

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

Hubbell Incorporated (“Hubbell”) is committed to ethical and responsible conduct in all of its operations and to respecting the rights of individuals around the globe. To that end, currently Hubbell:

- Requires, as part of its verification process before engaging potential suppliers, that all suppliers enter into a supply agreement or be bound by a purchase order that obligates the adoption of a code of business ethics, requiring compliance with all applicable laws and regulations. Such applicable laws include, without limitation, prohibiting the use of illegal child or forced labor and any other form of human trafficking or slavery.
- Reserves the right in its supply agreements to commission independent audits of its suppliers and further reserves the right in its supplier codes of conduct to audit suppliers itself or through the use of third parties (on either an announced or unannounced basis).
- Requires its direct suppliers, pursuant to Hubbell’s supply agreements, to comply with all applicable laws.
- Maintains internal accountability standards and procedures. In addition, a number of Hubbell subsidiaries have adopted a Supplier Code of Conduct for its suppliers; requiring such suppliers to certify their compliance with the Code of Conduct. We anticipate that the entire organization will implement a similar code sometime in the near future.
- Requires employees to annually complete a Code of Ethics program that, among other things, mandates employees to act ethically and in compliance with applicable laws, regulations and company policies. Employees must certify their compliance with Hubbell’s Code of Ethics on an annual basis. Hubbell plans to provide specified training to procurement personnel regarding human trafficking and slavery, particularly with respect to recognizing and mitigating such risks within its supply chain products.

Hubbell does not conduct third party verifications or audits of its suppliers at this time. Hubbell does expect its suppliers to adopt sound human rights practices and to treat workers fairly and with dignity and respect, provide a safe and healthy work environment for their workers, conduct business in compliance with applicable environmental and employment laws, maintain accurate books and records as they relate to any labor or services for Hubbell, refrain from corrupt practices, and comply with all other applicable laws and regulations. Hubbell recognizes the importance of eradicating human trafficking and forced labor and, as part of an on-going process, is evaluating additional ways it can hold its suppliers to the standard of excellence that it maintains for itself.