SHINE™

Our Code of Conduct

Welcome!

We're not here to follow the status quo. We're here to break it. Whether we're making the world safe with neutron testing, giving cancer patients a fighting chance, or tackling nuclear waste to make it renewable, we take on challenges that others wouldn't dare touch.

Our mission is to develop fusion technologies to eliminate energy as a constraint on human potential and make the world cleaner, safer, and better.

That's a big deal – and now you're part of it!

Our guide to doing the right thing

This is our code of conduct. It is how we expect everyone at SHINE to behave. It's not a rulebook—it's a set of principles that should guide your decisions so that you are advancing our mission in a manner consistent with our Core Values. How we achieve our aim is just as important as attaining it.

First and foremost, we expect everyone to conduct their affairs lawfully and with integrity – to have the courage to **do the right thing**, even when no one is looking. This is our most basic expectation. It's the ante to play in our world.

Our core values: The foundation

We are a principles-driven company. Rules have their place – indeed, we have prescribed policies, processes, and procedures – but we must always ensure that any rule supports and promotes our general principles or Core Values.

In most human endeavors, there are no perfect solutions – only tradeoffs. Our Core Values help us navigate these tradeoffs with integrity and purpose. They provide the foundation for thoughtful decision-making, ensuring we align our actions with our mission and remain adaptable in a complex and ever-changing world.

You'll learn more about this from your manager and through your experiences here. For now, realize that our Core Values form the foundation for everything that follows.

Safety: our way of life

Safety isn't a priority (priorities can change). It's our way of life. Don't ever let unsafe work practices, equipment, or behaviors slide. You not only have the right to stop work if you see anything concerning, you have the responsibility to do so. Here are a few examples of what that means in practice:

- **Notice something? Speak up.** If it feels wrong, it probably is – your voice can make all the difference.
- **See someone at risk? Step in.** Don't worry about hurting someone's feelings or respecting authority. Call it out on the spot. Safety is a team sport.
- **Not sure about a procedure? Ask!** There is no shame in double-checking – it's how we stay sharp and safe.
- **Equipment not working correctly? Put it in a safe state and report it.** Don't power through; address it before it becomes a problem.
- **Did you witness or experience a "near miss"? Report it.** This allows us all to learn from one another and to make work environments and the people in them safer.
- **Need more training? Say so.** We've got your back – just let us know what you need.

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Treat others with dignity and respect

RESPECT FUELS INNOVATION

Great ideas are the raw materials of innovation. They can come from anywhere – and everyone. Ideas don't care about rank, tenure, race, religion, or any other arbitrary box that people sometimes seem intent on putting others in. We are all unique individuals worthy of dignity and respect; everyone can contribute.

Respect means listening to understand, with curiosity and intellectual honesty—not ego. It also means challenging the idea, not the person. Here are some examples of showing respect at SHINE:

- **Speak up.** Your "wild idea" might spark other ideas, leading to the next breakthrough.
- **No wallflowers.** If you are in the meeting, contribute to the effort. Be present. If you notice someone is not talking, find a way to involve them – ask them what they think.
- **Be okay with a healthy tension**. Conflict is to be expected: Ideas and challenges create sparks that can lead to innovative insights. Debating ideas, not people, keeps the conflict productive.

Great ideas are the raw materials of innovation.

UNPRODUCTIVE CONFLICT: TURN FRICTION INTO PROGRESS

As we stated above, conflict is to be expected when differing perspectives and opinions are involved. It's often a necessary condition for generating insights that lead to innovations. It can also be a sign that we're pushing boundaries and creating something extraordinary.

Sometimes, friction can create more heat than light—in other words, unproductive conflict. When this happens:

- In most cases, the issue can be solved directly between the individuals involved. Don't shy away from the issue: be open and respectful with each other and stay focused on solutions.
- If you struggle to repair the rift and it affects your ability to accomplish work, loop in your manager(s). Be open with each other about it – there's nothing wrong with asking managers for help. That is a large part of why they're there!

MISCONDUCT AND OUR COMMITMENT TO NON-RETALIATION

We wouldn't need a code of conduct if everyone were an angel. Sometimes, behaviors go beyond unproductive friction and are considered inappropriate misconduct. For example, this would be the case if you are threatened or made to feel unsafe. It could also be because you are made to feel excluded or marginalized in a way that discourages you from speaking up to offer your ideas or challenges. In such cases, it is vital to seek assistance immediately:

- **Call in the experts:** For sensitive issues or misconduct, contact HR, Legal, the Compliance team, and anyone on the senior management team you trust. They will take you seriously and have the knowledge and authority to take the appropriate next steps.
- **Use the hotline.** Need to go outside the chain? Call our anonymous hotline at **1-833-SHINE-11 (1-833-744-6311).**

We want you to feel secure when raising concerns or calling out misconduct. We strictly prohibit retaliation against anyone who reports a concern in good faith. This means you cannot be punished for raising a concern, that your concerns will be taking seriously, that any next steps we take will be thorough and fair, and that your confidentiality will be protected to the extent possible.

RESPECT AND PROTECT OUR MAGIC

Our technology, innovations, trade secrets, and other intellectual property are valuable assets. Sharing them casually or carelessly could harm everything we've built. Understand our policies and procedures for protecting these assets and use good judgment. Here are some basics:

- Keep your work area clear of sensitive information when you are not there. (This includes locking your screens.)
- Keep sensitive documents locked down – physical and digital.
- Be careful where and with whom you talk about work (for example, phone calls on airplanes before taxiing, meetings in public spaces like coffee shops, etc.)
- Keep your social media posts professional.
- Ensure that appropriate confidentiality agreements are in place with third parties before sharing confidential information.

Feedback: give it, get it, grow from it

No matter how capable and accomplished we are, we can all improve. Everything can be improved. Knowing how and in what ways requires **feedback**—from the environment (like the outputs of technical experiments or prices from markets) and others (like customers, colleagues, and investors). Feedback keeps us grounded in reality, which is necessary to remain healthy and relevant. Feedback is how we stay on course to accomplish our mission.

Feedback is not the same as criticism—it's about improving ourselves, each other, and SHINE.

- **Ask for it.** Do not just accept feedback; demand it. Seek it out and embrace it. All feedback is a gift.
- **Give it in the spirit of helping.** Don't be tentative or apologetic about it. Giving feedback is a sign of respect.
- **The best feedback is clear, specific, brief, and to the point.**
- **It can also be positive.** Being specific about a behavior and pointing out the impact of an outcome rather than just saying, "Nice work," can aid learning, too.

Feedback is about improving ourselves, each other, and SHINE.

Knowledge seeking and sharing: networks not hierarchies

At SHINE we believe in the power of networks to accelerate learning, innovation, and problem-solving. Knowledge is not the property of any one person, team, or department – it is a shared resource that drives our collective success. This means you should feel empowered to actively seek out the information you need, wherever it resides. Talk to whomever can provide insights or guidance, whether it's a peer, someone in another division, or even your supervisor's manager. You don't need permission to access the knowledge necessary to do your job, improve a process, or create something new.

This doesn't excuse us from exercising good judgement. Be respectful of others' time and priorities when seeking their input and come prepared to make your interactions efficient and purposeful. (Do your homework.) Similarly, if someone seeks your expertise, share openly and generously. By doing so you're helping to build a culture of rapid knowledge transfer and collaboration, breaking down the barriers that hierarchies often create.

This fosters agility, innovation and a shared sense of purpose. We trust you to balance this freedom and accountability, ensuring we remain a high-performing and cohesive organization.

Conflicts of interest: transparency builds trust

A conflict of interest occurs when an individual's interests or relationships might interfere with doing what's best for SHINE. At work, conflicts of interest can arise in many ways:

- A relative works at a vendor you want to hire.
- A customer sends you a fancy gift or tickets to a concert or sporting event.
- You're thinking about consulting for another company on the side.

When things like this happen, it doesn't mean you've done something wrong. The key is to be transparent about it before it happens. We thrive on trust, and that starts with openness. Disclose the situation to your manager, HR, Legal, or the Compliance Officer.

Decision-making: keep it simple

When you are making a decision or faced with a choice, ask yourself:

- Is it safe?
- Is it legal?
- Is it consistent with our Core Values?
- Does it align with our mission? Does it move us forward?
- Would I want to see my decision on a billboard? Would I want to justify it to my family?

If the answer to any of these is "no" or "I'm not sure," pause. Ask for guidance. Clarity beats speed every time.

Supporting your success

We hold ourselves and each other accountable for our conduct, but we also know that doing the right thing isn't always easy. You're not alone – we have your back in the form of:

- Open-door policies with leadership, HR, and legal for any questions or concerns.
- Protection from retaliation if you raise an issue in good faith.
- Ongoing training and compliance resources to keep you informed.

Have fun! Energy powers everything

Fusion isn't just at the core of our mission; it's at the core of how we work. Creativity and innovation thrive in environments where people feel energized, connected, and joyful. At SHINE, having fun isn't a distraction from serious work; it's fuel for it.

Bring energy every day by:

- **Celebrating wins**. Big or small, find ways to acknowledge victories. Success deserves recognition.
- **Catch people doing things right;** thank someone who takes the time to give you feedback.
- **Connect with your team.** Take moments to build relationships. A strong team dynamic makes even the hardest challenges enjoyable.
- **Find your spark.** Whether it's a laugh in a meeting or a break to recharge, find ways to stay motivated and engaged.
- **Inject positivity.** Humor and optimism aren't just nice to have, they're essential. A good laugh can ignite a good idea.
- **Bring your "A" game.** And expect it from others. Challenge yourself and those around you to aspire to high standards. Endeavor to contribute to making the world a better place and strive to bring purpose and meaning to your work.

A living code

Our company doesn't stand still, and neither does this guide. As our company grows, so will this document. Do you have suggestions for how to improve it? Speak up! We want this document to reflect who we are and where we're going.

Treat this guide as your compass. It's how we work, innovate, and grow together. We want every decision and action you take to fuel our mission of revolutionizing entire industries and improving lives.