

Internal Reporting and Whistleblower Protection System

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 *Internal Reporting and Whistleblower Protection System* (this “System”) to assist in exercising its responsibilities to Avangrid and its Stakeholders (as defined in Avangrid’s *Stakeholder Engagement Policy*). This System is subject to periodic review and modification by the Board of Directors. This System 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 System aligns with and further develops the principles contained in 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 System also supplements and further develops the *Compliance Policy*, the *Code of Business Conduct and Ethics*, and the *Anti-Corruption Policy* approved by the Board of Directors from time to time.

1. Avangrid’s Internal Reporting System

Avangrid is committed to creating an environment of transparency and fostering respect for the law and the rules of conduct established in the Governance and Sustainability System, including the *Code of Business Conduct and Ethics*, by its directors, officers, employees and its suppliers. To that end, Avangrid has implemented an internal reporting system to encourage directors, officers, employees and third parties to report suspected fraudulent or illegal conduct or any other conduct that may entail a breach of Avangrid’s Governance and Sustainability System, including the commission of any act contrary to the law or to the rules of the *Code of Business Conduct and Ethics*. The internal reporting system respects the provisions of the Purpose and Values of the Iberdrola Group and the Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group. The Compliance Unit is responsible for managing Avangrid’s internal reporting system.

Avangrid’s internal reporting system is designed and managed in a secure manner to ensure: (1) that Avangrid maintains internal reporting channels, which allow directors, officers, employees or other interested third parties to report any crimes, conduct, or acts that are allegedly improper, illegal, or contrary to law or to the Governance and Sustainability System; (2) the confidentiality of the identity of any whistleblower and, to the extent feasible, of any third party mentioned in a report; (3) the protection of personal data, including preventing access to the content of the investigation by unauthorized personnel; and (4) that the reports submitted through the internal reporting channels can be dealt with effectively within Avangrid. Communications through the internal reporting system may be made anonymously and shall be processed, and investigated where appropriate, in accordance with procedures established pursuant to the *Regulations of the Compliance Unit* and related Compliance Unit protocols for reporting to the Avangrid Audit and Compliance Committee (the “Committee”).

Avangrid employees are obligated to make reports about any of the following:

- (a) Unethical business conduct or a violation or suspected violation of any Avangrid policy including the *Code of Business Conduct and Ethics*;
- (b) A violation or suspected violation of state or federal law;

- (c) A violation or suspected violation of accounting standards, internal accounting controls or audit matters; or
- (d) Substantial specific risks to the employee's, or public's, health and safety.

Avangrid employees can make reports to their managers, the People and Organizations Division, the Compliance Unit, members of the Avangrid leadership team, or through the internal reporting system. The internal reporting system is available for all Avangrid directors, officers, employees, suppliers and other third parties to make anonymous reports by telephone toll-free and by direct online submission. The Compliance Unit is responsible for overseeing the operation of the internal reporting system under the direction of the Committee. The internal reporting system is staffed by an independent service provider 24 hours a day, every day, and can be accessed at the following:

Toll-free: 833-910-3820

Online: [avangrid.com/compliance-helpline](https://www.avangrid.com/compliance-helpline)

Once a report is made through the internal reporting system, the independent service provider who manages the internal reporting system will submit a written report to the Compliance Division. The Compliance Division will then follow-up on the report and initiate an investigation if appropriate, referring the matter internally to an Avangrid investigator with appropriate subject matter expertise. The report and the investigation details will be kept confidential, subject to legitimate business need.

The Committee shall also be notified of reports that could have a material impact on Avangrid's financial statements or internal controls. For these purposes, the Compliance Unit shall inform the Committee of the report and provide documentation it may request in relation to the investigation.

For reports involving a member of the Board of Directors of the company, Avangrid will retain an independent investigator consistent with the procedure outlined in Compliance Unit protocols. Similarly, severe allegations that may materially impact Avangrid will be expedited to the Committee consistent with such protocols. Employees who (i) commit such severe violations; (ii) are aware of such violations and fail to report them; or (iii) make a report of a malicious nature or based solely on rumor, gossip, or knowingly false information, will be subject to disciplinary action up to and including termination of the relationship with Avangrid. Adverse action will not be taken against an employee who it is found made a good-faith report.

2. Whistleblower Protection and Safeguards

Speaking up is key to the success of the Avangrid compliance program and protecting Avangrid. Avangrid strictly prohibits retaliation against individuals who report violations in good faith pursuant to this System. Avangrid, its directors, officers, employees, and third party contractors are prohibited from taking any retaliatory actions against any person within the Avangrid Group or third party who makes a report, or anyone who assists the whistleblower in making their report.

Retaliation may include direct or indirect actions, including any negative job-related action such as demotion, discipline, termination, salary reduction, or detrimental job or shift reassignment. The following actions also can be considered forms of retaliation depending on the particular facts and circumstances:

- (a) Suspension of an employment contract, dismissal or termination of employment or relevant relationship with the Avangrid Group;
- (b) Imposition of any disciplinary measure;
- (c) Demotion or denial of promotion or any other material change in working conditions;

- (d) Decision to not convert a temporary employment contract into a permanent one;
- (e) Reputational damage;
- (f) Financial loss;
- (g) Coercion, intimidation, harassment or ostracism;
- (h) Negative evaluation or references regarding work or professional performance;
- (i) Blacklisting or dissemination of information intending to make it difficult for such person to be employed or hired elsewhere;
- (j) Denial or revocation of a license or permit;
- (k) Denial of training or participating in group events; and
- (l) Any form of discrimination or unfavorable or unfair treatment.

3. Implementation and Monitoring

For the implementation and monitoring of the provisions of this document, the Board of Directors has established the Compliance Unit, which proactively endeavours to ensure the application and effectiveness of the Internal Reporting System, all without prejudice to the responsibilities assigned to other bodies and divisions of Avangrid and shall develop the procedures required for this purpose.