

# Policy on Modern Slavery

ScottishPower Compliance Unit

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## Version Control

| Version | Author                 | Purpose                                                      | Date          |
|---------|------------------------|--------------------------------------------------------------|---------------|
| 1.0     | SP Compliance Division | Final approved version                                       | October 2022  |
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| 2.1     | SP Compliance Unit     | Annual review and update of content.                         | November 2024 |
| 3.0     | SP Compliance Unit     | Final approved version.                                      | December 2024 |
| 3.1     | SP Compliance Unit     | Updated contact details for reporting a concern.             | May 2025      |



## 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 its 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.
- 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 & Ethics 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 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 acting 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 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 ScottishPower Modern Slavery Statement, in accordance with the requirements of the Modern Slavery Act 2015.

## 5. Control, Evaluation and Review

The ScottishPower Compliance Unit is responsible for this Policy and shall review the contents in accordance with the frequency set out in the Compliance Policy Management Framework. Such review shall aim to ensure that the Policy reflects the recommendations and best international practices in effect at that point in time. The ScottishPower Compliance Unit shall propose to the Scottish Power Limited Board those amendments and updates that contribute to the development and ongoing improvement of the policy.



This Policy was last approved by the Scottish Power Limited Board on 10 December 2024.

## 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. These policies are available at [Governance and Sustainability System - ScottishPower](#):

- Policy on Respect for Human Rights.
- People Management Policy.
- Diversity and Inclusion and Anti-Harassment Policy.
- Selection and Hiring Policy.
- Sustainable Management Policy.

Further information can also be obtained from the UK Home Office Modern Slavery website at <https://www.gov.uk/government/collections/modern-slavery>

## 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. If you feel comfortable to do so, you can discuss your concern with your line manager in the first instance. You or your line manager should report any concerns relating to a breach of this policy in one of the following ways:

|                                                                        |                                                                                                                                                                                                   |
|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>In person or by email to your Business Compliance Officer (BCO)</b> | The ScottishPower Compliance Unit structure and contact details are available to employees on the ScottishPower Employee Portal ( <a href="#">here</a> )                                          |
| <b>Through the Ethics Helpline reporting tab</b>                       | Available on the ScottishPower Employee Portal ( <i>a guide for ScottishPower employees on How To Report can be found <a href="#">here</a></i> )                                                  |
| <b>By email to the Compliance Unit mailbox</b>                         | <a href="mailto:compliance@scottishpower.com">compliance@scottishpower.com</a>                                                                                                                    |
| <b>Access our Speaking Out Channel on the ScottishPower website</b>    | <a href="#">Speaking Out Channel - ScottishPower</a><br><a href="https://www.scottishpower.com/pages/speaking_out_channel.aspx">https://www.scottishpower.com/pages/speaking_out_channel.aspx</a> |

In an active situation at a Company site which requires support, contact the Security Alarm Receiving Centre on 0141 614 6000.

In 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.