



Human Resources Policy

<u>Procedure Number:</u>	<u>Subject:</u>	<u>Applicability:</u>	<u>Revision Date:</u>	<u>Pages:</u>
1-05	<i>Sexual Harassment-Prevention Policy</i>	<i>All Employees</i>	<i>July 22, 2020</i>	7

AVANGRID's vision is to be a leader in the energy sector, providing reliable service to our customers while contributing to the well-being of our communities, shareholders and employees. Fulfilling this vision requires an uncompromising commitment to ethical business conduct and to complying with all applicable laws and regulations. This commitment must be shared by all employees. Thus, all of us are responsible for complying with the laws, regulations and policies that affect our daily work and holding ourselves to the highest standards in how we deal with our customers, regulators and co-workers.

Many of the principles underlying this commitment are set forth in the AVANGRID Code of Business Conduct and Ethics.

The Company is committed to providing a respectful, work environment free from sexual harassment. This policy applies to all employees, paid or unpaid interns, and non-employees and all must follow and uphold this policy.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, cause the recipient discomfort or humiliation, or interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other



terms, conditions or privileges of employment. This is also called “quid pro quo” harassment.

Any employee who feels harassed should make a report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Examples of Sexual Harassment

The following describes some examples of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical assaults of a sexual nature, such as:
 - Unwanted touching, pinching, patting, grabbing, brushing against another employee’s body or poking another employee’s body;
 - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the victim’s job performance evaluation, a promotion or other job benefits or detriments;
 - Subtle or obvious pressure for unwelcome sexual activities.
- Repeatedly asking a person to socialize during off-duty hours when the person has said no or has indicated he or she is not interested (supervisors in particular should be careful not to pressure their employees to socialize);
- Sexually oriented gestures, noises, remarks, jokes or comments (written or verbal) about a person’s sexuality or sexual experience, that create a hostile work environment.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual’s sex, sexual orientation, gender identity or the status of being transgender, such as:
 - Interfering with, destroying or damaging a person’s workstation, tools or equipment, or otherwise interfering with the individual’s ability to perform the job;
 - Sabotaging an individual’s work;
 - Bullying, yelling, name-calling.



Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

Where can sexual harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Other Types of Harassment

While the above examples discuss sexual harassment, this policy prohibits harassment based on any protected characteristic, including race, color, national origin, sexual orientation, military status, disability, religion, age, gender identity, genetic history, veteran status, or other status protected by federal, state, or local laws. Please refer to the Anti-Harassment and Discrimination-Free Workplace, Procedure Number 1-04.

Reporting Opportunities

The Company cannot be expected to effectively prevent or remedy sexual harassment unless it knows about the conduct. Employees, interns, applicants, or others who conduct business with the Company and are subjected to, witness, or otherwise become aware of possible sexual harassment must immediately report it to a supervisor, a Human Resources representative, the compliance officer, or to the Company's Ethics Helpline (which allows for anonymous reporting). The Ethics Line is accessible online, <https://secure.ethicspoint.com/domain/media/en/gui/54974/index.html> or by phone (877) 606-9171. Employees are not required to report to their immediate supervisor.

Employees may also report possible sexual harassment to:

Peter Church, Chief Human Resources Officer
180 Marsh Hill Road, 3rd Floor, Orange, CT 06477

Employees may complete a complaint form which is attached to this Policy and located on the Company intranet, under the human resources policies and procedures section. Employees may also report discrimination or harassment to the U.S. Equal Employment Opportunity Commission (EEOC) or their State human rights agency.

All complaints or information about suspected sexual harassment are investigated promptly and thoroughly. Investigations are conducted in a timely manner, are confidential to the extent possible, and conducted in a fair and impartial manner. Investigations will vary from case to case but may include interviews with those involved, review of relevant documents, and issuance of appropriate corrective action. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.



If you believe you are a victim of retaliation, you should report that promptly through one of the channels listed above.

Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior, or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to a Human Resources Representative or the compliance officer.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any form of retaliation against a complainant, witness, or participant in an investigation.

Retaliation Prohibited

No person shall be subject to adverse action based on a good faith complaint or report of sexual harassment, providing information, or otherwise assisting in any investigation of a sexual harassment complaint. Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action includes discipline or discharge, but need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours). Such retaliation is unlawful under federal, state, and (where applicable) local law.

The Company will not tolerate retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of the Company who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees, paid or unpaid interns, and non-employees working in the workplace who believe they have been subject to such retaliation should inform a supervisor, Human Resources Representative, or the compliance officer. All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections and External Remedies.



Legal Protections and External Remedies

Sexual harassment is not only prohibited by the Company, it is also prohibited by federal law (Title VII of the 1964 Civil Rights Act), state law, and, where applicable, local law. In addition to the available internal reporting options, employees may also choose to pursue legal remedies with the following governmental entities:

- **United States Equal Employment Opportunity Commission (EEOC).** An individual can file a complaint with the EEOC anytime within 300 days from the last act of harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC may issue a Right to Sue letter permitting the individual to file a complaint in federal court. The EEOC does not hold hearings or award relief, but may take other action including conciliation and pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. An employee alleging discrimination at work can file a “Charge of Discrimination.” The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.
- **State human rights agencies.** Complaints may also be filed with the human rights agency in your state. Each state specifies the time period in which complaints of harassment must be filed. Please see the appendix for contact information for the agency in your state.
- **Local Protections.** Employees may contact the county, city or town in which they live to find out if such a law exists.
- **Local Police Department.** If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

Violations of this Policy

Employees who violate this policy - including supervisory and managerial employees who knowingly allow violations of this policy - will be subject to discipline, up to and including termination. The Company does not tolerate sexual harassment and takes prompt corrective action if violations occur. Complaints of sexual harassment are kept as confidential as possible and retaliation is strictly prohibited.

**Contractors doing business with the Company via a staffing agency and/or vendor agreement are also expected to comply with the principles of this policy unless the policies/terms of their employing agency or vendor agreement specifically dictate otherwise.*

Obtaining a Copy of this Policy

You may request a copy of this policy, the complaint form, or any other policy on the intranet by calling our HR Hub at 833-246-6347 (or short dial 50 5555) or via email at onehrhub@avangrid.com.



Appendix

This appendix lists some of the equal employment opportunity agencies in the primary states in which Avangrid conducts business that investigate and adjudicate harassment complaints. Other states may have their own state agencies.

- **California Department of Fair Employment and Housing**
Phone: (800) 884-1684
(800) 700-2320 (TTY)
Email: contact.center@dfeh.ca.gov
www.dfeh.ca.gov
- **Connecticut Commission on Human Rights and Opportunities**
450 Columbus Blvd Suite 2, Hartford CT 06103
Phone: (860) 541-3400
Phone: 1(800)477-5737
(860) 541-3459 (TTY)
www.ct.gov/chro/site/default.asp
- **Maine Human Rights Commission**
51 State House Station, Augusta, Maine 04333-0051
Phone: (207) 624-6290
Fax (207) 624-8729
Maine Relay 711 (TTY)
www.maine.gov/mhrc
- **Massachusetts Commission Against Discrimination**
1 Ashburton Place, Suite 601, Boston, MA 02108
Phone: (617) 994-6000
(617) 994-6196 (TTY)
Fax: (617) 994-6024
Email: mcad@mass.gov
www.mass.gov/orgs/massachusetts-commission-against-discrimination
- **New York State Division of Human Rights**
One Fordham Plaza, Fourth Floor, Bronx, New York 10458
Phone: (888) 392-3644
Phone: (718) 741-8400
www.dhr.ny.gov/complaint
- **Oregon Bureau of Labor and Industries, Civil Rights Division**
800 NE Oregon Street, Suite 1045, Portland, Oregon 97232
Phone: (971) 673-0764



Fax: (971) 673-0765
Email: crdemail@boli.state.or.us
www.oregon.gov/boli

- **Vermont Human Rights Commission**
14-16 Baldwin Street, Montpelier, VT 05633-6301
Phone: (802) 828-2480
Phone: (800) 416-2010
Fax: (802) 828-2481
Email: human.rights@vermont.gov
www.hrc.vermont.gov