

## About our statement

This is ScottishPower's seventh Modern Slavery Statement ('the Statement') for the financial year ending 31 December 2022 in accordance with s54 of the Modern Slavery Act 2015. Scottish Power Limited is the UK parent company of the ScottishPower group ('ScottishPower'). This Statement applies to companies within the ScottishPower group.

All of ScottishPower's previous Modern Slavery
Statements can be found at <u>ScottishPower's Modern</u>
<u>Slavery Statement - ScottishPower</u>

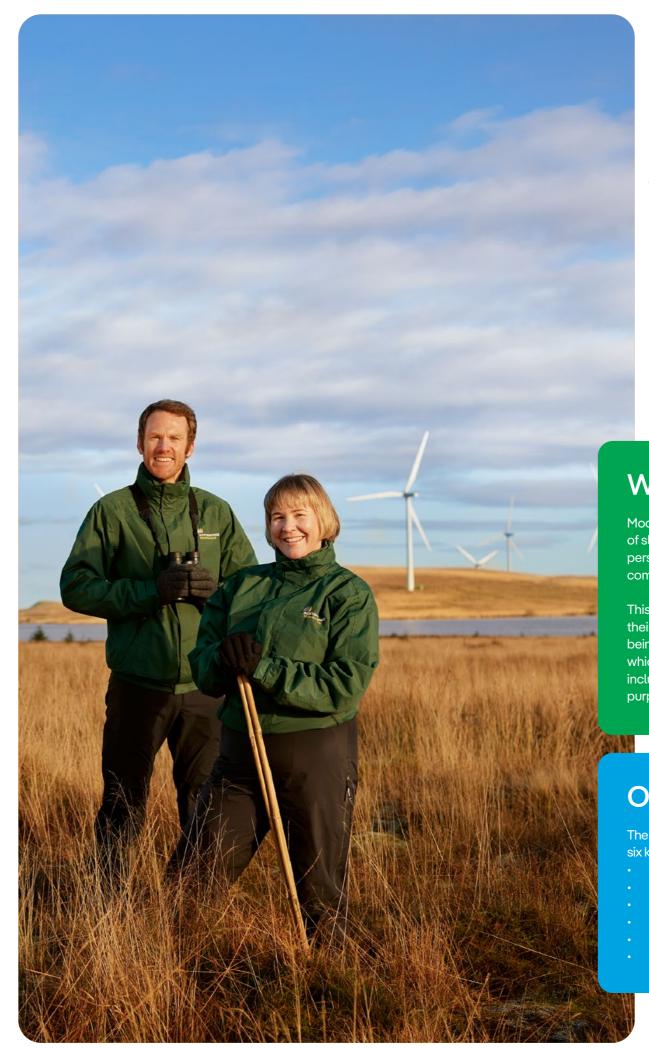
# **Approval**

This Statement sets out ScottishPower's overall approach to combatting Modern Slavery in our operations as well any developments to that approach in 2022. 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 11th May 2023.



Keith Anderson Chief Executive Officer, Scottish Power Limited Glasgow, 11th May 2023



## 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 for the purpose of exploitation.

## Our statement approach

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

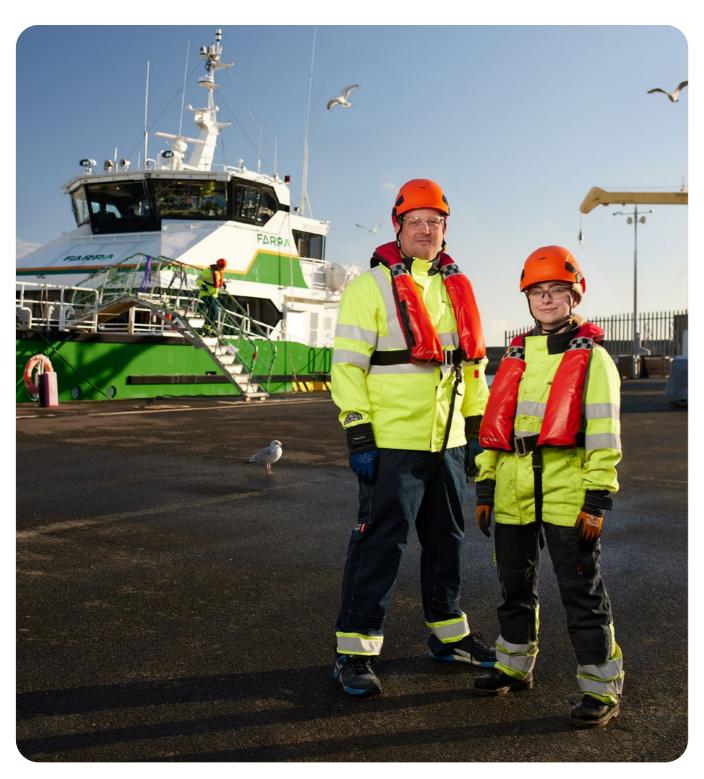
ScottishPower Modern Slavery Statement 2022

ScottishPower Modern Slavery Statement 2022

## Action taken in 2022

#### As part of our programme of action to address Modern Slavery risks within our business, we:

- Reviewed and re-instated the Modern Slavery Steering Group. The Group met 3 times across 2022, in March, May and November.
- Developed and implemented a new ScottishPower Modern Slavery Policy which was approved by the ScottishPower Limited Board and adopted at the ScottishPower sub-holding Business Boards in October 2022.
- Contributed to an Iberdrola-wide review of Modern Slavery risks and actions.



# 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 2022 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 procedure 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 Group are Renewables, Energy Networks and Energy Retail and Wholesale and their activities include:

#### Renewables:

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 emerging renewable technologies and innovations such as battery storage and solar. Renewables' ambitious growth plans include expansion of our existing onshore wind portfolio harnessing our 6.6 gigawatts ("GW") pipeline, investing in new large-scale solar deployment and innovative grid storage systems including batteries. The division operates the East Anglia One ("EAI") offshore wind farm and is developing the East Anglia Hun ("EA Hub") in the Southern North Sea off the East Anglian coast, Renewables' 41 wind farms produce over 2,800 megawatts ("MW") of clean, renewable energy that supplies around 2.1 million homes.

#### **Energy Networks:**

Energy Networks is responsible for the 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.

#### **Energy Retail and Wholesale:**

Energy Retail(also known as our Customers Business) is responsible for the supply of electricity and gas to almost five million domestic and business customers throughout the UK, including customer registration, billing, and handling enquiries in respect of these services. Energy Retail is also responsible to the associated metering activity, including the smart meter installation programme, and managing the Group's Smart Solutions activities. In 2020, ScottishPower created a hydrogen department to begin working with businesses to seek appropriate green hydrogen solutions. This is a pioneering strategic move to support the UK's efforts to achieve 'net zero' by 2050.

Energy Wholesale is responsible for managing the Group's exposure to the UK wholesale electricity and gas markets for Energy Retail and Renewables 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 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.

Our recruitment programme is designed to ensure equal opportunities, compliance with local legislation and that all our people have the appropriate rights to work.



# At the end of 2022 ScottishPower employed just over **5,700 employees** across the UK.

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 an approved agency, who are responsible for carrying out the same checks as for directly recruited employees.

## 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.

# At the end of 2022 we had contracted directly with **2,819 third party suppliers**, registered in **32 countries**.

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 responsible for ensuring that their suppliers meet ScottishPower's required standards.

## **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 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; and
- requiring suppliers to adhere to the same principles of business ethics and human rights.

Figure 1 illustrates the policy framework that was in place in ScottishPower in 2022:

## Corporate Purpose & Values Statement

'Sustainable Energy'

Commits ScottishPower to delivering a clear social dividend through its activities

### Code of Ethics

Confirms ScottishPower's commitment to the principles of business ethics and transparency in all areas of activity and establishes a set of principles and guidelines for conduct designed to ensure ethical and responsible behaviour.

### Corporate Policies

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
- Human Resources Framework Policy
- Hiring and Sustainability Policy
- Sustainable Management Policy
- Purchasing Policy

## Compliance and Ethics Manual

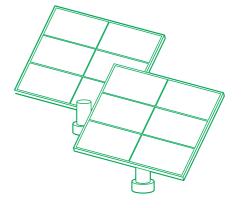
Builds on the commitments set out in the Code of Ethics and the relevant ScottishPower Compliance Policies. The Manual applies to all ScottishPower activities irrespective of the country in which business is being conducted, and to other Group employees working in the UK or on behalf of ScottishPower.

### Supplier Code of Ethics

Places high standards on all ScottishPower group suppliers, requiring them to adhere to the same principles of business ethics and human rights including ethics, labour practices, the protection of human and workers' rights, and the elimination of forced and child labour. Accession to the Supplier Code of Ethics is required of all SP suppliers

## **NEW for 2022**

ScottishPower Modern Slavery Policy Our policy confirms ScottishPower's stance on all forms of Modern Slavery and our commitment to combatting such activity that is connected to our business.



ScottishPower Modern Slavery Statement 2022 ScottishPower Modern Slavery Statement 2022

## Our Code of Ethics

Our <u>Code of Ethics</u> 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 have in place a <u>Supplier Code of Ethics</u>, which all suppliers are required to agree to when submitting a tender response to ScottishPower (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.

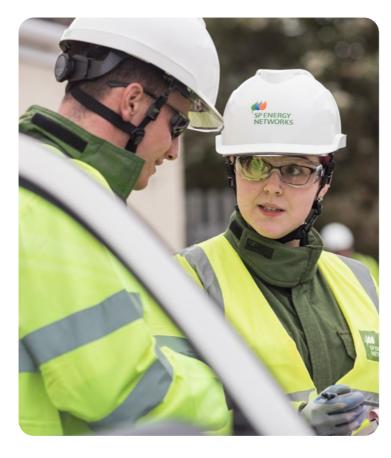
Article B.4 of the Code of Ethics reaffirms the commitments made in the Policy on Respect for Human Rights and, by virtue of Article A.2, requires all employees and suppliers across the group to recognise these principles and to adhere to them in all of their activities on behalf of ScottishPower.

Further information is available on the **ScottishPower website**.

## **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).

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) as well as throughout the business strategy for the Iberdrola group.



## Modern Slavery Policy

In 2022, we published our Modern Slavery Policy for ScottishPower, to further reinforce these existing policies. The new Policy is designed to consolidate the principles envisioned within our Human Rights Policies and detail how they are applied within Scottish Power.

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. 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.

For ScottishPower employees, the Policy is accompanied 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.

## Modern Slavery Steering Group

The Modern Slavery Steering Group exists to co-ordinate the delivery of ScottishPower's ongoing efforts to prevent, detect and react to Modern Slavery across the ScottishPower Group. The Steering Group reviews and implements ScottishPower's strategy for the detection and prevention of Modern Slavery across the ScottishPower Group.

In early 2022, we re-viewed the purpose, membership and Terms of Reference for this Group, with a viewe to re-invigorating it. This was successful and the Group met 3 times across 2022, in March, May and November.

## Our Compliance and Ethics Manual

In 2022 we launched our new Compliance and Ethics Manual (the Manual) for employees. The Manual supports the ScottishPower, and Group wide policies relating to ethical and compliant conduct and sets out how these policies should be applied and managed across ScottishPower.

The Manual includes a section on Modern Slavery which sets out our approach to managing modern slavery risk through onboarding and ongoing supplier management and provides employee guidance the key signs of modern slavery and how to report.

## Speaking Up

ScottishPower actively encourages any employee or third party that has any concerns about its ethical working practices to report those concerns, using a number of different routes:

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

We maintain Speaking Out Guidelines for our employees, which aim to provide supporting information for employees on Speaking Out and the types of issues - including Modern Slavery - that they should report directly to the Compliance Division.



## 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 level.

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 procurement process and supplier contracts. All third-party suppliers are procured under our Procurement Policy, which has clear and direct links to Policy in Respect of Human Rights and Supplier Code of Ethics. ScottishPower's procurement process is ISO 9001 accredited and is designed to support ScottishPower in meeting its sustainability and ethical goals.

As part of Iberdrola's commitment to sustainability, they have taken a new step forward by obtaining the Sustainable Procurement Strategy certificate awarded by AENOR, based on the ISO 20400:2017 standard, where the company's responsibility to ensure that the life cycle of each product or service has the greatest positive environmental, social and economic impact has been verified.

#### Onboarding screening process

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, inclusive of any adverse media related to Modern Slavery, with suppliers and their connected parties before they registered with ScottishPower.

In collaboration with the Global Compliance team, a new set of questions relating to modern slavery in the onboarding

process was developed in 2022. The new questions will be implemented during 2023.

Any issues identified through the onboarding process will be highlighted, by the SP Compliance Division, to relevant business owners to agree any appropriate mitigating actions. Any supplier that has not completed the Registration form 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 during their contract with ScottishPower. 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.

#### Supplier social assessment

The contracting terms of the group for purchasing equipment, material, works and services, include specific supplier corporate social responsibility clauses 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 lberdrola to review the level of compliance with the principles established in the contracts, and if non-compliance is detected and corrective plans are not adopted, the

company reserves the right to cancel the contracts.

All major suppliers of general goods and equipment and of fuel are assessed under this management approach and considering their material risks in relation to human rights and 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. This strategy has been reinforced in 2022 with a global campaign of social audits of key general goods suppliers to ensure compliance with the group's ESG criteria and to validate the supplier assessment model. By year-end 2022 a total of 42 social and sustainability audits had been carried out on the Group's main suppliers at the global level.

## 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 a 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 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.

Checks integrated within our vendor management (SAP) system are applied to all new suppliers, and potentially higher risk suppliers are automatically flagged 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. The tool is also reviewed daily, to identify any potential new issues with existing suppliers which require review or action.

## 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

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.

ScottishPower Modern Slavery Statement 2022
ScottishPower Modern Slavery Statement 2022

## Risk Management

Modern Slavery risks specific to ScottishPower are captured and tracked as part of a wider Compliance risk map. In 2022 Modern Slavery risks were incorporated within the Compliance Risk Assessment, which assessed the Impact, Probability and Criticality of risk factors affecting ScottishPower.

These risks and its associated controls were reviewed with key management personnel from business areas across the Scottish Power group. Key areas of potential risk within our business operations and supply chain were identified, along with relevant controls. This included discussion with the ScottishPower Management Committee, the Modern Slavery Steering Group, as well as other relevant senior and operational employees across the Group.

In 2022 our Risk Assessment confirmed our view 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 technology present a risk factor due to the materials and technology 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 managing emerging risks.

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

The output of the risk assessment has been used to identify opportunities for strengthening our approach further. This has been shared with the Scottish Power Ltd Audit and Compliance Committee (SPL ACC) and built into our action plan for 2023.

#### Iberdrola review of Modern Slavery

In 2022 Iberdrola commissioned a modern slavery risk assessment and gap analysis across the Iberdrola Group. The output of this exercise was presented to the ScottishPower Compliance Division at the Global Iberdrola Compliance Conference in October 2022. As a result of this external review an action plan was designed and agreed, with responsibilities and improvement actions assigned across a number of Iberdrola Group functions including Compliance, Procurement, Human Resources and ESG (Environmental, Social and Governance), While ScottishPower will broadly align with the Iberdola Group, we will consider the output of this report and adjust the 2023 Modern Slavery Programme appropriately for the UK.

# Key performance indicators to measure effectiveness of steps being taken

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

On a quarterly basis, the Chief Compliance Officer reports to the SPLACC on compliance matters including activity in relation to Modern Slavery risks.

## **Communication & Training**

#### **Training and awareness**

As part of our commitment to strengthening human rights and eradicating Modern Slavery across our business and industry we believe it is important to share knowledge and best practice. As part of the output of the Iberdrola review of Modern Slavery in 2022, it was agreed that training and awareness activity would primarily be the responsibility of the Group Environmental, Social and Governance (ESG) Team, to ensure consistent and effective communication across the wider Iberdrola Group. Accordingly, we haven't carried out any bespoke awareness-raising activity across ScottishPower in the year.

However, we continue to raise awareness more generally of our ethical and compliant business practices. Our induction programme provides training and awareness of our company values and our Code of Ethics to new employees.

In November and December 2022, we held bespoke Procurement training on our new Compliance and Ethics manual, covering the various compliance risks and considerations for our Procurement teams.

#### **External engagement**

At an Iberdrola level, the Group are part of the Solar Stewardship Initiative. The Solar Stewardship Initiative is being 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 ESG performance standards in the solar supply chain.

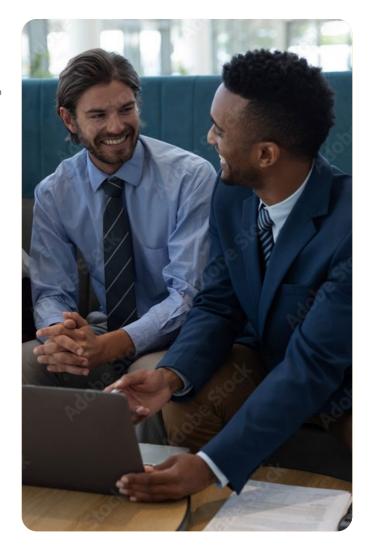
Scottish Power renewed its membership of the Slave Free Alliance in 2022. Slave-Free Alliance is a limited company that is part of the Hope for Justice Charity, working in collaboration with businesses to enhance and support their wider framework around ethical trade, sustainability, compliance, corporate 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.

We believe that sharing best practice and learning from peers and Modern Slavery subject matter experts is not only efficient but allows us to support change across the industry on best practice approaches.

In 2022, we continued to be involved in the 'Utilities against Slavery' working Group. The group was formed in 2020 and members work together to eradicate slavery and exploitation in the UK Utilities Sector and its supply chain by:

- Raising awareness to prevent the exploitation of workers and the community.
- Sharing best practice amongst the group's members.
- Collaborating to produce a co-ordinated response to reducing risks in supply chains.

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. We believe that our 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 strengthen our programme in the most effective way.



# Our Approach to Modern Slavery in 2022

While we believe that we have established a solid baseline in combatting Modern Slavery with the policies and practices already in place across ScottishPower, we are continuing to develop our Modern Slavery prevention plan and associated actions.

In our 2021 Modern Slavery Statement we said we would

Finalise our Modern Slavery Policy

Following the implementation of our Modern Slavery Policy we said we would continue to look for further development of our Modern Slavery strategy to strengthen our approach in this area.

Contribute to an Iberdrola Group-wide review of Modern Slavery controls and implementing any actions arising from that review.

Consider and develop further options for raising awareness on Speaking Out and Modern Slavery issues across relevant business areas.

#### What we delivered in 2022

Development and implementation of a new ScottishPower Modern Slavery Policy which was approved by the ScottishPower Limited Board and adopted at the ScottishPower sub-holding Business Boards in October 2022.

During 2022, Iberdrola commissioned Pinsent Masons to undertake a modern slavery risk assessment and gap analysis across the Iberdrola Group. As that review progressed, we paused our own Strategy development in order to better align with any recommendations or actions arising from the wider review.

ScottishPower Compliance will now adjust the 2023 Modern Slavery Programme plan accordingly.

In 2022 Iberdrola commissioned Pinsent Masons to undertake a modern slavery risk assessment and gap analysis across the Iberdrola Group. The output of this exercise was presented to the SP Compliance Division at the Global Iberdrola Compliance Conference in October 2022. The report assigned responsibilities and improvement actions across a number of Iberdrola Group functions – Compliance, Procurement, Human Resources and ESG (Environmental, Social and Governance).

We launched our new 'Speaking Out' service, managed by third party provider 'People in Touch', in August 2022.

An awareness campaign was communicated business wide to promote the importance of Speaking Out and to promote not only the new external provider but all routes available to employees and third parties working on behalf of ScottishPower. Plans are ongoing to further promote this key message in 2023

In 2022 we held Compliance training specifically tailored for our Procurement colleagues.

The training covered the new ScottishPower Compliance & Ethics manual and reinforced the management of compliance risks in the Procurement role, policies and procedures in place to ensure all ScottishPower companies, employees, contractors, suppliers and third parties act in accordance with our ethical standards and comply with all applicable legislation.

## 2023 Focus

In 2023 we will continue to remain vigilant and review our approach to ensure that we have appropriate mitigation in place for the risk of modern slavery.

#### Our focus in will be:

- Working with the Iberdrola Group following the review of Modern Slavery controls to implement actions arising from the review
- Further develop and promote awareness on the importance of Speaking Out and Modern Slavery issues across our business
- Enhance our third-party onboarding form to specifically include modern slavery and a number of other high-risk areas

More broadly, in 2023, Iberdrola will launch a 3 year project to review its human rights due diligence system (working with an internationally recognised consultant firm) to prepare for new and emerging regulations. Human rights in the supply chain and identification of potential impacts within new markets and business will be a key area of focus.

## This statement applies to:

In line with Home Office guidance of 12 March 2019, 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
www.scottishpower.com

