

# SCOTTISHPOWER POLICY ON RESPECT FOR HUMAN RIGHTS

6 May 2025

The Board of Directors of Scottish Power Limited (the “**Company**”) has the power to design, assess and continuously revise the Company’s Governance and Sustainability System, and specifically to approve and update policies, which contain the guidelines governing the conduct of the Company, and furthermore, to the extent applicable, inform the policies that the companies belonging to the group of which the Company is the controlling entity, within the meaning established by law (the “**SP Group**”), decide to approve in the exercise of their autonomy.

In exercising these powers, within the framework of legal regulations, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, and aware that the respect for human rights is a fundamental part on which the Company’s Governance and Sustainability System is based, the Board of Directors hereby approves this *ScottishPower Policy on Respect for Human Rights* (the “**Policy**”), which respects, further develops and adapts the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* with respect to the Company.

## 1. Scope of Application

This *Policy* applies to the Company. Without prejudice to the foregoing, it includes basic principles that, in the area of respect for human rights, complement those contained in the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* and, to this extent, must inform the conduct and standards-setting implemented by the other companies of the SP Group in this area in the exercise of their powers and in accordance with their autonomy.

To the extent applicable, these Principles must also inform the conduct of the foundations linked to the SP Group.

For companies that do not form part of the SP Group but in which the Company holds an interest, as well as for joint ventures, temporary joint ventures (*uniones temporales de empresas*) and other entities in which it assumes management, the Company shall also promote the alignment of its regulations with the basic principles regarding respect for human rights contained in this *Policy*.

## 2. Purpose

The purpose of this *Policy* is to formalise the commitment of the Company to human rights recognised in applicable legal provisions and to define the main principles of conduct that shall be applied within the Company for due diligence in the area of human rights pursuant to applicable legal provisions and/or the United Nations (UN) *Guiding Principles on Business and Human Rights*, the *OECD Guidelines for Multinational Enterprises*, the

principles underpinning the *United Nations Global Compact*, the *Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy*, the conventions of the International Labour Organization (including Convention 169), the *Universal Declaration of Human Rights*, the *United Nations Declaration on the Rights of Indigenous Peoples*, as well as such documents and texts as may replace or supplement those mentioned above, and with the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group*.

### **3. Main Principles of Conduct**

The Company adopts and promotes the following principles in relation to human rights:

- a) Identify the potential impacts on the human rights of affected communities and groups that the operations and activities carried out by the Company, its subsidiaries or its value chain may generate.
- b) Have due diligence processes that identify situations and activities and manage above all those with a higher risk of violating human rights, in order to develop mechanisms for the prevention of such risk, as well as for mitigation and ultimately redress of the impacts if they occur.
- c) Evaluate the effectiveness of the due diligence processes on a regular basis using monitoring indicators, with special attention on those facilities in which there might be a higher risk of violating human rights. This evaluation will rely on the internal control systems of the SP Group's companies.
- d) Report the results of the evaluation of the effectiveness of the due diligence processes in the information that the Company periodically publishes and that is available on its corporate website.
- e) Advance a culture of respect for human rights and actions intended to promote training and awareness-raising in this field directed at the people of ScottishPower, the communities and the other Stakeholders of the Company.
- f) Have in place reporting and grievance mechanisms, equipped with adequate guarantees and settlement procedures, in order to respond to potential violations of human rights. These mechanisms should be communicated both to the professionals and to external persons and organisations, their communities, legitimate representatives and professionals in their value chain. To this end, internal management and reporting procedures regarding the issues communicated shall be defined in order to allow for an evaluation of the due diligence processes.
- g) If a violation of human rights is detected at the facilities of the Company or at those of its suppliers, adopt as soon as possible any corrective measures that provide the affected persons with access to an effective remedy through legitimate processes and active cooperation, and report to the competent government authorities if such violation may amount to an administrative, criminal or any other type of offence.

#### **4. Expectations in relation to Stakeholders**

The Company recognises and adopts the universality, indivisibility and interdependence of human rights, as well as the need for the protection thereof in its relations with its Stakeholders, and particularly with ScottishPower's people, the supply chain, shareholders and the financial community.

As regards ScottishPower's people, the professionals of the Company must show strict respect for the human rights recognised under applicable legal provisions in the conduct of their activities in all countries in which they operate, and shall particularly endeavour to ensure compliance with this *Policy* and with the regulatory framework for human rights established at the SP Group level.

The Company expects all of its professionals to act as a first line of defence for human rights, reporting any potential impact thereon or breach of the Company's policies through the channels activated within the internal reporting system referred to in the *ScottishPower Internal Reporting and Whistleblower Protection System*.

On the other hand, the Company is aware that the supply chain is configured globally and that not all links in the supply chain have sufficient traceability mechanisms. Therefore, the Company shall continue to identify actions and opportunities to address the impacts and risks related human rights in its direct activities and shall and shall promote the identification thereof within the supply chain, in collaboration with its Stakeholders, through the corresponding due diligence process.

In particular, the Company believes that its suppliers are a key ally for compliance with this *Policy* and thus assume a shared responsibility therewith and must also show strict respect for the human rights recognised by applicable legal provisions and the highest international standards in carrying out their business activities. In this regard, suppliers shall respect the commitments regarding labour practices, health and safety, and the environment, as well as their other commitments regarding respect for human rights as set out in the *ScottishPower Code of Conduct and Disciplinary Rules* and the *ScottishPower Code of Conduct for Suppliers*.

In relation to shareholders and the financial community, and particularly in relation to investment partners with operational control over the Company's facilities, the alignment of their own policies with this *Policy* shall be promoted.

#### **5. Implementation and Monitoring**

For the implementation and monitoring of the provisions of this *Policy*, the Board of Directors is assisted by the Sustainability Reporting Team of the CEO Office (or such division as assumes the powers thereof at any time), which shall establish a procedure for regular monitoring and reporting to the Board of Directors.

The Sustainability Reporting Team of the CEO Office (or such division as assumes the powers thereof at any time) shall supervise and coordinate with the Corporate Sustainability Division of Iberdrola S.A. in relation to compliance with the provisions of the *Ethical and*

*Basic Principles of Governance and Sustainability of the Iberdrola Group* and the *Code of Conduct for Directors, Professionals, and Suppliers* regarding respect for human rights and of this *Policy*.

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This *Policy* was approved by the Board of Directors of Scottish Power Limited on 6 May 2025 and adopted by the Board of Directors of ScottishPower Renewable Energy Limited on 11 June 2025.