SCOTTISHPOWER OPERATIONAL RESILIENCY POLICY

8 July 2026

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.

As a provider of essential services and proprietor of critical infrastructure, the Company affirms through this *Policy* its firm commitment to excellence in business and operational continuity.

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

This Policy is intended to establish the principles of conduct governing operational resiliency so as to ensure that the appropriate capabilities are in place to address, in a robust, consistent, planned and coordinated manner, unforeseen adverse situations, whether internal or external, that could significantly disrupt or alter the normal operations of the Company and, to the extent applicable, those of the other companies of the SP Group. The purpose of the aforementioned response shall be to minimise the negative impact or effect of such events as far as possible, maintaining priority operations and processes at predefined levels, restoring stability as quickly as possible and drawing conclusions that make it possible to strengthen the ability to adapt and improve in response to future events.

The *Policy* also sets out the principles of the operational resiliency model of Iberdrola, S.A. and the other companies of the Iberdrola Group (the "***Operational Resiliency Model***").

As a provider of essential services and, where applicable, proprietor of critical infrastructure, the Company shall conduct its activities in the area of operational resilience in accordance with applicable legal provisions, the Governance and Sustainability System and any applicable Risk Guidelines and Limits.

The principles detailed in this *Policy* are supplemented by the Company's Security & Operational Resilience Rule, as revised annually.

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) Regularly assess and identify, for all organisations, priority processes (including all end-to-end important business services ("**IBS**")), together with their associated resources and operational resilience requirements, based on consistent standards and impact tolerances applicable to all IBS, in order to protect such processes against adverse situations that may affect them.

b) Maintain appropriate response and crisis management capabilities to deal robustly with adverse and crisis situations that may affect the Company's priority operations, and to properly manage resilience risks, in accordance with the *ScottishPower Security Policy*, the *General Risk Control and Management Foundations of the Iberdrola Group* and the *Security and Resilience Risk Guidelines and Limits*.

c) Regularly review, update and test response and crisis management plans in order to verify their effectiveness and currency, as well as to identify deficiencies and opportunities for improvement and capture lessons learned.

d) Define and implement, through the Operational Resiliency Model, a formal, recurring and measurable practice that establishes, for each level of the organisation, the appropriate operational resilience capabilities, as well as the roles, responsibilities and resources required to implement such capabilities, in accordance with market standards and generally recognised best practices in the area.

e) Regularly assess and monitor the level of implementation and effectiveness of the Operational Resiliency Model, identifying its deficiencies and opportunities, and promote its continuous improvement.

f) Promote and ensure appropriate engagement and training, skills development and awareness at all levels of the organisation in the area of operational resilience.

g) Maintain appropriate coordination among the divisions of the SP Group's companies that have been assigned powers in the areas of operational resilience, risk and internal assurance.

h) Regularly monitor the internal and external context, including evolving threats, vulnerabilities, critical dependencies, internal capabilities, and technological and regulatory, social, economic or competitive changes that may affect operational resilience.

i) Document relevant incidents, tests and drills, assess the causes and impacts of incidents, capture lessons learned and define and implement corrective actions in relation to all of the foregoing.

j) Identify relevant operational resilience stakeholders and consider their needs, expectations and requirements, in accordance with the provisions of the *ScottishPower Stakeholder Engagement Policy* and the Operational Resiliency Model.

k) Allocate appropriate resources for the performance of the duties and responsibilities established in the Operational Resiliency Model and in the operational resiliency plans.

l) Promote the integration of operational resilience into the Company's initiatives from their initial and design phases and by default, in coordination with risk management, security, cybersecurity, data protection and digital technology.

m) Promote awareness and recognition of the differences between business continuity and operational resilience, accepting the former should focus on time-based objectives regarding the recovery of critical functions, providing key data and information to support wider and more strategic operational resilience requirements. Operational resilience focuses on impact level disruption, particularly to critical customer focused end-to-end business services and processes, which may have more significant impact to financial integrity and brand reputation

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

Iberdrola, S.A. regularly reviews its *Operational Resiliency Model*, which establishes common standards and practices for conduct, coordination, monitoring and oversight, respecting in all cases the corporate autonomy of the companies of the Iberdrola Group, in order to give effect to the principles of conduct set out in this *Policy*, defining roles and responsibilities, as well as the rules, programmes, guidelines and procedures necessary for the companies of the Iberdrola Group to have the appropriate capabilities to develop the capacity for operational resiliency on a continuous, formal, consistent, systematic and measurable basis, in line with generally recognised standards and best practices in the area.

The *Operational Resiliency Model* allows the Company and the other companies of the Iberdrola Group to support the strategic goals, financial integrity and brand image of the Group, protect their reputation and credibility, reduce the impacts of disruptive events, protect life, property and natural capital, and maintain proactive and efficient control of risks, while also ensuring compliance with, among other matters, their responsibilities as providers of an essential service like electricity supply and, if applicable, as proprietors of critical infrastructure.

The Corporate Security Division (or such division as assumes the powers thereof at any time) shall, based on the provisions of 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 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 Company's Security, Resilience and Digital Technology Committee shall coordinate with the Security, Resilience and Digital Technology Committee of Iberdrola, S.A. (or such committee as assumes the powers thereof at any time) 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), through the Security, Resilience and Digital Technology Committee (or such committee 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 last amended by the Board of Directors of Scottish Power Limited on 8 July 2026 and adopted by the Board of Directors of Scottish Power Retail Holdings Limited on 16 September 2026.