	CONFLICT MINERALS POLICY	**English**
	Owner: Executive Vice President, General Counsel and Secretary	**Last Review:** 2026.06.25
	Department: Legal	

POLICY

Hubbell is committed to responsible sourcing and to conducting business in compliance with all applicable laws and regulations governing conflict minerals, including Section 1502 of the U.S. Dodd-Frank Act, and related rules of the U.S. Securities and Exchange Commission. Hubbell maintains a Conflict Minerals compliance program aligned with the Organisation for Economic Co-operation and Development ("OECD") to identify, assess, and mitigate supply chain risks.

SCOPE

This Policy applies to Hubbell Incorporated and its subsidiaries, divisions, and affiliates (collectively the "Company" or "Hubbell") employees, contractors, and third parties acting on the Company's behalf. It covers all materials, components, and finished goods that may contain Conflict Minerals. This Policy extends to all suppliers providing goods or services that include Conflict Minerals.

PURPOSE

The purpose of this Policy is to establish Hubbell's process for ensuring compliance with Section 1502 of the U.S. Dodd-Frank Act regarding Conflict Minerals and related U.S. Securities and Exchange Commission ("SEC") rules and regulations. This Policy defines Hubbell's approach to identifying, assessing, and mitigating risks associated with the sourcing of Conflict Minerals.

PROCEDURE

Hubbell will perform an annual process to determine whether its products contain Conflict Minerals and to assess the origin of such Conflict Minerals. Hubbell Trade Compliance ("HTC") will conduct this analysis through a solicitation of direct material suppliers and suppliers with whom Hubbell contracts to manufacture (collectively referred to as "Suppliers").

HTC will identify the Suppliers by reviewing the prior calendar year material transaction data. Hubbell relies on its Suppliers to provide information about the origin of Conflict Minerals within the supply chain. Suppliers will be sent a request to determine and declare the status of the supplied materials with respect to the Act and the Hubbell Conflict Minerals Policy. The request will be in the form of an industry standardized template. Supplier responses then will be catalogued by HTC and maintained pursuant to LEG-10, the Records Management Policy. Supplier responses will determine Hubbell's declaration status, per the requirements of the Act. Hubbell will annually file a Specialized Disclosure Report on Form SD ("Form SD") (as required by the Act) with the SEC.

ADMINISTRATION

Roles and Responsibilities. Hubbell's Legal team is responsible for governance and oversight of the Conflict Minerals Policy.

Monitoring, Evaluation and Review. This Policy will be reviewed annually.

Exceptions. None.

ACCOUNTING AND DISCLOSURE

Hubbell is required by the U.S. Dodd-Frank Act to make an annual SEC filing (a Form SD).

REPORTING

None.

DEFINITIONS

Act shall mean the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Conflict Minerals shall mean cassiterite (i.e., tin); columbite-tantalite (coltan) (i.e., tantalum); gold; and wolframite (i.e., tungsten) or their derivatives that are mined from the DRC and adjoining countries. This collection of materials could expand to include other minerals, or their derivatives as determined by the U.S. Secretary of State. The collection of conflict minerals at the inception of the Act are commonly called "3TG."

DRC shall mean the Democratic Republic of the Congo.

Form SD shall mean Specialized Disclosure Report on Form SD.

OECD shall mean the Organisation for Economic Co-operation and Development.

SEC shall mean the United States Securities and Exchange Commission.

Suppliers shall mean direct material suppliers and suppliers with whom Hubbell contracts to manufacture.