



Third-Party Code of Business Conduct and Ethics

Introduction

Hubbell Incorporated and each of its business units and subsidiaries (collectively, “Hubbell”) is committed to conducting business in an ethical and legal manner as set forth in our own Code of Business Conduct and Ethics (a copy of which can be found on our website at Hubbell.com). We insist that our third parties maintain the same standards that we do, with the same focus on ethics, integrity, the environment, and social responsibility that we value. Hubbell’s third parties are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics and behavior.

Hubbell’s Third-Party Code of Business Conduct and Ethics (“Third-Party Code”) describes the minimum standards of ethical and responsible conduct required for our third parties. Hubbell’s third parties include, without limitation, suppliers, vendors, sales agents, distributors, subcontractors and any other third parties that work for or with Hubbell. All third parties are expected to inform and educate their employees, officers, directors, agents and subcontractors about this Third-Party Code. Any Third Party providing or receiving a service or product to or from Hubbell is subject to this Third-Party Code. Failure to follow any of the provisions of this Third-Party Code can result in termination of any and all agreements with Hubbell.

Third parties are also expected to be familiar with the business practices of their own suppliers, agents, subcontractors and other third parties, and to ensure that these entities also operate within the guidelines of Hubbell’s Third-Party Code.



Compliance with Laws and Regulations

All third parties must comply with all applicable laws, codes and regulations in the jurisdictions in which they operate. This includes, but is not limited to, laws and regulations relating to environmental and occupational health and safety, security, trade law compliance, labor practices, anti-money laundering, competition, corruption, and data privacy and protection.

Code Compliance

Hubbell reserves the right to periodically review any third party’s compliance with this Third-Party Code, including by conducting audits and other reviews of any third party’s environmental, supply chain, labor practices, and other business practices described in this Third-Party Code. You will permit Hubbell and/or its representatives the necessary access needed to evaluate your compliance with this Third-Party Code, including, without limitation, access to your facilities or your sub-contractor’s facilities and a review of associated books and records. Upon request, you must also provide Hubbell with written certifications evidencing your compliance with this Third-Party Code.

Ethics and Standards of Conduct

Business Integrity

Any and all forms of illegal or inappropriate activity by a Hubbell third party, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited and may result in termination of any or all agreements with Hubbell.



Hubbell's third parties are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics.

Confidential Information

Hubbell's third parties must protect any confidential or proprietary information that belongs to Hubbell or any other third party with whom Hubbell partners. This includes any non-public information that might be useful to Hubbell competitors or harmful to Hubbell if disclosed. Some examples of confidential or proprietary information include, but are not limited to:

- Intellectual property
- New product development ideas and processes
- Acquisition targets and/or plans
- Non-public financial information
- Corporate marketing strategies
- Customer, supplier and pricing information
- Trade secrets and patent information
- Business processes and systems
- Business objectives and strategies
- Personal information about any Hubbell employee or third party

Hubbell counts on its third parties both to carefully handle any personal information, such as identity, medical, employment and financial information, and to never collect, process, use, transfer or disclose personal information outside of a specified business purpose.

To the extent it is necessary for a Hubbell third-party to share Hubbell's confidential information with a sub-contractor, Hubbell expects the third party to implement adequate controls at a level no less than those set forth in this Third-Party Code with such sub-contractor.

Conflicts of Interest

Third parties should avoid engaging in any activity that would conflict, interfere or even create the appearance of a conflict with their business with Hubbell. Third parties must disclose any potential conflicts to Hubbell in writing as soon they recognize them. Examples of potential conflicts include, but are not limited to:

- Providing or offering an ownership stake directly to a Hubbell employee or a Hubbell employee's family member
- Engaging a Hubbell employee in work outside of the scope of his or her Hubbell position
- Taking a business opportunity learned through the Hubbell relationship that otherwise could belong to Hubbell
- Providing others with information about business opportunities learned through the Hubbell relationship
- Providing gifts and entertainment in an attempt to improperly influence business decisions

Gifts and Entertainment

Hubbell expects its third parties to avoid being or even appearing to be improperly influenced by gifts and entertainment. Gifts and entertainment should be of nominal value, never in cash and consistent with local standards and customs.

Q: What if we've developed a good relationship with a Hubbell employee and would like to hire her for some outside work? Isn't that okay?

A: It could be a conflict of interest. Before you make any such arrangement, you must disclose it to Hubbell for review. We all must do our best to not only avoid conflicts of interest, but to also avoid arrangements that could appear to unduly influence decision-makers or otherwise create potential conflicts of interest.

You should disclose any potential conflicts to Hubbell as soon as you recognize them.



Labor Practices

Human Rights

Hubbell is committed to respecting the human rights of all individuals and recognizes the importance of promoting individual health and welfare, economic development and political stability, and preventing crimes and corruption. Hubbell follows all laws and regulations governing its employment practices and acceptable treatment of employees, and Hubbell expects its third parties to follow the same standard. This includes laws prohibiting slavery, child labor, bonded labor, involuntary servitude and human trafficking, as well as regulations related to minimum working age, working hour restrictions, labor organizing, collective bargaining, workplace conditions and any other applicable labor standards.

Q: I work for a Hubbell third party. My supervisor acts in an abusive manner and addresses my co-workers with slurs. I have reported this behavior internally and nothing was done. Is there anything else I should do?

A: Yes. Third parties and their employees can make reports to Hubbell's independently managed reporting resource, Speak Up Today, on the web at www.SpeakUpToday.com or via telephone.



Respectful Workplace

We expect third parties to foster an environment where everyone is treated with respect and dignity, a workplace where employment-related decisions are based on performance and ability and never based on characteristics such as:

- Race or color
- Religion
- Age
- Gender
- Physical or mental disability
- Sexual orientation
- Gender identification or expression
- Citizenship, national origin or ethnicity
- Marital or family status
- Pregnancy or childbirth
- Veteran status
- Any other characteristic protected by applicable law

Hubbell also expects its third parties to maintain a workplace where no harassment of any kind is tolerated. Harassment includes, but is not limited to, unwanted physical contact; displaying, making or distributing offensive pictures, videos and spoken or written remarks; and any other unwelcome conduct that could create an intimidating or hostile workplace.

Q: We've hired a subcontractor to help us manufacture a product for Hubbell. Does that company have to abide by the same standards Hubbell is asking of us?

A: Yes. Any Hubbell third party who works with any other third parties, or subcontracts out any Hubbell-related business, must make sure that their own third parties conduct their business within the guidelines of this Code, just as Hubbell's third party should.

Inclusion

Hubbell seeks to include small and medium-sized third parties, where possible, and supports third parties that promote economic inclusion of vulnerable, marginalized or underrepresented social groups.

Responsible Sourcing and Conflict Minerals

Hubbell supports ending the violence and human rights violations, including forced and child labor, that are associated with the mining of certain minerals in high-risk conflict mineral locations. Specifically, we expect all third parties to comply with all applicable laws and regulations regarding extracting raw materials, including tin, tantalum, tungsten and gold. Hubbell encourages our third parties that manufacture components, parts or products containing conflict minerals to procure these materials from conflict-free sources.

Refer to *Hubbell's Conflict Minerals Policy* available on Hubbell's website (Hubbell.com) for more information.

Bribery and Competition

Bribery and Corruption

Hubbell expects third parties to conduct business transparently, honestly and fairly. To that end, third parties must abide by all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA). You must not attempt to influence others, directly or indirectly, through the offer, promise or payment of a bribe or anything else of value to gain or retain a business advantage, regardless of local law or custom. You must be careful to avoid even the appearance of such conduct and you must refrain from actions that could harm Hubbell's reputation in any way.

"Anything of value" means just that. Whether in the form of cash, gifts, entertainment, favors, charity or any other item or service, providing or offering anything of value to influence business decisions is against Hubbell policy.





Competition

Hubbell expects third parties to compete fairly and always comply with applicable competition and antitrust laws and regulations. Whether it's on Hubbell's behalf or not, you should not work with or agree to work with competitors to prevent or restrict free and fair competition. In negotiations with any other third party, you must never discuss or engage in price fixing, bid rigging, coordinating production, coordinating with others to restrict business, or allocating customers, markets or territories.

Trade Law Compliance

Trade Regulations

Third parties must abide by all applicable international trade laws and regulations, including import and export controls, sanctions and anti-boycott laws and regulations that could apply to the products, services or technology that are subject to the business they conduct with Hubbell. Exports can include the physical transfer of a product or the transfer of technology (e.g., electronic transfers, etc.).

Hubbell will not do business with third parties who do business with restricted or denied parties, including OFAC (U.S. Treasury Department's Office of Foreign Assets Control) specially designated nationals (SDNs) or sanctioned or blocked persons or entities, or who directly or indirectly source or manufacture any materials, components, subcomponents, or services for products from third parties located in any sanctioned country.

Hubbell also expects its third parties to effectively screen its vendors and suppliers to determine if they are denied parties or are located in any sanctioned countries.

Third parties must also learn and comply with any import regulations or laws, including the filing of related documentation and the payment of any duties or taxes.

Finally, third parties must not agree to any illegal boycott requests while working on Hubbell's behalf. Third parties may participate only in boycotts sanctioned by the United States government.

Money Laundering

Hubbell third parties must look for any signs of money laundering when conducting business with their own third parties. Money laundering is the illegal process of concealing the true origin of illicit funds through transactions that appear to be legitimate. Third parties are expected to be alert to red flags such as business partners who refuse to provide information about their identities or common transaction details, or who make unexplained changes to transactions. When red flags are noticed, third parties must take appropriate action to avoid money laundering activity.

Environmental Health and Safety

Environmental Compliance

Hubbell third parties must maintain a workplace that complies with all applicable laws and regulations, including any standards established by Hubbell, regarding operational and environmental responsibility, including the use, storage and disposal of any hazardous materials. Hubbell encourages its third-party partners to employ business processes that reduce the third party's adverse impact on the environment by minimizing waste and conserving natural resources.

Health and Safety

We expect third parties to foster a safe workplace for all. Third parties should address safety hazards, comply with all applicable laws and regulations, including any standards established by Hubbell, involving health and safety, and promote safe working habits.

No Third-Party Beneficiaries

This Third-Party Code does not confer, and shall not be deemed to confer, any rights on the part of any third party. No representative of any third-party or any other person shall have any rights against Hubbell by virtue of this Third-Party Code, nor shall such representatives or other persons have any rights to cause Hubbell to enforce any provisions of this Third-Party Code, such decisions being reserved by Hubbell in its sole discretion.

Data Privacy

Third parties must comply with all applicable data privacy laws in the jurisdictions where they operate, including complying with any reporting or disclosure requirements.

Communications and Reporting

To the extent permitted by law, Hubbell expects third parties to promptly notify Hubbell of any questions or concerns regarding the Third-Party Code, or if they become aware of a situation that violates, or appears to violate, Hubbell's Third-Party Code. Third parties and their employees may contact Hubbell's independently managed and anonymous reporting resource, **Speak Up Today**, on the web at www.SpeakUpToday.com, by email at SpeakUp@SpeakUpToday.com or by telephone at the numbers set forth herein, to report such concerns.

Hubbell policy prohibits retaliation against anyone reporting a concern in good faith and expects any third party to comply with same.





Speak Up Today Toll-Free Phone Numbers

COUNTRY	TOLL FREE #
United States and Canada	888-418-1667
Puerto Rico.....	888-418-1667
Australia.....	1-800-159-130
Belgium.....	0800-709-43
Brazil	0-800-591-7026
Chile	800-914-496
China.....	400-120-4958
India.....	000-800-100-4558
Ireland.....	1-800-947-201
Italy	800-791-932
Japan	0800-111-5517
Mexico	01-800-681-6510
Philippines.....	800-1-116-0928
Singapore	800-852-3432
Spain	900-838975
United Kingdom	0-800-014-8378



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