

 <p><b>HUBBELL</b> CORPORATE POLICY</p>	<p><b>ANTICORRUPTION POLICY</b></p> <hr/> <p><b>Owner:</b> Senior Vice President, General Counsel</p>
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## POLICY

No director, officer, or employee shall: (1) offer or accept Bribes, Kick-backs, or Facilitating Payments; (2) make Political or Philanthropic Contributions in order to obtain an unlawful business advantage; (3) commit or engage in Extortion; or (4) suffer demotion, penalty, or other adverse consequences for not paying Bribes, Kick-backs or Facilitating Payments. The payment of any Customer Travel expenses and the offering or acceptance of any Gifts, Hospitality and Entertainment are permissible *provided that* the conditions described within the definitions of Customer Travel and Gifts, Hospitality and Entertainment set forth below are met. The Company will, where appropriate, sanction directors, officers, employees, associated persons and business partners for violations of this Policy.

## SCOPE

This Policy shall apply to all directors, officers and employees of Hubbell Incorporated, its subsidiaries, divisions and affiliates (“Company”) and, where necessary and appropriate, all Associated Persons and Business Partners.

## PURPOSE

The purpose of this Policy is to provide guidance and reaffirm standards and procedures to assist each director, officer and employee of the Company in conducting business with integrity and in compliance with all applicable Anticorruption Laws.

## DEFINITIONS

**Anticorruption Laws** – U.S. Foreign Corrupt Practices Act, including anti-bribery, books and records and internal accounting control provisions, and other applicable foreign law counterparts.

**Associated Persons and Business Partners** - Outside parties acting and performing services on behalf of the Company in a foreign jurisdiction, including but not limited to, agents, consultants, representatives, distributors, subcontractors, teaming partners and joint venture partners.

**Bribery** - Bribery includes any offer, promise, payment or gift of any monetary or other benefit, whether directly or through intermediaries, to a government official or any private sector employee, in order to influence or induce that official or employee to breach his duties of good faith, impartiality or trust to his employer or public body or to act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

**Customer Travel** – Payment of customer travel expenses that are: (i) proportionate, reasonable and bona fide expenditures directly related to the promotion, demonstration or explanation of Company products or services or the execution or performance of a customer contract; (ii) made directly to the vendor/provider of the service, e.g., hotel, airline, car rental agency; (iii) authorized and approved by a senior executive officer in consultation with the Company’s Corporate Legal Department; and (iv) in compliance with the law of the recipient’s country.

**Extortion** – Extortion is a direct or indirect request(s) by a public official, political party, party official, or private sector employee for undue pecuniary or other advantages in order to act or refrain from acting in relation to his or her duties.

**Facilitating Payments** – Facilitating payments are bribes made with the intention of incentivizing the expeditious completion of an administrative process that would otherwise be required.

**Gifts, Hospitality, and Entertainment** – Payment of gifts, meals, hospitality, or entertainment that: (i) could materially affect the outcome of a business transaction(s), (ii) are not proportionate, reasonable, or bona fide expenditures, or (iii) are in violation of the laws of the country of the recipient.

**Kick-backs** - Kick-backs are a form of bribe in which a person entrusted by a private sector employer or public body has some responsibility for the granting of a benefit and does so in a way that secures a return of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

**Philanthropic Contributions** – Philanthropic Contributions are contributions made for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made.

**Political Contributions** – Political Contributions are contributions made to a foreign political party, political party official or candidate.