



2024 Modern Slavery Statement

June 2025

About our statement

This is ScottishPower's Modern Slavery Statement ('the Statement') for the financial year ending 31 December 2024 in accordance with s54 of the Modern Slavery Act 2015. Scottish Power Limited is the UK parent company of the ScottishPower group ('ScottishPower'). This is our ninth annual Statement and it applies to all companies within the ScottishPower group that meet the reporting criteria specified in the Modern Slavery Act. A full list of the companies that this statement applies to can be found on page 17.

All of ScottishPower's previous Modern Slavery Statements can be found at [ScottishPower's Modern Slavery Statement - ScottishPower](#)

Approval

This Statement sets out ScottishPower's overall approach to combatting Modern Slavery in our operations as well as any developments to that approach in 2024. It reaffirms that we are fundamentally opposed to Modern Slavery in all areas of our business.

The Board of ScottishPower has been briefed on the Modern Slavery Act 2015, and in respect of how ScottishPower has responded to the legislation since it was enacted. We consider that the measures highlighted in this Statement, coupled with our overall approach to ethics and employee and supplier engagement, are helping to reduce the risk of Modern Slavery taking place across ScottishPower and our supply chain. This Statement was approved by the Scottish Power Limited Board of Directors on 30th April 2025



Keith Anderson
Chief Executive Officer,
Scottish Power Limited
Glasgow, 30th April 2025

What is Modern Slavery?

Modern Slavery is an umbrella term that covers various forms of slavery and human trafficking.

Slavery involves depriving a person of their freedom and exploiting them for personal or commercial advantage. This can occur through an individual being unable to escape their situation, living in fear of either themselves or loved ones being punished if they don't comply, or working in conditions which do not meet legal standards.

Human trafficking includes recruiting, transporting, or transferring people between locations, for the purpose of exploitation.

Our statement

The Statement considers ScottishPower's actions in six key areas:

- Organisational structure, business, and supply chains
- Policies and procedures
- Due diligence
- Risk management
- Communication and training
- Measuring effectiveness

Action taken in 2024

As part of our programme of action to address Modern Slavery risks within our business, we have retained and built on much of the action commenced in 2023, including:

- We maintained a number of policies that are designed to protect and strengthen Human Rights within the organisation, including our Code of Ethics and Modern Slavery Policy.
- All individuals recruited by ScottishPower are subject to various pre-employment checks.
- Remain accredited as a Living Wage employer by Living Wage Scotland.
- We use a single approved agency for agency for short term workers to ensure that workers are not required to make payments to the agency for work, and also that the agency adheres to the principles of our Supplier Code of Ethics.
- Iberdrola retained the Sustainable Purchasing Strategy certification, supporting this ScottishPower's procurement process is ISO 9001 accredited and is designed to support ScottishPower in meeting its sustainability and ethical goals.
- All new ScottishPower suppliers are subject to a Compliance onboarding screening process, and are screened daily, with red flags followed up by the Compliance Division.
- Iberdrola maintains a Human Rights risk map, which assesses Human Rights risks in each country, and ScottishPower maintain a Compliance Risk Assessment which includes the Impact, Probability and Criticality of Modern Slavery risks.
- Supported the delivery of social audits for key suppliers to verify "in situ" good practices previously declared by suppliers.
- Introduced a new Speaking Out toolkit to support reporting of concerns and make the process more accessible.
- Provision of Code of Ethics training to employees.
- Membership of the Slave Free Alliance and the Institute of Business Ethics, to benchmark best practice and promote high standards.



In addition, as part of the Iberdrola Group, we have:

- Contributed to a multi-disciplinary Working Group, to review and follow up on the issue of forced labour in the solar panel supply chain.
- Retained the Sustainable Purchasing Strategy certification, being one of the first companies to do so. This certification recognises our integrated focus on sustainability throughout the value chain and confirms that the Group's purchases have the greatest positive social, environmental and economic impact
- Ensured our global human rights risk map to analyse country risk remains fit for purpose in relation to modern slavery risk
- Updated the Code of Ethics and the General Terms and Conditions, ensuring a focus on the application of Human Rights clauses to critical suppliers for the company and/or those with a higher level of risk in terms of human rights.
- Further developing the systems to assess the specific human rights risk level associated with the different suppliers.
- Strengthening the system of social audits and traceability implemented by the Group
- Updating the internal action procedure in the event of identification of non-conformities.

Organisational Structure, Business and Supply Chains

About ScottishPower

ScottishPower is part of the Iberdrola group ('Iberdrola'), one of the world's largest integrated utility companies and a world leader in wind energy. Iberdrola aims to be a leader in sustainable energy and ethical conduct and in 2024 was again rated as one of the World's Most Ethical Companies by the Ethisphere Institute.

Our businesses

ScottishPower operates in the United Kingdom through the following business sub-holding companies: Scottish Power Energy Networks Holdings Ltd (SPENHL), ScottishPower Renewable Energy Ltd (SPREL) and Scottish Power Retail Holdings Ltd (SPRHL).

These business companies sit within Scottish Power Limited, which has principal responsibility for the formulation and implementation of ScottishPower Strategy.

Each of the business sub-holding companies have their own boards of directors who hold decision-making responsibility for operational business management, ensuring appropriate business separation safeguards are observed. Policies and procedures approved by the Scottish Power Limited Board of Directors will be adapted and adopted by the sub-holding businesses, as appropriate for their business area. This ensures that each business has responsibility for its own activities and strategy, while operating in accordance with the Purpose and Policy requirements established for the ScottishPower group.

The three divisions operated by the ScottishPower group are Energy Networks, Renewables and Customer Business (incorporating energy Retail and Wholesale activities) and their activities include:



Energy Networks is responsible for three regulated electricity network businesses in the UK. These businesses are 'asset-owner companies', holding the regulated assets and electricity distribution and transmission licences of the Group, and are regulated monopolies. They own and operate the network of cables and power lines transporting electricity to around 3.5 million connected customers in the Central Belt and South of Scotland, Cheshire, Merseyside, North Shropshire, and North Wales.



Renewables is responsible for the origination, development, construction and operation of renewable energy generation plants, principally onshore and offshore wind, with a growing presence in battery storage and solar. Renewable production's ambitious growth plans include expansion of our existing onshore portfolio harnessing a pipeline of over 18 gigawatts ("GW"), investing in new large-scale onshore wind, solar deployment and Battery Energy Storage Systems ("BESS"). The UK offshore pipeline stands at just over 10 GW, with a 3.3GW offshore wind pipeline at our Easy Anglia Hub, and 7 GW of early development potential in our three ScotWind offshore projects. The division has over 40 operational wind farms, including our offshore windfarms West of Duddon Sands and East Anglia ONE, and produces 3 GW of clean, renewable energy which supplies the equivalent of more than two million homes. Renewable production is also investing in hybrid energy parks by adding batteries and solar to our onshore wind farms where viable in order to maximise output at our existing sites.



Our **Customer business** is responsible for the supply of electricity and gas to over four million domestic and business customers throughout the UK, including customer registration, billing and handling enquiries in respect of these services. The division is also responsible for the associated metering activity, and the smart meter installation programme, and for managing the Group's smart solutions activities including the installation of heat pumps and the UK's first national heat pump annual service plan and Heat Pump tariff, solar panels, batteries, and electric vehicle ("EV") charging and tariff. Scaling up green hydrogen production is a key strategic focus for the Iberdrola Group, with the aim of producing more than 350,000 tonnes of green hydrogen a year by 2030. Our Green Hydrogen department is aligned with the Iberdrola's ambitions in this growth area with 500 megawatts ("MW") of green hydrogen in development across the UK. The division is also responsible for managing the Group's exposure to the UK wholesale electricity and gas markets and the optimisation of gas storage.

Our workforce

At ScottishPower we believe that the well-being of people is a strategic cornerstone. That is why we continue to champion a model that enhances the employee experience every day, in both their professional excellence and their quality of life.

Our businesses operate across the UK, and we have a skilled workforce throughout, many of whom have specialist talents and abilities, valued in our commercial and technical environment. We have a variety of supportive employment policies and are fully compliant with minimum wage legislation. In 2024, ScottishPower was pleased to remain accredited as a Living Wage employer by Living Wage Scotland. The Real Living Wage is a voluntary UK wage rate which is set by the Living Wage Foundation each year to reflect the cost of living based on a basket of goods and services. This is higher than the UK Government's National Living wage. This also extends to our main contractors, requiring them to ensure they pay a Living Wage to workers acting for ScottishPower.

Our recruitment programme is designed to ensure equal opportunities, compliance with local legislation, our corporate diversity and inclusion policy and practices (which are aligned to international best practices) and that all our people have the appropriate rights to work.

Background and eligibility checks can help to identify cases where workers may be at risk of human trafficking or modern slavery. All individuals recruited by ScottishPower are subject to employment checks prior to the employment contract being finalised. We check eligibility to work in the UK and conduct pre-employment background checking (this includes address and employment verification, basic disclosure check, credit check, civil litigation check and media search). For a small number of roles additional checks of educational/professional qualifications, international criminal/credit check and directorship search may be conducted as needed. Records of eligibility checks are retained on employee HR records.

Due to the diverse nature of our business activities, our core employee base is supplemented by i) agency workers for short term or specialist roles, as needed from time to time; and ii) our third-party suppliers, for products and services required to support our business activities.

Agency or short-term workers must be recruited through a named approved agency, who are responsible for carrying out the same checks as for directly recruited employees. Using a single approved agency means that we can ensure that workers are not required to make payments to the agency for work and also that the agency adheres to the principles of our supplier Code of Ethics.



At the end of **2024** ScottishPower employed just over **6,500 employees** across the UK

Our Supply Chain

As with many large organisations, ScottishPower uses a complex supply chain to deliver our supply needs, across a variety of industries and countries. Our supply chain supports: the generation, distribution, transmission and supply of electricity and the supply of gas; domestic energy services such as boiler care, electric vehicle chargers and energy efficiency measures; and the general resourcing and administration requirements of a large organisation. Due to the diverse nature of these activities, we use a combination of directly employed professionals and third-party suppliers to deliver particular expertise.

We recognise that we have a valuable opportunity to identify potential instances of Modern Slavery in our supply chain at

an early stage, through our purchasing activity. All purchases from third-party suppliers are procured under our global Procurement Policy, which has clear and direct links to our Policy in Respect of Human Rights and Supplier Code of Ethics. All new ScottishPower suppliers are subject to a Compliance onboarding screening process, and thereafter they are subject to daily compliance screening on Dow Jones, with red flags followed up by the Compliance Division.

Depending on the nature of the contract, our contractors may use specialist suppliers to fulfil elements of their contracts with ScottishPower and therefore broaden our supply chain. Where this is the case, suppliers are expressly responsible for ensuring that their suppliers meet ScottishPower's required standards.



At the end of **2023** we had contracted directly with **2,974** third party suppliers, registered in over **30 countries**.

Policies and Procedures

As part of the Iberdrola Group (the "Group"), we maintain a number of policies that are designed to protect and strengthen Human Rights due diligence 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
- recognising the 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.

Figure 1 below illustrates the policy framework that was in place in ScottishPower across 2024:



Figure 1: ScottishPower Policy Framework 2024 – note, this Policy framework was amended in March 2025

Our Code of Ethics

Our [Code of Ethics](#) was in force across the duration of 2024. It represents who we are and how we act as a company. It contains a set of behavioural guidelines designed to ensure ethical, responsible conduct by all employees so that their actions are also governed not only by scrupulous compliance with all laws and regulations but also by solid, generally accepted ethical principles

We also maintain our [Supplier Code of Ethics](#), which all suppliers are required to agree to when submitting a tender response to ScottishPower (and which would then form part of any new contract). As part of the supplier registration process, suppliers are also asked to provide details of their own code of ethics or conduct.

Article B.4 of the Code of Ethics reaffirms the commitments made in the Policy on Respect for Human Rights, and Article A.2, requires all employees and suppliers across the group to recognise these principles and to adhere to them in all of their activities on behalf of ScottishPower.

Human Rights Policies

As part of Iberdrola, ScottishPower remains publicly committed to the United Nations (UN) Sustainable Development Goals (SDGs). Several of the SDGs are relevant to Modern Slavery including Goals 8 and 10 (Decent work and economic growth; Reduce inequalities) and Goal 16 (Peace, Justice and Strong Institutions). Iberdrola also recognises and respects 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, and the Universal Declaration of Human Rights.

Working in conjunction with our colleagues across Iberdrola, we are committed to playing our part towards meeting them and to aiding our suppliers in contributing to these aims. Our commitment to this is reflected in ScottishPower's Sustainable Development Strategy (Action 2030: Powering a sustainable future).

In line with the framework outlined above, ScottishPower has adopted the social commitment policies of the Iberdrola Group which reflect, within the framework of our sustainable development strategy, the Group's respect of human rights, the development of professional relationships based on inclusion and a sense of belonging, all of which are essential to the promotion of equal opportunity and non-discrimination in the management of people.



Modern Slavery Policy

In 2024, we carried out an annual review of ScottishPower's Modern Slavery Policy, which was subsequently approved by the ScottishPower Limited Board of Directors and published to employees and externally on our website.

The Policy is designed to consolidate the principles set out within the Human Rights section (above) and detail how they are applied within ScottishPower. The Policy applies to all individuals working at all levels of the Company and it applies to all business dealings and transactions.

The Policy also supports the Group-wide Supplier Code of Ethics, which requires that, any third party working on the Company's behalf - including all relevant suppliers, contractors and business partners must adopt appropriate measures to prevent Modern Slavery and forced labour within their own organisations.

For ScottishPower employees, the Policy is supported by the ScottishPower Compliance and 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.

The 2024 review concluded that the Policy remains fit for purpose and no update was made to the scope, principles or intent of the policy.



Speaking Out

ScottishPower actively encourages any employee or third party that has any concerns about its ethical working practices to report those concerns, and we maintain a number of different routes to support that reporting.

Each of the routes available provide an independent, confidential method for ScottishPower employees, suppliers, and their employees to report concerns of any conduct believed to be in breach of the Supplier Code of Ethics or of any other wrongful, criminal, or illegal conduct, directly to ScottishPower.

In 2024 we launched a new Speaking Out toolkit for our employees, which was designed to provide a more user-friendly, accessible and tailored source of information and guidance to employees on Speaking Out and the types of issues -

including Modern Slavery - that they should report directly to the Compliance Unit. The toolkit also now includes a section targeted at third parties, to support the raising of concerns they perceive in the course of their work with ScottishPower.

Additionally, the Modern Slavery Policy highlights specific routes for reporting should an individual identify a potential case of Modern Slavery. The Policy emphasises our commitment to ensuring that no-one will suffer retaliation or harm as a result of a report made in good faith, whether that report is accurate or not.

Due diligence processes

Procurement of goods and services from Third Parties

At ScottishPower not all of our suppliers are exclusive to us and many may be used at a global Iberdrola level. The ScottishPower purchasing strategy and approach is therefore directly aligned to the global Group framework, to ensure consistency and the maintenance of clear standards in purchasing activity across the Iberdrola group. This framework includes special emphasis on compliance with the ethical commitments of the Iberdrola Group, by employees and suppliers.

In 2024, Iberdrola retained the Sustainable Purchasing Strategy certification, in recognition of our approach to integrating and promoting sustainability throughout the company's value chain. With this recognition, AENOR certifies that the purchasing processes carried out by the Iberdrola group have the greatest possible positive environmental, social and economic impact throughout the life cycle of the service of product.

Further information on the Iberdrola procurement and supplier management approach 2023- 2024, including

awards related to the sustainability and ethical credentials of the process, can be found [here](#).

Supporting this, ScottishPower's procurement process is ISO 9001 accredited and is designed to support ScottishPower in meeting its sustainability and ethical goals.

We recognise that we have a valuable opportunity to identify potential instances of Modern Slavery in our supply chain at an early stage, through our purchasing activity. All purchases from third-party suppliers are procured under our global Procurement Policy, which has clear and direct links to Policy in Respect of Human Rights and Supplier Code of Ethics.

A core element of the Purchasing process is the Human Rights Due Diligence System, which is aimed at identifying, preventing and mitigating human rights impacts in both our own operations and the wider supply chain. To this end, a core set of supply chain management measures are in place across ScottishPower processes, following the approach of the Iberdrola Group. These measures remained in place in 2024:

Initial third-party registration	Initial risk assessment on modern slavery based on geography, economic sector, existence of supplier policies, any relevant concerns or incidents. This reflects the Iberdrola Human Rights risk map, which has been updated in 2023 to analyse country risk in relation to Modern Slavery.
Bid	Supplier confirms compliance with the Supplier Code of Ethics and Social Responsibility Policies. General clauses related to Human Rights in the Terms and Conditions of Contracting activity.
Supplier Assessment and Selection	360° Sustainability Self-Assessment of Suppliers (>€700 k) Suppliers' Sustainability improvement Plans.
Contract Signing	Modern Slavery clauses agreed in contracts Further more detailed clauses on Forced Labor required in contracts for certain higher risk supplies
Contract Term	Sustainability Audits (documental audits) Traceability audits in some PV supplies Access to Speaking Out mechanisms for suppliers and contractors Termination of the contract if breaches are not managed.

Figure 2 on page 12 provides more detail on the core elements of the ScottishPower Purchasing process, which has been designed to incorporate the Iberdrola Group's principles for the protection of Human Rights.

Additionally, in 2024, Iberdrola began development of its Supplier Hub, which aims to strengthen management

Compliance Due Diligence in the Purchasing Process – Initial Third Party Registration - Onboarding screening

All new ScottishPower suppliers are subject to a Compliance onboarding screening process using our Dow Jones risk assessment tool to identify and resolve potential compliance risks associated with suppliers and their connected parties, before they register with ScottishPower. This includes any risks or issues related to Modern Slavery.

The onboarding process includes a set of Modern Slavery diligence questions that new suppliers are required to answer. These questions are designed in particular to highlight suppliers who have operations in countries across the globe with a higher prevalence of Modern Slavery and to assess the steps that the suppliers have taken to resolve or address that risk.

Any issues identified through those questions are reviewed by the SP Compliance Unit and discussed with the relevant business owners, in order to assess the risk and agree any appropriate mitigating actions, before the supplier onboarding process can continue.

The Compliance Unit will assign a risk rating for that supplier, based on the output of the assessment and any agreed mitigating actions. If the risk is considered higher than normal, the Compliance Unit will continue to monitor future transactions intended to be entered into with that third party. Suppliers considered as critical Modern Slavery risk are blocked in the systems, which prevents the execution of any transaction or payment in relation to them, preventing them from participating in procurement processes

Similarly, any supplier that has not completed the Registration form (and had any identified risks appropriately mitigated) will not be eligible to take part in any tendering or contracting activity with ScottishPower.

Not only are suppliers subject to screening for any potential human rights or modern slavery issues at the point of registration with ScottishPower, but also across the life of their contract with ScottishPower through daily screening on Dow Jones, with any red flags reviewed and followed up by the Compliance Division. Additional due diligence will be used in some higher risk contracts, with specialist third party due diligence engaged in likely areas of risk when needed.

capabilities and interaction with suppliers, simplifying the recruitment of new suppliers and allowing a comprehensive view of the performance and risks inherent in the supply chain. This tool will benefit ScottishPower's ability to better review and manage its supply chain. Final decisions are expected to be made on this tool in 2025

Supplier Selection and Contracting

In addition to onboarding due diligence, additional diligence will be carried out by a member of the Compliance Division as part of our purchasing process for higher risk contracts. This includes all contracts over a defined value threshold. The following examples of Modern Slavery risk will be considered as part of the contracting process:

- The use of suppliers in countries across the globe with the highest prevalence of Modern Slavery.
- Contracts with a significant proportion of low skilled workers to deliver the services.
- Products with a high reliance on labour or outsourced manufacturing (clothing, electronics, minerals agriculture etc.).
- Contracts which fall between legal jurisdictions (offshore maritime laws).



Our standard contract terms for the purchase of equipment, material, works and services, include specific supplier corporate social responsibility clauses which are based on the UN Universal Declaration of Human Rights, the conventions of the International Labour Organisation, the principles of the Global Compact, and compliance with the Code of Ethics. For fuels, the company aims to include these clauses as new contracts are signed.

During the term of the contract, the supplier must allow ScottishPower to assess its compliance with the principles established in the contracts where it considers it appropriate, with termination rights for ScottishPower in the event that non-compliance is detected and corrective plans are not adopted.

All major suppliers of general goods and equipment and services are assessed on this basis, taking into account their material risks in relation to human rights and potential negative social impacts. These risks are mitigated and managed through the quality processes in place and the regular audits carried out by each business unit. In 2024, Iberdrola continued its campaign of social audits of key suppliers, targeting a further 36 key suppliers. At year-end, 28 social and sustainability audits had been carried out, with the remainder in progress. The results of these two campaigns were positive, as the independent auditors were able to verify “in situ” good practices previously declared by suppliers, with minimal deviations..

Figure 2: Key steps in the procurement process:

Stage 1

The engagement and selection of suppliers

Our vendor registration platform (GoSupply) is used across the Iberdrola Group and acts as a single, consistent point of registration for all third parties wishing to become a supplier of ScottishPower. All third parties registering in GoSupply are required to confirm acceptance of our Supplier Code of Ethics, as well as provide evidence of their Sustainability credentials, including Human Rights and ethical behaviour. Those third parties registering at the highest level are required to complete a questionnaire to determine an Iberdrola score against three pillars – Environmental, Social & Governance. This score is then monitored to encourage all third parties to reach an acceptable threshold to be considered for contract awards within the Group.

Additionally, checks integrated within our vendor management (SAP) system are applied to all new suppliers, and potentially higher risk suppliers are automatically flagged to Compliance for further review before they are accepted as a supplier. A third-party screening tool (“the tool”), is used to screen against media activity, regulatory and law enforcement updates, and a variety of financial and risk information, to provide up to date intelligence on organisations and relevant individuals. This allows a more consistent view of new suppliers, enabling ScottishPower to identify any human rights issues or ‘red flags’ and advise the business on any issues and controls they should consider in taking the supplier forward.

Stage 2

The contracting process (tendering)

Once suppliers have been pre-qualified to proceed to each tender, as a key part of the contracting process they are required to agree to terms requiring them to operate ethically and in compliance with the Supplier Code of Ethics and with relevant legislation, including in respect of Modern Slavery, as well as their ethical obligations in relation to the recruitment, management and compensation of employees. Suppliers are also required to ensure that any sub-contractors are also obliged to meet these obligations. All suppliers are also provided with links to the Supplier Code of Ethics.

Stage 3

The ongoing management of suppliers

Active suppliers are screened daily by the tool daily to identify any potential new issues with existing suppliers which require review or action.

Once the contract is signed, responsibility for the implementation and ongoing management of the supplier reverts to the relevant business manager. The scale and type of monitoring will vary depending on the nature of the supplier’s work for ScottishPower. Suppliers are required to manage their own sub-contractors and we will ask for evidence of how these third parties are being managed, either as part of ongoing monitoring and reporting, or on an ad-hoc basis if specific concerns are identified.

Risk Management

At Group level, Iberdrola maintains a Human Rights risk map, which assesses the specific risks associated with various categories of Human Rights in each country that the Group operates. This risk map specifically considers forced labour and Modern Slavery risk at a country level.

ScottishPower maintains a Compliance Risk Assessment, which includes Modern Slavery risks. The Risk Assessment exercise includes an assessment of the Impact, Probability and Criticality of Modern Slavery risk factors affecting ScottishPower. This was last updated in 2023, which concluded that areas of perceived modern slavery risks within our business and supply chain primarily relate to the use of third-party suppliers in parts of the world where there are specific concerns around forced labour. Renewable and energy services technologies present a risk factor due to the materials and equipment used (such as in solar panels) and offshore windfarm construction is a particular risk area where some work is carried out by overseas vessels and crews. Existing controls were assessed as appropriate and ongoing discussions have been held with key business areas on the scope and management of those risks. No further change was made to this assessment in 2024.

In 2024, ScottishPower participated in a risk assessment exercise led by Iberdrola Group Compliance, to identify, assess and mitigate the compliance risks associated with key contractors having access to ScottishPower systems across the Group companies. This included an understanding of the activities being carried out by contractors and an assessment of any additional risk presented by those contractors, including in relation to Modern Slavery. Over 9,000 individual contractors were reviewed across the extent of ScottishPower’s operations. No new Modern Slavery concerns were identified for ScottishPower contractors through this exercise.

In addition, as part of our daily supplier screening programme, we continue to measure adverse media reports through our screening tools and this provides an additional control in identifying any concerns, including those relating to modern slavery.

More broadly, in 2024 an ambitious multi-year objective to reinforce the Human Rights Due Diligence System in the Supply Chain, was developed at Iberdrola Group level, involving reviewing existing processes in light of requirements of the Corporate Sustainability Due Diligence Directive (CSDDD) and recently approved EU Forced Labour Regulation. This has resulted in the identification of activity to be completed over the next 2 years in order to respond to the requirements of the CSDDD, including: updated requirements for Investment Decision documents

incorporating enriched supplier information; updates to the Code of Ethics and the General Terms and Conditions, ensuring a focus on the application of Human Rights clauses to critical suppliers for the company and/or those with a higher level of risk in terms of human rights and Modern Slavery; further developing the systems in place to assess the specific human rights and modern slavery risk level associated with the different suppliers; strengthening the system of social audits and traceability implemented by the Group; and updating the internal action procedure in the event of identification of non-conformities. The work to develop these objectives commenced in 2024 and to identify any other risks areas for review, and will continue til 2026.



Communication & Training

Training and awareness

In 2023, we launched a new online Code of Ethics course, which reinforces the core messages and requirements of our Code of Ethics, Compliance Policies, Speaking Out arrangements and key contacts. The majority of SP employees had completed this course by end 2023, therefore the focus in 2024 was on non-completers and new employees as part of our onboarding training. At the end of 2024 5% of employees (including new starts) had not completed relevant compliance training in the last 3 years. This will be followed up in 2025.

In the third quarter of 2024 we completed the annual review of our Compliance Policy suite, including the Modern Slavery Policy. This was approved by the Scottish Power Limited Board. A company-wide communication was issued highlighting the updated policies, along with an online article for employees, explaining more about the purpose and content of the Modern Slavery Policy, along with our other Compliance Policies.

Stakeholder Engagement

At Iberdrola Group level, a multi-disciplinary working group has been established, in order to monitor forced labour specifically within the solar panel supply chain and identify actions to address those risks. Across 2024 this group met to facilitate collaboration across the Sustainability teams within the various Group businesses, with an overall objective to improve Human Rights due diligence activities, including the risk of Modern Slavery within our supply chain.

At ScottishPower, a senior-level Sustainable Development Committee has been convened to provide oversight, co-ordination and engagement on sustainability and human rights initiatives across all ScottishPower business areas. The Committee met four times in 2024.

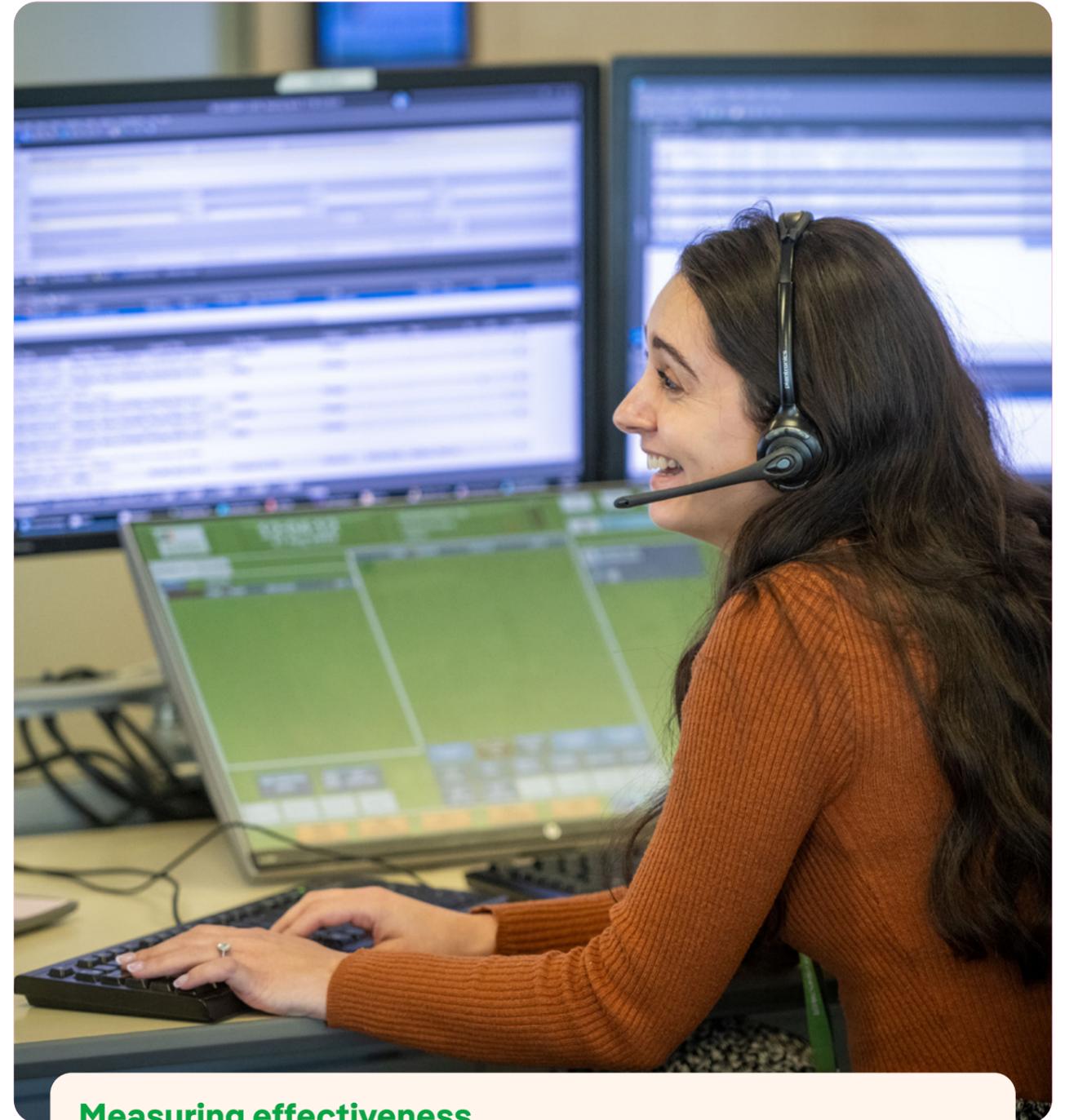
External Engagement

We believe that external memberships are important in helping to foster opportunities for collaboration with colleagues across industry on steps to eradicate Modern Slavery across the utilities sector and providing the expertise to help further inform our programme.

Scottish Power remained a member of the Slave Free Alliance in 2023. Slave-Free Alliance is a limited company that is part of the Hope for Justice Charity, working in collaboration with businesses to enhance and support their wider framework around ethical trade, sustainability, compliance, corporate social responsibility, and human rights. The core objective of Slave-Free Alliance is to support businesses to work towards a slave-free organisation and supply chain.

ScottishPower is also pleased to continue our membership of the Institute of Business Ethics, an organisation which works to promote high standards of business behaviour based on ethical values and which provides high level guidance on Modern Slavery, alongside other issues relevant to business ethics.

More broadly, in 2024 the Iberdrola Group remained an active member of the Solar Stewardship Initiative, holding a position on the Board of the Initiative. The Solar Stewardship Initiative (SSI) is designed to further develop supply chain transparency and strengthen confidence in how, where, and by whom products and solar components are manufactured. It will work to establish and access verifiable information on current levels of transparency, and on overall Sustainability performance standards in the solar supply chain. All solar panel providers who wish to be a member of the Initiative must be certified on the standards across their workforce, following tough social audits. The majority of large solar panel providers are involved in this initiative and have been certified through this audit process. The SSI has recently approved its Multi-Stakeholder Governance Terms of Reference and is in the process of seeking non-industry representatives (civil society, institutional stakeholders and independent experts) to diversify its stakeholders. Diverse stakeholders lead to more comprehensive and sustainable solutions for solar value in order to join in efforts to combat modern slavery within the solar panel supply chain.



Measuring effectiveness

The ScottishPower Compliance Unit has an independent reporting line to the Scottish Power Limited Audit and Compliance Committee (SPL ACC) and the Iberdrola Group Compliance Unit.

On a quarterly basis, the Chief Compliance Officer reports to the SPL ACC on compliance matters including activity in relation to Modern Slavery risks. This is supported by an annual report on the Effectiveness of the Compliance System across the company, including an assessment of activity undertaken in relation to the Modern Slavery compliance programme.

ScottishPower, December 2024

This statement applies to:

This statement covers those entities within the ScottishPower group that meet the reporting criteria and are therefore obliged to report under s.54 of the Modern Slavery Act 2015, or are parent companies of those entities, namely:

- ScottishPower UK plc
- Scottish Power Retail Holdings Limited
- ScottishPower Energy Management Limited
- ScottishPower Energy Retail Limited
- SP Smart Meter Assets Limited
- ScottishPower Renewable Energy Limited
- ScottishPower Renewables (UK) Limited
- ScottishPower Renewables (WODS) Limited
- East Anglia One Limited
- Scottish Power Energy Networks Holdings Limited
- SP Distribution plc
- SP Transmission plc
- SP Manweb plc
- SP Power Systems Limited

Those entities sign an adopting statement which is held at ScottishPower's offices and is available on request

ScottishPower
320 St Vincent Street, Glasgow G2 5AD
scottishpower.com

