

SCOTTISHPOWER POLICY ON THE RESPONSIBLE DEVELOPMENT AND USE OF ARTIFICIAL INTELLIGENCE TOOLS

17 February 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 regulations, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, the Board of Directors hereby approves this *ScottishPower Policy on the Responsible Development and Use of Artificial Intelligence Tools* (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.

The design and application of artificial intelligence tools is an essential element for the sustainable creation of value, as well as for the Group’s innovation and digital transformation strategy. The Company therefore recognises the importance of promoting the responsible use thereof, in line with its corporate philosophy and the principles that inform its corporate culture, based on ethics and the commitment to sustainability.

This *Policy* is aligned with the Recommendation of the Organisation for Economic Co-operation and Development (OECD) Council on Artificial Intelligence.

1. Scope of Application

This *Policy* applies to the Company. Without prejudice to the foregoing, this *Policy* includes basic principles that, in the area of the design and use of artificial intelligence tools, 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 empresa*) and other entities in which it assumes management, the Company shall also promote the alignment of its regulations with the basic principles regarding the design and use of artificial intelligence tools contained in this *Policy*.

2. Purpose

The purpose of this *Policy* is to establish the main principles of conduct that are to govern the design, development and application of artificial intelligence tools at the Company, defined as any automated system configured to function with different levels of autonomy and which may, with explicit or implicit aims, generate results such as predictions, recommendations or decisions, which in turn influence physical or virtual environments.

It also has the purpose of regulating the main principles of conduct that govern the responsible use of these tools by the Company's professionals in order to comply with applicable law, generally recognised guidelines and recommendations, the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group*, the *Purpose and Values of the Iberdrola Group* and the other rules that form part of the Company's Governance and Sustainability System.

3. Main Principles of Conduct

The Company adopts and promotes the following main principles of conduct that must govern its activities regarding the design, development and application of artificial intelligence tools, as well as the responsible use thereof within the Company.

a) *Principle of respect for human beings and social wellbeing*

Artificial intelligence systems will be developed and used as tools in the service of people, fully respecting human dignity and the environment, in accordance with the technological state of the art at any time and so that they benefit all human beings.

The Company shall pay special attention to ensuring that artificial intelligence systems do not harm health or safety or have a negative impact on fundamental human rights.

b) *Principle of equal opportunity and non-discrimination*

The Company shall endeavour to develop and use artificial intelligence systems so that they foster equality of access, equal opportunity and diversity, at the same time as avoiding biases with discriminatory effects (based on any condition or characteristic, like race, ethnic origin, religion, or sexual or political orientation, or unfair prejudice).

c) *Principle of culture of innovation*

The Company shall endeavour to ensure that the design, development and application of artificial intelligence tools are aligned with the innovation strategy, which seeks to keep the Company at the forefront of new technologies and disruptive business models, by encouraging a "culture of innovation" that pervades the entire organisation and promotes motivating work environments that favour and reward talent and the generation of ideas and innovative practices.

d) *Principle of privacy and respect for intellectual property*

The Company shall endeavour to ensure that artificial intelligence systems are developed and used in accordance with privacy and data protection provisions and process data that comply with established standards of quality and integrity, as well as respecting intellectual property rights.

e) *Principle of transparency*

The Company shall promote artificial intelligence systems being developed and used so that they permit adequate tracking and transparency, endeavouring to ensure that users are aware they are communicating or interacting with an artificial intelligence system, for which purpose it shall duly inform affected persons of such system's capacities and limitations, as well as of the rights that protect them.

It shall also endeavour to ensure that artificial intelligence systems comply with transparency and documentation obligations established in applicable legal provisions and in generally recognised guidelines and recommendations.

f) *Principle of security and resilience*

The Company shall endeavour to ensure that artificial intelligence systems are developed and used so that they minimise involuntary and unexpected harm and are resilient against unauthorised attempts to access them or alter their use or performance, and against unlawful and malicious third-party use, endeavouring to ensure continuity of service provision at all times.

The Company shall have hardware, technical and software security mechanisms to protect and foster the proper functioning of their artificial intelligence systems against any alteration, misuse or unauthorised access (physical or cyber), as well as endeavour to ensure the integrity of data that are stored or transmitted via those systems.

Without prejudice to the exceptions that may be established for well-founded reasons by the IT Division (or by such division as assumes the duties thereof at any time), they shall generally not develop or use artificial intelligence systems that are classified as high-risk pursuant to the standards established at any time.

g) *Principle of training and awareness-raising*

The Company shall endeavour to ensure that the developers of artificial intelligence tools receive training on aspects required to understand the risks implicit in the use of those systems, such as legal and ethical considerations, behavioural aspects and best security practices, so as to enable the end users of artificial intelligence tools to use them safely.

h) *Principle of proper and controlled use*

The Company shall endeavour to ensure the lawful, ethical and reliable use of artificial intelligence tools, and in particular shall promote the personally controlled and supervised design and use thereof.

Artificial intelligence tools that are applicable to the corporate environment must be used for professional purposes, on a device approved by the Company and in compliance with legal provisions, generally recognised guidelines and recommendations, the Governance and Sustainability System and the terms, conditions and recommendations of use applicable to each tool, in addition to strictly respecting human rights.

The Company may establish procedures for the continuous assessment and supervised use of artificial intelligence tools, in order to ensure the proper and controlled use and traceability of these tools.

i) *Principle of proportionality and harmlessness*

The Company shall endeavour to ensure that the development and use of artificial intelligence tools are aligned with the established purpose, avoiding excesses or unnecessary risks. This means that the applications of artificial intelligence must remain within reasonable limits to achieve their specific objectives, without excessive or unnecessary uses that might go beyond the established purpose.

j) *Principle of responsibility and accountability*

The Company shall implement supervisory, impact assessment, audit and due diligence mechanisms to ensure accountability with regard to artificial intelligence systems during their life cycle, in accordance with defined levels of risk.

4. Group-level Coordination

The Digital Transformation Division (or such division as assumes the powers thereof at any time), through the Security, Resilience and Digital Technology Committee, shall coordinate with the IT Division of Iberdrola, S.A. (or such division as assumes the powers thereof at any time) or the Security, Resilience and Digital Technology Committee of Iberdrola, S.A. regarding the proper use of artificial intelligence and the management of the potential risks arising from the use thereof.

Furthermore, the Digital Transformation Division (or such division as assumes the powers thereof at any time), through the Security, Resilience and Digital Technology Committee, shall act in coordination with the head of business companies of the SP Group and shall prepare the procedures required to ensure the proper use of artificial intelligence and the management of the potential risks arising from the use thereof.

5. Implementation and Development

For the implementation and monitoring of the provisions of this *Policy*, the Board of Directors is assisted by the Digital Transformation Division (or such division as assumes the powers thereof at any time), through the Security, Resilience and Digital Technology Committee, which shall further develop the procedures required for such purpose and shall regularly report to the Audit and Compliance Committee.

The Digital Transformation 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 17 February 2026 and adopted by the Board of Directors of Scottish Power Retail Holdings Limited on 29 April 2026.