Human Rights Policy

February 16, 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 Human Rights 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

Respect for human rights is fundamental to the sustainability of the AVANGRID Group and the communities in which we operate. We are committed to ensuring that people are treated with dignity and respect. We recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions. Central to our respect for human rights is our commitment to the rule of law and to compliance with the law wherever we operate. We expect our business partners, both internal and external, to have the same commitment. This policy is guided by, consistent with, and reflects the international human rights principles encompassed 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, the Children's Rights and Business Principles, and the Sustainable Development Goals (SDGs) approved by the member states of the United Nations.

2. Principles

a) We respect and abide by internationally recognized human rights principles and are committed to treating people with dignity and respect, refraining from discriminatory practices, and protecting the rights of children, ethnic minorities, indigenous peoples, immigrants, migrant workers, and local communities.

b) We respect employees' rights to associate, form or join trade unions and workers' rights to collective bargaining, subject to applicable law and regulations.

c) As part of our commitment to human rights, we have established internal and external mechanisms to help identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities. In addition, AVANGRID will continue to look for ways to promote and advance human rights within our sphere of influence.

d) We prohibit the use of child labor, forced labor, prison labor, slavery, human trafficking, and any other form of modern slavery.

e) We are committed to treating all of our employees with respect and dignity and cultivating inclusive diversity in the workplace. Our Governance and Sustainability System adheres to all applicable domestic laws and is consistent with the United Nations Guiding Principles on Business and Human Rights and the ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace. Our employees are paid at least the minimum legal wage or, where no wage law exists, the local industry standard.

f) We recognize that we are part of a broader community wherever we operate. In the communities where we operate, we believe that engaging stakeholders—including those from more at-risk populations—is fundamental to our respect for human rights. Where practical, we are committed to dialogue and engagement with all relevant parties in an effort to understand, assess and address areas of concern as appropriate.

g) We maintain an Environmental, Health and Safety Policy. We are committed to providing a safe and healthy workplace and complying with applicable safety and health laws, regulations and internal requirements.

h) We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

i) Training is an important part of effective human rights practices. We continue to work to build awareness about our human rights policies and procedures and report on our progress in our Sustainability Report.

j) In addition, we have adopted measures to detect human rights violations and, where appropriate, report such violations to the competent government authorities.

k) All of our suppliers are required to abide by the Supplier Code of Ethics, pursuant to which they (i) are prohibited from using forced labor, prison labor, child labor, slavery, and human trafficking and must develop the necessary measures to eliminate and prevent the use of forced labor; (ii) must adhere to all applicable domestic laws and are consistent with the United Nations Guiding Principles on Business and Human Rights and the ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor and underage workers in the workplace; and (iii) must refrain from engaging in discriminatory practices and treat all their employees in a manner that respects human rights.

l) We endeavor to create workplaces in which open and honest communication among all employees is valued and respected. If you believe that a conflict arises between the language of the Policy and the laws, customs and practices of the place where you work, if you have questions about this Policy, or if you would like to report a potential violation of this Policy, you should raise those questions and concerns through existing processes, which make every effort to maintain confidentiality. You may ask questions or report potential violations to your direct supervisor, members of senior management, Human Resources, or the Compliance Division. Employees can also report suspected violations through the Helpline secured website at www.ethicspoint.com or by calling 887-606-9171. No reprisal or retaliatory action will be taken against any employee for raising concerns under this Policy in good faith.

m) We are committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

n) The Board of Directors, through the Governance and Sustainability Committee, will oversee implementation of and compliance with this Policy by the AVANGRID Group and the Governance and Sustainability Committee will regularly report to the Board of Directors, providing periodic information on the measures and procedures adopted within the AVANGRID Group to implement and monitor the provisions of this Policy.