

# Equal Opportunity 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 *Equal Opportunity 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 *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 *Sustainable Human Capital Management and Anti-Harassment Policy* approved by the Board of Directors from time to time.

## 1. Scope of Application

This Policy applies to the Avangrid 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 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 equal opportunity contained in this Policy.

## 2. Purpose

The employees of the Avangrid Group represent a talented workforce. The Board of Directors believes that employment relationships based on equal opportunity, non-discrimination, and respect are critical to sustainable development and our success. This Policy articulates Avangrid’s commitment to the principle of equal employment opportunity for all applicants and employees and to providing applicants and employees with a work environment free from discrimination and harassment.

## 3. Main Principles of Conduct

- a) Avangrid is committed to maintaining a work environment free from all forms of unlawful discrimination and harassment.
- b) 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.

- c) Avangrid recruits, hires, trains and promotes into all job levels employees and applicants for employment without regard to 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.
- d) All other personnel programs such as compensation, benefits, transfers, layoff, return from layoff, training, education, tuition assistance, and social and recreational programs are administered without regard to 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.
- e) Avangrid is committed to implementing measures to help employees balance their responsibilities at work and their personal and family responsibilities and appropriate digital disconnection from work responsibilities including, but not limited to, measures intended to foster respect for personal and family responsibilities and, when possible, avoiding professional communications outside of working hours.
- f) Avangrid Group suppliers shall not discriminate 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. Avangrid will consider suppliers' internal policies and practices with respect to equal opportunity and work-life balance as part of the selection and engagement process.
- g) Avangrid will collaborate with educational institutions to encourage equal opportunity of all individuals in the workforce and training programs.
- h) 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.
- i) 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.
- j) Avangrid will facilitate mobility and collaboration of all employees within the Iberdrola Group to create networks of contacts and teams that share knowledge and best practices and promote equal opportunity.
- k) Avangrid will ensure that the artificial intelligence systems used in the selection, hiring, management of employee relations, training and promotion of professionals, as applicable, are developed and used in a way that promotes equal opportunity and discourages unlawful discrimination, and provides for adequate tracking and transparency ensuring that users are aware they are communicating or interacting with an artificial intelligence system to the extent required by, and in accordance with, applicable law.

### **3. Implementation and Monitoring.**

The Board of Directors assisted by the People and Organization Division and the Talent, Innovation and Equal Opportunity Divisions of Avangrid (or such divisions as assumes the respective powers thereof at any time), will oversee 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.