

**NEXTERA ENERGY, INC.**

**CODE OF BUSINESS CONDUCT & ETHICS**

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## **INTRODUCTION**

NextEra Energy, Inc. expects all representatives of the Company and its subsidiaries (collectively, the “Company”) to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities and to comply with all applicable laws, regulations, and Company policies. This Code of Business Conduct & Ethics (the “Code”) applies to all representatives of the Company, including directors, officers and employees, temporary employees and all others who work with or represent us, directly or indirectly.

In addition to this Code, compliance standards and procedures include policy manuals, procedure manuals, safety manuals, employee handbooks and federal, state, and local laws, rules and regulations. Employees should review the materials available on eWeb for more information.

In addition to the Code, senior executive and financial officers are also subject to a separate Code of Ethics for Senior Executive and Financial Officers, which is available in the Governance section of the NextEra Energy website.

## **LEGAL & ETHICAL RESPONSIBILITIES TO THE COMPANY**

### **Responsibilities for Compliance**

It is your responsibility to read and understand this Code and to comply with it in both letter and spirit. Although this Code addresses a wide range of business, legal, and ethical matters, it cannot anticipate every issue that may arise. In many situations, your judgment and common sense will provide sufficient guidance; if something seems unethical or improper, it probably is. But, if you are unsure of what to do in any situation, you should seek additional guidance and information before you act by contacting your supervisor, the head of your Business Unit or a Compliance Officer (who are listed under “Compliance Assistance” at the end of this Code).

It is also your responsibility to report any actual or suspected violation of a law or regulation, any actual or suspected fraud, and any other violation or suspected violation of this Code. You may do so by contacting a Compliance Officer. You may also do so by calling our 24-hour “Hotline” at 888.906-9NEE (888-906-9633) or contact any member of the Audit Committee of the Board of Directors of NextEra Energy (see “Compliance Assistance”). You may choose to remain anonymous.

The Company prohibits any retaliatory action against any individual for raising legitimate concerns or questions regarding compliance with this Code or other ethics matters.

### **Records and Reporting**

All records, data, and information owned, maintained and used by the Company must be accurate and complete. You are personally responsible for the integrity of the information, records and reports under your control. Records must be maintained in sufficient detail as to reflect accurately the Company’s transactions. All financial statements must be prepared in accordance with generally accepted accounting principles and fairly present in all material respects the financial condition and results of the Company. All reports filed with the Securities and Exchange Commission must not

contain any misstatement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading.

If you have any concerns or complaints regarding questionable accounting, internal accounting controls or auditing matters, you are encouraged to submit those concerns or complaints (anonymously, confidentially, or otherwise) to the Audit Committee of the Board of Directors which will, subject to its duties arising under applicable law, regulation and legal proceedings, treat such submissions confidentially. Such submissions may be directed to the attention of the Audit Committee or any director who is a member of the Audit Committee. A separate Whistleblower Policy has been adopted by the Company specifying additional procedures and protections for these types of concerns or complaints, copies of which may be obtained from a Compliance Officer.

Business records and other documents may become public through litigation, government investigations and the media. In this context, the Company or a third party may be in a position to rely on or interpret the document with the benefit of hindsight and the disadvantage of imperfect recollection. Accordingly, it is important that you avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This rule applies to documents and communications of all kinds, including e-mail and other electronic records and informal notes and memoranda.

Records must always be retained and destroyed according to the Company's record retention policies. The Company's retention policies are based on specific statutory and regulatory requirements, some of which are specific to a particular business operation. These retention requirements apply to all Company documents, including e-mail and other electronic records.

You must observe any “litigation holds” for records. Litigation holds are written instructions from the Law Department requiring that certain records be retained beyond normal retention periods for legal or compliance reasons. Specifically, it is unlawful to destroy, conceal, alter, forge or falsify any Company business or other record, document, or object (including email and other electronic records) for the purpose of obstructing or influencing any governmental or legal proceeding, investigation or lawsuit. Accordingly, you are prohibited from destroying any records that are potentially relevant to a violation of law, any currently pending, threatened or reasonably foreseeable litigation or any pending, threatened or reasonably foreseeable government or other investigation or proceeding.

You should consult immediately with the Law Department if you receive, as a Company representative, any summons, subpoena, inquiry, or other communication from a court, marshal, sheriff, government agent, regulatory agency, or any lawyer regarding the Company or any director, employee, customer, supplier, contractor or competitor. Always contact the Law Department before producing any documents, submitting to an interview, answering questions or responding to any request regarding litigation or an investigation.

### **Proper Use of Company Assets**

Protecting the Company’s assets, both tangible and intangible, against loss, theft, and misuse is your responsibility. These assets were acquired solely for the purpose of conducting the Company’s business. They may not be used for personal benefit, sold, loaned, given away, or disposed of except with proper authorization. Assets include, but are not limited to, cash, securities, business plans, customer information, supplier information, intellectual property (including computer programs, models and similar items), physical property (including equipment, vehicle, tools and supplies) and services.

Misappropriation of Company assets is theft and a breach of your duty to the Company. An employee engaging in such action is subject to immediate dismissal and prosecution, if applicable.

Computer software and information provided by the Company and loaded on your computer or other electronic device (including but not limited to a Blackberry or other personal communication device) is Company property. Licensed software or documentation must be used strictly in accordance with licensing agreements and must not be duplicated without permission. Additional information regarding Software, Copyright and License Compliance policies is available on eWeb. You are responsible for safeguarding logins and passwords which provide access to Company networks.

Internet access and all Company electronic communications systems, including but not limited to e-mail and voice mail, are made available to you only to conduct the Company's business and incidental non-solicitational use. Company systems are the property of the Company and all communications are subject to review by appropriate, authorized Company personnel at any time. Users have no expectation of personal privacy in their use of Company communications systems or information sent to or from or stored in Company communications systems.

You are prohibited from using the Internet, Intranet, IM or e-mail for transmitting communications, or releasing or accessing information, that violates applicable codes of conduct, including this Code, and FERC's Standards of Conduct, Affiliate Restrictions, Anti Manipulation Rules and Market Behavior Rules, and any other state and federal codes of conduct applicable to the Company, including those for utilities and their affiliates.

In addition, use of Company computer resources or communications systems for the following is prohibited: abusive or otherwise objectionable language; information which is illegal or obscene; messages which are likely to result in the loss of the recipients' work or systems; messages which defame or libel others; use which interferes with the

work of employees or others, including sexual or other harassment violative of applicable laws and Company policies; and solicitation of employees for any unauthorized purposes.

If you become aware of the theft or misuse of Company assets, immediately report the matter to your supervisor, your Business Unit Head, Corporate Security, or a Compliance Officer.

**Proprietary and Confidential Information**

You must retain in strictest confidence, and use solely for the benefit of the Company, all proprietary and confidential information relating to the Company which you acquire, directly or indirectly, in connection with your employment or association with the Company. Proprietary or confidential information about the Company may not be disclosed to anyone outside the Company without specific authorization by the Company or to other Company personnel unless they have a need to know the information.

Examples of proprietary and confidential information include, but are not limited to, any system, information or process that gives the Company an opportunity to gain an advantage over its competitors; nonpublic information about the Company's strategies, business plans, forecasts, operations, and results; nonpublic information about customers and vendors; nonpublic information about the Company's systems, technology, products and services; and employee medical and other records.

You are responsible for safeguarding all proprietary and confidential information under your control. This includes taking steps to ensure documents are produced, handled and discarded in a manner that minimizes the risk that unauthorized persons might obtain access to them. You should also ensure that access to work areas and computers is properly controlled. Also you should not discuss proprietary or confidential information in public places, such as restaurants or airplanes, or on cellular phones.

## **ADDITIONAL LEGAL & ETHICAL RESPONSIBILITIES**

### **Conflicts of Interest**

You must be sensitive to any activities, interests or relationships that might conflict, or even appear to conflict, with your ability to act in the best interests of the Company. Since it is impossible to describe every potential conflict of interest, the Company necessarily relies on you to exercise sound judgment and to adhere to the highest ethical standards. To assist you in this regard, a few of the more common situations in which a conflict of interest arises are described below.

Any activity, interest or relationship of yours that might constitute a conflict of interest must be disclosed in writing (using Form 372, which is available in electronic form on eWeb) to and approved by the Company prior to the time the situation arises whenever possible and, in any event, no later than when you first become aware of it. Conflict of interest situations involving members of the Board of Directors of NextEra Energy should be disclosed to the Board of Directors and the General Counsel; all other such situations should be disclosed to the person's supervisor and a Compliance Officer. If you are in doubt about a situation, ask a Compliance Officer.

A potential conflict of interest arises if you or any person having a close personal relationship with you (a "related person") has a direct or indirect interest in, or may derive a benefit from, or is employed by a business enterprise which does or seeks to do business with, the Company. However, a situation in which a related person is employed by a business enterprise that furnishes products or services to the Company and the general public at prices and terms generally applicable to all its customers, and whose compensation is not determined in whole or in part by reference to the amount of business done with the Company, would not be considered to give rise to a conflict of interest.

Also, ownership of less than 1% of the outstanding publicly-traded securities of a business enterprise doing, or seeking to do, business with the Company is not considered to be a conflict of interest.

A person with whom you have a close personal relationship means your spouse, parents, children, siblings, stepparents, mothers and fathers-in-law, sons and daughters-in-law, any person living in the same house with you or any business associate of yours.

You owe a duty to the Company to promote its business interests at every opportunity. Accordingly, you may not take for yourself a corporate opportunity that is discovered in the course of your employment or other association with the Company, nor may you compete with the Company. Among other things, you may not take for yourself opportunities that are discovered through the use of corporate property or information or your position, and you may not use corporate property or information for personal gain. Similarly, all copyrights, patents, trade secrets or other intellectual property associated with every idea, concept, technique, invention, process and work of authorship developed or created by you in the course of performing work for the Company belongs to the Company, and, if requested, shall be specifically assigned by you to the Company.

### **Gifts, Meals and Entertainment**

Neither you nor any person with whom you have a close personal relationship may accept gifts or anything of value (including meals and entertainment) from a vendor (existing or potential) or customer if that gift or other thing of value is, or could reasonably be considered to be, intended to influence your behavior toward that vendor or customer. Absent such circumstances, gifts may be accepted when permitted by applicable law if they are non-cash gifts of nominal value (\$250 or less, individually or in the aggregate) or customary and reasonable meals and entertainment at which the giver is present, such as an occasional business meal or sporting event. Travel or lodging may not be accepted unless previously approved by your Business Unit Head.

If you are offered money or a gift not in conformity with the exceptions noted above, or if either arrives at your office or home, you must report it to your supervisor in writing with a copy to a Compliance Officer.

### **Insider Trading**

Federal securities laws and Company policy prohibit a director, officer or other employee of the Company who is in possession of material, nonpublic information relating to the Company from directly or through family members or other persons or entities: (a) buying or selling securities of the Company or engaging in any other action to take personal advantage of that information or (b) passing that information on (“tipping”) to others outside the Company, including family and friends.

In addition, it is the policy of the Company that no director, officer or other employee of the Company who, in the course of working for the Company, learns of material, nonpublic information about a company with which the Company does business, including a customer or vendor of the Company, may trade in that company’s securities until the information becomes public or is no longer material.

It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered significant by an investor in making a decision to buy, hold or sell securities. Similarly, any information that could be expected to affect the Company’s (or another company’s) stock price, whether it is positive or negative, should be considered material.

Nonpublic information is information that has not been previously disclosed to the general public and is not otherwise available to the general public. Even after disclosure, information is still considered nonpublic until an adequate time has passed for the securities markets to absorb the information. As a general rule, information should not be considered absorbed until after the close of business on the first “trading

day” following the date of public disclosure of the information. A trading day is a day the New York Stock Exchange is open for trading.

This insider trading policy also applies to your family members who reside with you, anyone else who lives in your household, and any family members who do not live in your household but whose transactions in Company securities are subject to your control or influence.

It is also illegal to “tip” or pass on inside information to any other person if you know or reasonably expect that the person receiving such information from you will misuse such information by trading in securities or passing such information on further, even if you do not receive any monetary benefit from the tippee.

The foregoing is a summary of certain portions of the Company’s Policy on Securities Trading by Company Personnel which is available on the Company’s website at [http://www.nexteraenergy.com/pdf/policy\\_trading.pdf](http://www.nexteraenergy.com/pdf/policy_trading.pdf). You are expected to be familiar with, and to abide by, the complete policy.

## **Compliance with Other Laws, Rules and Regulations**

### **Federal Energy Regulatory Commission (FERC) Standards of Conduct, Affiliate Restrictions and Related Requirements**

FERC regulates transmission and wholesale sales of electric energy in interstate commerce. FERC exercises jurisdiction over many of the Company's subsidiaries, most notably Florida Power & Light Company ("Florida Power & Light") and NextEra Energy Resources, LLC ("NextEra Energy Resources") and their competitive marketing and energy affiliates. FERC carries out its regulatory responsibilities through a wide variety of rules, regulations, standards and enforcement policies. The Company is committed to full compliance with these regulatory requirements and policies.

FERC has promulgated certain standards of conduct (the "Standards of Conduct") which provide that marketing function employees of NextEra Energy cannot have access to non-public Florida Power & Light transmission function information not simultaneously disclosed to the public. Transmission information includes information about available transmission capability, price, curtailments, ancillary services, system maintenance, line outages, and transmission planning and system expansion. Florida Power & Light and its marketing affiliates, however, may have common senior officers and directors, as well as support staff such as attorneys, accountants, information technology, risk-management and field and maintenance employees. Such shared individuals (i) cannot serve as a "conduit" of either transmission or market information to employees to whom the Standards of Conduct or Affiliate Restrictions prohibit access or disclosure and (ii) cannot engage in transmission or marketing functions.

FERC's Affiliate Restrictions limit the sharing by Florida Power & Light to any affiliate with market-based rate authority of non-public market information related to the energy and power business, unless such information could not lead to any harm to Florida Power & Light's captive retail or wholesale customers. NextEra Energy has adopted an "Affiliate Information Sharing Compliance Protocol," which establishes rules and guidelines both for treatment of "Restricted Communications," and for awareness and

evaluation of other communications that may warrant Restricted Communication status. You are required to understand which communications are potentially Restricted Communications, and apply your independent judgment as to whether advice of the General Counsel or Chief Compliance Officer should be sought.

Additionally, the Affiliate Restrictions specify that sales of non-power goods and services by FPL to market-regulated power sales affiliates and non-utility affiliates of Florida Power & Light must be priced at the higher of cost or market, and sales of non-power goods and services by unregulated affiliates to Florida Power & Light must be priced no higher than market. The Affiliate Restrictions also impose restrictions on the brokering by a marketing affiliate of power generated by Florida Power & Light.

Additional information regarding the FERC Standards of Conduct and Affiliate Restrictions is available on eWeb. Questions about the FERC Standards of Conduct or Affiliate Restrictions should be directed to the Law Department or to the Vice President of Corporate Compliance & Corporate Responsibility Officer. The Corporate Responsibility Officer can be reached as follows:

Vice President, Corporate Compliance  
& Corporate Responsibility Officer  
NextEra Energy, Inc.  
700 Universe Boulevard  
P.O. Box 14000  
Juno Beach, FL 33408-0420  
(561) 694-3688  
[Jeff.Bartel@nexteraenergy.com](mailto:Jeff.Bartel@nexteraenergy.com)

Other FERC rules apply to the Company's operations. For example, some subsidiaries are subject to FERC's anti-manipulation rules, market-behavior rules, open-access transmission rules and various other rules and regulations. Specific questions about FERC's rules should be directed to the appropriate supervisor or manager or the Law Department.

### **North American Electric Reliability Corporation (NERC) Reliability Standards**

Florida Power & Light and NextEra Energy Resources are responsible for complying with the NERC Reliability Standards. Reliability Standards are the planning and operating rules that electric utilities follow to ensure the most reliable system possible. You are responsible for ensuring that you understand and implement the Reliability Standards requirements that apply to your position. Specific questions about NERC's Reliability Standards should be directed to the appropriate supervisor or manager or the reliability organizations of Florida Power & Light and NextEra Energy Resources.

### **Intellectual Property**

You must be sensitive to, and take measures to ensure, the Company's intellectual property – trade secrets, patents, copyrights and trade/service marks – is protected in accordance with federal and state laws. Further you must also respect the intellectual property rights of others, including former employers or competitors. If you work with the Company's intellectual property, please be sure to consult the Law Department about appropriate use and steps you need to take to protect the Company's rights.

### **Antitrust**

The Company is subject to complex laws designed to preserve competition among enterprises and to protect consumers from unfair business arrangements and practices (generally known as "antitrust laws"). You are required to comply with these laws at all times.

The potential for anti-competitive conduct can arise in various situations. These include proposals from competitors to share price or other competitive marketing information or to allocate markets or customers and discussions at industry trade association meetings of competitively sensitive topics, such as prices, pricing policies, costs and marketing strategies. All such situations should be avoided.

If a competitor, customer or a supplier tries to discuss subjects with you that raise concerns about anticompetitive conduct, you should refuse to do so and ask the person to stop immediately. If necessary, you should leave or otherwise terminate the

conversation and report the matter to the Company's General Counsel or another member of the Law Department.

**Bribery, Kickbacks and Foreign Corrupt Practices Act**

Generally, the Foreign Corrupt Practices Act prohibits American companies from making unlawful payments to foreign government officials to either obtain or retain business. Accordingly, you should never offer incentives to a foreign or domestic government official or agent in the hopes of influencing that individual. Moreover, Company funds, services, or labor must not be given, directly or indirectly, to anyone in an improper effort to obtain or retain business for the Company or to obtain any special or unusual treatment in connection with a business transaction. You must discuss in advance any expenditures and transactions of any kind involving foreign government officials, including social meetings, with the appropriate supervisor or manager. Any such expenditure or transaction must be accurately recorded in the Company's books and records. You should always consult with the Law Department before making any payment to foreign government officials, politicians or political parties.

**Commodity Marketing and Trading**

In connection with the Company's commodity marketing and trading activities, we are committed to good-faith and honest dealing and compliance with all applicable international, federal, state and local laws, regulations, tariffs and rules, including those promulgated by FERC and by the Commodity Futures Trading Commission. The laws, regulations and rules that govern our commodity marketing and trading businesses are complex. Accordingly, all employees involved in these activities must become familiar with and comply with the Company's Energy Trading and Risk Management Policy, as well as the Trading and Risk Management Procedures Manual for either Florida Power & Light Company or NextEra Energy Resources Power Marketing, LLC, as applicable.

**Commitment to the Environment**

It has been, and will continue to be, the intent of the Company to conduct its business in an environmentally responsible manner. Accordingly, the Company undertakes to:

- Comply with the spirit and intent, as well as the letter, of environmental laws, regulations and standards.
- Incorporate environmental protection and stewardship as an integral part of the design, construction, operation and maintenance of its facilities.
- Encourage the wise use of energy to minimize the impact on the environment.
- Communicate effectively on environmental issues.
- Conduct periodic self-evaluations and report performance.

The Company has implemented an Environmental Assurance Program to assure compliance with all environmental laws and regulations and the fulfillment of its environmental commitment.

#### **Privacy of Employee Information**

The Company recognizes and protects the privacy and confidentiality of employee medical and personnel records. Such records must not be shared or discussed outside the Company, except as authorized by the affected employee or as required by law, rule, regulation or a subpoena or order issued by a court or requested by a judicial, administrative or legislative body. Requests for such records from anyone outside the Company must be approved by internal Company legal counsel.

## **WORKPLACE RESPONSIBILITIES**

#### **Fair Employment, Diversity and Inclusion**

The Company is committed to providing equal employment opportunity and a work environment that is free of discrimination and harassment. We believe diversity and inclusion are values that reflect our culture of respect for the individual and the importance we place on our differences. Our people are critical to our success. We seek to recruit, develop and retain the most talented people from a diverse candidate pool. Advancement at our Company is based on talent and performance. We are fully

committed to compliance with the letter and spirit of the full range of fair employment and nondiscrimination laws. Beyond meeting our legal obligations to ensure equal employment opportunities, we intend to maintain and nurture an inclusive business environment that values and leverages the diverse talents, perspectives and ideas of all employees. Additional information regarding our employment policies is available on eWeb.

### **Discrimination, Harassment and Intimidation**

The Company prohibits sexual or any other kind of harassment or intimidation, whether committed by or against a supervisor, co-worker, customer, vendor or visitor. Harassment, whether based on a person's race, gender, color, creed, religion, national origin, citizenship, age, disability, marital status, sexual orientation, ancestry, veteran status or socioeconomic status, is repugnant to and inconsistent with our commitment to providing a respectful, professional and dignified workplace.

Employees and supervisors are required to promptly report any harassing conduct or discriminatory practice that they experience, witness, or of which they have knowledge. Employees may report to their supervisor, a Company Human Resources representative, the Company's EEO manager, or the Employee Relations Hotline at 888.552.1055. Employees in California may also contact the Department of Fair Employment and Housing. Within California, contact 800.884.1684. Outside of California, call 916.478.7200.

The Company will promptly investigate all allegations of harassment and discrimination and will take appropriate corrective action. Each allegation will be handled confidentially to the extent reasonably possible. Retaliation is strictly prohibited.

### **Other Employment Matters**

To ensure that our business is conducted properly and efficiently, you must conform to certain standards of work performance and other laws, rules and regulations. You must never engage in unsafe, threatening or violent verbal or physical conduct. Additionally,

supervisors or managers must be notified immediately after any employee is arrested, charged or indicted for the commission of, or participation in, a felony or misdemeanor (including criminal traffic violations) for conduct occurring either off-duty or on-duty. Once notified, the supervisor or manager must contact his or her appropriate HR representative. You can find additional information regarding our Arrest policies on eWeb.

### **Safety**

The Company assigns the highest priority to the safety of its people. No job is so important that it has to be worked in an unsafe manner.

The Company maintains a comprehensive employee safety program for the prevention of accidents. Supervisors and management are responsible for monitoring the use of all reasonable safeguards in the workplace including Company procedures, safe work practices, and personal protective equipment.

Ultimately, however, all employees are responsible for their own safety. Every employee must, for his or her own and fellow workers' health and welfare, abide by the Company procedures and safe work practices, and use all appropriate personal protective equipment. In particular, the Company is committed to maintaining the highest standards of nuclear safety in the design, operation and maintenance of our nuclear power plants. It is each employee's responsibility to bring to the attention of management any concerns relating to the safety of design, operation and maintenance of our nuclear plants.

Alternatively, employees can voice any concerns through the Nuclear Safety Employee Concerns Program by visiting the Employee Concerns Program offices, by calling (800) 645-5105, or by mailing in a concern in postage paid envelopes that are provided in several locations at the Company's Juno Beach offices and at the nuclear plant sites. In addition, anyone is free to bring such matters, at any time, to the attention of the Nuclear Regulatory Commission.

No employee will be discriminated against, in any way, for having brought his or her concerns to the attention of management, the Nuclear Safety Employee Concerns Program, or the Nuclear Regulatory Commission. Neither this Code nor any Company policy or procedure should be construed to prohibit employees from participating in any state or federal administrative, judicial or legislative proceeding or investigation.

### **Drugs and Alcohol**

The Company is firmly committed to providing its employees with a safe workplace to the extent reasonably possible and to promoting high standards of employee health.

The Company expects all employees and contractors to report to work able to perform their duties safely. Substance and alcohol abuse by employees or contractors is regarded as an unsafe work practice by creating an increased risk to their safety and the safety of their fellow workers and the public.

The Company has explicit policies in this regard, which are available on eWeb and which you are required to know. Employees in certain specific safety-sensitive work situations may be subject to more stringent requirements such as, but not limited to, those associated with the Nuclear Fitness for Duty Program, Commercial Driver's License requirements, or the Omnibus Transportation Employee Testing Act of 1991 and applicable federal regulations.

All such policies will be strictly enforced. You may obtain copies of them from a Compliance Officer.

## **REPRESENTING THE COMPANY TO CUSTOMERS & OTHERS**

### **Treatment of Customers**

Our customers are extremely important to us. They are the reason the Company exists and our success depends upon their satisfaction. Customers are always to be treated with the utmost respect and courtesy. They are also to be treated fairly. No customer should be given preferential treatment.

Information that we have regarding our customers is to be kept confidential and used only for Company purposes. Customer satisfaction is the job of every employee.

Those of us who work on or around our customers' property have a special obligation. We should avoid unnecessary damage to a customer's property. If some damage is necessary in order to provide our services, it should be kept to a minimum and the property restored when the work is finished.

### **Honesty with Regulators and Auditors**

In our businesses, we are extensively regulated by a number of commissions, agencies, and other governmental entities. In addition, we are regularly audited by both internal and external auditors. While we may not always agree with these regulators and auditors, it is essential that the information that we supply to them be accurate and not misleading. We must cooperate with all our employees and representatives who interface with our regulators and auditors and supply them in a timely manner with accurate and complete information which they require to fulfill their responsibilities.

### **Communications with the Public**

Before publishing, making speeches, giving interviews or making public appearances that are connected to the Company's business interests, you must get approval from your supervisor.

In addition, in order to ensure the Company's communications with the public are accurate, complete, consistent and in compliance with applicable law, while still protecting the Company's confidentiality and interests, you should always refer all news

media, securities analyst and investor inquiries to Corporate Communications or Investor Relations. You should not provide responses unless specifically requested to do so by an appropriate Company representative.

### **Political Activities and Contributions**

You have the right to participate voluntarily in the political process. No one in the Company may require you to contribute to, support or oppose any political candidate or group. If you choose to participate in the political process, you must do so as an individual, not as a representative of the Company. You may not work on a political fundraiser or other campaign activity while at work or use Company property for these activities. Any overt, visible and partisan political activity that could cause someone to believe that your actions reflect the views or position of the Company requires the prior approval of the General Counsel. Any questions regarding the Company's policies on political activities should be directed to the Vice President, Government Affairs or the Vice President, State Legislative Affairs, of Florida Power & Light Company.

U.S. federal law and the laws of certain states (not including Florida) generally prohibit a corporation from making political contributions. This prohibition includes monetary contributions, "in-kind" contributions (e.g., the use of facilities for a fundraiser, purchase of tickets for receptions or dinners, advertisements in journals or payments for services) and gifts to officials. Generally, our Political Action Committee (FPL PAC), which is funded by personal contributions made by Company employees, is the only permissible source for funding U.S. political contributions on matters important to the Company.

### **Lobbying Activities; Gifts, Travel and Meals to, and Entertainment of, Public Officials**

The Company encourages every employee to take an active interest in government processes. Any such participation, however, is to be undertaken as an individual – not as a representative of the Company.

As a general matter, you should not engage in lobbying activity on behalf of the Company. Any lobbying activity that is undertaken on behalf of the Company requires the prior approval of the Vice President, Government Affairs - Federal; or, specifically in the case of State of Florida matters, the Senior Vice President, Governmental Affairs – State, of Florida Power & Light or, in the case of local governments in Florida, the Vice President, External Affairs of Florida Power & Light, or, in the case of state or local governments other than in Florida, the Vice President, Regulatory Affairs, of NextEra Energy Resources.

Lobbying activity generally includes attempts to influence the passage or defeat of legislation or the outcome of quasi-judicial cases or others decisions being considered by government bodies. The U.S. government, many states (including Florida), and many local governments extend the definition of lobbying activity to cover efforts to influence formal rulemaking by executive branch agencies or other official actions of agencies. Such lobbying activity may trigger lobbying registration and reporting requirements. Employees engaged in lobbying on behalf of the Company must make themselves aware of and abide by all lobbying registration and reporting requirements pertaining to their activity.

In addition, many jurisdictions – including federal, state and some local governments in Florida and elsewhere – have restrictions on government officials accepting gifts, meals, travel and entertainment. In certain jurisdictions, the definition of public officials includes both elected officials as well as non-elected employees of the respective governments and their agencies. As a general matter, you should not engage in providing anything of value on behalf of the Company to public officials. Any provision of gifts, meals or travel to, or entertainment of, government officials that is undertaken by an employee on behalf of the Company requires the prior approval of the Vice President, Government Affairs - Federal; or, specifically in the case of State of Florida matters, the Senior Vice President, Governmental Affairs – State, of Florida Power & Light or, in the case of local governments in Florida, the Vice President, External Affairs

of Florida Power & Light, or, in the case of state or local governments other than in Florida, the Vice President, Regulatory Affairs, of NextEra Energy Resources.

## **WAIVERS**

Any waiver of any provision of this Code for executive officers (as “officer” is defined in Rule 16(a)-1(f) under the Securities Exchange Act of 1934, as amended) or directors must be approved by the Board of Directors, or a designated committee of the Board. Any such waiver must be promptly disclosed to shareholders in accordance with applicable New York Stock Exchange rules. The Company generally will not grant such waivers and will make exceptions only for good cause.

## **COMPLIANCE ASSISTANCE**

The following officers of the Company have been designated as “Compliance Officers” to oversee the implementation and enforcement of this Code and the Company’s other legal compliance programs and to assist you in complying with them. You may contact them by submitting an anonymous report at <https://nextera.alertline.com>.

<u>Name</u>	<u>Title</u>
Charles E. Sieving	Executive Vice President & General Counsel
Alissa E. Ballot	Vice President & Corporate Secretary
Maria V. Fogarty	Vice President, Internal Audit
Jeffrey S. Bartel	Vice President, Corporate Compliance & Corporate Responsibility Officer

In addition, you may contact any member of the Audit Committee of the NextEra Energy Board of Directors by calling 561.694.4644 or writing to: Chairman of the Audit Committee, NextEra Energy, Inc., PO Box 14000, 700 Universe Boulevard, Juno Beach, Florida 33408.

Adopted March 31, 2004; Most recently revised October 16, 2009