

**NextEra Energy, Inc.**  
**Code of Business Conduct & Ethics**

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## Letter from Our President and Chief Executive Officer

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Dear Colleague:

At NextEra Energy, we're all about getting better every day, in everything we do. All areas of the business are fair game, and a good example of that commitment is this document: our new NextEra Energy, Inc. Code of Business Conduct & Ethics.

This document hadn't been benchmarked against the best-in-class in several years, so last year we brought in some experts to help us do so. These experts had two observations. Substantively, our Code said what it needed to say. But structurally, our Code was not organized in a way that made it easy for our employees to use, and did not reflect some of the best practices that other large companies had pioneered. In the spirit of continuous improvement, our updated Code takes this counsel to heart.

So what's changed in our new Code?

We reorganized the entire document to reinforce NextEra Energy's three corporate values and aligned each subject in the Code to one of the values. To make the Code as practical as possible, we added links to corporate policies and procedures that supplement each section of the Code. We added learning aids such as real-life scenarios, Q&As and the like. We added information on social media and international trade laws to reflect two growing trends in our business. And as important as anything, we made the language easier to understand.

The new Code reflects a lot of hard work, but the next tasks belong to each of you. Read the Code, understand it and follow it. If you have questions, take the initiative to ask your supervisor, manager or any of the compliance officers listed in the Code. If you believe you have witnessed a violation – of this Code, any company policy, or the law – you have an obligation to report it. Your company, in turn, has a responsibility to protect you from any retaliation for reporting a suspected violation, and we will honor that responsibility to you. We also welcome your feedback on how we can improve our Code even further, and make it even easier to use.

As many of you have heard me say, we have a terrific company. We have terrific assets and growth prospects, and most of all we have terrific people. Our Code of Business Conduct & Ethics documents the commitments we make to each other as we continue to build the largest and best clean energy provider in the United States. Thank you for living up to those commitments.

Sincerely,

Jim Robo

President & CEO

NextEra Energy, Inc.

# Table of Contents

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- Letter from Our President and Chief Executive Officer ..... i**
- NextEra Energy Core Values ..... 1**
- Introduction: Doing Well by Doing Good ..... 2**
  - The Purpose of Our Code .....2
  - Who is Expected to Follow Our Code.....2
  - Ethical Responsibilities .....2
  - Personal Commitment .....3
  - Non-Retaliation Commitment .....5
  - Investigations and Consequences .....5
  - Legal Responsibilities .....5
- We Are Committed to Excellence ..... 6**
  - We Comply with FERC, NERC, and the PUCT.....6
  - We Maintain Accurate Records.....7
  - We Observe Securities Laws .....8
  - We Safeguard Company Assets and Information.....9
  - We Use Company Technologies Responsibly.....12
- We Do the Right Thing .....13**
  - We Protect the Environment .....13
  - We Avoid Conflict of Interest Situations .....14
  - We Exchange Business Courtesies Ethically .....16
  - We Do Not Resort to Corruption or Bribery.....17
  - We Comply with International Trade Laws .....18
  - We Give Back to Our Communities .....19
  - We Communicate Truthfully with the Public .....20
- We Treat People with Respect.....22**
  - We Value Our Fellow Employees .....22
  - We Compete with Integrity .....25
  - We Treat Our Customers and Suppliers Fairly .....26
  - We Protect Our Third Parties’ Information and Property.....26
- Waivers .....28**

## NextEra Energy Core Values

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### **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.

# Introduction: Doing Well by Doing Good

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## The Purpose of Our Code

As a NextEra Energy employee, you are empowered to help create a better future. This kind of power comes with stringent requirements, however – namely, those set for us by our core values, our Company policies, and the laws and regulations that govern our work. 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 may carry serious consequences for the individuals involved, as well as for NextEra Energy as a whole. Those engaging in unethical or illegal behavior, and those who direct, condone, approve, or facilitate such behavior, may be subject to legal action and disciplinary action up to and including termination. It is this sort of behavior that 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.

The requirements set forth in this *NextEra Energy, Inc. Code of Business Conduct & Ethics* help us maintain the accountability and integrity required by our work. 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 tools 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 the Code. You must also 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.

## 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 the Code can help by providing you with 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:

- Which option represents the best legal and ethical course of action?
- Which choice is the most honest one?
- How will others be affected by the decision?

- Are my actions unsafe? Do they present *any* risk of endangering myself or others?
- How would the action and its outcome be perceived by a family member, colleague or members of the community?

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 and 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 the Code. In this respect, managers should also:

- Lead by example and ensure all employees are aware of and abide by this 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 ongoing 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

Managers must also ensure that no retaliation occurs against a NextEra Energy employee who in good faith raises concerns or reports violations of the 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 interaction.

## **Personal Commitment**

NextEra Energy believes that asking questions and reporting 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, provided that you always act in good faith. Since this Code cannot possibly address every situation you may face, it is up to each of you 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

- The head of your business unit
- Human Resources
- Internal Audit
- A Compliance Officer
  - Alissa E. Ballot, Vice President & Corporate Secretary
  - Maria V. Fogarty, Senior Vice President, Internal Audit & Compliance
  - Charles E. Sieving, Executive Vice President & General Counsel
- The Code of Business Conduct & Ethics Hotline
  - 888.906.9NEE (888.906.9633)
  - <https://nee.alertline.com>
- Nuclear Safety Employee Concerns Hotline
  - 800.645.5105
- Equal Employment Opportunity Hotline
  - 888.552.1055
  - Or complete a discriminatory/harassment reporting form, which can be found on eWeb under My HR Direct, HR Policies, All HR Forms
- Corporate Security
  - 561.694.5000
  - <http://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 this Code, Company policy or the law. You are strongly encouraged to identify yourself when making a report so that the Company is able to 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 policy or the principles embodied by either, 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.

## **Investigations and Consequences**

NextEra Energy strives to apply consistent principles when conducting investigations. When a report is made through one of the Hotlines, the information is forwarded to the proper resource for investigation. Our Company will promptly, discreetly, and professionally follow up on any indication of a breach of the law or this Code. 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.

## **Legal Responsibilities**

Regardless of title, position or tenure, you have a duty to know and strictly follow this 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 they are in or outside of the United States. Where you are unclear about the meaning or importance of a section of this Code, you should not hesitate to ask questions. You must certify, on an annual basis, that you have read and understand our Code.

## **We Are Committed to Excellence**

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### **We Comply with FERC, NERC, and the PUCT**

#### **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 gas in interstate commerce. FERC requirements are described more fully in the following sections.

#### **FERC Standards of Conduct**

FERC's Standards of Conduct require that some Florida Power & Light Company (FPL) transmission employees work independently from the FPL energy marketing employees who sell energy or transmission for FPL. FERC's Standards of Conduct are intended to prevent FPL's energy marketing group from gaining an unfair advantage by acquiring certain non-public transmission information. The FPL energy marketing employees cannot have access to, or receive, FPL's non-public transmission information. Any such sharing of information requires immediate disclosure to the public.

#### **FERC Affiliate Restrictions**

As a NextEra Energy employee, you must not share market information from FPL to our affiliated companies, such as NextEra Energy's NextEra Energy Resources (NEER) affiliates, that could harm FPL's customers.

FERC's Affiliate Restrictions are intended to make sure there is no preferential treatment or unfair advantage given from FPL to our affiliated companies, such as NEER affiliates, that sell electricity at market-based rates. Employees of these groups must operate separately unless they are employees who provide shared services, in which case market information must not be shared with NEER that could harm FPL's customers.

#### **FERC Cross-Subsidization rules**

The Cross-Subsidization rules are intended to prevent FPL 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 uphold the Cross-Subsidization rules that apply to your job.

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

### **Public Utility Commission of Texas (PUCT)**

In Texas, the PUCT is the regulatory authority for the transmission of electricity and wholesale energy markets. The PUCT requires regulated transmission entities to operate independently from competitive affiliates in Texas and prohibits them from sharing non-public information. You are responsible for making sure that you understand and implement the PUCT requirements that apply to your job.

For more guidance on FERC, NERC, and the PUCT, visit the compliance website or contact the Senior Vice President of Internal Audit & Compliance.

### **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 of our financial statements in accordance with generally accepted accounting principles and properly represent the 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 (verbally 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 this Code. Our Company has adopted a separate policy which specifies additional procedures and protections for concerns and complaints involving material accounting irregularities. If you would like to review a copy of this policy, please contact a Compliance Officer.

### **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 the 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).

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.

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 and agency investigations. 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 Laws**

In the course of your work, you may become aware of information about our Company (or other companies) before the general public hears about it. It is important that you never disclose, or use for your personal benefit, any material, non-public (or “inside”) information you 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. Alternatively, you might not think of information as “public” until after the close of business on the first trading day following the date of public disclosure of the information.

Some examples of non-public information may include:

- Financial results and earnings forecasts
- Significant changes in earnings patterns
- Merger, acquisition, or tender offer discussions
- Significant rate, pricing, or demand changes
- Development of a significant new product or process
- The gain or loss of a significant customer or contract

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 (FD) under the Securities and Exchange Act of 1934. 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 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.

The laws, regulations, and rules around our commodity marketing and trading businesses are complex. Those of us involved in these activities must 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. If you have questions about commodity marketing and trading activities, direct them to your supervisor or the Law Department.

If your job includes activities related to any of the above, you and your supervisor must understand your obligations under the rules and complete all applicable training.

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Q: Julian goes to lunch with his supervisor Deanna a couple of times a month. Sometimes these lunches are purely a break from the office; other times, they turn into impromptu business meetings. Deanna has been particularly stressed lately and, at their most recent lunch, she lets Julian know that she's been working extra hours in preparation for a potential new acquisition. This is the first time Julian has heard of this. How should he handle this news?

A: It's likely that Julian did not know about the pending acquisition because he didn't have a business need to – it simply is not part of his job to have this kind of inside information. If this is the case, Deanna should not have told him about it. However, mistakes happen, and it's important for both Julian and Deanna to take the appropriate steps to protect this information. For Julian's part, he should not share this information with anyone inside or outside of the Company. He should also not trade in NextEra Energy stock until this information has been made public. As for Deanna, she should let the Law Department know that she mistakenly shared inside information with another employee. They can assist her in appropriately protecting the news until it becomes public knowledge.

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## **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 be used appropriately and responsibly at all times. You should avoid leaving any devices or technologies where they could be lost or stolen.

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

### **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. What is considered confidential information may depend on the company involved – FPL versus NEER, for example. You are expected to understand the types of information considered to be confidential for the company with which you work. Broadly speaking, 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

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 *System Access Confidentiality* policy, the *System Password* policy, and the *Corporate Privacy* policy.

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Q: Jordan has been working remotely for nearly a week and, after conferences, meetings, and business dinners, she is preparing to return home. While printing out her boarding pass in the hotel’s business center, she takes an important call from her boss, who wants to discuss the potential development of several new solar plants. During the conversation, Jordan cites a number of issues that cropped up during the last development phase, reinforcing the need for new controls, which she also outlines. As she proceeds to give a detailed account to her boss, she notices that a representative from a competitor she’d met at an earlier conference is at the printer – and he’s likely heard everything. What should Jordan do?

A: Jordan is in a difficult position, and it’s important for her to proceed carefully. First, she needs to end her call immediately so that she can finish up in the hotel business center without the risk of being overheard. She should only contact her boss again once she is in a private area – such as her room – where she doesn’t run the risk of being overheard. She’ll need to discuss the situation immediately with her supervisor in order to properly document the possible leak of confidential information and ensure that it’s handled properly. In situations like Jordan’s, it’s important to keep in mind that no matter how busy you are, nothing is so important that confidential Company information should be compromised in the process.

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## **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 verbally, 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. The rights to all IP created with Company materials, on Company time, at the Company’s expense, or within the scope of your duties belong to NextEra Energy.

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

## **We Use Company Technologies Responsibly**

We often draft emails, instant messages, and text messages on Company-provided technologies. 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. To help protect confidential business and personal information, do not respond to any emails that appear suspicious or click on any links or attachments embedded in these types of emails. If you receive a suspicious email, please forward it to Spam\_Email@fpl.com. 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.

For more information, refer to the *Electronic Communications* policy, the *Software on FPL Computer Systems* policy, *Information Management* policies, or refer to the Information Security website on eWeb.

## We Do the Right Thing

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### 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 and day-to-day work activities. 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.

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Q: Carlos is working at a power plant. He and his teammates have received extensive training on environmental rules, permit requirements, and how to minimize the impact their work has on the surrounding environment. At the end of his shift one day, Carlos notices oil on the ground next to a barrel. It looks like someone intentionally tried to cover up the spill with dirt. He knows his team was particularly pressed for time that day and does not want to get anyone in trouble. However, he is worried about the effect this spill could have on the environment. He also knows from his training that there may be a requirement to report this type of spill. What should he do?

A: At NextEra Energy, we are committed to doing what is right for the environment at all times. 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. Carlos 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.

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## **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 bias in your decisions.

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 engaging in this potential conflict situation. For more information, refer to the *Conflict of Interest* policy.

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.

### **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. A *related person* includes 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.

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.

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.

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Q: Rhonda and her sister, Marianne, have shared everything since childhood. They had the same friends, the same clothes, and even attended the same undergraduate program. Now, they work for competing companies - Rhonda for NextEra Energy and Marianne for another energy provider. Rhonda has been very successful in her career, but her sister has struggled. Rhonda desperately wants to help. She learns of a prospective landowner interested in hosting wind turbines and decides to point her sister to the lead, hoping it can generate some business for Marianne's own company. Rhonda still plans to pursue the opportunity for our Company, but thinks it can't hurt to help her sister. May the best company win, right?

A: Wrong. If NextEra Energy identifies or is approached by a landowner, we must capitalize on the opportunity. Encouraging our competitors to pursue our leads is counterproductive to our business goals, and could end in lost profits for the Company as a whole. It's understandable that Rhonda would want to help her struggling sister; however, she cannot do so at the expense of NextEra Energy.

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## Holding significant outside financial interests

Having a substantial investment in or 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 percent 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 our loyalties are actually divided. Likewise, you may not engage in any transaction involving NextEra Energy if you, or a related person, has a substantial interest in the transaction or can benefit directly or indirectly, 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.

## **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 upstanding 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.

“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.

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

You may attend the occasional meal or entertainment provided that the event is customary and reasonable and both the provider and recipient are present. When offered travel or lodging, you may not accept unless approved in advance by your business unit vice president.

Even if you receive gifts that meet the criteria above, you must always remember to do nothing that could create even the appearance of bias. 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.

If you are offered money or a gift that is not in line with the exceptions listed above, you must report it to your supervisor, as well as a Compliance Officer, in writing. The same rules apply if money or gifts are sent to your office or home address. The Compliance Officer will provide guidance as to the next steps.

For more information, refer to the *Gifts, Meals and Entertainment* policy.

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.

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**Q:** Jarrett, an employee of NextEra Energy, has worked with one of NextEra Energy’s vendors over the past several years. To thank Jarrett for his help with a recent contract, the vendor has invited Jarrett to be the vendor’s guest at a charity dinner. The vendor has a table reserved for corporate guests. Jarrett would be part of the group at the vendor’s table. Jarrett thinks this is a great way to maintain the relationship with the vendor. Is this situation acceptable?

**A:** Jarrett will be attending the charity dinner along with other corporate guests, so the invitation would not be viewed as an attempt to influence Jarrett’s behavior toward the vendor or unfairly retain the vendor’s business. Since representatives of the vendor will be present at the dinner, Jarrett would have the opportunity to strengthen his relationship with the vendor. NextEra Energy would consider it acceptable for Jarrett to attend the event.

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## **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. This means you may not offer, attempt to offer, authorize, or promise any sort of bribe or kickback for the purpose of obtaining or retaining business or an unfair advantage. Moreover, you may not solicit or accept a bribe or kickback.

To be clear, a *kickback* is the return of a sum already paid or due to be paid as a reward for awarding or fostering business. 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. Bribes may include:

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

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. A *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. Because the money goes straight to the individual, however, facilitating payments are bribes, and it is against our policy to pay them. You must never solicit, request, or knowingly condone any payments from a third party to a government official on behalf of our Company.

If you are working with a government official, be especially cautious. A *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. Engaging a third party to indirectly make an improper payment violates not only this Code, but also anti-corruption laws. Before you engage a third party that is anticipated to work with foreign government officials on your behalf, you must complete the *Request to Engage an International Business Party* form.

Anti-corruption laws are complex, and the consequences for violating these laws are severe. For this reason, you should avoid any activity that could be construed as bribery. If you have any questions, consult with a Compliance Officer.

For more information about this section, refer to the *International Anti-Bribery Policy and Procedures*.

## **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 Law Department.

## **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 the Company, so long as both the charity and/or the activity have been approved. You may not, however, use Company assets to raise money or awareness for an unapproved charity or any other fundraiser, unless it has been pre-approved. For FPL approval, contact the vice president of development & 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.

The same rules apply to your participation in political activities. You have the right – and are even encouraged – 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 work day 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, 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

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. Therefore, as described earlier in this Code, 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. Any contributions of corporate funds or other assets must promote the interests of our Company and be made without regard for private political preferences.

There are many resources available to answer questions about our Company’s policies on political activities. Please see the following table to help determine the best point of contact for your situation.

<b>For:</b>	<b>Contact:</b>
U.S. federal political matters	vice president, governmental 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

**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 or another interested party, you should refer the inquiry to your supervisor and the vice president of marketing & communication. For investor inquiries, 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.

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. However, only specified individuals may post to social media on NextEra Energy's behalf. When you use social media for Company purposes, you must follow all Company policies and clearly disclose your affiliation with NextEra Energy. When you use social media for personal purposes, you should not post on NextEra Energy's behalf.

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](http://eWeb.fpl.com/brands/templates/epr_guidelines.pdf)

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Q: Gina has worked for NextEra Energy for several years. She has worked in a couple of different areas of the Company, and has learned a lot about the business. Recently, a Facebook friend of hers posted an article about our Company, and Gina was quick to respond with her opinions as an employee. She also refuted a few of the points the article made, citing her experience and knowledge of our Company's procedures. While Gina is enthusiastic about the work that we do and enjoys working for the Company, representing NextEra Energy online is not one of her job responsibilities. How should she be conducting herself in these situations?

A: It is important that, despite her personal feelings, Gina avoids speaking on behalf of the Company or divulging information online that might be sensitive or confidential. If she identifies herself online as a NextEra Energy employee, she should also make clear that any opinions or ideas she posts are her own - not those of the Company. Although Gina's comments are positive, taking a stance on issues related to our Company or making comments about our business can be viewed as an authorized attempt to represent NextEra Energy. This can lead to confusion and misinformation for everyone involved.

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## **We Treat People with Respect**

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### **We Value Our Fellow Employees**

You have an important role in building and sustaining an inclusive, diverse work environment. To succeed in this, you must show respect for various backgrounds, ideas, and experiences. Therefore, we want to assure that every one of you 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 on the basis of 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. Harassment is any verbal remark, physical advance, or visual display that makes another feel intimidated, offended, or belittled. 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 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, HR, the Manager of Diversity and Inclusion, or call the Employee Relations Hotline at 888.552.1055 immediately.

For more information, please see the policies on *My HR Direct*.

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Q: Sierra was adopted at eight months of age. Although born in China, she was adopted by U.S. citizens and has lived her entire life in America. Her speech and habits closely resemble the friends she grew up with in Pennsylvania. She works in marketing for NextEra Energy and enjoys her job. There is, however, one co-worker who is not enjoyable. Mark, another member of her team, thinks of himself as a comedian. When he sees her coming, rather than giving her a polite greeting, he speaks to her in broken English, imitating old Kung-Fu movies. He thinks his behavior is hilarious, but Sierra finds it humiliating. She has never been one to create drama, but part of her thinks she should tell her manager about how uncomfortable these jokes make her feel.

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

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## **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.

"Sensitive employee information" may include: benefits, tax or compensation information, medical records, contact information, and employee information such as resume, transcript, performance evaluation materials, or interview notes.

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.

## **Workplace health and safety**

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.

To accomplish our safety goals, you should 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. For instance, 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, the Company is committed to the highest standards of nuclear safety in the design, operation, and maintenance of our nuclear power plants. You are required to bring to the attention of management any concerns about the safety of design, operation, or maintenance of our nuclear 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* policy.

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 Information Management System (SIMS) – 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 the 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.

Additionally, if you are arrested, charged, or indicted for the commission of, or participating in, a felony or misdemeanor (including criminal traffic violations) either on or off duty, you must inform Corporate Security at 561.694.5000 within 24 hours of the arrest, or within 24 hours of release from jail if incarcerated as a result of an arrest, or prior to the start of your next scheduled shift or work day, whichever is earlier.

For additional information about this section, consult the *Controlled Substances and Alcohol Abuse* policy on My HR Direct and the multiple *Safety and Security* policies that are available to you.

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Q: Jermaine drives a Company vehicle. One morning, he leaves his house late and is running behind in getting to his first site. While driving, he gets a text from his manager, asking a question about the morning's work. He knows his manager thinks he has parked and has begun working, making it easy for Jermaine to text an answer. Not responding will tip his manager that he is behind schedule and not on task. 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. If Jermaine is near his assigned work site, he should wait to park the car before texting.

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## **We Compete with Integrity**

At NextEra Energy, we believe in competing vigorously, but we never sacrifice our integrity to win business. This means we comply with all applicable antitrust and competition laws, wherever we do business. While they can be 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 fraudulent 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 questionable conduct, such as 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 the former employees of our competitors - even if they now work for NextEra Energy - to share confidential data with us.

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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.

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## **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. 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 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.

Follow the same security measures for our third parties' confidential and IP information that you do for your own sensitive Company information. Never disclose such information without ensuring that you have the authority to do so, and if such disclosure is to another third party, also ensure that you have a signed nondisclosure agreement with that other third party. Be especially careful when preparing advertising or promotional materials or when using the name or printed materials of another company. Materials belonging to others may not be used, posted on, copied, or sent through the 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 is incurred 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.

## Waivers

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The Company generally will not grant waivers. Any waiver of any provision of this 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 this Code should consult a Compliance Officer.

Adopted March 31, 2004. Most recently revised May 24, 2013.