

# SCOTTISHPOWER OCCUPATIONAL HEALTH AND SAFETY 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, within the framework of legal regulations, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, and aware of the fundamental importance of the health and safety of the professionals, the Board of Directors hereby approves this *ScottishPower Occupational Health and Safety 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 occupational health and safety, 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 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 occupational health and safety, contained in this *Policy*.

## 2. Purpose

The purpose of this *Policy* is to establish the principles that must lay the foundations for the establishment of a framework for the management of occupational health and safety by the Company that provides safe and healthy conditions for the prevention of injuries and the promotion of physical, social, mental and emotional health in relation to the workplace, which are appropriate to the purpose, size and context of each organisation and to the specific nature of the risks at its facilities, as well as within its spheres of influence, all based on compliance with applicable labour laws and with good practices established at the international level, and particularly ISO standard 45001:2018 “Occupational health and safety management systems”.

### 3. Main Principles of Conduct

The Company adopts and promotes the following main principles of conduct that must inform the activities of its professionals and, to the extent possible, its value chain:

- a) Integrate occupational health and safety into decisions, business processes and work methods, such that the members of the management team, managers, technicians and professionals take full ownership of their responsibilities.
- b) Recognise the importance of the occupational health and safety of its professionals and, in general, of the people participating in the value chain, as permanent and fundamental objectives that must prevail in any circumstances, and allocate the necessary resources thereto.
- c) Promote the highest standards of occupational safety and health for the professionals participating in the value chain, especially those of the suppliers, raising awareness and establishing the controls required to mitigate the risks inherent to the work performed, in accordance with the *Occupational Safety, Health and Well-Being Risk Guidelines and Limits* (the “**Guidelines**”), requiring contractors to comply with the established safety rules and causing them to participate in the preventive culture that has been implemented, adopting international best practices in the area.
- d) Understand health as a state of complete physical, mental and emotional well-being, promoting actions that create environments and living conditions that nurture and allow the professionals to adopt and maintain healthy and positive habits to attain comprehensive well-being.
- e) Foster ongoing monitoring of the professionals’ physical, social, mental and emotional health to ensure professionals are properly suited to their jobs.
- f) Promote occupational health and safety training, competence and awareness among those participating in its value chain, especially at suppliers, strengthening a culture of excellence that promotes and improves a working environment that is consistent with the principles of dignity, mutual respect, confidentiality, cooperation and trust in the occupational health and safety (“**OHS**”) management system<sup>1</sup>.
- g) Implement proactive measures to foster safe attitudes and conduct among the Company’s professionals in general, and among the team heads in particular.
- h) Adopt the relevant preventive measures established in applicable legal provisions, which shall also be required of their suppliers.
- i) Establish consistent, relevant and quantifiable occupational health and safety indicators that involve professionals and suppliers for the businesses, promoting their commitment to the achievement thereof, in accordance with the *Guidelines*.

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<sup>1</sup> Defined as the system regarding or related to the prevention of injuries and health impairments among the professionals under the Company’s control as a result of work or in the course of work.

- j) Obtain and maintain occupational health and safety certifications in line with the strictest international standards, from the standpoint of ongoing improvement.
- k) Identify actions and opportunities to address the impacts and risks related to occupational health and safety in their direct activities and promote the identification thereof in the value chain, in collaboration with their stakeholders, through the implementation of the corresponding due diligence system and taking into account that current value chains are configured globally and that not all their links have sufficient traceability mechanisms.

#### **4. Group-level Coordination**

The Board of Directors recognises the importance of establishing a common framework for the control and management of risks associated with health and safety in the workplace through the *Guidelines* that it approves within the framework of the *General Risk Control and Management Foundations of the Iberdrola Group*.

The Occupational Health and Safety Area (or such area as assumes the powers thereof at any time) shall define a common framework for the establishment of the OHS management systems, taking the ISO 45001:2018 international standard as an essential reference, in order to secure compliance with the occupational health and safety strategy defined at the SP Group level, thereby guaranteeing commitment to the highest standards of occupational health and safety. This framework shall take into account mechanisms for better coordination in terms of monitoring and regular reporting of indicators, definition of measurable, specific and quantifiable objectives, as well as external certification processes that confirm the performance and reliability of the OHS management systems, without prejudice to the corporate autonomy of each of the SP Group's companies.

In addition, the Company's Occupational Health and Safety Area (or such area as assumes the powers thereof at any time) shall coordinate with the corresponding divisions of Iberdrola S.A. regarding its OHS management system in accordance with Iberdrola's common occupational health and safety framework, as well as on the mechanisms for review, certification and establishment of internal controls and on the identification and exchange of lessons learned and best practices.

#### **5. Implementation and Monitoring**

For the implementation and monitoring of the provisions of this *Policy*, the Company is assisted by the Occupational Health and Safety Area (or such area as assumes the powers thereof at any time), which shall further develop the coordination and assessment procedures required for such purpose.

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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.