Corporate Security Policy

October 15, 2019

The Board of Directors of Avangrid, Inc. ("AVANGRID") oversees the management of AVANGRID and its business with a view to enhance the long-term value of AVANGRID for its shareholders. The Board of Directors of AVANGRID (the "Board of Directors") has adopted this Corporate Security Policy (this "Policy") to assist in exercising its responsibilities to AVANGRID and its shareholders. This Policy is subject to periodic review and modification by the Board of Directors from time to time. This Policy and the AVANGRID's certificate of incorporation, by-laws, corporate governance guidelines and other policies pertaining to corporate governance and regulatory compliance, risk, sustainable development, and social responsibility (collectively, the "Corporate Governance System") form the framework of governance of AVANGRID and its subsidiaries (collectively, the "AVANGRID Group"). AVANGRID's Corporate Governance System is inspired by and based on a commitment to ethical principles, transparency and leadership in the application of best practices in good governance and is designed to be a working structure for principled actions, effective decision-making and appropriate monitoring of both compliance and performance.

1. Purpose

This Policy seeks to protect AVANGRID Group people, assets, and information while at the same time ensuring that security-related actions fully conform to applicable laws and regulations and respect human rights. This Policy contributes to the achievement of goal sixteen (Peace, Justice and Strong Institutions) of the Sustainable Development Goals (SDGs) adopted by the member states of the United Nations.

2. Principles

To achieve these goals, the AVANGRID Group shall:

- a) Comply with all applicable laws and regulations regarding physical, cyber, and information security and AVANGRID's Corporate Governance System;
- b) Ensure security personnel are qualified and properly trained in the relevant areas, including, without limitation, privacy, human rights, and the AVANGRID Corporate Governance System;
- c) Develop a preventive strategy and implement security programs that seek to protect critical infrastructure and maintain essential services provided by the AVANGRID Group and minimize security risks, including, without limitation, operational-, reputational-, financial-, privacy-, and compliance-related risks;
- d) Actively engage internal and external stakeholders to mitigate identified security risks;
- e) Optimize resources by prioritizing critical security services while complying with all legal and/or regulatory mandates;
- f) Implement best practices in "threat and incident detection" and "response readiness" to mitigate risk;
- g) Drive innovation and deployment of technology-related solutions in security and compliance to achieve a best-in-class security programs; and
- h) Contribute to the promotion of a culture of security throughout the AVANGRID Group through effective communication and training programs.



