

# Supplier Code of Business Conduct

October 2023

# A message

from Avangrid CEO Pedro Azagra Blázquez

At Avangrid, we're focused on working together to build a more accessible clean energy model that promotes healthier, more sustainable communities. Fulfilling this purpose requires that we do more than just follow laws and regulations. We must all also hold ourselves to the highest ethical standards when working with our customers, shareholders, regulators, co-workers, and other stakeholders. To support these objectives and to provide guidance on how we conduct business, Avangrid has adopted a Code of Business Conduct and Ethics that is available on our public website.

Just as we hold our own employees accountable, we expect you, our suppliers, to embrace the same commitment to integrity and to conduct your business in compliance with all laws, rules and regulations. While as a supplier, you are legally separate from Avangrid, your business practices and actions can impact and reflect on our company and reputation. To help you understand the expectations for our business relationship with you, this Supplier Code of Ethics (the code) has been established to provide guidance on what we expect from you. Further expectations are also provided within the contractual terms and conditions for our business relationship.

Your workforce, agents, and subcontractors must also be made aware that we expect them to understand and comply with the standards


established in this code. They should also understand the terms and conditions of our agreements, and the way to report issues and concerns to us. Similarly, they should know that non-compliance could alter our business relationship and result in termination.

In addition to complying with the code, you must contact us when you become aware of potentially unethical or illegal practices by your team or others. Only demonstrating a clear commitment to this code and refusing to tolerate legal and ethical violations by others will help us reach our goals. We cannot emphasize enough the importance of promptly speaking up if you see something that you believe is wrong.

Thank you for the service you provide Avangrid, our affiliates, and our customers. As one of our suppliers, you continue to be an important part of our ongoing success. We truly value our shared commitment to conducting business with integrity, honesty and compliance with the law.

**Pedro Azagra Blázquez**  
Chief Executive Officer,  
Avangrid





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### Health and Safety

Above all, Avangrid is committed to the health, safety and well-being of all our employees, contractors and members of the public. The goods and services you provide must meet the ethical and legal standards described in this Code. This includes knowing and fully complying with all applicable laws, rules and regulations. As an Avangrid supplier, you are expected to provide and promote a safe and healthy working environment that supports accident prevention and minimizes risk to

all individuals involved in the work that you undertake for us. Promoting a safe and healthy working environment also includes taking immediate action to address and report unsafe conditions; ensuring contract workers and subcontractors are trained and knowledgeable on safety guidelines and procedures; following record retention rules; planning for emergency preparedness and response; and ensuring contract workers and subcontractors are free from the effects of alcohol and illegal drugs.

Every year since 2019, Avangrid has been designated one of the World's Most Ethical Companies® by the Ethisphere Institute, a global leader in defining and advancing standards for ethical business practices. In 2021, Avangrid was one of nine honorees in the “Energy and Utilities” category. Ethisphere also extended Avangrid’s Compliance Leader Verification certification through 2024. First earned by Avangrid in 2019, this certification is awarded to companies with best-in-industry corporate compliance programs.



Avangrid maintains a zero-tolerance approach to any type of bribery, fraud or corrupt practice.

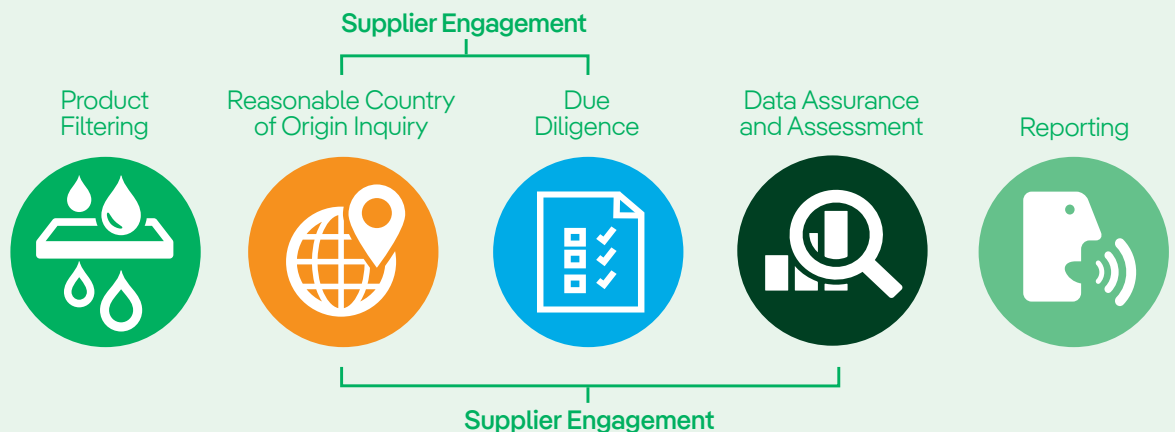
### Environmental Protection and Sustainability

Avangrid is committed to protecting and conserving the environment for the benefit of all our stakeholders. We want our suppliers to have a similar level of commitment to sustainability and the environment. We're committed to promoting supplier partnerships in line with U.N. Sustainable Development Goal (SDG) Goal 17. We expect you to understand the environmental issues associated with the production of goods and services that you provide and abide by the letter and the spirit of all associated federal, state, and local environmental laws, rules, and regulations, including proper handling of all potentially hazardous or regulated materials. We also expect that you will commit to minimizing your production of hazardous air emissions through methods such as conservation and the use of clean and renewable energy sources.

### Anti-Corruption and Bribery

As our supplier, you and your affiliated entities are required to conduct business activities in compliance with all applicable laws, rules, and regulations. Avangrid maintains a zero-tolerance approach to any type of bribery, fraud, or corrupt practice. Consequently, we require you as our supplier not to engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage or influence. You are required to abide with all applicable anti-corruption laws, rules, and regulations, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and any other applicable international anti-corruption conventions. Avangrid further requires our suppliers not to engage in activities that would violate, or cause Avangrid to violate, applicable international trade and export laws, including regulations of the Office of Foreign Assets Control (OFAC) of the U.S. Department of Treasury.

## 5 Step Process for Conflict Minerals Compliance







You are expected to have measures in place to protect employees, agents, and contractors against retaliation if they provide information in good faith of illegal or unethical practices. Common measures could include communicating anti-retaliation policies and maintaining helpline reporting systems that allow for anonymous complaints. As an Avangrid supplier, you may be asked to provide evidence of your internal policies and procedures related to the detection and prevention of illegal or unethical practices, including bribery and corruption. State and federal laws support Avangrid's policy of speaking up, e.g., the Maine Utility Accountability Act.

### Fair Competition and Antitrust

Avangrid is committed to both the letter and the spirit of fair competition and antitrust laws to ensure a free and open market. You are required to comply with all such laws and consult your own legal counsel. In addition, you must comply with our procedures designed to promote integrity and fair competition. Examples of prohibited conduct include (but are not limited to) agreements with a competitor to fix prices or other terms and conditions, to rig bids (such as in response to an RFP), to unfairly use confidential information, or to divide or not compete in certain markets. You must conduct your business with integrity, avoiding misrepresentation of your products and services, and those of your competitors.

### Use of Avangrid's Assets

You must use Avangrid assets for the purpose for which they were provided, complying at the same time with all contractual terms and environmental, health and safety laws and regulations. You may not use, reproduce, access, modify, download, distribute, copy or retain any works, trademarks, patents or other intellectual property belonging to or created for Avangrid. You must comply with all information protection, data security and privacy laws in connection with your work for Avangrid. You may not use information or data obtained in connection with your work Avangrid to trade the securities of Avangrid or our affiliates.



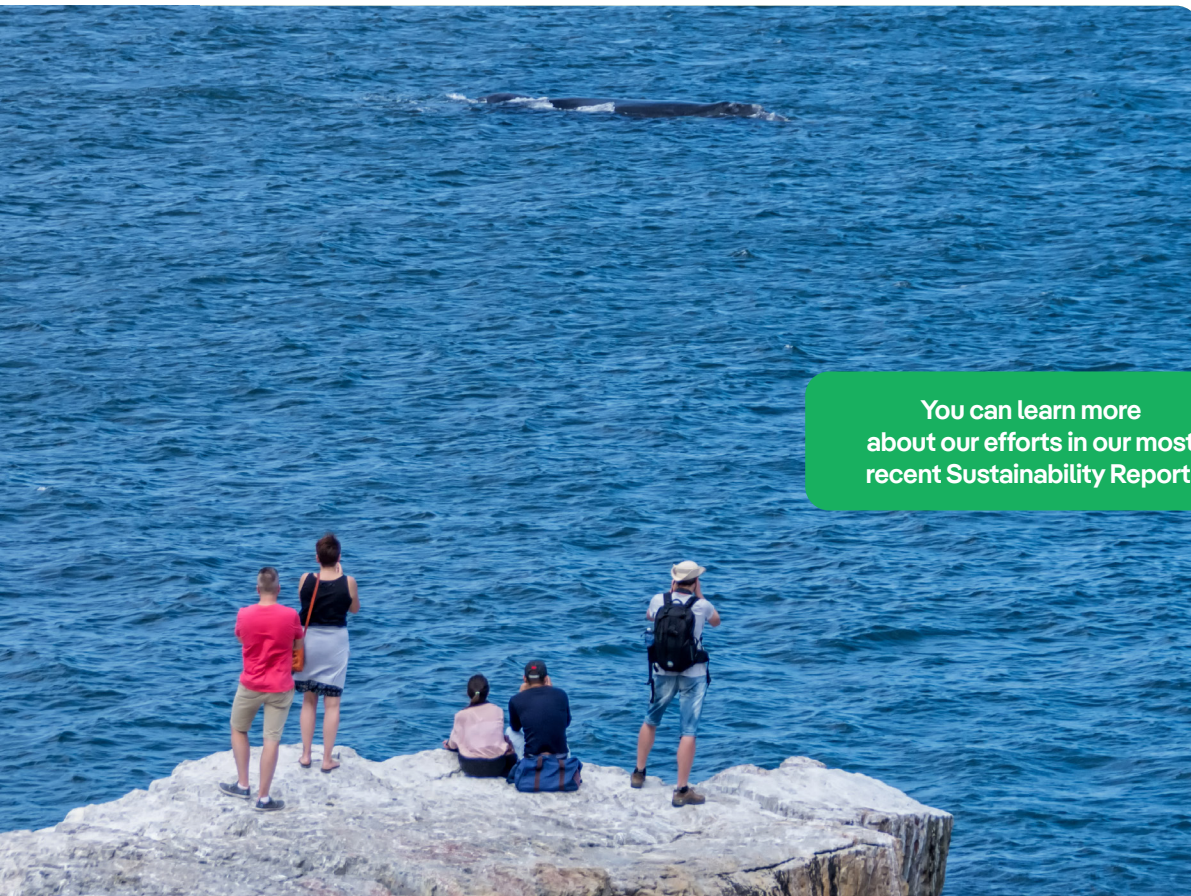


### Regulatory and Affiliate Requirements

Most of Avangrid's businesses are subject to state and federal regulatory rules and laws. When working with Avangrid and its affiliates, we expect you to understand and comply with the relevant regulatory requirements and rules. Our federal and state regulators have established clear rules that govern how transactions and information sharing can be undertaken between our state regulated network business and our unregulated Avangrid affiliates. These rules are documented in the respective Code of Business Conduct and Ethics for each Avangrid business, and you are expected to be aware of and abide by them. It is your responsibility to ask your Avangrid contact if you have questions or concerns regarding complying with these requirements.

### Conflict Minerals

Avangrid supports the purpose of Section 1502 of the Dodd-Frank Act relating to conflict minerals (Conflict Minerals Rule). Conflict minerals include gold, tin, tungsten, or tantalum originating from the Democratic Republic of the Congo, or an adjacent country, including recycled or scrap materials traceable to this region. We expect that you, as a supplier, have controls and policies in place to ensure that you are in compliance with the Conflict Minerals Rule and do not supply products containing conflict minerals. If you believe that conflict minerals are contained within products supplied to us, you must investigate and disclose your findings to us regarding the origin of the suspected conflict mineral.



You can learn more  
about our efforts in our most  
recent Sustainability Report.





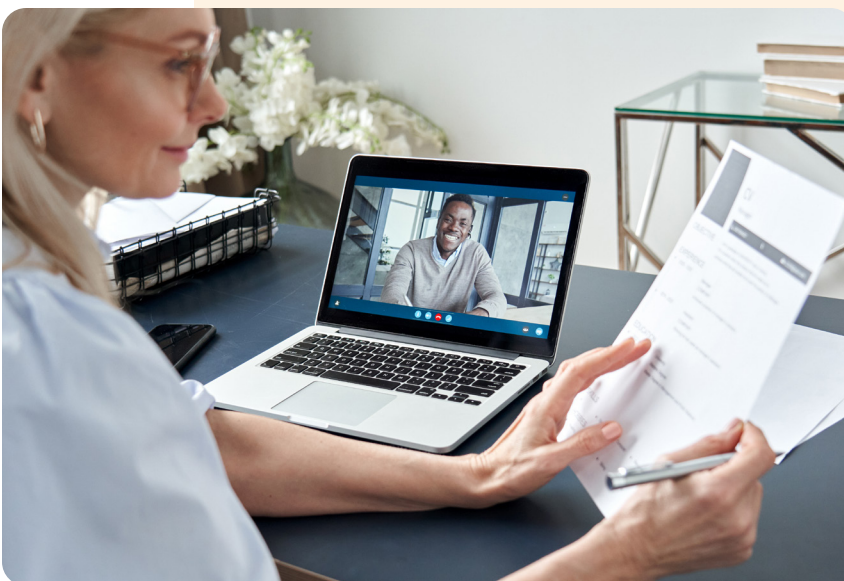


### Respect for Human Rights

Respect for human rights is a fundamental value at Avangrid. Our approach is guided by international human rights principles in the Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the Sustainable Development Goals approved by the member states of the United Nations.

Across the value chain, we are committed to respecting and protecting human rights. Therefore, you are expected as our supplier to comply with all applicable employment laws, rules, and regulations, including state, federal, and local laws and regulations regarding:

- Equal opportunity and non-discrimination
- Forced or compulsory labor (including slavery, use of prison labor and human trafficking)
- Migrant labor
- Child labor, including minimum hiring age limits
- Freedom of association and collective bargaining
- Fair remuneration
- Workplace harassment
- Working hours and payment of wages, including minimum wages, overtime, and social security benefits
- Health and safety
- Whistleblower protections



Additionally, we also expect you to:

- Refrain from discriminatory practices and protect the rights of ethnic minorities and indigenous peoples in the countries where you do business.
- Demonstrate courtesy, honesty, and respect for others in your dealings with Avangrid employees, agents, and other contractors. Avangrid will not tolerate behavior that might discriminate, intimidate, harass, disrupt or interfere with anyone performing work on our behalf.



### Conflicts of Interest

As an Avangrid supplier, you must avoid actual or potential conflicts of interest with Avangrid and its affiliates. Generally speaking, a conflict of interest is a situation where your personal interests, as a supplier, could directly or indirectly conflict with the best interests of Avangrid or its affiliates.

This includes having:

- a significant financial interest in another company in our industry, such as a competitor
- a family member or other close personal relative working for Avangrid or its affiliates
- access to Avangrid's proprietary information while contracting with competitors

Should an actual or potential conflict of interest arise, you are expected to immediately disclose it to your Avangrid contact.



### Gifts and Hospitality

As a supplier, you should not offer or give to Avangrid employees gifts or hospitality to that would violate our Code of Business Conduct and Ethics. Avangrid generally permits limited gifts and hospitality that will not create an appearance of obligation or favoritism. Our employees must also disclose offers of gifts and entertainment valued at more than \$100 through our Gift Registry. You may contact our Compliance Unit at [corporatecompliance@avangrid.com](mailto:corporatecompliance@avangrid.com) for guidance.



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### **Reporting Concerns**

No code, however comprehensive, can anticipate and address every ethical situation you may encounter when working with Avangrid and its affiliates. This Code must be complemented by your good judgment and common sense. Situations will arise where you need clarification or more information to make the right decision. You are responsible for recognizing these situations and acting accordingly, including informing Avangrid.

Avangrid's Compliance Unit is authorized to interpret this Code and its requirements, and the Chief Compliance Officer is authorized to issue amendments or waivers.

There are many methods for you to raise concerns, questions, or non-compliance matters, including speaking directly with your Avangrid contact. Avangrid also operates an Ethics and Compliance Helpline where you have the option to report matters anonymously, if you choose.



### Avangrid Ethicspoint Helpline

Avangrid has a strict non-retaliation policy for individuals who report concerns in good faith. Punishment, penalties and all other forms of retaliatory action against individuals for reporting an ethical or compliance concern in good faith are strictly prohibited. State and federal laws support Avangrid's policy of speaking up and prohibit retaliation against employees and contractors who report concerns in good faith (e.g., the Maine Utility Accountability Act).



Visit [avangrid.com](https://www.avangrid.com)  
compliance policies and our code  
of business conduct and ethics.



Every report made to the Helpline is taken very seriously.  
The Helpline is for all Avangrid suppliers.

**877.606.9171**  
[avangrid.com/speakup](https://www.avangrid.com/speakup)  
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