Human Rights Policy

October 14, 2026

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 *Human Rights 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 *Policy on Respect for Human Rights*, 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 regarding respect for human rights established at the Iberdrola Group level and 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 respect for human rights contained in this Policy.

2. 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.

3. Main Principles of Conduct

a) Avangrid respects and aligns with the internationally recognized human rights principles and is 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) Avangrid respects 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 Avangrid's 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) Avangrid prohibits the use of child labor, forced labor, prison labor, slavery, human trafficking, and any other form of modern slavery.

e) Avangrid is committed to treating all of our employees with respect and dignity. Our Governance and Sustainability System adheres to all applicable domestic laws and is consistent with the internal human rights principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace. Avangrid employees are paid at least the minimum legal wage.

f) Avangrid recognizes 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) Avangrid monitors its third-party suppliers for human rights violations and utilizes contractual language to additionally minimize risks in this area.

h) Avangrid maintains 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.

i) Avangrid is 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.

j) Training is an important part of effective human rights practices. Avangrid continues to work to build awareness about our human rights policies and procedures and report on our progress.

k) Avangrid has adopted due diligence measures to identify situations and activities and manage above all those with a higher risk of violating human rights, in order to develop mechanisms for the prevention of such risk, as well as for mitigation and ultimate redress of the impacts if they occur. We evaluate the effectiveness of the due diligence processes on a regular basis using monitoring indicators, with special attention on those facilities in which there might be a higher risk of violating human rights.

Avangrid has in place reporting and grievance mechanisms, equipped with adequate guarantees and settlement procedures, in order to respond to potential violations of human rights.

l) In addition, Avangrid has adopted due diligence measures to detect human rights violations and, where appropriate, report such violations to the competent government authorities.

m) All of the members of Avangrid's supply chain are required to abide by the Supplier Code of Business Conduct, 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.

n) Avangrid endeavors 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 this 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 to the greatest extent practical in accordance with applicable law. You may ask questions or report potential violations to your direct supervisor, members of senior management, People and Organization, or the Compliance Unit. Employees can also report suspected violations through the Internal Reporting System secured website at www.avangrid.com/compliance-helpline or by calling 833-910-3820. No reprisal or retaliatory action will be taken against any employee for raising concerns under this Policy in good faith.

o) Avangrid is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

4. Group-Level Coordination

The Sustainability Division of Avangrid (or such division as assumes the powers thereof at any time), through the Sustainability and Reputation Committee, shall endeavor to ensure compliance with the provisions of the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group,* and Avangrid's *Code of Business Conduct and Ethics* and *Supplier Code of Business Conduct* with respect to human rights as well as this Policy, to the extent applicable thereto. It does this by coordinating with the relevant counterpart division of Iberdrola, S.A. and with the Sustainability and Reputation Committee of Iberdrola, S.A. and by supervising and coordinating with the relevant counterpart divisions and organizations across its subsidiaries, and further developing any procedures required for such purpose.

5. Implementation and Monitoring

For the implementation and monitoring of the provisions of this Policy, the Board of Directors, through the Audit and Compliance Committee assisted by the Sustainability Division of Avangrid (or such division as assumes the powers thereof at any time), through the Sustainability and Reputation Committee, will oversee implementation of and compliance with this Policy by the Avangrid Group and the Audit and Compliance 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, the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group,* and Avangrid's *Code of Business Conduct and Ethics* and *Supplier Code of Business Conduct* regarding respect for human rights. The Sustainability Division (or such division as assumes the powers thereof at any time) will be assisted by the Sustainability and Reputation Committee established by the Avangrid Group to promote monitoring compliance with this Policy and reporting on the results achieved.