

TXNM ENERGY, INC.

Supplier Code of Conduct (Approved December 5, 2023)

TXNM Energy, Inc. and its subsidiaries (collectively “TXNM Energy”) strive to create a clean and bright energy future guided by our core values.

Safety for ourselves, our co-workers, our customers, and our communities depend on every employee, every day.

Caring about the welfare of others is a company tradition that fosters a positive workplace, a focus on customers, and dedicated customer service.

Integrity and honest communications guide our dealings and keep us accountable to our stakeholders and each other.

TXNM Energy seeks to engage suppliers that conduct their business in compliance with all laws, rules and regulations and share like-minded core values. We recognize and understand that suppliers are independent entities; however, the business practices and actions of a vendor may impact or reflect upon TXNM Energy. To help you understand the expectations for our business relationship with you, this Supplier Code of Conduct (“Code”) has been established to provide guidance on what we expect from you. Further expectations are also provided within the contractual terms and conditions for our business relationship.

As a supplier to TXNM Energy, it is your responsibility to ensure that your workforce, agents, and subcontractors understand and comply with the standards established in this code. They should also understand that non-compliance could alter our business relationship and result in termination of our business relationship.

HEALTH & SAFETY

TXNM Energy is committed to the health, safety and well-being of all our employees, contractors and members of the public. The goods and services you provide must meet the ethical and legal standards described in this Code. This includes knowing and fully complying with all applicable laws, rules and regulations. As an TXNM Energy supplier, you are expected to provide and promote a safe and healthy working environment that supports accident prevention and minimizes risk to all individuals involved in the work you undertake for TXNM Energy. Promoting a safe and healthy working environment must include taking immediate action to address and report unsafe conditions; ensuring contract workers and subcontractors are trained and knowledgeable on safety guidelines and procedures; record retention rules; emergency preparedness and response; and ensuring contract workers and subcontractors are free from the effects of alcohol and marijuana and illegal drugs.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

TXNM Energy is committed to protecting and conserving the environment for the benefit of all our stakeholders. We want our suppliers to have a similar level of environmental and sustainability commitment. We expect you to understand the environmental issues associated with the production of goods and services that you provide and abide by the letter and the spirit of all associated federal, state and local environmental laws, rules and regulations, including proper handling of all potentially hazardous or regulated materials. We also expect you will commit to minimizing your production of hazardous air

emissions through methods such as controls, conservation and the use of non-emitting, clean and renewable energy sources.

ANTI-CORRUPTION AND BRIBERY

You and your affiliated entities are required to conduct business activities in compliance with all applicable laws, rules and regulations. TXNM Energy maintains a zero-tolerance approach to any type of bribery, fraud or corrupt practice. Consequently, as our suppliers, we require you not to engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage or influence. You are required to abide with all applicable anti-corruption laws, rules and regulations. This includes the Foreign Corrupt Practices Act and applicable international anti-corruption conventions and not engaging in activities that would violate, or cause TXNM Energy to violate, applicable international trade and export laws including regulations of the Office of Foreign Assets Control of the United States Department of Treasury.

TXNM Energy expects you to have procedures in place to protect employees, agents and contractors who provide you with information on any unfair or inappropriate business activities. As a TXNM Energy supplier, you may be asked to provide your internal policies and procedures related to the detection and prevention of corrupt practices.

FAIR COMPETITION

TXNM Energy is committed to both the letter and spirit of fair competition and antitrust laws to ensure a free and open market. You are required to comply with all such laws and consult your own legal counsel. In addition, you must comply with our procedures designed to promote integrity and fair competition. Examples of prohibited conduct include (but are not limited to) agreements with a competitor to fix prices or other terms and conditions, to rig bids (such as in response to RFP), to unfairly use confidential information, or to divide or not compete in certain markets. You must conduct your business with integrity, avoiding misrepresentation of your products and services, and those of your competitors.

REGULATORY AND AFFILIATE REQUIREMENTS

Most of TXNM Energy's businesses are subject to state and federal regulatory rules and laws. When working with TXNM Energy and its affiliates, we expect you to understand and comply with the relevant regulatory requirements and rules. Our federal and state regulators have established clear rules that govern how transactions and information sharing can be undertaken between our state regulated utilities and our unregulated TXNM Energy affiliates. It is your responsibility to ask your TXNM Energy contact if you have questions or concerns regarding complying with these requirements.

CONFLICT MINERALS

TXNM Energy supports the purpose of Section 1502 of the Dodd-Frank Act relating to conflict minerals ("Conflict Minerals Rule"). Conflict minerals include gold, tin, tungsten or tantalum originating from the Democratic Republic of the Congo, or an adjoining country, including recycled or scrap materials traceable to the region. We expect that you, as a supplier, have controls and policies in place to ensure that you comply with the Conflict Minerals Rule and do not supply us products containing conflict minerals. If you believe that conflict minerals are contained within products supplied to us, you must investigate and disclose your findings to us regarding the origin of the suspected conflict mineral.

RESPECT FOR HUMAN RIGHTS

TXNM Energy is committed to respecting and protecting human rights. As our supplier, you are expected to comply with all applicable employment laws, rules and regulations, including state, federal and local laws and regulations regarding:

- Equal opportunity and non-discrimination
- Forced or compulsory labor (including slavery, use of prison labor and human trafficking)
- Child labor, including minimum hiring age limits
- Freedom of association and collective bargaining
- Fair remuneration
- Workplace harassment
- Working hours and payment of wages, including minimum wages, overtime and social security benefits
- Health & Safety
- Whistleblower protections

TXNM Energy values business diversity and encourages the development and inclusion of small and disadvantaged enterprises, where practical. TXNM Energy participates in diverse supplier forums and encourages those businesses to register with our company.

Additionally, we also expect you to:

- Refrain from discriminatory practices and protect the rights of ethnic minorities and indigenous peoples in the countries where you do business.
- Demonstrate courtesy, honesty, and respect for others in your dealings with TXNM Energy employees, agents and other contractors. TXNM Energy will not tolerate behavior that might discriminate, intimidate, harass, disrupt or interfere with anyone performing work on our behalf.

USE OF TXNM ENERGY'S ASSETS

You must use TXNM Energy assets for the purpose for which they were provided, complying at the same time with all contractual terms and environmental, health and safety laws and regulations. You may not use, reproduce, access, modify, download, distribute, copy or retain any works, trademarks, patents or other intellectual property belonging to or created for TXNM Energy. You must comply with all information protection, data security and privacy laws in connection with your work for TXNM Energy. You may not use information or data obtained in connection with your work for TXNM Energy to trade the securities of TXNM Energy or our affiliates.

CONFLICTS OF INTEREST

As a TXNM Energy supplier, you must avoid actual or potential conflicts of interest with TXNM Energy and its affiliates. Generally speaking, a conflict of interest is a situation where your personal interests, as a supplier, could directly or indirectly conflict with the best interests of TXNM Energy or its affiliates.

This includes having:

- a significant financial interest in another company in our industry, such as a competitor
- a family member or other close personal relative working for TXNM Energy or its affiliates
- having access to TXNM Energy's proprietary information while contracting with competitors

Should an actual or potential conflict of interest arise, you are expected to immediately disclose it to your TXNM Energy contact.

GIFTS AND HOSPITALITY

As a supplier, you should not offer or give gifts or hospitality to TXNM Energy employees or their families that would violate our Code of Business Conduct and Ethics. TXNM Energy generally permits limited non-cash gifts and hospitality that will not create an appearance of obligation or favoritism. For example, suppliers should avoid offering gifts or hospitality while bidding on work which could create an appearance of obligation or favoritism. Common business courtesies such as occasional business meals and tickets to sporting events are acceptable so long as the value is nominal and there is no intent to improperly influence a business decision or create a potential conflict of interest. Suppliers must not give or offer gift cards or cash to our employees or their family members.

You may contact our Ethics and Compliance Program staff for guidance.

REPORTING CONCERNS

Situations will arise where you need clarification or more information to make the right decision. You are responsible for recognizing these situations and acting accordingly, including informing TXNM Energy.

TXNM Energy has a strict non-retaliation policy for individuals who report concerns in good faith. Punishment, penalties and all other forms of retaliatory action against individuals for reporting an ethical or compliance concern in good faith are strictly prohibited.

There are several methods for you to raise concerns, questions or non-compliance matters, including speaking directly with your TXNM Energy contact.

TXNM Energy also maintains an Ethics and Compliance helpline (operated by an independent third-party) where you have the option to report concerns anonymously.

- <https://secure.ethicspoint.com/domain/media/en/gui/12868/index.html>

You may also contact the Ethics and Compliance staff directly.

- ethics@txmenergy.com