Bright Horizon Energy

CODE OF ETHICS FOR THE CHIEF EXECUTIVE OFFICER AND SENIOR FINANCIAL OFFICERS

Approved by the Board of Directors: 11-14-2026

The Board of Directors (the “Board”) of Bright Horizon Energy (the “Company”) has adopted this Code of Ethics for the Chief Executive Officer and Senior Financial Officers (this “Code”). This Code applies to the Chief Executive Officer, Chief Financial Officer, principal accounting officer or controller, and any other persons performing similar functions (collectively the “Covered Officers”). This Code supplements the Company’s Code of Conduct and Ethics and related Company policies and procedures and is designed to deter wrongdoing and promote honest and ethical conduct.

Honest and Ethical Conduct
Each Covered Officer shall at all times act honestly, ethically, and in good faith, with due care, competence, diligence, and objectivity in the performance of his or her duties. Covered Officers shall not engage in any illegal, fraudulent, misleading, manipulative, or unethical conduct, nor knowingly permit others acting under their supervision to do so.

Conflicts of Interest
Each Covered Officer shall avoid any actual, potential, or apparent conflict of interest between personal and professional relationships. A conflict of interest may arise whenever a Covered Officer’s personal interests interfere, or appear to interfere, with the interests of the Company. Conflicts of interest may involve not only situations in which the Covered Officer has a direct personal interest, but also those in which a family member of the Covered Officer has an interest or those in which the interest is indirect through a corporation, partnership or other entity.

Without limitation, each Covered Officer shall avoid any actual or apparent conflict of interest between his or her personal and professional relationships and any material transaction or relationship that reasonably could be expected to give rise to such a conflict and shall immediately report any such relationships or transactions to the Chief Legal Officer or Chair of the Audit Committee.

Full and Fair Disclosure
Each Covered Officer is responsible for the full, fair, accurate, timely and understandable disclosures in SEC filings, earnings materials, investor presentations, financing materials, and other public communications. Covered Officers are prohibited from knowingly misrepresenting, omitting, concealing, falsifying, or causing others to misrepresent, omit, conceal, or falsify material facts or records. Covered Officers must not, directly or indirectly, mislead, coerce, manipulate, or fraudulently influence the independent auditor, internal audit, or any regulator in connection with the performance of their duties.

It is the responsibility of each Covered Officer to coordinate and consult with the Company's Disclosure Committee to ensure its members are aware of and carry out their duties and responsibilities in accordance with all relevant disclosure obligations of the Company.

Compliance with Laws, Rules, and Regulations
Each Covered Officer shall comply with applicable laws, rules, and regulations.

Reporting Concerns
Each Covered Officer shall promptly report any actual or perceived violation of the law, this Code, or the Company's Code of Conduct and Ethics to the Chief Legal Officer.

Accountability
Any Covered Officer who is found to have violated any provision of the Code shall be subject to disciplinary action, up to and including termination. Violations of this Code of Ethics may also constitute violations of law that may result in civil and criminal penalties.

Waivers and Amendments
Any waiver of this Code for a Covered Officer or a director may be made only by the Board or a committee of the Board to which such authority has been delegated. The Company shall promptly disclose any amendment to, or waiver (including any implicit waiver) from, a provision of this Code to the extent required by applicable law and regulations of the U.S. Securities and Exchange Commission.

Acknowledgment

I acknowledge that I have received, read, and understand the Code of Ethics for the Chief Executive Officer and Senior Financial Officers. I agree to comply with this Code and the Company's related policies and procedures. I understand my obligation to promptly report suspected violations and actual or potential conflicts of interest as required by this Code.

_____

Printed Name

_____

Title

_____

Signature

_____

Date