

Operational Resiliency Policy

October 15, 2025

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 wholly-owned subsidiary of Iberdrola, S.A. and a member of the group of companies controlled by Iberdrola, S.A. (the “Iberdrola Group”). The Board of Directors of Avangrid (the “Board of Directors”) has approved this *Operational Resiliency Policy* (this “Policy”) to assist in exercising its responsibilities to Avangrid and its Stakeholders (as defined in Avangrid’s *Stakeholder Engagement Policy*). 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. This Policy aligns with and further develops the principles contained in the *Operational Resiliency Policy*, the *Purpose and Values of the Iberdrola Group*, and the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* approved by the Board of Directors of Iberdrola, S.A. from time to time.

1. Scope of Application

This Policy applies to the Avangrid Group and reflects the basic principles established at the Iberdrola Group level that, in the area of sustainable value chain, and particularly operational resiliency, complement those contained in the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* and informs the conduct and standards-setting implemented by the other companies of the Avangrid Group in this area in the exercise of their powers and in accordance with their autonomy.

For companies that do not form part of the Avangrid Group but in which Avangrid holds an interest, as well as for joint ventures, temporary joint ventures, and other entities in which it assumes management, Avangrid shall also promote the alignment of its regulations with the basic principles regarding the sustainable value chain, and particularly operational resiliency, contained in this Policy.

2. Purpose

This Policy seeks to protect Avangrid critical business operations by providing the framework for a consistent, planned, and coordinated response to internal and external disruptive circumstances, events, or crises of any nature that might unexpectedly involve a significant degradation or disruption in the normal operations of Avangrid. The underlying purpose of operational resilience at Avangrid is to preserve the organization in the face of disruptive situations that put essential aspects of the organization at risk, and it includes Avangrid’s viability, limiting the impact of the event to the extent possible, reestablishing a situation of stability in the shortest possible time, and adopting appropriate lessons and improvements. Operational resilience includes both business continuity and crisis management practices and procedures.

3. Main Principles of Conduct

Avangrid adopts and promotes the following main principles of conduct that must inform all of its activities in the area of operational resilience:

- a) Define the continuity strategies and plans, endeavouring to ensure continuity of operational capacity and strengthening resilience, in order to minimize the impact of disruptive events or crises that might affect business continuity, to be regularly tested to improve and validate their capacities and response.
- b) Establish a comprehensive management process to lead, direct and supervise Avangrid's activities in response to disruptive incidents or crises that might have an impact on Avangrid or at the Iberdrola Group level as a whole.
- c) In relation to the external and internal context, including the political environment, assess the social, economic, legal and cultural aspects, the technological and competitive context, internal capacities, resources and decision-making processes to address disruptive incidents or crises.
- d) Promote the continuous improvement of processes by measuring, evaluating and reporting on the performance and effectiveness of the results of the operational resiliency plans of Avangrid and at the Iberdrola Group level.
- e) Allocate appropriate resources for the performance of the duties and responsibilities corresponding thereto established in the *Operational Resilience Model* (as described below) and in the operational resiliency plans.
- f) Develop, provide and continuously improve the education and training of the staff assigned to the duties defined in the *Operational Resilience Model*.
- g) Promote a culture of operational resiliency and awareness within Avangrid, through an updated and continuous training program.
- h) Via the *Operational Resilience Model*, implement a formal, documented and measurable management system that defines the framework of activities for the operational resiliency plans of Avangrid's companies, endeavouring to ensure continuous improvement in order to achieve its goals.
- i) Conduct regular Business Impact Analyses and risk assessments to identify critical services, dependencies, and recovery objectives, ensuring alignment with organizational risk appetite and regulatory requirements.
- j) Define and approve impact tolerances for critical services, including maximum tolerable downtime and minimum viable service levels, to guide resilience strategies and response actions.
- k) Integrate incident response and crisis communication protocols into the operational resilience framework, ensuring timely internal and external notifications, including regulators and customers, during disruptive events.
- l) Establish third party and supply chain resilience requirements, including contractual obligations for continuity, incident reporting, and evidence of testing for critical vendors and service providers.
- m) Ensure independent assurance and continuous improvement, including periodic internal audits and lessons learned from incidents and exercises, to maintain program effectiveness and maturity.

4. Iberdrola Group Level Coordination: The Operational Resiliency Model

The Security and Resilience Division of Iberdrola, S.A. (or such division as assumes the powers thereof at any time, through the Security, Resilience and Digital Technology Committee of Iberdrola, S.A. (or such committee as assumes the powers thereof at any time) establishes and regularly reviews the *Operational Resiliency Model*, which is prepared in accordance with the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* and

Iberdrola's *Operational Resiliency Policy*, which define the methodologies, procedures and tools required for the Iberdrola Group's companies operational resiliency.

The *Operational Resiliency Model* allows the Avangrid Group to ensure compliance with responsibilities of providers of essential services, such as electricity supply or an owner of critical infrastructure; support the strategic goals of the Iberdrola Group; protect Avangrid's reputation and credibility; reduce the costs of disruptive shut downs; protect life, property and the environment; improve capacity to remain effective during disruptions; and maintain proactive and efficient control of risks.

Based on the *Operational Resiliency Model*, the Avangrid Group will create operational resiliency plans that set out tasks to be carried out each year within the Avangrid Group, with the aim to effectively deploy, implement, and execute the *Operational Resiliency Model*.

To this end, Avangrid's Corporate Security and Resilience Division (or such division as assumes the powers thereof at any time) shall:

- (i) supervise the effective implementation of the basic principles of action of this Policy through the *Operational Resiliency Model*;
- (ii) act in coordination with the Security and Resilience Division (or such division as assumes the powers thereof at any time) of Iberdrola, S.A.;
- (iii) coordinate with Avangrid's corporate and business departments to prepare and periodically review operational resiliency plans for each area; and
- (iv) identify and establish rules, standards, and procedures in the area of operational resiliency and ensure the implementation of programs, processes, and tools for the performance of the resiliency function.

Avangrid's Security, Resilience and Digital Technologies Committee (or such committee as assumes the powers thereof at any time) (the "Committee") ensures and monitors the creation, definition, review, and implementation of Avangrid Group operational resiliency plans, which include operational resiliency risks specific to each business region or area. The Committee shall monitor the status of the *Operational Resiliency Model* and its level of implementation within the Avangrid Group and shall coordinate with the Security, Resilience and Digital Technologies Committee (or such committee as assumes the powers thereof at any time) of Iberdrola, S.A. The Avangrid resiliency division shall coordinate and supervise the implementation of all Avangrid Group operational resiliency plans.

5. Implementation and Monitoring

For the implementation and monitoring of the provisions of this Policy, the Board of Directors is assisted by the Corporate Security and Resilience Division (or such division as assumes the powers thereof at any time), through the Committee, which shall establish a procedure for regular monitoring and reporting to the governance bodies.