

# Our Global Code of Business Conduct and Ethics

The Way We Do Business Worldwide



# Message from KR Sridhar



Powering our planet with resilient and sustainable energy is the defining challenge of our time. From the beginning, our mission at Bloom has been to make clean, reliable energy affordable for everyone in the world. This mission is what unites all our employees.

Working at Bloom is not just another job, but an opportunity to make a difference – to enrich lives with reliable, affordable electricity and preserve the environment for current and future generations. Our mission speaks to the high values and standards we set for our company and our behavior. We recognize that our ability to fulfill this mission will be greatly influenced by how we conduct ourselves.

How we do things must be as important as what we do.

This means not just following the law and Bloom policies but exemplifying the highest ethical standards in all our daily actions. We do this by treating each other, our customers, our partners, and other stakeholders the way we want to be treated – with honesty, trust, and respect. This is a fundamental, enduring aspect of the Bloom culture and integral to our success.

Our Global Code of Business Conduct and Ethics provides the foundation for putting our mission and values into practice – to act in accordance with the law and at all times maintain the highest ethical and professional standards. By acting with the utmost integrity, each of us can help protect Bloom’s reputation and promote a healthy working environment where employees can thrive and have a positive impact as we work to create a more sustainable future.

The Code defines standards and references policies and resources to help you make the right decisions for yourself and Bloom. Please read the Code, understand what it means and what is expected of you and follow the Code in everything you do. Ask questions if you are unsure as to what your duties are or how to handle a particular situation.

We must all do our part to preserve our values and conduct our business ethically and with integrity. If you have reason to believe that a legal or ethical violation has occurred, it is your duty to report it.

Thank you for your dedication to Bloom and for upholding the principles and standards set forth in the Code.

A handwritten signature in black ink that reads "Sridhar - K.R." in a cursive, slightly slanted script.

**KR Sridhar**

Founder, Chairman and Chief Executive Officer

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### Visit :

Compliance and Ethics on  
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### Contact:

[compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)

# Our Mission

To make clean, reliable energy affordable for everyone in the world.

# Our Values

At Bloom Energy, our values define who we are and shape our corporate culture. Changing the future of energy is no small task, but our diverse group of thinkers, solvers, and dreamers are up to the challenge. Driven by a shared passion for our planet, our employees help design, produce, and distribute unique energy solutions that transform how we power our world.



## BE Bold

We challenge the status quo using a considered, data-driven approach to exceed our customers' needs and solve their most complex problems.



## BE Inspired

Our compassion for our planet pushes us to deliver world-leading energy solutions. Our compassion and desire to do the right thing establishes trust and delivers excellence across the products we build and the customers we serve.



## BE Agile

We learn quickly and embrace entrepreneurship to adapt nascent ideas into best-in-class products that enable scalable, low-cost energy transformation.

# About Our Code

## Scope

Bloom Energy Corporation and its subsidiaries, along with their employees, corporate officers, and directors, are subject to this Global Code of Business Conduct and Ethics (the "Code"). We also expect all contractors, consultants, and other service providers who do work for us to follow the Code. When we use the term "employee" throughout the Code, we are referring to employees, officers, directors, contractors, consultants, and other members of the extended workforce of Bloom Energy and its subsidiaries.

## Using Our Code

Please take the time to read our Code thoroughly. Consider how it applies to your work and think about ways to avoid engaging in improper, illegal, or unethical actions. You can use the questions and answers provided in the Code to clarify any situations you may come across. If you have any doubts or questions, please don't hesitate to speak to your manager or contact one of the resources mentioned in the Code, particularly in the "Speak Up" section.

## Putting Our Ethical Principles into Practice

Our Code is intended to guide our business conduct and provide answers to common situations, and resources for help, but, can't address every situation or list all policies. It doesn't change existing legal rights and obligations. Our success depends on ethical decisions and actions worldwide, building loyalty, trust, and respect among all employees, partners, customers, and communities.

Violations of our Code, or the policies referred to in our Code, may result in disciplinary action in accordance with local law and/or internal procedure, up to and including termination of employment or contract for services, criminal prosecution, or both.

## Global Application

It is our goal to always abide by our Code and comply with applicable law, regardless of our location or work environment. Bloom Energy and its subsidiaries operate in various countries, each with its own legal requirements and customs. Despite the differences that may exist between countries and regions, we acknowledge our responsibility to adhere to the local laws that pertain to our work. If you find yourself in a situation where the Code or U.S. law conflicts with local law, please contact the Legal Department for guidance.

# Our Responsibilities

## Employees

- Familiarize yourself with our Code and policies, and always follow them. Use them as a resource, along with your manager and other resources provided in the Code, if you have any questions or concerns.
- Promote and maintain a positive work environment in which everyone is included, empowered, and encouraged to ask questions, provide feedback or raise concerns.
- Always be honest in your business dealings.
- Follow all applicable laws and regulations.
- Be mindful of our reputation and how our actions can be interpreted. Use good judgment and common sense to avoid situations that could harm our reputation or cause embarrassment to the Company.
- Act in the best interest of Bloom Energy and avoid any conflicts of interest or even the appearance of such conflicts.
- Understand the limits of your authority and act within them according to your job.
- Follow established policies and guidelines to prevent loss, damage, destruction, theft, unauthorized or improper use, or waste of Bloom Energy assets and information.
- Complete all required training.
- Cooperate in internal and external audits and investigations.
- Promptly raise any concerns about potential violations of the law, our Code or our policies.
- Never retaliate against anyone who raises a concern in good faith about a possible violation of our Code, policies, or the law, or who cooperates in an investigation.

## Leaders

- If you manage others, you must uphold the highest standards of conduct and make those standards clear to those who report to you.
- Foster a positive work environment in which only behaviors that are legal and comply with Bloom Energy's Code and policies are acceptable.
- Regularly communicate the importance of ethical business practices and discuss the legal and ethical implications of decisions.
- Ensure high-quality work and honest, fair communication with all business partners.
- When evaluating and recommending compensation for your teams, consider their adherence to our Code and policies as a factor.
- Encourage honest communication and create a safe environment for employees to ask questions and raise concerns without fear of retaliation.
- Respond quickly and effectively to employees who seek advice or raise concerns.
- Ensure that the employees on your team are not the subjects of retaliation for making good-faith reports.
- Promptly report any concerns received from team members or others concerning violations of our Code, policies or the law to Compliance and Ethics or the Bloom Energy Helpline.

## Board of Directors and Senior Management

- The Audit Committee of Bloom Energy's Board of Directors oversees our Company-wide compliance program. You will find contact information for the Audit Committee in the "Administration of the Code" section.
- The Chief Legal Officer and Corporate Secretary of Bloom Energy is responsible for the administration and management of our Code.

# Making Ethical Decisions

When faced with a difficult decision, consider these questions:

1 Is it Legal?

2 Is it consistent with our values, Code, and policies?

3 Am I being fair and truthful?

4 Am I acting in the best interests of the Company and our customers?

5 If my actions were reported in the news or on social media, would I avoid embarrassment?

6 Could I defend this if asked to do so?

If you answered “Yes” to all of the above questions, you can proceed. If you answered “No” to one or more questions, do not proceed. Reach out to Compliance and Ethics for guidance.

Our Code can’t provide complete answers to all questions. You should always apply the decision-making matrix above and seek help on the proper course of action when you are unsure. You should expect timely and specific guidance from our managers, the Human Resources Department, the Legal Department, and Compliance and Ethics, whose contact information is listed in the “Administration of the Code” section of our Code.

# Speak Up

## Each of us has a responsibility to speak up

It is important to report any suspected violations of the law, even if they involve Bloom Energy employees or business partners. We strongly encourage immediate reporting of any suspected breaches of our Code or Company policies. Additionally, we encourage you to report any activities that could damage the Company's reputation, such as unethical behavior.

You can report concerns to your manager, but you can also contact Human Resources, Compliance and Ethics, or Legal. You can also reach out to the Bloom Energy Helpline at <https://bloomhelpline.com/> for guidance.

The Bloom Energy Helpline is:

- Operated by an independent confidential reporting company whose trained personnel staff the Helpline; and
- Available 24 hours a day, seven days a week in the languages of Bloom's employees throughout the world.

If you are hesitant to disclose your identity, you may make an anonymous report, unless local laws prohibit you from doing so. However, we strongly encourage you to share your identity, as it helps us conduct a comprehensive investigation. When submitting your report, please include as many factual details as possible. Even if you lack sufficient information or are uncertain about the nature of the problem, we still encourage you to report your concern.

## Investigations

We seek to investigate all reports promptly, fairly and in accordance with our legal obligations. All employees are required to cooperate fully in any investigation. We will take reasonable precautions to keep your identity (if you disclose your identity) and the investigation confidential to the extent possible, except as necessary to conduct a full and fair investigation and meet our legal obligations. Appropriate remedial action will be taken if misconduct is found.

## Speak Up Channels

You may use any of the following reporting channels:

- Any manager (provided they are not involved in the alleged violation)
- Compliance and Ethics: [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- Human Resources: [human.resources@bloomenergy.com](mailto:human.resources@bloomenergy.com)
- The Bloom Energy Helpline: <https://bloomhelpline.com/>

For violations related to financial recording and reporting, internal accounting controls, an auditing matter or fraud, you may contact the Audit Committee of the Bloom Energy Board of Directors:

- Bloom Energy Corporation  
Attn: Audit Committee of the Board of Directors  
4353 North First Street San Jose, CA 95134 or
- [audit.committee@bloomenergy.com](mailto:audit.committee@bloomenergy.com)

## Non-Retaliation

We do not allow retaliation against anyone who, in good faith, discloses any actual or suspected violations of the law, this Code or Bloom policies or participates in a Bloom Energy investigation. Retaliation will result in disciplinary action which could include termination of employment.

BE Bold

BE Inspired

BE Agile

# Our Workplace Environment



## The Way We Do Business @ Bloom Energy

We strive to maintain a work environment that is healthy, safe, and productive.

Bloom Energy values diversity and is committed to equal employment opportunities for all qualified employees and applicants. It is our policy to not discriminate based on race, religion, color, creed, national origin, citizenship status, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), sexual orientation, age, ancestry, disability (mental or physical), medical condition, marital status, military and veteran status, gender, gender identity and gender expression, genetic information, requests for or family and medical leave status, domestic partnership status, recipient of public assistance status, or any other classification protected by applicable local, state or federal laws and ordinances. As an equal opportunity employer, we strive to create a safe and inclusive work environment for everyone.

Workplace violence, discrimination, harassment, sexual advances or comments, racial or religious slurs or jokes, and any other behaviors or comments that are discriminatory or create a hostile work environment are strictly prohibited.

## Your Role

- Treat all individuals you interact with on behalf of Bloom Energy in a non-discriminatory manner, including employees, applicants, customers, suppliers, and contractors.
- Create and foster a work environment free from discrimination, violence, bullying, and harassment.
- Do not harass or discriminate against others because of protected characteristics.
- Never make an unwelcome sexual advance or create a hostile working environment for anyone you interact with.
- Do not be under the influence of illegal drugs, controlled substances used for non-medical purposes, or, other than in connection with Bloom Energy authorized events, alcoholic beverages in the workplace.
- Do not use, possess, transfer, sell, purchase, or be under the influence of any illegal or unauthorized drug or other intoxicant while on Bloom Energy premises, during work hours, and/or when performing any Bloom Energy business.

**Q:** One of my co-workers often makes racial jokes. What should I do?

**A:** You have a few different options, including (1) addressing the behavior directly with the co-worker, (2) speaking to a member of Human Resources, or (3) reporting your concern via the Bloom Energy Helpline. You are not required to address this behavior directly to your co-worker.

## More Tools

- [Employee Handbook](#)
- [human.resources@bloomenergy.com](mailto:human.resources@bloomenergy.com)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Human Rights

## The Way We Do Business @ Bloom Energy

We strive to adhere to legal regulations concerning human rights and treat all individuals impacted by our business with fairness and respect, in support of the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights.

We support our employees' right to freely associate. We work to identify and address potential risks of forced labor, human trafficking, and slavery in our supply chains.

We prohibit the use of forced, bonded, or any other form of compulsory labor in our production of goods and services.

We seek to adhere to the International Labour Organization (ILO) Minimum Age Convention and comply with all local laws, regulations, and standards related to working hours and rest periods.

## Your Role

- Respect the human rights of individuals you interact with and require the same of all Bloom Energy business partners.
- Follow all applicable supplier due diligence procedures.
- Be aware of red flags, including workers who appear below the age of 18, unsafe working conditions, and visible signs of workplace abuse, including harassment, bullying, discrimination, or violence.
- Ask questions or report concerns to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** I'm concerned a supplier is using child labor, what should I do?

**A:** You must report your concern to a manager, Compliance and Ethics, Legal or the Bloom Energy Helpline.

## More Tools

- [Global Business Partner Standards](#)
- [Social Compliance Program](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Environment, Health, and Safety

## The Way We Do Business @ Bloom Energy

We are committed to the health, safety, and overall well-being of our employees.

We seek to prioritize safety across our operations by implementing policies and procedures related to safety, health, and environmental concerns. We also provide regular training to our employees to equip them with the necessary knowledge and skills to maintain a safe and healthy working environment.

Dedicated to continuous improvement, we strive to improve our safety measures and prevent incidents from occurring. This includes conducting interactive training programs, performing hands-on audits, holding monthly team meetings, and conducting root-cause analysis in case of any incidents. We believe that by learning from these incidents, we can further improve our safety measures and maintain a hazard-free work environment.

## Your Role

- Protect the environment and the communities in which we operate and conduct business.
- Understand and follow all relevant laws, regulations, and permits related to environmental, health, and safety issues. This includes complying with guidelines for waste disposal, pollution control, and workplace safety measures.
- Adhere to Bloom's physical security policies, including visitor management, facility access, and badge usage.
- Do not work under the influence of alcohol (other than in connection with Bloom Energy authorized events), illegal or unauthorized drugs, or any other substance that could compromise safety or performance.
- If you are unsure of the proper safety requirements, it is important that you ask questions.
- Make sure to halt any work that appears hazardous or incorrect.
- Complete all required training.
- Ask questions or report concerns and potential violations to a manager, Environmental, Health, and Safety, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** While visiting a customer site during construction, I noticed something that could create environmental risk. What should I do?

**A:** Immediately contact the site manager or Environmental, Health & Safety and let them know about the issue.

## More Tools

- [Global Business Partner Standards](#)
- [Social Compliance Program](#)
- [safety@bloomenergy.com](mailto:safety@bloomenergy.com)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Sustainability



## The Way We Do Business @ Bloom Energy

We have an unwavering passion for contributing to a clean, healthy, and energy-abundant world.

Bloom Energy offers solutions that significantly lower local criteria pollutants and reduce global greenhouse gas emissions. Our products displace less efficient energy forms, including combustion-based power producers and on-site stationary internal combustion engines. In addition to emitting near-zero smog forming criteria pollutants, Bloom's products often lower greenhouse gas emissions by displacing less efficient marginal generation on the grid. We design our products to consume minimal water and operate at a high-power density, which optimizes land use.

In addition to the products and services we offer, we participate in sustainability-driven and community-oriented initiatives to further promote operations and business practices grounded in sustainable principles. Please read our annual Sustainability Report to learn more.

## Your Role

- Do your part to reduce your use of energy, minimize printing and the use of paper, and recycle/compost whenever possible.
- Watch out for business practices that pose an environmental hazard or unnecessarily use natural resources.
- Speak up with any suggested environmental or social actions or practices for our employees, customers, suppliers, or business partners.

**Q:** I have ideas as to how Bloom Energy can improve recycling within our offices. Who should I contact?

**A:** Contact [green.team@bloomenergy.com](mailto:green.team@bloomenergy.com).

## More Tools

- [Bloom Energy Sustainability Report](#)
- [sustainability@bloomenergy.com](mailto:sustainability@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Quality



## The Way We Do Business @ Bloom Energy

We endeavor to treat customers with courtesy and respect at all times, and we work together to satisfy our customers' needs for high-quality and reliable service.

We strive to comprehend and fulfill the requirements of our customers, while simultaneously upholding our own ethical standards. We are honest about our services and abilities, and we aim to never promise things we cannot deliver. In essence, we treat our customers with the same respect and consideration that we would like to receive.

We further work to design and provide products and services in accordance with our policies, business procedures, and assessments, to provide top-notch quality.

## Your Role

- Listen carefully and respond quickly to customer inquiries and requests.
- Act professionally, respectfully, and with empathy.
- Work safely, responsibly, and courteously when on the property of a customer or other third party.
- Treat customers fairly and consistently, including using fair and honest practices in advertising, marketing, sales, and customer service interactions.
- Never bypass quality controls or take shortcuts that compromise the quality or safety of our services.
- Report concerns and potential violations to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** Tony received a call from a customer asking for information that he does not have. What should he do?

**A:** Tony should promptly pass on the query to Bloom's Customer Service Experience Team at [customer@bloomenergy.com](mailto:customer@bloomenergy.com) and respond by acknowledging the request and letting the customer know that a Bloom representative will contact him or her shortly.

## More Tools

- [Employee Handbook](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Protecting Company Information and Assets

## The Way We Do Business @ Bloom Energy

We have a responsibility to use and safeguard information related to Bloom Energy and information related to or provided by our customers, employees, suppliers, and other business partners, in an appropriate manner (together, Company information). This includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. This also applies to our systems, devices, and other technology used for processing proprietary information.

Make sure you are engaging in social media conversations the right way. You must be respectful to others when conducting business on behalf of Bloom Energy or when you could be identified as someone who works at Bloom Energy. You are prohibited from sharing Bloom Energy's proprietary and confidential information, including personally identifiable information, on external social media sites.

We also each play a role in protecting and efficiently using Bloom Energy's assets, which include our physical property and systems as well as such intangible assets as our reputation, confidential business information, patents and trademarks, and other intellectual property. We must use these assets to serve our customers and preserve value for investors and other stakeholders.

## Your Role

- Take reasonable care to prevent loss, damage, destruction, theft, unauthorized or improper use, or waste of Bloom Energy assets and information.
- Use or authorize the use of any Bloom Energy assets only for legitimate Bloom business purposes, regardless of condition or value.
- Do not use equipment or technology prohibited by Bloom Energy or a government entity.
- Protect, secure, retain, and destroy Company information in accordance with Company or local requirements.
- Protect public and non-public Company information for which Bloom has intellectual property rights.
- Never copy, reproduce, or transmit protected material, such as engineering designs, product materials, customer lists, writing, artwork, music, video, photographs, movie clips, and software without authorization or license.
- Do not take, sell, lend, borrow, give away, or dispose of Bloom Energy assets without proper authorization.
- Promptly report any concerns about the use, abuse, or endangerment of Bloom Energy assets to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** I'm not able to access my Bloom Energy email. Can I use my personal email account to send messages to other employees or customers?

**A:** No. You are not allowed to use your personal email account for Bloom Energy business. You must wait until you have regained access to your company email account.

## More Tools

- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Social Media Policy](#)
- [Bloom Energy Helpline](#)

# Privacy and Cybersecurity



## The Way We Do Business @ Bloom Energy

We endeavor to collect, use, and share personal information responsibly, and in compliance with all applicable privacy laws and regulations. We provide options for applicants, employees, and others who share their personal information with Bloom Energy to exercise those rights.

We take measures to protect our systems, networks, and devices against theft, loss, or unauthorized access. We aim to safeguard our products, processes, services, technology, and the valuable proprietary information they hold. To achieve this, we implement multiple layers of security controls and monitor our information resources. This is done to support the security of Bloom Energy's information, maintain our operations, and comply with applicable laws and business obligations.

## Your Role

- Only access and handle personal information when it is necessary for business purposes, and in accordance with relevant privacy policies.
- Keep personal information only as long as necessary and dispose of it securely.
- Protect personal information in your possession and ensure appropriate contracts are in place with vendors who process it on our behalf.
- Only use the assets and information resources of Bloom Energy for which you have been authorized.
- Use only approved software, devices, and company emails while conducting Bloom Energy business.
- Use strong passwords and refrain from sharing them with anyone.
- Avoid clicking on any links or opening attachments that are sent through emails from unknown senders.
- Ask questions or report privacy or cybersecurity concerns to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** I accidentally sent personal information to the wrong person. What should I do?

**A:** Contact Compliance and Ethics immediately. They will help determine next steps and regulatory obligations.

## More Tools

- [Applicant and Employee Privacy Notice](#)
- [Privacy Policy](#)
- [Information Security Policy](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Intellectual Property



## The Way We Do Business @ Bloom Energy

Bloom Energy maintains and develops valuable intellectual property, including patents, trademarks, copyrights, trade secrets, and other confidential information. We make it a point to defend our intellectual property rights against unauthorized use to protect our competitive advantage. We also must respect the legitimate intellectual property rights of others and take necessary precautions to avoid infringing on any third party rights.

It is important that patentable inventions are applied for before the concepts are publicly disclosed or embodied in a product that is sold. Thus, inventors are encouraged to submit invention disclosures in a timely fashion.

Trade secrets are only valuable if maintained as secrets. Thus, do not disclose any confidential information to third parties without a proper non-disclosure agreement in place.

If a vendor, customer, or competitor raises intellectual property issues, contact Bloom Energy Legal so that appropriate actions can be taken to avoid any adverse consequences.

## Your Role

- Timely submit inventions created as part of your employment with Bloom Energy to the Patent Review Board
- Ensure Bloom Energy designs and inventions referenced in marketing and sales materials for new products are covered by an issued patent or a pending patent application filed with the U.S. Patent Office before publishing.
- Do not bring, access, keep, share, or use a third party's proprietary information, including that from a previous employer, at or for Bloom Energy without prior authorization from Legal.
- Classify and store electronic versions of intellectual property appropriately, secure physical copies of IP, log out of Bloom Energy computing devices when not in use, and take Bloom Energy-issued laptops to and from work.
- Never use intellectual property or other confidential information acquired on the job for personal gain.
- Make sure a non-disclosure agreement is in place before sharing intellectual property or other confidential information externally.
- Use a secure method when transmitting intellectual property and other confidential information to a third party.
- Report concerns with the collection, use, and sharing of intellectual property and other confidential information to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** I need to send intellectual property externally. How can I do so securely?

**A:** To share confidential information securely, ensure there is an NDA in place. Use a secure file share site like Egnyte or FTP-S, password-protect the file, or encrypt the file and send the password separately. For more information, contact the IT Help Desk.

## More Tools

- [Invention Disclosure Process](#)
- [Non-Disclosure Agreement procedures](#)
- [legal@bloomenergy.com](mailto:legal@bloomenergy.com)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Insider Trading



## The Way We Do Business @ Bloom Energy

We can not share or use material nonpublic information for personal benefit. Insider trading is unethical and illegal and can result in severe penalties for Bloom Energy and its employees.

While conducting business, it is possible to come across nonpublic information about Bloom Energy or another company. This information is considered "material" if investors can use it to make decisions regarding trading shares of stock in the company. Examples include revenue, earnings, or other financial results, significant lawsuits, changes in executive leadership, or audit results.

It is strictly prohibited for employees to use such information for insider trading or to provide it to others by "tipping." We all are responsible for safeguarding confidential and nonpublic information from inadvertent or accidental disclosure.

This is only a summary of the obligations, risks, and consequences described in more detail in our Insider Trading Policy, which you should review closely and must adhere to.

## Your Role

- Do not buy, sell, or otherwise deal with shares of stock in Bloom Energy or any publicly traded company when you have material nonpublic information about Bloom Energy or about such other company as a result of your employment with or relationship with Bloom Energy.
- Avoid disclosing nonpublic information, directly or indirectly, to anyone outside of Bloom Energy, including family members, relatives, or friends ("tipping").
- Refrain from sharing material nonpublic information with fellow employees.
- Never encourage others to trade on material nonpublic information.
- Do not spread false information or do anything to manipulate the price of publicly listed securities.
- Ask questions or report insider trading concerns to Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** Can I discuss Bloom Energy's financial results with family members before earnings are released?

**A:** No. This is material nonpublic information and cannot be shared publicly before the earnings release. It could also be considered "tipping" if the family member trades on this information.

## More Tools

- [Insider Trading Policy](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Reporting and Recordkeeping



## The Way We Do Business @ Bloom Energy

We must keep accurate books and records and make accurate public disclosures.

We're all responsible for the accuracy of the records and data we generate – such as timecards, expense reports, corporate balance sheets, equipment maintenance records, and supplier data.

We seek to produce public disclosures that are complete, fair, timely, and accurate. We are committed to presenting our financial condition and results of operations in a fair manner. Our employees who collect, provide, or analyze information for these reports must follow all disclosure controls and procedures to ensure that we produce accurate financial disclosures as required by law.

Our disclosure controls and procedures are specifically designed to ensure that all reports and documents filed with or submitted to the United States Securities and Exchange Commission and other public disclosures accurately and fairly represent Bloom Energy's financial condition and results of operations. These controls and procedures are also aimed at ensuring that our disclosures are complete, timely, and easily understandable.

**Q:** Carrie provided her manager with the quarterly results of her function. Her manager then sent the results to Finance. She noticed her manager changed the data she gave to him before he sent it to Finance. When she asked him about it, he said to “forget it.” What should she do?

**A:** If Carrie is not comfortable with her manager's response, she should report her concern to Compliance and Ethics, Legal, or the Bloom Energy Helpline.

## Your Role

- Follow all Bloom Energy policies and laws regarding document and record preservation.
- Ensure all business transactions are recorded completely, accurately, and in a timely manner.
- Provide actual receipts or backup documentation when required
- Accurately document the terms of sales and other commercial transactions and record them in a timely fashion in Bloom Energy's books and records.
- Avoid any transactions that are inappropriate, such as those that knowingly misrepresent the reporting of other parties like customers or suppliers.
- Follow all delegation of authority and segregation of duties requirements.
- Employees involved in financial reporting should follow our disclosure controls and assist in producing complete and mandatory disclosures about Bloom Energy's business and risks for investors.
- Report incomplete or inaccurate disclosures or any transaction that requires disclosure to Legal or the Bloom Energy Helpline immediately.

## More Tools

- [Travel and Expense Policy](#)
- [Spending Approval Authorization Policy](#)
- [legal@bloomenergy.com](mailto:legal@bloomenergy.com)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Working in Finance



## The Way We Do Business @ Bloom Energy

We strive to act with honesty and integrity and use due care and diligence in performing our responsibilities to Bloom Energy.

Although we expect all employees to conduct themselves honestly and ethically in all aspects of business, senior finance employees are held to even higher standards. The honesty, integrity, and sound judgment of senior finance employees are essential to the reputation and success of the company.

The Chief Executive Officer, Chief Financial Officer, Controller, Treasurer, as well as any other senior finance personnel and individuals performing similar functions, are required to follow ethical principles and accept the obligation to promote a culture within the Company that ensures the accurate and timely reporting of the Company's financial results and condition.

## Your Role

- Act with honesty and integrity and use due care and diligence.
- Abide by the policies applicable to all employees.
- Avoid any situation, whether real or perceived, that could create a conflict of interest with your obligations to Bloom Energy. It is important to promptly inform the Audit Committee of the Board about any transaction or personal or professional relationship that could reasonably be expected to lead to such a conflict.
- Provide accurate, timely, and understandable disclosures when submitting reports or public communications.
- Never improperly influence or manipulate audits or interfere with auditors performing internal or independent audits of the company's financial statements or accounting records.
- Achieve responsible use and control of all assets and resources entrusted to senior financial employees.
- Comply with applicable laws, rules, and regulations of U.S. federal, state, and local governments and governments outside the United States, and of any applicable public or private regulatory and listing authorities.

**Q:** John's friend is starting a company that may be a competitor to Bloom Energy. The friend asked John if he could help with the accounting for the first few months. Can John help his friend?

**A:** This is a potential conflict of interest. John must obtain approval from his manager and Compliance and Ethics prior to accepting the outside position. He may also need to disclose the relationship to the Audit Committee.

## More Tools

- [audit.committee@bloomenergy.com](mailto:audit.committee@bloomenergy.com)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Conflicts of Interest



## The Way We Do Business @ Bloom Energy

We must make sure to steer clear of any conflicts of interest. If there are any conflicts of interest, they should be disclosed so we can manage them properly.

It is possible for a conflict of interest to occur when our personal activities, ownership interests in other companies, or personal relationships interfere in any way, or even just appear to interfere, with the interests of the Company and our ability to perform our duties impartially and make unbiased decisions for Bloom Energy.

Potential conflicts of interest include, but are not limited to:

- Participating in outside activities.
- A relationship with a supplier or potential supplier.
- A business opportunity discovered through Bloom Energy's work, use of Bloom Energy's property, or information.
- Substantial financial interest, or a close family member with a substantial financial interest, in any company that competes with or does business with Bloom Energy.
- Receiving an improper personal benefit as a result of being a Bloom Energy employee (or a family member of an employee), including loans or guarantees of obligations.

Participation in activities protected by the National Labor Relations Act do not constitute a conflict of interest.

## Your Role

- Make business decisions objectively, without favoritism or discrimination, and in the best interest of Bloom Energy
- Use the Potential Conflicts of Interest Reporting Form to electronically disclose actual, potential, or perceived conflicts of interest.
- Obtain approval before participating in outside activities as an employee, advisor, board member, general partner, consultant, agent, or trustee of a different business, non-profit, or for-profit organization, other than a family-owned business.
- Do not use business opportunities discovered through Bloom Energy work, property, or information for personal benefit.
- Do not compete with the Company.
- Disclose and recuse yourself from employment decisions that involve anyone with whom you have a close personal or family relationship.
- Obtain advance approval for related party transactions, whether or not deemed to be a conflict of interest.
- Directors with conflicts of interest must recuse themselves from discussions when their personal interests interfere with Bloom Energy.
- Seek guidance from a manager, Human Resources, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** Hannah has been asked to sit on the Board of Directors of a start-up company. Can she accept?

**A:** Before accepting, she must obtain written approval from her the Vice President of her function and Compliance and Ethics.

## More Tools

- [Potential Conflicts of Interest Reporting Form](#)
- [Gifts and Entertainment Policy](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# International Trade and Immigration

## The Way We Do Business @ Bloom Energy

We seek to adhere to all applicable laws, regulations, and rules that govern international trade, including economic and trade sanctions, export control, customs, and anti-boycott laws, as well as immigration laws.

Before importing, exporting, re-exporting, or delivering our products, services, and technology, we must ensure that we have the proper authorization to do so under applicable laws.

We seek to comply with all economic and trade sanctions, export control, customs, and anti-boycott laws, that apply to our business. These trade controls may limit or prohibit us from doing business with certain countries, companies, and individuals. They may also restrict or prohibit the transfer of funds to or through a country, territory, company, group, or individual. We are strictly prohibited from endorsing or following, and must report to the U.S. government, any request to participate in a foreign boycott that is not sanctioned initiated by the United States.

We must comply with all applicable immigration requirements, including employment verification laws. Cross-border travel to support our business must meet the immigration, payroll, and tax requirements of our policies and the laws of the destination country.

## Your Role

- Follow all business policies and procedures relating to economic and trade sanctions, export control, customs, and anti-boycott compliance.
- Maintain accurate data and records for product inventory, sales, and shipment.
- Obtain information from prospective and current customers and suppliers to help identify potential sanctions and export control risks.
- Do not work in or with any business or individual connected to a sanctioned territory or a known or suspected sanctions target without Compliance and Ethics approval.
- Enter required information accurately in our systems, such as Oracle and Salesforce. This helps us conduct ongoing screening of our customers and business partners.
- Do not participate in boycotts of Israel or any other unsanctioned foreign boycott.
- Follow the destination country's entry requirements when traveling for meetings, training, or other business purposes.
- Ask questions or report concerns to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** One of our new customers outside the United States has sent a revised contract with language requiring Bloom Energy to comply with a boycott of certain countries. What should we do?

**A:** Do not sign the contract until you have discussed it with Legal and obtained their authorization to do so. The request could violate U.S. anti-boycott laws.

## More Tools

- [Economic and Trade Sanctions Policy](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Improper Payments, Gifts and Entertainment

## The Way We Do Business @ Bloom Energy

We want to compete on the quality of our products and strictly prohibit all forms of bribery and corruption, in any form, whether government or commercial bribery.

We support the anti-corruption laws of the countries where we pursue business opportunities, including the U.S. Foreign Corrupt Practices Act, and strive to always follow our Anti-Corruption Policy.

We avoid offering, giving, or receiving any gifts, entertainment, or other things of value that could influence business decisions or be perceived as such, and follow the Gifts and Entertainment Policy to prevent conflicts of interest.

We believe in supporting the communities where we live and work, and we encourage community involvement. However, we want to ensure that our involvement is always ethical and fair. Therefore, we do not sponsor events or engage in charitable contributions in exchange for business, favors, or favorable treatment from third parties such as customers, government employees, or suppliers.

## Your Role

- Never offer or accept any gifts and entertainment other than those permitted by the Gifts and Entertainment Policy.
- Get approval from Compliance and Ethics for all gifts and entertainment given to government officials, and for gifts and entertainment with a value of USD 100 or more given or received from others.
- Decline offers and gifts during pending decisions.
- Never offer or accept bribes or kickbacks or engage in facilitating payments.
- Record all payments and receipts, including for gifts and entertainment, completely and accurately.
- Never use an agent, consultant, or any other third party to bribe or do anything else that our policies prohibit us from doing.
- Refrain from using your personal funds as a way to evade compliance with our policies.
- Do not pressure others to contribute to charitable organizations or other community causes and sponsorships.
- Never engage in a sponsorship or charitable contribution in exchange for business or because we expect a favor in return.
- Ask questions or report concerns to Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** What is a kickback?

**A:** A kickback is a particular type of bribe that involves giving or receiving a payment or other form of gift as a reward for the awarding of a contract or other favorable outcome or business transaction. Kickbacks are strictly prohibited.

## More Tools

- [Reporting and Approval Forms](#)
- [Anti-Corruption Policy](#)
- [Gifts and Entertainment Policy](#)
- [Corporate Sponsorships and Charitable Contributions Policy](#)
- [Global Business Partner Standards](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Anti-Money Laundering

## The Way We Do Business @ Bloom Energy

We must safeguard Bloom Energy against any money laundering activities.

Money laundering refers to the act of hiding the proceeds of illegal activities or the origin of illegal funds to make them appear legitimate. These transactions have the potential to support terrorist groups or organizations that back them, or they may be an attempt to conceal other illegal activities.

It is important to ensure we only do business with trustworthy partners, for lawful purposes, and with lawful funds. Be cautious of any potential supplier requesting cash payments or unusual payment terms, as these are potential red flags. In case you suspect any potential money laundering activities, report the situation to the General Counsel without any delay.

## Your Role

- Be aware of and report money laundering red flags, including frequent changes in account information, vague background information, questionable sources of funds, and frequent overpayments.
- Follow Know Your Business Partner Requirements.
- Enter required information accurately in our systems, such as Oracle and Salesforce. This helps us to conduct ongoing screening of our customers and business partners.
- If you handle incoming payments, understand who is making the payment, why, and where it's coming from.
- Ask questions or report concerns to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** A customer overpaid and requested we reimburse them to a different bank account. What should we do?

**A:** Bloom will only reimburse funds to the account that made the overpayment. Contact a member of Finance to discuss next steps.

## More Tools

- [Anti-Corruption Policy](#)
- [Global Business Partner Standards](#)
- [Know Your Business Partner Program Procedures](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Competition

## The Way We Do Business @ Bloom Energy

We seek to compete fairly and comply with all applicable antitrust and competition laws.

We must never engage in anti-competitive behavior, such as price-fixing, market allocation, bid manipulation, or attempted monopolies.

While interactions with competitors may be permissible, it is important to exercise caution since the laws governing such activities are complex and could have negative consequences for Bloom Energy.

As representatives of Bloom Energy, we have a responsibility to treat everyone we encounter in a fair and just manner. This includes our customers, partners, service providers, suppliers, competitors, and all of our colleagues. We must not gain an unfair advantage over anyone by engaging in deceptive practices such as manipulation, abuse of confidential information, misrepresentation, or withholding important facts. Our interactions with others should be characterized by honesty, integrity, and respect.

When deciding among competing suppliers, we must weigh the facts impartially to determine the best supplier. We should do so whether we are in a procurement job or any other part of the business.

## Your Role

- Never discuss pricing or competitive marketing information with competitors.
- Avoid any discussion or agreement on dividing customers or territories.
- Do not provide, receive or exchange any competitively sensitive information with a competitor.
- Avoid contracts with competitors that could create the appearance of improper agreements or understandings.
- Object and remove yourself from conversations with competitors that include prohibited subjects, such as pricing, inventories, market surveys, production, and any other proprietary or confidential information.
- Seek guidance from a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** Why is the source of competitive data an issue?

**A:** Obtaining information illegally or unethically could damage Bloom Energy's reputation and in some cases, could subject you and Bloom to liability. For example, using illegally or unethically obtained information in a bid to a government could result in criminal charges and disqualification from future bidding.

## More Tools

- [Global Business Partner Standards](#)
- [Anti-Corruption Policy](#)
- [Marketing Guidelines](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Working with Governments



## The Way We Do Business @ Bloom Energy

We want to adhere to the highest ethical standards when working with governments.

Bloom Energy's dealings with governments are subject to special rules. Employees must comply with applicable laws and regulations when interacting with government employees and officials. Any contract with a government entity should be reviewed and approved by the Legal department. Any government requests for information or interviews should be immediately referred to Legal.

Government officials refer to individuals working at any level of a government, including civil servants, military officers, diplomats, legislators, political party members, and candidates. This also includes employees of public international organizations such as the United Nations and the World Bank.

Bloom Energy supports legislation that benefits our customers, communities, employees, and shareholders. However, we cannot use improper influence while lobbying for favorable outcomes with government entities.

We must comply with all government procurement laws. These laws are meant to ensure fair and reasonable pricing for products and services.

Approval from Compliance and Ethics is needed to hire current or former government officials or close relatives due to legal and ethical restrictions.

## Your Role

- Be truthful and accurate when dealing with government officials and cooperate with government investigations.
- Obtain written approval from the SVP Government Affairs and Policy and the General Counsel before engaging in lobbying activities and before facilitating visits to Bloom Energy Facilities by public officials.
- Never offer, promise, or give anything of value to a Government Official or to anyone else to gain a business advantage.
- Obtain approval from Compliance and Ethics before giving gifts or entertainment to government officials, regardless of value.
- Follow Bloom Energy's Know Your Business Partner Program when engaging third parties who will act on our behalf with government officials.
- Before submitting proposals or accepting contracts, review government customer requirements.
- Never discuss business or employment opportunities that could personally benefit any government sector procurement personnel during an active or anticipated procurement.
- Do not assist government clients in creating bid specifications or in circumventing procurement regulations.
- Ask questions or report concerns to a manager, Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** What is special about pricing when we are transacting with governments?

**A:** In the United States, there are laws that make it a crime to overcharge the U.S. government. Some other countries have similar laws.

## More Tools

- [Anti-Corruption Policy](#)
- [Gifts and Entertainment Policy and Request Form](#)
- [Social Media Policy](#)
- [Know Your Business Partner Program Procedures](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)



# Working With Third Parties

## The Way We Do Business @ Bloom Energy

We want to choose third parties who share our mission, and only work with those who agree that our shared success is based on acting ethically and lawfully.

As a company, we engage in business with various third parties, including suppliers, joint venture partners, agents, advisors, consultants, and other business partners. To ensure that our interactions with these parties align with our standards, we expect all Bloom employees who engage with them to familiarize themselves with the Global Business Partner Standards.

Certain business partners may pose a higher risk to the Company. These include partners who interact with government officials or customers on behalf of Bloom Energy, or those who present a higher risk of corruption, such as lobbyists, finders, referral partners, sales agents, distributors, and freight forwarders. To support our risk mitigation efforts, all such business partners must go through our Know Your Business Partner Program before being engaged.

## Your Role

- Treat all business partners with fairness and respect.
- Before engaging a new business partner, complete all applicable due diligence and internal procedures, including Bloom Energy's Know Your Business Partner Program.
- Execute a non-disclosure agreement before sharing confidential information with a business partner. Additionally, you should safeguard any confidential information you receive from a business partner.
- Enter required information accurately in our systems to allow ongoing screening of our business partners.
- Avoid potential conflicts of interest when selecting a business partner.
- Never give or accept improper gifts or entertainment from a business partner.
- Recognize red flags when interacting with business partners, such as a business partner who operates without required permits, refuses to disclose relationships to government officials, requests payments in cash, operates an unsafe facility, or is located in a country with a high risk of corruption.
- Ask questions or report concerns to Compliance and Ethics, Legal, or the Bloom Energy Helpline.

**Q:** What is the Know Your Business Partner Program?

**A:** The Know Your Business Partner Program involves risk-based due diligence by Bloom and external vendors. Business partners are screened against sanctions, watch lists, and negative news sources, and are required to fill out a due diligence questionnaire.

## More Tools

- [Anti-Corruption Policy](#)
- [Know Your Business Partner Program Procedures](#)
- [compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- [Bloom Energy Helpline](#)

# Administration of Our Code

## Contact Information

- **Audit Committee of the Board of Directors:**  
[audit.committee@bloomenergy.com](mailto:audit.committee@bloomenergy.com)
- **Bloom Energy Helpline:**  
<https://bloomhelpline.com/>
- **Compliance and Ethics Department:**  
[compliance@bloomenergy.com](mailto:compliance@bloomenergy.com)
- **Legal Department:**  
[legal@bloomenergy.com](mailto:legal@bloomenergy.com)
- **Human Resources Department:**  
[human.resources@bloomenergy.com](mailto:human.resources@bloomenergy.com)
- **Environmental Health and Safety Department:**  
[safety@bloomenergy.com](mailto:safety@bloomenergy.com)
- **Sustainability Department**  
[sustainability@bloomenergy.com](mailto:sustainability@bloomenergy.com)
- **Customer Service Experience Team:**  
[customercare@bloomenergy.com](mailto:customercare@bloomenergy.com)
- **Media inquiries:**  
[press@bloomenergy.com](mailto:press@bloomenergy.com)
- **Investor inquiries:**  
[investor@bloomenergy.com](mailto:investor@bloomenergy.com)

## Policies Referenced

Policies referenced in this Code may be found on our external website, [www.bloomenergy.com](http://www.bloomenergy.com) and/or on [BE Central](#).

## Administration, Modification and Amendment

The Bloom Board of Directors must approve any significant changes to the Code. On May 7, 2024, the Board of Directors adopted and approved a revised Global Code of Business Conduct and Ethics. Changes include: (i) streamlined the document by condensing sections, (ii) revised provisions relating to ethical decision making, our responsibilities, and human rights, (iii) added provisions relating to our mission and values and sustainability, (iv) updated other administrative and non-substantive matters.

The Audit Committee of the Board is responsible for ensuring that procedures are in place for the prompt internal reporting of any violations of this Code. Our Code is reviewed periodically, and will be updated as necessary and appropriate.

## Waivers

The Code provisions can only be waived by the Board of Directors for a Board member or an executive officer. In the case of an employee who is not an executive officer, only the General Counsel may waive a provision of this Code. Whenever a waiver is granted to an executive officer or a Board member, it will be disclosed to shareholders and others in accordance with applicable laws, rules, and regulations.

## No Rights Created

This document outlines the fundamental principles, policies, and procedures that govern the conduct of Bloom Energy and its employees, corporate officers, directors, and contractors in the course of doing business. It is important to note that this document does not create any rights for employees, customers, clients, suppliers, competitors, shareholders, or any other individuals or entities.