

Corporate Reputation Policy

April 9, 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 *Corporate Reputation Policy* (this “Policy”) to assist in exercising its responsibilities to Avangrid and its stakeholders. 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 *Corporate Reputation 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. This Policy supplements and further develops the *Stakeholder Engagement Policy approved by the Board of Directors from time to time*.

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1. Purpose

The purpose of this Policy is to establish the main principles of conduct that must govern the measurement and management of the corporate reputation, in order to identify and consider the perceptions and legitimate expectations of Avangrid’s stakeholders.

The management of Avangrid’s corporate reputation relating to the minimization and mitigation of the reputational risk inherent in its activities is set forth in the *Guidelines and Limits on Reputational Risk*, approved by the Board of Directors, which establish a framework of reference for the control and management of reputational risk, within the general guidelines established in the *General Risk Control and Management Foundations of the Iberdrola Group*.

2. Main Principles of Conduct

Avangrid adopts and promotes the following main principles of conduct in relation to the measurement and management of corporate reputation provided for in this Policy:

- a. Disseminate and internalize that the reputation of the Avangrid Group is a fundamental component for the creation and protection of value, both for Avangrid and the other companies of the Iberdrola Group.
- b. Involve its professionals in reputation management, given that they establish relationships with stakeholders, make decisions, carry out business activities, and communicate the culture, opinions and decisions of Avangrid.
- c. Promote a preventative culture for the purpose, on the one hand, of obtaining stable or increasing levels of reputation and, on the other hand, of mitigating, to the extent possible, the appearance and development of situations that entail significant and sudden drops in reputation levels.

- d. Define models and tools for measuring reputation, segmented by stakeholders, which make it possible to evaluate and monitor reputation levels through different types of indicators, both qualitative and quantitative.
- e. Regularly evaluate the management of corporate reputation.
- f. Promote the application of the principles of business ethics and responsible behavior of its professionals, in order to avoid improper conduct or acts that are illegal or contrary to the Governance and Sustainability System.
- g. Proactively manage its stakeholders in order to incorporate their expectations and deploy measures and actions for improvement.
- h. Assess, for membership and participation in external entities, whether such entities contribute to the perception that their stakeholders have of Avangrid, with such membership and participation in any event being consistent with the *Purpose and Values of the Iberdrola Group*, the Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group, and in accordance with the provisions of the *Stakeholder Engagement Policy* in all cases.
- i. Protect and contribute to the value of the Iberdrola brand by following the main principles of conduct established in the *Iberdrola Brand Policy* in order to use it as a lever that contributes to reputation.
- j. Promote appropriate training of its professionals in matters that have or may have an impact on corporate reputation.
- k. Monitor the standards and policies of the Governance and Sustainability System that contain elements relevant to corporate reputation and identify indicators related to the expectations of its stakeholders.
- l. Integrate the latest and most innovative trends in corporate reputation, and particularly identify future trends relating to the expectations of its stakeholders, as well as good practices to be shared throughout the companies of the Iberdrola Group.

3. Management and Measurement of Corporate Reputation

The management of corporate reputation shall mainly be performed through:

- a. the relationship with stakeholders, which allows an understanding of their expectations and needs, analyze risks (including reputational risks) and establish specific action and improvement actions to optimize the expectations of each stakeholder group; and
- b. action plans, which are measures aimed at modifying or supplementing the operations of Group's companies in order to communicate the Company's performance or, where appropriate, to better meet the expectations of one or more of its stakeholders.

The foregoing is reported and monitored through the implementation of the *Global Stakeholder Engagement Model of the Iberdrola Group* (provided for in the Stakeholder Engagement Policy).

Corporate reputation is monitored and measured through a specific scorecard that incorporates, among other things, variables from reputational rankings, surveys among stakeholders, panels, and specific studies on changes in reputation levels and sustainability indices.

Avangrid also performs quantitative and qualitative analyses to assess the perception of the media, social media and opinion makers and, where necessary, develops specific communication plans in order to improve the perception of the positioning of Avangrid and the other companies of Avangrid Group on certain matters of interest in line with the expectations of their respective stakeholders.

Avangrid may engage specialized external advisors to measure and identify the impact of the activities and communications of the Avangrid Group on corporate reputation.

4. Group-Level Coordination

The Sustainability and Reputation Committee of Iberdrola (or such committee as assumes the powers thereof at any time), oversees the coordination of the supervision and management of the corporate reputation of Iberdrola and of the other companies of the Iberdrola Group.

To this end, it: (i) defines the basic guidelines for the improvement of reputation at the Group level; (ii) supervises the results and effectiveness of existing measurement tools; (iii) approves and monitors action plans; (iv) collaborates in the preparation of public information on corporate reputation disclosed by Iberdrola and, if applicable, by the other companies of the Iberdrola Group; (v) establishes the necessary coordination mechanisms with the corporate and business divisions of Iberdrola, as well as with the corresponding sustainability and reputation committees of the country subholding companies; and (vi) prepares procedures or manuals for the management of reputational aspects in crisis situations, the guidelines for action of which must be coordinated, if applicable, with the resilience plans.

5. Implementation and Monitoring

For the implementation and monitoring of the provisions of this *Policy*, the Board of Directors is assisted by the Sustainability Division (or such divisions as assumes the powers thereof at any time), which shall establish a procedure for regular monitoring and reporting to the governance bodies and which shall act in coordination with the appropriate corporate areas at the Iberdrola Group, in accordance with the Iberdrola Group's procedures for such purpose.