

**Renewable Energy & Human Rights Benchmark 2025
Company Profile**

Company name Iberdrola
Sub-sector Project developer
Overall score 49% weighted average

Section score	Weighting	For section
77%	20%	1. UNGP core indicators
27%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure to forced labour
N/A	10%	3.b Other serious allegations
88%	20%	4. Low Carbon Transition assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found [here](#).

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company's Human Rights Policy states: 'The purpose of this Policy is to formalise the commitment of the Group's companies to the human rights recognised in domestic and international legislation and to define the principles that shall be applied within the boundary of the Group for due diligence in the area of human rights pursuant to the Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the principles underpinning the United Nations Global Compact, the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, the conventions of the International Labour Organization (including convention 169), the Sustainable Development Goals (SDGs) approved by the United Nations (UN), the Company's Code of Ethics, as well as such documents and texts as may replace or supplement those mentioned above.' [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com] Met: Commitment to UNGPs: See above. [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Company's Policy on Respect for Human Rights states: 'the Group also explicitly makes the following commitments: a. to reject child labour, forced or compulsory labour, and any form of modern slavery; b. to respect freedom of association and collective bargaining; c. to respect the right to freedom of movement within each country; d. to not discriminate due to any condition'. [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com]

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	Principles and Rights at Work		<ul style="list-style-type: none"> • Not Met: Expects business relationships to commit to ILO core principles: The Company's Suppliers' Code of Ethics states: 'Suppliers shall reject all forms of forced or compulsory labour and modern slavery [...] suppliers shall expressly reject the use of child labour, both within their organisation and in their supply chain [...] Suppliers must reject: (i) all discriminatory practices due to any condition or characteristic in employment and occupational matters and treat their professionals fairly and with dignity and respect; and (ii) any conduct that might be classified as harassment [...] The freedom of association and the right to collective bargaining of the suppliers' professionals must be respected thereby, subject to the law and to the main international conventions applicable in each case [...] Suppliers shall take the measures required to ensure the health and safety of their professionals or of third parties providing services on their premises in all aspects related to the performance of their duties'. However, it is unclear whether the Company requires their suppliers to respect freedom of association and collective bargaining in all contexts, as it indicates 'subject to the law and to the main international conventions applicable in each case'. In these cases (Companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers' bodies where the right to freedom of association and collective bargaining is restricted under law. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Suppliers' Code of Ethics, 06/2023: iberdrola.com]
A.3	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Commitment to remedy adverse HRs impacts: The Company's Policy on Respect for Human Rights declares that 'To achieve the aforementioned goals and commitments the following main principles that must govern the conduct of the companies comprising the Group in all areas are adopted and promoted at the Group level [...] Have a due diligence system that identifies situations and activities with a higher risk of violating human rights, in order to develop mechanisms for the prevention and mitigation of such risk and to redress the impacts if they occur'. [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com] • Not Met: Expects business relationships to make this commitment: The Company provided BHRRC with the following piece of evidence: 'In accordance with applicable law, in their contracts with suppliers, the companies of the Group may establish clauses, guarantees and methods of independent verification related to compliance with the Code of Conduct, as well as the establishment of prevention plans or plans to correct impacts on human rights, in those cases in which it is determined that the severity or probability of occurrence thereof is high. 3. Suppliers shall establish the mechanisms required for their professionals and third parties to make anonymous complaints or claims in the event of possible breaches of the first paragraph of this Article. If such complaints and claims affect products or services provided to a company of the Group, suppliers shall inform the relevant Group company of the results of the investigation of the complaints received, as well as of the measures taken'. However, no evidence was found regarding the Company requiring its business partners to commit to provide remediation to the affected stakeholders. [Code of Conduct for Directors, Professionals and Suppliers, 25/03/2025: iberdrola.com] • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Whistleblowing Protection System Policy states the following Iberdrola's main Principles of Conduct: 'Provide all assistance and cooperation that may be requested by internal or judicial and administrative bodies and domestic or international institutions and entities, including competition authorities, to investigate acts that are allegedly improper, illegal or contrary to law or the Governance and Sustainability System that may have been committed by the members of the management bodies or the professionals of the Company or of the other companies of the Group and that relate to or affect the scope of their activities.' However, it is not clear whether the Company commits to collaborating beyond the investigation of 'allegedly improper, illegal, or contrary to law', including in the remedy provision. The Human Rights Report states that 'The company does not, in any way, impede access to state judicial or nonjudicial mechanisms and cooperates in good faith with them'. However, this indicator requires commitments to be placed in formal policy documents, rather than reports. The Company provided BHRRC with evidence that the Company mandates employees and professionals within the Group must use the internal reporting system to communicate any information they have about potential misconduct, illegal acts, or breaches of the Group's governance and sustainability rules. This includes actions that could be considered crimes, serious administrative offences, or violations of EU law, especially if they impact the Company, its suppliers, or its

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			<p>reputation and that this requirement doesn't prevent individuals from also reporting to the Spanish Independent Whistleblower Protection Authority or other relevant external bodies. However, this sub-indicator seeks evidence that the Company has a publicly available policy statement committing it to co-operate with judicial and non-judicial mechanisms to provide access to remedy. [Compliance and internal reporting and whistleblower protection system policy, 20/06/2023: iberdrola.com] & [Code of Conduct for Directors, Professionals and Suppliers, 25/03/2025: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: Commitment to work with business relationships on remedy: The Human Rights Report states that 'Iberdrola is committed to providing compensation in relation to the impacts that it causes or contributes to in its operations and/or through its value chain or other business relationships'. However, this subindicator looks for formal policy documents committing to work with suppliers in remedy provision. The Company provided evidence to BHRRC, however, the provided evidence was not relevant. [Human Rights Report 2022, N/A: iberdrola.com]
A.4	Commitment from the top	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Board of Directors has the Sustainable Development Committee, which 'possesses the following remits, among others, within the field of human rights: To oversee performance in sustainable development matters and, in particular, to ensure its practices in environmental and social matters are in line with the strategy and policies approved by the Board of Directors, and to report on it. To report to the Board of Directors information received on the measures and procedures adopted in the group in order to implement and monitor the provisions of the Policy on Respect for Human Rights'. [Human Rights Report 2022, N/A: iberdrola.com] • Met: Describes HRs expertise of Board member: Sara de la Rica Goiricelaya, the chair of the Sustainable Development Committee, holds a 'Ph.D. in Economics from the University of the Basque Country and professor at this institution, She has dedicated a large portion of her professional life to the study of and search for solutions on issues such as immigration, the labour market, gender equality and poverty.' Additionally, Nicola Mary Brewer's (member of the Committee since April 2020), professional background includes her appointment through open competition as the first Chief Executive of the newly established Equality and Human Rights Commission in Great Britain. [Sara de la Rica Goiricelaya- Professional profile and biographical data, 2023: iberdrola.com] & [Nicola Mary Brewer- Professional profile and biographical data, 2023: iberdrola.com] • Not Met: Board member/CEO signal importance of HRs in their communications: Although the Human Rights report is prefaced by the CEO/Chairman, the communication is expected to discuss why human rights matter or any challenges to respecting human rights encountered by the business. The Company has provided the following evidence to BHRRC regarding this sub-indicator: Chairman's statement: 'At the Iberdrola Group, we respect human rights with conviction and always act responsibly and with respect for people, the environment, and the communities in which we are present. We are aware that large companies have a very positive impact on society, but we also know that there are certain aspects of the performance of our value chain in which we must be very vigilant.' However, no details included as per why human rights are important for the Company and its operations, or whether the Company has faced any challenges in upholding human rights within its business. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Human Rights Report 2022, N/A: iberdrola.com] & [Press release: We are pioneers with our Human Rights report..., 16/01/2023: iberdrola.com] • Met: CEO or board incentives: The Company's Annual Report on the Remuneration of Directors and Officers states: 'The only directors who receive variable remuneration are the Executive Chairman and the Chief Executive Officer.' Their annual bonus is subject to the achievement of clear objectives, which are disclosed ex post due to the strategic sensitivity of the targets set. For FY 2024, the metrics related to sustainable development goals for the Executive Chairman (weighted at 300 out of 1000, with economic/financial objectives accounting for the remaining 700) are: Diversity and inclusion (75 out of 1000); Presence on international indices (150 out of 1000). The sustainable development goal-related metrics for the CEO in 2024 (weighted at 100 out of 1000) are: Diversity and inclusion (50 out of 1000); Safety, health, and well-being (50 out of 1000). [Annual report on remuneration of directors and officers. Year 2023, 2024: iberdrola.com]
A.5	Responsible lobbying and political	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Company states that 'As regards lobbying

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	engagement fundamentals		<p>activities, Iberdrola is registered with the Transparency Register created by European institutions to provide adequate transparency to the relations of such institutions with companies, NGOs, citizens' associations, think tanks, etc. [...] Iberdrola has a neutral position from a political standpoint'. On its website, Iberdrola has its statement on Public Affairs, which declares: 'The Iberdrola Group is firmly committed to sustainable development, respect for Human Rights and the fight against climate change. [...] We advocate and promote collaboration between governments, institutions and organizations to accelerate the energy transition and the decarbonization of the economy and conduct all of our advocacy in line with the objectives of the Paris Agreement, under an ambitious approach, to restrict global temperature rise to 1.5°C above pre-industrial levels' Then The Company discloses its participation in different initiatives and describes that 'In this area, the group carries out an annual analysis of the degree of alignment of these organisations with the company's Statement of commitment to sustainable development, respect for and defence of Human Rights and the fight against climate change. The group's professionals responsible for the engagement with each association carry out the alignment analysis, taking into account the extent to which the positions and objectives pursued by these organisations and the activities they carry out are consistent with the aforementioned frameworks'. [Public Affairs (website), N/A: iberdrola.com] & [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Monetary value of direct political contributions: The Company's Sustainability Report discloses that 'In 2023, none of the group companies, with the exception of those in the United Kingdom, the United States and Australia, made financial contributions to political parties'. According to the report, 'In the United States, AVANGRID contributed a total of EUR 482,073 (USD 521,000) to candidates and political parties, reporting these contributions in accordance with applicable law, although this figure is less than that reported last year. These represent the contributions made by the company and do not include additional voluntary contributions from employees'. Avandrig's website discloses that 'Pursuant to its internal Political Education and Contributions Protocol, in 2023, Avangrid had cash contributions in the state level, totalling \$ 521,000. Avangrid did not have any in-kind political contributions in the federal and state levels.'. Additionally, Iberdrola's Sustainability report states: 'In the United Kingdom, ScottishPower contributed a total of EUR 32,761 distributed among different parties across the political spectrum, for the sponsorship of conferences and events, in accordance with the Political Parties, Elections and Referendums Act (2000). These events are an important opportunity for the group to present its views to representatives across all political camps on a nonpartisan basis. This contribution does not signal support for any specific party [...] In Australia, IBERDROLA Australia contributed a total of EUR 2,702 (AUS 4,400) for the annual membership to sponsor conferences and events, reporting it to the Australian electoral commission'. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] & [Press Releases. Financial Contributions to Political Parties (Avangrid website), N/A: avangrid.com] • Met: Monetary value of indirect political contributions: The Company's Consolidated Non-Financial Information Statement (NFIS) discloses: 'In Australia, IBERDROLA Australia contributed a total of EUR 24,086 (AUS 39,484) for the annual membership to sponsor conferences and events, reporting it to the Australian electoral commission. Accordingly, Iberdrola Deutschland has contributed a total of 23,000 euros for the contribution to the professional business association Wirtschaftsrat.' [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com] • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): Although the company submitted feedback for this datapoint, the evidence was not considered material.

B. Embedding respect and human rights due diligence

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B.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The Company's Corporate Sustainable Development and Reputation Committee, 'has the duties of defining the basic corporate lines of evolution of practices focused on the sustainable growth of the social dividend and improvement of the Group's reputation, approving and monitoring the plans for development in both areas, being aware of the most significant advances, and cooperating in the preparation of the public information disclosed by the Company with respect to these areas'.

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			<p>These include human rights. [Governance and Sustainability System, 25/02/2025: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The Company's Human Rights Report discloses: 'Through its Governance and Sustainability System and the Human Rights Governance Model, Iberdrola describes the allocation of responsibilities at the appropriate levels within the group. In addition, to facilitate the integration of the management of Human Rights topics into the day-to-day running of the company, Iberdrola has provided itself with an internal organization and responsibilities with adequate budget allocations and supervision processes that allow it to offer agile and effective responses [...] The allocation of these responsibilities is influenced by the definition of human rights adopted by the group. [...] Therefore, the human rights due diligence system is based on various sub-systems and their procedures. The implementation of those corresponds to different areas (Compliance, Safety and Health, Environmental, Purchasing, Cybersecurity, among others).' [Human Rights Report 2022, N/A: iberdrola.com] • Met: Day-to-day resources and expertise allocation in own operations: The Company's Human Rights Report discloses: 'In order to ensure that the principles relating to respect for human rights are effectively applied group-wide, and that the associated responsibilities are correctly allocated in the sub-holding companies, the teams responsible for dialogue with local communities have been bolstered, especially in areas of potential impact, through training, communication of good practices, and in close coordination with the Iberdrola, S.A. team. This responsibility includes: Identifying potentially relevant issues; Analysis of the components of the Human rights due diligence system and documenting them; Maintaining relations with local and indigenous communities; Ensuring a complete report; Guaranteeing the existence of participation channels, procedures and reporting; Implementing mitigation and compensation measures'. [Human Rights Report 2022, N/A: iberdrola.com] • Met: Resources and expertise allocation in supply chain: Iberdrola's Purchase Report informs: 'The Procurement Division is an active member of the Sustainable Development Committee and is particularly attuned to the demands and interests of suppliers as strategic stakeholders. [...] The Procurement Division at Iberdrola has had the goal of improving the sustainability of its suppliers for more than 16 years, linked to the team's variable remuneration. [...] The current priorities of the Procurement Division are: [...] Sustainability: [...] Transferring it to our supply chain is one of our key activities as a leading company in the market. The Procurement divisions of the businesses and countries have annual targets for improving their suppliers' sustainability. [...] Governance and compliance: The Procurement process must be robust and ensure compliance with the guidelines established in Iberdrola's corporate policies. Procurement support systems make it possible to increase guarantees that the process complies with the established procedures and to identify deviations to take corrective actions. [...] The Procurement organisation is comprised of a centralised management and over 284 professionals strongly rooted in the local community. This enables us to benefit from the talent and proximity to operations of the business areas and corporate fabric of the countries in which we work.' The Report also discloses that 'Buyers have been able to tell their suppliers about the requirements and priorities in terms of sustainability, and in some cases, they have even had to carry out educational work in order to explain some of the elements of the Group's evaluation model and even advise in which possible lines of action they could begin to reach the required level.' Also, the Regulations of the Compliance Unit state: 'The Unit shall be supported by the division in charge of the procurement function in the dissemination of the Code of Ethics among the suppliers.' [Procurement and Supplier Management activity report 2022-2023, 06/2023: iberdrola.com]
B.2	Identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations: The Company's Human Rights Report discloses that 'In order to identify the actual and potential impacts on human rights, Iberdrola undertakes detailed analyses that are carried out by independent experts, as well as substantial consultations with potentially affected Stakeholders, paying special attention to any vulnerable groups that may be exposed to greater risks, as established by the UNGPs [...] In 2019 [...] Iberdrola commissioned an independent expert organization to identify actual and potential impacts as the first phase of a broader analysis of its due diligence system. The methodology for identifying potential impacts considered the operational context (country risk) as well as the activity sector (sector risk) in accordance with the recommendations of the UNGPs and their Interpretative Guide. This process included all the countries the company operates in, including the five main

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			<p>subsidiaries of the group and the countries where it carries out procurement. The annual review of the Human rights risk map of the Iberdrola group in 2021 was carried out by an independent expert organization, that incorporates the particularities of Iberdrola's specific activity, identifying impacts in a manner that is better adjusted to the company's activity in each country that is analyzed.' [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Describes process for identifying risks in business relationships: The Company's 2022 Sustainability Report declares that 'Iberdrola understands the Human Rights Due Diligence System as an ongoing process intended to identify and manage the risks and impacts associated with the performance of all phases of its operations (planning, construction, operation, maintenance, and closure of electricity and energy sector facilities), considering the geographic and social context and the characteristics of its supply chain.' [Sustainability Report 2022, 24/02/2023: iberdrola.com] • Met: Describes risk identification system incl. stakeholder consultation: The Company's 2022 Human Right Report states that 'As a consequence of adopting of a broad definition of human rights, which entails a great diversity of issues and potential impacts, the group's Human rights due diligence system is supported by various subsystems and their corresponding procedures (for example, Compliance, Health and Safety, Environmental, Purchasing, Cybersecurity, among others), which handle the matters they are responsible for. Annually, it is assessed that these subsystems adequately cover these issues from a human rights perspective. The ultimate goal is to facilitate autonomous and efficient management of each area consistent with an integrated and cross-cutting vision of all human rights issues [...] In order to identify the actual and potential impacts on human rights, Iberdrola undertakes detailed analyses that are carried out by independent experts, as well as substantial consultations with potentially affected Stakeholders, paying special attention to any vulnerable groups that may be exposed to greater risks, as established by the UNGPs.' In regards to the mentioned 'substantial consultations' the Report also states: 'Dialogue with Stakeholders is another main source of information for identifying impacts. This is carried out in the context of regular operations and through specific one-off consultations. The implemented Global Stakeholder Engagement Model is an internal tool that promotes continuous dialogue and facilitates the analysis of its outcomes and subsequent decision-making.' In addition, about the independent experts the Report discloses that 'The annual review of the Human rights risk map of the Iberdrola group in 2021 was carried out by an independent expert organization, that incorporates the particularities of Iberdrola's specific activity, identifying impacts in a manner that is better adjusted to the company's activity in each country that is analyzed.' [Human Rights Report 2022, N/A: iberdrola.com] • Met: Describes how risk identification system is triggered by new circumstances: The Company's 2022 Sustainability Report discloses: 'Environmental Impact Assessment studies prior to the construction of facilities include a Social Impact Assessment in accordance with current law in each of the countries, and must be approved by the competent public authorities [...] These evaluations include an analysis of potential impacts on human rights, such as the right to a safe, clean, healthy and sustainable environment, through an evaluation of the natural environment.' [Sustainability Report 2022, 24/02/2023: iberdrola.com]
B.3	Assessing human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks: The Company's 2022 Sustainability Report declares: 'Iberdrola has a human rights risk map that covers both the country in which the group operates and those from which it obtains its supplies. The map is updated on a regular basis through independent external specialists. Unlike other generic indices on the market, it allows the risks specific to the energy sector to be weighted and supplemented with the particular characteristics of Iberdrola's activities, providing results more closely aligned with the company's reality. The results of the risk map are cross-checked with the list of the main locations of operation to identify those facilities where there may be a greater risk of human rights violations [...] Iberdrola carries out a human rights risk analysis at 100% of its main locations of operation (259 locations of operation). The result of this analysis in 2022 showed that 60% of these locations, in the United States, Brazil, Mexico and Greece, present possible risks in one or more of the following human rights issues: labour conditions; environmental impact; occupational safety and health; public safety; indigenous peoples; and lands and property.' Also, see evidence for indicator B.2.1. [Sustainability Report 2022, 24/02/2023: iberdrola.com] • Met: Describes how process applies to supply chain: The Company's 2022 Human Rights Report states that 'Iberdrola understands the Human Rights Due

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			<p>Diligence System as an ongoing process intended to identify and manage the risks and impacts associated with the performance of all phases of its operations [...], considering the geographic and social context and the characteristics of its supply chain.' Also see above. [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of results of HRs risk assessment: In its 2022 Human Rights Report, the Company discloses: 'According to [...] the Stakeholders consulted, the main relevant human rights issues for Iberdrola are: Labor practices; Local communities and the rights of indigenous peoples (including the environment); Cybersecurity and information privacy; Public insecurity and labor practices in the contracting of security services.'. Also, the Company's 2022 Sustainability Report informs the following: 'Based on the Iberdrola group's risk map for 2022 drawn up by BHR (a specialised consulting firm), and taking into account the suppliers of goods and services from countries identified in 2022 as being at high risk of human rights violations, the following risks may emerge: in connection with the risk to freedom of association and collective bargaining, in 1.5% of the volume of purchases made in 2022, in connection with child labour, in 0% of the total volume of purchases made in 2022, and in connection with forced labour, in 1.5% of the total volume of purchases made. With regard to fuel supplies, no purchases were made in countries where there is a risk of violation of the rights to freedom of association and collective bargaining, child labour and forced labour. There was no identification in 2022 of any contracting with suppliers that has generated incidents relating to freedom of association, collective bargaining, or the use of child or forced or compulsory labour, nor is there evidence of receiving complaints on these grounds.' [Human Rights Report 2022, N/A: iberdrola.com] & [Sustainability Report 2022, 24/02/2023: iberdrola.com] • Met: Describes how assessment involved affected stakeholders: Previous evidence used to award this subindicator has exceeded the three-reporting-year timeframe. The Company's 2023 Sustainability Report discloses that its Stakeholder engagement model 'aims for all areas and businesses of Iberdrola to have an in-depth understanding of their Stakeholders; have suitable channels for communicating with them; analyse their expectations, and establish appropriate action plans to minimise and mitigate those potentially negative impacts while maximising the potentially positive ones (with the related risks and opportunities for the Company). The model considers 'the potential negative and positive impact of significant events on Stakeholders. This last aspect was introduced in the Model, taking into account the latest reporting trends and standards'. However, no specific details were found on how affected stakeholders were consulted as part of the human rights/saliency assessment process. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com]
B.4	Integrating and acting on human rights risks and impact assessments	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes system to prevent, mitigate and remediate HRs issues: The Company's 2022 Sustainability Report indicates that 'After identifying the potential impacts, Iberdrola triggers measures to prevent and mitigate them, which are horizontally integrated across all levels of the company. However, even valid risk prevention systems are unable to prevent adverse impacts in all cases. For this reason, when the due diligence system detects an actual negative impact, mitigation plans are implemented to reduce the magnitude of the impact.' In addition, the 2022 Human Rights Report dedicates a section to the integration of human rights measures for employees, communities, and the supply chain, including working conditions (salary, safety and health, mental health), diversity and inclusion, security in power grids, population displacement, access to natural resources, and indigenous peoples. Regarding the supply chain, the integration of measures is described in relation to its management and risk assessment, modern slavery and forced labour and the hiring of security services. It also describes mitigation plans for employees, suppliers, and communities in the vicinity of the facilities. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Human Rights Report 2022, N/A: iberdrola.com] • Met: Describes how global system applies to supply chain: The 2022 Sustainability Report also states: 'In the area of Labour Practices, Iberdrola has also taken action to ensure that the labour practices adopted in its supply chain make it possible to prevent or mitigate the impacts identified. Thus, the company has integrated various factors to ensure respect for human rights in the various stages of its engagement with its suppliers, together with other support and training initiatives for their improvement [...] Within Labour Practices, other relevant issues are modern slavery and forced labour, which are some of the most serious human rights impacts that may arise, both regarding company employees and those in its supply chain. The group pays special attention to the potential risk of forced labour, due to its seriousness and to the fact that ScottishPower is bound by the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>UK Modern Slavery Act and Iberdrola Australia is bound by the Commonwealth Modern Slavery Act. For this reason, in 2022 the company modified its Policy on Respect for Human Rights to specifically state its commitment on this matter.' [Sustainability Report 2022, 24/02/2023: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Example of actions decided on at least 1 salient HRs issue: The human rights report provides a description of actions related to the topics mentioned in the previous sub-indicator. For instance, in China- where the Company has identified there is a high risk of forced labour- 'Iberdrola is asking its suppliers to take extraordinary measures to guarantee the absence of forced labor. In order to identify the origin of the materials and components of the solar modules and, in particular, of polysilicon, Iberdrola is implementing the following measures: Express declarations from suppliers rejecting forced labor (in addition to acceptance of them Iberdrola Code of ethics); Confirmation by suppliers that they do not use polysilicon or other components originating from the Uyghur Region; Traceability mechanisms of the components incorporated in the solar panels; [...] In the photovoltaic panel purchase contracts, Iberdrola is currently negotiating the inclusion of the right to carry out, through an independent third party, inspections to audit the traceability of the supply and to ensure knowledge of the origin of the materials despite the difficulties that this exercise entails in this territory'. The company also reports on actions taken in stakeholder initiatives in the United States and Europe regarding this issue. [Human Rights Report 2022, N/A: iberdrola.com] • Met: Describes how stakeholders involved in decisions about actions taken: While the company claims to have developed a stakeholder engagement model to gather information for the due diligence system, there is no information available on how they have consulted with the affected stakeholders regarding the actions to be taken to address the relevant human rights aspects. The Company states: 'In order to better manage and mitigate the impact on the communities in which the group has a presence, Iberdrola has a Guide for the implementation of good practices in relations with local communities, which ensures that public consultation processes are in line with UNGP recommendations. To implement this guide, areas have a digital tool that facilitates the management and documentation of consultations with communities. Both tools promote better management of the process, thus making it possible to efficiently monitor the steps set forth in the action, mitigation and remediation plans with respect to any impact in the vicinity of the facilities'. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Human Rights Report 2022, N/A: iberdrola.com]
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes system for evaluation effectiveness of actions: The Company's 2022 Sustainability Report states: ' Iberdrola has also implemented a system to monitor the due diligence measures adopted, allowing for examination of the way in which the company has responded to an impact, and whether this response served to prevent and mitigate it and the extent to which it did so. To achieve this goal, regular assessments are carried out through internal monitoring of all relevant human rights information, independent experts are consulted, and quantitative and qualitative indicators are used to specify potential improvement actions. This monitoring is based on internal and external sources of information, including ethical mailboxes and channels for complaints and grievances, among others. 'In addition, the Company's 2022 Human Rights Report states: 'In order to track the effectiveness of its prevention and mitigation measures, Iberdrola has implemented a series of mechanisms that allow active listening to potentially affected parties and the assessment of its mechanisms by independent parties. These systems allow Iberdrola to track the effectiveness of its responses.' [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Human Rights Report 2022, N/A: iberdrola.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions: The Company provided BHRRC with the following evidence from its 2024 Sustainability Report: 'In 2024, the Company developed and began implementing a Social Management and Community Relations Procedure to be applied to the projects and operations, which will apply to the Group companies in accordance with the established governance model. The procedure was drawn up to ensure that there are sufficient elements in the different procedures applied by the Group companies to identify, assess, manage and document the community's perspective on the adverse impacts and benefits of the operations in the different phases of a project (development, construction, operation and maintenance, decommissioning). Based on this assessment, the procedure allows Social Management and Community Relations Plans to be developed and implemented, where necessary, to prevent, mitigate or compensate the impacts identified in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>collaboration with the affected communities, following methodologies inspired by the IFC standards of the World Bank...' However, the genesis of this procedure within its broader human rights due diligence remains unclear. This sub-indicator seeks evidence of an example of lessons learned following the implementation of action plans to manage a specific salient human rights issue. [Norte Energia Sustainability Report 2022, 2023: norteenergiasa.com.br] & [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: Involves stakeholders in evaluation effectiveness of actions: The Company provided BHRRC with the following evidence: 'In addition, specific communication channels have been established for the projects and, in any case, the general complaint and whistleblowing channels described above are always available [...]. This communication with the affected communities serves to help identify and develop different mitigation measures by taking into account their expectations and needs.' The provided evidence continues to disclose cases in which the Company adapted some projects designs to 'integrate stakeholder expectations'. However, on whether the Company consults with affected stakeholders in order to evaluate effectiveness of actions taken. [Human Rights Report 2022, N/A: iberdrola.com] & [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]
B.6	Communicatin g on human rights impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Provides one example of comms with stakeholders: The Company provides some examples of how it communicated with affected stakeholders on specific topics raised by them, including through public consultation processes and surveys, depending on the project. It states that 'For the Cieleśnica solar project in Poland, the scale and location of the project was changed based on a series of public consultations with affected communities during which they requested that the plant be built further away from their homes'. 'For the Broadsound solar and battery project in Australia, consultations were carried out to reduce the risk of cultural heritage impacts and increase acceptance of the project by the Barada Kabalbara Yetimarala (BKY) Aboriginal people identified as the traditional owners of the land. These surveys were the basis for the implementation of a Memorandum of Understanding (MoU) in addition to the Cultural Heritage Management Agreement'. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] & [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com] • Met: Describes challenges to effective comms and how it is working to address them: The Company's Stakeholder Engagement Policy declares that two of the main characteristics of its 'Global Engagement Model' is that [1] 'It contains the guidelines to ensure that the Stakeholders have sufficient capacity to communicate with the Company, through regular evaluation of the available channels and the characteristics thereof (number, type and frequency of use) by the persons in charge of them. The channels are constantly evolving to adjust to the needs and realities of each moment and to maximise their effectiveness in establishing close, robust and long-lasting relationship' and [2] 'It contains the main guidelines to design and monitor action plans that respond to issues that are significant for the Stakeholders based on an assessment of the risks and opportunities thereof, while improving communication and relations therewith.' Also, the Company presented additional evidence about Norte Energia's (Subsidiary in Brazil) YADE Project: 'The Yāde Project – Communication for All – aims to strengthen communication between the Company and the indigenous populations in the venture's area of influence. The project consists of translating Company communications into indigenous languages of the Macro-Jê, Tupi, and Karib language trunks and families, spoken by the nine ethnic groups in the region. It was set off in April 2020, when Norte Energia started translating official Covid-19 health protocols into the languages spoken in the villages, aiming to broaden access to information. From then on, taking into account the indigenous cultural differences, new types of announcements were added to the program, since those written in Portuguese were well understood only by the indigenous leaders and the younger population in the villages who spoke the language. Once translated, the announcements are included in the agenda of the indigenous radiophone system maintained by the Company's Indigenous Communication Program (PCI)...' [Norte Energia Sustainability Report 2022, 2023: norteenergiasa.com.br] & [Governance and Sustainability System, 25/02/2025: iberdrola.com]

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company's Human Rights Policy states: 'To achieve the aforementioned goals and commitments, the following main principles that must govern the conduct of the companies comprising the Group in all areas are adopted and promoted at the Group level: [...]Have in place reporting and grievance mechanisms, equipped with adequate guarantees and settlement procedures, in order to respond to potential violations of human rights. These mechanisms must be sufficiently communicated both to the professionals of the Group's companies and to persons and organisations outside of the Group. To this end, appropriate internal reporting procedures regarding the issues communicated shall be defined in order to allow for an evaluation of the due diligence systems.' [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com] • Met: Grievance mechanism available in appropriate languages and workers made aware: The Company's 2022 Sustainability Report reveals that 'Training and communication are two fundamental pillars of the Compliance System to ensure that all of its professionals are aware of and comply with the Code of Ethics. Within this context, the Compliance Unit and the compliance divisions plan their training and communication activities on an annual basis in collaboration with the corresponding human resources and communications divisions.' The Company describes multiple thematic communication channels for each stakeholder group to make complaints or inquiries. The non-financial statement indicates that 'The main consultation and complaint mechanisms available are the universally accessible ethics mailboxes on the websites of the country sub holding companies and the complaint mechanisms at the project facilities in the local language so that they are easily accessible to the affected communities'. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com] • Met: Describes how workers in supply chain access grievance mechanism: Iberdrola's Suppliers Code of Ethics reveals that 'In order to create an environment of transparency and to foster respect for the law and the rules of conduct established in the Code of Ethics by its directors, its professionals, and its suppliers, and in accordance with applicable legal provisions, the Company has established an internal reporting system as provided for in the Compliance and Internal Reporting and Whistleblower Protection System Policy as a channel to encourage the reporting of potentially improper conduct or acts that are potentially illegal contrary to law or the Governance and Sustainability System, and particularly the rules of conduct of this Code of Ethics. [...] The aforementioned internal reporting system provides the directors, professionals and suppliers (including Subcontractors and their respective professionals) of the Company, as well as shareholders and the other third parties provided for in Law 2/2023 of 20 February Regulating the Protection of Whistleblowers and the Fight against Corruption, with appropriate internal reporting channels for them to report any conduct or act of the kind indicated in Articles C.3.1.p), D.2.2 and E.2.9 of this Code of Ethics, respectively, in relation to the Company, without prejudice to the ability of all of them to address their communications to the Spanish Independent Whistleblower Protection Authority (Autoridad Independiente de Protección del Informante) (A.A.I.) or to any other competent institution, body or entity.' In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Suppliers' Code of Ethics, 06/2024: iberdrola.com] • Met: Expects business relationships to convey expectation to their business relationships: See above. [Suppliers' Code of Ethics, 06/2024: iberdrola.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company's Human Rights Report discloses: 'Iberdrola has established grievance mechanisms, both at the operational and company level, with the aim of identifying adverse impacts, taking the adequate measures and, where appropriate, providing early and directly remediation for adverse impacts and preventing abuses from becoming exacerbated and grievances from escalating. These channels allow those who may be adversely impacted (local communities, workers, suppliers or any other Stakeholder) to bring their concerns, complaints or claims to the company. There are several types of complaint and grievances mechanisms for human rights issues: Ethical web/intranet mailboxes: worker mailbox and supplier mailbox (owned by the Compliance Unit); Facilities complaint and claim channels: face-to-face, by telephone, mail or through the installation; website (owned by the corresponding site); Corporate mailboxes (owned by the corresponding area or business); Judicial and/or administrative claims, which are

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>sent to the Legal Services of the challenged company'. [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company's website states: 'Iberdrola maintains relationships with communities during all phases of a project and establishes dialogue channels through which the communities can communicate their expectations and needs. Iberdrola continuously strengthen its involvement among the communities in which it operates through a Stakeholder Engagement process aligned with the principles set in the Stakeholders Engagement Policy and aimed at identifying potential human rights impacts and creating sustainable value for all. Stakeholders at project level may include potentially affected communities or individuals, as well as their formal or informal representatives, among others. Special attention is given to vulnerable groups including Indigenous peoples.' Additionally, the 2023 sustainability report declares: 'during the planning development phase of each project, relations are established with local communities, authorities, and any other stakeholders that may be relevant to the project, and dialogue channels are established with them. These channels supplement those available in the Environmental Management System allowing Stakeholders to send their concerns, complaints, requests for information or any other kind of request to minimise impacts in the area.' It is presumed that the channels are available in the appropriate languages, as they are established for each project at the local level. [Added value: social dividend (website), N/A: iberdrola.com] & [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Describes how external individuals/communities access grievance mechanism: The Company's Human Rights Report states: 'Iberdrola has established grievance mechanisms, both at the operational and company level, with the aim of identifying adverse impacts, taking the adequate measures and, where appropriate, providing early and directly remediation for adverse impacts and preventing abuses from becoming exacerbated and grievances from escalating. These channels allow those who may be adversely impacted (local communities, workers, suppliers or any other Stakeholder) to bring their concerns, complaints or claims to the company.' Additionally, the Supplier's Code of Ethics mandates that when suppliers contract with a Company within the Group, they 'undertake to inform their professionals and their Subcontractors [...] of the existence of the internal reporting channels set forth in the Compliance and Internal Reporting and Whistleblower Protection System Policy, as well as to require their Subcontractors to inform their professionals thereof.' Nevertheless, this subindicator looks for evidence that suppliers' and other business relationships' external stakeholders (such as local communities at suppliers') are able to file complaints in relation to suppliers' behaviour or impacts. The Company provided BHRRC with additional evidence regarding this sub-indicator: 'Through Article D.2. Suppliers' Compliance Commitments of its Code of Ethics, Iberdrola requires its suppliers and contractors to inform their employees of the availability of the communication processes and channels established from the beginning of the contractual relationship.' However, it is not clear how the Company ensures that its suppliers' external stakeholders have access to appropriate grievance mechanisms. [Human Rights Report 2022, N/A: iberdrola.com] & [Suppliers' Code of Ethics, 06/2024: iberdrola.com] • Not Met: Expects business relationships to convey expectation to their business relationships: The code for suppliers states that 'Suppliers shall inform their professionals and the Subcontractors of the existence of a complaint mechanism of the corresponding company of the Group. They shall also require their Subcontractors to inform their professionals thereof'. The supplier management activity report indicates that 'the Group requires its suppliers to establish the necessary mechanisms for their professionals and third parties to submit complaints or claims anonymously in the event of possible human rights violations. as well as informing them of the internal information channels of the Group through which to report any practice contrary to the principles of the Code of ethics'. However, no evidence found of the access being made extensive to external stakeholders down the chain. [Code of Conduct for Directors, Professionals and Suppliers, 25/03/2025: iberdrola.com] & [Procurement and Supplier management activity report 2023-2024, 06/2024: iberdrola.com]
C.3	Remedying adverse impacts	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes approach taken to remedy adverse HRs impacts: The Company indicates that 'The Ailes Marines consortium, 100% owned by Iberdrola, is in charge of the development, construction and operation of the offshore wind farm in the area defined by the French Government in the Bay of Saint Brieuc off the coast of Brittany. The company has implemented all possible measures to avoid and reduce

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>any inconvenience to fishermen. However, the unavoidable exclusion of the fishing companies from the construction zones constitutes a damage that Iberdrola intends to compensate. Since May 2021, a sequence of actions has been launched to reduce the impact of the project on fishing activity. To facilitate the accompaniment of the affected fishing professionals, Ailes Marines has independent expert support to reach the necessary consensus. Iberdrola have set up a freely accessible web page that contains information on the project, as well as the mitigation and compensation measures deployed. There is a specific space for the beneficiaries of the financial compensation measures for the fishing sector. The implementation of these measures is subject to consultations with fishermen's committees, institutions and fishing industry organizations. The company has set up a compensation system to help address the challenge of resolving the damage suffered by the fishing companies, which are significantly restricted in their activities as a result of the construction of the wind farm'. Then the Company describes the steps followed by the system. [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company's Human Rights Report discloses: 'The right to the highest attainable standard of physical and mental health is a fundamental human right that is indispensable for the exercise of other rights. In the context of COVID-19 especially, but even before, mental health has been a major focus for ScottishPower. The company has developed extensive worker surveys on mental health issues and has established a worker assistance helpline and offers training for mental health first aid in a work environment that encourages an open and nurturing conversation on workers wellbeing'. However, it is not clear if the Company has caused or contributed to those adverse impacts mentioned, which is the focus of this sub-indicator. No further evidence found during last review. The Company has provided feedback to this indicator. However evidence refers to how it improves grievance mechanisms rather than how it changes practices that led to specific impacts. [Human Rights Report 2022, N/A: iberdrola.com] • Met: Describes approach to monitoring/implementing agreed remedy: The Company states that it 'ensures that these actions are effective through monitoring processes that are part of the communication plans, specific impact management plans such as noise management plans, biodiversity plans, etc. For example, at the Cofrentes nuclear project in Spain, an Information Committee was established in which representatives of the affected communities could participate and share the impact that the facilities have on the communities. These meetings allow the communities to communicate the changes and their concerns about any potential additional adverse effects that may arise. In addition, action plans with relevant measures are determined and monitored at these meetings [...] At the Saint-Brieuc offshore wind farm in France, a freely accessible website has been set up to provide information on the project, and on the mitigation and compensation measures deployed. There is a specific space for the beneficiaries of the financial compensation measures for the fishing sector. The implementation of these measures is subject to consultations between fishermen's committees, institutions and fishing industry organisations. In addition, a compensation system has been established to help address the challenge of redressing the harm suffered by fishing companies subject to a significant restriction of their activities linked to the construction of the wind farm'. [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Policy of human rights states that: 'The purpose of this Policy is to formalise the commitment of the Company to human rights recognised in applicable legal provisions and to define the main principles of conduct that shall be applied within the Company for due diligence in the area of human rights pursuant to applicable legal provisions and/or [...] the United Nations Declaration on the Rights of Indigenous Peoples, as well as such documents and texts as may replace or supplement those mentioned above'. However, despite mentioning the UN Declaration, there's no direct and explicit commitment to respect the rights of indigenous peoples, as per the methodology criterion, including also both own operations and supply chain. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com] • Not Met: Description of process for identifying indigenous persons and customary lands.: The Human Rights report states that 'Iberdrola understands this term [indigenous peoples] based on international standards resulting from ILO Convention No. 169: Self-identification as indigenous peoples at the individual level and accepted by the community as their member. Historical continuity with pre-colonial and/or pre-settler societies. Strong link to territories and surrounding natural resources [...]'. However, no details were found on the process that the company follows to identify Indigenous peoples and their lands, and the resources they have a right to. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Human Rights Report 2022, N/A: iberdrola.com] • Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company reports that 'a leading sustainable energy company and part of the Iberdrola Group, and the Navajo Tribal Utility Authority (NTUA), the largest multi-utility enterprise owned and operated by a Native American tribe, today announced they have signed a Memorandum of Understanding (MOU) to explore opportunities to develop up to 1 GW of green energy projects within the Navajo Nation in the states of New Mexico and Arizona. This partnership will allow the two parties to collaborate and study the feasibility of developing wind and solar projects, as well as battery storage solutions, to create new jobs, create economic development on the Navajo Nation, offset lost revenue on the Navajo Nation, and bring reliable, affordable, and renewable energy to power Navajo Nation businesses and residents [...] As part of this partnership, AVANGRID and NTUA will explore how the projects being contemplated could benefit from the Inflation Reduction Act ("IRA"), the largest climate investment in the U.S. and global history. The IRA opens a path to meaningful emissions reductions in Indian tribes through the development of projects that can help them transition to a cleaner energy economy'. [Press release: AVANGRID And The Navajo Tribal Utility Authority Announce Plan..., 17/04/2023: avangrid.com] • Not Met: Commitment to FPIC: The Company indicates that 'In the case of Iberdrola Mexico's projects where indigenous communities are present, the company establishes intercultural dialogue and the corresponding consultations of free, prior, and informed consent (FPIC) in accordance with Mexican law and the international standards set out in corporate regulations. Thus, in Mexico, the right of indigenous peoples to FPIC is recognised in a set of regulations, such as the Constitution and other secondary laws and various judicial decisions, as well as the international commitments to which the country adheres, such as ILO Convention 169'. However, this sub-indicator seeks evidence that the Company has a commitment to FPIC, including the right to define the process by which FPIC is achieved and to withhold consent, regardless an opposing claim by the government. Current evidence refers exclusively to Mexico. [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]
D.2.PD	Engagement with all affected communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes how local communities identified and engaged in the last two years: The Sustainability Report 2022 states that the initial identification and selection of stakeholders was conducted by the management team. 'For the proper management of each of the Stakeholders, Iberdrola's various areas and businesses identify different subgroups that they deem relevant for more specific treatment. The Company's 'Stakeholder Engagement Model' is 'based on the AA1000 Stakeholder Engagement Standards 2015 [...], the AA1000 Accountability Principles 2018 [...], and its four principles of inclusiveness, materiality, responsiveness and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>impact'. The report shows a graph that describes the process and states 'this process is implemented in the management of Iberdrola's eight Stakeholder group in the five main countries and at most of the Generation and Sustainable Energy facilities, as well as in the various geographic areas of the Networks business'. The model considers three points of view 'impact of reputational risks on Iberdrola; the impact of these action plans on Stakeholders; and the impact of significant events on stakeholders'. It also indicates that it keeps the relationship channels with its Stakeholders updated and makes continuous efforts to identify the issues that are most important to each of them. An analysis of these issues shows that, while there are issues exclusive to each geographical area, most are common to Iberdrola's five main countries. The company also identifies best practices in relation to Stakeholders, which are shared by the entire group'. The Human Rights report shows engagement with local communities in the UK, USA and Mexico in an impact/monitoring context. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Provides two examples of engagement with communities: AVANGRID's press release discloses: 'AVANGRID [...] and the Navajo Tribal Utility Authority (NTUA), the largest multi-utility enterprise owned and operated by a Native American tribe, today announced they have signed a Memorandum of Understanding (MOU) to explore opportunities to develop up to 1 GW of green energy projects within the Navajo Nation in the states of New Mexico and Arizona'. The Company's sustainability report discloses that 'In Brazil, in the north of the state of Sao Paulo (Mongaguá), various actions are being carried out in the territory of the Tekoá Mirim indigenous community, which is impacted by the extension of an electricity transmission line. These actions will be identified in the Indigenous Component Study (ICS) prepared by Neoenergia, taking into account the views of the community. This includes various measures to mitigate the identified impacts, including donating land to the community as part of the land regularisation process carried out during the project's licensing phase, along with other environmental measures.' [Press release: AVANGRID And The Navajo Tribal Utility Authority Announce Plan..., 17/04/2023: avangrid.com] & [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Met: Examples of engagement refer to marginalised groups and provide additional detail: As indicates above, the Company and the Navajo Tribal Utility Authority (NTUA), the largest multi-utility enterprise owned and operated by a Native American tribe, today announced they have signed a Memorandum of Understanding (MOU) to explore opportunities to develop up to 1 GW of green energy projects within the Navajo Nation in the states of New Mexico and Arizona.' Vineyard Wind, a subsidiary of Iberdrola's Group signed a memorandum of Agreement (MOA) with the Bureau of Energy Management (BOEM), the Massachusetts State Historic Preservation Officer and the Advisory Council on Historic Preservation, all three government bodies (at federal and/or state level) related to historical preservation and cultural heritage or in the case of the BOEM to managing the exploration and development of energy resources on the Outer Continental Shelf (OCS) of the United States. The MOA includes agreed actions to resolve adverse visual and physical effects to identified historic properties. The Consultation Process to decide those mitigating actions was outlined by the government bodies as it was the identification of stakeholders (Delaware Tribe of Indians, Mohegan Tribe of Indians of Connecticut, the Narragansett Indian Tribe, the Shinnecock Indian Nation, and the Wampanoag Tribe of Gay Head-Aquinnah) In this regard, the MOA document states: 'Vineyard Wind will provide Tribal representatives with the opportunity to be present for all stages of work, including core collection, core opening, and core sub-sampling. Vineyard Wind will send formal invitations to the consulting Tribes with schedules for the mitigation study activities. In the interest of collaboration, a communication matrix will be distributed for key team members who are available all the time for consultation, questions, and information requests. Vineyard Wind will hold these meetings in person unless public health or safety considerations warrant remote meetings. The specific timeframe for the consultation process will be defined in the future, but will include a study kick-off meeting, a pre-field planning meeting, a field mobilization vessel tour, a post-field program core sample review, and a study results meeting;' Furthermore, the Company states that for the Hollandmeyer Renewable Energy Development in the UK 'SPR has kept the four Community Councils local to the proposed Development and the local councillors from the Wick and East Caithness and Thurso and Northwest Caithness electoral wards informed of project progress. SPR also sent emails to the Community Councils and local community councillors to introduce the proposed Development in July 2020, invite them to participate in the PIEs in October 2020 and January 2021

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Human Rights Report 2022, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.PD	Benefit and ownership sharing policy	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to identify benefit and ownership sharing: Iberdrola's CONVIVE Programme 'integrates specific actions for each project and its location, as well as global actions. There are 3 main areas of action: [1] Contributing to socio-economic development: Initiatives that enable the projects' contribution to economic and social development at the local as well as national level...' Also, Iberdrola's subsidiaries, ScottishPower and Iberdrola Australia, have in place Community Energy Funds. However, it is not clear if the Company has a general commitment to identify benefit and ownership sharing models. Although the company submitted feedback for this datapoint, the evidence was not considered material. [CONVIVE Programme- Iberdrola's website, N/A: iberdrola.com] • Met: Commitment includes right to decide own priorities for communities: Scottish Power has in place Community Energy Funds in the UK: 'ScottishPower Renewables empowers communities to determine how community benefit funds they receive from its operational windfarms will best address local needs. Our funds can be used to deliver a wide range of local initiatives to improve local facilities and services, to enable upskilling and education, to make energy efficiency improvements to community buildings and to deliver heritage and tourism initiatives, amongst many other things. We also support several communities that choose to direct funds towards initiatives to help local people address rising energy costs through a Community Energy Fund. A Community Energy Fund operates by providing households in the local area a contribution towards their energy bills.' Additionally, Iberdrola Australia's website states: 'We aim to foster lasting relationships with community organisations by funding local initiatives and local not-for-profit organisations. Iberdrola Australia sponsors community projects that aim to make a positive difference in the areas of education, fire and police departments, social welfare, country shows, indigenous groups, sports clubs, art festivals and youth programs.' [Community Energy Fund- ScottishPower's website, N/A: scottishpowerrenewables.com] & [Community Funds and Sponsorships- Iberdrola Australia's website, N/A: iberdrola.com.au] • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing: While the Company has provided various items of evidence regarding its projects' contributions to the local economies of the communities in which they are installed (such as tax revenue, lease payments, and social funds), this sub-indicator aims to obtain systematic disclosure of statistics for each of its projects. This disclosure should describe the demographics of the benefits and the ownership-sharing processes, including any final agreements, the percentage of project revenue, and/or equity shares paid to local communities. However, no such evidence was found. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Met: Disclosure how affected communities participated in decision-making: See above, communities decide how community funds are used. [Creating a better future, quicker in South Ayrshire, 05/2022: scottishpowerrenewables.com]
D.4.PD	Local wind & solar energy access, affordability	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Actions taken to support access and affordability of renewable energy in the value chain: The Sustainability report states that 'The companies of the Neoenergia group have continued to develop rural electrification programmes, undertaken jointly with government authorities, as an instrument for the social inclusion and development of rural homes not served by electric utilities. In 2022, the funds allocated to these programmes totalled €88 million (478 million Brazilian reais) in consolidated terms for the group. Globally, Iberdrola has launched the Electricity for All Programme in response to the call of the international community to ensure universal access to affordable, reliable and modern energy services. Iberdrola has set the ambitious goal of providing electricity to 16 million persons who currently lack it by 2030'. The website discloses different projects included in this programme. Mexico, in alliance with Ilumexico, has launched the 'Luces de esperanza' project 'that will bring electricity to 60 rural communities in Mexico [...] thanks to the installation of solar panels in homes, schools, health centres and community areas. The programme carried out in two phases, has an investment of 60 million Mexican pesos and will benefit 12,000 people over the next five years. The Company also discloses information on the 'light for all' project in Brazil undertaken by Neoenergia (Iberdrola) in conjunction with the Federal Government', which ended in 2021.'within this programme, Iberdrola's Brazilian subsidiary has brought electricity to the Indians in the village of Patiburi [...] The

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>initiative benefited 25 families of Tupinambá origin, the first inhabitants of Brazil, and has made the functioning of a school possible, to be attended by some 30 children of the community. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Electricity for all' Programme, N/A: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Public support for government policies addressing energy access: In relation to customers, the Sustainable Development Policy states that 'pay attention to customers who are economically disadvantaged or in any other situation of vulnerability, establishing specific procedures of protection and collaborating in providing ongoing access to energy and gas supply according to the policies established by the competent government administrations in each case'. As indicated above, the project 'Light for all' in Brazil was undertaken 'in conjunction with the Federal Government of Brazil to promote universal access to electricity in rural areas'. Although it seems that the project was supposed to end in December 2021, it is within the last three reporting years' timeframe. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Electricity for all' Programme, N/A: iberdrola.com] • Not Met: Including a timebound actions plan and reporting targets: No information was found on whether targets were developed in consultation with local communities, including marginalised groups at heightened risk of poverty. The Company provided BHRRC with additional evidence regarding this sub-indicator, however, it remains unclear whether targets were developed in consultation with local communities.

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy commitment to respect land ownership/natural resources: The Biodiversity policy includes among its principles to 'avoid locating new infrastructure projects in spaces that are protected due to their ecological, biological, cultural and/or landscape value or areas catalogued as having high value for biodiversity'. The Human rights report also mentions land rights and the right to private property in the context of potential impacts description. Finally, regarding population displacement, it states that 'during the planning phase of new projects, Iberdrola makes an assessment of the land that will potentially be occupied by activity, opting for those that involve less displacement of people. The Company analyses the economic, environmental and social consequences of the project in collaboration with the Public Administrations, and consults with the local communities to define the appropriate corrective measures.. The Company indicates that 'During the planning phase for new projects, Iberdrola evaluates the land that will potentially be occupied, choosing the land that involves the least displacement of people who either reside in the immediate area or whose economic activities will be affected. In the event of displacement, Iberdrola and the relevant government authorities review the economic, environmental and social consequences of the projects, and jointly hold consultations with the local communities to adopt suitable corrective measures. In addition, in the case of indigenous communities, pathways of dialogue are established with the participation of the government and of various organisations representing them, to report on the projects with the required transparency and integrity'. However, no public policy commitment was found to respecting legitimate tenure rights, including where land and ownership rights are customary and/or non-formally recorded. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Biodiversity Policy, 19/03/2024: iberdrola.com] & [Human Rights Report 2022, N/A: iberdrola.com] • Not Met: Identification of legitimate tenure rights holders: The Company indicates that 'The main community impact management plans include environmental impact management plans with social impact, community engagement and communication plans, socio-cultural heritage management plans, archaeological management, livelihood restoration, land and easement acquisition, social and environmental investment plans and indigenous peoples' plans, as well as labour and health and safety plans, among others. These management plans deploy numerous types of actions, [...] During the planning phase for new projects, there is an assessment of the land that may be occupied, choosing land that involves less displacement of people who either reside in the vicinity or whose economic activities are affected. If this ultimately occurs, the companies of the Group and the relevant governmental authorities analyse the economic, environmental, and social consequences of these projects, and jointly hold consultations with the local communities to define suitable corrective measures. In addition, in the case of indigenous communities, channels of dialogue are

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>established with the participation of the State and the various organisations that represent them, in order to provide information on the projects with proper transparency and integrity'. However, no evidence was found on the process by which the Company identifies stakeholders and people with whom to engage. [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: Extends expectation to business relationships: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose: Although the company submitted feedback for this datapoint, the evidence was not considered material.
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: The Human Rights Report states: 'During the planning phase of new projects, Iberdrola makes an assessment of the land that will potentially be occupied by the activity, opting for those that involve less displacement of people. The company analyzes the economic, environmental and social consequences of the project in collaboration with the Public Administrations, and consults with the local communities to define the appropriate corrective measures. Likewise, in the case of indigenous communities, channels of dialogue are established with the participation of the State and different organizations that represent them, to report with due transparency and integrity on the project and its effects, and to carry out the necessary consultations'. However, no evidence was found to indicate a commitment to follow IFC PS5. Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not include an explicit commitment to follow IFC PS5. [Human Rights Report 2022, N/A: iberdrola.com] • Not Met: Description of compensation for resettlement: Iberdrola's 2023 sustainability report discloses that in 'In the construction of the Tâmega hydroelectric complex (Portugal), detailed socio-economic studies have been conducted for several years on the possible affected dwellings [...] The identification of displacements as necessary and the respective financial compensation were made in accordance with the law on expropriations in Portugal and the methodology implemented regarding the management and definition of displacements and potential economic damages. In addition, in partnership with the Portuguese government and the municipalities, as approved in the Socio-economic Action Plan, financial compensation of EUR 1.4 million was determined in addition to the compensation provided in the expropriation process, making it possible to improve the relocation conditions of the affected families and maintain their customs and traditions [...] In the United Kingdom, 98 economic displacements took place in a variety of locations, mainly as a result of geophysical surveys or research studies. These displacements affected 57 fishermen (66 boats) in the East Anglia ONE North and East Anglia 2 projects and 11 fishermen in Machair. In addition, 29 fishermen in Marran and Campion and one landowner on the East Anglia 3 lands were temporarily displaced. These types of economic displacements have also taken place in France, where 68 fishermen were affected in the context of the Saint Brieuc project. All of them received compensation, according to the approved scheme. In Brazil, two electricity transmission network projects required the physical displacement of six people affected by the easement zone: two people in Morro do Chapéu and four people in Vale do Itajaí, all of whom received the corresponding financial compensation'. However, no evidence was found that the Company describes its valuation methods and includes rights holders in determining the valuation. Although the company submitted feedback for this datapoint, no evidence was found of missing evidence. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects): See above. The Company discloses that, regarding the 'Tâmega hydroelectric plant', 'until 2021, 51 homes have been relocated, 39 during the year [...] For the years 2022 and 2023, 8 more families will be relocated'. Neoenergia's sustainability report, discloses that 'there were no population displacements in 2022'. No further details were found on other existing and planned projects. During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator: 'Some of ScottishPower's onshore wind projects (Whitelee, Carrick, Eucharhead and Earraghail) are an example of this practice, having already identified 7 potential physical and/or economic displacements.'. However, no further statistical details about the Company's other existing and planned projects were disclosed. [Human Rights Report 2022, N/A: iberdrola.com] & [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement: During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however the evidence was not material.

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens • Not Met: How stakeholders are involved in the process to mitigate risks
F.2.PD	Evidence of security provider human rights assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Description of implementation of security approach and example: The Sustainability report states: 'The hiring of security services with potential impacts on the physical safety of communities is another significant risk identified by Iberdrola. The company has a Corporate Security Policy, as well as various procedures to ensure that its implementation is compatible with the applicable regulations. It has also specified protocols of conduct for all the activities provided by the Security Division. This management approach goes hand in hand with other actions, as well as with a significant effort in training for own and subcontracted personnel performing security activities [...] The Corporate Security Policy approved by Iberdrola's Board of Directors and the specific procedures adopted by the Corporate Security Division for each situation and country are compatible both with international human rights standards and the laws of the countries where the company is present. The protocols of conduct are defined and implemented in all activities and services provided by the Corporate Security Division, with a Quality Management System that has been certified since 2003 under ISO 9001 and externally reviewed each year by AENOR in the countries where it has been implemented in order to ensure compliance with the requirements of this standard, as well as with the standards of the management system.' The report reveals that in 2023 85.5% of the Company's own security personnel were trained in human rights, and 73,2% of the Company's subcontracted security personnel. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] & [Corporate Security Policy, 20/02/2024: iberdrola.com] • Met: Description of monitoring of business partners: The Company's Sustainability Report states: 'Procurement management of suppliers of security and surveillance services is carried out by the Purchasing Division, through competitive bidding processes in accordance with the applicable procurement policy, model and procedures. The Corporate Security Division is responsible for setting the technical specifications and standards to be met by such suppliers in order to be hired, as reflected in the Global Standard for the Approval of Suppliers, in terms of physical security, resources, training and cybersecurity, as well as the assessment of the suppliers during the performance of their contract. This assessment is performed annually in order to identify areas for improvement. Both the company's personnel and that of subcontractors are qualified for their duties and enhance their knowledge through a rigorous training plan, which is continually assessed and monitored'. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue: The Company indicates that 'At the Brond Brook transmission project in the United States, homeless people potentially affected by the project were identified and a communication protocol was established to provide notification of construction activities, including health and safety instructions. This protocol was developed in conjunction with the police department and local homeless shelters'. However, this datapoint looks for evidence of how, the Company proactively works with affected stakeholders in relation to security and the use of force, following up on local community input about security concerns. [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Statement on OECD Guidance aligned due diligence: The Company indicates that 'impacts on the supply chain arising from the increasing use of metals and minerals for wind and photovoltaic energy generation and storage' are among what the Company considers emerging human rights issues. No further details were found, including whether it conducts due diligence in accordance with OECD Guidance. [Human Rights Report 2022, N/A: iberdrola.com] • Not Met: The policy explicitly covers all minerals • Not Met: Policy expectations of suppliers: The Company's Suppliers Code of Ethics states: 'Suppliers shall respect the human rights and the environmental prohibitions set out in the main international agreements in these areas. In particular, they shall comply with applicable law regarding responsible mineral sourcing.' However, this sub-indicator seeks evidence that the Company has a publicly available policy statement that expects its business relationships to require their business relationships to explicitly follow the OECD Guidance. [Suppliers' Code of Ethics, 06/2024: iberdrola.com] • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.PD	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers: The Company's Procurement and Supplier Management Report discloses that 'At the end of 2023, a new initiative has been launched to better understand certain specific supply chains. The goal is to deepen into the different levels of the manufacturing process applicable to certain equipment supplied for Iberdrola group projects that have a greater potential risk. To this end, and with the support of an external agency, Iberdrola has developed 6 traceability inspections on supplies for ongoing projects related to main teams where there is a human rights risk. The inspections have allowed to map the supply chain of key suppliers at higher levels and to assess the extent to which the supply chain is located in geographical environments with a particular risk in this area.' However, this sub-indicator looks for evidence that the Company identifies and maps all direct and indirect suppliers in its value chain. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Procurement and Supplier management activity report 2023-2024, 06/2024: iberdrola.com] • Not Met: Traceability system for mineral supply chain: The Company's Procurement and Supplier Management Report discloses that 'for certain supplies, according to their human rights risk profile, Iberdrola includes specific clauses in the contracts. Overall, these clauses set obligation such as: [...] Avoid forced labour both in the activities carried out by the supplier and within its supply chain (from the extraction of commodities) [...] Collaborate in social and sustainability audits and traceability audits of the equipment or materials supplied in case Iberdrola wishes to perform them [...] the necessary clauses have also been included in the photovoltaic panel supply contracts to allow the right to conduct social and sustainability audits, as well as traceability audits, both for the manufacturers of the modules and for third party companies in their supply chains, to ensure the quality and traceability of the components [...] Iberdrola has also collaborated through its US subsidiary Avangrid in the Solar Industry Forced Labor Prevention Pledge promoted by the Solar Energy Industries Association (SEIA). Within the framework of this collaboration, progress has been made in the creation of a traceability protocol to identify the origin of commodities and to follow their incorporation in the final products used by the sector, mainly solar modules.' However, no evidence was found that the Company has in place a global and periodic traceability system for its mineral supply chain. Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not describe a traceability system for mineral supply chain. [Procurement and Supplier management activity report 2023-2024, 06/2024: iberdrola.com] • Not Met: Discloses smelters/refiners that are most significant part of supply chain • Not Met: Suppliers in higher risk activities, geographies, products

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.3.PD	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain: The Company indicates that 'the production of minerals is widespread and comes, in large part, from countries with limited governance and traceability frameworks. Therefore, it can be difficult to obtain information regarding labor conditions and risks [...]'. Iberdrola has made progress in implementing policies and procedures to guarantee responsible sourcing, but due to the complexity of its supply chain in some segments, there could be potential impacts related to the extraction of minerals in its value chain and a consequent impact on local communities'. No evidence was found, however, on whether and how it identifies and prioritises risks and impacts in its supply chain. During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however, the evidence was not material. [Human Rights Report 2022, N/A: iberdrola.com] • Not Met: Expectation on suppliers to disclose • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expectation on business partners in value chain to make this commitment • Not Met: Description of how working with HRDs as part of risk assessment and DD • Not Met: Description of how working with HRDs to create safe and enabling environment: Although the company submitted feedback for this datapoint, the evidence was not considered material.

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Health and safety	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company's sustainability report states: 'A process has been established to identify occupational safety and health hazards, which includes the evaluation and prevention of occupational risks, in all the countries in which Iberdrola operates. The procedures established by standardised institutions are followed in each country, as well as those under the ISO 45001 standard. To manage this process, tools such as the following are used: Workplace risk assessment questionnaires; Regular risk assessments; Regular assessments identify the information needed for the annual review of the occupational health and safety management systems, and are used to develop action plans to mitigate risk; Safety inspections; Information sessions, regular training for employees identified as at risk, etc.; Internal and external audits to ensure the effectiveness of their processes; Expanded analysis of causes that affected other systems in order to apply the findings and prepare preventive and corrective actions to eliminate the causes of the event; Comprehensive assessment of low- and medium-potential incidents, investigation reports for incidents with high potential or major consequences. All with a view to determining corrective actions and lessons learned.' [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company reports on injured workers, with leave, without leave, days lost, injury rates and fatalities for the last three reporting years. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Expects disclosure of H&S information of relevant business relationships: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not disclose expectations for supply chain in relation to H&S information disclosure. • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities): Although the Company indicates that in its health and safety management system, there are targets and indicators, and states that its basic goals include achieving a 'gradual reduction in accident rates at the Iberdrola group's businesses', no evidence found of the actual targets related to injury rates, lost days or frequency rates and fatalities for the last reporting period. In its ESG Targets Update Presentation, the Company has established a target to reduce its 'accidentality rate' by 10% from the 2021 level by 2025 and by 21% by 2030. No evidence found, however, of targets related to fatal accidents. The Company indicates that 'Despite the strong progress made during the year in terms of health

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>& safety measures, including in well-being, the level of achievement is assessed at 82.603 % due to isolated and non-structural fatalities that were recorded during the year'. It is still not clear, what the actual targets are, and if not met, why it didn't, or how it works to improve on the matter. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [2024 Annual remuneration report, 2025: iberdrola.com]</p>
I.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The Company indicates that 'The Sustainable Development Committee possesses the following remits, among others, within the field of human rights: To oversee performance in sustainable development matters and, in particular, to ensure its practices in environmental and social matters are in line with the strategy and policies approved by the Board of Directors, and to report on it. To report to the Board of Directors information received on the measures and procedures adopted in the group in order to implement and monitor the provisions of the Policy on respect for Human Rights'. The provisions of human rights policy include requirements for suppliers. No evidence was found, however, on how experiences of affected stakeholders informed board discussions. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Human Rights Report 2022, N/A: iberdrola.com] • Not Met: Capacity building with suppliers: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Human rights report discloses calculations of risk exposure to forced labour in different contexts and identifies the situations where forced labour can take place. In the supply chain, it indicates that the percentage of purchases made in countries at risk of violation of the rights of [...] forced labor was 0%'. It also states that the '0,82% value associated to forced labor risk is related to the potential risk in the Xinjiang region in China [...] The company is working on different avenues to minimize this risk, including the possibility of carrying out audits and the study of component traceability mechanisms, as well as participating in the Solar Power Europe sector initiative'. However, it is not clear what is the actual work that is carried out on this matter. Scottish Power, a Company's subsidiary released a modern slavery statement due to its activities taking place in the UK. In the document the Company explains its recruitment processes and supplier screening, as well as its communication and awareness activities in its own operations, such as 'anti-slavery day and holding a week-long focus on Modern slavery through a variety of Company-wide communications to educate employees on the subject' It also refers to work conducted in the context of the 'Slave-Free Alliance' such as 'engagement with other members on best practice in tackling the issue of Modern Slavery and through bespoke training support for targeted employees. However, the evidence here seems to refer specifically to this subsidiary. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Human Rights Report 2022, N/A: iberdrola.com] & [Sustainability Report 2022, 24/02/2023: iberdrola.com] • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The Company indicates that 'Following the assessment of suppliers classified as potentially critical, those whose risk level is critical and which could cause an impact are identified. For this group of suppliers, corrective measures are taken in accordance with the Guide for conduct and sanctions for suppliers in the event of practices contrary to the Code of Ethics. In general and following the analysis of each case and the identification of the fundamental root cause, the measures to be taken by the supplier have been determined, establishing objectives and compliance deadlines [...] Finally, sanctions are imposed and, in some cases where sanctions do not have the desired effect, the contractual relationship is terminated with some of them'. However, it is not clear the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]
I.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts • Not Met: Describes work with suppliers on paying workers regularly, in full and on time

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Employer Pays Principle in policy for own ops and supply chain
I.4.PD	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations: The Company's Supplier Code states: 'Suppliers shall reject all forms of forced or compulsory labour and all forms of modern slavery and must adopt within their organisation appropriate measures to eliminate all such practices and promote the adoption of such measures within their supply chain.' However, this sub-indicator looks for evidence that the Company explicitly prohibits, and requires suppliers to prohibit retaining personal documents or restricting workers' freedom of movement. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Suppliers' Code of Ethics, 06/2024: iberdrola.com] • Not Met: Describes working with suppliers on free movement of workers: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: Description of implementation and monitoring of this practice
I.5.PD	Freedom of association and collective bargaining	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company's policy on Respect for human rights states that 'the Group also explicitly makes the following commitments: [...] to respect freedom of association and collective bargaining'. The Code of Ethics, in relation to labour practices of suppliers, requires the following: 'the freedom of association and the right to collective bargaining of the suppliers' professionals must be respected thereby, subject to the law and to the main international conventions applicable in each case'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'subject to the law applicable and to the main international conventions applicable in each case'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers' bodies where the right to freedom of association and collective bargaining is restricted under law. In addition to meet this requirement, evidence is required in relation to how it takes measures to ensure there is no retaliation in practice. During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however, the evidence was not material. [Policy on Respect for Human Rights, 19/12/2023: iberdrola.com] & [Code of Ethics, 20/06/2024: iberdrola.com] • Not Met: Describes work with suppliers on FoA/CB: The Human Rights Report discloses: 'In order to guide progress and support its suppliers towards a strategy of mutual improvement and learning, Iberdrola develops different initiatives, including: [...] Online awareness module on human rights, available on the corporate website and accessible to all suppliers. Support materials that allow the implementation of best practices in sustainability'. The supplier management report describes the "Sustainable Suppliers" training programme. However, it is not clear if these training and support materials cover freedom of association and collective bargaining. [Human Rights Report 2022, N/A: iberdrola.com] & [Procurement and Supplier management activity report 2023-2024, 06/2024: iberdrola.com] • Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company discloses the outcome of suppliers risk assessment in 2021, which is 'assessed in relation to the suppliers' purchasing volume in countries with potential risk'. The human rights report indicates that among goods and services suppliers, 0,82% of the purchases volume in relation to the risk of breaching the rights of freedom of association and collective bargaining'. This percentage is 0% in fuel supply chain. The Company reports that 76,5% of employees are covered by CB agreements. it discloses the percentages by country too. [Human Rights Report 2022, N/A: iberdrola.com] & [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Global Framework Agreement

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.6.PD	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Company indicates that 'according to Iberdrola's general principle of action and commitment to good employment standards, the company ensures a living wage above the minimum wage in its countries of operations'. No reference was found, however, in relation to the supply chain, as to whether there are requirements for suppliers to pay workers a living wage. In addition, it reports that 'The working conditions of the suppliers' professionals, which shall be communicated thereto in a language understandable to them, shall in any case respect the law, the collective bargaining agreement and the main international standards, as well as the international conventions applicable in each case, taking particular care to ensure appropriate terms regarding salaries, ordinary and overtime hours, and employee benefits.' However, the evidence presented does not indicate that the Company mandates its business partners to remunerate workers with a living wage. [Human Rights Report 2022, N/A: iberdrola.com] & [Code of Conduct for Suppliers, 25/03/2025: iberdrola.com] • Not Met: Describes work with suppliers on living wage: The Company indicates that 'In 2023, ScottishPower was pleased to be accredited as a Living Wage employer by Living Wage Scotland. The Real Living Wage is a voluntary UK wage rate which is set by the Living Wage Foundation each year to reflect the cost of living based on a basket of goods and services. This is higher than the UK Government's National Living wage. This also extends to our main contractors, requiring them to ensure they pay a Living Wage to workers acting for ScottishPower.' However, this sub-indicator seeks evidence of the Company's collaborative efforts to promote the payments of living wages by its suppliers. [2023 Modern Slavery Statement, 06/2024: web-content.scottishpower.co.uk] • Not Met: Description of process to determine living wages with unions: The Company indicates that 'Iberdrola's Governance and Sustainability System, as a general principle of conduct of its human resources management model, promotes respect for the human and labour rights recognised in domestic and international law, guaranteeing a stable job and a decent wage, promoting the physical, mental and emotional well-being of the workforce. To this end, the principles of employee remuneration policy provides for the payment of decent and fair salaries in cash, above the legal minimum wage established in each country, and an array of social benefits and entitlements adapted to the different social and labour realities of the territories in which the Group operates, and which are above the average for companies in each country in terms of pension, savings and health insurance benefits (see section S1-11). All employees are paid an appropriate salary above the benchmark, which corresponds to the legal minimum wage in the country concerned.' However, this sub-indicator seeks evidence of how the Company determine a living wage for the locations where it operates, which is periodically reviewed, including with relevant trade unions (or equivalent worker bodies where the rights to freedom of association and collective bargaining are restricted under law). [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com]

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Environmental impact assessment and remediation	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Conducts EIA for renewable energy projects: The Company indicates that 'Iberdrola has various systems for identifying impacts on the local communities surrounding its facilities and has developed the necessary measures to manage these impacts. The Environmental Impact Assessments (EIA), carried out in the planning phase prior to the construction of the facilities, include an assessment of social impacts in accordance with the applicable legislation in each country. In those countries with indigenous communities, a specific social impact study is also carried out for this group. Both assessments include an analysis of potential human rights impacts from an environmental and social perspective. To assess the potential impacts on the right to a safe, clean, healthy and sustainable environment, an assessment of the natural environment is carried out, including environmental impacts such as emissions, discharges, waste, fires, effects on biodiversity, changes in land use, changes in the aesthetics and quality of the landscape, restriction of access to water resources and forestry'. In the context of the Company explaining its Biodiversity action plans, it states that 'The Plan also reinforces the work done by the company to implement the mitigation hierarchy (avoid, reduce, mitigate, and compensate as a last option) in all project phases, from the design and Environmental Impact Assessment (EIA) processes to decommissioning after operation'. [Human Rights Report 2022, N/A: iberdrola.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Publishes EIA for renewable energy projects: Although the company submitted feedback for this datapoint, the evidence was not considered material. Main evidence refers to Scottish Power, including an example case. This subindicator looks for evidence of the Company generally publishing EIAs for projects. [ScottishPower website: Windfarms in development, N/A: scottishpowerrenewables.com] • Not Met: Explains when CIA is conducted
J.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments: The Company indicates that 'Iberdrola become in 2022 the first private company to be awarded the Sustainable Procurement Strategy Certificate by AENOR, based on the international standard ISO 20400:2017. Last November 2023, after successfully passing the first monitoring audit carried out in September, AENOR validated maintaining the certificate after verifying the implementation of the system with respect to the requirements specified in said reference. According to the standard, sustainable purchases are those "that have the greatest possible positive environmental, social and economic impact throughout the life cycle of the service or product". This certification defines how sustainability considerations should be integrated into existing procurement processes, promoting a procurement strategy that includes sustainability as a core value in decision-making'. However, no evidence found of an explicit requirement for suppliers to conduct LCA, and make these LCA public or regular. [Procurement and Supplier management activity report 2023-2024, 06/2024: iberdrola.com] • Not Met: Requires suppliers to have action plans to address adverse impacts identified: Although the company submitted feedback for this datapoint, the evidence was not considered material.

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Anti-corruption due diligence and reporting	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Commitment to prohibiting bribes to public officials: The Company's code of ethics states that 'Not offer or grant, or solicit or accept, whether directly or through an intermediary, unjustified advantages or benefits that are directly or indirectly intended to obtain a benefit, whether present or future, for the companies of the Iberdrola Group, for themselves or for a third party. In particular, they may not give or receive any type of bribe or commission from, or made by, any other party involved, such as government officials (whether Spanish or foreign) or personnel of other companies, political parties, authorities, customers, suppliers or shareholders. Acts of bribery, which are expressly prohibited, include the offer or promise, whether direct or indirect, of any kind of improper advantage, any instrument designed to conceal them, and influence-peddling.' [Code of Ethics, 20/06/2024: iberdrola.com] • Met: Expectation extends to relevant business relationships: The Scope of application of the code of ethics includes 'professionals and suppliers of the Companies of the Group'. It also indicates that 'the Code of Ethics sets forth the Company's commitment to the principles of business ethics and transparency in all areas of activity and establishes a set of principles and guidelines for conduct designed to ensure ethical and responsible behaviour by [...] suppliers of the Iberdrola Group's companies'. [Code of Ethics, 20/06/2024: iberdrola.com] • Met: Reports on any complaints on corruption and bribery: The Sustainability report discloses information regarding the existence of cases of corruption during the last financial year. It reports 2 cases. It also reports on 'proceedings from prior years with an impact on the financial year'. Also 'the group has confirmed 10 cases of corruption reported through the ethics mailboxes in 2023'. [Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com]
K.2.PD	Payments to governments & contract transparency	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Publishing a tax CbCR in line with GRI 207-4: The Company's 2023 Sustainability Report discloses 'data for the configuration of the country-by-country report' as 'the aggregation of data from the individual IFRS financial statements of the entities that make up the Iberdrola group's consolidation boundary (expressed in millions of euros), and not the consolidated financial statements, which was the method used until 2022. These figures exclude companies consolidated under the equity method.' [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Disclosure of payments for land purchase made to governments at project-level

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Company 'Diversity and Inclusion report' reports that 'to continue evolving along these lines [diversity and inclusion], we encourage the development of leaders in the area of diversity and inclusion, providing them with the knowledge and tools necessary to apply appropriate role models and drive inclusion within their teams as ambassadors'. It indicates that 'by 2022, more than 750 of our leaders participated in D&I trainings'. It then discloses the different actions that this framework includes. It also reports on awareness-raising campaigns and events in different group companies. The 2023 report indicates that 'In 2023, we delivered 33 thousand hours of D&I training (35% more than in 2022), which were received by 14,770 employees. We have over 350 D&I training resources available'. No evidence was found, however, that the Company provides mandatory annual training for all types of workers, as per ILO 190, equality, equity, diversity and anti-discrimination. [Diversity and inclusion Report 2022, 04/04/2023: iberdrola.com] & [2023 Diversity and Inclusion report, 2024: iberdrola.com] • Not Met: Requires suppliers to provide training: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: Provides materials and access to resources for trainings: Iberdrola, through its website, provides access to an 'online sensitivity-training module on human rights, which is accessible to all of providers'. However, this training does not specifically address equality, equity, diversity, anti-discrimination (including gender-based violence), or provide resources for trainers, which are the elements this sub-indicator is seeking. Although the company submitted feedback for this datapoint, the evidence was not considered material. [Online module: Human rights and your business, N/A: iberdrola.com] • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it: Although the company submitted feedback for this datapoint, the evidence was not considered material.
L.2.PD	Gender balance and sensitivity	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain • Not Met: Demonstrates progress through annual reporting: Although the Company publishes a Diversity and inclusion report, this subindicator requires evidence of progress towards the integration of gender lens into human rights policies, due diligence processes and risk management. Although the company submitted feedback for this datapoint, the evidence was not considered material. [2023 Diversity and Inclusion report, 2024: iberdrola.com] & [Diversity and inclusion Report 2022, 04/04/2023: iberdrola.com] • Not Met: Women and non-binary people make up at least 40% of the Company's executives: The Company's annual financial information report states: 'These commitments and activities are strengthened through the ESG goals published by the Company, which included obtaining external certification of equal gender pay by 2025, the presence of women in high-ranking positions (management positions), with a target of 30% by 2025 and 35% by 2030, and the presence of women in positions of responsibility (management positions, middle management and highly qualified technical positions), with a target of 35% by 2025 and 36% by 2030.' [Annual financial information Iberdrola, S.A. and subsidiaries, 23/02/2024: iberdrola.com] • Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company's annual financial information report states: 'At the Company level, Iberdrola's Board of Directors Diversity and Member Selection Policy and the selection of its members has allowed it to achieve a balanced presence of women and men, which is reflected in the 50/50 distribution of external directors between both genders and in no gender with a representation of less than 42.86% of the total number of directors.' [Annual financial information Iberdrola, S.A. and subsidiaries, 23/02/2024: iberdrola.com]
L.3.PD	Gender wage gap reporting	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Has closed gender wage gap or timebound commitment: The Company's annual financial information discloses: 'The absence of a pay gap between women and men is one of the SDG parameters used to determine the calculation of the remuneration from the 2020-2022 Strategic Bonus approved by the shareholders at the General Shareholders' Meeting held on 2 April 2020. The pay gap is defined as

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the difference between the average remuneration of women and men working at the companies of the group. And remuneration is considered to be the full-time equivalent annualised salary at 31 December 2020, 2021 and 2022, plus supplements and annual variable remuneration received during the corresponding year. The assessment of the performance of this parameter of the 2020-2022 Strategic Bonus determined a 100% compliance level, after finding a 5.5% positive gap in favour of women (Annual Director Remuneration Report 2022, p. 19).'</p> <p>[Annual financial information Iberdrola, S.A. and subsidiaries, 23/02/2024: iberdrola.com] & [Diversity and inclusion Report 2022, 04/04/2023: iberdrola.com]</p> <ul style="list-style-type: none"> • Met: Reports information at company level across multiple pay bands: The Company reports pay gap by age groups for the past three years. Pay groups include 'up to 30 years', 'between 31 and 50 years', 'over years'. It also indicates that 'In application of Requirement 6 of GRI 1, the company considers that the pay gap indicator segmented by professional category and country is not applicable, replacing it with an indicator segmented by age. The nature of the industry and the limited representation of women in technical careers for the last three decades mean that age explains the pay gap better than occupational category'. <p>[Sustainability Report 2022, 24/02/2023: iberdrola.com] & [Diversity and inclusion Report 2022, 04/04/2023: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations: The Company states that 'trade union negotiations are part of the labour relations management model at group companies, and collective bargaining agreements are established to reflect modern and advanced labour practices, while respecting the regional characteristics and areas of activity of the various group companies and seeking to go beyond compliance with legal requirements'. It also engages in social dialogue in the context of transition: 'In Spain, Iberdrola is part of the Agreement for a fair energy transition for thermal power plants in closure: employment, industry and territories, along with the Ministry for Ecological Transition, Ministry of Labour and Social Economy, other companies that own coal-fired thermal power plants in Spain, and trade union organisations. This agreement seeks to ensure that workers and territories make the most of the transition opportunities and minimise its negative impacts through support and recovery measures'. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified. • Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition. • Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.
JT.2	Fundamentals of just transition planning	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.: The Company's Sustainability Report states: 'In the area of strengthening multilateral dialogue for climate action, Iberdrola has provided support to the Club de Madrid's "Leadership for Net Zero" project, forming part of the working group on just transition in global supply chains.' The Company discloses that 'In 2023, the Club de Madrid worked on the "Leadership for NetZero" initiative which has resulted on the report "Leadership for Net-Zero" that was launched in April 2024. The initiative seeks to chart a course towards climate neutrality from political leaders forging new pathways for climate action to businesses embracing innovation and sustainability, and from civil society advocating for systemic change to citizens demanding accountability [...] In 2023, Iberdrola has been an active member and contributor to the Working Group on Business Leadership that provided the private sector perspective to the "Leadership for NetZero" report, focusing on climate neutrality towards a just transition in the global supply chains.'. However this sub-indicator seeks evidence that the Company demonstrates how it engages both in social dialogue -including with unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) - and more broadly with stakeholders, in the development of its just transition planning. No evidence was found on how the Company engages with unions or equivalent workers bodies. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] & [Alignment assessment with the Paris

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Agreement of key organizations in which Iberdrola participates, 2024: iberdrola.com</p> <ul style="list-style-type: none"> • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company indicates that it 'is committed to its professionals throughout their careers, and therefore, in those cases in which a career transition is necessary, we provide programmes to support this transition, to facilitate continued employability as well as career-end management. In Spain, Iberdrola implements training plans on a planned basis, both in terms of training and methodologies, anticipating new production and/or environmental needs (greater digitalisation, green jobs, etc.), which allows employees to have the knowledge to maintain excellent levels of internal employability [...] In supporting the energy transition and the green economy, Iberdrola is committed to an orderly, just and inclusive transition, promoting economic and industrial development, as well as universal access to cost-effective and competitive energy [...] Iberdrola thus becomes an economic and industrial driver, encouraging the creation of new business lines and industries of the future, contributing to the strength of the industrial fabric and to the creation of new jobs related to the green economy. Iberdrola is also aware that the transition toward a decarbonised model will entail structural changes with a considerable impact on certain regions, areas and groups. So that no one is left behind, Iberdrola applies the social dividend principle, and its commitment to its stakeholders and human rights, to ensure that this transition is orderly, just and inclusive. Iberdrola therefore deploys resources, tools and projects aimed at maximising the social and economic opportunities of climate action while managing potential impacts on communities. An active dialogue and stakeholder engagement are vital for ensuring respect for human rights, including labour rights'. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The Company indicates that 'Linked to our commitment to sustainability, training and quality employment, we make it easier to prepare for and access green jobs in the communities where we are located. In 2023, we reinforced our commitment to employability with the launch of Global Green Employment (GGE) - a platform for career guidance, training and access to green job opportunities. The platform already has more than 30 partners and has posted more than 1,400 vacancies. Looking for solutions to the training mismatch in Europe, we co-lead Reskilling for Employment (R4E) project of the European Round Table (ERT). This is a collaborative reskilling ecosystem involving companies, public bodies, trade unions, industry associations and training providers. Through specific initiatives for the unemployed, we promote training in the energy sector while supporting the local economy in the territories where we are present. To date, we have reached more than 1,000 people in Spain, enabling them to re-orientate themselves in the labour market'. [Iberdrola's Diversity and Inclusion Report 2023, 2024: iberdrola.com] • Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups: The Company's I&D report discloses: 'Created in 2017, this project [School for (female) electricians] offers free technical training for residents in the areas where we operate. Two of the classrooms are exclusively for women and, in the mixed classes, at least 35% of the places are guaranteed for women. To date, we have trained 844 women, 68% of whom have joined our staff [...]Neoenergia has publicly committed to reach 30% of women trained by the school and 9% of women in electrician positions by 2025. [Iberdrola's Diversity and Inclusion Report 2023, 2024: iberdrola.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.4.PD	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company indicates that 'Since 2021, the Company has been co-leading the Reskilling for Employment (R4E) project, a joint initiative with major European companies to reduce skills mismatches and increase employment opportunities in sectors related to the energy transition. To date, more than 1,000 people have been retrained to adapt their careers to sustainable jobs'. However, this sub-indicator seeks evidence of the Company's public commitment to re-skill and/or up-skill workers displaced by the low-carbon transition. [2024 Consolidated NFIS and Sustainability Reporting, 2025: iberdrola.com] • Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.: Economist Impact has undertaken a programme of research— supported by Iberdrola— exploring the global outlook for green skills and the labour market impacts stemming from the green transition.' [Green skills: driving the transition to a more sustainable future, 2024: iberdrola.com] • Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The Company's Sustainability Report states: 'at Iberdrola we consider reskilling to be the process by which our people can acquire new skills that increase their contribution of value to the organisation or provide them with professional repositioning within the energy transition process ("greenskills"). Specifically, we divide the greenskilling process into two main groups: internal and external. Some examples of internal initiatives include: DATIA programme in finance and treasury management: a project that promotes data centric management with the use of big data applied to financial reporting processes. Processes that previously took 40 hours to complete can now be completed in 30 minutes thanks to a data driven reconfiguration, giving professionals more time to focus on analysis and providing value to the business; Networking programme for new facility managers and development managers, in which, after the profiles are analysed and identified, more than 300 hours of training have been recorded to train this group and reposition their technical experience in a new activity; The creation of a new Iberdrola Campus headquarters in Ricobayo (Zamora, Spain), which will provide support for wind turbine maintenance training, and be the meeting point for training all new recruits at the Iberdrola Spain subsidiary, through the Iberdrola IN programme'. The Company's I&D report discloses: 'Created in 2017, this project [School for (female) electricians] offers free technical training for residents in the areas where we operate. Two of the classrooms are exclusively for women and, in the mixed classes, at least 35% of the places are guaranteed for women. To date, we have trained 844 women, 68% of whom have joined our staff [...].Neoenergia has publicly committed to reach 30% of women trained by the school and 9% of women in electrician positions by 2025. [Statement of Non-Financial Information Sustainability Report 2023, 23/02/2024: iberdrola.com] • Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups. : See above—school for (female) electricians. Also, the Sustainability Report discloses: 'The Iberdrola-UNICEF alliance has been in place for more than a year in Spain and internationally, fostering training and employability opportunities in sectors related to the green economy aimed at young people in situations of vulnerability. Therefore, in conjunction with public authorities, suppliers, NGOs and academia, training courses are being designed and implemented, offering professional internships and job opportunities, as well as driving the creation of green economy start-ups.' [Iberdrola's Diversity and Inclusion Report 2023, 2024: iberdrola.com]
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it doesn't refer to social protection. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection.: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it refers to principles, not steps followed to identify impacts. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.: During the engagement phase, the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company provided BHRRC with additional evidence regarding this sub-indicator, however, the evidence was not material.</p> <ul style="list-style-type: none"> • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.: During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however, the evidence was not material, not related to the impact of the low-carbon transition.
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.: The Company's website discloses: 'The Group's professionals responsible for the engagement with each association carry out the alignment analysis, taking into account the extent to which the positions and objectives pursued by these organisations and the activities they carry out are consistent with the aforementioned frameworks. Both the publicly available information on the associations and the knowledge acquired by Iberdrola through participation in their committees and/or working groups are analysed, considering elements such as the real support for the achievement of a net zero emissions target in 2050, the deployment of renewable technologies according to the pace necessary to achieve this emission reduction and the application of the just transition principles on this path. As a result of this assessment, the positioning of the organisations is classified as aligned with, neutral or nonaligned to that maintained by the company in this area, and serves as a basis for decision-making regarding Iberdrola's future participation therein [...] The result of the analysis conducted in 2023 shows that 72% of the organisations in which Iberdrola participates are aligned with the company's Statement of commitment to sustainable development, respect for and defence of Human Rights and the fight against climate change. The remaining cases (28%) correspond to organisations whose alignment has been classified as neutral. In these cases, in which there is not complete alignment of the organisations with Iberdrola's position, the company continuously evaluates the suitability of its participation therein in order to defend its thesis and, thus, its interests and those of its Stakeholders.' [Public Affairs (website), N/A: iberdrola.com] • Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.: See above. [Public Affairs (website), N/A: iberdrola.com] • Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.: In its feedback to the BHRRC the Company refers to evidence present in the first subindicator and states that 'There is no need for action plans because there is no misalignment in the assessment'. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection: Although the company submitted feedback for this datapoint, the evidence was not considered material.

3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> • Area: Exposure to high risk of forced labour • Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism".

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar supply chain is in Xinjiang"]</p>
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to full solar supply chain transparency: In Iberdrola's Sustainability Report 2023, the company states that "in 2023, through specific clauses in the contracts for certain supplies, the company has tightened the requirements on its suppliers to prevent forced labour. Furthermore, assisted by specialised consultants, Iberdrola has carried out various audits to gain a better understanding of the origin and traceability of the raw materials and components included in some supplies (solar panels), allowing it to define measures for preventing these risks." <p>In its 2022 Procurement and Supplier Management activity report, the Company states that "The company makes efforts to fully map its supply chain back to the raw material level. In many cases Iberdrola solar panel suppliers include a full supply chain mapping in their offers, although this does not happen in 100% of the cases. In this sense, a third-party has been hired to help us in better mapping our solar supply chain. In particular, traceability studies of modules up to the polysilicon level to three manufacturers are about to be mapped in 2023. This effort is additional and complements the Solar Stewardship Initiative in which we are also involved." The Company further indicates that "Purchases made in countries considered high risk are periodically analysed, according to the country-risk map in human rights prepared by an independent third party, which reflects the risks considering the operational context and the sector of activity, as recommended by the United Nations Global Compact. This map updated in 2022 covers the 23 countries where the group operates, as well as the 56 countries where it supplies". In addition, the company indicated to BHRRC that: "Notably, the Company's Procurement and Services Division stated as one of its goals for 2023 'the development of a new model to identify the origin of Tier-n suppliers in the supply chains of critical equipment and material suppliers and with potential social and sustainability risks.' This model should include independent verification and include the full supply chain." To meet the requirements of this indicator, the mapping of the company's solar supply chain will need to be publicly disclosed.</p> <p>The Company is further a member of the Solar Stewardship Initiative (SSI). The pledges of the SSI include the following: 'The initiative seeks to create mechanisms for transparency within the solar supply chain, ensuring integrity and accountability throughout the process'. However, this is not equivalent to a public commitment to disclose a mapping of the Company's full solar supply Chain. The initiative further has developed a Supply Chain transparency standard for its manufacturer members, which 'covers silicon and other photovoltaic semiconductor materials'. However, the standard does not cover all materials. [Business and Human Rights Resource Centre, 11/07/2023, Iberdrola's response: media.business-humanrights.org] [Solar Stewardship Initiative, December 2024, "Traceability Standard": solarstewardshipinitiative.org] [Procurement and Supplier Management activity report 2022-2023, 06/2023: iberdrola.com] & [2023 Sustainability Report: iberdrola.com]</p> <ul style="list-style-type: none"> • Not Met: Publication of verified full solar supply chains: In the reporting year 2023, the company shared that it had around 19,000 suppliers and placed purchase orders worth a total of €12.5 million. The company also provides a breakdown of the regions suppliers are domiciled in and the number of purchases billed to each region. While this regional breakdown forms the first steps towards supply chain mapping, it does not provide a full granular mapping that has been verified by a third party. [2024 Factbook: iberdrola.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Steps taken aligned with UNGPs: In the company's response to the BHRRC in 2023, it states that 'Even though Iberdrola has had no knowledge of a demonstrated forced labour case related to its solar panel supply chain, since 2021, the Company has increased its due diligence in human rights, in general terms and, in particular, regarding those suppliers directly or indirectly linked to XinJiang region'. The Company indicates it is working on supply chain diversification. It states that 'Given the current market situation and in order to increase supply chain resilience and minimize risks, including forced labour and modern slavery, Iberdrola is working actively to increase local production capacity and is involved in 2 new manufacturing facilities in Spain'. The Company further states that 'Iberdrola has established a permanent working group to specifically monitor developments and efforts in relation to forced labour related to the solar equipment supply chain.' However, no evidence of verified full disengagement was found and the company's response did not meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) at the time this research is conducted. <p>The Company provided further comments to the BHRRC, outlining ESG audits and supply monitoring. However, the evidence was not material for this indicator. [Business and Human Rights Resource Centre, 11/07/2023, Iberdrola's response: media.business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Information relevant to all destination markets: The Company provided further comments to the BHRRC, outlining ESG audits and supply monitoring. However, the evidence was not material for this indicator.

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

4. Low-Carbon Transition Assessment (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
n/a	Emissions targets	87.5%	<ol style="list-style-type: none"> 1. Has the Company set and disclosed a Scope 1+2 short term target? Yes. 'Near-Term Targets Iberdrola SA commits to reduce absolute scope 1, 2 and 3 GHG emissions 65% by 2030 from a 2020 base year.' [Source: https://sciencebasedtargets.org/target-dashboard, 'Iberdrola'] 2. Has the Company set and disclosed a Scope 1+2 long term target set? Yes. 'Long-Term Targets Iberdrola commits to reduce scope 1, 2 and 3 emissions 90% by 2039 from a 2020 base year.' [Source: https://sciencebasedtargets.org/target-dashboard, 'Iberdrola'] 3. Is the Scope 1+2 short term target aligned with a net zero emissions scenario? Yes. 'Near-Term Targets Iberdrola SA commits to reduce absolute scope 1, 2 and 3 GHG emissions 65% by 2030 from a 2020 base year.' The Company further specified that 'The 65% absolute emissions reduction target by 2030 corresponds to scopes 1, 2 and 3 together. If we separate the target for scopes 1 and 2, the reduction would be 77%.' [Source : https://sciencebasedtargets.org/target-dashboard, 'Iberdrola'] 4. Is the Scope 1+2 long term target aligned with a net zero emissions scenario? Without evidence. 5. Has the Company set and disclosed a Scope 3 short term target? Yes. Iberdrola SA further commits to reduce absolute scope 3 GHG emissions from use of sold products 42% within the same timeframe. [Source: https://sciencebasedtargets.org/target-dashboard, 'Iberdrola'] 6. Has the Company set and disclosed a Scope 3 long term target?

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Yes. 'Iberdrola SA further commits to reduce absolute scope 3 GHG emissions from use of sold products 42% within the same timeframe.' [Source: https://sciencebasedtargets.org/target-dashboard, 'Iberdrola']</p> <p>7. Is the Scope 3 short term target aligned with a net zero emissions scenario? Yes 'Near-Term Targets Iberdrola SA commits to reduce absolute scope 1, 2 and 3 GHG emissions 65% by 2030 from a 2020 base year.' The Company has further specified that 'the near-term target for Iberdrola's Scope 3 in absolute emissions would be 62%.' [Source: https://sciencebasedtargets.org/target-dashboard, 'Iberdrola']</p> <p>8. Is the Scope 3 long term target aligned with a net zero emissions scenario? Yes. 'Iberdrola SA further commits to reduce absolute scope 3 GHG emissions from use of sold products 90% within the same timeframe.' [timeframe is by 2039, from 2020 – base year] [Source: https://sciencebasedtargets.org/target-dashboard, 'Iberdrola']</p>
n/a	Share of Low Carbon CAPEX	89%	<p>Low Carbon CAPEX: CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1) 10,631,086.</p> <p>Total CAPEX: 11,945,619.</p> <p>Source: Sustainability report, 2024. https://www.iberdrola.com/shareholders-investors/operational-financial-information/annual-reports p. 207</p>
<u>Final score</u>		88%	

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

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* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

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