ANTI-CORRUPTION PROCEDURES

1.0 POLICY PURPOSE AND LEGAL CONTEXT

1.1 These *Anti-Corruption Procedures* (the "**Procedures**") provide guidance for the implementation of the Fortis Inc. (the "**Corporation**") *Anti-Corruption Policy* (the "**Policy**"). These Procedures establish practical measures to ensure that the Corporation's day-to-day business is conducted consistent with the Policy.

1.2 Anti-corruption laws vary from country to country, but they all generally deal with dishonest and unethical business conduct, including bribery of public officials (and, in some cases, private counterparties), the inappropriate giving of gifts and benefits and the concealment of the true substance of business transactions through inadequate record keeping. These Procedures incorporate elements of anti-corruption legislation in Canada, the United States and the United Kingdom, creating a framework that reflects the most stringent standards.

1.3 Questions about the Policy, these Procedures and/or the requirements of applicable anti-corruption laws should be directed to the Senior Legal Counsel, Compliance.

2.0 DEFINITIONS

2.1 "**Bribe**" means an offer or gift of anything of value to gain an improper advantage or to improperly influence the recipient's actions. This term includes directly or indirectly making a payment to a person knowing, or being reasonably expected to know, that such person will provide it or arrange for it to be provided to a foreign or domestic government official.

2.2 "**Fortis Personnel**" means an employee, officer or director of the Corporation.

2.3 "**Non-governmental or Commercial Party**" means any non-governmental or commercial entity or individual (that is not a Public Official) with whom the Corporation (or any subsidiary of the Corporation, as applicable) does or proposes to do business (including non-profit entities).

2.4 "**Public Official**" is broadly defined to include an employee, a person appointed or elected to discharge a public duty, or candidate for office, of:

2.4.1 any level of government or government department, branch, division, agency, state-owned enterprise, administrative or judicial body;

2.4.2 a public international organization;

2.4.3 a political party or organization; and

2.4.4 an Indigenous, Aboriginal or First Nations government or group.

Anyone acting on behalf of an individual mentioned above, or in an acting capacity, is considered a Public Official under the Policy and these Procedures. A person does not cease to be a Public Official by claiming to act in a private capacity or by the fact that they serve without compensation.

2.5 "**Third Party**" means any entity or individual retained to procure or transact business (including non-profit activities) on behalf of the Corporation outside of Canada, including, but not limited to, consultants, advisors, contractors, local agents and lobbyists.

2.6 In these Procedures, references to a "**Department**" means that department of the Corporation.

3.0 MAIN POLICY COMPONENTS

3.1 **Application**

3.1.1 These Procedures apply to Fortis Personnel, and subject to the provisions herein, Third Parties retained to act for the Corporation.

3.1.2 These Procedures govern dealings with "Public Officials" and "Non-governmental or Commercial Parties" as defined above in section 2.

3.2 **Bribery**

3.2.1 Any form of bribery is strictly prohibited. Anti-bribery laws broadly prohibit the direct or indirect giving, promising, offering or payment of anything of value to any Public Official in order to secure or keep business or to secure some other improper advantage or concession. This prohibition also extends to anything done to cause a Public Official to violate a legal duty or misuse their position. Effectively, these laws, the Policy and these Procedures prohibit the giving of anything of value to influence a Public Official's actions.

3.2.2 Some anti-bribery laws, such as the United Kingdom's *Bribery Act*, also prohibit the accepting (not just the offering or payment) of bribes, and bribery in transactions involving private parties. These Procedures are to be interpreted and implemented so as to equally prohibit both the offering or accepting of bribes, and to equally apply to transactions with any (i) Public Official or (ii) Non-governmental or Commercial Party.

3.2.3 This prohibition against all forms of bribery extends to the making of "**facilitating payments**" as well, even if they are considered as customary in the particular jurisdiction. The term "facilitating payment" generally refers to the making of small payments to Public Officials to facilitate or speed up the completion of some routine non-discretionary action or service that one is already entitled to under the laws and regulations of that jurisdiction. This could include things like expediting legitimate tax refunds, customs inspections, immigration processes or the issuance of licenses or permits. "Facilitating payments" do not include fees to expedite services that are part of a published fee schedule (for example, an expedited rate for obtaining a passport that can be found in a public fee schedule). As an exception, facilitating payments may be permitted in rare circumstances, such as where there is an imminent threat to personal health or safety of a person, in which case the Chief Financial Officer or Vice President, Controller should be consulted for guidance when possible.

3.2.4 Fortis Personnel must avoid even the appearance of improper interaction with Public Officials or Non-governmental or Commercial Parties. Our corporate reputation and the strength of our brand are the result of our unwavering commitment to the principles of integrity and ethical business conduct. These valuable assets could be jeopardized by the mere perception of inappropriate behavior, even if based on a misapprehension of the actual facts. As a result, you must always be conscious of how your actions and behaviour may be perceived or construed by others, and act accordingly.

3.3 Lobbying

3.3.1 Most jurisdictions regulate how professional and in-house lobbyists may interact with government representatives and, in particular, Public Officials. Such regulations generally define the types of activities that constitute "lobbying" and may require, among other things, lobbyist registration, payment of fees and disclosure of the subject matter of lobbying activity.

3.3.2 Before meeting with any Public Official, you should consider whether the subject matter of the meeting will constitute "lobbying" under applicable laws and whether registration is required, or any other steps need to be taken, to comply with applicable lobbying regulations.

3.3.3 Fortis Personnel and Third Parties engaging in lobbying activities must comply with all applicable lobbying legislation and regulations. Fortis Personnel must also report all lobbying activities to the Communications Department in accordance with the reporting timelines and processes established by that department. The Communications Department will maintain a log containing the details of lobbying meetings with Public Officials, including the time, place, attendees and the subject matter discussed.

3.3.4 Fortis Personnel may also participate in trade associations that represent our industry and engage in advocacy on public policy issues of relevance to our business. These activities will be monitored to ensure the Corporation's compliance with applicable lobbying laws and must be conducted in accordance with the Corporation's *Political Engagement Policy*.

3.3.5 If you have questions regarding compliance requirements under lobbying regulations, please consult the Vice President, Communications and Government Relations, who may consult with the legal department.

3.4 **Gifts, Meals, Entertainment, Travel, Charitable Donations and Hiring**

3.4.1 Gifts, meals, entertainment or travel (referred to collectively in this section simply as "**gifts**") should never be given to any Public Official or Non-governmental or Commercial Party to exert improper influence or to obtain, or as a *quid pro quo* for the granting of, an improper business benefit or advantage.

3.4.2 The following basic rules apply to the giving of gifts to any Public Official or Non-governmental or Commercial Party:

3.4.2.1 Gifts are appropriate only where reasonable and customary, and permitted under applicable law. Note, however, that the giving of gifts is not allowed based on a justification that "this is the way business is customarily done here", where it would objectively constitute inappropriate business conduct under the Policy, these Procedures or the Corporation's *Code of Conduct* (the "**Code of Conduct**"). The Corporation follows the same high ethical standards in all business transactions, and these standards do not vary depending on location.

3.4.2.2 Gifts in the form of cash or cash equivalents (e.g., cheques, bank drafts, money orders, pre-loaded credit cards, gift cards or gift certificates) are prohibited.

3.4.2.3 Gifts should be of a modest value, reasonably priced and merely reflecting a business courtesy or goodwill gesture. Lavish gifts are prohibited.

3.4.2.4 Gifts should only be given on an infrequent, non-recurring basis. Patterns of ongoing or frequent gift-giving would normally be considered odd and suggestive of some hidden agenda or ulterior motive. Further, gifts must *never* be given when the Corporation or one of its subsidiaries has a request, decision or proceeding pending before the recipient.

3.4.2.5 Gifts should be given in a transparent manner. There should be a legitimate reason for giving a gift, such as to celebrate or honour a business relationship, achievement or milestone, where it cannot reasonably be construed as a bribe.

3.4.2.6 Gifts given having a value of US$100 or more must be reported to the Communications Department and correctly documented in the Corporation's books and records by the Communications Department. This requirement does not apply to meals if the cost and content is reasonable, moderate, appropriate and customary in the circumstances.

3.4.2.7 Before offering to make any gift having a value of US$100 or more to (i) any Public Official, prior written approval must be obtained from the Chief Executive Officer, Chief Financial Officer, Chief Legal Officer or the Vice President, Communications and Government Relations, or to (ii) any Non-governmental or Commercial Party, prior written approval must be obtained from an officer of the Corporation at the Executive Vice President level or above, or from the Vice President, Communications and Government Relations. These pre-approval requirements do not apply to meals and entertainment if the cost and content is reasonable, moderate, appropriate and customary in the circumstances.

3.4.3 All donations by the Corporation to charitable, philanthropic or community causes or organizations must be coordinated through the Communications Department. Such donations should never be given to exert improper influence or to obtain, or as a *quid pro quo* for the granting of, an improper business benefit or advantage. In certain circumstances, donations in response to solicitations could have an appearance of impropriety. Therefore, before offering to make any donation in response to a solicitation by or on behalf of any Public Official or Non-governmental or Commercial Party, prior written approval must be obtained from the Chief Executive Officer, Chief Financial Officer, Chief Legal Officer or the Vice President, Communications and Government Relations. All such donations must be correctly documented in the Corporation's books and records by the Communications Department.

3.4.4 Offers of jobs, contracts or internships must never be made to exert improper influence or to obtain, or as a *quid pro quo* for the granting of, an improper business benefit or advantage. Before offering a job, contract or internship, whether with or without pay, to a person who is known to be a Public Official, a relative of a Public Official, or to a person who is known to be or who is related to a Non-governmental or Commercial Party (or principal thereof), prior written approval must be obtained from the Chief Legal Officer or the Senior Legal Counsel, Compliance.

3.5 Political Contributions

3.5.1 Political contributions must be made in accordance with the Corporation's *Political Engagement Policy*.

3.5.2 All interaction with Public Officials must be conducted in accordance with the lobbying provisions in these Procedures (see section 3.3).

3.6 Record Keeping

3.6.1 Persons who engage in corrupt business practices often attempt to conceal their activity through the manipulation of accounting and other records. To address this, some anti-corruption laws contain provisions that specifically create offences for a failure to keep accurate business records.

3.6.2 The Corporation and Fortis Personnel must maintain books, records and accounts that, in reasonable detail, accurately reflect the substance of all business transactions. To this end, such books, records and accounts must not misstate facts, omit relevant information or delay the reporting of information so as to mislead or to assist others in doing so.

3.6.3 The Corporation shall maintain a system of internal controls that is sufficient to assure the integrity of its books, records and accounts and management's control, authority and responsibility over our corporate assets.

3.6.4 Fortis Personnel are responsible for promptly reporting all payments, business transactions and acquisitions or dispositions of assets and for clearly identifying the purpose of such transactions in the applicable books, records and accounts of the Corporation. No accounting record or other document relating to any business transaction may be falsified in any manner which may obscure or disguise the true nature of the transaction.

3.7 **Use of Third Party Agents**

3.7.1 Generally, anti-corruption legislation applies equally to Fortis Personnel as well as Third Parties. Therefore, Third Parties are required to comply with applicable anti-corruption laws, the Policy and these Procedures.

3.7.2 Before Fortis Personnel engage any new Third Party, due diligence must be conducted to verify the background, credentials, references and sound reputation of the Third Party. The Legal Department must be briefed on the results of the due diligence exercise and directly involved in the drafting and pre-approval of Third Party retainer agreements.

3.7.3 Fortis Personnel engaging Third Parties are responsible for ensuring that Third Parties are aware of the Fortis Vendor Code of Conduct ("**Vendor Code**"), the Policy and these Procedures, and either contractually commit to comply with the same or demonstrate to the satisfaction of the Legal Department that the Third Party has its own substantially similar policies . The Legal Department shall be consulted and make the final determination of the actual contract language to be used.

3.7.4 Payments for services rendered by Third Parties may not be made in cash, or made payable to any entity other than the Third Party itself, unless authorized by the Chief Financial Officer. Further, payments must represent reasonable and proportionate compensation for the services actually provided as fully described in an invoice issued by the Third Party prior to any payment being made, and must be accurately and promptly recorded in the Corporation's books and records.

3.7.5 Fortis Personnel who retain a Third Party must monitor the activities of the Third Party during the term of the engagement and must review and approve invoices submitted by the Third Party for services rendered, including any disbursements incurred by the Third Party.

3.8 Contracts

3.8.1 The Legal Department has general responsibility for approving contracts being entered into by the Corporation. In performing this role, the Legal Department will assess each contract and incorporate anti-corruption provisions as required based on the context.

3.8.2 As indicated above, the Legal Department must be directly involved in the drafting and pre-approval of all Third Party retainer agreements.

3.9 Red Flags

3.9.1 You should always look into any activities that seem unusual or inappropriate, or which otherwise may raise red flags. Persons subject to the Policy should speak up and seek guidance from the Senior Legal Counsel, Compliance if they have any questions regarding the interpretation or application of the Policy or these Procedures or require assistance in gaining awareness of the applicable laws of any jurisdiction.

3.9.2 The following are some situations that could raise red flags and warrant further investigation:

3.9.2.1 Payment and Compensation:

3.9.2.1.1 Requests by a Third Party for payment in cash or bearer instruments;

3.9.2.1.2 The payment method requested is unusual for a business transaction, such as payments to an account in a country unconnected to the transaction;

3.9.2.1.3 The amount of compensation requested by a Third Party is more than normally expected for the services, or excessive in light of the corresponding level of services or risk;

3.9.2.1.4 Requests for an unreasonably high lump sum in order to obtain a permit;

3.9.2.1.5 Requests for a payment, discount or rebate that is not provided for in the contract with that party;

3.9.2.1.6 Requests to prepare a cheque for more than the actual amount of expenses or for poorly documented expenses, extend an unusually large credit line or provide a substantial upfront payment;

3.9.2.1.7 Requests by a Public Official or Third Party for travel for a family member unrelated to any business purpose;

3.9.2.1.8 Gifts that are not appropriate given the business and economic condition of the foreign country; or

3.9.2.1.9 Multiple invoices or gifts in the same or similar amount to the same or related vendors, especially those that may appear to be designed to fall under a legal, regulatory or policy threshold.

3.9.2.2 Third Party Status:

3.9.2.2.1 Dealing with a Third Party who is also a Public Official;

3.9.2.2.2 The Third Party has a personal, family or business relationship with a Public Official;

3.9.2.2.3 The Third Party's family members or relatives are senior officials in the foreign government or ruling political party; or

3.9.2.2.4 The transaction involves or takes place in a country with a reputation for bribery and corruption according to reputable international organizations. For example, refer to the following link for the

Transparency International Corruption Perceptions Index: https://www.transparency.org/en/cpi/2024.

3.9.2.3 Public Official or Third Party Actions or Statements:

3.9.2.3.1 A Public Official requests an improper or unusual payment or favour in exchange for "helping with our business";

3.9.2.3.2 A Public Official recommends or suggests hiring a particular adviser to help obtain a government contract or address an issue that is within the jurisdiction of such official;

3.9.2.3.3 Statements that a proposed payment or gift is a "way of doing business" in the country;

3.9.2.3.4 Family members of a Public Official are on the payroll of a Third Party;

3.9.2.3.5 Statements or suggestions that a political or charitable contribution would influence or expedite an official action;

3.9.2.3.6 The Third Party does not fully and truthfully disclose all of the information requested by the Corporation;

3.9.2.3.7 The Third Party has been recommended by an official of a potential customer or a Public Official;

3.9.2.3.8 The Third Party has a bad reputation or is new to the business (may be indicated by the failure to provide references);

3.9.2.3.9 The Third Party requests that their identity not be disclosed or has undisclosed sub-agents or contractors who assist with the work;

3.9.2.3.10 The Third Party refuses to sign representations, warranties and covenants that they have not violated and will not violate anti-corruption or anti-bribery laws; or

3.9.2.3.11 The Third Party does not have the resources or staff to undertake the scope of the work required by the agreement or, at the other extreme, the representative involves unnecessary third parties or multiple intermediaries performing similar functions.

Disregarding these or similar "red flags" of an improper inducement can result in a violation of the Policy and these Procedures.

4.0 EDUCATION AND CERTIFICATION

4.1 Education and training on the Policy and these Procedures may be required for Fortis Personnel as outlined in the Policy.

4.2 Fortis Personnel may also be required to complete periodic certifications that they: (i) have read, understand and undertake to comply with the Policy and these Procedures; (ii) are not aware of any violations of the Policy or these Procedures; and (iii) undertake to immediately report in good faith any actual, potential or reasonably suspected violations in accordance with section 5.

5.0 COMPLIANCE AND ENFORCEMENT

5.1 Fortis Personnel must report any actual, potential or suspected violations of the Policy or these Procedures promptly to their immediate supervisor, a member of senior management, the Senior Legal Counsel, Compliance or the Administrator designated under the Corporation's *Policy on Reporting Allegations of Suspected Improper Conduct and Wrongdoing* ("**Speak Up Policy**"). No retaliatory action will be taken against any person for providing information in good faith, either internally or to a government authority, or participating in any proceeding concerning alleged violations of the Policy or these Procedures.

5.2 To facilitate reporting under the Speak Up Policy of actual, potential or suspected violations of the Policy, these Procedures or applicable laws, the Corporation has retained the services of NAVEX, a third-party provider of confidential, anonymous reporting services, accessible by telephone at 1-866-294-5534 or through the internet at www.FortisInc.ethicspoint.com.

6.0 EFFECTIVE DATE

6.1 These Procedures, as amended and restated, are dated and effective as of January 1, 2026.

7.0 REVIEW

7.1 These Procedures shall be reviewed periodically.