

Introduction

At Eversource we value the relationships we have with our suppliers.

Eversource believes in doing business with suppliers that embrace and demonstrate high principles of ethical business behavior. We share the following core values with the intent of providing business standards for suppliers who desire to conduct business with us:

- Maintain and adhere to the highest ethical standards.
- Comply with all federal, state and local laws and regulations, as well as all company policies and procedures, including this Code.
- Embed safety in every aspect of work performed.
- Foster a diverse and inclusive work environment that ensures everyone is treated with respect and dignity.
- Avoid any and all conflicts of interest, as well as the appearance of such.
- Keep property, resources and information secure, including confidential and non-public Eversource shareholder, customer, and employee information.

Because we place such a high priority on ethical and legal conduct, we require all suppliers and the individuals they assign to support Eversource to read, understand, acknowledge and comply with our Supplier Code of Business Conduct. As an Eversource supplier, you are expected to apply these business standards in all dealings with, and on behalf of, Eversource. You will be fully responsible for ensuring that any employees, subcontractors, agents or other third parties that you employ in your work for Eversource, as permitted by your agreement with Eversource, act consistently with these business standards, as well as any requirements specified in Terms & Conditions.

Failure to conduct business in a manner that meets these standards could result in a termination of the supplier relationship.

Conducting Business with Eversource

Eversource requires all Suppliers to comply with the following business standards.

For purposes of this Supplier Code of Business Conduct, “suppliers” refers collectively to any business, company, corporation, person or other entity that sells, or seeks to sell or provide, any kind of goods or services to Eversource. This also includes the supplier’s employees, agents and other representatives that may also be referred to as vendors, contractors, subcontractors, contingent workers and/or their agents and employees.

General Compliance

Suppliers must conduct business in accordance with the highest ethical standards and with integrity, honesty, fairness, safety, respect, and in compliance with all applicable laws and regulations.

We expect and require that our suppliers demonstrate a serious commitment to the health and safety of their workers, treat their employees fairly and with respect, and operate in compliance with human rights laws, including those associated with equal employment opportunity and non-discrimination, child labor, forced or compulsory labor, working hours, wages and benefits, the right to collectively bargain, freedom of association, health and safety, and a harassment-free work environment.

Eversource will not knowingly use suppliers that:

- Supply unsafe products or services;
- Violate U.S., state, or international laws or regulations;
- Use child labor or forced labor;
- Use physical punishment to discipline employees even if it is allowed by local law.

All suppliers must follow all applicable wage and hour laws and regulations and provide a minimum living wage and maximum working hours. Anyone employed by or performing work, as defined by applicable state and federal wage and hour laws, for a supplier on behalf of Eversource must report and record all time worked accurately in accordance with established local procedure and must be compensated by the supplier for all such time as required by applicable state and federal wage and hour laws.

Insider Trading

Suppliers are prohibited by law and the Code from trading in securities of Eversource while in possession of material, non-public information about Eversource. Suppliers must not use confidential or other non-public information for personal benefit, or provide inside information to others. Suppliers are also prohibited from sharing such "insider" information with anyone outside the company unless expressly authorized by Eversource and only after appropriate nondisclosure and other arrangements to protect the information have been made with Eversource. In addition, if suppliers are aware of material, non-public information about any other company (including Eversource’s customers, suppliers, vendors or other business partners) obtained by virtue of interaction with Eversource, then the supplier may not buy or sell that company’s securities or engage in any other action to take advantage of that information, including passing that information on to others.

Antitrust and Fair Competition

Suppliers must conduct business in compliance with international, and U.S. federal and state antitrust and fair competition laws and avoid pricing discrimination and unfair trade practices. Suppliers are prohibited from conducting business in a manner that restricts open and fair competition.

Tax Evasion

Suppliers are prohibited from taking any action in the conduct of their business for, or on behalf of, Eversource to unlawfully evade payment of local, state and federal taxes required by law.

Conflict of Interest

Eversource suppliers must not enter into a financial or any other relationships with an Eversource employee that creates any actual, potential or perceived conflict of interest. A conflict of interest is an activity or interest that is inconsistent with or opposed to the best interests of Eversource and may arise when a supplier takes actions or has ownership interests that influence the ability to perform his or her work objectively and effectively on behalf of Eversource. Further, Eversource property and information should never be used for personal gain or for the benefit of a supplier's family or friends or anyone who may use the property or information for personal gain. Giving and receiving business gifts and entertainment can create a sense of obligation or appearance of favoritism. Such exchanges may also violate Eversource Policy or the law. Suppliers must not provide gifts, entertainment, or preferential personal treatment or services with the intent to, or that could, influence or create the appearance of influencing decision-making by Eversource employees, customers or business partners.

All such conflicts, or potential conflicts, must be disclosed to Eversource and corrected. Even the appearance of a conflict of interest can be damaging to Eversource and to the supplier, and must be disclosed and approved in advance by Eversource Procurement management and the Eversource Chief Compliance Officer (860.665.3495 or Duncan.mackay@eversource.com). To disclose any conflict of interest, contact the Procurement office at procurement@eversource.com or the Corporate Compliance Hotline at 855-832-5552 or www.eversource.ethicspoint.com.

Affiliate Businesses

Suppliers will comply with all laws and regulations, rules, and standards and codes of conduct governing utility interactions and transactions by and between affiliate companies to ensure that Eversource's actions do not discriminate in favor of or provide an unfair competitive advantage, preferential treatment or improper subsidy to its non-utility subsidiaries. Suppliers will refrain from exchanging, communicating or disclosing any competitively sensitive information between Eversource affiliates unless expressly authorized by Eversource. Questions about compliance with the affiliate transaction rules should be raised with the Eversource Chief Compliance Officer.

Political Contributions

As an Eversource supplier, you are not authorized to make any type of political contribution or donation on Eversource's behalf.

Unauthorized Lobbying

As an Eversource supplier, you are not authorized to engage in any type of lobbying or other similar representative efforts on Eversource's behalf with or before any international, federal, state or local government entity, official, body or representative without the express written consent of Eversource's Government Affairs Group.

Anti-Corruption/Anti-Bribery

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. The Foreign Corrupt Practices Act (FCPA) and other U.S. laws prohibit payment of any money or providing anything of value to a foreign or domestic official, political party (or official thereof), or any candidate for political office for the purposes of obtaining, retaining or directing of business. All Eversource employees, suppliers, agents or independent contractors acting on behalf of Eversource must strictly abide by these laws and may not offer or provide bribes or other improper payments, benefits or anything of value to obtain business or an unfair advantage for or on behalf of Eversource.

Suppliers must conduct business with Eversource employees, customers and any government agencies without giving or accepting bribes, including (but not limited to), commercial bribes and kickbacks.

- Commercial bribery involves a situation where something of value is given to a current or prospective business partner with the intent of improperly obtaining business or influencing a business decision.
- Kickbacks are agreements to return a sum of money to another person or party in exchange for making or arranging a business transaction.

Suppliers must conduct their business in strict adherence to the Foreign Corrupt Practices Act, which regulates certain business transactions with foreign governments and their agents. Accordingly, Eversource suppliers are prohibited from making improper payments to, or for the benefit of, officials of foreign governments for or on behalf of Eversource. A payment is improper if it is given or promised with the intent of obtaining or retaining business, or it is given or promised to influence a foreign official to do something to benefit the company that he or she would not ordinarily do. All financial transactions with foreign governments must be reported clearly and completely, particularly transactions involving the expenditure of funds. Failure to properly report and account for any gift or expense incurred to benefit a foreign official may subject the supplier to civil or criminal penalties and termination of the supplier relationship.

Protecting Eversource Assets

Company Assets

Suppliers are responsible for protecting the company's intellectual, physical and financial assets from loss, damage, misuse, theft, fraud or embezzlement. Eversource relies on suppliers' vigilance to protect some of its most valuable intangible assets, such as proprietary information, a good reputation and the trust of regulators and customers.

Antifraud

All suppliers' activities should be conducted with honesty and integrity. Suppliers are prohibited from engaging in theft, misappropriating money or property, deliberately misstating or changing accounting or financial statements and reports, or otherwise engaging in fraudulent activity. It is never acceptable to take any part in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. Participation in a fraud occurs any time that a supplier helps conceal, alter, falsify or omit material information in business records, for a supplier's or Eversource's benefit or at the direction of others.

Anti-Money Laundering

As an Eversource supplier, you are expected to commit to full compliance with anti-money laundering laws and to cooperate fully with the efforts of law enforcement agencies to prevent, detect and prosecute money laundering. Money laundering, the act of disguising the source of money generated through illegal activities so that it resembles legitimate income, is a serious crime often connected with drug trafficking, embezzlement or financing terrorism. Anti-money laundering laws require transparency of payments and the identity of all parties to transactions.

Computer Software and Electronic Communications

Suppliers may not improperly use or duplicate proprietary computer software or any other intellectual property. Suppliers who have legitimate access to such material are expected to ensure that it is not used improperly, as well as not obtained by individuals who have no business need for the material.

Eversource policy and/or federal, state and local laws prohibit suppliers from knowingly creating, transmitting, retrieving, printing, storing, accessing or attempting to access certain information using Eversource technology, including but not limited to inappropriate, offensive and/or sexually explicit websites.

Access to Eversource electronic systems is provided to suppliers solely for use in transacting business for or on behalf of Eversource.

Cyber Security

Eversource reserves the right, without notice, to monitor the use of its computer systems and information systems to ensure the integrity of the systems and to identify unauthorized use, access or release of company data and systems.

Suppliers are expected to safeguard Eversource system integrity and confidentiality by protecting passwords, taking precautions against intrusion by computer viruses from the internet, email, and unauthorized software, and by preventing unauthorized persons from obtaining access to Eversource systems. Additionally, suppliers are expected to comply with all provisions of software and other license agreements Eversource has with third parties.

Suppliers are expected to understand their responsibilities for cyber security by completing all required training and by exercising sound judgment when using Eversource systems including not clicking on unsolicited emails and attachments, using strong passwords and following all Eversource Information Technology (IT) Security policies and procedures.

Intellectual Property

Suppliers are expected to protect intellectual property assets and rights (including patents, trademarks, and other proprietary information relating to Eversource's operations or technologies) by limiting public discussion and dissemination except as required for business and with proper authorization from Eversource. Inventions and creative works developed in the course of supplier's work for or on behalf of, and in certain cases at the end of, a supplier's engagement with Eversource, are the sole property of Eversource unless otherwise agreed to in writing.

Records and Retention

All suppliers are expected to commit to maintain accurate company records and accounts to ensure legal and ethical business practices and to prevent fraudulent activities. All business records, including,

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among others, payroll, timecards, travel and expense reports, emails, accounting and financial data, operation, maintenance and testing records, maps, drawings, plans, and diagrams, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business must accurately reflect transactions and events and conform both to generally accepted accounting principles and to internal Eversource controls, and must be complete, accurate and reliable in all material respects. Further:

- No entry may be made in any record that intentionally hides or disguises the true nature of a transaction.
- All Eversource information related to a given subject is to be preserved when the supplier is notified of pending litigation or issued a “legal hold” order by Eversource.
- Except as required under a “legal hold” order, Eversource records are to be discarded in accordance with Eversource’s standard records retention schedule.
- Suppliers are prohibited from altering, removing or destroying Eversource documents or records in violation of Eversource policies, including specifically if covered by a legal hold.

Confidential, Proprietary and Nonpublic Information

Eversource relies on individuals to protect proprietary information and all other confidential information. Proprietary information is defined as information not in the public domain pertaining to company business—including financial, technical and commercial materials or data, whether it belongs to Eversource, its customers or suppliers. All proprietary information should be treated as confidential.

Suppliers are prohibited from sharing proprietary information, unless expressly authorized by Eversource and only after appropriate non-disclosure and other arrangements to protect the information have been made with Eversource. Likewise, confidential and personal information pertaining to Eversource customers, employees and shareholders (such as Social Security numbers and banking information) should only be accessed as required for Eversource business purposes, and with proper authorization from Eversource, and must be safeguarded to ensure their privacy and non-disclosure.

Eversource Work Environments

Safety

Eversource is committed to maintaining a safe workplace, managing its business and conducting operations in a manner that complies with applicable regulations and promotes safety for all individuals involved in its business, its customers, and the general public, and will only do business with suppliers that embrace and demonstrate the same commitment to and compliance with these safety expectations, and have a rating in ISNetworld deemed acceptable by Eversource. Each supplier is responsible for knowing and observing all safety rules, standards, procedures and practices applicable to specific job responsibilities and for taking appropriate measures to minimize safety risks to protect its employees and others, including Eversource customers and the public. All suppliers and contractors are expected to follow all safety rules, standards, procedures and practices, and cooperate with Eversource Safety personnel and state and federal officials who monitor and enforce safety rules, standards, procedures and practices. All suppliers and contractors must immediately report to the appropriate Eversource representative or Safety personnel all occupational accidents, injuries or illnesses, and report to the appropriate Eversource representative or Safety personnel and address any unsafe or hazardous activities or conditions.

Eversource Safety Contact Information: Thomas LeBlond, (860) 665-2643.

Suppliers are responsible for ensuring all workers are aware of, understand, and strictly follow all safety rules, standards, procedures and practices applicable to the work, have the appropriate training and personal protective equipment to perform the work safely and in compliance with safety rules, standards, procedures and practices.

Drugs and Alcohol

Eversource expects its suppliers and their employees will be physically and mentally fit to perform their jobs safely and reliably at all times. Suppliers must have and follow an adequate and legally compliant drug and alcohol policy that at a minimum prohibits the use (including being under the influence of), possession, distribution, sale or purchase of illegal drugs or controlled substances, including marijuana, alcohol, or certain legal or prescription drugs on Eversource property, in Eversource vehicles, or while performing work for, or on behalf of, Eversource. Additionally, such policy must prohibit driving a motor vehicle or operating equipment while under the influence of alcohol and/or drugs while on the job for, or on behalf of, Eversource

The off-duty use, possession, distribution, sale or purchase of illegal drugs, the abuse of legal drugs or controlled substances, and the misuse of alcohol is also strictly prohibited if it affects the supplier's work performance, jeopardizes the safety of others, including Eversource employees, customers, suppliers or the public, or undermines government and public confidence in Eversource or the supplier.

Workplace Violence

Any acts of verbal or physical intimidation, assaults or threats of violence against another person, including Eversource employees, customers, or the public, or the destruction of Eversource or personal property, are strictly prohibited. To preserve workplace safety and security, suppliers may not possess weapons, firearms, ammunition, explosives or other incendiary devices on Eversource property. Suppliers may not store a weapon in any Eversource vehicle, regardless of its location, or store a weapon in a personal vehicle while on Eversource property.

SEE SOMETHING, SAY SOMETHING In the event of an emergency, please call 911 and then call Eversource Corporate Security. Please report any suspicious activity, item or security concerns:

Corporate Security Office Location	Phone
Berlin, CT (available 24/7)	860-665-5900
Hartford, CT	860-728-4600
Windsor, CT	860-607-6100
Eastern MA – Westwood, MA	781-441-3979
Eversource Gas of Massachusetts	866-218-0530
Manchester, NH	603-634-2233
Aquarion Water	203-395-3205

Discrimination

Suppliers must provide fair treatment and equal employment opportunities for all candidates for employment irrespective of a candidate's race, color, religion, national origin, ancestry, sex, marital status, gender identity or expression, age, handicap (disability), sexual orientation, genetics, active military or veteran status, or other characteristic protected by local, state or federal law. All supplier job applicants for work on behalf of Eversource must be evaluated based on qualifications and demonstrated skills and achievements without regard to race, color, gender, national origin, age, religion, disability, veteran status, sexual orientation, marital status, ancestry or other protected classification.

Discriminatory Harassment including Sexual Harassment

Eversource is committed to a workplace that is free of all forms of discriminatory harassment, including sexual harassment, intimidation, and retaliation. Discriminatory harassment, including harassment on the basis of race, color, religion, ethnic or national origin, ancestry, sex, marital status, gender identity or expression, age, handicap (disability), sexual orientation, genetics, active military or veteran status, pregnancy or pregnancy-related conditions, or other characteristic protected by local, state or federal law is unlawful and will not be tolerated.

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that tends to create a hostile or offensive work environment is sexual harassment. Verbal, visual, or physical conduct of a sexual nature is not acceptable in the workplace and may be determined to be sexual harassment. Sexual harassment is unlawful and will not be tolerated.

Retaliation against an individual who has made a complaint concerning discrimination, discriminatory harassment, including sexual harassment, or against individuals cooperating with an investigation of a discrimination or harassment complaint, is also unlawful and will not be tolerated.

Diversity and Inclusion

Eversource is committed to:

- Creating an inclusive workplace where all employees, customers and stakeholders are respected and valued.
- Leveraging the talent, unique perspectives, cultural and life experiences of every employee to ensure continued success.
- Attracting, developing and retaining a diverse workforce that:
 - Can work together to meet the changing needs of the customers we serve, and

- Deliver reliable energy and superior customer service.

Eversource seeks to do business with suppliers that create an inclusive environment where diverse ideas are communicated openly, directly and honestly; where every individual is a respected and valued contributor; and where differences are welcomed, understood and drawn upon to support all aspects of its business. Eversource expects all suppliers to actively work to develop and retain a diverse and inclusive workforce and be committed to diversity with respect to their own suppliers.

Environmental Regulation

Eversource is environmentally responsible in all business decisions and operations, and all suppliers are expected to adhere to, and must ensure all workers are aware of, understand, and strictly follow, the letter and spirit of environmental protection laws and Eversource policies and procedures. Suppliers must be committed to environmental compliance, stewardship, leadership and accountability. Suppliers must be environmentally responsible in all business decisions and operations for or on behalf of Eversource. Suppliers must ensure Eversource procedures are strictly followed with respect to the environment of the communities Eversource serves. All suppliers must also adhere to our Eversource Environmental Policy.

Sustainability

Eversource is committed to environmental stewardship and sustainability principles that guide how we develop and provide energy solutions for our customers in a manner that is good for people, protects our environment and rewards our shareholders. Within this framework we examine what we do – our operations, our supply chain and our product's end use – and seek better solutions to the economic, environmental and societal needs we face. Our suppliers must similarly work collaboratively in support of our sustainability objectives in the scope of their engagement, including responding to requests regarding related performance and management practices.

Eversource and Communities

Representing Eversource

Eversource is committed to provide accurate, consistent, and timely communication to employees, suppliers, customers, community and government officials, and the general public.

All suppliers who communicate with the public in the normal course of business, whether in the field or on the phone, should be friendly, polite, respectful, and mindful of their role as an Eversource company representative. Suppliers should always advance customer concerns for resolution if they can't resolve the issue on their own.

Eversource Corporate Relations organization is responsible for all public statements, news releases, internal and external publications and any graphic representations, including company logos and photos, issued by the company.

Any supplier who is contacted by a member of the media for an official company response should immediately notify the Media Relations organization within Corporate Relations. Media Relations will determine the appropriate company response, respond to media requests, and determine the appropriate company representative for media interviews, government, regulatory, and community meetings, discussions, or events.

Questions and Guidance

The Supplier Code of Business Conduct is not intended to be an all-inclusive catalog of compliance and ethical practices, but is rather a framework that describes Eversource's intent to mandate and guide ethical conduct for all suppliers conducting business with and on behalf of Eversource. No waivers of the provisions of the Supplier Code of Business Conduct may be granted without the review and approval of Eversource's Chief Compliance Officer.

Suppliers should direct questions concerning the Supplier Code of Business Conduct to their management, their Eversource business contact, the Eversource Procurement Department at procurement@eversource.com or the Eversource Chief Compliance Officer, 107 Selden Street, Berlin, CT 06037.

Reporting Supplier Code of Business Conduct Violations

Eversource expects its suppliers to follow the standards outlined in this code. All suppliers must promptly report any situation that they believe in good faith violates, any law, regulation, company policy, procedure, rule, or this Code to the Eversource Chief Compliance Officer.

Complaints, including anonymous filings may also be made through Eversource's Corporate Compliance Hotline at 855-832-5552 or www.eversource.ethicspoint.com.

Consequences for Violations

Failure to conduct business in a manner that meets the standards of this Code could result in removal of supplier employees from Eversource jobs or termination of the supplier relationship with Eversource. Under some circumstances, action may include referral to law enforcement authorities.

Retaliation

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Retaliation by anyone for any reason, regardless of level or position, against an individual who raises a compliance or ethics issue in good faith, or engages in any other activity protected by law will not be tolerated and may result in termination of the supplier relationship.
