EVERSOURCE

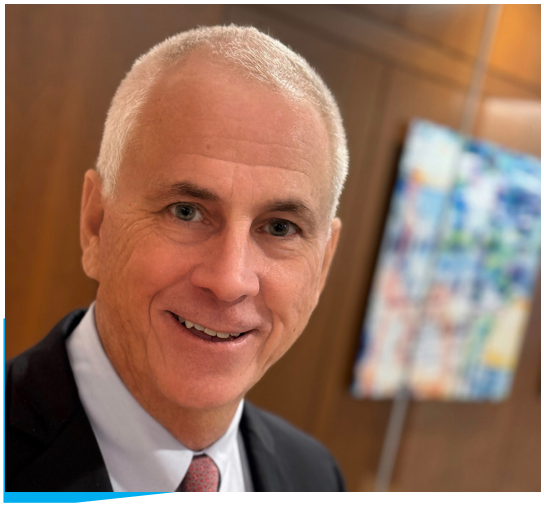
CODE OF BUSINESS CONDUCT



A message from Joe Nolan

Dear Colleagues:

We hold a significant responsibility to our customers, communities, shareholders, and other stakeholders to lead by example and drive positive change, always adhering to the highest ethical, legal, social, and environmental standards.
While our foundational responsibilities as a utility—delivering safe, reliable service and exceptional customer service—are central, our impact reaches far beyond these core services. Eversource is a committed steward of the environment, a catalyst for clean energy innovation, and a proactive participant in fostering a workplace culture of respect, integrity, engagement, and collaboration. We strive to maintain a work environment where all employees feel valued, respected, and empowered to contribute to our collective success.



Our continued excellence is guided by our Code of Business Conduct, which outlines clear standards for our operations. This document acts as our ethical compass, influencing every decision and action we take. It affirms our commitment to safety, honesty, responsibility, and ethical behavior.

Key areas highlighted in our Code of Business Conduct include:

- Vigilance around cybersecurity and data privacy, recognizing ongoing threats from cybercriminals and data thieves.
- Ensuring our business decisions reflect our unwavering commitment to integrity and the best interests of our customers, shareholders, and fellow employees.
- Encouraging employees to confidently report any questionable practices or unsafe conditions—if you see something concerning, speak up!

Compliance, integrity, and respect are integral to each employee's role. I remain personally dedicated to upholding these high standards daily. I encourage you to join me by regularly reviewing our Code of Business Conduct, familiarizing yourself with the guidelines relevant to your role, and speaking out whenever you observe situations that fall short of our shared commitment to integrity, honesty, accountability, and mutual respect

Thank you for your ongoing dedication and the difference you make for our customers and communities.



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Purpose

Eversource is built upon a foundation of strong ethical corporate values and business practices. Our Code of Business Conduct serves as an important resource for employees in support of day-to-day decision-making in our relationships with customers, suppliers, regulators, shareholders and each other. Our Code of Business Conduct is designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies, including, but not limited to, the Securities and Exchange Commission, and in our other public communications;
- Compliance with applicable laws, rules, and regulations;
- The prompt internal reporting of violations of this Code; and,
- Accountability for adherence to this Code.

The Code of Business Conduct should help guide our conduct in the course of our business; however, many of the principles described in the Code are general in nature, and the Code does not cover every situation that may arise. Accordingly, we need to use common sense and good judgment in applying the Code of Business Conduct, and if we have any questions about applying the Code, it is our responsibility to seek guidance.

We should consult applicable policies and procedures in specific areas as they apply, and always:

- 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 the Code;
- Embed safety in every aspect of our work;
- Foster an engaging, collaborative and collegial work environment that ensures everyone is treated with respect and dignity;
- Avoid any and all conflicts of interest, and the appearance of such; and
- Keep property, resources and information secure, including non-public customer, shareholder and employee information.

Scope

The Code of Business Conduct applies to all officers and employees of the company, as well as to the Eversource Board of Trustees. The same high ethical standards apply to all, regardless of job or level in the organization, and it is everyone's responsibility to be familiar with the Code and all policies and procedures applicable to our job functions.

Employee Responsibilities

As Eversource employees, we are expected to comply with both the letter and the spirit of the law, company policies, and the Code of Business Conduct. This means we must understand and comply with all policies, laws and regulations that apply to our jobs, even if we feel pressured to do otherwise. Our Code also requires us to seek guidance if we have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of our employment.



Periodically, we may be asked to provide a written certification that we have reviewed and understand the Code of Business Conduct, that we comply with its standards, and that we are not personally aware of any violations of the Code by ourselves or others. This certification is our pledge to live up to the Code and its expectations and to promptly raise concerns about any situation that we think may violate the Code. **Employees who violate our Code put themselves, fellow employees and our company at risk and may be subject to disciplinary action, up to and including termination of employment.**

Management Responsibilities

All Eversource leaders must show a commitment to our values through their actions. We also must promote an environment where compliance is expected and ethical behavior is the norm. All employees must act consistently with the company's values and principles. **No one should ask employees to break the law, or act in any way that is not consistent with the company's values, policies and procedures. Leaders must act promptly to address any potential conduct inconsistent with our values, policies and procedures.**

Guidelines for Ethical Decision-Making

When faced with an ethical dilemma, you have a responsibility to take the right action that complies with the law and company values.

What is ethical decision-making?

In business, ethical decision-making means acting in accordance with the law and company values no matter how strong the business, commercial, or other pressure to act in another way. Of course, even after recognizing the importance of an ethical corporate culture, you may not always be certain of how to act with integrity, so please use this simple chart to help determine the most appropriate way to proceed.

Ask Yourself	**If you aren't sure, then...** →	**If the answer is no, then...** →	**If the answer is yes, then...**
Is it legal? **Does it comply with the CBC or company policy?** **Is it consistent with company values and culture?**	**Contact your manager, Legal, Compliance or HR to seek guidance**	**Don't do it – the action can have serious consequences**	**The action appears appropriate**
Could this hurt the company's reputation? **Would I feel concerned if this appeared as a news headline?**	**Contact your manager, Legal, Compliance or HR to seek guidance**	**The action appears appropriate**	**Don't do it – the action can have serious consequences**
Would I or those around me be proud of this action?	**Contact your manager, Legal, Compliance or HR to seek guidance**	**Don't do it – such perceptions should cause us to reconsider our action**	**The action appears appropriate**

Contact Information for Reporting Channels or Questions

EVERSOURCE COMPLIANCE HOTLINE

855.832.5552

eversource.ethicspoint.com

The Compliance Hotlines are operated 24 hours a day, 7 days a week, by an independent third-party service provider, NAVEX Global.

Aquarion employees may also contact the

COMPLIANCE AND ETHICS HELP LINE

888.278.1506

SCAN CODE BELOW

If you think that an actual or possible violation of law, policy, or procedure has occurred or have a question about such things, it's important to report your concerns immediately to your supervisor or manager. Alternatively, you may contact other resources in the Company, such as the Human Resources department (through HR Connect), the Chief Compliance Officer, or an attorney in our Legal department. You are encouraged to identify yourself when reporting a possible violation and the Company will take steps to ensure that no retaliation occurs. You may, however, always report a suspected violation (even anonymously) by contacting the Company's Compliance Hotline. Whatever reporting channel you use, it is important to **say something if you see something**!

HR Connect
800.841.8684

Chief Compliance Officer
Duncan R. MacKay
860.665.3495
Duncan.mackay@eversource.com

Compliance & Me intranet site:
https://eversourceenergy.sharepoint.com/sites/Compliance

Conducting Our Business



General Compliance

As employees, it is important that we are aware of, and never intentionally violate, relevant laws, regulations, policies or this Code. To do so, or to encourage others to do so, exposes Eversource to risk, including the risk of civil and criminal penalties and the risk to its reputation, and therefore may result in disciplinary action up to and including termination of employment.

Employees should:

- Understand that violations of laws or regulations may also result in formal legal proceedings, and penalties including individual civil and criminal penalties.
- Remain alert to changes in the law or new requirements that may affect specific business units.

We must remember to always conduct business fairly, ethically, honestly, responsibly, and in compliance with all applicable laws and regulations and in accordance with the highest industry standards.



Insider Trading

Employees, officers and trustees who, as a result of their relationship with Eversource, have material non public information about Eversource or other public companies, including our suppliers and customers, are prohibited by law and company policy from trading in securities of Eversource or such other companies. In addition, such parties are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell stock or other securities of Eversource or any other public company on the basis of material, nonpublic information.

Employees must not use confidential information for personal benefit, trade securities based on material inside information, or provide inside information to others. Nonofficer employees may generally purchase and sell Eversource shares or transfer shares when not in possession of material inside information. Employees must consult with the Legal department if they are unsure whether they have material inside information at any point in time. Individuals who violate insider trading laws may face serious fines and criminal penalties, as well as disciplinary action by the company, up to and including termination of employment.



Antitrust and Fair Competition

Examples of possible violations of antitrust or fair competition laws include discussing or making an agreement with a competitor regarding:

- Prices or pricing strategy;
- Discounts;
- Terms of our customer relationships;
- Sales policies;
- Marketing plans;
- Customer selection;
- Allocating customers or market areas;
- Hiring of, or agreeing not to hire, employees; or
- Contract terms and contracting strategies.

Eversource supports free and open competition. We may not conduct business in a manner that restricts fair competition, and may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Employees must comply with international, and U.S. federal and state antitrust and fair competition laws, which prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace. Employees must be particularly careful when interacting with any employees, agents or representatives of companies that compete with Eversource and its affiliates. Employees should use care to avoid any improper discussions with our competitors, especially at trade association meetings or other industry or trade events where competitors may interact.

Under no circumstances should you discuss customers, prospects, pricing, or other business terms with any employees, agents or representatives of our competitors.

Tax Evasion

Eversource pays local, state and federal taxes as required by law. Employees are prohibited from taking any action in the conduct of the company's business to evade taxes. No employee should knowingly assist another company or individual that Eversource has business dealings with to evade taxes.

Conflict of Interest

We will conduct our business in a manner that prevents a conflict of interest or the appearance of a conflict of interest. A conflict of interest is an activity or interest that is inconsistent with or opposed to the best interests of the company, and may arise when an employee, officer or trustee takes actions or has ownership interests that influence the ability to perform his or her work objectively and effectively. Further, Eversource property and information should never be used for personal gain or for the benefit of an employee's, officer's or trustee's family or friends or anyone who may use the property or information for personal gain.

Personal business, secondary employment, community involvement and professional obligations should never interfere with an employee's job responsibilities, including ERP responsibilities, impartiality, or objectivity, or discredit Eversource in any way.

Any potential transaction or relationship that reasonably could give rise to a conflict of interest or the appearance of a conflict of interest must be reported in advance to and approved by Human Resources and the Chief Compliance Officer. If there is a potential conflict of interest, the employee, officer or trustee must not enter into the transaction or relationship.

If you have any questions, problems or concerns regarding conflicts of interest, or if you are aware of a situation that might involve an actual or potential conflict of interest, you should promptly contact your supervisor, Human Resources or the Chief Compliance Officer.

Examples of Conflicts of Interest:

- **Financial Interest:** Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with Eversource.
- **Outside Employment**: Holding a second job that interferes with your ability to do your regular job.
- **Board Memberships**: Employing, consulting, or serving on the board of a competitor, customer, vendor, supplier, or other service provider.
- **Employment of Relatives and Friends**: Hiring a supplier, distributor, or other agent managed or owned by a relative or close friend.
- **Gifts and Entertainment**: Soliciting or accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, vendor, labor association or customer.

Affiliate Businesses and Transactions





Eversource 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 company operations do not discriminate in favor of or provide an unfair advantage, preferential treatment, or improper subsidy to Eversource's nonutility affiliates.

Eversource acknowledges the need to follow certain standards of conduct to ensure that:

- Competitive energy solicitations are conducted in a fair, transparent and competitive manner;
- All laws, regulations, rules, standards and codes of conduct relating to such solicitations are observed;
- All potential bidders are treated equally; no potential bidder receives preferential treatment or confidential, nonpublic information not available to other potential bidders enabling a bidder to gain an unfair competitive advantage; and
- The efforts of Eversource employees and representatives in the solicitation process do not create any actual or apparent conflict of interest.

Eversource seeks to avoid actual or apparent conflicts of interest with respect to competitive energy solicitation processes by and among those employees preparing competitive proposals for Eversource affiliates and subsidiaries and those who participate in the solicitation and evaluation of such competitive proposals.

Eversource employees and representatives must not share, exchange or disclose any confidential or competitively sensitive information with/to an affiliate or other Eversource employees or representatives participating in a competitive solicitation process, unless permitted and authorized to do so under the rules governing such process and necessary to conduct Eversource business. Such disclosures may only be made after appropriate nondisclosure agreements and/or other arrangements to protect the information have been made.

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, officers, 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.

Employees must conduct business with customers, suppliers 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.

Gifts and Entertainment

No gift, favor, or entertainment should be accepted or given if it tends to, or appears to, obligate the recipient, or if it might be perceived as an attempt to influence the recipient's fair judgment. In addition, unless an employee has supervisory approval an employee should not provide any gift or entertainment to customers, suppliers or others that he or she would not be able to accept from a customer, supplier, or other similar parties. Always use a "reasonableness" standard when considering the appropriateness of a gift or entertainment.

Our employees, officers, directors, family members, agents or agents' family members are prohibited from offering, accepting, or receiving a gift or entertainment if it:

- Is in cash, or a cash equivalent (e.g., a gift card);
- Is not consistent with customary business practices;
- Is of more than modest value (e.g., $50.00);
- Can be construed as a kickback, bribe or payoff in violation of any law, including a bribe to a government official in violation of the U.S. Foreign Corrupt Practices Act;
- Violates any other laws or regulations; or
- Could cause embarrassment to or discredit Eversource if disclosed.

Specific laws apply to interactions with government officials and employees. For example, the U.S. and other countries have strict laws that prevent providing anything of value, including food or beverages, to a government employee. When doing business with government agents, employees, or officials, check with the legal department to be sure we understand and follow applicable laws.

You should discuss with your supervisor or manager any questions or concerns you may have about the appropriateness of any gifts or entertainment.

Political Activity/Lobbying

Eversource encourages personal participation in the political process in a manner consistent with all applicable laws and company guidelines. We may not make or commit to political contributions on behalf of Eversource but may generally support the political process through personal contributions or by volunteering our personal time to the candidates or organizations of our choice. These activities, however, must not be conducted on company time or involve the use of any company resources, such as telephones, computers, or supplies. If an employee expresses a personal view in a public forum, such as a letter to a newspaper or on social media, they may not use Eversource letterhead, a company email address, or reference to a business address or title.

In addition, the following rules apply:

- The company will not reimburse employees for personal political activity.
- Personal political views or choice in political contributions will not affect employment, provided employees act in a respectful, non-offensive, nonthreatening manner.
- Company property or assets, including our time at work, should not be used to further personal political activities or interests.
- If an employee plans to seek or accept a public office, the employee must first discuss this decision with his or her supervisor and obtain prior approval from the Human Resources department to ensure there is no conflict of interest.
- There are specific laws and requirements that apply to Connecticut General Assembly members, candidates, and candidates-elect, to certain officers and employees of Eversource companies considered state contractors,and to lobbyists; accordingly, employees should contact the Legal department with any questions regarding these areas.

Protecting Our Assets



Fraud Prevention

Eversource has a robust Fraud Prevention Program that seeks management's input to identify key business areas where fraud could occur, in order to enhance internal controls and other measures to prevent or detect fraudulent activity.

The Code of Business Conduct sets forth the expectation that employees will report potential or suspected fraud or other noncompliance with law, our Eversource policies, procedures or processes, including questions about potentially unethical actions at the company.

Employees are prohibited from engaging in theft, misappropriating money or property, deliberately misstating 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 an employee helps conceal, alter, falsify or omit material information in our records, either for an employee's benefit or at the direction of others. Employees must refuse to engage in any questionable activities and must follow up on any suspicions of questionable activities with a supervisor, Human Resources, the Legal department, or the Chief Compliance Officer.

Company Assets

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

Anti-Money Laundering

Eversource is committed to full compliance with anti-money laundering laws and will conduct business only with reputable companies and individuals involved in legitimate business activities and transactions. Money laundering is a global problem with far-reaching and serious consequences.

What is Money Laundering?

- Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions.
- Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery and fraud. Involvement in such activities undermines a company's integrity, damages a company's reputation and may expose Eversource and individual employees and officers to severe sanctions and criminal penalties.
- Anti-money laundering laws require transparency of payments and the identity of all parties to transactions.

Eversource forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. The company takes affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Employees are expected to cooperate fully with the efforts of law enforcement agencies to prevent, detect and prosecute money laundering.

Computer Software and Electronic Communications

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

- Employees are prohibited from knowingly creating, transmitting, retrieving, printing, storing, accessing or attempting to access certain improper and/or inappropriate information using company technology—including, but not limited to, offensive and/or sexually explicit websites.
- Company electronic systems are provided to employees solely for use in transacting company business.
- Employees are expected to use company systems, such as email and access to the internet, for business-related reasons. Occasional personal use may be allowed with permission from a supervisor.



Cybersecurity

Employees are expected to safeguard system integrity and confidenti-ality 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 and data. Additionally, employees are expected to comply with all provisions of software and other license agreements with third parties. All Technology Systems and software including cloud technologies and Artificial Intelligence ("AI") must be reviewed and approved by the Information Technology and Information Security organizations and procured in compliance with our Procurement Policies.

Employees must demonstrate understanding of common responsibilities for cybersecurity by:

- completing all required training;
- exercising sound judgment when using company systems, including not clicking on unsolicited emails and attachments;
- using strong passwords; and
- following all IT Security policies and procedures. **https://eversourceenergy.sharepoint.com/sites/informationtechnology** or **860-665-HELP (665-4357)**

Eversource reserves the right, without notice, to monitor the use of company computer and information systems to ensure the integrity of the systems and to identify unauthorized use, access or release of company data and systems. Data is not to be shared to any unauthorized external parties.

Intellectual Property

Employees 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 may be required in the course of business and with proper authorization. Inventions and creative works employees develop in the course of employment at Eversource, and in certain cases, after leaving the company, are the sole and exclusive property of Eversource.

Company Records and Retention

Eversource is committed to maintaining accurate company records and accounts to ensure legal and ethical business practices and to prevent fraudulent activities. All business records, including, 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 company information related to a given subject is to be preserved when the company is notified of pending litigation or issued a "legal hold" order.
- Except as required under a "legal hold" order, Eversource records are to be discarded in accordance with Eversource's standard records retention schedule.
- No employee, officer or trustee may authorize or allow any other individual to alter, remove or destroy documents or records in violation of company policies.

Confidential, Proprietary and Nonpublic Information

Eversource relies on employees 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 the company, our customers or our suppliers. All proprietary information should be treated as confidential. Employees are prohibited from sharing proprietary information, unless warranted and necessary to conduct business. Employees must also not copy, save or store confidential information in non-Eversource approved third party or cloud/Artificial Intelligence sites without the approval of their Department Management and Information Security Organization.

Confidential information pertaining to our customers, employees and shareholders (such as Social Security numbers and banking information) should be accessed only as required for business purposes and with proper authorization and must be safeguarded to ensure its privacy and non-disclosure.

Procurement and Supplier Relationships

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

Eversource believes in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. The company relies on suppliers, contractors, and consultants to help accomplish our goals. They are part of the Eversource team and should be treated according to our values, and they must be confident that they will be treated in an ethical manner.

We offer fair opportunities for prospective third parties to compete for our business. The manner in which we select our suppliers and the character of the suppliers we select reflect on the way we conduct business. 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.

Procurement decisions are made on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, applicable sustainability criteria, and price.

Appropriate conduct in the procurement process includes:

- Using established corporate-wide or regional supply agreements
- Obtaining competitive bids when leveraged agreements do not exist
- Confirming the financial and legal status of the supplier
- Verifying quality and service claims on a regular basis
- Making sure agreements clearly state the services or products to be provided, the basis for earning payment and the applicable rate or fee
- Verifying invoices clearly and fairly represent the fair value of the goods and services provided
- Ensuring payments are made only to the person or the supplier that actually provides the goods or services
- Avoiding reciprocal agreements or exchange of favors

Respecting Employees and Work Environments



Safety

A safe workplace is a fundamental right of every person and a core business value.

- Eversource takes responsibility for maintaining a safe workplace by complying with applicable regulations and conducting operations in a manner that promotes safety for employees, customers, and the general public.
- In addition, the company partners with our contractors to help minimize safety risks for their employees and subcontract partners.
- Employees and contractors are expected to follow all safety rules and practices, cooperate with officials who enforce these rules and practices, take necessary steps to protect themselves and other coworkers, immediately report all occupational injuries/illnesses, and report and address unsafe or hazardous conditions.
- In the case of accidents that result in injury to oneself or a co-worker, regardless of how insignificant the injury may appear, employees must notify their supervisor immediately, and in no event later than the end of the shift during which the injury occurred.
- Such reports are necessary to comply with laws and to initiate insurance and workers' compensation benefits procedures.
- Employees who do not follow safety standards or rules, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment.





Culture & Engagement

Eversource seeks to create an environment where ideas are communicated openly, directly, and honestly; every employee is a respected and valued contributor; and differences are welcome, understood, and drawn upon to support all aspects of our business.

Eversource seeks to foster an engaging and respectful environment where a variety of ideas are communicated openly, directly and honestly; every employee is a respected and valued contributor; and differences are welcome, understood and drawn upon to support all aspects of our business. To accomplish this, Eversource actively works to develop and retain a high-performing workforce by hiring the most qualified individuals and providing opportunities for employee engagement and development that support career growth and innovation for all without regard to race, sex, national origin, age, disability or other protected characteristics. Additionally, Eversource is committed to making a positive difference within the many different communities we serve, and we expect the same commitment from our suppliers and vendors.

EVERSOURCE'S CULTURE AND ENGAGEMENT STATEMENT

We are committed to:

- **Fostering a 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 an engaged workforce that:**
  - **Works together to meet the changing needs of the customers we serve, and**
  - **Delivers reliable energy and superior customer service.**





Workplace Violence

Eversource will not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment, and/or coercion. Behavior that threatens the safety of people or property or has the potential to become violent, should be immediately reported to Security.

Any acts of physical intimidation, assaults, or threats of violence against an employee, customers, or the general public, or the destruction of company or personal property are strictly prohibited. To preserve employee safety and security, and to the extent consistent with state and local laws and not expressly authorized by the Executive Vice President & General Counsel and the Executive Vice President, Human Resources and Information Technology, weapons, firearms, ammunition, explosives, and incendiary devices are forbidden on company premises or in company vehicles, regardless of location, or in a personal vehicle while on company property.

If an employee feels a coworker is engaging in behavior that does not support a respectful workplace, is threatening or out of character for that person, employees need to address that behavior directly with the other employee or with their manager.

Employees should immediately report any concerns (harassment, threats, etc.) to Human Resources, Security (for threats of violence), or the Chief Compliance Officer.

SEE SOMETHING, SAY SOMETHING

In the event of an emergency, please call 911 and then call 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

Employment Discrimination



Eversource provides fair treatment and equal employment opportunities for all employees and candidates for employment irrespective of a candidate's or employee's race, color, religion, national origin, ancestry, sex, gender identity, age, handicap (disability), marital status, sexual orientation, genetics, active military or veteran status, or any other characteristic protected by local, state or federal law. Equal employment opportunities apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, termination, rates of pay or other forms of compensation and selection for training at all levels of employment. Eversource is committed to a workplace free of discrimination and to meeting our obligations under state and federal laws.

Equal employment opportunities apply to all employment actions, including, but not limited to, recruitment, hiring, upgrading, promotion, transfer, demotion, termination, rates of pay or other forms of compensation, and selection for training at all levels of employment without regard to race, sex, national origin, age, disability, or other protected characteristics.

Eversource:

- Complies with laws regarding employment of noncitizens and provides equal employment opportunity to everyone who is legally authorized to work in the United States
- Provides reasonable accommodations to qualified individuals with disabilities and removes any barriers to success
- Is committed to a workplace free of harassment, intimidation, retaliation and discrimination for our employees, customers, and suppliers.

Discriminatory Harassment, Including Sexual Harassment

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

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

Sexual harassment is a form of sex discrimination that is illegal under federal, state and local law. These laws provide that unwelcome sexual advances, requests for sexual favors and other physical or verbal conduct of a sexual nature constitute sexual harassment when:

- Submission to or rejection of such advances, requests, or conduct is explicitly or implicitly a term or condition of the employee's employment; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating, or sexually offensive work environment.

Verbal, visual, or physical conduct of a sexual nature is not acceptable in the workplace and may be determined to be sexual harassment.

Employees are responsible for creating a culture of trust, honesty and respect and promoting a positive work environment, and are expected to report suspected harassment, intimidation, retaliation and discrimination immediately to supervision or Human Resources. Eversource will never retaliate or tolerate any retaliation against anyone who raises a good faith belief that unlawful discrimination has occurred.

Human Rights and Fair Labor

We are committed to following all applicable wage and hour laws and regulations and providing a minimum living wage and maximum working hours. Anyone employed by or performing work for Eversource as defined by applicable state and federal wage and hour laws must report and record all time worked accurately in accordance with established local procedure and will be compensated for all such time.

Eversource adheres to all applicable labor and human rights laws including, but not limited to, those associated with equal employment opportunity and nondiscrimination, 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, and those additional human rights as reflected in the Eversource Human Rights Policy.

As described by the Human Rights Policy, Eversource does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working conditions, and supports the products and equipment we use to serve our customers being free of conflict materials.

We expect and require that our suppliers and direct contractors 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 the aforementioned Human Rights Policy.

Drugs and Alcohol

Employees must be physically and mentally fit to perform their jobs safely and reliably at all times. The use, possession, distribution, sale or purchase of drugs, including marijuana or alcohol, while on company property, or while acting in a company capacity, or during working hours, is strictly prohibited. Additionally, driving a vehicle under the influence of alcohol and/or drugs while on company business is also strictly prohibited. The off-duty use, possession, distribution, sale or purchase of illegal drugs, the abuse and misuse of legal drugs, controlled substances, and alcohol is strictly prohibited if it affects an employee's work performance.

Such activities adversely affect employee job performance, jeopardize the safety of co-workers, customers and the public, and undermine government and public confidence in the company.

Appreciating Our Customers and Communities



Representing the Company





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

- All employees 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 a company representative.
- Employees should always advance customer concerns for resolution if they cannot resolve the issue on their own.
- Corporate Relations 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 employee who is contacted by a member of the media or by an individual or organization requesting information for a media article 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.

Social Media

Eversource understands the importance of social computing, networking and social media. Social media sites like Facebook, LinkedIn, Instagram and Twitter are all very popular, but social media can also take other forms, such as blogs, wikis, file-sharing sites, forums, discussion groups, and chat rooms. Social media can be an extremely effective way of marketing Eversource and expanding our interactions with employees, vendors, and customers. It is expected that employees engage in social networking in a responsible and respectful manner. Company social media accounts are managed by the Social Media department within Media Relations. Social Media employees and other designated employees are the only employees permitted to respond to comments, questions and requests made on social media platforms. These guidelines supplement current company policies and must be complied with at all times.

Sustainability and Environmental Values



Eversource is committed to addressing climate change through dedicated mitigation and adaptation measures. This includes our goal to reduce our operational (Scopes 1 and 2) emissions 45% by 2035 and to achieve Net Zero emissions by 2050. Our long-term target addresses not only the operational emissions we have more control over, but also the Scope 3 emissions associated with our customers' energy use - the most significant and challenging portion of our GHG footprint.

One of the most important measures we can take to reduce our own emissions as well as support our states in their climate objectives is to prepare our business and customers in the transition to cleaner energy. We are also assessing the current and anticipated impacts of climate change on our company and taking steps to enhance the resiliency of our infrastructure that will help us to maintain safe and reliable services for our customers.

Eversource plays an important role in advancing affordable clean energy solutions for the region, such as award-winning energy efficiency programs, solar development, innovative battery storage projects, and electric vehicle charging infrastructure.

Eversource is committed to climate leadership, clean energy, accountability and stewardship.

Eversource is committed to doing this transformative work in a way that avoids or minimizes environmental impacts, addresses biodiversity, and promotes engagement in a manner that addresses the specific challenges and particular issues facing each of the communities we serve.

Environmentally responsible decisions are the expectation in all Eversource business activities and all employees are required to adhere to our Environmental Policy.

The letter and spirit of environmental protection laws and Eversource procedures are strictly followed with respect to the communities we serve.

Resolving Concerns and Reporting Code of Business Conduct Violations



Reporting Code of Business Conduct Violations

EVERSOURCE COMPLIANCE HOTLINE

855.832.5552

eversource.ethicspoint.com

The Compliance Hotlines are operated 24 hours a day, 7 days a week, by an independent third-party service provider, NAVEX Global.

Aquarion employees may also contact the

COMPLIANCE AND ETHICS HELP LINE

888.278.1506

SCAN CODE BELOW

You must report any situation that you reasonably and in good faith believe violates any law, regulation, company policy, procedure, or rule, or this Code. You should contact your supervisor or manager or other appropriate resource.

It is important that all known and potential violations are promptly reported. Silence is not acceptable, and the Eversource Compliance Hotline provides a way to report known and suspected violations anonymously if desired.

Nothing in the Code should be construed as excusing you from your own misconduct or protecting you from disciplinary action as a result of your self-reporting your own misconduct. However, the fact that you self-reported is important and will be taken into consideration in determining an appropriate response, including appropriate disciplinary action.

The company believes it is essential to create an environment in which employees may raise any matters of genuine concern internally without fear of disciplinary action, that employees will be taken seriously, and that the matters will be investigated appropriately and as far as practicable be kept confidential.

Retaliation against anyone who in good faith provides information or otherwise assists in an investigation is prohibited and will, in itself, be treated as a violation of our Code that may lead to discipline up to and including termination. The fact that an employee in good faith raises a concern or participates honestly in an investigation, cannot be the basis for any adverse employment action.

Investigations Process for Potential Code Violations

Eversource has established processes and procedures to ensure that all internal investigations are conducted by qualified personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly, and confidentially.

Employees involved in internal investigations will be treated with dignity and respect, and should:

- Cooperate fully and truthfully with investigators
- Maintain confidentiality as required and not discuss unless authorized to do so
- Promptly raise ethics and compliance questions or concerns
- Immediately report suspicious behavior

All investigations and any resulting corrective and/or disciplinary action will be conducted in compliance with federal, state and local law, applicable Eversource policies, and any required workers' representative consultation requirements.

Eversource may, in appropriate cases and subject to applicable local law, notify government authorities and cooperate with any resulting inquiry, investigation, prosecution, or other government action. In addition, when legally required or otherwise appropriate, Eversource will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by Eversource's General Counsel or his or her designees.

To help maintain confidentiality, employees should avoid discussing these issues, or any investigation, with other employees during the pendency of the investigation unless otherwise required by Federal or state law.

Questions and Guidance

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SCAN CODE BELOW

The 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 the company's intent to mandate and guide ethical conduct for all employees. No waivers of the provisions of the Code may be granted to employees without the review and approval of Eversource's Chief Compliance Officer. Additionally, consistent with New York Stock Exchange listing requirements, only Eversource's board of trustees or a committee of the board may waive a provision of the Code for executive officers or trustees, and any waiver will be promptly disclosed to the public.

If you have a question concerning the Code of Business Conduct, you should discuss it with your manager, Human Resources or the Chief Compliance Officer.

HR Connect
800.841.8684

Chief Compliance Officer
Duncan R. MacKay
860.665.3495
Duncan.mackay@eversource.com

Compliance & Me intranet site:
https://eversourceenergy.sharepoint.com/sites/Compliance

Please note: The Code is not a contract of employment; it does not promise or guarantee any particular benefits or specific actions, and it does not limit the Company's ability to take action with respect to employment status, wages and hours, or terms and conditions of employment. Further, it does not alter the "at will" employment status of any employee. Unless otherwise provided by a written contract of employment signed by an officer of the Company, or by an applicable collective bargaining agreement, all employees are employed "at will," which means that they may terminate their employment at any time and for any reason, and the Company may do the same.

EVERSOURCE