

IMPROPER PAYMENTS PREVENTION POLICY



GE Vernova conducts all business transactions in an honest, fair and ethical manner. GE Vernova prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.

To comply with anti-bribery laws, GE Vernova's policy addresses three core expectations:

- Prohibition of bribery of any kind,
- Maintenance of strong internal controls aimed at preventing and detecting bribery, and
- Maintenance of accurate books and records that correctly reflect the true nature of all transactions

GE Vernova complies with all anti-bribery laws in the countries where our businesses operate.

WHAT TO KNOW

- Bribery means giving, offering or promising anything of value to gain an improper business advantage.
- An improper payment (also known as a bribe) to gain advantage in any business situation is never acceptable and exposes you and GE Vernova to possible criminal prosecution.
- Improper payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and customer travel and living expenses directly related to the promotion of GE products or services, or the execution of a contract (e.g., training on GE Vernova equipment at a GE Vernova site). These are usually acceptable. Consult the [GE Vernova Business Courtesies Procedure](#) for further guidance.
- This policy applies to all GE Vernova employees. Contractors and third parties with whom we do business must agree to abide by our policy (e.g., suppliers, channel partners, consortium partners and JV partners).

HOW TO COMPLY

- Do not engage in bribery or corruption of any kind.
- Never offer, promise, make, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- Before providing a business courtesy (e.g., gift, meal, entertainment, travel, charitable contribution or sponsorship) to an external party, consult the [GE Vernova Business Courtesies Procedure](#) to understand the rules that apply.

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- Do not make facilitation payments to speed up routine administrative actions (e.g., visas, permits, certifications, customs clearances, among others). These are generally prohibited (and often violate local law). Our goal is to eliminate all facilitation payments, with the only exception being if it is necessary to protect the health or safety of you or another employee. If the health and safety of you or a colleague is at risk, notify [compliance](#) immediately after the event.
- Keep accurate books, records and accounts that accurately and fairly reflect all transactions and/or payments.
- Follow your business due diligence procedures and require that any third party that (1) represents GE Vernova in promoting, marketing, and/or selling GE Vernova products to potential customers or (2) works with GE Vernova in the sale of GE Vernova products to potential customers, is carefully selected and is reviewed in a manner that complies with this policy.
- Follow the appropriate due diligence procedures in your business that relate to supplier selection and onboarding.
- Watch out for the following red flags, and notify your [Business Compliance Leader](#) if you encounter any of the below situations:
 - Unusual payment requests from third parties (such as up-front payments, abnormal commissions or price discounts, payments in third countries, payments to individuals, mid-stream requests for additional compensation)
 - Any suggestion to direct GE Vernova business through a specific representative or partner due to a “special relationship.”
 - Requests from the customer or third parties for political or charitable contributions, sponsorships, donations grants, or financing support of unrelated business interests
 - Familial or other relationships with customers or government officials that could improperly influence the decision of a customer or government official
 - Requests to keep a relationship or a transaction secret

GET HELP

- Immediately report any activity that is not consistent with this policy to your [Business Compliance leader](#). You can also raise an integrity concern through our [Open Reporting channels](#).
- Consult the [GE Vernova Business Courtesies Procedure](#) to learn about the different types of business courtesies and the rules that apply.
- Consult the [Hiring for the Government Implementing Procedure](#) on how to approach the hiring process of a current or former government employee.

THE SPIRIT & THE LETTER

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GE VERNOVA

- Follow GE Vernova's [Political Contributions](#) and [Lobbying](#) policies.

PENALTIES FOR VIOLATION

Employees who violate the spirit or the letter of GE Vernova's policies are subject to disciplinary action up to and including termination of employment if allowed under applicable law. In addition, if laws are violated, employees or the Company may be subject to criminal penalties (fines or jail time) or civil sanctions (damage awards or fines). GE Vernova could also lose government contracting privileges and export privileges.