

Code of **Business Conduct** and **Ethics**



One Hubbell.
One Code.



David G. Nord
Chairman & Chief Executive Officer

A Message from our Chairman and Chief Executive Officer David G. Nord

ALL OF US AT HUBBELL TAKE PRIDE in our long history of creating and delivering the world's most innovative products and solutions in our industry. For generations, each individual Hubbell employee has played a crucial part in developing one of our most valuable assets – the Hubbell reputation. Our strong reputation is built upon the trust that our employees, shareholders, customers and communities place in us to conduct our business with the highest ethical standards. Maintaining this trust requires each of us to operate under the values of *Integrity, Discipline, Collaboration and Excellence*. Our values provide the foundation for the way we do business.

We are pleased to share with you our Code of Business Conduct and Ethics which provides an overview of how we conduct business ethically and in accordance with our values. The Hubbell Code addresses many subjects but the message is always the same: each employee is expected to comply with both the spirit and letter of the Code and the laws of the country in which your workplace is located. By doing this, we are laying the foundation for the One Hubbell culture that will carry us forward to even higher levels of success.

Take the time to read and understand our Code. Think about how it applies to your work and how your actions and decisions could affect others. I encourage each of you to bring forward any issues or concerns about suspected violations of our Code, policy or law.

Thank you for all of your hard work and commitment to the values and practices embodied in our Code and the ongoing success of our great Company.

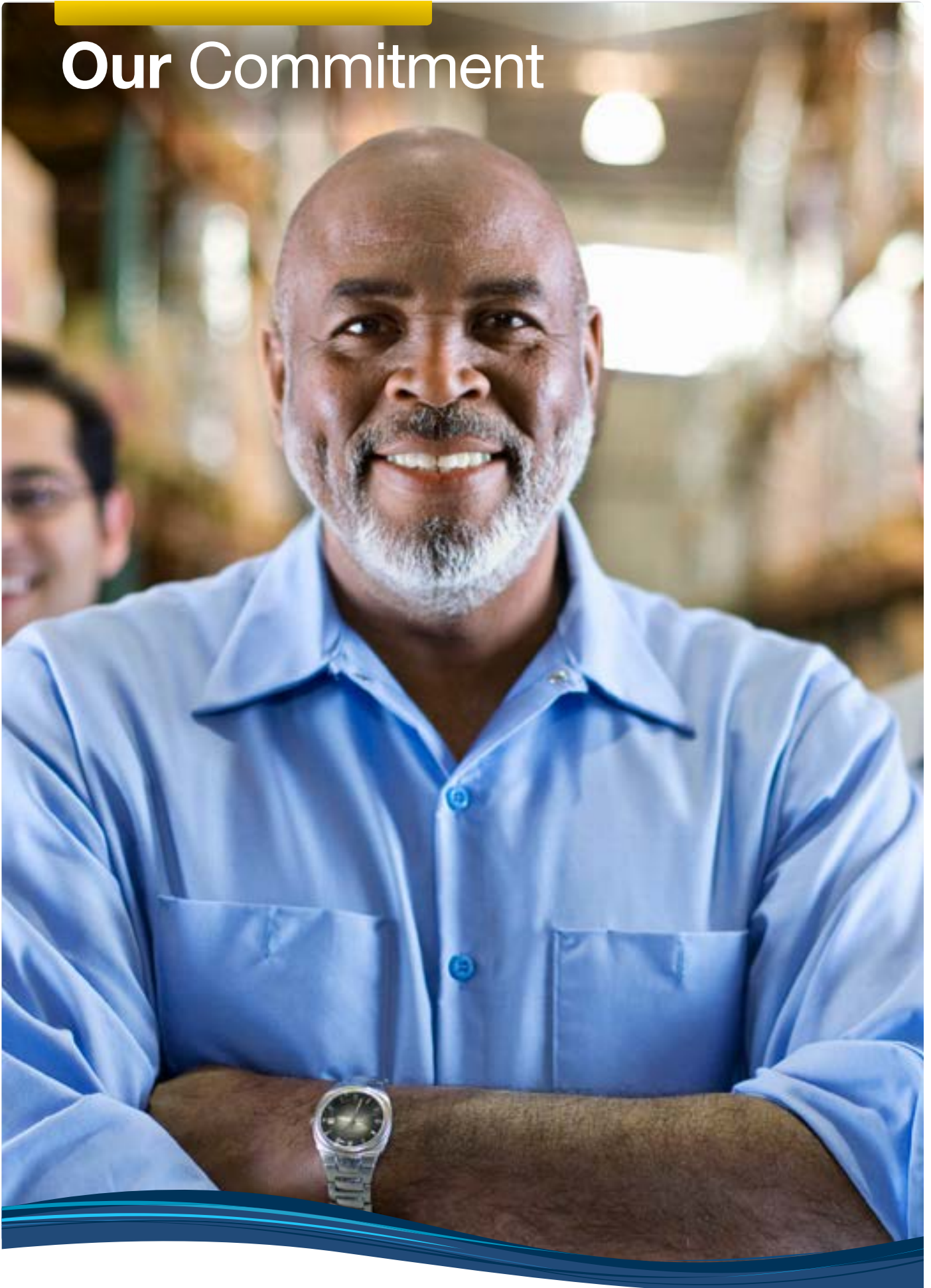
Sincerely,

Contents

- 2 A MESSAGE FROM DAVID G. NORD**
- 4 OUR COMMITMENT**
- 6 INTRODUCTION TO OUR CODE**
 - 7 What is Our Code?
 - 7 Who Should Follow the Code?
 - 8 What Happens When There is A Violation of Our Code?
 - 8 Our Commitment to No Retaliation
 - 9 Ethical Decision Making
 - 10 How to Seek Advice and Raise Concerns
 - 10 Hubbell Code Resources
 - 10 **Speak Up Today:** Your Confidential and Anonymous Connection
- 11 OUR COMMITMENT TO THE COMPANY AND EACH OTHER**
 - 12 Promoting a Positive Workplace and Avoiding Harassment and Discrimination
 - 13 Protecting Personal Information
 - 13 Media Inquiries
 - 14 Safeguarding Company Assets
 - 15 Preventing Disclosure of Inside Information and Insider Trading
 - 16 Financial Integrity & Reporting
 - 17 Following Records Management Procedures
- 18 OUR COMMITMENT TO THE PEOPLE WE SERVE**
 - 19 Communicating Honestly with our Customers, Business Partners and Other Third Parties
 - 20 Protecting Confidential or Proprietary Information
 - 21 Avoiding Bribery and Corruption in Business
 - 22 Competing Fairly in the Marketplace
 - 24 Compliance with Global Trade Regulations
 - 26 Recognizing and Managing Conflicts of Interest
 - 27 Corporate Opportunities
 - 28 Exchanging Appropriate Gifts and Entertainment
- 29 OUR COMMITMENT TO THE COMMUNITY**
 - 30 Protecting Human Rights
 - 30 Maintaining a Safe, Secure and Environmentally Responsible Workplace
 - 31 Respecting our Communities and the Environment
 - 32 Engaging in Political, Government or Charitable Activities
- 33 WAIVERS OF THE CODE**
- 33 SPEAK UP TODAY CONTACT INFORMATION**
- 34 OUR CODE QUICK REFERENCE GUIDE**

One Hubbell.
One Code.

Our Commitment



Our Commitment

Hubbell is committed to high standards of ethical and responsible conduct in compliance with the laws of the countries in which we do business. Underlying this commitment is a set of core values that guide the decisions we make every day in our relationships with the **people we serve**, the **communities we work in**, the **Company** and **each other**.

Integrity

Integrity is at the foundation of all that we do. In our business dealings and in the communities in which we operate, we will conduct ourselves with the highest standards of integrity. This means always doing the right thing even if it means losing a business opportunity.

Collaboration

We work together to achieve our goals, while fostering an environment that encourages personal growth and development. We treat one another respectfully and value our differences in experience and opinion. We recognize the power of One Hubbell and are dedicated to building a prosperous future for Hubbell and each other.

Discipline

We focus on results using industry-leading practices. We ensure that our actions promote a safe and compliant organization. We make timely decisions and share best practices recognizing their importance in delivering superior performance.

Excellence

We are committed to excellence and delivering reliable, high-quality solutions that consistently exceed our customers' expectations. We take pride in everything that we do and understand that the Hubbell reputation is built upon our long-standing history of being the best at what we do.

One Hubbell.
One Code.

Introduction to our Code



What is Our Code?

Our Code serves as the framework for conducting business with the highest level of integrity and reinforces the concept that the way we achieve our business results is just as important as achieving them. At its most basic level, our Code requires us to deal fairly and honestly with fellow Hubbell employees, agents, customers, suppliers, shareholders and the communities in which we work. Our Code is based on the laws, rules and regulations we need to know when performing our jobs, and sets clear expectations for how we should conduct ourselves and our business. Our Code also reflects the terms of Hubbell's internal policies and procedures (which can be found on the Hubbell Intranet, *The WIRE*), and directs us to the appropriate resources should we need guidance.

Annually, you will be asked to certify your commitment to the Code including your obligation to report any known or suspected violations of the Code, law or policy. Please read this Code carefully, taking particular note of sections that apply most to your work. Throughout the Code, additional resources are listed and available to answer questions, address concerns and ensure that issues are properly understood and handled.



Who Should Follow the Code?

Our Code applies worldwide to all employees of Hubbell, directors, officers, majority-owned subsidiaries, representatives, and others acting on behalf of the Company. We expect everyone working on Hubbell's behalf, including vendors, suppliers, agents, contractors, distributors and business partners, to understand and follow our Code and act in a manner that reflects our high ethical standards.



What Happens When There is a Violation of Our Code?

We all have an obligation to take this Code seriously and understand that violations of our Code, Company policy or the law, may result in disciplinary action, up to and including termination. Legal and ethical misconduct can also subject Hubbell and the individuals involved to fines, penalties and civil or criminal prosecution. Hubbell takes reports of possible misconduct seriously, and will review and act upon, all reports of alleged misconduct. Hubbell respects the privacy of every individual and treats reports confidentially, consistent with the need to conduct a thorough investigation and to comply with local law.

Our Commitment to No Retaliation

We are committed to creating an environment where individuals can raise questions or concerns without fear of retaliation. Hubbell does not tolerate retaliation and expects that any reports or concerns raised will be made in good faith. Anyone who retaliates against an individual who raises a concern in good faith will be subject to disciplinary action, up to and including termination.



DEMONSTRATING INTEGRITY MEANS WE:

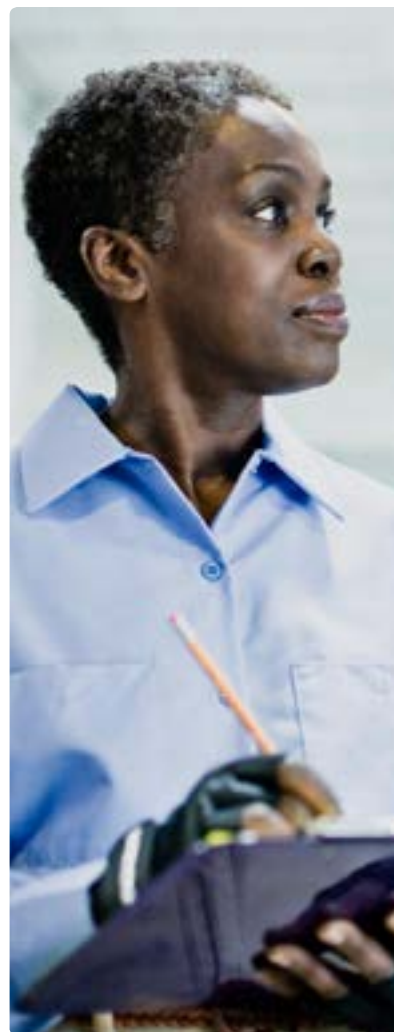
- ◆ Actively promote a culture of integrity.
- ◆ Conduct ourselves according to the highest ethical and legal standards.
- ◆ Follow all policies, laws and regulations.
- ◆ Consider the appearance of our actions.
- ◆ Seek guidance whenever there are questions about our Code, policy or law.
- ◆ Are accountable for our conduct.
- ◆ Complete compliance training timely.
- ◆ Report any known or suspected misconduct or violations of the Code.

If you are a Hubbell manager, supervisor, or leader, you have additional responsibilities under our Code. You are expected to lead by example, model appropriate conduct and ensure that employees understand the Code and other policies.



WORKING AS A HUBBELL MANAGER, SUPERVISOR OR LEADER MEANS WE...

- ◆ Foster an atmosphere that demonstrates the importance of this Code and act as a role model in defining appropriate behavior.
- ◆ Ensure that employees under our direct and indirect supervision familiarize themselves with this Code and receive appropriate training.
- ◆ Ensure that the agents, representatives and others hired to act on behalf of Hubbell are aware of this Code and our expectations for ethical dealings.
- ◆ Create a positive work environment where employees are comfortable raising questions and concerns.
- ◆ Take action if we see or become aware of misconduct or violations of our Code, our policies or the law to one of the Hubbell Code Resources.
- ◆ Never leave the impression that it is appropriate to compromise our values or ethical standards to accomplish business goals.
- ◆ Never retaliate or tolerate retaliation against employees who ask questions or raise concerns in good faith.



Ethical Decision Making

While the Code provides us with guidance for many of the situations we will face at work, we should use our best judgment and common sense when faced with potential ethical dilemmas. Here are some questions you can ask yourself if you are faced with an ethical dilemma:

- ◆ Is it legal? Is it ethical?
- ◆ Is it consistent with Hubbell's values and business strategy?
- ◆ Does the action "feel" right to me?
- ◆ Would I want other people to know what I'm doing?

- ◆ Is there a threat to someone's health or safety?
- ◆ Could Hubbell's business or reputation be compromised by my actions?
- ◆ How would my actions be portrayed in the media?
- ◆ Will I need to cover up my actions?

If you have any doubt on the answers to these questions or are still unclear on what to do, don't simply guess—**seek guidance from one of the Hubbell Code Resources on page 10.**

How to Seek Advice and Raise Concerns

Every single one of us – regardless of our role or seniority – has a personal responsibility to ask questions, raise concerns and report misconduct. **If you suspect that a situation or issue is, or may be, a violation of the Code, policy or the law, you must report your concern.** The Company offers multiple resources to make a report so that you can use the approach that feels most comfortable to you. You can raise concerns to any of the Hubbell Code Resources:

Hubbell Code Resources

- ◆ Your manager
- ◆ Any member of your local or group management
- ◆ The Human Resources Department
- ◆ The Legal or Internal Audit Departments
- ◆ Any member of the Corporate management team
- ◆ Any member of the business function team with the appropriate expertise
- ◆ **Speak Up Today Confidential Reporting Service**



Your Confidential and Anonymous Connection

Hubbell offers a resource where you can ask questions or report concerns confidentially or anonymously. This service – **Speak Up Today** – is managed by an independent third party and is designed to be used in situations where you may be uncomfortable using one of the other Hubbell Code Resources. It is available 24 hours a day, 7 days a week in multiple languages.

You can access this confidential reporting service and **Speak Up Today** using the details below.



By Web:

www.speakuptoday.com



By Phone:

Toll-Free (888) 418-1667

See the back of our Code for International numbers



Q: I think my supervisor is doing something that our Code says is wrong. I'm afraid to make a report about her conduct because she might make my job more difficult for me. What should I do?

A: If you don't feel comfortable discussing it with her directly, you should contact one of the other Hubbell Code Resources. You shouldn't fear any consequences for making a good faith report – Hubbell will not tolerate retaliation.

A photograph of two men in a professional setting. The man in the foreground is wearing a dark green t-shirt and is looking towards the right. The man behind him is wearing a light blue and white plaid button-down shirt and is also looking towards the right. They appear to be in a meeting or discussion. A yellow bar is at the top left, and a blue wavy bar is at the bottom.

Our Commitment to the Company and Each Other

We are committed to creating a dynamic team environment led by the individual contributions of our employees. We pride ourselves on our talented and diverse workforce that leads us to winning the confidence of our customers and exceeding the expectations of our shareholders.

Promoting a Positive Workplace and Avoiding Harassment and Discrimination

Hubbell is committed to recruiting, hiring, promoting and compensating people solely based on their abilities, performance and qualifications for their jobs and to maintaining a professional work environment in which all employees are treated with respect and dignity. Harassment and discrimination of any kind are not tolerated.

As part of our commitment to equal employment, Hubbell does not make any employment-related decisions based on:

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

Q: What is harassment?

A: Harassment includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment. It can take many forms, including physical actions, spoken and written remarks, and videos or pictures. Harassment negatively affects individual work performance and our workplace as a whole, and it will not be tolerated.

WORKING AT HUBBELL MEANS WE...

- ◆ Appreciate the diverse backgrounds of those we work with including our fellow employees, customers, suppliers, and other third parties.
- ◆ Treat others with a high level of professionalism, dignity and respect.
- ◆ Are mindful of any behavior that is offensive or unwelcome.
- ◆ Base employment-related decisions and evaluations on individual qualifications, ability, contributions and demonstrated performance.
- ◆ Immediately speak up when we see behavior that could be a form of harassment or discrimination.
- ◆ Foster an inclusive environment in which different backgrounds, perspectives and points of view are respected and valued.



Protecting Personal Information

As part of our employment, we provide necessary personal information about ourselves and trust that it will be safeguarded by our Company. Hubbell is committed to protecting this personal information and ensuring that we comply with applicable data privacy laws, including those rules surrounding the collection, processing, use, transfer and disclosure of personal information.

"Personal Information" may include items such as:

- ◆ Employment history
- ◆ Government-issued identification numbers
- ◆ Contact information
- ◆ Marital status
- ◆ Criminal records
- ◆ Medical history

WORKING AT HUBBELL MEANS WE...

- ◆ Never share personal information with any other Hubbell team member who does not have a valid business need to know.
- ◆ Will safeguard the personal information of others that we have access to.
- ◆ Contact the Human Resources Department or the Legal Department if we want to access or modify our personal information.
- ◆ Report any suspected breaches of personal information to one of the Hubbell Code Resources on [page 10](#).



Media Inquiries

Communications with the news media and others outside our Company are important and can have an impact on our business and the reputation and image of Hubbell. It is essential that communications from the Company are consistent, accurate, responsible and professional. Hubbell team members must refer all media inquiries to the Hubbell Investor Relations Department.

Safeguarding Company Assets

It is our responsibility to carefully guard Hubbell assets and information, including financial assets, intellectual property, physical property, information systems and confidential information. We are also expected to use such resources responsibly and for appropriate business purposes and not for personal advantage.

“Company assets” include:

- ◆ Cash and other financial assets
- ◆ Company-issued credit cards
- ◆ Facilities
- ◆ Equipment and supplies
- ◆ Computers and network systems; including e-mail, Internet, telephone and voicemail
- ◆ Company-issued mobile phones and iPads
- ◆ P-Cards

WORKING AT HUBBELL **MEANS WE...**

- ◆ Treat Hubbell assets with care, guarding against theft, waste, damage or misuse.
- ◆ Use Company assets to fulfill our job responsibilities or advance our Company's business purposes and goals.
- ◆ Exercise good judgment when using Company computer and communication systems and never create, discuss, or send inappropriate material.
- ◆ Take precautions to prohibit unauthorized access to Hubbell assets, like protecting passwords and other means of entry.





WORKING AT HUBBELL MEANS WE...

- ◆ Do not advise or “tip” others to trade on inside information we may possess.
- ◆ Are careful not to disclose inside information to anyone outside Hubbell, including our family members or friends.
- ◆ Contact the Legal Department if we have any questions about material, non-public information or trading in Company securities.

Preventing Disclosure of Inside Information and Insider Trading

During the course of your employment, you may have access to material, non-public information about Hubbell or other business partners that is not known to the public. “Material non-public information” is information that an investor would find useful in making an investment decision. All Hubbell employees are prohibited from using or sharing this information for the purpose of trading in securities. Using such information for personal financial gain or “tipping” others who might make an investment decision based on inside information is unethical and illegal.

Examples of material, non-public information include:

- ◆ Advance notice of changes in senior management
- ◆ Unannounced mergers or acquisitions
- ◆ Credit history, liquidity or cash problems
- ◆ Pending or threatened litigation
- ◆ Non-public financial results
- ◆ Changes in significant customer relationships
- ◆ Facility closures
- ◆ Increase or decline in business
- ◆ Development of a significant new product or product recall
- ◆ Any information an investor may consider important in making an investment decision

Financial Integrity and Reporting

We are committed to honest, accurate and timely recording and reporting of business information. This is essential to ensuring the proper management of the Company and maintaining and safeguarding investor confidence. All of the information that we report in Company records, financial or otherwise, must fully and accurately reflect the Company's business transactions and comply with all applicable accounting regulations.

We must always exercise sound judgment and follow Company guidelines when documenting expenses, revenues, transactions or reporting on any other financial matter and we must never:

- ◆ Fabricate or overstate expenses.
- ◆ Claim personal expenses as business expenses.
- ◆ Claim expenses that exceed Company guidelines or limits.
- ◆ Claim expenses that someone else paid for.



WORKING AT HUBBELL MEANS WE...

- ◆ Ensure that the information we disclose in our public filings and periodic reports filed with the Securities and Exchange Commission is complete, accurate, fairly stated, and made in a timely and understandable manner.
- ◆ Never conceal the true nature of a transaction or hide funds.
- ◆ Do not create undisclosed or unrecorded accounts or misclassify financial transactions.
- ◆ Always report transactions in the correct time period.
- ◆ Cooperate with audits or other inquiries.
- ◆ Inform the Chief Financial Officer, Corporate Controller or Internal Audit of any transactions, events, or circumstances that could have a material impact on our Company's financial statements.
- ◆ Ensure that those who perform accounting or financial reporting functions know and adhere to these principles and all applicable legal and regulatory standards.

WORKING AT HUBBELL MEANS WE...

- ◆ Comply with Hubbell's records management policies and procedures for documents, files, electronic records and emails.
- ◆ Follow the retention periods specified in the Records Retention Schedule.
- ◆ Follow the instructions in a Litigation Hold Notification.
- ◆ Consult the Legal Department if you have specific questions about the retention period of a document, or if you have questions concerning the documents referred to in a Litigation Hold Notification.

Following Records Management Procedures

We maintain our records responsibly, in accordance with the law and Company policy. We also take care to create records that are clear, accurate and complete.



Q: I recently received a Litigation Hold Notification from the Legal Department, I have some emails in my inbox that I think are “bad” for the Company. What should I do?

A: You are required to retain materials that are listed in the Litigation Hold Notification whether or not you think those materials are “good” or “bad” for the Company.

You must not destroy or delete documents, e-mails, electronically stored information regardless of format, and other tangible things that are listed in the Litigation Hold Notice, even if you think retaining them is burdensome or potentially damaging to you or to the Company.

Our Commitment to the People We Serve



We work hard to exceed customer expectations at all times. We are disciplined in building trust with our customers and the community at large. We are truthful and transparent about our business and strive to continuously improve our products, develop new ideas and ensure that our products are safe and effective. We also take care to protect the ideas, assets and information which make us who we are, and are respectful of information or ideas that are entrusted to us by our customers, shareholders and other third parties.

Communicating Honestly with our Customers, Business Partners and Other Third Parties

Our customers, suppliers and other business partners play a crucial role in our success as a company. We strive to go above and beyond expectations to find new ways to serve our customers and foster relationships that are based on trust, fairness and mutual respect.

WORKING AT HUBBELL MEANS WE...

- ◆ Keep our promises to our customers and deliver high-quality products.
- ◆ Honor contractual commitments.
- ◆ Are honest in all of our dealings with our customers, suppliers, business partners and other third parties.
- ◆ Negotiate contracts fairly and free of deception or inaccuracy.
- ◆ Select suppliers, subcontractors and other third parties based on quality, safety records, technical ability, historical experience, reliability, cost, schedule and availability and never on unfair bias or other inappropriate or illegal reasons.
- ◆ Ensure that our products meet quality standards and that we follow all applicable government regulations.



Protecting Confidential or Proprietary Information

Hubbell's confidential or proprietary information is vital to securing our competitive advantage. We are all personally accountable for protecting not only Hubbell's confidential and proprietary information but also the information of any third-party that we may have access to.

“Confidential and proprietary information” is generally non-public information that we know or possess as a result of our position with Hubbell that might be of use to competitors or harmful to our Company if disclosed. Common examples of confidential and proprietary information include:

- ◆ 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



Q: I had been waiting for an email from a potential client—she's sending a form which I need to fill in for a proposal I am preparing. When the e-mail finally arrived and I opened the attachment—I realized the sender mistakenly attached a confidential business proposal from another company—a competitor competing for the same business I am working on. What should I do?

A: Report the mistake immediately to an appropriate Hubbell Code Resource. Your exposure to another company's confidential information could put Hubbell at risk. Remember we do not use confidential information that we received mistakenly or wrongfully.

WORKING AT HUBBELL MEANS WE...

- ◆ Never disclose confidential or proprietary information to anyone outside of Hubbell or even someone within Hubbell who does not have a clear business need to know.
- ◆ Take appropriate measures to ensure that confidential and proprietary information is never lost, stolen, misplaced or left unattended.
- ◆ Use social media responsibly and do not store, share or discuss Hubbell-related information on personal social media sites or personal email accounts.
- ◆ Take care with confidential information from Hubbell customers, business partners, suppliers or other third parties.
- ◆ Understand that protecting our intellectual property, including patents, trademarks, copyrights and trade secrets, are key to Hubbell's continued business success.

Avoiding Bribery and Corruption in Business

At Hubbell we conduct business fairly and do not give anyone anything of value to obtain an improper business advantage or to influence a business decision. Bribery and corruption are absolutely prohibited in all of our dealings, anywhere we do business, and by anyone who represents us. We must also avoid any behavior that could be perceived as a form of bribery or corruption in any manner, including what are known as “facilitating payments”. This is true everywhere we do business, regardless of local laws and customs.

Q: What is a facilitating payment?

A: A facilitating payment is a small sum of money intended to encourage a government official to take certain actions or make special concessions in their duties.

There are countries where facilitating payments are customary—for instance, to speed up visas, permits, customs or the installation of a telephone line. However, today it is generally accepted that facilitating payments contribute to corruption in a society and most responsible global companies have banned them—just as Hubbell does.

Bribes aren't just envelopes of money.

Under the law, a bribe is anything of value given to a recipient to obtain business or influence a business decision including:

- ◆ Cash equivalents, like gift cards or job offers—for the decision maker or their family member or friend.
- ◆ Gifts that cost you nothing—for instance, an iPhone you received from someone else.
- ◆ Excessive entertainment or hospitality.
- ◆ Travel expenses—for instance, to an industry conference in a resort location.
- ◆ Gifts, entertainment, or hospitality given to family members of the decision maker.
- ◆ Charitable contributions that indirectly benefit a business contact, such as a charitable donation that enhances the individual's social or political standing.



WORKING AT HUBBELL MEANS WE...

- ◆ Never obtain or retain business by paying bribes or engaging in other corrupt actions.
- ◆ Prohibit facilitating payments.
- ◆ Know the rules for working with government officials—understanding these may be stricter than what’s allowed in commercial business.
- ◆ Conduct due diligence on agents and other business partners to ensure they are aligned with our position against bribery.
- ◆ Carefully supervise third parties acting on Hubbell’s behalf, remaining alert for signs that bribery may be taking place.
- ◆ Contact the Legal Department if we have questions about how the bribery rules apply or suspect that bribery may be taking place in the organization.

Competing Fairly in the Marketplace

Throughout our global market, we are committed to competing honestly and fairly, and based solely on the merits of our products. We support and comply with competition laws in the markets and jurisdictions in which we do business. Competition laws — sometimes called antitrust laws — can vary from country to country, but are designed to stop competitors from creating “agreements” that prevent or restrict free competition.

Competition laws strictly prohibit cooperation, or even the appearance of cooperation, with competitors. We must avoid any situation that others could interpret as an “agreement” between competitors and we must never discuss the following topics with our competitors:

- ◆ Price fixing
- ◆ Bid rigging
- ◆ Volume production
- ◆ Allocating customers, markets or territories
- ◆ Coordinating with others to refuse to deal with any customer or supplier



WORKING AT HUBBELL MEANS WE...

- ◆ Are careful to avoid even the appearance of agreeing with a competitor on a matter related to price or competition.
- ◆ Never disclose to competitors our pricing, pricing policies, costs, allowances, discounts or other terms of sale, marketing or strategic plans.
- ◆ Never agree with business partners or competitors on the prices we will charge customers.
- ◆ Never agree to assist a customer in creating false bids to simulate or manipulate competition or support pricing.
- ◆ Never agree with business partners or competitors to divide customers, markets or territories.
- ◆ Never participate in a boycott of certain customers, suppliers, or competitors.
- ◆ Report any anti-competitive practices to the Legal Department.



Q: I will be attending a trade association meeting next month and I know that many of our competitors are also planning to attend. Would it be appropriate for me to ask our competitors about their new products?

A: It depends. While trade association meetings and conferences do serve an important function in promoting information sharing and the discussion of new developments, they also raise serious competition law and antitrust concerns. As an attendee on behalf of Hubbell, you should avoid any discussion of prices, discounts, terms or conditions of sale, product specifications or warranties. If you become aware of such discussions, you should immediately refuse to participate, excuse yourself and contact the Legal Department.





Compliance with Global Trade Regulations

Imports and Exports

As a global company, we export our products around the world and import goods from various countries. We respect and follow the global trade laws and regulations that govern our business activities. We must be familiar with these laws and regulations that apply to our business activities and remember that they are complex and constantly changing. Violations of global trade laws and regulations can result in severe civil and criminal penalties for employees and the Company, and could restrict our ability to export goods to our customers.

An “export” occurs when we ship products, services, technology or software to either a Hubbell or unrelated entity in another country. An “export” includes both the transfer of a physical commodity **and** the transfer of services or technology to another country by e-mail, telephone, or face-to-face either in the United States, or abroad.

“Imports” occur when we bring the goods we purchase from a foreign or external source into another country from where it was purchased. Our import activity is also subject to various laws and regulations. Specifically, this activity may require the payment of customs duties and taxes, as well as the filing of required forms and documents.

WORKING AT HUBBELL MEANS WE...

- ◆ Recognize and understand the global trade laws and controls that apply to the work we do.
- ◆ Apply for and obtain all necessary licenses before sending any product, service, technology or information to another country.
- ◆ Verify that the recipient or end user, if known, is not on a government “denied-party list”.
- ◆ Ensure that the proper duties have been or will be paid.
- ◆ Are alert for illegal boycott requests by our potential business partners and do not take any action or make any statement that could be perceived as our participation in a boycott not sanctioned by the United States.
- ◆ Do not do business with restricted countries, individuals or entities without prior government approval.
- ◆ Do not conduct business with any party who may be engaged in activities such as:
 - » Terrorism
 - » Narcotics trafficking
 - » Illegal export or re-export of controlled technology
 - » Prohibited support of a sanctioned country
- ◆ Contact the Hubbell Trade Compliance or Legal Departments for guidance on any global trade laws.



Recognizing and Managing Conflicts of Interest

We all have a responsibility to act in the best interests of Hubbell and avoid conflicts of interest and situations that may appear to be a conflict of interest. A “conflict of interest” occurs when a personal or family interest interferes with our ability to make sound, objective business decisions on behalf of Hubbell. Our Code cannot possibly cover all of the different types of conflicts of interest that may arise, but is intended to provide insight on the types of activities that could interfere with our ability to make decisions in the best interest of the Company. Any potential conflict of interest involving an employee must be disclosed to and approved by the Legal Department. Any potential conflict of interest involving a director or executive officer must be disclosed to and approved by the Board of Directors or one of its committees.

A “family member” is defined as:

- ◆ Your spouse
- ◆ Domestic partner
- ◆ Parents
- ◆ Children
- ◆ Siblings
- ◆ Aunts and uncles
- ◆ Nieces and nephews
- ◆ Cousins
- ◆ Parents-in-law
- ◆ Brothers- and sisters-in-law
- ◆ Sons- and daughters-in- law
- ◆ Anyone who resides in your home



WORKING AT HUBBELL MEANS WE...

- ◆ Seek approval before we engage in any transactions, activities or relationships that may or could interfere with Hubbell's best interests or with our ability to make decisions objectively.
- ◆ Follow company procedures for hiring or supervising family members.
- ◆ Remove ourselves from any decision regarding a contract or business proposal in which we or a family member have a financial interest.
- ◆ Seek approval before we obtain a significant financial or other interest in a company that competes with, does business with or is seeking to do business with Hubbell.
- ◆ Refuse offers of improper personal benefits in exchange for a favorable business decision, including gifts from someone who would like to do business with Hubbell.
- ◆ Do not perform services or work for a competitor or any other company who does business, or is seeking to do business, with Hubbell. This includes any family member or member of your household who is or works for, a supplier, customer or competitor of Hubbell.
- ◆ Disclose any conflict of interest or potential conflict of interest to the Legal Department or through the online Code training and certification process.

Corporate Opportunities

We owe a duty to the Company to advance the legitimate interests of the Company when the opportunity to do so arises. We are prohibited from directly or indirectly:

- ◆ Taking personally for ourselves opportunities that are discovered through the use of Company property, information or positions;
- ◆ Using Company property, information or positions for personal gain; and
- ◆ Competing with the Company.

Q: I work in the Marketing Department. My wife wants to apply for an open position that was recently posted in the Human Resources Department of one of our biggest suppliers. Can she apply for the job, or would her working there be a conflict of interest?

A: Whenever a family member has an interest in a competitor or business partner, it is important to evaluate several factors to ensure that a conflict of interest does not exist. For example, if your wife were to accept the job at the supplier, it would be important that you were not involved in decisions involving the relationship between the two companies. It's important to remember to always disclose this type of relationship, so that if there is a potential for a conflict of interest, the Company can work with you to evaluate it.



Exchanging Appropriate Gifts and Entertainment

Gifts and entertainment can foster relationships, celebrate business successes and help solidify business partnerships. However, because the exchange of gifts and entertainment can also influence decision-making or give the appearance of impropriety, it is important to understand the rules and avoid even the appearance of improper conduct. We will not give or accept gifts or entertainment that could be seen as a bribe or kickback or are in exchange for a business advantage.

“Gifts and entertainment” include anything of value, such as discounts, loans, cash, favorable terms on any product or service, prizes, transportation, use of vehicles or vacation facilities, stocks or other securities, participation in stock offerings, home improvements, meals, beverages, tickets and gift certificates. The potential list is endless - these are just examples.

Q: One of my customers is coming to the office for a meeting this afternoon, and I am hoping to take her for dinner, as she is staying in a hotel down the street and is not local to the area. If I expense the meal, does this violate the Code?

A: No, provided that the meals and entertainment are reasonable, consistent with customary business practices, could not be considered to be a bribe or payoff, and comply with applicable laws. We understand that entertaining customers assists in building and maintaining strong business relationships. However, we must use good judgment.

WORKING AT HUBBELL MEANS WE...

- ◆ Always use good judgment when exchanging business gifts or entertainment.
- ◆ Ensure that gifts are of nominal value and consistent with local standards and customs.
- ◆ Do not give or receive gifts and entertainment that could influence or create an appearance that it could influence a business decision.
- ◆ Never offer or accept a gift of cash or a cash equivalent, such as gift cards.
- ◆ Avoid situations that could reflect poorly on Hubbell, such as giving or receiving inappropriate gifts or forms of entertainment.
- ◆ Are sensitive to the gift policies of customers and business partners and do not offer anything that might violate their policies.
- ◆ Consult with the Company’s Legal Department before paying any customer travel expenses.



Our Commitment to the Community

As a global company that does business in countries and communities throughout the world, we appreciate the impact that our choices and actions can have on others—including those distant from us by geography or time. We want to advance Hubbell’s business goals in a way that demonstrates our commitment to excellence—not in a manner that is unfair or at the expense of others.

Protecting Human Rights

Hubbell supports the protection of human rights and recognizes its importance in promoting individual health and welfare, economic development and political stability and preventing crimes and corruption. Hubbell follows all laws and regulations that govern our employment practices and acceptable treatment of our employees.



WORKING AT HUBBELL MEANS WE...

- ◆ Do not use child or forced labor in any of our global operations or facilities.
- ◆ Will not tolerate any form of unacceptable treatment of workers in our operations or facilities.
- ◆ Do not permit exploitation of children, physical punishment or abuse, or involuntary servitude.
- ◆ Fully respect all applicable laws that set a minimum wage for employment.
- ◆ Foster a safe and healthy workplace setting to prevent accidents and injury.
- ◆ Respect the right of employees to freedom of association and collective bargaining.

Maintaining a Safe, Secure and Environmentally Responsible Workplace

At Hubbell, we foster a work environment that is free of safety hazards and promote the health and safety of all Hubbell employees, visitors and the communities in which we do business. When performing our job responsibilities, we must comply not only with the processes and procedures that our Company has in place, but also the laws and regulations that apply specifically to our work.

WORKING AT HUBBELL MEANS WE...

- ◆ Are aware of any unsafe practices or hazardous conditions that could interfere with our safety or the safety of others and remedy such conditions.
- ◆ Never work while under the influence of alcohol or illegal drugs.
- ◆ Never engage in behavior that may create an unsafe work environment.
- ◆ Report any workplace injury or situation that could be a violation of our Environmental, Health & Safety (EH&S) policies immediately to a Hubbell Code Resource.





Q: My coworker's breath often smells of alcohol, even sometimes early in the morning. I'm worried that he may be drinking to excess, and may hurt himself or someone else. I don't feel comfortable raising the issue with him and I am not sure if it is any of my business to say something.

A: If you have these concerns, it is important that you speak up. You should speak with your manager or another Hubbell Code Resource. Maintaining a safe work environment and eliminating unnecessary risk are critical concerns for Hubbell. No one should assume that a problem has been spotted or will be reported by someone else.

Respecting our Communities and the Environment

Hubbell is committed to engaging in environmentally sound practices that comply with all environmental laws, rules and regulations that govern our business. Together, we participate actively in improving the communities in which we do business through our environmental stewardship as well as our volunteer and charitable activities. Hubbell gives back to its communities by partnering with non-profit organizations and supporting our employees' volunteer efforts through The Hubbell Foundation.

The Hubbell Foundation

The Hubbell Foundation provides assistance to non-profit organizations that support areas critical to our industry, our employees and our communities. It supports education through The Hubbell Scholarship Program, STEM funding and other program-driven support. It also benefits individual volunteer efforts by matching volunteer hours or donations with funds for the organizations they support. Finally, it works with local, national and global partners to provide immediate funding in the wake of natural disasters and other crises. Visit The WiRE for more information.



THE HUBBELL
FOUNDATION

WORKING AT HUBBELL **MEANS WE...**

- ◆ Embrace the concept of “practicing what we preach” and continuously look for ways to improve our environmental stewardship.
- ◆ Strive to become more energy efficient internally and provide the same type of solutions to our customers.
- ◆ Support and protect the communities and environments where we operate.
- ◆ Work to reduce waste and landfill disposal.
- ◆ Participate in or support Hubbell volunteer opportunities.

Engaging in Political, Government or Charitable Activities

We are all encouraged to actively take an interest in fostering the principles of good government and charitable activities in the communities in which we live and do business. Our participation in any political, government or charitable activities must be conducted in a responsible manner and only utilizing our personal time and resources.

WORKING AT HUBBELL **MEANS WE...**

- ◆ Do not make any political contributions on behalf of Hubbell without prior authorization from the Legal Department.
- ◆ Will not attempt to improperly influence any government agency or representative to obtain a favorable outcome for Hubbell.
- ◆ Engage the Legal Department or The Hubbell Foundation prior to making any charitable contributions on behalf of the Company.





Speak Up Today is a resource where you can ask questions, seek guidance or report concerns confidentially or anonymously.

Use the details below to access **Speak Up Today**:



By Web:

www.speakuptoday.com



Toll-free by phone:

United States and Canada (888) 418-1667

Japan 0800-111-5517

Australia 1-800-159-130

Mexico 01-800-681-6510

Belgium 0800-709-43

Philippines 800-1-116-0928

Brazil Mobile Enabled 0-800-591-7026

Puerto Rico (888)-418-1667

Chile 800-914-496

Singapore 800-852-3432

China 400-120-4958

Spain 900-838975

India 000-800-100-4558

Switzerland Mobile Enabled 0800-080-999

Ireland Mobile Enabled 1-800-947-201

United Kingdom 0-800-014-8378

Italy Mobile Enabled 800-791-932

Waivers of the Code

Waivers of this Code will be granted on a case-by-case basis and only in extraordinary circumstances. Any waiver of this Code for a director or the Company's Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer or Controller, or individuals performing similar functions, or any other executive officer, may be made only by the

Company's Board of Directors or the appropriate committee of the Company's Board of Directors and will be disclosed to the public as required by law or the rules of the New York Stock Exchange. Waivers of this Code for other employees may be made only by an executive officer of the Company with the agreement of the Vice President, General Counsel.

Working at **Hubbell** Means We are Committed to...

OUR COMMITMENT TO THE CODE

- ◆ We comply with both the spirit and the letter of our Code and the laws and regulations that govern our business.
- ◆ We seek help, raise concerns and report known or suspected Code violations.
- ◆ We do not retaliate against any individual who raises a concern in “good faith.”
- ◆ We certify our commitment to the Code and timely complete training.

OUR COMMITMENT TO THE COMPANY AND EACH OTHER

- ◆ We do not tolerate harassment and discrimination.
- ◆ We are committed to protecting the personal information of our employees, business partners and other third parties.
- ◆ We safeguard the assets and information of Hubbell as if they were our own.
- ◆ We do not disclose or trade securities based on any inside information.
- ◆ We record and report our business information in an honest, accurate and timely manner.
- ◆ We manage and retain records in compliance with Litigation Hold Notifications and other retention requirements.



Hubbell is committed to high standards of ethical and responsible conduct in compliance with the laws of the countries in which we do business. Underlying this commitment is a set of core values that guide the decisions we make every day in our relationships with the **people we serve**, the **communities we work in**, the **Company** and **each other**.

OUR COMMITMENT TO THE PEOPLE WE SERVE

- ◆ We communicate honestly and build relationships based on trust, fairness and mutual respect.
- ◆ We do not bribe.
- ◆ We compete solely on the basis of merit and comply with the laws that regulate competition.
- ◆ We export our products and import goods in a manner that is respectful and consistent with global trade regulations.
- ◆ We act in the best interest of the Company and avoid conflicts of interest.
- ◆ We engage in the giving and receiving of gifts and entertainment in a professional and appropriate way.

OUR COMMITMENT TO THE COMMUNITY

- ◆ We support the protection of human rights and the prevention of crime and corruption.
- ◆ We practice fair employment and follow all laws and regulations in our employment practices.
- ◆ We promote a safe and healthy work environment for all Hubbell team members, visitors and the communities where we do business.
- ◆ We are responsible in our political, government and charitable activities.



One Hubbell.
One Code.

