

Code of Conduct

Why do we need a code of conduct

Hitachi ABB Power Grids is a global leader in power technologies. Our company in its current form was created in 2018, but our history spans over 120 years. Since our inception, our reputation has been built on certain qualities and values, one of the most important of which is integrity.

A culture of integrity is a prerequisite for a world-class business. Many valuable customers choose to do business with us in part because they know Hitachi ABB Power Grids behaves in a responsible and ethical way, and that we respect the needs of individuals, society, and the environment.

The Code of Conduct defines how we conduct ourselves at Hitachi ABB Power Grids, and it has played a critical role in helping us earn our reputation. Every Hitachi ABB Power Grids employee, in every location, and at every level, including board members, directors, and officers alike, is bound to live up to the letter and the spirit of the Code, even if it means losing an important contract or missing a business target.

The Code of Conduct is more than an acknowledgment of the rules. It reflects a personal commitment to take responsibility for our actions and always to work with integrity.

At Hitachi ABB Power Grids, performance is measured not only by the results achieved, but also how these results were achieved. This is why our stakeholders can rely on the fact that our services, operations, and daily business are based on ethical behaviour.

Hitachi ABB Power Grids strives for a culture of mutual respect that encourages the exchange of views at all levels of the organization. By fostering open dialogue and playing an active role in our community, every Hitachi ABB Power Grids employee can make a difference.

Hitachi ABB Power Grids' strength and future success depends on its reputation as a trusted and reliable business partner. We all have a role to play in safeguarding that reputation. If you are ever in doubt about how to behave in any situation, please ask your manager, human resources representative, or local or regional head of integrity for guidance. Confidentiality and non-retaliation are our commitments to you.

I expect that you will take the time to read through the Code of Conduct and do your part to exemplify our high standard of integrity at Hitachi ABB Power Grids.

Claudio Facchin

CEO

Hitachi ABB Power Grids Ltd

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Determination

We show determination when we help our customers to succeed

The success of our customers is key to success of Hitachi ABB Power Grids. Customers look to Hitachi ABB Power Grids for innovation, reliability and integrity. The standards of behaviour required in our client relationships are designed to ensure that we consistently deliver those values and avoid mistakes that will harm our reputation.

We focus on quality

We strive to help our customers gain a competitive advantage by adding value through the performance and quality of our power and automation technologies and services.

We win trust by being honest

Trust is built through transparency and honesty. To be successful on a sustainable basis, we have to build each customer's trust through the integrity of our words and actions. We don't promise what we can't deliver, and strive to ensure that customers, shareholders and colleagues trust us to keep our word.

We compete fairly

We believe in a competitive, free enterprise system because it guarantees that our hard work and innovation will be rewarded. We will lose the trust of our customers if we treat them differently from one another or conspire with competitors against them.

This system, as the basis of a free market economy, is protected and promoted by competition law. Consequently, our actions must always comply with all applicable antitrust and other laws regulating competition.

While these laws vary from country to country, the Hitachi ABB Power Grids' minimum standard can be defined as follows:

- We compete openly and independently in every market. We do not make any agreements – formal or otherwise – with competitors to fix or set prices, or allocate products, markets, territories or customers.
- We do not obtain or share with competitors current or future information about price, profit margins or costs, bids, market share, distribution practices, terms of sales, specific customers or vendors.
- We do not agree with or require a customer to resell our products at certain prices.
- We do not act in a manner that unfairly favours or benefits one customer over another competing customer.

Be mindful of the antitrust risks presented by trade and professional association meetings. As a Hitachi ABB Power Grids employee you are required to:

- Attend only meetings of legitimate trade and professional associations held for proper business, scientific, or professional purposes.
- Discuss any questionable agenda items with your supervisor or with a member of Hitachi ABB Power Grids' legal and integrity function (Global Function – Legal & Integrity) before you attend the meeting.
- Leave the meeting and promptly advise your supervisor or Function – Legal & Integrity, if you observe any activity at an association meeting that appears to be illegal or suspicious.

If you have any questions regarding compliance with antitrust laws, contact Global Function – Legal & Integrity immediately.

We refuse to make improper payments

Hitachi ABB Power Grids' reputation for honesty and integrity must not be put at risk by the offer of improper payments. In dealing with public officials, political parties or their officials or any private sector worker, Hitachi ABB Power Grids employees must neither offer, promise or give any undue financial or other advantage, whether directly or through intermediaries, to obtain or retain business or any improper advantage in the conduct of business.

We protect our credibility by shunning gifts and favors

Accepting gifts and entertainment from business partners or offering such favours undermines our credibility. It makes Hitachi ABB Power Grids vulnerable to accusations that business decisions are influenced by factors other than merit.

Employees must therefore not offer, make, seek or accept gifts, payment, entertainment or services to or from actual or potential business partners which might reasonably be believed to influence business transactions, which are not within the bounds of customary business hospitality or which are prohibited by applicable law.

Responsibility

We show responsibility when we safeguard the company's assets

We are all part of the Hitachi ABB Power Grids team. Show respect and support for your colleagues and their aspirations by caring for the environment you and they work in, and the information systems, equipment and other facilities needed for each of us to do the best possible job. Helping each other to succeed also hinges on how we handle positions of authority, access to privileged information and potential conflicts of interest.

We are respectful of the company's assets

Hitachi ABB Power Grids strives to give employees the tools they need – equipment and information – to be effective. Hitachi ABB Power Grids' physical assets, intellectual property rights and information must be handled with care to avoid loss, theft or damage. Information assets include organizational charts, technologies and processes, manufacturing methods, as well as marketing, advertising, and business development studies and plans.

Company assets are intended to be used for business purposes. Limited personal use is only permissible if it is not in conflict with the interests of Hitachi ABB Power Grids, this Code of Conduct, or Hitachi ABB Power Grids' rules and policies.

We use information systems professionally

Hitachi ABB Power Grids' information systems are there to help us work efficiently and professionally. Generally, such systems should be used only for business purposes, in a manner that does not violate the rights or interests of Hitachi ABB Power Grids, and in line with rules issued by Hitachi ABB Power Grids.

Remember that any communication via e-mail could be regarded as a statement of Hitachi ABB Power Grids. Therefore, employees must be careful not to release information that is commercially sensitive or contentious, or may have undesired contractual or other legal implications for Hitachi ABB Power Grids.

All laws governing copyright, defamation, discrimination and other forms of written communication also apply to online and e-mail communication. Unauthorized or unlicensed software must not be placed onto Hitachi ABB Power Grids' information systems facilities.

Hitachi ABB Power Grids' information systems facilities must not be used to attack the integrity of Hitachi ABB Power Grids' or third parties' networks or data. This includes originating or forwarding chain letters or unsolicited commercial e-mail (spam).

Information produced and stored on Hitachi ABB Power Grids' information systems facilities is regarded as Hitachi ABB Power Grids' property, and Hitachi ABB Power Grids reserves the right to access all such information except where limited by law or agreement. Employees are responsible for keeping their electronic files and archives in an orderly manner.

We safeguard confidential information

Information is an asset. We share some of it in press releases, product information, the annual report and other public documents. Any other information that comes to employees in connection with their work, whatever the source, must be kept confidential to prevent others copying our work or poaching customers. It may also include information that suppliers, customers or partners may have entrusted to Hitachi ABB Power Grids.

Mark information appropriately, keep it secure, and limit access to those who need to know in order to do their jobs. Avoid discussing information in areas where you may be overheard, such as airports, public transport, restaurants and bars, elevators, restrooms and cafeterias.

Information is so valuable that it may be appropriate to ask any outside party given access to confidential information to sign a confidentiality statement approved by Global Function – Legal & Integrity.

We respect the intellectual property rights of others

Hitachi ABB Power Grids protects its own secrets and respects the intellectual property rights of others. Employees must not obtain confidential information of other parties by improper means, or disclose it without authorization.

We avoid and manage conflicts of interest

Conflicts of interest can arise where personal interests or family and other allegiances are at odds with the interests of the company. We can avoid conflicts of interest if we are aware of the challenge and take the necessary action. In general, we should avoid situations in which personal interests, outside activities, financial interests or relationships conflict or appear to conflict with the interests of Hitachi ABB Power Grids, and not allow business dealings on behalf of the company to be influenced by personal considerations or relationships.

The most frequent conflicts of interest arise where an employee is in a position to award business contracts, hire staff, has access to information that may be of interest to the financial markets, or is offered employment by a competitor. Here are some examples of potential conflicts of interest.

- Outside employment: participating in a position similar to the job at Hitachi ABB Power Grids that may conflict with the performance of the job at Hitachi ABB Power Grids, or working with an actual or potential competitor, supplier or customer of Hitachi ABB Power Grids.
- Family members and close personal relationships: contracting with a business managed or owned by a family member or unmarried partner.
- Investments: acquiring an interest in property or companies which Hitachi ABB Power Grids may have an interest in purchasing.
- Board memberships: acting as or accepting a position as an officer, consultant or director of any business or organization involved in the power and automation technologies industry, or involved with Hitachi ABB Power Grids (such as a partner, supplier, or customer).
- Significant ownership interests: owning certain amounts of other companies that do or seek to do business with Hitachi ABB Power Grids, or which are competitors.

Employees who think they may be in a “conflict” must inform their line manager or human resources representative so that the company can determine whether a conflict exists. They will be advised of the proper actions to take, in line with the rules issued by Hitachi ABB Power Grids.

We protect privileged information

Inside information is information not readily available to the public that an investor would consider important in deciding whether to buy or sell a company’s securities. It can be information affecting securities of Hitachi ABB Power Grids or of another company.

Because inside information may have considerable value to investors, it is governed by legislation designed to preserve public confidence in and the integrity of the securities markets in many countries. Hitachi ABB Power Grids has also entered into agreements regarding disclosure of information with stock exchanges on which Hitachi ABB Power Grids shares are listed.

Hitachi ABB Power Grids has strict routines and guidelines for the dissemination of such information, which includes financial data, plans for the future of the business, and changes to key personnel. The laws and agreements with stock exchanges prohibit anyone with inside knowledge from trading the securities or disclosing the information. If employees are unsure whether they have “inside” information, they should contact their supervisor or a representative of Group Function – Legal & Integrity to discuss the situation.

Trading securities such as shares or bonds while in the possession of inside information is both unethical and illegal, and will be dealt with decisively. It is not permitted to share inside information with Hitachi ABB Power Grids employees unless they need to know and are aware of their obligations in handling the information. It is against the law to “tip” or share information with others, including a co-worker, family member or friend who might make an investment decision based on inside information.

We comply with anti-money laundering rules

Hitachi ABB Power Grids’ commitment to fairness, honesty and openness extends to complying fully with all money-laundering laws throughout the world. Money laundering generally occurs when funds from illegitimate sources are brought into legitimate financial channels to hide them or make them appear legitimate.

Employees must protect the integrity and reputation of Hitachi ABB Power Grids by helping to detect possible money laundering activities. They should learn to watch for warning signs, which may include customers who are reluctant to provide complete information or wish to make payments in cash.

We keep accurate and complete financial records

Investors, creditors and others have a legitimate interest in Hitachi ABB Power Grids’ accounts. The integrity of the accounts depends on the accuracy, completeness and timeliness of the entries. All Hitachi ABB Power Grids business transactions must therefore be fully and fairly recorded in accordance with Hitachi ABB Power Grids’ accounting principles and other appropriate requirements. Improper or fraudulent documentation or reporting is illegal.

We act with integrity in handling corporate opportunities

We respect the company’s assets and don’t seek to take personal opportunities or personal gain discovered through the use of Hitachi ABB Power Grids property, information or position.

Responsibility

We show responsibility when we choose business partners with care

How Hitachi ABB Power Grids does business is crucial to its reputation and success, and business partners should be seen as allies. In this section there are guidelines on appropriate conduct towards suppliers, agents and consultants, among others.

The standards in place in a joint venture should also be compatible with those of Hitachi ABB Power Grids.

We are fair in our relations with suppliers

Hitachi ABB Power Grids expects fair competition in its markets and applies the same standard in dealing with suppliers. If you select and/or deal with suppliers, you should not show any favour or preference to any person or business based on anything other than the best interests of Hitachi ABB Power Grids. You must not let your business dealings on behalf of the company be influenced by personal or family interests.

Similarly, all purchases of goods and services for Hitachi ABB Power Grids must be made in accordance with company policies.

We collaborate with agents and consultants

Commissions or fees paid to agents and consultants must be reasonable in relation to the services provided. Employees must not agree or pay commissions or fees that could be considered to be improper payments.

Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials or customers' employees.

We build ties with subcontractors who act like us

We rely on subcontractors to help us execute some projects and value the contribution they make to Hitachi ABB Power Grids' customer relationships and to the company's reputation. To protect and enhance Hitachi ABB Power Grids' reputation, we choose subcontractors who will act in a manner consistent with this Code of Conduct.

We team up with like-minded partners for joint ventures and alliances

Hitachi ABB Power Grids' strength and success also depend on building long-lasting relationships with partners that share our commitment to ethical business principles. The standards of any joint ventures should be compatible with Hitachi ABB Power Grids'.

We extend standards of openness to lenders and export credit agencies

Hitachi ABB Power Grids will disclose all relevant material facts for obtaining financing from an export credit agency or other governmental lenders. It is also company policy to disclose all material facts that would be responsive to any prospective lender's analysis. Certificates issued by Hitachi ABB Power Grids as an export credit agency supplier or exporter must be signed in accordance with Hitachi ABB Power Grids' integrity regulations and standards.

Responsibility

We show responsibility when we observe the highest ethical standards in our interaction with government

Hitachi ABB Power Grids interacts with different groups of stakeholders, including customers, suppliers, shareholders, the media, non-governmental organizations and local officials. The interaction of employees with governments around the world is of particular importance. In this section guidelines are set out on working with officials, and when, if at all, political contributions are allowed.

We cooperate fully with officials

Hitachi ABB Power Grids does business in about 100 countries and values good relations with governments. National and local governments around the world have specific and varied procurement laws to protect the public interest. They generally prohibit offering benefits to individual officials, and often include limitations on hiring current or recently retired officials. Any conduct that may be viewed as improperly influencing objective decision making is forbidden.

Hitachi ABB Power Grids employees must be truthful and accurate in interactions with government officials, and observe the highest ethical standards when conducting business with government representatives.

In dealing with a government, employees are responsible for knowing and complying with applicable laws and regulations, and must not contact government officials on behalf of the company unless it is their job.

We let employees contribute to public affairs in their own time

Employees are free to contribute (without company reimbursement) to a political candidate or party using their own personal time, money or other resources.

Hitachi ABB Power Grids funds, property or services must not be used to support any candidate for political office, political party, official or committee anywhere in the world. Any exceptions to this rule must be cleared in advance with Global Function – Legal & Integrity.

Respect

We show respect for each other when we help each other to succeed

The people who work at Hitachi ABB Power Grids come from many different countries, backgrounds and cultures. We can only appreciate the contribution of each individual if we observe normal standards of courtesy and respect when interacting with one another. Hitachi ABB Power Grids will also be judged by outsiders according to the way they are treated in their business dealings with the company. Clear and regular communications, diversity, equality of opportunity and upholding health and safety are essential to fostering a working environment in which everyone will feel welcome and comfortable.

We foster regular and open communication

Regular communication between managers and their teams is key to business success. This communication, which usually takes the form of meetings and briefings, should cover business strategy, long-term objectives and short-term priorities. Complemented by support from Hitachi ABB Power Grids Group in the form of newsletters, Web sites, training, presentations, etc., communication between employees and their superiors should include making clear how employees are contributing to Hitachi ABB Power Grids' business goals.

Employees have a right to receive their superior's assessment of their performance, which is expected to ascertain progress and, where appropriate, to include proposed plans for further development.

We value mutual respect and privacy

The privacy of personal information – whether from employees, customers, contractors or vendors – is to be respected at all times. Employees must collect, use, store, handle, and disclose individual personal information in accordance with the Hitachi ABB Power Grids privacy policies and applicable laws. Employees may, however, not claim any privacy privileges for communications transacted through Hitachi ABB Power Grids facilities, beyond those provided by local legislation.

Subject to local legislation, Hitachi ABB Power Grids is authorized to supervise the use of e-mail and the Internet. All e-mail and Internet communications made through Hitachi ABB Power Grids facilities are treated as Hitachi ABB Power Grids business information, and so may be accessed, retrieved, monitored and disclosed by Hitachi ABB Power Grids.

We celebrate diversity

Hitachi ABB Power Grids views diversity as an asset. Dozens of different businesses in countries around the world have come together over the years under the Hitachi ABB Power Grids umbrella, and Hitachi ABB Power Grids' culture welcomes them all, regardless of gender, nationality, age or physical ability, or any other aspect of diversity. Employees must conduct their business activities with co-workers, customers, stakeholders and business partners with respect for all people without regard to differences or similarities.

Hitachi ABB Power Grids hires and promotes people based on their abilities. Employees should not engage in or support discrimination in hiring, compensation, access to training, promotion, termination or retirement based on gender, age, ethnic and national origin, caste, religion, disability, sexual orientation, union membership or political affiliation.

We work to create an environment free of harassment

Employees won't feel welcome and comfortable at Hitachi ABB Power Grids if they, their co-workers or anyone who has business dealings with Hitachi ABB Power Grids faces harassment. Harassment – be it face-to-face, written, electronic, or verbal – won't be tolerated.

Harassment can take many forms. People may feel harassed by slurs, intimidating or aggressive acts or words, by derogatory jokes or inappropriate gestures, or by unwelcome physical or verbal conduct. Harassment can

also be the communication or display of offensive material linked to any of the aspects of diversity mentioned above, such as gender, religion, race, nationality, sexual orientation or physical ability.

We set the highest health and safety standards

It is our duty to our colleagues, their families and their communities to safeguard the health and safety of every employee at work. Hitachi ABB Power Grids' stringent health and safety policies and reporting requirements are in place to protect the lives and good health of employees.

Hitachi ABB Power Grids' ground rules for employees are: work safely and protect yourself, your co-workers, the community and the environment. The policies, procedures and programmes apply worldwide to promote safe and healthy working conditions, protect the environment, and support Hitachi ABB Power Grids' commitment to compliance with applicable laws and regulations.

You should know and comply with the law and related company policies if you have responsibilities in areas that are subject to safety and/or environmental regulations.

It is also imperative to report dangerous conditions and other unacceptable health, safety or environmental conditions immediately so that workplace accidents are minimized and corrective actions can be taken.

Respect

We show respect when we acknowledge our wider social responsibilities

We at Hitachi ABB Power Grids pride ourselves in being “at home” in the communities in which we operate. Observance of the rule of law is a basic underpinning of our licence to operate.

In this section we look at what Hitachi ABB Power Grids can expect from employees in areas ranging from compliance with the law to protection of the environment. Promoting a sustainable approach to business, both in the way in which we operate and the technologies we provide, are key elements of good corporate citizenship, of being “at home” globally.

We respect the law

Upholding Hitachi ABB Power Grids’ reputation for integrity requires absolute compliance with the law for Hitachi ABB Power Grids and all employees. Employees are expected to be familiar with the law as it applies to their job, and management is expected to provide necessary instruction and advice.

For example, Hitachi ABB Power Grids is strongly committed to non-discriminatory and fair standards, to the protection of the environment, and to the health and safety of employees.

Hitachi ABB Power Grids expects employees to comply with all laws designed to protect health, safety and the environment, to obtain all required permits, and to operate facilities in strict accordance with the relevant laws.

Due to the complex regulatory framework within which Hitachi ABB Power Grids conducts business, issues of legal compliance may arise. On occasion, there may be disagreement on whether Hitachi ABB Power Grids is in full compliance with the law and litigation may occur. At all times Hitachi ABB Power Grids will act responsibly and abide by the final decisions rendered by the courts.

Issues of compliance with the requirements of governmental agencies may also arise. It is important for Hitachi ABB Power Grids management to be informed of any such issues at an early date.

Employees have a responsibility to inform management immediately if there is any indication that such an issue may exist.

We promote sustainable development

Every Hitachi ABB Power Grids employee contributes to achieving the company’s sustainability goals by supporting economic progress, environmental stewardship and social development. One aspect involves taking appropriate initiatives that improve the quality of life in the communities and countries where Hitachi ABB Power Grids operates.

Sustainability means that Hitachi ABB Power Grids treats all stakeholders in a socially responsible manner. Employees can contribute by promoting open dialogue with stakeholders on Hitachi ABB Power Grids’ economic, social and environmental contributions and performance. To do so, employees should familiarize themselves with Hitachi ABB Power Grids’ policy on sustainability, and its economic, environmental and social requirements.

We support environmental responsibility

All Hitachi ABB Power Grids employees have the responsibility to comply with the letter and the spirit of environmental laws and regulations, and respect the environment wherever they work.

We are active members of our communities

Just as Hitachi ABB Power Grids, on a corporate level, strives to exercise citizenship by reaching out to the wider community – through specific projects, charitable donations and practical support for worthy initiatives – the company also encourages individual employees to make an active civic contribution.

Reporting non-compliance

Hitachi ABB Power Grids is a decentralized group, and Hitachi ABB Power Grids companies are expected to make their own independent decisions on various business issues.

However, the standards addressed in this Code of Conduct represent the core of Hitachi ABB Power Grids' global culture and commitment. Group-wide and uniform compliance is essential, and every employee is responsible for upholding these principles.

All employees are required to report any suspected or observed violations of the law, of this Code of Conduct, or of company policies – or if they are asked to do something that might be a violation. Reports may be made to your supervisor, a representative from Global Function – Legal & Integrity, your local or regional head of integrity, the head of integrity, or one of the 4 reporting channels as detailed below.

Employees may report possible violations (anonymously) by using the Business Ethics Hotline, the Ethics Web Portal, by email or by letter as further explained on the Global Function Legal & Integrity intranet page. Employees must be aware, however, that anonymous reports may be more difficult to investigate.

Confidentiality will be maintained to the fullest extent possible. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated, and will be subject to disciplinary action. The same applies to any intentional abuse of these reporting processes.

Employees who have questions about a specific situation should ask for help by using any of the aforementioned contacts. The key is to speak up and bring concerns into the open so that problems can be resolved quickly before serious harm can occur.

It is also a breach of this Code of Conduct to fail to report a violation or suspected violation that employees know about, or to refuse to cooperate with the investigation of a suspected violation.

Penalties for violation

Each employee is responsible for ensuring that his or her conduct and the conduct of anyone reporting to the employee fully comply with the applicable laws, this Code of Conduct, and the company policies. Compliance and integrity, both personal and by subordinates, will be a factor in periodic performance appraisals. Hitachi ABB Power Grids applies “zero tolerance” and will take disciplinary action, up to and including termination of employment, against employees who violate the law, this Code of Conduct or company policies.

Contact us

Hitachi ABB Power Grids Ltd

Brown Boveri Strasse 5, 8050 Zurich, Switzerland

Phone: +41 58 588 60 06

Legal & Integrity Intranet Page: <https://power.hitachi-powergrids.com/what-you-need-for-your-work/legal-and-integrity/integrity>

Legal & Integrity Web Page: www.hitachiabb-powergrids.com/integrity