



Control Number: 30240



Item Number: 2778

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
FILING CLERK



December 29, 2016

Central Records
Public Utility Commission of Texas
1701 N Congress
Suite 8-100
Austin, TX 78701

RE: Project Number 30238, Annual Report on Historical Underutilized Businesses (HUB), and Project Number 30240, Report of Workforce Diversity and Other Business Practices (WFD) for the year ended 12/31/2016

Dear Sir or Madam:

Enclosed please find the annual report on Historical Underutilized Businesses (HUB) in compliance with Texas Government Code § 481.191(4) and the Report for Workforce Diversity and Other Business Practices in compliance with PURA § 52.256(b) and P.U.C. Subst. R. § 26.85. NextEra FiberNet, LLC dba FPL FiberNet is also providing information about its procurement policy and its Minority and Women Owned Business Initiative.

A copy of this filing has been sent to the Governor, the Lt. Governor, The Speaker of the House, Mexican American Legislative Caucus, Texas Legislative Black Caucus, and Texas Senate Hispanic Caucus.

If you have any questions concerning this filing, or need additional information about NextEra FiberNet, LLC, please contact me at 305-552-2018.

Sincerely,

A handwritten signature in cursive script that reads "Lourdes Caballero".

Lourdes Caballero
Controller

Enclosures

2778

A handwritten number "2778" is written in the bottom right corner. To its right is a large, stylized graphic consisting of many thin, parallel lines radiating from a point, resembling a fan or a burst of energy.

[illegible]

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WORKFORCE AND SUPPLIER DIVERSITY FORM
HUB/SMALL BUSINESS PROCUREMENT AS A PERCENTAGE OF TOTAL COMPANY PROCUREMENT

Actual % = [Total HUB(1) procurement + Total Small Business(2) procurement]/Total Company procurement		Actual % for Previous FY	Actual % for Current FY	Percentage Change
Construction Contracts (3)				%
Commodities Contracts (4)				%
Other Services (5)				%
Professional Services Contracts (6)				%
Major Equipment (7)				%
Other (8)				%

(1) **HUB** -- Pursuant to Texas Government Code § 481.191(4), HUB means: (A) a corporation formed for the purpose of making a profit in which at least 51 percent of all classes of the shares of stock or other equitable securities is owned by one or more persons who are members of certain groups, including black Americans, Hispanic Americans, women, Asian Pacific Americans, and American Indians; (B) a sole proprietorship formed for the purpose of making a profit that is 100 percent owned, operated, and controlled by a person described by Paragraph (A) of this subdivision; (C) a partnership formed for the purpose of making a profit in which 51 percent of the assets and interest in the partnership is owned by one or more persons described by Paragraph (A) of this subdivision. Those persons must have proportionate interest and demonstrate active participation in the control, operation, and management of the partnership's affairs; or (D) a joint venture in which each entity in the joint venture is a historically underutilized business under this subdivision.

(2) **Small Business** -- Pursuant to Texas Government Code § 481.191(6), Small Business means a corporation, partnership, sole proprietorship, or other legal entity that: (A) is domiciled in this state; (B) is formed to make a profit; (C) is independently owned and operated; and (D) employs fewer than 100 full-time employees.

(3) **Construction** -- Construction done by general contractors and special trade contractors which includes new work, additions, alterations, reconstruction, installations, repairs, remodeling, renovating, and repair of office buildings. Heavy construction other than buildings such as pipelines, communication and power lines, sewer and water mains, asphalt and concrete construction of roads, trenching, cable laying, conduit construction, land clearing and leveling.

(4) **Commodities** -- All materials, goods or tangibles purchased to conduct business, not including fuel or purchased power contracts and major equipment purchases and rentals.

(5) **Others Services** -- All specialty work, special circumstances that required contract labor, special consultants or other non-defined services. Examples include audio/visual, staffing services, landscaping, forestry, tree trimming, art and decorative services, janitorial, travel/lodging, automotive repair, and photography.

(6) **Professional Services** -- Contracted professional services which include legal, consulting, health, engineering, accounting, advertising/marketing, architectural, real estate, computer services, research and analysis, education/training, insurance, surveying services, weather services, environmental, financial, etc.

(7) **Major Equipment** -- Includes all major equipment purchases and rentals including but not limited to transmission and distribution equipment, power plant equipment, substation equipment, heavy construction equipment, fleet requirements, etc.

(8) **Other** -- Any commodity or service not covered by the above categories.

WORKFORCE AND SUPPLIER DIVERSITY FORM COMPANY INITIATIVES

Describe Specific Initiatives:

NextEra FiberNet, LLC dba FPL FiberNet ("FPL FiberNet"), together with its parent company, continues to train its managers and supervisors on the terms of the company's policies and procedures to ensure workforce and supplier diversity, equal employment/ contracting opportunity and a workplace free from harassment. FPL FiberNet expects all employees to comply fully. In addition, the company has strategically focused its recruiting efforts to work through organizations that reach minority populations, such as career fairs.

Assess Specific Initiatives:

The company believes that its training protocols with respect to workforce and supplier diversity are effective and well-implemented; however, FPL FiberNet recognizes that the goal of ensuring such diversity is a continuing challenge. For this reason, FPL FiberNet will continue to evaluate its existing programs and pursue incremental strategies to support its diversity efforts. The company has found that its use of strategic channels, e.g., career and vendor fairs, to more effectively access potential employees as well as small and minority-run businesses is productive.

Describe Plans for Upcoming Year:

FPL FiberNet intends to fairly and consistently enforce its policies regarding diversity, equal employment and contracting opportunity and anti-harassment. The Company is committed to on-going review of its diversity programs and their results to ensure progress and identify other channels by which to achieve these goals. In particular, the company will explore reasonable options for identifying small and historically underutilized businesses that may be consider for future business opportunities.

FPL FiberNet notes that it anticipates a change to its ownership early in 2017, pursuant to a pending transaction.¹ The Company does not expect this ownership change to alter its practices or its policy approach to diversity, equal employment and contracting opportunity and anti-harassment as just discussed.

State Specific Progress Made under the Plan the Company is Filing:

FPL FiberNet has established a solid foundation to support the company's commitment to diversity in employment and contracting. The parent company policies under which FPL FiberNet operates provide clear direction in this regard, which is enforced by the thorough and consistent on-going training of all managers noted above. This is further supported by annual review of results in the area of workforce and contracting diversity from which revised and incremental strategies will be developed.

¹ See Application of Crown Castle Operating Company and NextEra FiberNet, LLC dba FPL FiberNet for an Amendment to Service Provider Certificate of Operating Authority; Case 46601 (filed Nov. 21, 2016).

SMALL UTILITIES HUB USE REPORT (Texas purchases)

Utility: _____

MBE Procurement	Construction	Commodities	Other Services	Professional	Major Equipment	Other	Total HUB
	Expenditures	Expenditures	Expenditures	Expenditures	Expenditures	Expenditures	Expenditures
African American Male	0	0	0	0	0	0	0
African American Female	0	0	0	0	0	0	0
Total African American	0	0	0	0	0	0	0
Asian American Male	0	0	0	0	0	0	0
Asian American Female	0	0	0	0	0	0	0
Total Asian American	0	0	0	0	0	0	0
Hispanic American Male	0	0	0	0	0	0	0
Hispanic American Female	0	0	0	0	0	0	0
Total Hispanic American	0	0	0	0	0	0	0
Native American Male	0	0	0	0	0	0	0
Native American Female	0	0	0	0	0	0	0
Total Native American	0	0	0	0	0	0	0
Total MBE	0	0	0	0	0	0	0
MBE Total (Male/Female Minority)	0	0	0	0	0	0	0
WBE Total (Non-Minority Female)	0	0	0	0	0	0	0
Total MBE & WBE Procurement	0	0	0	0	0	0	0
Total Unknown Status Procurement (1)	0	0	0	0	0	0	0
Total Non-Fuel Procurement (2)	0	0	0	0	0	0	0
Total Fuel and Purchased Power Procurement (electric only)							0
Total Non-Fuel, Fuel, and Purchased Power Procurement							0

(1) Vendors for whom HUB status is not directly known.
 (2) Expenditures for goods and services from vendors not including wages, benefits, and other non-negotiable goods and services such as taxes and postage. Includes MBE/WBE and Unknown Procurement

Reporting Period: Oct. 1, 2015 through Sep. 30, 2016
 Address: 9250 West Flagler Street
 City: Miami, FL 33174
 Reporting Date: State: FL Zip: 33174
 Contact person: Lourdes Caballero
 Phone: 305-552-2018 Fax: 305-229-5820

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Legislative Contacts for Workforce Diversity Reporting

Electric and Telecommunications

Governor's Office
P.O. Box 12428
Austin, TX 78711

Lt. Governor's Office
P.O. Box 12068
Austin, TX 78711

Texas House of Representatives
P.O. Box 2910
Austin, TX 78768-2910
Attn: Speaker of the House of Representatives

Rep Trey Martinez-Fischer
Mexican American Legislative Caucus
202 W. 13th Street
Austin, Tx 78701

The Honorable Sylvester Turner
Texas Legislative Black Caucus
1108 Lavaca St., Suite 110 PMB 171
Austin, TX 78701-2172

The Honorable Carlos Uresti
Texas Senate Hispanic Caucus
P.O. Box 684754
Austin, TX 78768

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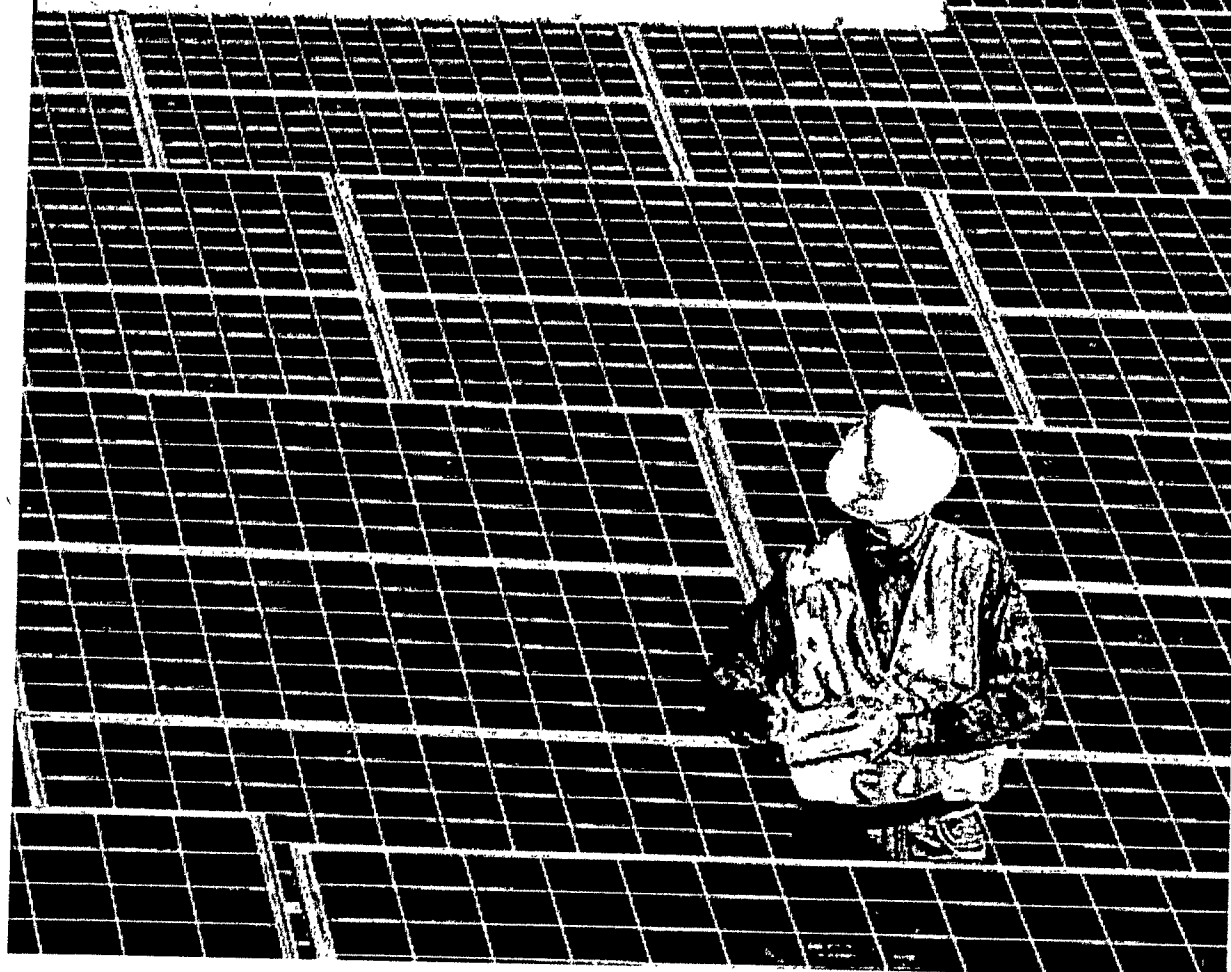
The PUC makes extensive use of Adobe's Acrobat PDF format. [Download a free copy of the Acrobat Reader here.](#)

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General Information: 512-936-7000 Email: web@puc.texas.gov Email Subscriptions Survey: Customer Satisfaction

2016

CORPORATE RESPONSIBILITY
EXECUTIVE DIGEST
CORPORATE PROFILE

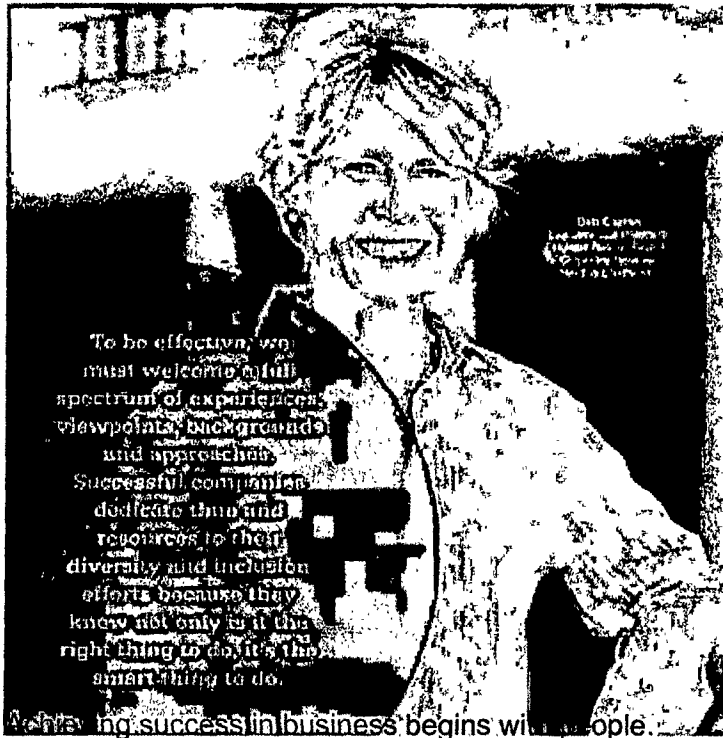
SOLVING AMERICA'S ENERGY CHALLENGES SUSTAINABLY AND RESPONSIBLY



Delivering for OUR EMPLOYEES



Diversity and Inclusion



As one of the nation's premier energy companies, we at NextEra Energy are committed to recruiting, developing, rewarding and retaining great people at all levels. A key part of that commitment is to attract and maintain a diverse workforce that can help us meet the continually evolving needs of our customers and others with a stake in our success. To reinforce our commitment, we continue to develop and implement corporate-wide diversity and inclusion training for all of our employees and further strengthen our Corporate Diversity Council and Employee Resource Groups (ERGs).

At NextEra Energy, we define diversity very broadly. We provide an inclusive work environment that is free from discrimination and harassment on the basis of race, color, age, sex, national origin, religion, marital status, sexual orientation, gender identity, gender expression, genetics, disability or protected veteran status. We also appreciate generational differences in thought, style, technical and functional capabilities or leadership. When talented employees from varied backgrounds are engaged and contributing to our business success, we all benefit.

NextEra Energy Honored As a Top U.S. Company for Diversity and Inclusion



ERG & Council Honors Award™, which recognizes, honors and celebrates the outstanding contributions and achievements of Employee Resource Groups and Diversity Councils. Competing with more than 500 other participants – all judged on their programs' results, management commitment, measurement and accountability, and communication and education – we are the only large U.S. electric utility company to receive a Top 25 ranking in 2015.

"NextEra Energy's Corporate Diversity Council scored high in the areas of building a culture of inclusion, demonstrated management commitment, measurement, and workforce and member education," said Debbie Smith Rayford, executive director of the Association of ERGs and Councils. "That the company made the Top 25 on its first application is impressive."

NextEra Energy Goes "Above and Beyond" for Military Employees

For the second year, NextEra Energy received the Above and Beyond Award from the Florida state committee of the Department of Defense's Employer Support of Guard and Reserve (ESGR) program. This award recognizes our policies, practices and programs that go "above and beyond" in supporting employees who serve in the National Guard and Reserve, their families and the military community.

Today, as key elements of our Diversity and Inclusion Strategic Plan, we're expanding community involvement and networking activities with veterans organizations. We're establishing outreach plans, partnerships and memberships with professional and college organizations that represent and support veterans. And we're strengthening apprenticeship programs to include veterans.

Corporate Diversity Council and Employee Resource Groups

NextEra Energy's Corporate Diversity Council provides strategic oversight, guidance, and direction to corporate-wide diversity and inclusion initiatives by ensuring alignment with business objectives and collaboration across business units. The council is also responsible for overseeing activities of our 11 Employee Resource Groups, such as developing strategies to leverage and engage the groups within business units, modeling inclusive behaviors through active mentorship, and building diverse and inclusive leadership teams.

More than 1,300 of our team members are actively engaged in these Employee Resource Groups:

AAPEG
African American Professional Employee Group

WiE
Women in Energy

HOLA
Hispanic Organization of Latin Americans

NAYGN
North American Young Generation in Nuclear

APEX
Asian Professionals in Energy Exchange

VETNEXT

APD
Allies for People with Disabilities

**NextEra of
Pride & Allies**

WIN

GP
Generation Professionals



- At events like this during 2015 Pride Month, employee resource groups provide opportunities for team members to meet colleagues with shared interests, develop their careers and help the community.

Encouraging Diversity through Recruiting Practices

Our Talent Acquisition team partners with key veteran and diversity organizations, both regional and national, targeting many diverse groups including women, African Americans, Hispanics and people with disabilities, with a focus on attracting qualified diverse talent to become part of our great company.

Professional Diversity Organizations and Events: In 2015, we attended 37 career events with diverse organizations, including the American Association of Blacks in Energy, the National Black MBA Association, the National Society of Hispanic MBA Association, the National Society of Women Engineers, LatPro Diversity Bilingual Career Fair, American Indian Science and Engineering Society, Equal Opportunity Publication and many others.

Military Recruiting and Partnerships: In partnership with the Non-Commissioned Officers Association (NCOA), the Transition Assistance Program (TAP), The Navy Fleet and Family Support Center, VetReady and other military organizations, our recruiting team participated in 40 military/veteran career events throughout the country in 2015.

College Recruiting and NEXT Intern Program: We're always looking for the best and the brightest college students and graduates to help us shape the future of clean and renewable energy. This year, our recruiting team attended more than 50 on-campus events. We look to partner with schools that have diverse populations in addition to top programs. By affording students relevant work experience on challenging projects and assignments, the internship program provides the opportunity to develop new talent and test candidates for a right 'fit' for potential full-time employment in the future.



NEXtera[®]
ENERGY 

Code of Business
Conduct & Ethics

We Treat People with Respect

WE VALUE OUR FELLOW EMPLOYEES

You have an important role in building and sustaining an inclusive, diverse work environment. To succeed in this, you must show respect for various backgrounds, ideas, and experiences. Therefore, we want to assure that every one of you is accepted and rewarded according to your unique efforts and contributions. In order to be successful in this, each of you must be dedicated to our Company's Equal Employment Opportunity effort.



To encourage high performance among our workforce, our Company maintains an Equal Employment Opportunity (EEO) group in the human resources department. This group works to ensure a fair and inclusive work environment and to deliver quality services, with equal respect, for all.

For more information, refer to the *Equal Employment Opportunity* policy.

Discrimination and harassment

NextEra Energy recognizes that employees are its most valuable asset. Accordingly, we do not make employment-related decisions or discriminate against anyone on the basis of race, color, age, religion, sex, sexual orientation, gender identity or expression, national origin, ancestry, citizenship status, physical or mental disability, marital status, genetics, veteran status, or any other characteristic protected by law.

Employment-related decisions include: hiring, promotions, transfers, recruitment, discipline, termination, compensation, and selection for training programs.

Our Company does not tolerate harassment, which can take many forms. Harassment is any verbal remark, physical advance, or visual display that makes another feel intimidated, offended, or belittled. This treatment may come from fellow employees, supervisors, business partners, or customers. Harassment can affect both males and females; anyone can be a victim. Harassment is a form of discrimination and is never ignored by NextEra Energy.

Harassment can be sexual or non-sexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors, or inappropriate comments about another's appearance. Non-sexual harassment may include offensive comments, jokes, or pictures related to race, religion, ethnicity, gender, age, or any other protected characteristic. To keep harassment out of NextEra Energy's environment, you must be sure that your comments and actions are always appropriate and respectful.

If you have experienced or observed any discriminatory or harassing behavior, please discuss the situation with your manager, human resources, the manager of diversity and inclusion, or call the Employee Relations Hotline at 888.552.1055 immediately.

For more information, please see the policies on *My HR Direct*.

Q:

Sierra was adopted at eight months of age. Although born in China, she was adopted by U.S. citizens and has lived her entire life in America. Her speech and habits closely resemble the friends she grew up with in Pennsylvania. She works in marketing for NextEra Energy and enjoys her job. There is, however, one co-worker who is not enjoyable. Mark, another member of her team, thinks of himself as a comedian. When he sees her coming, rather than giving her a polite greeting, he speaks to her in broken English, imitating old Kung-Fu movies. He thinks his behavior is hilarious, but Sierra finds it humiliating. She has never been one to create drama, but part of her thinks she should tell her manager about how uncomfortable these jokes make her feel.

A:

Sierra is correct that Mark's behavior is unacceptable at NextEra Energy. His imitation of Asian dialect could be perceived as discriminatory, harassing behavior. He may think it is all in good fun, but he is actually making Sierra feel inferior and embarrassed. Sierra should attempt to talk to Mark about the situation. If Sierra cannot resolve the situation with Mark, or is embarrassed to talk to Mark directly, Sierra should discuss the situation with her manager, human resources, the manager of diversity and inclusion, or contact the EEO Hotline at 888.552.1055.

Employee privacy

As an employee, you provide sensitive personal, medical, and financial information to our Company. NextEra Energy is committed to securing this information and protecting your personal privacy.

"Sensitive employee information" may include: benefits, tax or compensation information, medical records, contact information, and employee information such as resume, transcript, performance evaluation materials, or interview notes.

To access the sensitive information of your fellow employees, you must have specific authorization and a business need to do so. If the nature of your job requires you to come into contact with this information, you must treat it with special care. Keep it secured from loss or theft, and use it only as is necessary, according to the law and Company policies and procedures. When sending personal and confidential data to an outside source, use all reasonable safeguards against loss, destruction, or inadvertent disclosure.

If you have additional questions on protecting or disposing of employee data, consult with your manager. For more information, refer to the *Employee and Personnel Files* policy.

Workplace health and safety

At NextEra Energy, we work diligently, but safely at all times. No job is ever so important that you should allow or create unnecessary dangers to yourself, your fellow employees, our customers, our Company, or to others generally. NextEra Energy maintains a comprehensive safety program geared to the prevention of accidents.

To accomplish our safety goals, you should learn the safety laws and rules that apply to your work – whether that work is being done in the United States or abroad, in an office, in a nuclear or other plant site, or while in transit. For instance, if your work requires using or disposing of hazardous materials, be sure to wear protective gear and closely follow all laws and procedures that apply to the particular task. Likewise, if you operate a company vehicle or a vehicle issued to you by NextEra Energy, you must operate it only as directed. Be sure to follow all traffic rules, including our Company's policy of no texting while driving.

For more information, refer to *Using Vehicles for Business Purposes* and *Use of Communication Devices While Driving* policies.

Ultimately, all employees are responsible for their own safety. Every employee must, for the good of all, abide by Company procedures and safe work practices. Always use protective equipment when required or necessary. In particular, the Company is committed to the highest standards of nuclear safety in the design, operation, and maintenance of our nuclear power plants. You are required to bring to the attention of management any concerns about the safety of design, operation, or maintenance of our nuclear plants. You may voice your concerns through the Nuclear Safety Employee Concerns Program by contacting the Employee Concerns Program offices or by calling 800.645.5105. You can also contact the Nuclear Regulatory Commission.

For more information, refer to the *Reporting Nuclear Power Plant Deficiencies* policy.

Operating safely also means that working under the influence of alcohol, illegal drugs, or misused prescriptions or over-the-counter medications is strictly prohibited. In addition, you may never use, possess, transfer, or sell such substances during working hours or while on NextEra Energy premises. If alcohol is transferred in a sealed container as a gift or is used in moderation at an authorized NextEra Energy event, such limited use is allowed.

For more information, please see the *Controlled Substances and Alcohol Abuse* policy.

You have a duty to report any unsafe condition through one of our reporting resources. NextEra Energy has an online system – the Safety Information Management System (SIMS) – that is used to document and investigate unsafe conditions. Information can be found on our Corporate Safety website, located [here](#).

For more information, refer to *Reporting an Unsafe Condition or Act* policy.

A safe environment is also free from all forms of violence. An act of violence can take many forms. It can be a verbal or physical threat, an act of intimidation or abuse, or a blatant physical assault. Whatever form it takes, violence has no place in our Company. If you witness an act of violence between any parties working on the Company's behalf, you have a responsibility to report it right away. Corporate security and a member of management in your area will handle the situation. If the incident escalates and you feel an immediate threat, call Corporate Security at 561.694.5000.

Additionally, if you are arrested, charged, or indicted for the commission of, or participating in, a felony or misdemeanor (including criminal traffic violations) either on or off duty, you must inform Corporate Security at 561.694.5000 within 24 hours of the arrest, or within 24 hours of release from jail if incarcerated as a result of an arrest, or prior to the start of your next scheduled shift or work day, whichever is earlier.

For additional information about this section, consult the *Controlled Substances and Alcohol Abuse* policy and the multiple *Safety and Security* policies that are available to you.

Q:

Jermaine drives a Company vehicle. One morning, he leaves his house late and is running behind in getting to his first site. While driving, he gets a text from his manager, asking a question about the morning's work. He knows his manager thinks he has parked and has begun working, making it easy for Jermaine to text an answer. Not responding will tip his manager that he is behind schedule and not on task. He knows it is against the Company safety policy to text while driving, but a short answer to his manager would save him grief later. What could it hurt - just this once?

A:

There is no circumstance that makes it okay to text while driving. Employees with Company cars must follow all traffic laws, including NextEra Energy's policy of no texting while driving. If Jermaine is near his assigned work site, he should wait to park the car before texting.

WE COMPETE WITH INTEGRITY

At NextEra Energy, we believe in competing vigorously, but we never sacrifice our integrity to win business. This means we comply with all applicable antitrust and competition laws, wherever we do business. While they can be complex, these laws are meant to ensure a level playing field and fair competition in the marketplace. In practice, these laws require that we make independent business decisions, never engaging in unfair business practices, scheming with our competitors or making other fraudulent business arrangements.

You must take special care not to discuss any of the following with our competitors:

- Pricing, costs, or marketing strategies
- Market or customer distribution
- Bids for contracts

If a competitor attempts to talk to you about any of these topics – or invites you into any other anti-competitive behavior – you should stop the conversation immediately and inform a compliance officer. Keep in mind that even the appearance of anti-competitive behavior can cause trouble for our Company. Be mindful of situations that could lead to questionable conduct, such as trade shows or conventions.

Competing with integrity also means we always gather competitive information ethically and legally. We never misrepresent ourselves in order to get information. In addition, we must never ask the former employees of our competitors – even if they now work for NextEra Energy – to share confidential data with us.

Q:

Todd is excited to represent NextEra Energy at the Green Power convention this year. He has been with the Company for 10 years and is excited about all the progress being made in more environmentally friendly power resources. He knows that making strides in this area is the key to future success. For months now, Todd has served on a focus group, planning how to expand NextEra Energy's green energy efforts. When he arrives at the convention center, Todd can hardly believe that his college roommate is seated just two rows in front of him representing another green energy company. He thinks to himself, "I should ask Jeff to go to dinner after this is over. We can reminisce, catch up, and maybe even brainstorm about what we hear today. This will be awesome."

A:

Todd is correct that expanding green energy offerings is important to NextEra Energy. However, Todd is incorrect in thinking that talking to a competitor's employee about ideas and strategies is a good idea. While Todd is welcome to catch up on personal matters with his old buddy, he should not in any way talk about NextEra Energy customers, strategies, contracts, or projects in development. Likewise, Todd should not ask Jeff any inappropriate questions in an attempt to get information about Jeff's company and its advances in green energy.

WE TREAT OUR CUSTOMERS AND SUPPLIERS FAIRLY

At NextEra Energy, we let integrity and honesty guide our interactions with our customers and our suppliers. We pride ourselves on the quality of our products, services, and operations. We are honest about our work. We are committed to doing business with suppliers who provide goods and services that meet or exceed our high standards. If you experience an issue with supplier performance, contact the vice president, integrated supply chain at once so that the issue may be addressed.

We do not make misleading, false, or exaggerated claims about our services. We carefully and accurately represent the quality, features, and availability of our products and services and ensure that all of our marketing and promotional materials contain an accurate discussion of our offerings.

WE PROTECT OUR THIRD PARTIES' INFORMATION AND PROPERTY

The third parties we work with – customers, suppliers, contractors, consultants, and business partners – frequently share their confidential and IP information with NextEra Energy. We protect that information just as carefully as we protect our own. In fact, our integrity depends on it. This helps create an environment of trust with our partners and ensures that NextEra Energy maintains its compliance with all data protection and privacy laws.

Follow the same security measures for our third parties' confidential and IP information that you do for your own sensitive Company information. Never disclose such information without ensuring that you have the authority to do so, and if such disclosure is to another third party, also ensure that you have a signed nondisclosure agreement with that other third party. Be especially careful when preparing advertising or promotional materials or when using the name or printed materials of another company. Materials belonging to others may not be used, posted on, copied, or sent through the Company's systems without permission from the copyright holder.

Those of you who work on or around our customers' property have a special obligation. In the event that damage is incurred while you are providing service to a customer, damage, if unavoidable, should be kept to a minimum and the property restored when the work is finished.

For more information, refer to the *Damage to Non-FPL Property* policy.