

SCOTTISHPOWER PURCHASING 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 applicable legal provisions, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, as well as the provisions of the *General Risk Control and Management Foundations of the Iberdrola Group*, the Board of Directors approves this *ScottishPower Purchasing 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.

The Company recognises as strategic objectives sustainability in the supply chain, the securing of strategic supplies, which enables it to comply with its growth plans, and efficiency in overall purchasing cost, all based on alignment of tender awards with the Company’s strategy and strict compliance with applicable law and the provisions of the *ScottishPower Code of Code of Conduct for Suppliers*.

1. Scope of Application

This *Policy* applies to the Company. Without prejudice to the foregoing, it includes basic principles that, in relation to the sustainable value chain, and particularly the supply chain, 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 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 main principles regarding the sustainable value chain, and particularly with the supply chain, contained in this *Policy*.

This *Policy* applies to all forms of purchases of equipment and materials and to the contracting of works and services, regardless of whether or not they are executed pursuant to a formal purchasing process, except for the provision of services between

companies of the Iberdrola Group, which are governed by the corresponding regulations.

Energy, fuel or raw material supply activities are also excluded from the scope of this *Policy* and provided for in the risk guidelines and limits of the corresponding businesses.

2. Purpose

The purpose of this *Policy* is to establish the principles that must govern, on the one hand, purchases of equipment and materials and the contracting of works and services, and, on the other, the organisational, corporate and shared services model for the companies of the SP Group, with full respect for their corporate autonomy and within the limits established in the legal provisions applicable to the regulated activities they carry out, for purposes of achieving greater efficiency in SP Group-level purchasing processes as a fundamental element for the achievement of the strategic objectives.

3. Main Principles of Conduct

The main principles of conduct that the Company adopts and promotes in the area of purchases of equipment and materials and contracting of works and services are described below:

- a) Foster a supplier relationship policy based on principles of corporate ethics and transparency, striving for continuous improvement and mutual benefit and promoting sustainability, innovation and development activities.
- b) Promote sustained, accessible and sustainable economic growth, as well as endeavour to ensure productive and dignified work for the professionals forming part of the value chain.
- c) Implement the mechanisms required for purchasing decisions to in any event safeguard the achievement of balance among technical competence, quality, accessibility, occupational safety and cybersecurity, with respect to environment and price, as well as the sustainability and quality of the supplier as a key condition for the contribution of value.
- d) Establish supplier selection procedures that conform to standards of objectiveness, impartiality, non-discrimination and equal opportunity, ensuring at all times compliance with the *ScottishPower Code of Conduct for Suppliers*, regardless of own or third-party interests.
- e) Promote compliance by suppliers with contractual terms and conditions and applicable legal provisions, and particularly with the provisions of the *ScottishPower Code of Conduct for Suppliers*, of which it must inform its professionals and subcontractors, together with the existence of the internal reporting channels.

Suppliers and the entities that they in contract in turn for supplies, works and the provision of services to the Company must communicate, through the internal reporting system established by the Company and on the terms established in the Governance and Sustainability System, any conduct that might entail, on the part of any director, professional or supplier of the Company (or of the supplier's subcontractors or professionals), potentially improper conduct or an act that is potentially illegal or contrary to law or to the governance and sustainability system with an impact on the Company, on its contractual relationship with its suppliers, or on the interests and image of the Company, without prejudice to the ability to address their grievances or reports to any competent institution, body or entity.

- f) 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 *Purchasing Risk Guidelines and Limits* and the *Occupational Safety, Health and Well-Being Risk Guidelines and Limits*, 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.
- g) Endeavour to ensure compliance with rules on the separation of activities. If the same entity provides supplies, is contracted for works or provides services to companies of the Iberdrola Group that engage in regulated activities and to companies of the Iberdrola Group that engage in unregulated activities, it must comply with applicable legal provisions and with the requirements and conditions established in the corresponding codes for separation of activities of the Iberdrola Group's companies or similar regulatory instruments.

In this regard, it shall be necessary to respect the effective decision-making capacity of the companies of the SP Group that carry on regulated activities with respect to the assets required for the operation, maintenance and development of their own activities, as well as with respect to limitations on access to commercially sensitive information of the aforementioned companies.

4. Iberdrola Group-level Coordination of the Purchasing Strategy

The Finance and 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 Iberdrola, S.A.'s organisational, corporate and shared services model for the companies of the Iberdrola Group.

5. Implementation and Monitoring

For the implementation and monitoring of the provisions of this *Policy*, the Company is assisted by the Finance and Corporate Services Division (or such division as assumes

the powers thereof at any time), which shall further develop the 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 Retail Holdings Limited on 25 June 2025.