

# Code of Conduct - NRG Argentina SA

## 1-Message from the CEO

Dear co-workers,

This code of conduct aims to make clear our purpose, principles and way of performing our daily tasks. Here we state NRG's commitment to build an organizational culture where the best practices in ethics, integrity, compliance with laws and transparency are implemented.

It is the responsible behavior of each of us that will contribute to conducting business in the right way, creating value for all stakeholders while strengthening the credibility and hence the good reputation of the organization.

I hope I can count on your commitment.

César Guercio

## 2-Scope of application

All persons within NRG (regardless of hierarchy level and specialty) and related companies must comply with this code of conduct.

The code does not cover all situations that may arise within the organization, but it does establish clear guidelines of conduct. Nor does it replace the application of common sense and good judgment in the performance of actions.

Compliance with the code of conduct and related policies is a necessary condition to continue the working relationship with NRG Argentina S.A.

## 3-Purpose and principles

### Our purpose

At NRG, we face the challenges of the future: we seek to contribute to the responsible development of the energy that people use every day.





## **What we do**

We offer the oil and gas industry strategic inputs: natural sand and synthetic proppants in the quantities and times demanded by the operation, which will contribute to achieving successful results in the country's energy development.

## **How we do it**

By putting our principles into action, day after day.

### **- Execution with excellence**

We obtain ambitious business results based on clear objectives that are translated into concrete actions carried out in the expected time and manner. We take responsibility for our decisions and actions seeking to be consistent and reliable. We improve our execution capacity in the face of each new challenge, creating value for shareholders, customers and suppliers.

### **- Safety**

We promote a strict incident prevention approach, giving the highest priority to the health and safety of our employees. We protect our assets and those of third parties with whom we work. We disseminate and raise awareness of the care and precautions to be taken both in and outside of operations. We also care for the safety and well-being of the surroundings in which we operate and are responsible towards the environment.

### **- Collaboration**

We create bonds of trust both internally and externally. We work as a team towards a common goal. Honesty and ethics guide our actions: our words match our actions. We understand and give a place to the external environment, developing networking and solid relationships with the different stakeholders.

### **- Agile learning and continuous improvement**

We incorporate knowledge and experience both through training and at the workplace, transforming them into clear internal processes that contribute to the competitiveness of the organization. We generate an agile environment that enables the implementation of the best techniques and tools for the evolution of motivated and committed work teams, which will thus get the value contribution required for the growth of business results.

### **- Diversity and inclusion**

We are an organization that establishes bonds of respect. This comes first and is non-negotiable. We include diverse and

authentic talents, and embrace different types of stories, knowledge, experiences and attitudes that result in the coexistence of diversity and singularity. We manage and integrate different views in a safe and wellbeing framework. This includes our collaborators, clients and suppliers.

These principles should guide behavior within the organization, at all hierarchical levels, and also in relation to our stakeholders: shareholders, customers, suppliers, neighboring communities and society in general.

### **3- ESG Strategy**

The environmental, social and governance (ESG) strategy reflects the company's ethical and responsible behavior. We include these aspects, explicitly and systematically, as part of our investment analysis and business decision making. Actions taken by NRG members must take into account this integrative approach.

### **4-Behaviour Guidelines**

Show integrity and accountability in all instances

We know and abide by the laws that apply to our industry and we do not engage in actions unless we are certain they are ethical and legal. Doing so encompasses not only ensuring compliance with laws and regulations, but it also involves recognizing that our decisions affect others. With this in mind, we not only gain the respect and trust of our customers, suppliers and shareholders, but also that of the communities within our operations' area of influence.

We are all individually responsible for adhering to this Code of Conduct and the internal requirements that govern our work. The application of this code is non-delegable and its infringement cannot be justified by ignorance or by instructions received to the contrary from any level of the hierarchy.

If we intentionally or unintentionally infringe applicable rules, regulations or laws, we may be subject to disciplinary action. We may also face personal financial or criminal liability. At NRG, we adopt progressive accountability guidelines as a fair and consistent system for evaluating the actions of individuals who



infringe the rules. Any deviations or exceptions to the rules of the code of conduct must be reported to company authorities.

#### Report a concern or code infringement

If we learn about or suspect an infringement of the code of conduct or applicable laws, we must report it internally. The first contact point is the direct or functional manager. If this is not possible, we can contact the Human Resources, Legal, Financial Manager, or other managerial position within the NRG structure. Any employee who fails to report an infringement of the codes of conduct or the law will be subject to disciplinary action.

#### No retaliation

We ask questions and raise concerns when problems arise and report internally any actual or potential infringements of applicable rules and laws, without fear of retaliation. NRG encourages good faith reporting of potential or actual infringements of any internal requirements. However, any employee who intentionally reports false information will be subject to disciplinary action.

#### Commitment to customers

At NRG, we are committed to providing products and services of excellence to our customers. We establish consistent, reliable and transparent relationships with them, being aware of the importance of our work for the achievement of their objectives in due time and proper manner.

We believe that, to achieve the highest competitive standards of products and services, we must orient all of our actions with a focus on the customer.

#### Dealing with suppliers

At NRG, we have zero tolerance for corruption of any kind. We expect the same attitude from our contractors, suppliers and agents. All of them must comply with the laws of the countries in which they operate and act in a socially responsible and ethical manner, in accordance with NRG's codes of conduct. All contractors, suppliers and agents must be selected, approved and managed in accordance with internal requirements. We support the responsible sourcing of materials from suppliers who share our



values, giving preference to those that have active and verifiable ESG policies.

## **5-Health, safety and environmental protection**

### Health and safety at work

A safe and productive work environment is one that is free from the harmful effects of controlled substances, alcohol, and legal or illegal drugs. We are not allowed to enter NRG facilities, conducting company business, and driving or operating machinery or equipment while under the influence of alcohol, drugs or controlled substances.

We must be proactive as regards our safety and that of our co-workers. We must use the personal protective equipment required for each job. We do not perform a task without proper training. We stop any work at any time if conditions are unsafe and immediately report any unsafe behavior to a supervisor.

Driving is the riskiest activity at NRG. All employees whose jobs involve driving must comply with specific safe driving requirements. At NRG, we require that all vehicle passengers wear their seat belts.

Driving under the influence of drugs or alcohol is not allowed. The use of mobile phones or electronic devices while driving is not allowed, even if they are on hands-free. The driver must bring the vehicle to a complete stop at a safe place before using any device.

### Protection of the environment

At NRG, we comply with applicable environmental laws and we are committed to minimizing the impact that our actions generate on the environment. We do so by preventing pollution, minimizing the carbon footprint of all our operations, consuming fewer natural resources and minimizing waste.

At NRG, we implement continuous improvements in our environmental standards at all our facilities and in all aspects of the business.





## **6-Quality and excellence**

Our success as a company will depend on providing reliable services to our customers and on continuous improvement applied to the quality of our products. We are committed to always getting the job done in due time and manner. We show our commitment to quality by meeting or exceeding customer expectations and avoiding nonconformities in our daily activities.

We participate in periodic audits and assessments which help us make continuous quality improvements. We also value our customers' comments and incorporate them into our processes.

## **7-Avoiding conflicts of interest**

Conflicts may arise if we have personal, social, financial, political or other interests that may interfere with our responsibilities as NRG employees. For example:

- If we have an active interest in an organization that does business with NRG, including customers or suppliers.
- If a family member works at an organization that competes with NRG.
- If an employee is a director, officer, agent or consultant of a company that competes with NRG.
- If the company provides a personal loan to an employee.

We must put NRG's business interests first and refrain from accepting improper personal benefits as a result of our position. We will report potential conflicts of interest to our supervisor. We will request prior written approval before an employee may continue to work while a conflict of interest exists.

## **8-Confidentiality**

We must ensure that non-public or privileged information to which we have access because of our work functions at NRG remains confidential. New product launches, unannounced marketing plans, financial results, changes in dividends or earnings, planned mergers or acquisitions and business strategies are some examples of information to be kept confidential. If we access such information, we must maintain confidentiality and cannot buy or sell any listed NRG stock or options until the information becomes public.

It is illegal to provide nonpublic information to another person for him/her to buy or sell stock or other securities, even if we do not make a financial profit from it. This prohibition also applies to the purchase and sale of shares or options in other companies with which NRG does business.

### **9-Good judgment regarding gifts**

Accepting or giving business gifts or hospitality should never suggest an ability to influence business decisions. Gifts are items or benefits for which the recipient does not pay a fair market value. Hospitality includes meals, entertainment and sporting events.

We must not offer or accept any gift or hospitality of nominal value higher than USD 150 from any individual or organization doing or seeking to do business with NRG. We must return any gift or hospitality exceeding such amount. If we are unable to return the gift or hospitality, we must ask our supervisor. It is also important to inquire if we are unsure if a particular gift is appropriate.

We acknowledge and respect our clients' policies in this regard.



### **10-Fair and open trading practices**

Bribery and corruption

We do not obtain a commercial advantage through bribes, improper payments or any other illegal means. At NRG, we have zero tolerance for corruption. The direct or indirect offer, payment, solicitation or acceptance of bribes in any form is prohibited.

We must never give or receive any kind of bribe or hidden payment to:

- Influence someone's judgment about our products and services
- Obtain an improper advantage when selling our goods and services
- Influence the use of discretionary authority by a government official

## Government officials

Payments to government officials are prohibited. This term includes officials or employees of any branch of government and their family members. It also applies to election campaigns, political candidates, and employees of any corporation owned or controlled by the government, including national oil companies.

Direct payments are prohibited, as are payment offers, payments made through third parties (such as agents) and reimbursements of payments that we or someone else may have made personally.

## Political activities and public policies

NRG is politically neutral and does not make political contributions. We do not use company funds or assets for political purposes.

As regards public policy issues, we can engage in direct dialogue with decision makers, but we do not use pressure groups or seek to achieve a particular outcome or decision.



## **11-Fair and ethical competition**

At NRG, we compete aggressively but fairly. We do not win business or maintain customer relationships by acting illegally or unethically. We must deal fairly and openly with customers, suppliers and competitors.

We do not take advantage of a business situation by misusing confidential information, misrepresenting facts or doing anything else that might be considered unfair.

Any type of agreement or understanding with our competitors to restrict fair competition is prohibited. This means that we cannot enter into agreements that set or control prices, allocate products, markets or territories; or limit the manufacture, sale or production of any product or the provision of any service.

Whenever we participate in activities or partnerships where there is communication between competitors, customers or suppliers, we must pay particular attention to ethical and legal requirements.

We do not share information about prices or offers with anyone outside of NRG.





## **12-Diversity and Inclusion**

As a company, we promote fair labor practices and offer equal opportunities to all our employees. We do not engage in or accept discrimination of any kind in hiring and employment practices, as well as in promotions, rewards and access to training.

We expect NRG employees to treat each other professionally, with mutual respect. We also expect professional and respectful treatment towards customers, contractors and anyone connected with or affected by our operations.

At NRG we do not tolerate any form of harassment, offensive action or abuse of power.

## **13-Development of regional economies and community**

We promote responsible economic development by recruiting, hiring and providing training at the sites where we operate, complying with international labor standards and local laws.

In addition, we contribute to the social development and wellbeing of these communities by supporting initiatives aimed at improving the education of young people and living conditions.

We prohibit any direct or indirect use or hiring of slavery, human trafficking, child labor or any form of forced labor.

At NRG, we respect the principles of the Universal Declaration of Human Rights and are committed to conducting business in a manner that preserves and respects human dignity.

## **14-Migration laws**

The company's business involves both national and international movement of employees. We must ensure that the movement, employment and residency of all personnel comply with applicable immigration and employment laws. This requirement extends to our employees' dependents and contractors' personnel.

At NRG, we have migration and visa compliance programs to collaborate in these processes, but each person is responsible for complying with the appropriate procedures required by their

migration and employment situation in the countries where they work and live.

### **15-Trade control compliance**

At NRG, we can purchase or offer products and services in various countries of the world, which have customs laws and trade controls that govern the import, temporary import, export or re-export of products, services and technology. We must comply with all trade control laws and regulations applicable to the company, wherever we do business.

We review the compliance of all shipments or receipts before proceeding with transactions.

We expect all employees to consult a trade control compliance expert about any questionable imports or exports.

### **16-Privacy and protection of data and information**

Personal information should be collected only for lawful business purposes. At NRG, we are committed to safeguarding and respecting the privacy of the personal information of any employee or third party that we may process. We keep records as required by applicable regulations.

Internal data privacy requirements guide the collection, use, transfer (including transfers across international borders), disclosure and security of such data. These requirements also describe our expectations for third parties processing our data.

The transfer of employee data to third parties located in countries not having adequate levels of personal data protection will be more strictly regulated.

As far as NRG employees are concerned, we must keep in mind that we represent the company every time we are identified as an employee or affiliate. Whatever we may publish externally will have an impact on the company as a whole. Any content/comments we post on social networks, or comments we make at conferences or events must be consistent with the way we are expected to present ourselves to customers and colleagues.



Employees must refrain from discussing NRG's business or confidential information on websites, social networks or anywhere else outside the company.

The provision of information to the media is the responsibility of the Communications and Institutional Relations Management, therefore only persons designated by this Management may make comments, whether officially or unofficially, or provide material for publication. This includes any interaction with the media, whether formal or informal and regardless of the subject matter involved.

## **17-Confidentiality and information security**

We must protect information, regardless of whether it belongs to NRG or to others, such as our customers, who have entrusted it to us. We may obtain confidential and/or commercial information from a customer or while performing our job. Confidential information appears in different forms: in conversations, on paper, or by electronic means. Examples of confidential information include, but are not limited to: tool design, production plans, sales or acquisitions, marketing, customer reservation data, information stored in the corporate directory, employees' persona data and financial operating results.

Accidental disclosure of confidential information can be as damaging as intentional disclosure. If we have access to information that is commercially sensitive or confidential, we may not disclose it to unauthorized persons either inside or outside NRG, without first obtaining the necessary approvals. We need to be particularly cautious about what we, and our family members, say or do in our daily interactions with customers and other business partners in social settings.

We must be careful when using computers, software and data management to avoid accidental disclosure of confidential information. We protect company electronic and other data devices from theft and damage.

We must all obtain the appropriate administrative authorization to access company facilities, including buildings, equipment and data. We are all responsible for the proper use of NRG assets and have an obligation to protect them from misuse, abuse, sabotage or loss. Assets also include the corporate image and reputation of the organization.



We allow limited personal use of technological tools. Employees should have no expectation of privacy regarding information stored or transmitted via company technology.

We treat all electronic records that are created or transmitted using company tools as company property.

### **18-Protection of intellectual property and copyright**

NRG's investment in technology requires strong protection of the resulting intellectual property assets. Intellectual property is created whenever an employee of NRG makes a new discovery or conceives an idea, device, technique or process related to our business. The invention becomes the exclusive property of NRG. By joining the company, we all accept this concept as a condition of employment.

The company also protects its intellectual property and confidential information by using a non-disclosure agreement and a confidential disclosure agreement before providing access to such information to third parties.

At NRG we respect copyright and trademark laws and observe the terms and conditions of software license agreements. We do not make unauthorized copies of software, publications or other copyrighted material. Similarly, we do not use trademarks without proper authorization.

All software, copyrighted material or trademarks that we use must be licensed or owned by NRG. We must comply with company restrictions regarding the installation and use of third-party software on company computers.

### **19-Management of commercial records**

We must keep transparent and accurate business records. The company's capability to make responsible business decisions to meet legal, financial, regulatory and management obligations, and to maximize the benefit of prior experience, will depend on the compliance with this requirement.



We must not conceal, alter or misrepresent the nature of any business transaction. Commercial records and communications are often made public, wherefore we must avoid exaggeration, derogatory comments, speculation or inappropriate depictions of individuals and companies. This also applies to instant and e-mail messages, internal notes or formal reports.

Each business unit is responsible for ensuring that its records are retained or destroyed in accordance with local laws and NRG requirements governing document retention and destruction. We may be required by the company to retain documents, in electronic or other format, in connection with specific matters such as litigation, government or customer inquiries. Failure to retain such documents may result in criminal, civil or administrative penalties or disciplinary action.

We comply with accounting and financial reporting standards and require compliance with internal financial approval limits.

## **20-Accounting and financial reporting standards**

All company transactions must be accurately described in the corresponding accounting or supporting documents. Employees with financial reporting obligations must provide accurate and complete information to ensure that any financial reporting or disclosure is complete, fair, accurate, timely and understandable. We will also seek approval from appropriate financial personnel. These requirements facilitate the preparation of financial statements, provide transparency to our shareholders and ensure compliance with accepted accounting principles.

We must have proper administrative authorization for any transaction we conduct on behalf of NRG.

