Digital Technology Policy

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 Board of Directors of Avangrid (the "Board of Directors") has approved this *Digital Technology 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 *Digital Technology 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. Purpose

The purpose of this *Policy* is to establish the global framework for the governance and proactive management of processes and actions related to digital technology, understood as information and operational technology, recognizing their importance as a key resource to achieve the objectives of the Avangrid Group and ensure the effective and efficient operation of the business processes, promoting a coordinated approach on architecture, security and potential convergences with other technologies, minimizing operational and security risks, as well as ensuring the continuity thereof.

For purposes of this *Policy,* terms shall have the following meaning:

(i) **information technology** ("**IT**") is the set of physical or material components that compromise a computer or information system ("***Hardware***") and the set of IT programs, instructions, data and rules to execute certain tasks on a computer ("***Software***") used for handling data, focused on the management and protection of digital information, including general communication networks, data storage and processing and management systems.

(ii) **operational technology** ("**OT**") is the Hardware and Software used to control and interact with physical industrial processes in real time, including local control systems, SCADA ("Supervisory, Control and Data Acquisition"), remote operation systems and telecommunications between them.

2. Main Principles of Conduct

Avangrid adopts and promotes the following main principles of conduct that must inform its activities related to the use of digital technology:

(i) *Continuity of operations:* Endevor to ensure the continuity of operations that procure the provision of services, applying standards of high availability and resilience, developing business continuity, contingency and disaster recovery plans, all in accordance with the *Security Policy,* the *Operational*

Resiliency Policy, the *General Risk Control and Management Foundations of the Iberdrola Group* and the *Digital Technology Risk Guidelines and Limits,* approved by the Board of Directors from time to time.

(ii)   *Operational efficiency:* Push IT and OT assets operate with the utmost efficiency, optimizing personal and material resources and their costs during the asset life cycle, based on reliable processes and technologies that secure high availability of facilities, applying the best practices and recognized standards.

(iii)   *Risk management:* Promote the proactive identification and management of risks in the devices, systems and processes associated with digital technology, ensuring that identified risks are within the thresholds deemed appropriate, particularly those related to security, natural capital, business continuity and those associated with facilities classified as critical according to applicable legal provisions. This particularly includes the planning, implementation and use of solutions that allow for the identification, protection and detection of, response to and recovery from cybersecurity risks, in coordination with the *Corporate Security Policy* and the *Operational Resiliency Policy,* as well as with the *Cybersecurity Risk Guidelines and Limits.*

(iv)   *Technological innovation and life cycle:* Promote principles for the secure design, planning, implementation, operation, decommissioning and replacement of IT and OT equipment and systems.

In this regard, the companies of the Avangrid Group shall aim to remain at the forefront of new technologies so that they can be exploited and generate value for their respective businesses, in coordination with the innovation strategy established at the Group level, and to achieve strategic goals and defined objectives. They shall also favor participation in domestic and international standardization groups, as well as the selection of open standards that avoid confinement.

(v)   *Sustainability and social responsibility:* Encourage the selection of technology that optimizes energy efficiency and the reduction of consumption, energy losses and greenhouse gas emissions. In particular, special attention shall be paid to ensuring that the devices, systems and processes associated with digital technology do not harm the health of professionals, users, customers and society in general.

(vi)   *Training and awareness-raising:* Encourage the appropriate preparation and training of planners, developers, maintenance personnel and users of digital technology, based on their profile, to understand the risks associated with this technology.

3.   **Implementation and Development**

For the implementation and monitoring of the provisions of this *Policy*, the Board of Directors is assisted by the Information Technology Division (or such division 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 Ibedrola Group's procedures for such purpose.

The Information Technology Division (or such division as assumes the powers thereof at any time) shall review this *Policy* at least once per year to ensure that the content thereof conforms to the ongoing progress, innovations, risks and regulatory changes that are occurring in the area.

Avangrid