



Competitive  
Power Ventures

2023

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# Responsible Investment Policy 2023

Competitive Power Ventures



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# Founding Principles and Objectives

Competitive Power Ventures (CPV) is committed to developing, managing, owning and investing in responsible energy and valuing the increased focus on environmental, social and governance (ESG) matters. We recognize that to be a successful independent power producer, our investors and other key stakeholders not only want but also demand that we show our commitment to being a socially responsible company. Our value proposition outlined below underscores our commitment to ESG — it also underscores what differentiates us from other energy companies.



## VALUE PROPOSITION

CPV is uniquely positioned to leverage global technology and financial partnerships to help modernize power generation. Together with our stakeholders, we are driven to improve our energy infrastructure by developing and operating power generation facilities using cutting edge, domestically available natural gas and renewable power technologies.

ESG matters have become one of CPV's core business strategies and a priority in our Board of Directors' discussions, senior management team meetings and all-hands employee meetings.

We firmly believe that ESG matters are a tool for value creation. Managing ESG risks and opportunities allows us to reduce business risks, improve our financial results and achieve a higher valuation.



An aerial photograph of an industrial complex, possibly a refinery or chemical plant, with various buildings, storage tanks, and piping. The image is overlaid with a semi-transparent blue filter. A large, white, stylized arrow points downwards from the top right corner towards the center of the image.

## MESSAGE FROM THE CEO

“ We are committed to being a good corporate citizen in the communities where we build and operate – and in particular we focus on integrating Environmental, Social and Governance (ESG) matters into the business,

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Gary Lambert, CEO

# Policies and Procedures

Below are the ESG-related policies and procedures that govern our company and projects as well as our measurement and analysis programs which monitor our safety and environmental performance and compliance.



## Environmental Policies, Programs and Procedures

- Environmental, Health and Safety (EHS) Programs
- Environmental Management Procedures and Implementation Plans
- Environmental Compliance Workbooks



## Social Policies, Programs and Procedures

- Operational Manuals
- Emergency Response Plans
- Occupational Safety and Health Administration (OSHA) Training Programs
- Charitable Contribution Strategies
- Sponsorship Payments and Membership Dues Policy and Procedures



## Governance Policies, Programs and Procedures

- Corporate Code of Business Conduct and Ethics
- CPV Compliance Program
- CPV Employee Handbook
- Delegation of Authority Policy and Procedures
- Political Contributions Policy and Procedures
- Gifts and Gratuities Policy and Procedures
- Vendor Setup and Payment Policy and Procedures

# Our Commitments



1. Consider environmental, health, safety and social issues associated with developing new power generation projects.
2. Be accessible to, and engage with, relevant stakeholders.
3. Use governance structures that provide appropriate levels of oversight in the areas of audit, risk management and potential conflicts of interest and implement other policies that align with CPV's interests, our investors and other key stakeholders.
4. Remain committed to compliance with applicable national, state and local labor laws, including providing a safe and healthy workplace in conformance with such laws.
5. Implement and enforce strict policies that prohibit improper payments to public officials consistent with federal, state and local laws and avoid the appearance of conflicts of interest.
6. Provide timely information to investors and key stakeholders on the matters addressed herein, and foster transparency about CPV's activities.

# Responsible Investment Governance

To oversee the implementation of our Responsible Investment Policy, we have formed an ESG Steering Committee and a dedicated ESG Team. Our ESG Steering Committee is Chaired by CEO Gary Lambert and President Sherman Knight, and led by Tom Rumsey, SVP of External and Regulatory Affairs.

CPV's Chief Compliance Officer, Dawn Kurzon, is responsible for overseeing the implementation of our compliance program, which covers business ethics-related issues, among other things.

Our Corporate Communications Director is responsible for promoting our ESG efforts and communicating them widely to our employees and key stakeholders.



# Delivering on Our Commitments

1. Consider environmental, health, safety and social issues associated with developing new power generation projects.

Our development team starts by looking at locations where we can deploy renewable or natural-gas-fired generation that would, among other things, displace older, less efficient power generation. Once we have identified those sites, our developers work closely with EHS consultants during every project's development phase to secure the required permits. We must be able to show that a new development project will not endanger the community and will comply with federal, state and local laws. Our projects often result in other benefits to local communities such as the cleanup of brownfield sites, wetland restoration and greywater usage.

2. Be accessible to, and engage with, relevant stakeholders.

Our management takes a leadership role in engaging with relevant stakeholders during a project's development, construction and operation.

Our external affairs team conducts substantial community outreach and communications efforts. Our goal is, among other things, to communicate our ESG efforts to gain the trust of the communities where we develop, build, manage and operate our facilities. This outreach and communication involves intensive relationship-building with local media and organizations such as chambers of commerce, economic development corporations, public schools and the Boy Scouts and Girl Scouts, to name a few.

Our charitable giving strategy aligns with our business objectives and proactively supports first responders and Science, Technology, Engineering and Mathematics (STEM) initiatives in our local communities.



3. Use governance structures that provide appropriate levels of oversight in the areas of audit, risk management and potential conflicts of interest and implement other policies and procedures that align with CPV's and our key stakeholders' interests.

Exposure to legal, regulatory and reputational risks is part-and-parcel of the energy industry and a fact of life for power producers like CPV. Our key focus areas of risk include:

- Notices of Violation or investigations by regulatory agencies
- stakeholder lawsuits
- failure to comply with our contracts
- loss of stakeholder support to develop, build or operate our facilities

CPV identifies and manages ESG-related risks and opportunities before committing to specific initiatives. CPV's senior management team routinely reports to our key stakeholders on those risks and opportunities related to EHS and compliance for review and input.

4. Remain committed to compliance with applicable national, state and local labor laws; provide a safe and healthy workplace in conformance with national, state and local laws.

To comply with labor laws, CPV uses standards and guidelines developed by federal, state and local governments. At the federal level this includes the Department of Labor's laws and regulations, such as those outlined by OSHA. CPV has incorporated the Department of Justice's best practices for effective compliance into its internal corporate compliance program and provides ongoing reinforcement and training for its employees.



5. Implement and enforce strict policies that prohibit improper payments to public officials and corporations consistent with federal, state and local laws.

At CPV, we do not under any circumstances use any means to improperly influence the decisions of government officials, partners, customers or potential customers. Every CPV employee must read, sign and abide by our Business Code of Conduct & Ethics, which includes sections on bribery, kickbacks and other corrupt payments, and conflicts of interest. Our Political Contributions Policy and Procedures outline in detail how we work to ensure compliance with all applicable laws and regulations governing our political contributions. For example, all political contribution requests must be reviewed and approved by six individuals at CPV including our CEO, Chief Compliance Officer, General Counsel and Outside Counsel.

6. Provide timely information to key stakeholders on the matters addressed herein, and foster transparency about CPV's activities.
  - On a quarterly basis, CPV's Board of Directors convenes and CPV's senior leadership spends considerable time discussing ESG-related matters.
  - CPV provides a quarterly report to investors with ESG-related data and information.