



Supplier Code of Conduct

Excelerate Energy’s Commitment

Excelerate Energy’s (together with its subsidiaries, “**Excelerate**”) is committed to providing cleaner energy solutions across the world in a safe, responsible, and sustainable way. This Supplier Code of Conduct (“**Code**”) articulates our expectations of the conduct of suppliers and partners doing business with Excelerate (“**suppliers**”).

Our Guiding Principles

Excelerate’s core SAIL values serve as the foundation for how we conduct business.

These values are not only a way of life for Excelerate, but they reflect a commitment that is made every day by our employees and by Excelerate to its shareholders, business partners, consumers, customers, suppliers, and communities.



With respect to business conducted with or on behalf of Excelerate, while it is understood that our suppliers are independent third parties, as a condition of doing business, we nevertheless expect all such Suppliers to act in a manner consistent with our core SAIL values, this Code, and all applicable laws and regulations. Our Suppliers must adhere to this Code unless to do so would be a breach of applicable law.

Employment Practices and Human Rights

Excelerate strives to provide a professional work environment in which all individuals are treated with dignity and respect, and whose human rights are protected as set out in the United Nations’ Universal Declaration of Human Rights. We comply with all applicable laws and prohibit unlawful discrimination, harassment or retaliation against employees. Excelerate expects suppliers to adhere to the same standards.

Wages and Benefits

Suppliers should commit to compliance with all applicable laws regarding wages, work hours, overtime, benefits and other compensation matters.

Non-Discrimination

Suppliers shall not discriminate based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity, national or social origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status or any other characteristic protected by law in hiring and employment practices unless such distinction is required by local law.

Working Hours

Suppliers shall comply with local laws and collective bargaining agreements (where applicable) regarding working hours. Working hours must not exceed the maximum set by local law.

Forced Labor

Suppliers shall ensure that they do not engage (directly or indirectly) in any form of forced, bonded or compulsory labor, human trafficking, unlawful child labor or other non-voluntary labor.

Suppliers shall only employ workers who are legally entitled to work in the country. Suppliers shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting Supplier's company-provided facilities. Suppliers shall not withhold an employee's original identification or travel documents.

Freedom of Association and the Right to Collective Bargaining

Suppliers are expected to recognize the rights of its employees to form or join a union and engage in collective bargaining as permitted by the relevant applicable laws.

Health & Safety

[At Excelerate, we conduct our operations in a manner that does not jeopardize the health or safety of our employees or members of the communities in which we operate.](#)

Suppliers will:

- Conduct their operations in a manner that does not jeopardize the health or safety of their employees, Excelerate's employees, or members of the communities in which they operate.
- Provide a safe and secure workplace, including facilities and accommodations that apply with all applicable laws.
- Comply with all applicable health and safety laws and regulations and standards in the jurisdictions they are operating, and ensure that their employees and representatives work in conformance with applicable health and safety requirements and procedures.
- Ensure that all their employees and representatives have the right to refuse unsafe work and report unhealthy working conditions.
- Ensure that occupational exposure to potential safety hazards and emergency situations shall be controlled through proper design, risk assessment, engineering controls, safe work procedures, emergency plans and response procedures, and mandatory training.
- Implement a Health & Safety Management System, including accident and near accident reporting.

Environmental Stewardship

Excelerate is committed to environmental stewardship and reducing our operational footprint.

Environmental Responsibility

Suppliers will maintain an effective environmental policy and environmental management system that promotes environmental responsibility and enables continuous improvement of their environmental performance and impact.

Resource Efficiency

Suppliers will control and implement actions to reduce their use of energy, water, raw materials and packaging materials and should strive to reduce their reliance on fossil fuels.

Emissions and Waste Handling

Suppliers will control and implement actions to reduce emissions of air, water and waste of all types. Waste handling management for hazardous and non-hazardous materials must be developed and monitored.

Materials Compliance

Suppliers will ensure that the products delivered to Excelerate fulfill legal requirements, do not contain banned or restricted substances, and are accompanied by correct documentation

Business Integrity

As a responsible company, Excelerate seeks business relationships based on trust, transparency, and mutual accountability. In turn, we expect our Suppliers to share our commitment to acting ethically and following the law.

Accurate Financial Reporting

Suppliers will ensure that all business information and reporting activities are to be conducted honestly and accurately and comply with all applicable laws regarding their completion and accuracy.

Conflicts of Interest

Suppliers will avoid, and to report to Excelerate, any situation or circumstance that may appear to create a conflict of interest. Suppliers shall not use or attempt to use their relationship with Excelerate to obtain any improper benefit for the Supplier for their employees, family members or any other person.

Avoiding Improper Business Conduct

Suppliers will not offer, give or provide to, or accept from, any employee of Excelerate any gifts in excess of nominal value (including gifts of cash, gift cards or securities), or any entertainment or travel that is not appropriate, reasonable or customary. Suppliers are also expected to exercise caution and use good judgment when offering or accepting business courtesies (gifts of nominal value) to or from employees of Excelerate to ensure that giving or receiving such gifts does not create an appearance of any impropriety.

Suppliers will prohibit bribes, kickbacks, or other illegal efforts to obtain an improper business advantage on behalf of Excelerate.

Suppliers will never directly or indirectly promise, offer, pay, or authorize the giving of money or anything of value to or for the benefit of any public official or private individual, to inappropriately influence or to secure an improper advantage for Excelerate. For purposes of this Code, a public official is defined as:

- any officer or employee of a government;
- any officer or employee of a government instrumentality, which includes agencies and departments, as well as state-owned and state-controlled companies;
- any person acting in an official capacity for or on behalf of a government or its instrumentality;
- an official of a political party or a candidate for political office;
- an employee of a public international organization, such as the United Nations; and
- a close relative of any of the above.

Antitrust and Competition Laws

Suppliers will comply with applicable antitrust and fair competition laws and to not participate in any activity that could be considered a violation of such laws.

Protecting Confidential Information and Proper Use of Excelerate's Assets

Suppliers will protect and maintain the confidentiality of any Excelerate's information to which they have access, including intellectual property, trade secrets, customer information, business plans, salary or employee personal information and financial information. Intellectual property rights are to be respected, and transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

Suppliers will safeguard any property or assets belonging to Excelerate while under their control. Except as specifically authorized by Excelerate, Excelerate's property and equipment may only be used for our business. Any suspected incident of fraud, cybersecurity breach, or theft involving company data or property should be reported to Excelerate immediately.

Privacy

Suppliers will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with.

Compliance with this Code and Reporting Concerns

Suppliers will have a process to communicate the requirements of this Code through their supply chain and to require their own suppliers and contractors to adhere to the standards as set forth in this Code.

So that all suppliers have access to the latest version of this Code, the most recent update can be found on Excelerate Energy's external website at www.excelerateenergy.com.

Any suspected breach of this Code shall be immediately reported to a manager at Excelerate Energy or via our Ethics Hotline which can be found in the Contact section on Excelerate Energy's external website or accessible as follows:



www.reportlineweb.com/excelerateenergy

OR

Call toll-free: 1-888-736-2877

Contacting us quickly helps to prevent problems and correct any that have already occurred. We handle all reports promptly, fairly, and as confidential as possible.



Supplier Code of Conduct

Supplier Code of Conduct Acknowledgement

Please print this page, complete the box below, and return it to Excelsior Energy. Please retain a copy for your records.

I acknowledge, understand, accept, and agree to comply with the requirements stated in Excelsior Energy's Supplier Code of Conduct.

COMPANY: _____

NAME: _____

TITLE: _____

SIGNATURE: _____ DATE: _____