



Human Resources Policy

<u>Number:</u>	<u>Subject:</u>	<u>Applicability:</u>	<u>Revision Date:</u>	<u>Pages:</u>
1-04	<i>Sexual and Other Unlawful Harassment/Anti-discrimination Policy</i>	<i>All Employees*</i>	<i>May 2, 2022</i>	7

AVANGRID is committed to maintaining a workplace that is free of unlawful harassment, discrimination and retaliation.

As a result, the Company maintains a strict policy prohibiting sexual harassment, discrimination, and harassment against applicants, interns, employees or any other covered persons based on any legally-recognized status, including but not limited to: race, color, religion, national origin, age, ancestry, genetic information, physical or mental disability, marital status, sex, gender, gender identity, gender expression, sexual orientation, pregnancy, military or veteran status, or any other status protected by federal, state or local law.

For purposes of this Policy “race” includes physical characteristics that are historically associated with race, including but not limited to natural hair, hair texture, hair type, length, protective hairstyles, and cultural or religious headdresses. “Protective hairstyles” include any hairstyle, hair color or manner of wearing hair that includes, but is not limited to, braids, regardless of whether the braids are created with extensions or styled with adornments, locs and twists.

Applicability

This Policy applies to all persons involved in the Company’s operations, regardless of their position, and prohibits harassing, discriminatory or retaliatory conduct by any AVANGRID employee including co-workers, supervisors, managers and nonsupervisory employees. This Policy also protects employees and any other covered persons from prohibited harassment by third parties, such as customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone other than an AVANGRID employee, the procedures in this Policy should be followed. This Policy applies to the workplace, which includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), company-sponsored events, or company owned/controlled property. For purposes of this Policy, the term employee includes interns.



Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of substantially or unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the types of conduct prohibited by this Policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages;
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress, whistling or making suggestive or insulting sounds;
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;
- Physical conduct: touching, assault or impeding or blocking normal movements; and/or,
- Retaliation for making reports or threatening to report sexual harassment.

Other Types of Unlawful Harassment

Harassment on the basis of any legally protected status is prohibited, including harassment based on: race, color, religion, national origin, age, ancestry, genetic information, physical or mental disability, marital status, sex, gender, gender identity, gender expression, sexual orientation, pregnancy, military or veteran status, or any other status protected by federal, state or local law.

Harassment has the purpose or effect of unreasonably interfering with an individual's work performance, creating a hostile or offensive work environment, or otherwise adversely affecting an individual's terms or conditions of employment.

Unlawful harassment may include behavior similar to the illustrations above pertaining to sexual harassment. Harassment may also include, but is not limited to, offensive jokes,



epithets, slurs, name calling, physical assaults or threats, stereotyping, intimidating or offensive conduct, ridicule or mockery, insults or put-downs, displaying or distributing offensive materials, interference with work performance or making offensive jokes and comments based on the above mentioned protected categories, including but not limited to displaying, housing, storing, retaining, transmitting or distributing offensive material by means of Company property such as computer, cell phone, smart phone, or other electronic device.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by AVANGRID for using this complaint procedure, reporting proscribed harassment or discrimination, objecting to such conduct or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency.

Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Reporting Complaints

Any applicant or employee who believes they have been subject to unlawful harassment, discrimination or retaliation or who believes another individual has been subject to such conduct, should report it immediately in order for the Company to investigate and take appropriate action.

Individuals are encouraged, but not required, to communicate to the offending person that the person's conduct is offensive and unwelcome.

Complaints can be made to a supervisor, the HR Hub via email at onehrhub@avangrid.com or by phone at 833-246-6347, or online at AVANGRID's [EthicsPoint](#) or by phone at 877-606-9171. Complaints submitted through EthicsPoint may also be made anonymously. Supervisors must immediately report any complaints of harassment, discrimination or retaliation that they receive to the HR Hub prior to attempting resolution. Although not mandatory, if you wish to use a Complaint Form please visit the HR Hub.

After a report is received, a fair, timely and thorough investigation will be undertaken. Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will provide all parties appropriate due process and reach reasonable conclusions based on the evidence collected. The investigation will be completed and a determination made as soon as practical. The Company expects all employees to fully cooperate with any investigation conducted by the Company into a



complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other Company policies, and during the investigation, to keep matters related to the investigation confidential.

If a complaint of prohibited harassment, discrimination or retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the Company may still take action that it deems appropriate to reinforce its commitment to maintaining a work environment free from harassment, discrimination and retaliation.

Prohibited harassment, discrimination and retaliation are not only prohibited by the Company, but are also prohibited by state, federal, and, where applicable, local law. The Company encourages employees to report incidents of prohibited harassment, discrimination or retaliation internally. However, employees who believe they have been subjected to prohibited harassment, discrimination or retaliation in the workplace also may seek relief by filing a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC") for violation of federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964 or by filing a complaint with the equivalent state agency, both of which will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies can be found online at www.eeoc.gov and a list of EEOC offices can be found in Appendix A to this Policy on the HR Hub Portal.

Supervisory Responsibility

All supervisors and managers are responsible for:

- Promptly reporting any complaints, information or observations about suspected sexual harassment or other unlawful harassment, discrimination or retaliation to the HR Hub so it may be investigated and resolved in timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this Policy; and
- Conducting themselves, at all times, in a manner consistent with this Policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination. Supervisors and managers who knowingly allow sexual harassment to continue will be subject to disciplinary action.

Pay Transparency Nondiscrimination

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have



access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the Company's legal duty to furnish information.

Employees in the state of Oregon only

Pursuant to Oregon's Workplace Fairness Act, the Company will not require an employee to enter into any agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault (as defined under ORS 659A.370).

An employee in Oregon claiming to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a nondisclosure, non-disparagement, or no-rehire provision and will have at least seven days to revoke any such agreement.

Under this Policy, a non-disclosure agreement is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault.

Under this Policy, a non-disparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company.

Under this Policy, a no-rehire provision is an agreement that prohibits an employee from seeking reemployment with the company and allows a company to not rehire that individual in the future.

Nothing in this Policy precludes any person from filing a formal grievance in accordance with the Bureau of Labor and Industries' Civil Rights Division or the EEOC. Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence no later than five years after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.

**Please note: Contractors doing business with the Company via a staffing agency and/or vendor agreement are also generally expected to comply with the principles of this Policy unless the policies/terms of their employing agency or vendor agreement specifically dictate otherwise.*

All policies, procedures and/or guidelines described herein may be modified or discontinued at any time, for any reason at the Company's full and sole discretion. No policy, procedure and/or guideline should be construed as a contract or term or condition of employment between an employee and the Company.



Appendix A

This appendix lists some of the equal employment opportunity agencies in the primary states in which Avangrid conducts business that investigate and adjudicate harassment complaints. Other states may have their own state agencies.

California Department of Fair Employment and Housing

Phone: (800) 884-1684

(800) 700-2320 (TTY)

Email: contact.center@dfeh.ca.gov

www.dfeh.ca.gov

Connecticut Commission on Human Rights and Opportunities

450 Columbus Blvd Suite 2, Hartford CT 06103

Phone: (860) 541-3400

Phone: 1(800)477-5737

(860) 541-3459 (TTY)

www.ct.gov/chro/site/default.asp

Maine Human Rights Commission

51 State House Station, Augusta, Maine 04333-0051

Phone: (207) 624-6290

Fax (207) 624-8729

Maine Relay 711 (TTY)

www.maine.gov/mhrc

Massachusetts Commission Against Discrimination

1 Ashburton Place, Suite 601, Boston, MA 02108

Phone: (617) 994-6000

(617) 994-6196 (TTY)

Fax: (617) 994-6024

Email: mcad@mass.gov

www.mass.gov/orgs/massachusetts-commission-against-discrimination

New York State Division of Human Rights

One Fordham Plaza, Fourth Floor, Bronx, New York 10458

Phone: (888) 392-3644

Phone: (718) 741-8400

www.dhr.ny.gov/complaint



Oregon Bureau of Labor and Industries, Civil Rights Division

800 NE Oregon Street, Suite 1045, Portland, Oregon 97232

Phone: (971) 673-0764

Fax: (971) 673-0765

Email: crdemail@boli.state.or.us

www.oregon.gov/boli

Vermont Human Rights Commission

14-16 Baldwin Street, Montpelier, VT 05633-6301

Phone: (802) 828-2480

Phone: (800) 416-2010

Fax: (802) 828-2481

Email: human.rights@vermont.gov

www.hrc.vermont.gov