

# DIGITAL TECHNOLOGY POLICY

6 May 2025

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

In exercising these powers and within the framework of legal regulations, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, the Board of Directors hereby approves this *Digital Technology Policy* (the “**Policy**”), which respects, further develops and adapts the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* with respect to the Company.

## 1. Scope of Application

This *Policy* applies to the Company. Without prejudice to the foregoing, it includes basic principles that, in the area of the sustainable value chain, and particularly processes and activities relating to digital technology, complement those contained in the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* and, to this extent, must inform the conduct and standards-setting implemented by the other companies of the SP Group in this area in the exercise of their powers and in accordance with their autonomy.

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

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

## 2. Purpose

The purpose of this *Policy* is to establish the global framework for the governance and proactive management of processes and actions related to digital technology, understood as information and operational technology, recognising their importance as a key resource to achieve the objectives of the Company and promote the effective and efficient operation of the business processes, promoting a coordinated approach on architecture, security and potential convergences with other technologies, minimising operational and security risks, as well as ensuring the continuity thereof.

For purposes of this *Policy*, terms shall have the following meaning:

- (i) **information technology (“IT”)** is the set of physical or material components that comprise a computer or information system (“**Hardware**”) and the set of IT programmes, instructions, data and rules to execute certain tasks on a computer (“**Software**”) used for handling data, focused on the management and protection of digital information, including general communication networks, data storage and processing and management systems.
- (ii) **operational technology (“OT”)** is the Hardware and Software used to control and interact with physical industrial processes in real time, including local control systems, SCADA (“Supervisory, Control and Data Acquisition”), remote operation systems and telecommunications between them.

### 3. Main Principles of Conduct

The Company adopts and promotes the following main principles of conduct that must inform its activities related to the use of digital technology:

- (i) **Continuity of operations:** Endeavour to ensure the continuity of operations that procure the provision of services, applying standards of high availability and resilience, developing business continuity, contingency and disaster recovery plans, all in accordance with the *ScottishPower Security Policy*, the *ScottishPower Operational Resiliency Policy*, the *General Risk Control and Management Foundations of the Iberdrola Group* and the *Digital Technology Risk Guidelines and Limits* approved by the Board of Directors.
- (ii) **Operational efficiency:** Push IT and OT assets to operate with the utmost efficiency, optimising personal and material resources and their costs during the asset life cycle, based on reliable processes and technologies that secure high availability of facilities, applying the best practices and recognised standards.
- (iii) **Risk management:** Promote the proactive identification and management of risks in the devices, systems and processes associated with digital technology, ensuring that identified risks are within the thresholds deemed appropriate, particularly those related to security, natural capital, business continuity and those associated with facilities classified as critical according to applicable legal provisions. This particularly includes the planning, implementation and use of solutions that allow for the identification, protection and detection of, response to and recovery from cybersecurity risks, in coordination with the *ScottishPower Security Policy* and the *ScottishPower Operational Resiliency Policy*, as well as with the *Cybersecurity Risk Guidelines and Limits*.
- (iv) **Technological innovation and life cycle:** Promote principles for the secure design, planning, implementation, operation, decommissioning and replacement of IT and OT equipment and systems.
- (v) **Sustainability and social responsibility:** Encourage the selection of technology that optimises energy efficiency and the reduction of consumption, energy losses and greenhouse gas emissions. In particular, special attention shall be paid to ensuring that the devices, systems and processes associated with digital technology do not harm the health of professionals, users, customers and society in general.

- (vi) Training and awareness-raising: Encourage the appropriate preparation and training of planners, developers, maintenance personnel and users of digital technology, based on their profile, to understand the risks associated with this technology.

#### **4. Iberdrola Group-level Coordination: the *Digital Technology Governance Model***

A *Digital Technology Governance Model* has been established by Iberdrola, S.A. at the Iberdrola Group level in accordance with the provisions of the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group*, the *Foundations for the Definition and Coordination of the Iberdrola Group* and Iberdrola, S.A.'s *Digital Technology Policy*, setting forth the methodologies, procedures and tools required for the companies of the Iberdrola Group to have a common model that allows them to comply with the main principles of conduct.

The Corporate Services Division (or such division as assumes the powers thereof at any time), shall coordinate with the Resources and Services Division of Iberdrola, S.A. (or such division as assumes the powers thereof at any time) regarding the *Digital Technology Governance Model*.

#### **5. Implementation and Development**

For the implementation and monitoring of the provisions of this *Policy*, the Board of Directors is assisted by the Corporate Services Division (or such division as assumes the powers thereof at any time), which shall further develop the procedures required for such purpose.

The Corporate Services Division (or such division as assumes the powers thereof at any time) shall review this *Policy* at least once per year to ensure that the content thereof conforms to the ongoing progress, innovations, risks and regulatory changes that are occurring in the area.

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This *Policy* was approved by the Board of Directors of Scottish Power Limited on 6 May 2025 and adopted by the Board of Directors of Scottish Power Energy Networks Holdings Limited on 24 June 2025.