



Code of Business Conduct

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A Message from our CEO



Dear Colleagues,

As we continue to grow and expand around the globe, New Fortress Energy's success depends on the trust and respect of our customers, investors, suppliers, employees, and communities where we do business. We earn and maintain the trust of our stakeholders by adhering to the highest ethical standards of business conduct. While laws vary in the countries where we do business, our commitment to integrity and ethical conduct remains the same.

Our Code of Business Conduct (the "Code") has been approved by the Board of Directors. The Code is applicable to all officers, directors, and employees of New Fortress Energy and its subsidiaries (collectively, "NFE" or the "Company"), as well as others who conduct business on our behalf. The Code is designed to help you understand our Company's high standards and how critical they are to creating and sustaining value for our stakeholders. Please read the Code carefully. Do not look at the Code as a book of rules; rather, use it as a reference whenever you need guidance. If you have questions or concerns about the Code, or believe you have witnessed or know of suspected Code violations, we provide several ways for you to be heard, including raising any concerns with your manager.

Thank you for your continued commitment to integrity and the standards set forth in the Code enabling us to work toward our shared vision of lighting the world.

Sincerely,

A handwritten signature in black ink, appearing to read "Wesley R. Edens". The signature is fluid and cursive, with a long horizontal stroke at the end.

[Wesley R. Edens](#)

Chief Executive Officer



Our Expectations

We comply

Our commitment



Our Code of Business Conduct is the foundation for building an ethical and accountable workplace. The Code is applicable to all NFE officers, directors, employees as well as advisors, consultants, business partners, intermediaries and others that conduct business on our behalf. Compliance with our Code is a condition of employment. Violations of the Code carry consequences and may result in disciplinary action up to, and including, termination.

Your responsibilities

- **Act with Integrity.** Do the right thing, even when no one is watching.
- **Follow the Code.** Read, understand, and adhere to the Code.
- **Adhere to applicable laws, regulations, Company policies and procedures.** Educate yourself on the laws, regulations, and Company policies and procedures applicable to your individual job responsibilities. Be attune to any changes.
- **Ask questions.** If you are in doubt about what to do, talk with your manager, Human Resources, Legal or Compliance, or call the Ethics Hotline.
- **Share concerns.**
 - Report conduct you believe violates the Code, Company policies, or the law.
 - Speak up without fear of retaliation when you share your concerns in good faith. Good faith means you honestly believe something is wrong.
 - You may raise a question or concern anonymously 24/7 via phone or the web through our Ethics Hotline.

If unsure whether you have an ethical concern, ask yourself:

1. Is it legal?	2. Is it consistent with the letter (the actual words) and the spirit (the intent) of our Code?	3. Would I feel comfortable if my decision were published or shared with customers, family, and friends?
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	If the answer to any of these questions is no, stop and ask before taking action.	
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We hold our leaders to a high standard

Our commitment

Our leaders - officers, directors, and managers - are responsible for setting the tone for an ethical workplace.

Your responsibilities

- **Model ethical behavior every day.** Lead by example through words and actions. Communicate with your employees about what is expected of them under our Code. Support and encourage training on our Code, Company policies and procedures.
- **Treat employees with dignity and respect.**
- **Ethics over results.** Ensure employees and others acting on our behalf know that results are never more important than conducting business ethically. Intervene and stop any violations of our Code, Company policies and procedures, or the law by anyone.
- **Never retaliate.** Create a culture where employees feel comfortable asking for guidance and reporting concerns without fear of retaliation. Support employees who raise issues. Listen to their concerns, treat the information they share with you as sensitive, and disclose only to those who have a business need to know as you work to find a solution. Never retaliate or permit retaliation by others against those who report issues or concerns in good faith.
- **Take appropriate action when concerns are raised.**
 - Work with Human Resources, Legal, and Compliance to address legitimate compliance concerns and take prompt corrective action, including documenting and taking appropriate disciplinary actions when needed.
 - Consider employee compliance with our Code when evaluating performance.

Our resources

For Code of Conduct concerns, contact:



Your
Manager



Human
Resources



Legal
Department



Ethics Hotline:
833-373-0327



Chief Compliance Officer:
cco@newfortressenergy.com



Our
People and
Planet

We respect people

Our commitment

Our people are critical to NFE's success. We value the diversity of our workplace, which we believe produces the best outcomes. We provide equal employment opportunities based on relevant qualifications, merit, performance, and other job-related factors. We maintain a professional work environment that is free from discrimination, harassment, or abuse. In addition, we do not tolerate any form of retaliation.

Your responsibilities

- **Treat everyone with dignity and respect.**
- **Make employment decisions fairly.** Employment decisions (i.e., hiring, training, promotions, compensation, benefits, etc.) should be made based on legitimate business needs, relevant qualifications, merit, and performance without regard to race, color, religion, sex, gender, creed, sexual orientation, gender identity, age, marital status, genetic information, national origin, citizenship, veteran status, military service, disability or any characteristic protected by applicable law.
- **Comply with all relevant employment, labor, and immigration laws and policies.** NFE respects human rights everywhere. This commitment is reflected in our policies and actions toward our customers, employees, suppliers, and the local communities where we do business.
- **Create a harassment-free environment.** Prohibit discrimination against, harassment of, or retaliation against anyone.
- **Speak up.** Report to your manager or Human Resources behavior that may be discriminatory, retaliatory, hostile, harassing, intimidating, humiliating, abusive, threatening, or bullying.

We protect personal information

Our commitment

Our employees, customers, and third parties working on our behalf trust us to use and maintain their personal information in compliance with the law. Personal information includes data that may identify an individual (e.g., name, social security number or national identity number, home address, phone number, birth date, personal medical history, banking account or payroll information). We respect the basic right to privacy of our employees, customers, and other third parties and take steps to properly secure personal information for use by authorized personnel only.

Your responsibilities

- Know what information is considered “personal information.”
- Use personal information only if authorized for a legitimate business purpose in accordance with our privacy policies and applicable law.
- Report any information breaches immediately.

We respect our planet

Our commitment

We are committed to complying with all applicable Health, Safety, and Environmental (HSE) laws and regulations where we operate to: (i) ensure the health and safety of our employees, customers, the local communities, and others; and (ii) protect the environment. Our goal is to ensure that every employee returns home to their families each day the same way they came to work. We work with our customers and other stakeholders to provide solutions that reduce our environmental footprint and improve energy efficiency consistent with our initiative - Zero carbon. Zero emissions. All good. by 2030.

Your responsibilities

- Comply with all applicable HSE policies, laws and regulations.
- Make environmentally responsible decisions.
- Report spills, leaks, accidents, incidents or safety concerns to your manager or HSE leader immediately.

Our Company



We protect and value our assets

Our commitment

We must safeguard our valuable assets, including our confidential information and intellectual property (IP). “Confidential Information” generally includes non-public Company information that, if revealed, might benefit our competitors or harm NFE, our customers, or investors. IP includes NFE patents, copyrights, trademarks, or proprietary information that cannot be used by others without NFE’s express permission. NFE owns all Confidential Information and IP developed during your employment. In addition, we respect the confidential information and IP rights of others (including our customers and suppliers), and we avoid unauthorized use of the same.

Your responsibilities

- **Protect the Company’s Confidential Information and IP.**
- **Prevent inadvertent disclosure of Confidential Information.**
 - Be careful when discussing Company Confidential Information with colleagues in public places.
 - Protect your User IDs and passwords; do not share them with anyone.
 - Do not download unauthorized software or applications onto your NFE computer.
- **Consult the Legal Department:**
 - If you believe someone is using our IP without permission.
 - Before soliciting, accepting, or using another’s confidential information (unless we have an approved non-disclosure agreement).
 - Prior to disclosing NFE Confidential Information to third parties.

We speak responsibly

Our commitment

We are committed to protecting the NFE reputation and brand. We use good judgement in every business communication whether it is verbal, written, or digital.

Your responsibilities

- Do not respond to inquiries from the media, investors, analysts, or others unless authorized to do so.
- Be professional in all communications.
- Be responsible when using social media.

We maintain accurate financial records

Our commitment

We are committed to providing books and records that reflect an accurate picture of NFE's financial performance. As a publicly traded company, we adhere to all applicable accounting rules and policies, laws and regulations, as well as Company policies and procedures. Proper financial controls are also in place to protect our assets.

Your responsibilities

- Be accurate, complete, and timely in recording business transactions.
- Obtain necessary approvals prior to entering into a financial transaction.
- Maintain supporting documentation for all transactions.
- Cooperate fully with internal and external audits.
- **Report concerns.** If you believe there are any suspected errors or have concerns about our financial records or internal controls, contact our Chief Accounting Officer, Chief Financial Officer, or Compliance. If you have concerns about questionable accounting or audit matters (e.g., concerns that may involve deficiencies in internal controls, misappropriation or fraud), call the Employee Accounting and Auditing Complaints Hotline found in [NFE's Accounting and Auditing Whistleblower Policy](#).

We do not trade on inside information

Our commitment

We do not buy or sell stock (including NFE stock) - or tip others that do so - based on material, non-public (inside) information. Material information includes information that, if known by the public, would be considered important in a decision to purchase or sell stock (e.g., projections of future earnings or losses, pricing proposals, unpublished information about a merger, acquisition, or divestiture, etc.).

Your responsibilities

- No insider trading or tipping.
- Read, understand, and follow [NFE's Insider Trading Compliance Policy](#).
- Contact Legal or Compliance if you have any questions or concerns.

We are alert to prevent money laundering and terrorism

Our commitment

We are committed to complying with the applicable anti-money laundering and anti-terrorism laws. Money laundering is the process of hiding proceeds of criminal activity in legitimate business dealings or using legitimate funds to support criminal activity. We conduct business with reputable third parties that are involved in legitimate business activities and utilize funds from valid sources. We will not proceed with suspicious transactions.

Your responsibilities

- Be alert for offers of cash payments, unusual payment origins, or methods, or any irregularity in the way payments are made.
- Do not enter into any contracts or transactions with customers or suppliers until you confirm with Compliance that the required due diligence is satisfactorily complete.
- Read, understand, and follow the Company's policies and procedures that prohibit money laundering, and contact Compliance if you have any questions or concerns.



Our Relationships

We avoid conflicts of interest

Our commitment

We make business decisions that are always in the best interest of NFE. We avoid potential or actual conflicts of interest. A conflict of interest may arise when an employee's personal interests interfere with his or her ability to make an objective decision for NFE.

Your responsibilities

- **Identify potential or actual conflicts of interest.** Examples include:
 - You hold a second job that is in the similar line of business as the Company.
 - You invest (or have family and friends invest) in a competitor or a company with which we do business.
 - You receive gifts or entertainment from suppliers that does not comply with NFE policies or the supplier's own policies.
 - You direct business to a supplier that is owned or controlled by family members or close friends.
 - You use NFE resources, equipment, computers, or time for the benefit of your personal business.
- Disclose any potential or actual conflicts to your manager and Compliance.
- Get written approval from Compliance before accepting any Board position with an NFE supplier, competitor, or customer.

We build good relationships with our suppliers

Our commitment

We value our suppliers because they assist us in meeting customer obligations. We choose our suppliers carefully by vetting them in accordance with NFE policies and procedures. Our suppliers must adhere to the standards set forth in this Code.

Your responsibilities

- Read, understand, and follow Company procurement policies and procedures.
- Communicate NFE's expectations and monitor supplier performance.
- Contact Compliance immediately if you learn or suspect that a supplier is acting in a manner that is inconsistent with our Code.

We comply with international trade laws

Our commitment

Because we conduct business across the globe, we must comply with all international laws regulating trade, as well as local import and export laws and regulations. In general, these laws relate to: (i) embargos and sanctions of entities, individuals, or countries; (ii) necessary licenses and permits applicable to imports and exports; and (iii) boycott requests.

Your responsibilities

- Know with whom you are doing business.
- Be alert to commercial documents requesting a boycott of a certain country and report all such requests to Compliance immediately.
- **Ask questions.** The international trade laws are very complex and can change quickly, so be sure to contact Compliance with any questions.

We have zero tolerance for bribery and corruption

Our commitment

We comply with anti-bribery and corruption laws wherever we do business. We neither pay bribes or provide anything of value that may influence (or appear to influence) the judgement or actions of another; nor do we turn a blind eye to suspicious acts of bribery or corrupt conduct. In addition to our own actions, we are responsible for the actions of third parties if they make corrupt payments on our behalf.

Your responsibilities

- Read, understand, and comply with Company policy and procedures as well as the applicable laws governing anti-bribery and corruption.
- Minimize risks associated with third parties who conduct business on NFE's behalf.
- Contact Compliance if you have questions.

Question: I am a NFE commercial development manager. I hired a business development advisor in a Latin American country to help facilitate meetings with the Minister of Energy (MOE) regarding the potential construction and operation of a LNG terminal. The advisor informs me that there is interest from the MOE to move forward and we should hear something definitive in a month. A few weeks later, the advisor submits an expense reimbursement request with a line item called "Orlando customer meeting." You call the advisor to inquire about the reimbursement request, and learn that the advisor paid for the MOE's family vacation to Orlando. Should I approve?

Answer: No, you should not approve. You should report this matter to Compliance immediately. Under the anti-bribery laws, NFE is likely responsible for the acts of the advisor. The advisor's decision to pay for the MOE's family vacation will be viewed as an improper payment made to help NFE obtain the LNG project contract.

Question: NFE is developing an LNG terminal in Africa and you are the development leader. Certain permits are required from the Port Authority before construction can begin. While visiting the Port Authority, the manager tells you that the paperwork you submitted for the permits are incomplete, but that he will immediately approve them if you pay him \$500.00. What should I do?

Answer: You should ask what documents are needed to complete the application, and then politely decline to make the payment. Under the anti-bribery laws, the payment to the Port Authority manager is an improper payment and you should report the matter to Compliance immediately.

We know the rules about gifts and entertainment, sponsorships, charitable donations, social and political contributions

Our commitment

We believe in building good relationships with our customers, suppliers, and the local communities where we work. We use good judgment and discretion when giving or receiving gifts and entertainment. Sponsorships, charitable donations, and social and political contributions on behalf of the Company require pre-approvals.

Your responsibilities

- Read, understand, and comply with [NFE's Gifts and Entertainment Policy](#), and its policies and procedures regarding sponsorships, charitable donations, social and political contributions.
- **Do not give or receive lavish gifts or entertainment.** Avoid receiving or giving gifts and entertainment that may be perceived as improperly influencing a decision by you or a customer.
- If you have questions, ask your manager or Compliance.



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