with your assigned job duties, you must follow all Company policies and clearly disclose your affiliation with NextEra Energy.



For more information, refer to the Social Media policy.

You should remember that electronic messages (such as emails and text messages) are permanent, transferable records and can affect the reputation of our Company. If you believe you have witnessed an inappropriate use of NextEra Energy technologies or electronic communications on social media, notify the Vice President, Marketing & Communication immediately.

For more information, refer to the Electronic Communications policy or the External Presentation Review Guidelines that can be found at: eWeb.fpl.com/brands/templates/epr_guidelines.pdf

NextEra Energy employees are expected to:

- » conduct themselves in a way that doesn't compromise their professionalism or damage our Company's relationships with customers and the communities we serve. When you use social media for personal purposes, you should not post on NextEra Energy's behalf.
- » comply with our Company's Social Media Policy regarding the responsible use of social media.
- » report to management any disparaging or derogatory comments about our Company that are discovered on the Internet.



Q: Marcus, an employee of NextEra Energy, found an article about our Company on a public Facebook group and responded with his views as an employee. Additionally, he disputed several points in the article, citing his experience and knowledge of our Company's procedures, sparking a Facebook group discussion. During the discussion, Marcus made a joke in response to the comment of one participant, which many found offensive. As a result of Marcus' offensive Facebook post, a number of those users reported Marcus' offensive social media conduct to NextEra Energy's corporate hotline, which is publicly available on the Company's website. Although Marcus is passionate about NextEra Energy, representing the Company online is not one of his responsibilities. Is he conducting himself properly when he is interacting with the public?:

A: It is important that, despite his personal feelings, Marcus avoids speaking on behalf of our Company or divulging information online that might be sensitive or confidential. When he identifies himself online as an employee of NextEra Energy, he should also state clearly that any opinions or ideas he expresses are his own - taking a position on NextEra Energy issues or making comments about our business can be considered as an authorized statement. This can lead to confusion and misinformation for everyone involved. Finally, posting an offensive joke also violated our Social Media Policy. Use of social media even on a personal basis can affect the reputation of our Company and the employee's employment. Each employee is responsible for what they post online and inappropriate conduct outside of work has a negative effect on your coworkers, NextEra Energy's reputation and our ability to serve our customers.

We Treat People with Respect

We Value Our Fellow Employees

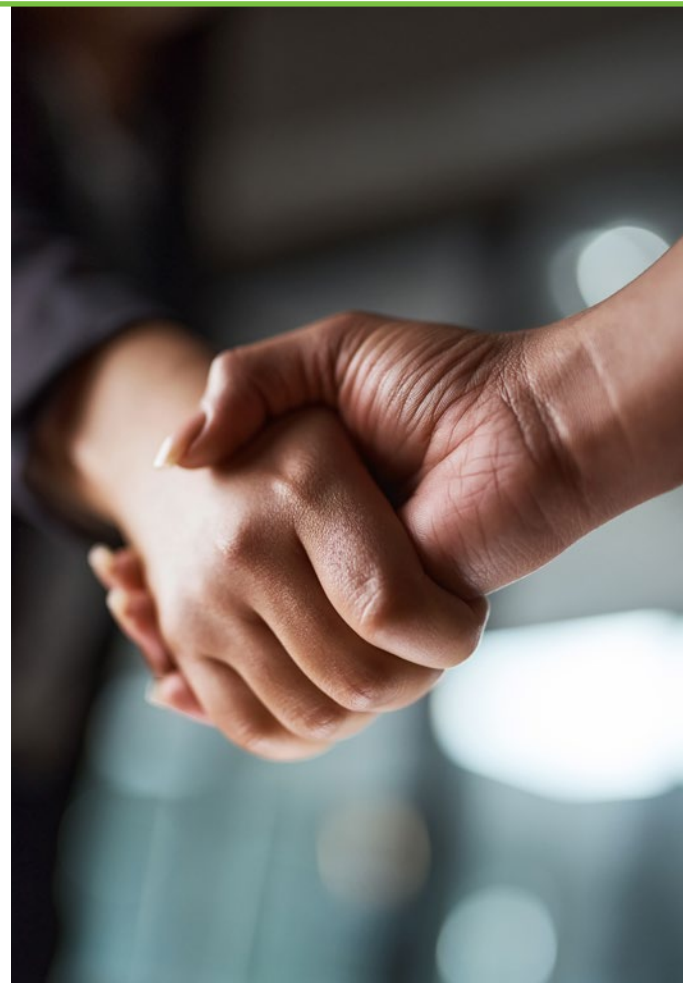
You have an important role in building and sustaining an inclusive, diverse work environment. You must show respect for people with varying backgrounds, ideas and experiences as you work for our Company. We want to ensure that everyone is accepted and rewarded according to your unique efforts and contributions. In order to be successful in this, each of you must be dedicated to our Company's Equal Employment Opportunity effort.

To encourage high performance among our workforce, our Company maintains an Equal Employment Opportunity (EEO) group in the Human Resources department. This group works to ensure a fair and inclusive work environment and to deliver quality services, with equal respect, for all.

For more information, refer to the [Equal Employment Opportunity](#) policy.

Discrimination and Harassment

NextEra Energy recognizes that employees are its most valuable asset. Accordingly, we do not make employment-related decisions or discriminate against anyone based on race, color, age, religion, sex, sexual orientation, gender identity or expression, national origin, ancestry, citizenship



status, physical or mental disability, marital status, genetics, veteran status or any other characteristic protected by law.

Employment-related decisions include hiring, promotions, transfers, recruitment, discipline, termination, compensation and selection for training programs.

Our Company does not tolerate harassment, which can take many forms. This treatment may come from fellow employees, supervisors, business partners or customers. Harassment can affect both males and females; anyone can be a victim.



Harassment is any verbal remark, physical advance or visual display that makes another feel intimidated, offended or belittled. Harassment is a form of discrimination and is never ignored by NextEra Energy.



Harassment can be sexual or non-sexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors or inappropriate comments about another's appearance. Non-sexual harassment may include offensive comments, jokes or pictures related to race, religion, ethnicity, gender, age or any other protected characteristic. To keep harassment out of NextEra Energy's environment, you must be sure that your comments and actions are always appropriate and respectful.

If you have experienced or observed any discriminatory or harassing behavior, please discuss the situation with your Manager, Human Resources, Manager of Diversity and Inclusion or call the Employee Relations Hotline at 888.552.1055 immediately.

For more information, please see the policies on [HR4U](#).

Q: Maria is Mexican born, came to the United States at the age of seven, and works in marketing for NextEra Energy. Maria loves her job and her team, but there is one co-worker, John, who is not pleasant. John thinks of himself as a comedian and when he sees Maria, he speaks to her in broken English, imitating a Mexican accent. It seems funny to John, but it humiliates Maria. Although she has never been one to create drama, part of her wants to talk to her manager about how uncomfortable John make her feel.

A: Maria is correct that Johns's behavior is unacceptable at NextEra Energy. His imitation of Mexican dialect could be perceived as discriminatory, harassing behavior. He may think it is all in good fun, but he is actually making Maria feel inferior and embarrassed. Maria should attempt to talk to John about the situation. If Maria cannot resolve the situation with John or is embarrassed to talk to John directly, Maria should discuss the situation with her manager, Human Resources, the manager of Diversity and Inclusion or contact the EEO Hotline at 888.552.1055.



Human Rights

NextEra is committed to conducting business in an ethical and responsible manner that recognizes the fundamentals of human dignity for all people and the protection of human rights. Support and compliance with this commitment and applicable laws is the responsibility of every employee and we expect the same standards from our suppliers and all other entities with which we do business.

Providing a Safe and Secure Workplace



AT WORK. AT HOME. AT PLAY.

At NextEra Energy, we work diligently, but safely at all times. No job is ever so important that you should allow or create unnecessary dangers to yourself, your fellow

employees, our customers, our Company or to others generally. NextEra Energy maintains a comprehensive safety program geared to the prevention of accidents.

If your work requires using or disposing of hazardous materials, be sure to wear protective gear and closely follow all laws and procedures that apply to the particular task.

Likewise, if you operate a company vehicle or a vehicle issued to you by NextEra Energy, you must operate it only as directed. Be sure to follow all traffic rules, including our Company's policy of no texting while driving.

For more information, refer to [Using Vehicles for Business Purposes and Use of Communication Devices While Driving](#) policies.

Ultimately, all employees are responsible for their own safety. Every employee must, for the good of all, abide by Company procedures and safe work practices. Always use protective equipment when required or necessary. In particular, our Company is committed to the highest standards of nuclear safety in the design, operation and maintenance of our nuclear power plants. **You may voice your concerns through the Nuclear Safety Employee Concerns Program by contacting the Employee Concerns Program offices or by calling 800.645.5105. You can also contact the Nuclear regulatory Commission.**

For more information, refer to the [Reporting Nuclear Power Plant Deficiencies and Corporate Privacy](#) policy.



You are required to bring to the attention of management any concerns about the safety of design, operation or maintenance of our nuclear plants.

Operating safely also means that working under the influence of alcohol, illegal drugs or misused prescriptions or over-the-counter medications is strictly prohibited. In addition, you may never use, possess, transfer or sell such substances during working hours or while on NextEra Energy premises. If alcohol is transferred in a sealed container as a gift or is used in moderation at an authorized NextEra Energy event, such limited use is allowed.

For more information, please see the **Controlled Substances and Alcohol Abuse** policy. You have a duty to report any unsafe condition through one of our reporting resources.

NextEra Energy has an online system – the Safety Activity Management (SAM) – that is used to document and investigate unsafe conditions. Information can be found on our Corporate Safety website, located **here**.

For more information, refer to **Reporting an Unsafe Condition** or Act policy.

A safe environment is also free from all forms of violence. An act of violence can take many forms. It can be a verbal or physical threat, an act of intimidation or abuse or a blatant physical assault. Whatever form it takes, violence has no place in our Company. If you witness an act of violence between any parties working on our



Company's behalf, you have a responsibility to report it right away. Corporate Security and a member of management in your area will handle the situation. If the incident escalates and you feel an immediate threat, call Corporate Security at 561.694.5000.

There are Company policies and guidelines that provide employees and supervisors with the necessary information and resources to fulfill their responsibilities in maintaining a safe and secure work environment. See **Safe & Secure Workplace Policies and Guidelines for Supervisors and Employees** for more information.

For additional information about safe and secure workplace section, review the **Safety and Security** policies.

NextEra Energy employees are expected to:

- » learn the safety laws and rules that apply to your work – whether that work is being done in the United States or abroad, in an office, in a nuclear or other plant site or while in transit.
- » report any suspicion of unethical or illegal behavior to their supervisor, the head of their business unit, Human Resources or one of the Compliance Officers.
- » report unsafe conditions using the **Safety Activity Management (SAM)**.
- » immediately notify Corporate Security at 561.694.5000, whether on or off duty, if you are arrested, charged or indicted for the commission or participation in a felony or misdemeanor (including criminal traffic violations), within 24 hours of the arrest or within 24 hours of being released from jail if incarcerated as a result of an arrest or prior to your next scheduled shift or workday, whichever is earlier.

Q: Bill drives his company car to work and one day he leaves home later than usual, and while driving, he receives a text message from his manager who is attending a conference out of state, asking for the status of a project. Bill is worried that his manager might think he's late and not at the office if he doesn't respond right away. He knows it is against the Company safety policy to text while driving, but a short answer to his manager would save him grief later. What could it hurt - just this once?

A: There is no circumstance that makes it okay to text while driving. Employees with Company cars must follow all traffic laws, including NextEra Energy's policy of no texting while driving. Bill should park before answering a text.

We Compete With Integrity

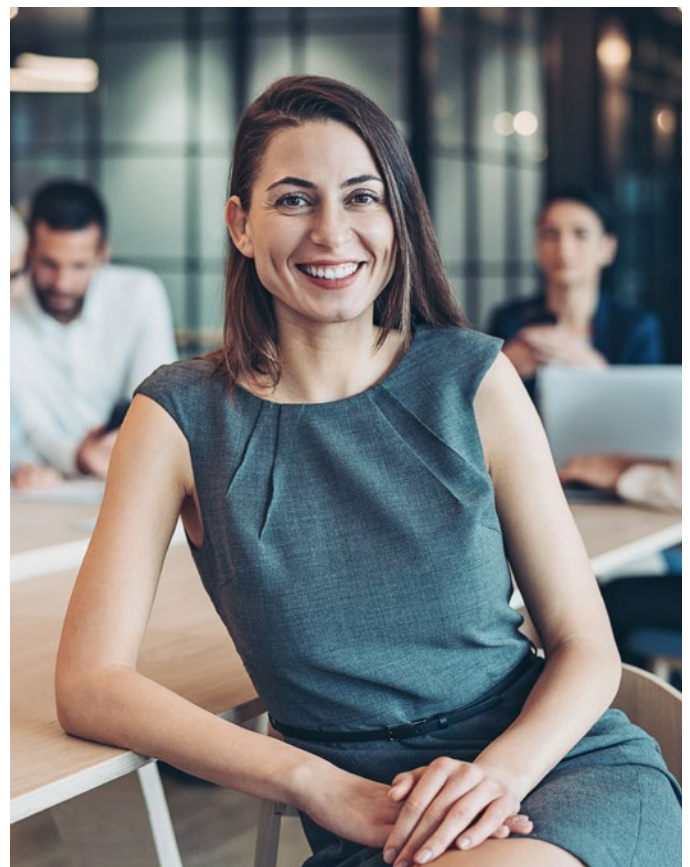
We never sacrifice our integrity to win business. This means we comply with all applicable antitrust and competition laws, wherever we do business. While complex, these laws are meant to ensure a level-playing field and fair competition in the marketplace.

In practice, these laws require that we make independent business decisions, never engaging in unfair business practices, scheming with our competitors or making other inappropriate business arrangements.

You must take special care not to discuss any of the following with our competitors:

- » Pricing, costs or marketing strategies
- » Market or customer distribution
- » Bids for contracts

If a competitor attempts to talk to you about any of these topics – or invites you into any other anti-competitive behavior – you should stop the conversation immediately and inform a Compliance Officer. Keep in mind that even the appearance of anti-competitive behavior can cause trouble for our Company. Be mindful of situations that could lead to the appearance of questionable conduct, such as conversing with competitors at trade shows or conventions.



Competing with integrity also means we always gather competitive information ethically and legally. We never misrepresent ourselves in order to get information. In addition, we must never ask another company's former employees of our competitors – even if they now work for NextEra Energy – to share confidential information with us.

Q: Todd is excited to represent NextEra Energy at the Green Power convention this year. He has been with the Company for 10 years and is excited about all the progress being made in more environmentally friendly power resources. He knows that making strides in this area is the key to future success. For months now, Todd has served on a focus group, planning how to expand NextEra Energy's green energy efforts. When he arrives at the convention center, Todd can hardly believe that his college roommate is seated just two rows in front of him representing another green energy company. He thinks to himself, "I should ask Jeff to go to dinner after this is over. We can reminisce, catch up and maybe even brainstorm about what we hear today. This will be awesome."

A: Todd is correct that expanding green energy offerings is important to NextEra Energy. However, Todd is incorrect in thinking that talking to a competitor's employee about ideas and strategies is a good idea. While Todd is welcome to catch up on personal matters with his old buddy, he should not in any way talk about NextEra Energy customers, strategies, contracts or projects in development. Likewise, Todd should not ask Jeff any inappropriate questions in an attempt to get information about Jeff's company and its advances in green energy.

We Treat Our Customers and Suppliers Fairly

At NextEra Energy, we let integrity and honesty guide our interactions with our customers and our suppliers. We pride ourselves on the quality of our products, services and operations. We are honest about our work. We are committed to doing business with suppliers who provide goods and services that meet or exceed our high standards. In turn, we expect our contractors, consultants, suppliers and vendors (each a "Supplier" and collectively, the "Suppliers") to adhere to the terms of the NextEra Energy, Inc. Supplier Code of Conduct ("Code"). If you experience an issue with supplier performance, contact the Vice President, Integrated Supply Chain at once so that the issue may be addressed.

We do not make misleading, false or exaggerated claims about our services. We carefully and accurately represent the quality, features and availability of our products and services and ensure that all of our marketing and promotional materials contain an accurate discussion of our offerings.

We Protect Our Third Parties Information and Property

The third parties we work with – customers, suppliers, contractors, consultants and business partners – frequently share their confidential and IP information with NextEra Energy. We must protect that information just as carefully as we protect our own. In fact, our integrity depends on it. This helps create an environment of trust with our partners and ensures that NextEra Energy maintains its compliance with all data protection and privacy laws. Never disclose such information without ensuring that you have the authority to do so. If such disclosure is to a third party, also ensure that you have a signed nondisclosure agreement with that third party. Be especially careful when preparing advertising or promotional materials or when using the name or printed materials of another company. Materials subject to copyrights may not be used, posted on, copied or sent through our Company's systems without permission from the copyright holder.

Those of you who work on or around our customers' property have a special obligation. In the event that damage occurs while you are providing service to a customer, damage, if unavoidable, should be kept to a minimum and the property restored when the work is finished. For more information, refer to the Damage to Non-FPL Property policy.

Follow the same security measures for our third parties' confidential and IP information that you do for your own sensitive Company information.



Waivers

Our Company generally will not grant waivers. Any waiver of any provision of our Code for executive officers (as “officer” is defined in Rule 16(a)-1(f) under the Securities Exchange Act of 1934, as amended) or directors must be approved by the Board of Directors or a designated committee of the Board. Any such waiver must be promptly disclosed to shareholders in accordance with applicable New York Stock Exchange rules. Employees seeking a waiver to any provision of our Code should consult a Compliance Officer.

Adopted March 31, 2004. Most recently revised October 2022



NextEra Energy, Inc.
700 Universe Boulevard
Juno Beach, Florida 33408

For more information, go to:

NextEraEnergy.com

FPL.com

NextEraEnergyResources.com