

Social Media Policy

October 18, 2023

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. Avangrid is a member of the group of companies controlled by Iberdrola, S.A. The Board of Directors of Avangrid (the “Board of Directors”) has adopted this Social Media 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 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 “Governance and Sustainability System”) form the framework of governance of Avangrid and its subsidiaries (collectively, the “Avangrid Group”). Avangrid’s Governance and Sustainability 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

Social media is constantly changing the way we interact. The Board of Directors recognizes that social media is a powerful communication and information sharing tool and the benefits of sound social media engagement for the Avangrid Group, its employees, and other stakeholders. However, the Board of Directors is mindful that online interactions through the use of social media may create compliance, cybersecurity, legal, reputational and business risks. This Policy sets forth guidance on the use of social media by the Avangrid Group, addresses social media related risks, and assists directors, officers and employees on a responsible use of social media. This Policy contributes to the achievement of goal sixteen (Peace, Justice and Strong Institutions) of the Sustainable Development Goals approved by the member states of the United Nations.

Social media can take many forms. For the purpose of this Policy, social media means any digital technology or practice that enables people to use, create and share content, opinions and insights in conversations over the internet. This includes known online social media and social networking platforms such as Facebook, LinkedIn, Twitter, Instagram, Tik Tok, Snapchat, Reddit, Pinterest, Tumblr, Flickr, YouTube, as well as blogs, online chatrooms, forums, wikis and comments included on websites.

This Policy is not intended to preclude or dissuade employees from engaging in activities protected by state or federal law, including, without limitation activities under Section 7 of the National Labor Relations Act, such as discussing wages, benefits, or other terms and conditions of employment, forming, joining, or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their own and their fellow employees' mutual aid or protection, or legally required activities.

2. Scope of Application; Other Policies and Rules

This Policy applies to all the companies of the Avangrid Group and their directors, officers, and employees unless an applicable collective bargaining agreement excludes such employees.

This Policy applies both to the use of social media for business purposes by the Avangrid Group and to certain personal uses of social media by directors, officers, and employees of the Avangrid Group. In particular, this Policy addresses personal use of social media in the workplace or through electronic resources and communication systems provided by the Avangrid Group. It should also be considered by directors, officers and employees when their social media activities relate to the Avangrid Group, its business, or stakeholders.

Certain uses of social media, disclosure of information through social media and the use of electronic resources and communications systems provided by the Avangrid Group may be subject to other Avangrid policies and rules, including, without limitation:

- (i) Fair Disclosure Policy,
- (ii) Insider Trading Policy,
- (iii) Personal Data Privacy Policy,
- (iv) Policy on the Responsible Use of Artificial Intelligence Tools and Algorithms,
- (v) Acceptable Use Rule, and
- (vi) Corporate Governance Guidelines

Directors, officers, and employees must also adhere to these and all other applicable policies, rules, and procedures when using social media and must always consider Avangrid's Code of Business Conduct and Ethics. Social media shall not be used in a way that violates Avangrid's Code of Business Conduct and Ethics, Avangrid policies, rules and procedures, or other employee obligations.

3. Use of Social Media by Avangrid

The Avangrid Group may participate in social media only through authorized corporate channels. Avangrid's Corporate Communications Division shall be responsible for authorizing the creation of all social media accounts and shall coordinate all social media activities.

Social media activities of the Avangrid Group shall focus on creating greater brand awareness, reaching and influencing communities with affinity to Avangrid's corporate brand, recruiting, and community relations. As set forth in Avangrid's Fair Disclosure Policy, Avangrid will not use social media to disclose material nonpublic information.

Only the head of Avangrid's Corporate Communications Division, the head of Avangrid's Investor and Shareholder Relations Division, or employees specifically authorized by such officers or authorized under the Fair Disclosure Policy may speak on behalf of the Avangrid Group on these channels.

Social media accounts used by the Avangrid Group and all related social media content shall belong solely to the Avangrid Group, regardless of the employee that creates or uses such social media account on behalf of the Avangrid Group.

4. Personal Use of Social Media

Electronic resources and communication systems, such as computers, internet, networks, mobile phones, smartphones, and e-mail that the Avangrid Group provides to its employees are to support business purposes. Limited use of these resources and communications systems for personal social media purposes during nonworking time is permitted; provided, that the social media use (i) is not related to a private business or other commercial purpose, (ii) does not interfere with the normal performance of employees' duties, (iii) does not violate applicable laws and regulations, and (iv) complies with this Policy. The Avangrid Group will determine which social media platforms or other websites can be accessible through the Avangrid Group electronic resources and communications systems and may, in its sole discretion, block or restrict access based on IT, security, or other business considerations.

All contents of such electronic resources and communications systems are the property of the Avangrid Group. Therefore, employees should not assume the privacy of any information or communications transmitted to, received or printed from, or stored or recorded on electronic resources and communications systems provided by the Avangrid Group. The Avangrid Group may use monitoring controls to ensure compliance with this Policy and other Avangrid policies, rules, or procedures.

Directors, officers, and employees are responsible for their own personal use of social media, including the content of their posts, their choice of social media platform and audience, and any potential liability of such use. They should make sure that their personal statements or posts are not attributed to the Avangrid Group.

When directors, officers and employees disclose their affiliation to the Avangrid Group or when discussing subject matters related to the energy sector or that are in any other way related to the Avangrid Group or its stakeholders, they should make clear that their statements and posts reflect their own personal view and not those of the Avangrid Group. For instance, when appropriate, directors, officers and employees should consider including a disclaimer of the sort of "*the views in this posting reflect my personal views and do not represent the views of my employer.*"

5. Confidential and Nonpublic Information

When using social media, the Avangrid Group and its directors, officers and employees, shall:

- a) Respect trade secrets, other proprietary information and confidential information. Trade secrets and proprietary information of the Avangrid Group, such as information that relates to business development, the operation or functionality of generation plants, factories, networks, or grids of the Avangrid Group, financial information, know how, technology or potential projects are confidential and should be treated accordingly. Special care shall be taken not to inadvertently disclose them through the use of social media.
- b) Not disclose "nonpublic information," as such term is defined in Avangrid's Fair Disclosure Policy. As a public company, Avangrid is subject to strict securities and information disclosure laws and regulations. Violations of these laws and regulations may lead to serious legal consequences. Because determining what constitutes nonpublic information can require specialized judgment, discussions of the following subject matters should be avoided unless an employee has previously consulted with the office of Avangrid's Corporate Secretary or is specifically authorized to do so under Avangrid's Fair Disclosure Policy:
 - i) quarterly or annual earnings or operational results;
 - ii) guidance on earnings estimates;
 - iii) mergers, acquisitions, tender offers, joint ventures, divestitures, material changes in assets or other corporate transactions;
 - iv) senior management changes or changes in control of Avangrid;
 - v) information about dividend payments;
 - vi) significant events concerning Avangrid's physical assets;
 - vii) new projects, contracts with suppliers, or developments regarding customers or suppliers (e.g., the acquisition or loss of a contract);
 - viii) events regarding Avangrid's securities (e.g., defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits or changes in dividends, changes to the rights of securityholders, public or private sales of additional securities or information related to any additional funding);
 - ix) changes in auditors or auditor notification that the issuer may no longer rely on an audit report;
 - x) bankruptcies or receiverships;
 - xi) regulatory investigations or litigation-related developments involving Avangrid;
 - xii) regulatory approvals or changes in regulations and any analysis of how they affect Avangrid;
 - xiii) physical and cybersecurity risks and incidents including vulnerabilities and breaches; and
 - xiv) deterioration or improvement in Avangrid's credit status with rating agencies.

6. Other Rules for Use of Social Media

In addition to the rules set forth in Section 3 (Use of Social Media by Avangrid), Section 4 (Personal Use of Social Media) and Section 5 (Confidential and Nonpublic Information), the Avangrid Group and its directors, officers and employees shall follow these guidelines in any use of social media that is under the scope of this Policy:

- a) Use good judgment, interact honestly with others, and act professionally and with integrity. Endeavor to be accurate and not post information that they know is false.
- b) Clearly disclose their affiliation with the Avangrid Group when making references to the Avangrid Group.
- c) Comply with laws regarding copyrights, trademarks and other intellectual or third-party rights. Special care shall be taken to avoid infringing third party intellectual property rights. When appropriate, the sources of the information or of any material posted should be accurately cited.
- d) Be respectful to others. Do not make statements, post any material or express a viewpoint on another's post that could be considered offensive, malicious, harassing, bullying or threatening, including ethnic slurs, sexist comments, discriminatory comments, abusive language, or obscenity.
- e) Comply with privacy laws and respect privacy rights.
- f) Review and comply with the terms of use of all social media platforms and other visited internet sites.

7. Enforcement

Violations of this Policy by directors, officers or employees of the Avangrid Group may result in appropriate disciplinary action, up to and including termination.

8. Further Information

Any questions about this Policy should be directed to the Avangrid Corporate Communications Division.