

## SCOTTISHPOWER OPERATIONAL RESILIENCY 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 provisions, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, the Board of Directors hereby approves this *ScottishPower Operational Resiliency 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 operational resilience, 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 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 operational resilience, contained in this *Policy*.

### 2. Purpose

The purpose of this *Policy* is to establish the principles of conduct as regards operational resilience, that is, to provide a consistent, planned and coordinated response to internal or external disruptive events or incidents or crises, of any nature, that might unexpectedly involve a significant disruption or loss in the normal operations of the Company, or, to the extent applicable, of the SP Group’s companies, in order to maintain its critical business operations and processes and key structures at previously established levels, and,

if applicable, to recover operational capacity with the minimum impact and within the shortest possible period.

The *Policy* also includes the principles that the operational resiliency model of Iberdrola, S.A. and the other companies of the Iberdrola Group (the “***Operational Resiliency Model***”) must follow, and the Company confirms, as a provider of essential services and as the owner of any critical infrastructure, its firm link to excellence as regards the continuity of the business and activities, ensuring at all times that its operational resilience activities are fully in accordance with applicable legal provisions and with the Governance and Sustainability System.

The principles detailed in this *Policy* are supplemented by the Company’s Business Continuity Rule, as revised from time to time.

### **3. Main Principles of Conduct**

The Company adopts and promotes the following main principles of conduct that must inform all of its activities in the area of operational resilience:

- a) Define the continuity strategies and plans, endeavouring to ensure continuity of operational capacity and strengthening resilience, in order to minimise the impact of disruptive events or crises that might affect business continuity, to be regularly tested to improve and validate their capacities and response.
- b) Establish a comprehensive management process to lead, direct and supervise the activities of the SP Group’s companies in response to disruptive incidents or crises that might have an impact on the Company or at the SP Group level as a whole.
- c) In relation to the external and internal context, including the political environment, assess the social, economic, legal and cultural aspects, the technological and competitive context, internal capacities, resources and decision-making processes to address disruptive incidents or crises.
- d) Promote the continuous improvement of processes by measuring, evaluating and reporting on the performance and effectiveness of the results of the operational resiliency plans of the Company and at the SP Group level.
- e) Allocate appropriate resources for the performance of the duties and responsibilities corresponding thereto established in the *Operational Resiliency Model* and in the operational resiliency plans.
- f) Develop, provide and continuously improve the education and training of the staff assigned to the duties defined in the *Operational Resiliency Model*.
- g) Promote a culture of operational resilience and awareness within the SP Group, through an updated and continuous training programme.

- h) Via the *Operational Resilience Model*, implement a formal, documented and measurable management system that defines the framework of activities for the operational resiliency plans of the SP Group's companies, endeavouring to ensure continuous improvement in order to achieve its goals.

#### **4. Iberdrola Group-level Coordination: the *Operational Resiliency Model***

Iberdrola, S.A. has established and regularly reviews its *Operational Resiliency Model*, which defines the methodologies, procedures and tools required for the Iberdrola Group's companies to have the appropriate operational resilience capabilities. The *Operational Resiliency Model* allows the Company and the other companies of the Iberdrola Group to, whilst ensuring compliance with, among other things, their responsibilities as providers of an essential service such as that of electricity supply and, if applicable, the owner of critical infrastructure, to support the strategic goals of the Iberdrola Group, protect their reputation and credibility, reduce the costs of disruptive shutdowns, protect life, property and the environment, improve their capacity to remain effective during disruptions, and maintain proactive and efficient control of risks.

The Corporate Security Division (or such division as assumes the powers thereof at any time) shall, based on the *Operational Resiliency Model*, coordinate the preparation of operational resiliency plans of the SP Group with the corporate and business divisions in each area. These plans shall include details of the tasks to be carried out in each financial year within the Company and its subsidiaries, in order to effectively deploy, implement and execute the *Operational Resiliency Model*, applying it in each area for the defined scope in each case.

In addition, the Corporate Security Division (or such division as assumes the powers thereof at any time) shall coordinate with the Security, Resilience and Digital Technology Committee (or such committee as assumes the powers thereof at any time) of Iberdrola, S.A. regarding the operational resiliency plans of the SP Group.

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

For the implementation and monitoring of the provisions of this *Policy*, the Board of Directors is assisted by the Corporate Security Division (or such division as assumes the powers thereof at any time), which shall establish a procedure for regular monitoring and reporting to the governance bodies.

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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.