



Whistleblower and Anti-Retaliation Policy			
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Comments:			

Whistleblower and Anti-Retaliation Policy

1 PURPOSE

The AES Corporation (“AES”) is committed to maintaining a work environment where AES people can ask questions, voice concerns, and make appropriate suggestions regarding the Company’s business practices. AES people are strongly encouraged to raise questions and to report concerns about unlawful, unethical, or undesirable business conduct. AES will not tolerate retaliation against any AES person for seeking advice or making a good faith report of improper behavior.

2 SCOPE

This Whistleblower and Anti-Retaliation Policy (the “Policy”) applies to all AES people worldwide, as well as all contractors, contingent and temporary workers, suppliers, and other stakeholders associated with AES.

3 REQUIREMENTS

At AES, we recognize the importance of fostering an environment where employees feel comfortable raising concerns about potential misconduct or violations of company policies and legal regulations without fear of retaliation. This Policy outlines the procedures for reporting such concerns, ensuring confidentiality and protection for whistleblowers as well as setting expectations for any individual who reports a concern.

Retaliation against individuals who report in good faith or participate in investigations is strictly prohibited and will result in disciplinary action. Our commitment to integrity and transparency is paramount, and we will uphold these principles in all aspects of our operations

3.1 Reporting Mechanism and Procedure

AES people who have concerns about potential misconduct or violations of company policies or legal regulations are encouraged to report such concerns through any of the following channels:

- Directly to their immediate supervisor or manager
- To their local Compliance Officer
- To the corporate Ethics and Compliance Department
- To the Human Resources Department
- To the Legal Department
- Through the AES Helpline, accessible online at aeshelpline.com; please see the web page for local telephone numbers

There may be circumstances where AES people do not feel comfortable reporting issues directly to management or where AES people do not feel that the concern they have raised has been adequately addressed. The AES Helpline allows AES people to report concerns anonymously or confidentially 24 hours-a-day, 7 days-a-week. AES has retained a third-party provider to accept and log all complaints and inquiries received via the AES Helpline mechanisms. Upon receipt of a complaint, the third-party provider notifies the Ethics and Compliance Department. No subject is too trivial for the AES Helpline.

Complaints addressed directly to the AES Board of Directors or to any Board committees or individual Directors will be forwarded to the Ethics and Compliance Department for appropriate treatment. In the event that such a complaint involves a member of the Ethics and Compliance Department, the complaint will be forwarded to the AES General Counsel for appropriate treatment.

3.2 Protection Against Retaliation

AES is committed to maintaining a work environment that is free of harassment, intimidation, discrimination and retaliation for engaging in protected activity such as reporting violations or participating in an investigation pertaining to alleged violations of laws, the AES Code of Conduct, or any Company policies or procedures. Crucial to these objectives is promoting an atmosphere where employees and others feel safe to engage in frank, honest communication – raising questions or concerns at any time without fear of retaliation.

AES strictly prohibits any form of retaliatory action against employees who report concerns in good faith or ask questions, participate in an investigation, refuse to participate in suspected improper or wrongful activity, or exercise workplace rights protected by law (in each case “Protected Activity”).

Retaliation can take many forms, including but not limited to:

- Termination of employment
- Demotion
- Salary reduction
- Negative performance evaluation
- Denial of benefits or opportunities for advancement
- Intimidation or harassment
- Failing to give equal consideration in making employment decisions or to make impartial employment recommendations
- Adversely impacting working conditions or otherwise denying any employment benefit to an employee
- Creating a hostile or intimidating work environment.

Any employee found to have engaged in retaliation against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

Furthermore, AES prohibits retaliation even if the concerns raised are not substantiated following an investigation. However, an employee may be subject to disciplinary action if the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

This Policy does not exempt AES people from the consequences of their own misconduct or inadequate performance, and self-reporting such issues is not Protected Activity.

3.3 Investigation of Complaints

All complaints brought to the attention of the Ethics and Compliance Department will be fully investigated. Upon receiving a report, the Ethics and Compliance team will promptly and thoroughly investigate the concerns raised, including involving other departments as necessary

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(e.g., Human Resources or Legal). Investigations will be conducted impartially, with the utmost confidentiality, and in compliance with applicable laws and regulations. To the extent possible and permitted by law, AES will maintain the confidentiality of whistleblowers and the information provided during the reporting and investigation process.

3.4 Retention of Complaints

The Ethics and Compliance Department maintains a confidential electronic database to log, categorize, and track to conclusion all complaints brought to its attention irrespective of how the matter was initially reported. The contact management system is hosted and maintained by the same third-party that operates the AES Helpline. Access to the contact management system is password-protected and restricted on a need-to-know basis. The underlying data is fully encrypted and housed at a secure, protected location that is physically separate from the AES network.

4 CONTACTS

If you have questions about this Policy or would like to report a suspected violation, please contact the AES Chief Ethics and Compliance Officer, your local Compliance Officer, or any member of the AES Ethics and Compliance Department. You may also contact the AES Helpline online at www.aeshelpline.com or by calling the telephone number printed on the Helpline poster at your business. The AES Helpline is available worldwide 24 hours per day / 7 days per week. Reports to the AES Helpline may be made anonymously.

5 RELATED POLICIES

Title	AES Document Number
AES Code of Conduct, <i>The AES Values: From Words to Action</i>	AES 10-01
AES Anti-Harassment and Discrimination Policy	

Revision History

Date	Author	Change Description