Modern Slavery
Policy

ScottishPower Compliance Division
SUSTAINABLE, ETHICAL WORKING

Prepared:	Reviewed:	Approved:
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ScottishPower Compliance Division	ScottishPower Chief Compliance Officer	Scottish Power Limited Board of Directors

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SCOTTISHPOWER

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Version Control

VERSION	AUTHOR	PURPOSE	DATE
1.0	SP Compliance Division	Final approved version	October 2022

1. Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, but ultimately means the reduction of a person's freedom by another, in order to exploit them for personal or commercial gain. At ScottishPower (the "Company"), we are strongly opposed to any form of Modern Slavery in either our business or supply chain and believe it has no place in an ethical business model. We are committed to combatting such activity that is connected to our business.

As part of the Iberdrola Group (the "Group"), we maintain a number of policies that are designed to protect and strengthen Human Rights within the organisation. These policies form a hierarchy which commits ScottishPower and it's suppliers to maintaining the standards of business ethics and human rights that are considered best practice, through establishing principles relating to:

- delivering clear value for society through our activities
- recognizing Human and labour rights commitments enshrined in international law
- encouraging ethical and responsible behaviour by employees; and
- requiring suppliers to adhere to the same principles of business ethics and human rights.

The ScottishPower Modern Slavery Policy (the "Policy") is designed to consolidate those principles and set out how they are applied within Scottish Power.

For ScottishPower employees, the Policy is accompanied by the ScottishPower Compliance Manual, which provides further guidance for employees on key signs of potential risk for Modern Slavery and options for reporting of any suspected violations.

2. Scope

The Policy applies to all individuals working at all levels of the Company, including directors, officers, managers, employees (whether temporary or permanent), and contractors. It applies to all business dealings and transactions.

The Policy also supports the Group-wide Supplier Code of Ethics, to which all third parties working on the Company's behalf are expected to adhere. To that end, any third party working on the Company's behalf - including all relevant suppliers, contractors and business partners – are expected to put in place appropriate measures to comply with the principles of this Policy.

The Policy extends to all types of Modern Slavery as defined in section 3 below, recognising that this could affect employees or workers across our supply chain.

3. Modern Slavery Defined

Modern Slavery is is an overarching term used to describe slavery and forced labour in its various forms. In the United Kingdom it is a criminal offence.

Victims of Modern Slavery could be trafficked for different types of exploitation including:

- **Forced labour**, where the person is coerced to work under a threat of some sort of punishment. This includes forced child labour.
- **Bonded labour**, where a person is required to work to repay a real or alleged debt.

- Slavery & servitude, where a person exercises (perceived) power of ownership over another. This includes domestic servitude, where a person is subject to the power of a family member or partner.
- Human trafficking, where a person arranges or helps to transport another person into a situation of exploitation.

4. Key Principles

ScottishPower is committed to taking action across our business to prevent Modern Slavery within our activities. We will:

- undertake appropriate checks for all directly employed employees to ensure that they are eligible to work in the UK and have independent access to their relevant documents.

- only work with an authorised agency to recruit temporary or indirectly-employed workers. For these workers, we will ensure that they are also subject to appropriate and rigorous checks to ensure their security to work

- carry out appropriate risk assessment and due diligence on third parties and transactions in order to identify areas of risk in relation to Modern Slavery

- include appropriate human rights and modern slavery clauses within our contractual arrangements to ensure that human rights principles are embedded within our business operations

- avoid doing business with others who do not commit to having appropriate processes and controls in place to mitigate the risk of Modern Slavery within their business

- communicate Company-wide, with the aim of raising employees' awareness for employees of ScottishPower's approach to Modern Slavery and the Modern Slavery Statement

- provide appropriate training to all employees on the risks of Modern Slavery, including targeted training as appropriate

- set out on an annual basis the practical steps that we have taken, and which we intend to take, in tackling Modern Slavery through the Modern Slavery Statement, in accordance with the requirements of the Modern Slavery Act 2015.

5. Control, Evaluation and Review

The ScottishPower Compliance Division shall review the contents of the Modern Slavery Policy in accordance with the Compliance Policy Management Framework, as agreed from time to time with the Scottish Power Limited Audit and Compliance Committee. Such review shall aim to make sure that the Policy reflects the recommendations and best international practices in effect at that point in time.

The Compliance Division shall propose to the Board those amendments and updates that contribute to the development and ongoing improvement of the policy.

This Policy was first approved by the Scottish Power Limited Board on [4 October] 2022.

6. Further Information and Guidance

ScottishPower has adopted a number of policies which reflect our respect for Human Rights and our approach to fair and lawful labour practices, including:

- Policy on Respect for Human Rights
- Resources and Human Capital Framework Policy
- Selection and Hiring Policy
- Sustainable Management Policy

These policies are available at Governance and Sustainability System - ScottishPower.

Further information can also be obtained from the UK Home Office Modern Slavery website Modern slavery - GOV.UK (www.gov.uk)

7. Reporting A Concern

It is the responsibility of all Employees and Third Parties to report any perceived breaches of this Policy or any suspected incidences of Modern Slavery within our business activities. Any concerns relating to a breach of this Policy should be reported in one of the following ways:

- By email to the Compliance division mailbox (compliancedivision@scottishpower.com);
- Using the Ethics Helpline reporting option on the ScottishPower Employee Portal:
- In person or by email to your Compliance Officer:
    - ScottishPower Chief Compliance Officer - Pamela Mowat
    - SP Energy Networks Business Compliance Officer - June Dickson:
    - SP Renewables Business Compliance Officer - Amanda Henderson
    - Liberalised Business Compliance Officer - Sean Tierney
- Through our external third-party Speaking Out service People InTouch.
    - You can do this online at www.speakupfeedback.eu/web/scottishpower/gb or by calling 0800 169 3502.
    - In both cases use access code 45042 to identify ScottishPower.

In an active situation at a Company site which requires support, contact the Security Alarm Receiving Centre on 0141 614 6000. In an emergency where there could be imminent danger to someone's welfare always call **999.**

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be incorrect. **We are committed to ensuring no one suffers any form of retaliation by reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains.**