

NextDecade is committed to:

- Maintaining the highest standards of ethical and responsible business conduct
- Promoting ethical and honest behavior
- Ensuring all employees feel safe and secure in their work environment
- Fostering an environment where employees feel comfortable in raising concerns

In support of this commitment, NextDecade is pleased to introduce **EthicsPoint**. This service is provided by an independent third party to facilitate anonymous reporting of potential misconduct, or for those who suspect illegal or unethical behavior relating to any of the organization's operations. These could include:

- *Fraud*
- *Theft*
- *Accounting Irregularities, Financial Statement Disclosure Issues*
- *Non-compliance with Internal Accounting Controls*
- *Workplace Violence*
- *Substance Abuse*
- *Discrimination, Harassment*
- *Falsification of Company Records*
- *Conflicts of Interest*
- *Release of Proprietary Information*
- *Safety/Security Violations*
- *Malicious Property Damage*
- *Breaches of other Applicable Laws (environmental, employment, health and safety laws)*
- *Unethical or illegal behavior*

This service is not intended to replace your direct supervisor or the executive team as an avenue of bringing forth concerns. It is intended to provide an unbiased and anonymous outlet for reporting troubling workplace situations when you are not comfortable with the alternatives. Our ethics reporting service ensures that concerns can be raised regarding inappropriate conduct, in good faith without being subjected to retaliation, harassment or discriminatory treatment and having such concerns properly investigated. Each report to the ethics reporting service will be investigated thoroughly and appropriate action taken where necessary. Whistleblower matters are reported to the General Counsel and Vice President of Human Resources of NextDecade, unless those people are implicated; then the company's external counsel will be contacted for information and mediation.

Reporting Resources:

**Internal:**

- Your Manager or Supervisor
- Vera de Gyarfas, General Counsel
- Raquel Couri, SVP, Human Resources and Administration

**External:**

- Whistleblower Hotline: 1-844-759-0032
- Website: [www.next-decade.com.ethicspoint.com](http://www.next-decade.com.ethicspoint.com)
- Phone/Fax: 1-832-403-2198
- Email: [corporatesecretary@next-decade.com](mailto:corporatesecretary@next-decade.com)
- Mail: The Chair, Audit & Risk Committee

NextDecade Corporation  
1000 Louisiana Street, Suite 3900  
Houston, TX 77002

**EthicsPoint Procedures:**

1. Employee identifies potential wrongdoing within the workplace.
2. Employee contacts **EthicsPoint** by phone, fax, website, e-mail and/or mail if they feel they require assistance from outside the company.
3. The contact center agent collects and transcribes the information and assigns the employee for potential confidential follow up. The contact center agent provides the employee with a reference number for follow up.
4. Appropriate NextDecade representatives are notified of this report and a collective decision is made on whether to proceed with further investigation.
5. If more information is required, the NextDecade designate may contact the employee through the Whistleblower system, allowing for an anonymous dialogue between the employer and the whistleblower. If the employee has been given personal information, they may be contacted for further assistance.
6. The claim is reviewed for action.
7. Any outcomes as a result of the claim are made and the claim is closed.