



# ScottishPower Code of Conduct

Extract of the ScottishPower Code of Conduct and Disciplinary Rules

October 2025



## A summary

---

### What is the Code of Conduct?

The Code of Conduct outlines the principles, guidelines and rules that govern the behaviour of anyone working for or representing ScottishPower. It forms a core component of ScottishPower's Governance and Sustainability System and is formally approved by the Board of Directors of Scottish Power Limited.

### Who does it apply to?

The Code of Conduct applies to all ScottishPower Directors and employees, regardless of role or level in the organisation. It also applies to anyone who represents ScottishPower in their work.

### What does it mean?

This Code of Conduct sets out how we expect everyone at ScottishPower to act – ethically, with honesty, and transparency. It explains these expectations using key principles and specific rules. It also outlines what happens if these standards are not met, including the disciplinary rules which will apply if you breach this Code of Conduct or your terms of employment.

### What do I need to do?

You should read this Code of Conduct and make sure that you understand what it means and how it applies to you and your role. If you manage people, you should also make sure that your team understands this Code of Conduct and what it means for them.

### How do I get more information?

If you have questions about the Code of Conduct or how it applies to you, speak to your line manager or contact SP Compliance. For questions about the disciplinary rules or procedures, contact People & Organisation.



### Speaking Out

Illegal or unethical incidents or behaviours should be reported. Discuss with your line manager first. You can also report concerns through our Speaking Out Channel.



# Table of contents

1.	INTRODUCTION	04
2.	A MESSAGE FROM KEITH ANDERSON, SCOTTISHPOWER CEO	05
3.	OUR EXPECTATIONS	06
4.	SCOTTISHPOWER’S VALUES AND BEHAVIOURS	07
5.	ETHICAL DECISION MAKING	08
6.	SPEAKING OUT	09
7.	INTEGRITY AND RESPONSIBILITIES	10
	I. WE PROMOTE AN INCLUSIVE AND RESPECTFUL WORKPLACE	11
	Respect, Fairness and non-discrimination	
	Diversity and Inclusion	
	Anti-bullying & Harassment	
	II. WE ARE COMMITTED TO SAFE, SECURE AND SUSTAINABLE OPERATIONS	12
	Health and Safety	
	Security	
	III. ETHICAL CONDUCT IS THE FOUNDATION OF OUR BUSINESS	13
	Financial Crime	
	Conflicts of Interest	
	Gifts and Hospitality	
	Business Opportunities / Outside activities	
	Use of Artificial Intelligence (AI)	
	Use of Company Resources	
	Insider Information	
	IV. WE SAFEGUARD OUR ASSETS, DATA AND BUSINESS INTERESTS	17
	Compliance with Laws	
	Fair Competition	
	Business Separation	
	V. WE MEET ALL LEGAL AND REGULATORY OBLIGATIONS	18
	Confidential, Sensitive, and Personal Information	
	External collaboration	
	Record Keeping	
8.	LEAVING THE COMPANY	19
9.	SCOTTISHPOWER DISCIPLINARY RULES	20







# 1. Introduction: How to use our Code

This Code of Conduct sets out the standards that we expect you to meet when you work for ScottishPower.

As part of the Iberdrola Group, we are committed to working in a sustainable, dynamic, and collaborative way. This Code of Conduct provides clear guidance on the behaviours expected from all ScottishPower employees and Directors.

This Code of Conduct can be found externally on the Corporate Governance section of the [scottishpower.com](https://scottishpower.com) website, and internally on MyHub. It has been formally approved by the Scottish Power Limited Board, and we expect everyone at ScottishPower to follow it.

The Code of Conduct won't cover all situations that you might face in your role, but it will help you make the right decisions and guide you on how to behave.

The ScottishPower Compliance Unit (SP Compliance) is responsible for interpreting and applying the Code of Conduct within ScottishPower and will work with People & Organisation and SP Legal, as appropriate, on any issues raised in relation to this Code.

It is a requirement of your employment contract that you will comply with this Code of Conduct. Breaching it, or any other company Policy, may lead to disciplinary action. Please make sure that you understand what the Code of Conduct means for you. You'll find the Disciplinary Rules in Section 9.



## Need help or have questions?

If you have any questions about this Code of Conduct, please contact a member of SP Compliance, who will be pleased to speak to you. The SP Compliance structure and contact details are available to employees on the ScottishPower Employee Portal.



## 2. A message from Keith Anderson, ScottishPower CEO

At ScottishPower, we like to say that electrification is unstoppable. Rising electricity demand, driven by decarbonisation and the push for energy security and economic growth, brings into focus the essential role of the energy sector, now more than ever. As the UK's only fully integrated energy utility, with a presence across the entire value chain, ScottishPower has a critical role to play in investing in electrification. But the scale of the challenge demands more than ambition – it demands action, unity, and unwavering integrity.

Our people have always been our best asset. Your expertise, passion, and commitment are vital in our efforts to developing a better future, quicker. When we work together, we achieve extraordinary things. But how we work matters just as much as what we achieve. That's why we must continue to act ethically, responsibly, and in full compliance with the standards that define us.

**Ethics is everyone's business.** It lives in the decisions we make, the conversations we have, and the culture we create – every day. Whether you are in the field, in the office, or working with third parties, your behaviour shapes who we are and how we're seen. Individually and collectively, our ethical conduct is the foundation of our progress.

At ScottishPower, one of your most important responsibilities is to uphold the highest standards in everything we do. That means staying informed, being accountable, and having the courage to speak out when

something isn't right. If you see or suspect behaviour that breaches our Code of Conduct or the law, you must report it. Your voice matters – and honest concerns about misconduct will always be heard, respected, and acted upon.

This Code of Conduct outlines the standards we expect and the behaviours that support them. It's a resource to guide you, support you, and empower you to make the right choices. I encourage you to read it carefully and reflect on how it applies to your role and your daily decisions at ScottishPower.

Thank you for your continued dedication to ScottishPower and to the values that define us. Together we can achieve a better future, quicker.



**Keith Anderson,**  
CEO, ScottishPower





## 3. Our expectations...

### ...of our Employees and Workers

At ScottishPower, we expect everyone – regardless of role, location, or seniority - to live our Values and demonstrate the behaviours that support them.

As part of the ScottishPower workforce, you are expected to:

- Treat our colleagues, customers and third parties with respect, without discrimination.
- Understand this Code and keep up to date on policies and practices relevant to our roles.
- Speak out, ask questions, and act if you see something wrong.
- Use good judgment in all business dealings.

### ...of our People Managers and Leaders

In addition to the above, our people managers and leaders are expected to:

- Lead by example and act in line with this Code and our Values.
- Foster a positive and respectful work environment.
- Understand the link between the Code and the policies and practices that apply to the teams they lead.
- Respond to and escalate concerns appropriately. Promote open communication and trust in the workplace, so our people feel safe to raise concerns or suggest improvements.
- Report concerns promptly and maintain confidentiality in line with legal requirements and ScottishPower standards. Escalate potential or actual violations of the Code, policies, or applicable laws as needed.
- Prevent any direct or indirect retaliation against anyone for sharing concerns in good faith or participating in an investigation and ensure that such behaviour is not tolerated from others.
- Only ask people to do things they would feel comfortable doing themselves.



#### Speaking Out

Illegal or unethical incidents or behaviours should be reported. Discuss with your line manager first. You can also report concerns through our Speaking Out Channel.





## 4. ScottishPower's Values and Behaviours

ScottishPower is fully committed to the Purpose and Values of the Iberdrola Group, including its Ethical and Sustainability principles. These guide our business and are reflected in our core values: Sustainable, Dynamic, and Collaborative. They shape how we work and define our approach to success.



**Sustainable:** We put safety first, respect the environment and act ethically and with integrity. We develop and promote solutions for cleaner energy, low-carbon transport and better air quality, to help the UK achieve its Net Zero goals.



**Dynamic:** We aim to improve how we work by simplifying processes, encouraging innovation, and staying ahead of customer needs.



**Collaborative:** We work together, share knowledge, and promote diversity. We do not tolerate discrimination but strive to create a respectful and inclusive workplace.

Our success depends on our collective commitment to these Values. **If our Values set our direction of travel, this Code of Conduct helps us to get there.** It supports the behaviours that make up our performance management framework, helps guide how we act at work, and outlines the key policies and rules everyone must follow.



We want you to have the best working experience at ScottishPower, and the same for your colleagues – this Code of Conduct is designed to help you achieve that.



The Code of Conduct applies to all Directors and employees, regardless of position in the Company. It is an established part of the Governance and Sustainability System of the Company, as it has been approved by the ScottishPower Board.





## 5. Ethical decision making

At ScottishPower, we go beyond simply following laws and regulations – we expect our people to act ethically and do the right thing every day.

We ask all employees and workers to uphold high ethical standards in all their day-to-day activities. This means acting with professionalism, integrity, and self-control in our decisions, promoting sustainable goals and creating value for our stakeholders.

Ethical decisions can sometimes be complex. We have developed a simple guide to support you and help ensure we are all behaving in the right way - this is what we call our **ethical decision-making model**.



**Remember:** You are responsible for your own actions – it is not a defence to say that someone told you to do it.

### Ethical decision-making model

To help guide your thinking, ask yourself the following questions before making a decision:



**Am I behaving in a way that is ethically acceptable?** Are my actions fair, honest, truthful, or otherwise right?



**Are my actions legal?** Will they comply with legislation or regulatory requirements, as well as ScottishPower Group policies and this Code of Conduct?



**Are my actions in the best interests of the Company?**  
Am I confident that ScottishPower would not be embarrassed or suffer damage (e.g., reputational, or financial) if my actions were made public? Am I putting the Company's interests ahead of my own?



**Am I willing to take personal responsibility for my actions?** Can I justify my behaviour myself and not just because my manager or someone else told me to? Would I be comfortable if my actions were published in the news?

If you can confidently answer "yes" to each of the points above, then you are likely to be acting ethically





## 6. Speaking out

At ScottishPower we believe in creating a workplace where everyone feels safe to speak out. A strong Speaking Out programme helps build a culture of ethics and compliance. It ensures that concerns are raised, looked into, and followed up - without fear of retaliation.

At ScottishPower we encourage everyone to speak openly about any issue - We can only take action on wrongdoing or unethical behaviour if we know about it. The best way to help stop it, is to Speak Out. It's always better to raise a concern early so it can be investigated, rather than letting it grow and cause more harm to the Company or our people.

There are different ways to raise a concern, depending on the situation:



**Grievances:** If you have a personal concern - like how you are being treated or something related to your employment contract – please speak to your line manager or contact People & Organisation.

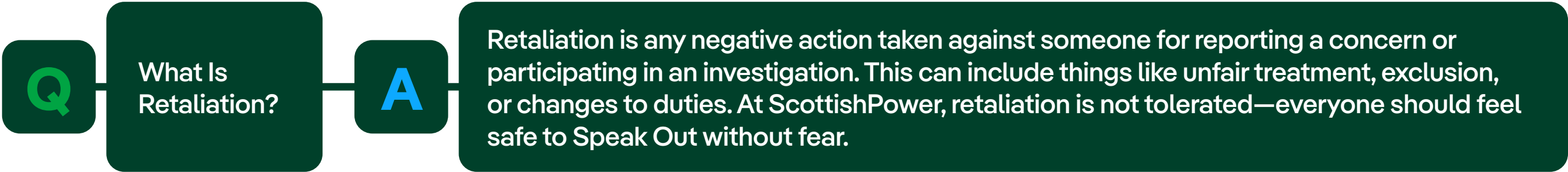


**Speaking Out Reports:** If you see any illegal or unethical incident, issue, activity, behaviour or practice, you must speak out. If you feel comfortable to do so, you should discuss your concern with your line manager in the first instance. The following reporting options are also available:

In person or by email to your Business Compliance Officer (BCO)	The ScottishPower Compliance Unit structure and contact details are available to employees on the ScottishPower Employee Portal
Through the Ethics Helpline reporting tab on the Employee Portal	Available on the ScottishPower Employee Portal
By email to the Compliance Unit mailbox	<a href="mailto:compliancedivision@scottishpower.com">compliancedivision@scottishpower.com</a>
Access our Speaking Out Channel on the ScottishPower website	<a href="#">Speaking Out Channel - ScottishPower</a>

### Anti-Retaliation

ScottishPower has zero tolerance for retaliation, against anyone who raises a concern in good faith. Where we identify that someone has been retaliated against for Speaking Out, this will be subject to disciplinary action, up to and including dismissal. If you believe you have experienced retaliation, report it immediately using one of the available reporting channels.



### What happens when Speak Out?

We know that it can be difficult to Speak Out and you might be nervous about doing so. The infographic below provides a high-level view of what happens when a report is made. Our digital, interactive, Speaking Out Toolkit also offers further guidance and support through every step of the Speaking Out journey:





## 7. Integrity and Responsibilities

As well as behaving in an ethical way in our working lives, the Code of Conduct requires us to comply with the policies approved as part of ScottishPower's Governance and Sustainability System. We won't set them out in full here but will explain what these mean in relation to the relevant principles, and where you can find more information. If you behave in a way that breaches these policies or procedures, you could face disciplinary action.

I. We promote an inclusive and respectful workplace

II. We are committed to safe, secure and sustainable operations

III. Ethical conduct is the foundation of our business

IV. We meet all legal and regulatory obligations

V. We safeguard our assets, data and business interests



### Speaking Out

Illegal or unethical incidents or behaviours should be reported. Discuss with your line manager first. You can also report concerns through our Speaking Out Channel.





## 7. Integrity and Responsibilities

### I. We promote an inclusive and respectful workplace

**We want to ensure a working environment that supports all of our employees and workers and gives them the opportunity to succeed. All employees, contractors, third parties and customers should be treated with respect, fairness, and equality. We will not tolerate discrimination in our workplaces but will work together to promote positive behaviours for our workforce.**

#### Respect, Fairness and non-discrimination

You must make sure that you do not discriminate against any individual or group of people, either directly (by treating them differently or unfairly) or indirectly (by putting in place conditions that could put certain people at a disadvantage, even if that is not the main aim of those conditions).

#### Diversity and Inclusion

You should make sure that you are familiar with ScottishPower's Equality & Diversity Policy. If you or someone you know feels that they are being discriminated against, please raise this with your manager or with People & Organisation. It is important that any potential discrimination is identified and addressed.

#### Anti-bullying & Harassment

In the same way, harassment of any kind is unacceptable. You must be aware of and comply with ScottishPower's Bullying & Harassment Policy. This Policy prohibits the harassment, including Sexual Harassment, of any employee (current, former, or future), third party, customer, or member of the public and requires all ScottishPower employees to treat anyone they come into contact with in the course of their employment with respect and dignity. Examples of conduct which is considered to be either bullying, harassment or sexual harassment can be found in the Bullying & Harassment Policy on MyHub.

People & Organisation can provide advice and support to anyone who feels that they are being harassed, bullied or sexually harassed by another employee. Any employee found to have bullied, harassed or sexually harassed a third party in the course of their employment with ScottishPower could be subject to action under ScottishPower's Disciplinary procedure.



**Remember:** Bullying, discrimination or harassment has no place in our Company. Your main responsibility is to create a safe and positive environment and always treat your colleagues, customers and others with dignity and respect.





## 7. Integrity and Responsibilities

**We conduct all operations with a clear commitment to safety, security, and sustainability. We strive to protect our people and assets while actively working on solutions that will help to decarbonise our economy and deliver a better future, quicker.**

### Health and Safety

The health, safety and welfare of our employees, suppliers and communities are our priority. We all have a critical role to play in protecting our workforce. You must be proactive in your approach to health and safety, and make sure that you help to maintain safe working practices and behaviours in your work area. We never want to contribute to a situation that prevents an employee from going home safely. You should ensure that you are aware of the Health and Safety Essentials and what these mean in practice.

We must all lead by example and promote a just and fair health and safety culture throughout the business. This means making sure that we are all suitably and sufficiently trained and skilled for the work that we are required to do; challenge poor behaviours; unsafe acts or decisions and report any incidents or accidents as soon as possible.

You must also be aware of ScottishPower's Alcohol & Drugs Policy and make sure that you understand your obligations under this policy, including requirements to take part in random alcohol and drugs screening if required. Alcohol and drugs can contribute to unsafe working practices, and their misuse during working hours

is a serious issue. If you need support with any issues associated with alcohol and drugs, support is available through our Occupational Health team.

### Security

It is important that we work together to keep ourselves and each other safe. ScottishPower has a series of security policies in place, that are designed to make sure that our security arrangements meet industry best practice and protect human rights principles. We all have an important role to play in both the physical and digital security of the organisation.

#### Physical Security

You should make yourself aware of the Strategic Emergency Procedures Guidance and be prepared to comply with them. You should make sure that you stay alert to potential threats to security and report any suspicious activity to your local Security team as soon as possible. Your access pass should always be visible when you move around a ScottishPower site and should be removed from sight when you leave. Anyone who is not clearly displaying an access pass should be challenged or the security team should be informed. Do not let anyone follow you through doors or gates without using their pass and do not hold doors or gates open for anyone who is not clearly displaying an access badge. Politeness can threaten security and if you are unsure, ask the person where they are going, who they are meeting and confirm they are entitled to be within the area being accessed.

## II. We are committed to safe, secure and sustainable operations

### Cyber Security

Digital Security is also vital for our customers and employees, and we must all be aware of our role in protecting it. You must read and follow the requirements of the Acceptable Use of Digital Assets Policy, as updated from time to time, as this contains important requirements to protect our most important digital assets from threat. You must also be aware of the potential impact of phishing and how to report it.

### Environment and Sustainability

We are committed to protecting and preserving our environment in delivering our policies and activities. We believe that we are all responsible for looking after our environment and developing strategies that promote and support good environmental performance.

You should make sure that your actions and behaviours in the workplace do not harm the environment and whenever possible aim to enhance it. You must be aware of all relevant laws, regulations, permits, and standards in respect of the environment and comply with any requirements of environmental licences, permits or consents. You are responsible for keeping a fair and accurate record of any incidents that might affect the environment, and you must not attempt to conceal any such incidents or their details.

You must always be alert to potential issues involving storage, transportation and disposal of waste, handling of toxic and dangerous materials and emissions into the land, water, and air, and aim to prevent pollution. You

should seek support from your business's specialist environmental teams if you are aware of, or concerned about, any such issues.

In line with our Sustainable Development strategy, we should all aim to make ScottishPower's activities more supportive of people and communities. This means respecting human rights, helping improve the quality of life in the communities in which we do business, making energy available for everyone, and giving extra support to customers facing financial hardship or other vulnerable situations.







## 7. Integrity and Responsibilities

### III. Ethical conduct is the foundation of our business

**Doing what's right is more than a policy, it's who we are. Our commitment to ethical behaviour empowers us to build trust, make principled decisions, and lead with integrity. It shapes our culture, strengthens our relationships, and helps ensure we make a positive impact in everything we do.**

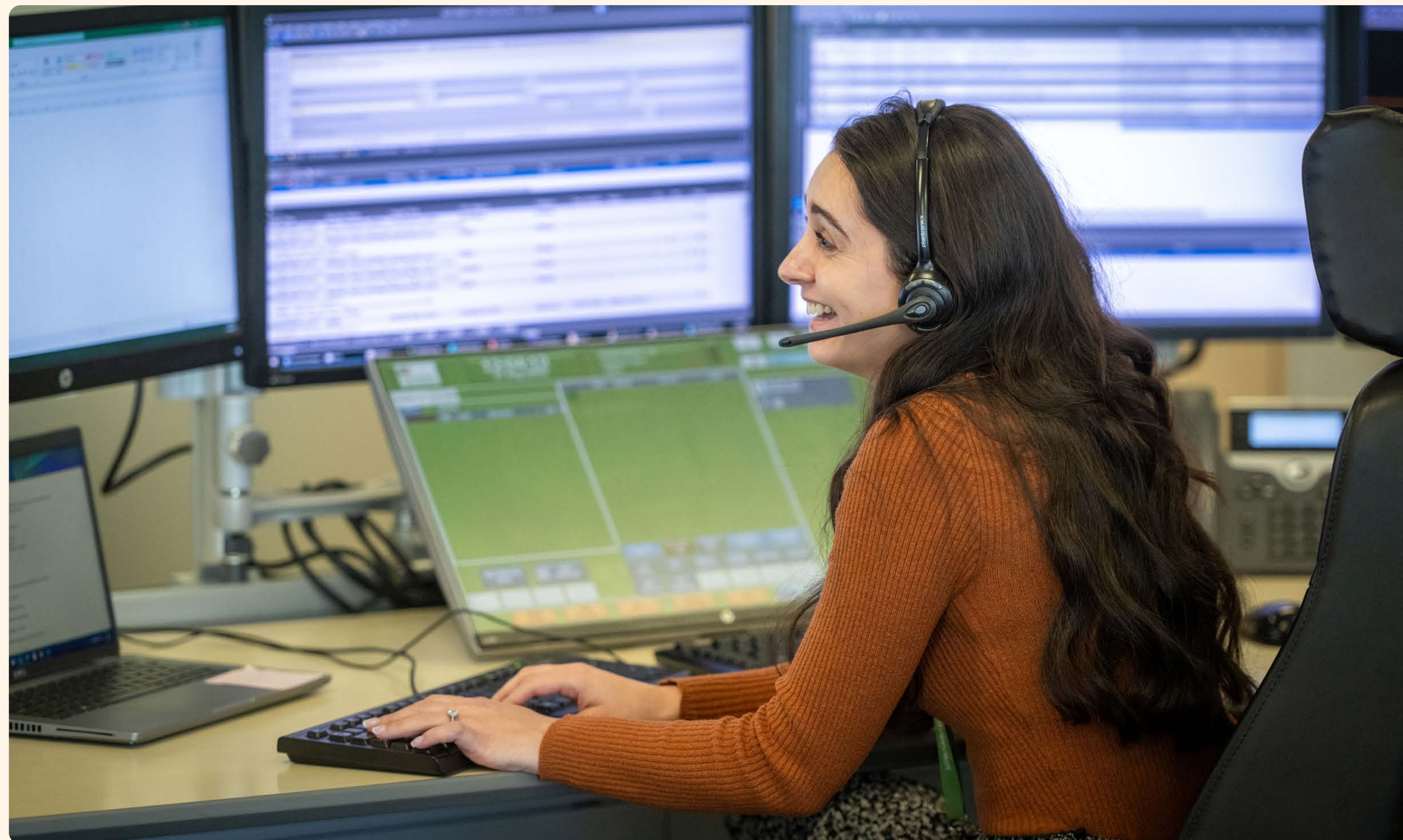
#### Financial Crime

ScottishPower has a zero-tolerance approach to financial crime including but not limited to bribery, corruption, and fraud and is committed to doing business in a fair, honest, and transparent manner. Our [Financial Crime Policy](#) sets out the key principles that we will adhere to in doing business.

You must make sure that you are aware of the Financial Crime Policy and what this means for you. Our Compliance & Ethics Manual sets out the procedures and practical requirements that we all need to follow to comply with the Policy. You are responsible for following the appropriate procedures where required. In particular, you must be aware of any situation that could cause doubt over ScottishPower's independence or impartiality when doing business, or that could result in a fraud being committed on ScottishPower's behalf. This includes representations being made on ScottishPower's behalf by our third parties.

If you become aware of any suspicious, fraudulent, or corrupt behaviour, you should speak to SP Compliance. Please do not attempt to investigate yourself. Your line manager can support if appropriate.

Financial crime can take many forms and what might seem like standard business practice could still create a risk to ScottishPower. The Financial Crime Policy and the Compliance & Ethics Manual will guide you in the practical requirements, but we'll also explore some of those risk areas further in this section of our Code.







## 7. Integrity and Responsibilities

### III. Ethical conduct is the foundation of our business



#### Conflicts of Interest

##### What is a Conflict of Interest:

A Conflict of Interest is any case in which your own circumstances (financial, business or personal activities), which conflict with, or have the potential to conflict with, ScottishPower's interests. This can include the perception of others that you could be influenced by those circumstances.

It is not wrong to have a Conflict of Interest, but it is wrong to let it influence your actions or decision-making. It is important to recognise and disclose any potential conflicts and seek advice. SP Compliance will support open discussion in a timely manner to enable any required mitigating actions to be implemented.



I think I have a potential Conflict of Interest but I am not sure what to do?



You should inform your Line Manager if you are able and in all cases, you are required to report any potential conflict to SP Compliance. SP Compliance will record the circumstances of the conflict (in an appropriate way), recommend any appropriate action as needed, and inform People & Organisation as required. You must not take any action in relation to that matter until the conflict is resolved.

A conflict can cause reputational damage even if you do not act upon it. All conflicts should be declared to ensure full transparency, even if the conflict is mitigated or you do not act inappropriately.

#### What types of Conflicts of Interest can there be?

##### Outside Employment & Business Activities

This includes any outside employment or activity like starting a small business or commercializing an idea.

##### Personal Relationships

This includes family, romantic relationships, and close friends who might influence your business decisions.

##### Business Relationships

It's natural to develop good working relationships with business partners but these can also cause a conflict.

##### Board Memberships, Advisory & Industry Association Boards

These can give rise to conflicting loyalties and obligations.

##### Gifts & Hospitality

Accepting gifts and or hospitality which might influence or be seen to influence your business judgement.

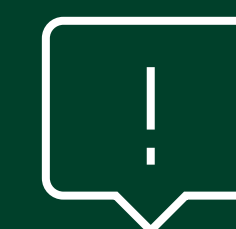
##### Sponsorships and award of 3rd Party Contracts

These circumstances can create the ability to influence decisions

##### Other Outside Activities

Community involvement, public service, and charitable activities when undertaken as a regular activity involving significant time can lead to a conflict.

#### Examples of potential conflicts of interest



**Remember:** It is not wrong to have a Conflict of Interest and in fact many employees do. It is important that any conflicts are disclosed, to allow SP Compliance to review and resolve them appropriately.





## 7. Integrity and Responsibilities

### III. Ethical conduct is the foundation of our business

#### Gifts and Hospitality

The giving of G&H can be a significant risk factor for bribery and corruption because they can influence the independent decision making of the recipient. Before you offer or accept any gifts or hospitality think about whether it is the right thing to do.

**The G.I.F.T. Rule** can help you do that:

**G**

#### Have you been given the **Green light**?

You should be aware of the risks around G&H. You should always seek approval from your line manager before offering or accepting any gifts or hospitality. *You are responsible for ensuring any gifts or hospitality you offer or receive are appropriate.*

**I**

#### Have you considered the **Intent** of the gift or offer?

&H should only be given as a courtesy and be in line with normal business practice. *You should ensure that the giving or acceptance of any gifts or hospitality could not be seen to improperly influence a decision for ScottishPower's benefit.*

**F**

#### How **Frequent** are gifts/hospitality exchanged and is the timing appropriate?

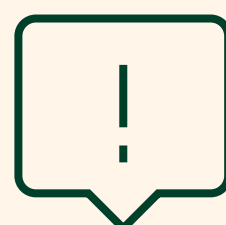
You should ensure that G&H are only offered / accepted occasionally and do not become too frequent that they could be perceived as excessive. You should consider the appropriateness of timing of G&H, e.g. just prior to contract award / renewal.

**T**

#### Is the value of the gift / hospitality **Too** much?

The cost or value of the gift / hospitality should be reasonable, given the circumstances. Cash or cash equivalents (vouchers), should never be offered or accepted.

**If you have any doubts or concerns as to the appropriateness of an offer of a gift or hospitality, the offer should be turned down or, if appropriate, discussed with SP Compliance.**



#### Remember:

- You must never seek or accept a gift or hospitality where it could influence (or be seen as an attempt to influence or affect) decision-making in any way.
- You should always seek approval from your line manager before offering or accepting any gift or hospitality. You are responsible for ensuring any gifts or hospitality you offer or receive are appropriate.
- Every offer of gifts over £25 value or hospitality over £50 value must be reported to SP Compliance, in advance, using the online form on the Employee Portal. This applies to gifts and hospitality given to SP employees, even if it is declined.



**Q**

I am running a tender for an upcoming contract award. A bidding company has invited me to a luxury overnight event at a golf resort, all expenses paid. What should I do?

**A**

Decline the offer, inform your manager and report it to SP Compliance for transparency.

Aspects to be aware of are:

- **Timing and Intent:** The offer was made during an active bidding process which could influence, or at least be seen to influence, decision making and the outcome of the tender.
- **Value:** The hospitality is high in value and could be seen as excessive. It would not be appropriate to accept on this basis.

**Q**

I have just completed a routine project with a long-standing supplier and they have invited myself and a colleague for lunch (roughly £30 per person value) as a thank you gesture. What should I do?

**A**

You should obtain approval from your line manager, and as the offer is estimated to be above £25 in value, you should report the offer to SP Compliance, in advance, for transparency. It would generally be considered appropriate to accept the offer.

Aspects to be aware of are:

- **Timing and intent:** The project has completed, so there is no ongoing decision or contract at stake, and the gift appears to be a simple thank you, not an attempt to influence future decisions.
- **Value:** The lunch is of low value and not excessive.





## 7. Integrity and Responsibilities

### III. Ethical conduct is the foundation of our business

#### Business Opportunities / Outside activities

##### Activities Outside ScottishPower

You may be asked to, or want to, take on activities or roles outside of ScottishPower, in addition to your role with the Company. This could include helping with charities, joining a board, teaching or starting your own small business.

Your priority must be to your role with ScottishPower. Make sure any outside work does not affect your ability to perform your role effectively. Before you start any new role, you should discuss with SP Compliance, to consider whether any measures need to be put in place to manage any conflict.

You must not take on any work that is in competition with ScottishPower, could harm the legitimate business interests of the Company, or is likely to result in you becoming unfit for work.

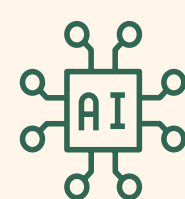
##### Social Media

When you take part in any activities outside of your employment, it should be clear that this is entirely personal and not connected with your role in ScottishPower. This includes your use of personal social media. You can refer to the SP Social Media Guidelines for more guidance on the use of social media in relation to your role.

##### Use of Artificial Intelligence (AI)

We must use AI technologies responsibly and ethically, ensuring compliance with all applicable laws, regulations, and company policies. We do not tolerate misuse of AI, including increasing unfair bias, data privacy violations, or unauthorized automation.

ScottishPower has adopted and promotes a set of AI principles of conduct that must govern its activities regarding the design, development, application and use of artificial intelligence tools. Further information can be found in the [Policy on the Responsible Development and Use of Artificial Intelligence Tools](#).



*AI tools should be used to enhance productivity and decision-making— not to replace human judgment or ethical decision making.*

#### Use of Company Resources

ScottishPower will give you the tools and support you need to carry out your role and help improve how we work. You must use these resources in a responsible and honest way. This includes making sure that you only use these resources for the purposes of your role and not for any personal or private purposes.

For example:

- Do not use company email or IT equipment for non-work-related activities.
- Do not use company credit cards, buying cards or expense claims for anything that isn't work related.
- Be aware of, and always follow, the rules and limits set within our Expenses Policy.

Do not disclose information about the systems, tools or resources owned or used by ScottishPower and do not offer to loan or gift any company resources to

anyone outside the company, unless this has been clearly approved by an appropriate ScottishPower senior manager.

ScottishPower offers a generous benefits package, including discounts and offers through the Employee Benefits scheme. You can only take advantage of discounts or offers that are available to all employees as a whole – you shouldn't use your role to seek any discounts or offers that are not generally available to all employees.

#### Insider Information

In your role, you might come across information that isn't available to the public and could affect the value of stocks or other financial products. You must never use this information for personal gain, such as buying, selling, or holding shares or other investments.

Some roles in the company will be considered to be within the scope of the Internal Regulations for Conduct in the Securities Markets. These roles have been identified as having access to sensitive information about the Group, and therefore restrictions have been placed on when they can trade Group shares or communicate with third parties about that information. These rules also apply to anyone who might come across insider information and could benefit unfairly from it.

Always be careful when buying or selling shares or other financial products. Make sure your decisions are honest, fair, and not influenced by any inside information you may have access to (whether it's about ScottishPower, the Iberdrola Group or any related company).







## 7. Integrity and Responsibilities

### IV. We meet all legal and regulatory obligations

**We operate in full compliance with all relevant laws and regulations. Everyone at ScottishPower is expected to understand and uphold these obligations, ensuring our actions reflect integrity and accountability at all times.**

#### Compliance with Laws

At ScottishPower we take our legal obligations extremely seriously. We all have a responsibility to understand the laws and regulations that apply to our business and to comply with both the spirit and the letter of these. Not knowing or understanding legal requirements is not an excuse or defence.

You must not do anything that could result in a breach of law or relevant regulations. You must:

- Know the laws or regulations relevant to your role and comply with them at all times.
- Only act in line with the level of authority of your role.
- Ensure the third parties that you work with are clear about ScottishPower's expectations of them
- Ask your local Legal team if you are unsure about anything.

If you become aware of, or concerned about, any criminal activity in relation to ScottishPower's business, you must report this to SP Compliance or your local Legal team immediately. If you take part or are involved in any criminal activity, you could be subject to penalties or sanctions or even imprisonment. This will not be tolerated within ScottishPower and may be subject to action under ScottishPower's Disciplinary procedures.

If you are accused of, or involved in, a crime committed outside of work, it could impact ScottishPower's reputation or activities. Therefore, if you are formally accused or charged with involvement in an illegal activity, you must notify your local SP Compliance contact, who will assess the circumstances and determine if any additional action or support is required. All contacts on this issue will be kept confidential, as far as possible.

#### Fair Competition

ScottishPower supports free and open competition. We do not allow any actions that could unfairly limit competition or trade.

Competition Law is a complex area, so it is important that we all follow the rules. ScottishPower has a [Competition Law Compliance Policy](#) and Manual (applicable throughout ScottishPower), to help employees understand their roles and responsibilities in this area.

You must make yourself aware of what anticompetitive behaviour means and what it might look like in practice. This is particularly important if you work with third parties or are involved in sales, marketing, or trading. You must not:

- Accept any unsolicited confidential information about a competitor
- Take part in any meetings or activities with competitors that are not fully documented (with a clear agenda)
- Enter into any informal agreements with competitors.

If you have any doubts or questions, you should contact your local Legal department, who can advise on competition law matters.

#### Business Separation

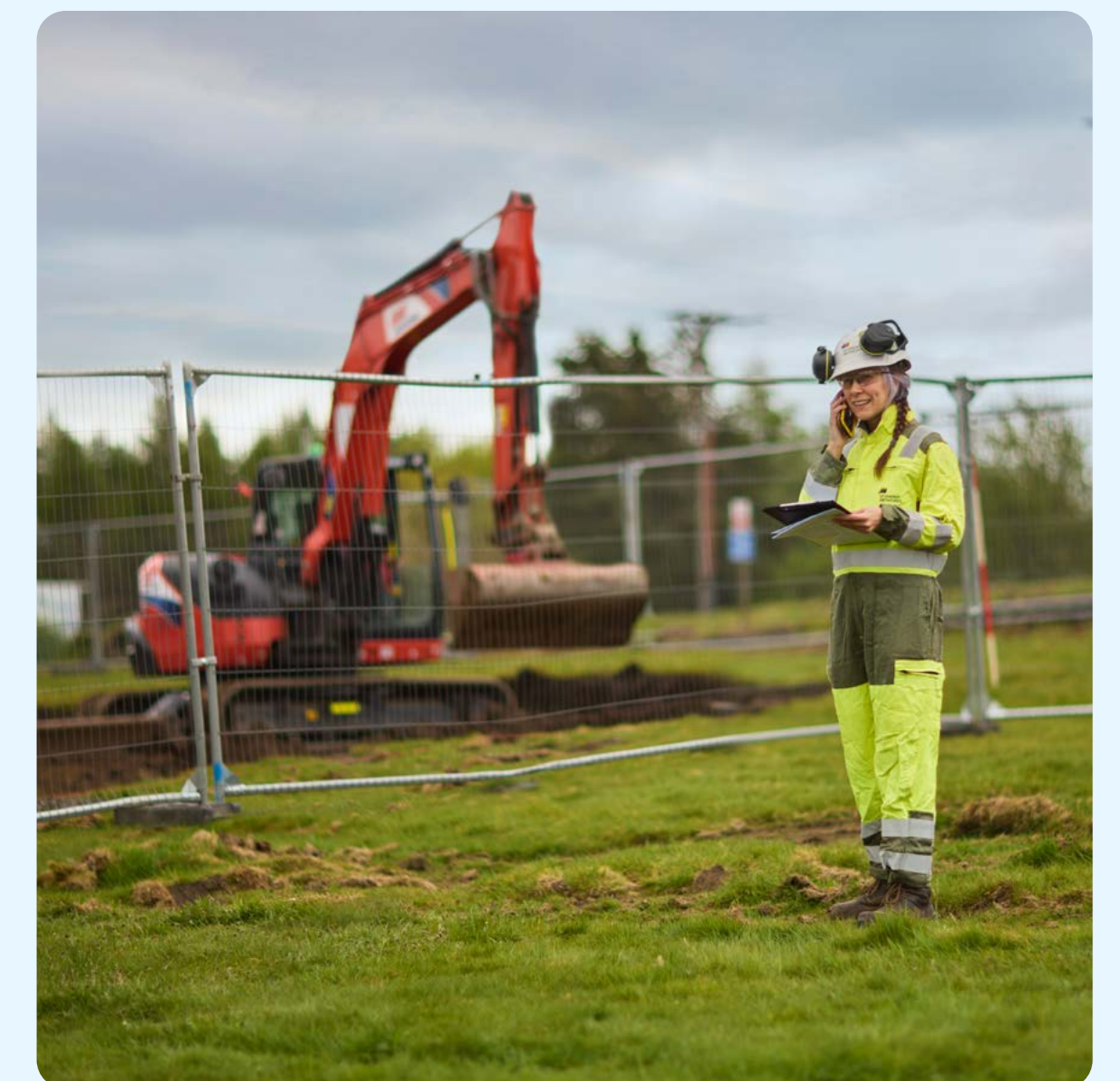
SP Energy Networks (SPEN) is a regulated business that operates as a natural monopoly. Under its Distribution and Transmission licences, SPEN must work within the rules of Business Separation. The [ScottishPower Business Separation Policy](#), which applies to all ScottishPower Businesses, provides more detail on these rules and what they mean in practice.

We must ensure:

- SPEN is managed and run separately from other parts of the ScottishPower Group, with its own brand.
- Confidential SPEN information is not shared with other parts of the Group.
- IT systems with SPEN data are kept separate from other parts of the Group.
- Access to SPEN premises is controlled, especially if shared with other parts of the Group. Personnel transferring to other parts of the Group must also be managed carefully.
- No financial support (cross subsidies) is given between SPEN and any other Group businesses.
- Metering and connection services must be offered fairly to all suppliers and competitors.

Business Separation doesn't stop us from working together across ScottishPower, provided we keep Business Separation in mind. You can still talk positively about the Group, both internally and externally, and attend cross-business events with colleagues, so long as no confidential SPEN information is shared. At external events SPEN and non-SPEN staff can attend, as long as there is clear separate branding for SPEN activities.

If you have any questions on business separation, you can contact the business separation mailbox - [businessseparation@spenergynetworks.co.uk](mailto:businessseparation@spenergynetworks.co.uk)







## 7. Integrity and Responsibilities

### V. We safeguard our assets, data and business interests

**We are committed to protecting the organisation's assets, proprietary information and commercial interests. All employees must handle data responsibly, maintain confidentiality, and use resources in accordance with legal, ethical and corporate standards.**

#### Confidential, Sensitive, and Personal Information

##### Confidentiality

You may have access to confidential or sensitive information in the course of your work. You must make sure that you are aware of the sensitivity of any information that you use and protect it accordingly. Take care how and when you discuss or disclose such information and only use it for the purposes of your work. As a general rule, you should treat all information you deal with as confidential, unless it is information that you know to be public, or which needs to be disclosed. You must read and understand the Information Protection Rule and how it applies to you.

For example, you must never disclose confidential information to a third party without being sure who you are discussing this with and ensuring they have a legitimate requirement to receive the information.

##### Personal Information

The protection of personal information (that is information that can be used to identify individuals, such as customers or employees) is of utmost importance. You must be aware of, and always comply with, the [ScottishPower Data Protection Policy](#) and also complete

any requested training. You should never disclose personal information without seeking advice from your Data Protection Manager / team.

##### Intellectual Property

You must also make sure that you are aware of any intellectual property rights associated with any work, especially when it involves third party content. This means the rights to use, change, share or otherwise publish material, photos, or audio. We must respect the intellectual property rights of both ScottishPower and any third parties. ScottishPower branding or logos must not be used unless explicitly approved by the Brand or Communications team.

If you have any concerns about the use of Company or third-party information, you should seek advice from your local Legal team.

##### External collaboration

As experts in our field, ScottishPower personnel may be invited to speak at external events, provide interviews, offer advice to related organisations, or publish articles on relevant topics. These opportunities can be a great way to promote our positive work. However, it's essential that all external communication is carefully considered, as anything you say might be seen as the official view of ScottishPower.

Before you agree to take part in any external collaboration, you must get approval from your manager and (where relevant) the Corporate Affairs team. The content to be presented should be agreed

in advance, and you must not share any confidential or sensitive information or do anything that could harm ScottishPower's interests. The Corporate Affairs team will also confirm whether any training or briefing is needed before the event.

If you are contacted by the media, do not respond. All such requests should be referred directly to the Corporate Affairs team.

You should take great care in any engagement with elected parliamentarians, ministers and political advisers. Always refer to the [Political Engagement Policy](#) to make sure that you are behaving appropriately in such engagements. The Political Engagement Policy regulates what ScottishPower personnel must do before engaging with politicians and their advisers, and what to do following any unplanned contact as part of their day-to-day activities. You should inform the Government Affairs team as soon as possible ahead of any engagement with politicians, so that this can be recorded correctly.

Generally, you should also take care in any engagement with public bodies and government officials, particularly at a senior level, and advise Corporate Affairs in advance, as appropriate, to ensure any required briefings or training can be provided.

##### Record Keeping

ScottishPower is committed to maintaining accurate books and records, and to accurate financial and non-financial reporting. This helps protect the integrity of our activities. Everyone has a role in keeping accurate

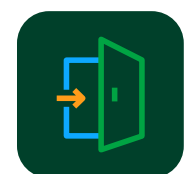
records of our transactions and activities, to evidence our behaviour as a company.

You must not destroy, spoil, change or hide any record or transaction to mislead others, internally or externally. You must store all records and data safely and securely and keep them in accordance with the relevant Retention Policy in your area.

You must also take care that records of activities and transactions are correct and accurate. You must never sign or approve anything unless you have checked that the details are correct and match the activity.







## 8. Leaving the Company

### Employees and Workers:

Before you leave, you should make sure that you return everything in your possession that belongs to ScottishPower. This includes any saved information and data, and any technology or devices that store information. Even after you have left ScottishPower, you will have a contractual responsibility to maintain obligations in relation to competition and confidentiality.

ScottishPower leavers are also asked to complete a short online Exit Survey to help us to improve the workforce experience. Responses will be treated in the strictest of confidence.

Further detail can be found in the Leaving the Company - Employee Information article.

You should make sure that you are aware of any terms in your employment contract that restricts the type of work you can do after leaving ScottishPower. Even if you don't have any such terms in your contract, you should be aware that a conflict of interest could arise if you, as an ex-

employee, look to take employment with a business or organisation that has a contractual or other relationship with the Company. If you leave in such circumstances, you are advised to inform the Company of the nature of the proposed employment and your participation in it. You can do this through your manager or through the SP Compliance mailbox.

### Line Managers:

When a member of your team decides to leave the Company, you should assess the potential risks to allow ScottishPower to take steps to protect commercial or sensitive information and mitigate conflicts of interest, as required. Further detail can be found in the Leaving the Company - Manager Information article.

All access to ScottishPower premises and IT systems should be removed as well as ensuring that all Company property, including the access control card (security pass), is returned. As a manager it is your responsibility to ensure this happens. Our Asset Return Guidance article provides additional information on the required actions.

Q

A member of my team is leaving the company, what risk factors do I need to consider?

A

You should consider if the individual is leaving to:

- Join a competitor, consultant, regulatory body, supplier, stakeholder, or third party linked to ScottishPower.
- Start a business in the same industry or engage in related activities.
- Undertake any activity that may pose a commercial risk.
- Is unwilling to disclose their next role but is expected to remain in the industry.

You should also assess if they:

- Have access to valuable commercial information (e.g. contracts, technical data, financial systems, strategic plans).
- Have a potential conflict of interest with their current role at ScottishPower.
- Are graded OL17, EN7, Band 6 or above.

If any of the above risk factors exist, you should contact the People Services Team or your Business Compliance Officer.

Additional steps may need to be put in place to protect ScottishPower's commercial or sensitive information, or to mitigate any conflict of interest.

Further detail can be found in the Leaving the Company - Manager Information article.





## 9. ScottishPower Disciplinary Rules

Gross Misconduct means behaviours which are sufficiently serious to require summary dismissal of the employee. There is not an exhaustive list of what makes up gross misconduct, but ScottishPower has established a set of rules as examples of what this will include. These rules have been developed in line with the Code of Conduct, as well as the ACAS Code on discipline and grievance.

**A full copy of this Code of Conduct incorporating the Disciplinary Rules is available to employees on the Employee Portal.**







ScottishPower  
320 St Vincent Street, Glasgow G2 5AD  
**scottishpower.com**