

# Sustainable Human Capital Management and Anti-Harassment Policy

April 15, 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 *Sustainable Human Capital Management and Anti-Harassment 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 *Sustainable Human and Anti-Harassment 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 also supplements and further develops the *Human Rights Policy* approved by the Board of Directors 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 regarding sustainable human capital management that 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 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 management of human capital contained in this Policy.

## 2. Purpose

The Board of Directors considers its people to be Avangrid’s most strategic asset. Avangrid cares for all people of the Avangrid Group and endeavors to offer its employees a good, safe working environment based on equal opportunity that cultivates professional development and work-life balance. This Policy sets forth the main principles of a human capital management model that enables the Avangrid Group to recruit, hire, promote, and retain talent, encourages the personal and professional growth of its workforce, empowers all employees to share in the Avangrid Group’s success while furthering Avangrid’s strategic objectives.

## 3. Main Principles of Conduct

In the management of its people, Avangrid will:

- a) establish an appropriate framework of employee relations and measures that enable the Avangrid Group to operate pursuant to corporate and social requirements while promoting its strategic objectives;
- b) develop consistent people management processes that promote Avangrid's unique business culture in all companies of the Avangrid Group, while respecting and complying with all applicable laws and regulations;
- c) conduct employee relations based on equal opportunity, non-discrimination, and respect and promote a positive working environment that facilitates work and non-work/life balance and respect for employees' personal lives by fostering appropriate levels of digital connection to and disconnection from work responsibilities;
- d) establish competitive rewards programs that enable the Avangrid Group to recruit, hire, and promote the most qualified candidates and foster balance between work and non-work/life demands;
- e) appreciate the contribution of all employees to the Avangrid Group's successful business enterprise;
- f) establish measures to ensure that employees and prospective employees are not favored or discriminated against in the hiring and promotion processes while ensuring that the principle of equal opportunity is respected;
- g) throughout the talent recruitment, selection, hiring, and promotion process, ensure that all Avangrid Group employees act in an ethical, honest and professional manner and comply with all applicable laws, regulations and policies, including, without limitation, the Code of Business Conduct and Ethics;
- h) Avangrid is committed to maintaining a work environment free from all forms of unlawful discrimination and harassment;
- i) Avangrid prohibits discrimination and harassment against any employee or applicant based on race, color, marital status, religion, sex, sexual orientation, pregnancy, gender identity or expression, age, national origin or ancestry, citizenship status, physical or mental disability, genetic information, veteran status, uniformed service member status or any other status protected by federal, state or local law;
- j) Avangrid has established measures regarding hostile, offensive and intimidating conduct including policies and procedures prohibiting harassment, whether based on race, color, marital status, religion, sex, sexual orientation, pregnancy, gender identity or expression, age, national origin or ancestry, citizenship status, physical or mental disability, genetic information, veteran status, uniformed service member status or any other status protected by federal, state or local law and specific programs that support victims of domestic violence or crime; and
- k) Avangrid has a "zero tolerance" policy for retaliation against employees who report discrimination or harassment in good faith; punishment, penalties and all other forms of retaliatory action are strictly prohibited.

#### **4. Key Achievements**

In order to achieve these objectives, Avangrid has:

- a) adopted an *Equal Opportunity Policy* articulating Avangrid's commitment to cultivating equal opportunity for all applicants and employees and providing applicants and employees with a work environment free of violence, discrimination, harassment, and retaliation;
- b) adopted an *Environmental, Health and Safety Policy* setting forth the main principles guiding the Avangrid Group's efforts to create a safe and healthy work environment for all employees;
- c) established Avangrid's People and Organization Division, which provides consistent guidelines for the management of the Avangrid Group's employees and implements and monitors people management policies and procedures across the Avangrid Group;
- d) established channels of dialogue and communication with employees such as committees or subcommittees with employee members, employment climate surveys, meetings with senior management, employee meetings, and Avangrid's internal and external websites;
- e) implemented measures that enable employee participation in international mobility programs, which foster the exchange of experiences, knowledge and culture, professional development, and talent retention;
- f) established employee training and other wellness programs that foster equal opportunity and personal and professional growth; and
- g) established a group-wide environmental, health and safety system that reflects environmental, health and safety best practices, complies with and seeks to exceed all applicable health and safety requirements, and seeks continuous improvement.

## 5. Principles of Ethical Conduct

The Board of Directors has approved a *Code of Business Conduct and Ethics* that sets forth the principles of conduct required of all directors, officers and other employees of the Avangrid Group, regardless of job category or geographic or functional location. The Compliance Unit is responsible for promoting awareness of and ensuring compliance with the *Code of Business Conduct and Ethics*. The Compliance Unit resolves questions regarding the content, interpretation and application of the *Code of Business Conduct and Ethics*. The Compliance Unit also investigates complaints received concerning potential violations and works with other management groups to recommend remediation. The Compliance Unit maintains independence from management, reporting directly to the Audit and Compliance Committee of the Board of Directors.

## 5. Implementation and Monitoring

The Board of Directors is assisted by the People and Organization Division of Avangrid (or such division as assumes the powers thereof at any time), which is responsible for implementation of and compliance with this Policy by the Avangrid Group and 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 People and Organization Division of Avangrid (or such division as assumes the powers thereof at any time) shall coordinate with the Human Resources Division (or such division as assumes the powers thereof at any time), of Iberdrola, S.A. In particular, it shall take into account the guidelines and protocols for human capital management and promotion that may be prepared by the Human Resources Division (or such division as assumes the powers thereof at any time) of Iberdrola, S.A. establishing the general principles that inform the rules that the companies of the Iberdrola Group (including Avangrid) approve in this area within their respective scope of autonomy.