



# Iberdrola Group Companies Compliance systems Transparency Report 2024

April 2025





## Iberdrola, S.A.

Report on procedures agreed regarding the report on the transparency of  
Compliance Systems of the Iberdrola Group companies in 2024

### **NOTICE**

This document is a translation of a duly approved Spanish-language document, and is provided for informational purposes only. In the event of any discrepancy between the text of this translation and the text of the original Spanish-language document that this translation is intended to reflect, the text of the original Spanish-language document shall prevail.



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*(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)*

## **Agreed-upon procedures report on the Iberdrola Group Companies Compliance systems Transparency Report 2024**

To the Compliance Unit of Iberdrola, S.A.

### **Purpose of this agreed-upon procedures report and restrictions on its use and distribution**

Our agreed-upon procedures report on certain indicators contained in the Iberdrola Group Companies Compliance system Transparency Report 2024 (hereinafter, the Transparency Report), detailed in part 3 of the Procedures and *findings* section of this report, is issued solely to assist the Compliance Unit of Iberdrola, S.A. (hereinafter the Company) in its evaluation of certain information included in the Transparency Report prior to its publication on the Company's website, and may not be suitable for any other purpose. Accordingly, it may not be used for any other purpose without our prior written consent.

Our maximum liability to Iberdrola, S.A. for damage and loss arising from misconduct or negligence on our part in the provision of these services is that specified in our engagement letter dated 3 April 2025. In no circumstances shall we accept any liability to parties other than the addressees of this report that may obtain access to it.

### **Responsibility of the engaging party**

The Company's Compliance Unit has confirmed that the agreed-upon procedures are suitable for the purpose of the engagement. The Company's Compliance Unit is likewise responsible for preparing the Transparency Report on which the agreed-upon procedures are applied.

The addressees of the report are responsible for ensuring that the procedures performed are sufficient to meet the objectives pursued.

### **Auditor's responsibility**

Our engagement was undertaken in accordance with generally accepted professional standards in Spain applicable to agreed-upon procedures engagements based on ISRS 4400 (Revised), which regulates the auditor's work in this type of engagement. In an agreed-upon procedures engagement, the users of the report should draw their own conclusions from the factual findings reported as a result of performing the specific procedures defined by you for the aforementioned purpose. We do not accept any liability for the sufficiency of the procedures performed.



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Because the above procedures do not constitute either an audit, a review or an assurance engagement, we do not express an opinion or conclusion on the information contained in the Transparency Report, taken as a whole. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

#### *Professional ethics and quality management*

We have complied with the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA). For the purpose of this engagement, we are not bound by any independence requirements.

Our firm applies the International Standard on Quality Management 1 (ISQM1), "*Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*," which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

## **Procedures and findings**

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The procedures applied and findings obtained were as follows:

- 1- Procurement from management of the Company's Compliance Unit of the "Iberdrola Group Companies Compliance systems Transparency Report 2024" prepared by the Compliance Unit. This document accompanies our report.
- 2- Procurement from management of the Company's Compliance Unit of the reports extracted from the Iberdrola Group companies' information systems relative to the indicators detailed in procedure 3 and corroboration of the information contained in these reports with that contained in the Transparency Report for the corresponding indicators.



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3- For each of the indicators contained in the accompanying Transparency Report and detailed below, performance of the procedures specified in the “Procedures performed” column of the following table:

Indicator	Section/Page of the Transparency Report	Procedures performed
1. Number of compliance directors’ appearances before their respective governing bodies in 2024	2.1 Composition and duties of the Compliance Unit of Iberdrola, S.A and the other compliance units of the Group's companies (page 16)	1- Procurement from management of the Company's Compliance Unit of a list of compliance directors’ appearances before their respective governing bodies in 2024. 2- Procurement of the minutes of 5 randomly selected appearances in 2024. 3- Corroboration that the minutes obtained in the preceding step contain express details of all the directors’ appearances contained in the list obtained in point 1 above.
2. Amount budgeted for the Compliance Unit	2.2 Budget and resources (page 18)	1- Procurement from management of the Company's Compliance Unit of the budget for Compliance functions in 2024 approved by approved by their respective governing bodies of Iberdrola, S.A. and subsidiaries. 2- Procurement of the Control Management Report detailing the amount budgeted for the Compliance functions of Iberdrola, S.A. and subsidiaries and monitoring of actual vs. budgeted expense. 3- Corroboration that the budget approved for the Compliance functions of Iberdrola, S.A. and subsidiaries for 2024 matches that reflected in the Control



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		Management Report and in the Transparency Report.
3. Number of employees	2.2 Budget and resources (page 18)	<p>1- Procurement from management of the Company's Compliance Unit of a list of Group companies' employees working solely for Compliance function of Iberdrola, S.A. and subsidiaries at 31 December 2024.</p> <p>2- For a sample of 5 employees selected randomly from the list in point 1 above, corroboration of their assignment to the Compliance function in the Iberdrola S.A. and subsidiaries internal directory.</p>
4. Evidence of how controls work	3 Compliance risk analysis and assessment (page 20)	<p>1- Procurement from management of the Company's Compliance Unit of a list of controls identified in 2024 by the Compliance functions of Iberdrola, S.A. and subsidiaries to cover the different risks.</p> <p>2- For a sample of 5 controls selected randomly from the list in point 1 above, procurement of documentation supporting evidence of the design and execution of the control.</p>
5. Third party evaluations	5.1 Assessment of third - parties (page 27)	<p>1- Procurement from management of the Company's Compliance Unit of a list of the evaluations made of third parties (Iberdrola S.A. and subsidiaries suppliers and debtors in 2024).</p> <p>2- For a sample of 5 evaluations selected randomly from the list in point 1 above, procurement of documentation supporting the evaluations made.</p>



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<p>6. Transactions supervised by nature</p>	<p>5.1 Assessment of third - parties (page 27)</p>	<p>1- Procurement from management of the Company's Compliance Unit of a list of transactions of Iberdrola S.A. and subsidiaries supervised by the Compliance functions in 2024 classified by nature of the risk.</p> <p>2- For a sample of 5 transaction selected randomly from the list in point 1 above, procurement of documentation supporting the supervision carried out.</p>
<p>7. Robust principal supplier compliance system</p>	<p>5.2 Sustainability - Development of suppliers (page 28)</p>	<p>1- Procurement from management of the Company's Compliance Unit of the criteria followed by the Iberdrola S.A. and subsidiaries Compliance functions in 2024 for classifying the supplier compliance system.</p> <p>2- Procurement from management of the Company's Compliance Unit of a list of principal suppliers together with the compliance evaluation carried out.</p> <p>3- For a sample of 5 suppliers selected randomly from the list in point 1 above, procurement of documentation supporting the compliance evaluation of compliance carried.</p>
<p>8. Background checks of the management team</p>	<p>5.4 Professionals (page 30)</p>	<p>1- Procurement from management of the Company's Compliance Unit of a list of background checks of Iberdrola, S.A. and subsidiaries made in 2024.</p> <p>2- For a sample of 5 background checks selected randomly from the list in point 1 above, procurement of documentation</p>



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		supporting the evaluation carried out.
9. Conflicts of interest	5.4 Professionals (page 30)	<p>1- Procurement from management of the Company's Compliance Unit of a list of conflicts of interest of Iberdrola, S.A. and subsidiaries communicated to the Compliance functions of Iberdrola, S.A. and subsidiaries in 2024.</p> <p>2- For a sample of 5 communications selected randomly from the list in point 1 above, procurement of documentation supporting communications received.</p>
10. Gifts and hospitality	5.4 Professionals (page 30)	<p>1- Procurement from management of the Company's Compliance Unit of a list of gifts and hospitality communicated in 2024.</p> <p>2- For a sample of 5 communications selected randomly from the list in point 1 above, procurement of documentation supporting evidence of the communications made.</p>
11. Training given by the Compliance Unit	8.1 Training (page 40)	<p>1- Procurement from management of the Company's Compliance Unit of a list of training sessions given by the Compliance functions of Iberdrola, S.A. and subsidiaries in 2024.</p> <p>2- Procurement from management of the Company's Compliance Unit of a list of employees trained and number of hours' training received in total training sessions given by the Compliance functions of</p>



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		<p>Iberdrola, S.A. and subsidiaries, and in particular, those relative to anti-corruption.</p> <p>3- For a sample of 5 training sessions selected randomly from the list in point 1 above, procurement of documentation supporting the number of attendees and the number of hours' training.</p>
12. Communication	8.2 Communication (page 41)	<p>1- Procurement from management of the Company's Compliance Unit of a list of internal and external compliance communication activities carried out in 2024.</p> <p>2- For a sample of 5 communication activities selected randomly from the list in point 1 above, procurement of documentation supporting the communications made.</p>
13. Ethics mailbox	9 Internal reporting system (page 46)	<p>1- Procurement from management of the Company's Compliance Unit of a list of communications received by the ethics mailbox in 2024 (complaints and consultations) indicating for each one whether it was admitted and the disciplinary measures adopted.</p> <p>2- For a sample of 5 communications selected randomly from the list in point 1 above, procurement of documentation supporting the communication received, whether it was admitted and any disciplinary measures adopted, if applicable.</p>
14. Dissemination and promotion of business ethics	12 Dissemination and promotion	<p>1- Procurement from management of the Company's Compliance Unit of</p>



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	of business ethics (page 55)	a list of the business ethics dissemination and promotion initiatives carried out in 2024. 2- For a sample of 3 communications selected randomly from the list in point 1 above, procurement of documentation supporting evidence that the initiative was carried out and the related cost.
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- 4- Procurement of the Compliance Unit's secretary certification approving the Transparency Report.
- 5- Procurement of a representation letter signed by the director of the Company's Compliance Unit.

We have not detected any exceptions as a result of performing the aforementioned agreed-upon procedures.

KPMG Auditores, S.L.

*(Signed on original in Spanish)*

Igor Zugaza Santamaría

30 April 2025



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# 01. Introduction



Iberdrola, S.A. (the “**Company**”) aims to ensure that its conduct and that of the people associated with it, in addition to the legislation in force and its Governance and sustainability system, complies and conforms to generally accepted ethical and sustainable development principles.

In this regard, the Company promotes a preventive culture based on the principle of “zero tolerance” towards the commission of illegal acts and all forms of fraud and corruption.

The Company’s Board of Directors (the “**Board of Directors**”) has approved the Purpose and Values of the Iberdrola Group, which sets out the *raison d’être* and the ideological and axiological basis of the business project of the companies belonging to the Iberdrola group (the “**Group**” or the “**Iberdrola Group**”) and presides over its daily activity. The content of the Purpose and Values of the Iberdrola Group develops and takes shape in the Company’s Code of ethics, which is intended to serve as a guide for the actions of the directors, professionals and suppliers of the Group’s companies.

For purposes of clarification, whenever “Iberdrola, S.A.” or the “Company” is mentioned in this report, reference is made to this company individually, whereas when references are made to the “Group” or the “Iberdrola Group”, they include the Company and the companies in which it has a majority interest, directly or indirectly. The Iberdrola Group does not have its own legal personality distinct from that of each of the aforementioned companies, nor does it therefore have its own specific management bodies or offices.

In addition to the Purpose and Values of the Iberdrola Group and the Code of ethics, the Board of Directors exercising its responsibility of devising the Company’s strategy and approving its corporate policies, has approved the Compliance and the internal reporting and whistleblower protection system policy and the Anti-corruption and anti-fraud policy.

Within this context, in order to give effect to the ethical standards and principles established in its Governance and sustainability system, Iberdrola and the companies of the Iberdrola Group have established compliance systems that include all regulations, formal procedures, and material actions intended to ensure the conduct of each company in accordance with ethical principles, the law, and internal regulations, in particular, the Governance and sustainability system, to contribute to the full realisation of the Purpose and Values of the Iberdrola Group and of the corporate interest, as well as to prevent, manage and mitigate the risk of breaches of regulations and ethics that may be committed by the directors, professionals or suppliers thereof within the organisation (the “**Compliance system**”).

**Iberdrola promotes a preventive culture based on the principle of “zero tolerance” towards all forms of fraud and corruption**

The different bodies and divisions directly entrusted with implementation, development and supervision are also part of the compliance systems. The fundamental elements of the compliance systems of the companies that are part of the Iberdrola Group are, on the one hand, the crime prevention programmes and, on the other hand, each company’s internal reporting system, which includes their respective whistleblowing channels for reporting possible irregular conduct or potential unlawful acts or acts contrary to the law or to the Governance and sustainability system.



In order to proactively ensure the effective operation of the Company's Compliance system, in 2012 the Board of Directors of Iberdrola, S.A. created the Company's Compliance Unit (the "**Unit**"), a collegiate body of an internal and permanent nature, configured in accordance with the highest standards of independence and transparency linked to its Sustainable Development Committee (the "**Sustainable Development Committee**"), in accordance with the provisions of its Governance and sustainability system, for which it is vested with extensive powers, budgetary autonomy and independence of action.

Similarly, in 2023, the boards of directors of the subholding companies and head of business companies of the Group set up their own compliance units responsible, in particular, for proactively and autonomously overseeing the sufficiency, the implementation and the effectiveness of the compliance system for their respective company. Notwithstanding the prior existence of the corresponding compliance division in each of these companies.

Pursuant to the provisions of Iberdrola's Governance and sustainability system, these compliance units are linked to a consultative committee of their board with specific compliance-related duties, if established, or to its board of directors if it does not have one. The functions of these aforementioned compliance units include fostering a culture of ethical behaviour and 'zero tolerance' towards irregular actions and the commission of unlawful acts or acts contrary to the law or to the Governance and sustainability system, as well as monitoring the application and effectiveness of the compliance systems of its companies in a proactive and autonomous manner, without prejudice to the appropriate coordination carried out at Group level.

The Unit conducts its functions in connection with the Company's Compliance system and coordinates those carried out autonomously by the compliance units of each of the companies in the Group.

This report, approved by the Unit on 22 April 2025, includes the main actions, initiatives and measures developed, promoted and adopted by the different compliance units during 2024, which illustrate the functioning of the compliance systems of the Group's companies and highlight their effectiveness.

**The Compliance Unit of Iberdrola, S.A. is linked to the Sustainable Development Committee**



# 02.

## The compliance units of the Group's companies



## 2.1 Composition and duties of the Compliance Unit of Iberdrola, S.A. and the other compliance units of the Group's companies

The Compliance Unit of Iberdrola, S.A., is a collegiate body of an internal and permanent nature, linked to the Sustainable Development Committee, and has been assigned powers related to the Code of ethics, the effectiveness of the Compliance system and with the internal reporting system and whistleblower protection, with respect to the crime prevention, the securities market, and the separation of activities, as well as all those that may be assigned thereto by the Sustainable Development Committee or the Board of Directors or that are attributed thereto by applicable law and the internal regulations of the Company, in particular, Iberdrola's Governance and sustainability system.

The composition, powers and functioning of the Unit are regulated in the Compliance Unit Regulations. Its members are appointed by the Board of Directors, at the proposal of the Sustainable Development Committee, following a report from the Company's Appointments Committee, and hold the following positions:

- The chairman of the Unit, a position held by a professional external to the Group companies, who is an expert of recognised prestige in compliance.
- The members of the Unit, one of whom is the Compliance officer of the Company (the "**Compliance officer**"). Other members may include, but are not limited to, those responsible for different areas or functions related to compliance risk management.
- The secretary of the Unit (non-member), who is a professional external to the Group's companies.

The Compliance officer is in charge of the operation of the Unit and its budget and is responsible for executing the actions included in the Annual activities plan and all those that are necessary for the Unit to proactively and autonomously perform its functions, regularly reporting to it on the performance of the aforementioned actions, and carries out the other functions attributed to it in the regulations, and in particular, in the Governance and sustainability system.

During 2024, the Compliance Unit of Iberdrola, S.A. has held eleven meetings.

The Unit, represented by its Compliance officer, appears and reports regularly to the Sustainable Development Committee to report on activities, actions and incidents related to the compliance function. In 2024, the Compliance officer reported 2 times to the Sustainable Development Committee and 2 times to the Company's Audit and Risk Supervision Committee.

**The Compliance Unit of Iberdrola, S.A., represented by its Compliance officer, appears and reports regularly to the Sustainable Development Committee**



For their part, in 2023, the boards of directors of the subholding and head of business companies set up their respective companies' compliance units configured as independent and autonomous internal areas, linked to their respective governing bodies, responsible for proactively and autonomously overseeing the sufficiency, the implementation and the effectiveness of their respective company's compliance system, which includes, among other regulations and procedures, the crime prevention programme. The members of the above-mentioned units are also appointed by their respective boards of directors, upon proposal, if any, of the corresponding audit and compliance committee, in accordance with the following composition:

- The chairman, external professional of recognised prestige in compliance matters.
- The members of the Unit, one of whom is the Compliance officer of the company concerned. Other members may include, but are not limited to, those responsible for different areas or functions related to compliance risk management.
- The secretary (non-member), professional of the Legal Services area of the company concerned.

**Budgetary  
autonomy and  
independence of  
action**

The units also report periodically to their governing bodies or their audit and compliance committees, as appropriate, on the most relevant aspects of the activities conducted by the compliance function during the year. The removal and appointment of the members of the units corresponds to the governing bodies of the subholding companies and the head of business companies, following a report from the audit and compliance committee, if applicable.

The units of the subholding companies relate to the Unit in accordance with the General coordination, collaboration and information protocol which, approved by the Unit in accordance with the provisions of the Governance and sustainability system, regulates the relations between them. Notwithstanding their management autonomy, the units shall endeavour to coordinate their actions and to comply with the general guidelines issued by the Unit in order to ensure the effectiveness of the compliance systems of the Group companies.

In 2024, 35 coordination meetings were held between the members of the compliance function of Iberdrola, S.A. and those of other Group's companies.

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**131 appearances**  
of compliance officers before their respective  
governance bodies in 2024

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## 2.2 Budget and resources

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12 million euros  
in the Group's budget

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Both Iberdrola, S.A.'s Compliance Unit Regulations and the regulations of the different compliance units establish that the compliance function will have the necessary material and human resources to perform their functions. Thus, on an annual basis, the governing bodies of each company approve the budget of their respective compliance units, giving them the necessary autonomy and independence for the exercise of their functions.

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61 professionals  
in the Group's companies exclusively dedicated  
to compliance duties

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## 2.3 Professional qualifications

The members of the compliance units, their chairpersons, their compliance officer and other professionals who work in the compliance function in each of the Group's companies have proven knowledge, experience and skills to perform their duties.

The main certifications in terms of compliance that have been obtained by professionals in the compliance function are as follows:

- Certified Compliance & Ethics Professional (CCEP), issued by the Compliance Certification Board (CCB) of the Society of Corporate Compliance and Ethics (SCCE).
- Leadership Professional in Ethics and Compliance (LPEC), issued by the Ethics and Compliance Initiative (ECI).



- Certified Fraud Examiner (CFE) issued by the Association of Certified Fraud Examiners (ACFE).
- Certificate of Compliance (CESCOM), issued by the Spanish Compliance Association (ASCOM).
- International Compliance Officer Certificate (CICO), issued by the Institute of Compliance Officials (IOC).

The training and update of knowledge of compliance professionals is an essential element of the Compliance systems. Accordingly, during 2024, compliance professionals in the Group companies spent a total of 2,002 hours on various ethics and compliance training activities.

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An average of 33 hours  
of training received by the professionals  
of the compliance function

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## 2.4 Professional profile

The compliance units, aware that the development and maintenance of an effective compliance system requires different professional profiles, ensures that the people who make up the compliance teams have training in different complementary areas. In fact, the academic background of Compliance professionals extends to a wide range of areas:

- Business Management and Administration
- Data analytics
- Law
- Engineering
- Technology
- People management



# 03.

## Compliance risk analysis and assessment



The compliance units, within their respective companies, periodically update the compliance risk map, following the guidelines set out in the Guide for the assessment of compliance risks approved by the Unit. This assessment includes the evaluation of the likelihood of the materialisation of each of the risks and the impact that such materialisation would have.

These risk maps are drawn up on the basis of a homogeneous risk inventory for the Group's perimeter and using a common methodology. The risks to be assessed are shown in the table below:

Risks
Harassment
Money laundering and terrorism funding
Supply chain
Cybercrime
Competition
Conduct in the securities market
Smuggling
Corruption and fraud
Workers' rights
Discrimination
Embezzlement
Falsification of public information
Fraud against public administrations and social security
Criminal insolvency
Hindering external oversight
Permits, licences and authorisations
Health & Safety
Intellectual and industrial property
Consumer protection
Data protection
International sanctions
Trade secrets
Facility safety, environment and public health



Each compliance unit analyses the possible existence of such risks in each of the corporate areas and businesses of its respective company. In the risk assessment process, the managing team responsible for said areas and businesses is involved.

The information obtained is used to draw up the compliance risk map for each entity, which is updated periodically, identifying the main controls in place within the Group's perimeter to mitigate them and proposing, where appropriate, improvement actions to reinforce the effectiveness of these controls.

In 2024, the total number of controls executed in the Group companies amounts to 1,903 and 4,184 pieces of evidence have been generated regarding its correct functioning. This process has involved 943 professionals in key positions responsible for attesting the correct functioning of controls.

The risk maps of each company are regularly updated by their respective compliance units.

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4,184 pieces  
of evidence of the correct functioning  
of the Group's controls

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# 04. Regulations



The Group companies' compliance systems are structured on the basis of: (i) certain regulations approved by the Board of Directors of Iberdrola, S.A., and which form an integral part of the Governance and sustainability system; (ii) the certain regulations approved by its own governing bodies, and (iii) the complementary regulations approved that each compliance unit develops and approves by virtue of the powers granted by their respective Regulations.

Regulations approved by the Board of Directors <sup>1</sup>	Regulations approved by the compliance units
Code of ethics	General coordination, collaboration and information protocol
Compliance and internal reporting and whistleblower protection system policy	Protocol for corporate transactions
Anti-corruption and anti-fraud policy	Sponsorship, donations and social contributions protocol
Internal Regulations for Conduct in the Securities Markets	Protocol for the management of third-party fraud and corruption risk
Internal rules for the processing of inside information	Protocol for fair competition
Procedure for related party transactions with members of senior management, delegated related party transactions and transaction lines	Protocol for the business relationship with the Public Administration
Regulations of the Compliance Unit	Protocol for internal investigations and management of the internal information system
	Protocol for gifts and hospitalities
	Protocol for action in the event of notification of judicial and administrative penalty proceedings
	Guide for the assessment of compliance risks
	Guide for the assessment of third-party risks and due diligence procedures
	Guide for background check procedure prior to undertaking managing duties

1. The regulations approved by the Board of Directors (except for the Procedure for related party transactions with members of senior management, delegated related party transactions and related party transaction lines ) are available at [www.iberdrola.com](http://www.iberdrola.com).



In addition to the above-mentioned regulations, another 628 procedures approved by the different Group companies and internal regulations specific to the different areas and businesses of the companies that make up the Group also help to effectively prevent crimes and other irregular conduct from being committed. These regulations are regularly updated and monitored by the compliance units to assess their preventive potential.



# 05. Risk management



## 5.1 Assessment of third-parties

Pursuant to the provisions of the Protocol for the management of the third-party fraud and corruption risk, suppliers and debtors of the Group companies are assessed on fraud and corruption.

This analysis is conducted before the supplier can be invited to any contracting process.

The risk assessment of the third party considers, among other matters:

- Links with countries considered by the compliance function as higher-than-normal risk.
- International sanctions.
- Adverse news or incidents related to:
  - Human rights.
  - Modern slavery and child labour.
  - Corruption and bribery.
  - Anti competitive practices.
  - Other irregularities and unlawful conduct.
- Links with persons with public responsibility or state-owned entities.

Based on this analysis, the compliance function rates the fraud and corruption risk of suppliers and debtors and records this rating in the corporate systems. If the risk is considered higher than normal, the compliance function will monitor all transactions intended to be entered into with that third party.

Suppliers and debtors considered to present a critical risk are blocked in the systems, which prevents the formalisation of any transaction or payment in relation to them.

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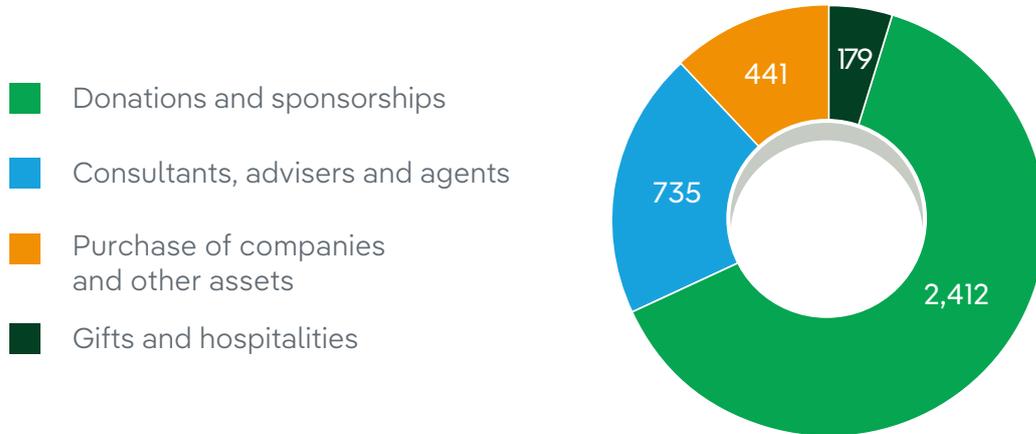
5,817 third party  
assessments carried out in 2024

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After the initial screening upon registration, the Group's suppliers and debtors are monitored on a daily basis through the fraud and corruption databases (ongoing screening). The relevant compliance function is automatically alerted as soon as there is a new development concerning one of the Group's suppliers and debtors and immediately analyses it in order to update the risk assessment of that supplier or debtor.



## NUMBER OF TRANSACTIONS SUPERVISED BY COMPLIANCE (CLASSIFIED BY NATURE)



The contracts entered into by the Group's companies include specific clauses on ethics and anti-corruption and anti-fraud provisions that bind the third party to business ethics and integrity and the principles set forth in the Code of ethics and in the Anti-corruption and anti-fraud policy.

## 5.2 Sustainability - Development of suppliers

The compliance function of each company, in line with the Group's strategic goals on sustainability, encourages the development of compliance systems in the third parties with which it interacts.

In coordination with the Procurement Division, the compliance function maintains regular contact with their respective strategic suppliers to promote the implementation in their organisations of effective compliance systems aligned with the principles set out in their Governance and sustainability system.

The impact of these actions is monitored through the evolution of the supplier's score in the supplier assessment model developed by the Purchasing Division according to sustainability criteria.

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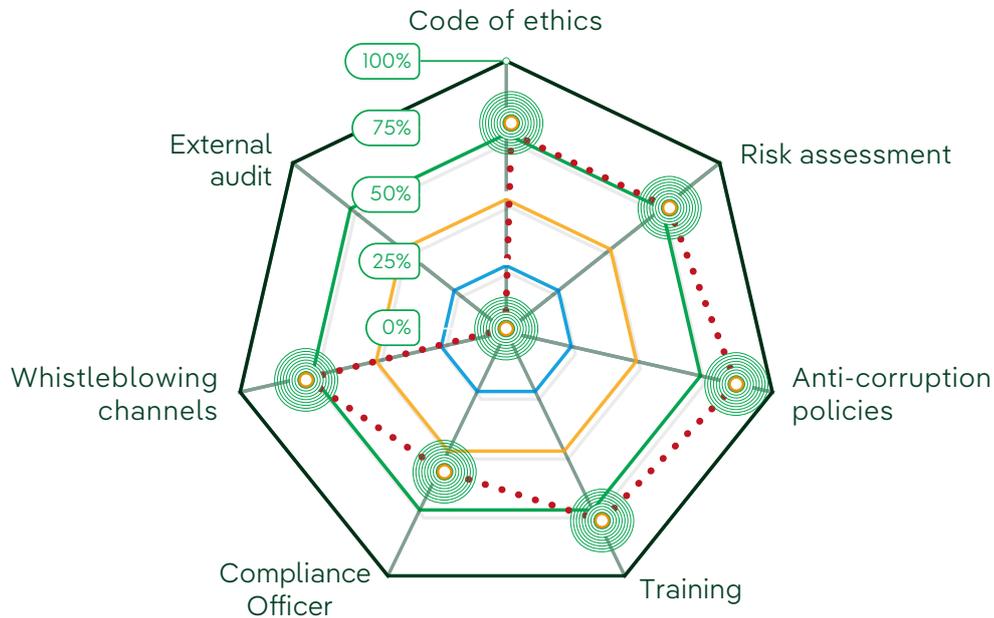
2,088 main suppliers  
have a robust compliance system<sup>2</sup>

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2. A score of 7 out of 10 or more in the ethics and compliance section of the supplier assessment model.



## PRESENCE OF ELEMENTS OF A COMPLIANCE SYSTEM AT THE GROUP SUPPLIERS<sup>3</sup>



The compliance function is proactively requesting the key suppliers of the Group's companies to have their ethics and compliance systems audited by an independent third party. In this regard, in 2024, Iberdrola has helped 19 key suppliers in the development of their respective compliance systems. This help includes specific meetings to know key elements of their compliance system, the assessment of documentation and the establishment of an agreed road map to improve their compliance system. The purpose of these sessions is to reinforce the supplier's compliance system so it can be subject to an external audit in accordance with the best practices in the matter.

## 5.3 Strategic projects

The Investment policy approved by the Company's Board of Directors, establishes the need to involve the compliance function in strategic decisions, establishing the need for an analysis of the possible risk of fraud and corruption associated with each investment or divestment project prior to its approval. During 2024, the compliance function assessed a total of 55 projects.

3. Information on the 4,227 suppliers of the Group's companies with the highest turnover.



## 5.4 Professionals

### *Background checks*

The compliance units conduct prior checks on the persons who assume management functions in their respective companies, by analysing publicly available information, in order to ensure their suitability from a compliance perspective (background checks).

In 2024, the compliance function has conducted 451 background checks on members of the management teams of the Group's companies. As a result of these assessments, 1 candidate was rejected.

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451 *background checks*  
to the management team

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### *Conflicts of interest*

In accordance with the provisions of the Code of ethics, Group professionals are obliged to report in writing any conflict-of-interest situations in which they find themselves.

In 2024, the compliance function collected 2,663 statements of conflicts of interest from members of the management team and certain professionals in key positions within the Group's perimeter. In addition, 185 spontaneous communications by professionals have been received reporting potential situations of conflict of interest.

Following the analysis of all communications, the compliance function recommended specific preventive measures in 61 cases.

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2,848 conflict of interest  
communications

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## Related transactions

In accordance with the provisions of the Procedure for related party transactions with members of senior management, delegated related party transactions and related party transaction lines and analogous regulations applicable in the subholding and head of business companies, the compliance units have collected 125 declarations from the members of senior management of their respective companies about:

- a) any conflicts of interest that they or their related parties may have with Group companies.
- b) and any related-party transactions they intend to carry out.

## Gifts and hospitalities

The Protocol for gifts and hospitalities sets out the principles to be observed by professionals for the offer and acceptance of gifts from third parties in the professional environment.

The compliance function has handled 794 queries within the Group's perimeter related to the acceptance of gifts and hospitalities received, especially during the Christmas season.

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794 queries  
regarding gifts and hospitalities

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## Compensation and performance

All persons joining the Group formally commit to comply with the principles of ethics and transparency established in our Code of ethics.

As a sign of this strong commitment, the Group's strategic goals include a series of sustainability indicators among which are goals related to the Compliance system. The achievement of these goals is linked to the variable remuneration of the management team.

In addition, the performance of each professional in accordance with the principles of ethics and transparency is one of the basic pillars of the annual performance review process, in which both the employee and their immediate supervisor participate.



## 5.5 Competition

In accordance with the provisions of the Protocol for fair competition of Iberdrola, S.A. and in the analogous regulations of the Group's companies, a series of measures and controls has been implemented with the aim of ensuring compliance with the legislation in force in this matter concerning the following areas:

Risk	Scope
<b>Collusion</b>	Retail of energy
	Wholesale market
	Tenders and public auctions
<b>Abuse of dominance</b>	Retail of energy
<b>Unfair competition</b>	Contracting
	Grid management
<b>Concentrations</b>	Consortia
	Corporate transactions
<b>Supplier relationships</b>	Tenders

## 5.6 Prevention of money laundering

Iberdrola Inmobiliaria, S.A.U., ("**Iberdrola Inmobiliaria**") due to the nature of the activity it carries out, is subject to the Law 10/2010, on prevention of money laundering and the financing of terrorism, of 28 April, (the "**Anti-Money Laundering Law**"), therefore the company has implemented the Procedure for action on the prevention of money laundering and financing of terrorism, the main purpose of which is to prevent this type of crime.

Although Iberdrola, S.A. and the other Spanish companies of the Group are not subject to the obligations of the Anti-Money Laundering law, the risk of committing this type of crime is included in their respective crime prevention programmes. As a consequence, the aforementioned companies have controls in place to suitably cover this risk.

With regard to Iberdrola Inmobiliaria, the company prepares an annual report on activities relating to the prevention of money laundering and the financing of terrorism and submits it to its Board of Directors.



In 2024, the Internal Control Body of Iberdrola Inmobiliaria, which supervises the prevention of money laundering and financing of terrorism, did not receive any reports of suspicious transactions, and there were no reports to the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offenses (“SEPBLAC”), nor has the aforementioned company received any communication, official request or notice of the opening of inspections by SEPBLAC.

In addition, EY has carried out the external expert audit of the Money Laundering Law, with a favourable result.

## 5.7 Artificial intelligence

The Company has a Policy on the responsible use of artificial intelligence tools, which establishes the principles that must govern the design, development and application of artificial intelligence tools, as well as the responsible use of these tools:

- Respect for human beings and social wellbeing.
- Diversity, non-discrimination and fairness.
- Culture of innovation.
- Privacy.
- Transparency.
- Security and resilience.
- Training and awareness-raising.

To ensure the attainment of the goals established in the policy, a coordination group led by Digital Transformation has been set up with the involvement of different areas of the Company, including Compliance, Internal Audit and Legal Services, among others.



# 06.

## Market abuse regulations



The Internal Regulations for Conduct in the Securities Markets (“**IRC**”) is an internal regulation that forms part of the Governance and sustainability system and applies to the members of the Board of Directors and senior management of Iberdrola, as well as:

- I. those other persons (“Affected Persons”) who, in accordance with the regulations in force at any given time, are designated by the Unit in light of their regular and recurrent access to information that may be considered Inside Information (as defined in the regulations themselves);
- II. persons who temporarily or transiently have access to Inside Information of the Company by reason of their participation or involvement in a transaction or an internal process involving access to Inside Information (“Insiders”); and
- III. the Company's treasury stock managers.

The currently applicable version of the IRC is available on the Company's corporate website and Employee Portal.

The IRC establishes rules for the management, control and transparent communication of Inside Information, as well as for the conduct of treasury share transactions, and imposes certain obligations, limitations and prohibitions on Affected Persons, Insiders and the Company's treasury share managers.

All of the above, in order to protect the interests of investors in the securities of the Company and the Group and to prevent and avoid any situation of abuse, without prejudice to encouraging and facilitating the participation of its directors and professionals in the capital of the Company within the strictest respect for the law in force.

The IRC entrusts the Unit with the function of ensuring compliance.

In accordance with the provisions of the IRC, the Unit maintains the following registers:

- Register of Affected Persons, which includes persons who have regular and recurrent access to Inside Information.
- Register of Treasury Share Managers, which includes the persons who manage the Company's treasury share transactions.
- List of Affected Securities, which at year-end 2024, are: (i) listed securities issued by the companies listed below; and (ii) financial instruments and contracts giving the right to acquire or transfer, or underlying, the following securities:

**The Internal Regulations of Conduct in the Securities Markets set out rules for the management, control and transparent communication of Inside Information**



Iberdrola, S.A.	SP Distribution, Plc.
Iberdrola Finanzas, S.A.U.	ScottishPower UK, Plc.
Iberdrola Finance Ireland, DAC.	SP Manweb, Plc.
Iberdrola International, B.V.	SP Transmission, Plc.
Avangrid, Inc.	Rochester Gas & Electric Corporation
New York State Electric & Gas Corporation	The Southern Connecticut Gas Company
The United Illuminating Company	Central Maine Power Company
Connecticut Natural Gas Corporation	The Berkshire Gas Company

The Unit also keeps at the disposal of the supervisory authorities copies of all Registers of Insiders communicated to it and an updated list of securities, instruments and contracts that are to be considered as Affected Securities under the IRC.

The measures and other actions carried out by the Unit in relation to the IRC are subject to annual review by an independent expert (Uría Menéndez), through a verification process. As a result of this process, the report for the 2024 financial year concludes that the Unit has adequately conduct the necessary actions to ensure compliance with the IRC and the applicable securities market regulations.



# 07. Separation of activities



Brazil, Spain, Mexico, the US and the UK each have their own sector-based regulations designed to ensure the supply of electricity and gas.

Generally speaking, this legislation allows certain activities, such as production and marketing (liberalised activities), to be carried out under free competition, while other activities are subject to a natural monopoly, including the distribution and transmission of electricity and gas (regulated activities).

Some of the aforementioned countries referred to require liberalised and regulated activities to be separate, so as to ensure transparent, non-discriminatory and efficient management of the electricity and gas systems.

The respective subholding companies have specific internal regulations on this matter, and its fulfilment is supervised annually by the competent compliance units.



# 08. Ethical culture



# 8.1 Training

## Global training programme

Training is one of the fundamental pillars of the compliance function and of the awareness of and compliance with the Code of ethics by all professionals in the Group's companies. Within this context, the compliance units plan their training activities yearly in collaboration with the corresponding People and Organisation divisions.

The training strategy stems from global training initiatives for the professionals of the Group's companies on compliance issues of a general nature and applicable to the majority of the workforce, and additionally develops specific training plans for certain groups of professionals for whom special and specific compliance risks have been identified. Accordingly, the Global Compliance Training Plan includes training activities specifically adapted to:

- Directors.
- Senior management.
- New hires.
- Managers and team leaders.
- Staff in key positions to mitigate risks.
- All other professionals.
- Value chain.

## Professionals

The compliance units use different training formats such as online courses, telematic courses, videos, and face-to-face training sessions taught by external professionals or by those responsible for the compliance function aimed at both full-time and part-time professionals.





## Governance bodies

On a frequent basis, the compliance units of the Group companies carry out training sessions with their respective governance bodies in accordance with the Global Training Plan.

In particular, on 22 October 2024, the Compliance officer appeared before the Company's Board of Directors for a training covering, among other matters, the implications of the Law 2/2023 on Whistleblower Protection applicable to those reporting regulatory infringements and the fight against corruption, updates on sustainability due diligence and the supervision of ethical risks arising from artificial intelligence.

# 8.2 Communication

## Communication plan

Dissemination and communication of ethical principles is another essential element of the Group companies' compliance system.

There is a Communications Plan approved by the Unit, for 2023-2025, setting the following goals:

- Ensuring that professionals perceive the value that Compliance actions entail for them as well as for the company.
- Raising the awareness of professionals about the most relevant risks associated with their professional activity and the regulations or recommendations in order to minimise them.
- Promoting the participation of professionals in the Compliance activities that require it.
- Encourage the involvement of managers and middle management in spreading the compliance culture among their teams.

For communication activities, the different available tools and channels have been used, selecting the most effective according to the specific features of each case. The support, collaboration and advice of the Communications Division have been available at all times.



## Number of communication initiatives

Internal activities	
Mailing	151
Newsletter	25
Information screens	6
Employee portal	75
Informative meetings	19
Video	8
WhatsApp	2

External activities	
Professional events	14
Mailing	5
Press	7
Social media	18
Corporate website	10

Among the numerous communications activities carried out during the year, the video disseminated on social media where the Compliance officer, using a casual tone, accepted the challenge to review in under a minute the main milestones and metrics of the Compliance system stands out.

### Awareness of the supply chain

#### Supplier of the Year Awards

In 2024, Iberdrola has held the 9th edition of the “Supplier of the Year Awards” to promote and drive excellence among its suppliers. The different award categories recognise suppliers’ works in areas as relevant for Iberdrola as service quality and response, health and safety, environment, sustainability, internationalisation, job creation, competitiveness and innovation and diversity and equality.



A new aspect in this 2024 edition was the inclusion of a new category named “Ethics and Compliance” aiming at recognising the supplier that has shown the greatest commitment to ethical business conduct, establishing an effective compliance system that ensures transparency and integrity in all its activities.

This award, widely disseminated among the press and social media, is once again proof of the Group’s companies’ effort in driving the implementation of robust compliance systems in its supply chain.

### **Training of the supply chain**

In 2024, Iberdrola has reiterated its commitment with the dissemination of ethical business conduct and compliance through several initiatives promoting the development of robust compliance systems among its supply chain:

- On the corporate website ([www.iberdrola.com](http://www.iberdrola.com)) several content to promote ethical principles in the supply chain have been made available to suppliers. Among the material available, the interactive online module designed to improve the knowledge our suppliers have of the key elements of an effective compliance system stands out.
- Under the framework of the UN Global Compact’s Training Program: Sustainable Suppliers, face-to-face and remote sessions on crucial Compliance matters, such as the Code of ethics and crime prevention, have been held, and more than 1,500 professionals from several suppliers have attended those sessions.
- A mailing campaign addressed to 1,160 suppliers has been carried out to highlight the importance of internal whistleblowing channels, reminding them of the whistleblowing channels existing in the Iberdrola Group’s companies and encouraging them, if applicable, to implement and disseminate their own channels among their professionals and supply chain.
- Iberdrola has helped 19 key suppliers in the development of their compliance systems. This help includes specific meetings to know key elements of their compliance system, the assessment of documentation and the establishment of an agreed road map to improve their compliance system. The purpose of these sessions is to reinforce the supplier's compliance system so it can be subject to an external audit in accordance with the best practices in the matter.



## 8.3 Effectiveness measurement

### Ethical culture survey

The compliance units conduct the ethical culture survey among professionals aimed at measuring the degree of ethical culture at Iberdrola and its Group and monitoring its evolution over time. This survey, which is conducted every two years and is addressed to all staff, covers the following issues:

- Knowledge of the compliance system.
- Perception of the compliance function.
- Irregularities observed and reported.
- Pressure to commit irregularities.
- Organisational justice.
- Perception of the integrity of colleagues, managers and senior management.

In the survey carried out in 2024, in which 13,633 professionals (33% of the workforce) have participated, shows that these professionals highly value the ethical culture in the Group, and they believe the conduct of the professionals and the management teams is aligned with the guidelines set in our Code of ethics.

The survey has also exhibited the positive effect it has on the use of the whistleblowing channels the fact that professionals with people in charge openly discuss compliance risks with their team. Thus, with the aim to boost the use of the whistleblowing channels, different initiatives to encourage this dialogue between team leaders and their staff are planned in 2025.

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13,633 employees  
have participated in the ethical culture survey

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### Supplier survey

In 2024 the 9th edition of the Supplier Survey has been held and 2,251 took part in it. This survey is a key tool to identify the aspects best valued by suppliers in our procurement process and those where there is area for improvement.

As in previous editions, the survey includes an “Ethics and Compliance” section where participants are asked (i) if they know there is a whistleblowing channel and (ii) if they have observed any irregular conduct by any Iberdrola and Group professional. In this edition, 53% of the suppliers surveyed declare to be aware of the existence of Iberdrola’s whistleblowing channel and 2.3% declare to have observed some irregular conduct.



## Data analytics

The measuring of the effectiveness of the actions carried out by Compliance on training and awareness is one of the priorities of the compliance units. For this reason, Iberdrola has developed a data model that calculates the correlation between awareness actions (training sessions and internal communications) and the internal reporting system activities (claims and queries), identifying communication patterns that are even more effective.

The model also monitors through the tool Google Analytics professionals' interaction with content related to ethics and compliance available on the Employee Portal (policies and regulations downloaded, content views, etc.).

The analysis of these data and their evolution over time allow to measure the effectiveness of awareness actions and set recommendations and improvement plans adapted to the specific cases of each of the Group companies.



# 09. Internal reporting system



Monitoring activities are conceived as detection and control mechanisms for verifying the effectiveness of the preventive measures implemented. They also enable the continuous improvement of the compliance systems. The key element to detect unlawful conduct is the whistleblowing channels set up at Iberdrola and its Group.

The management of the internal whistleblowing channels provided for in the Code of ethics and in the Policy on compliance and the internal information and whistleblower protection system corresponds to the compliance units of the different companies of the Group.

The Group's internal whistleblowing channels are configured as tools made available to all shareholders, directors, professionals, suppliers, and other third parties as determined by law to report conduct that may involve committing any irregularity or any act that is unlawful or contrary to law or to the Governance and sustainability system. In addition, these channels can be used to submit queries on aspects relating to the interpretation of and compliance with the Code of ethics and to any matter relating to Compliance. All communications received through these internal channels are considered confidential information and, in the case of claims, may be anonymous.

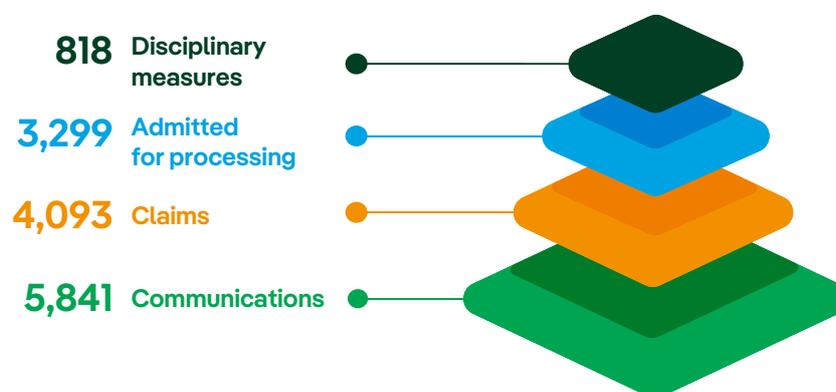
The Group's companies have established for the members of their governing body, professionals and suppliers the obligation to report, through the aforementioned internal channels, about any irregularity they are aware of.

In all cases, the Group is firmly committed, as reflected in the Code of ethics, in the Policy on compliance and the internal reporting and whistleblower protection system and in the rest of the procedures and internal regulations on the matter, to the prohibition of retaliation against those who make use of the aforementioned internal channels, except in cases of bad faith.

These internal whistleblowing channels, which enable anonymous reports, as well as the principles governing the processing of communications received through them are available 24 hours a day in the Group's companies web pages as well as the employee's portal.

The processing of claims and queries made through the internal whistleblowing channels corresponds to the competent compliance unit, as the case may be. They both are an essential source of information for identifying points for improvement in the compliance system and additional prevention and control mechanisms.

Communications received by the Group through internal whistleblowing channels in 2024 totalled 5,841, of which 1,748<sup>4</sup> were queries and 4,093 were claims.



4. Not included 9 queries received during 2024 through the Group's foundations internal whistleblowing channels.



Of the 4,093 claims 3,299 have been admitted for processing.

In 2024, 818 disciplinary measures<sup>5</sup> have been adopted within the perimeter of the Group since it has been evidenced there has been an irregular conduct or a conduct contrary to the internal regulations or the Code of ethics. 94% of the disciplinary measures have been imposed on suppliers (or by suppliers to their professionals) and they correspond mainly to irregularities committed by external energy retail agents.

Admitted for processing by nature	
Fraud in sales	2,713
Harrassment and discrimination	149
Theft and fraud	112
Conflict of interest	64
Inappropriate conduct between professionals	39
Health and safety	19
Others	203
<b>TOTAL</b>	<b>3,299</b>

Disciplinary actions by nature	
Supplier penalty	748
Dismissal	46
Written notice	11
Oral notice	6
Temporary suspension	4
Supplier contract termination	3
<b>TOTAL</b>	<b>818</b>

5. Of the 818 disciplinary measures imposed, 27 correspond to claims received in previous years.



# 10. Monitoring and review



## 10.1 Monitoring indicators

On a frequent basis, the Unit supervises the effectiveness of the compliance systems of the Company and of the Group companies by reviewing the indicators of the main compliance risks (KRIs) as well as the effectiveness of the compliance units' activities (KPIs). The indicators cover the following aspects, among others:

- Operations in countries considered by the compliance function to be above a higher-than-normal level of risk.
- Third-party risk assessment.
- Internal whistleblowing channel activity.
- Monitoring risky operations.
- Ethical development of suppliers.
- Training activities.
- Internal and external communication initiatives.
- Conflicts of interest.
- Professionals' background checks.
- Gifts and hospitalities given and received by professionals.
- Legal proceedings involving professionals due to their professional activity and work in the Group.
- Audits and reviews of the Group companies' compliance systems.

## 10.2 Internal Audit

Internal Audit, as an independent function, conducts periodic audits of the compliance systems of the Group's companies, making the appropriate recommendations for their continuous improvement.

The Internal Audit division formalised a coordinated assurance approach to the monitoring of the Compliance systems, which has three main lines of action:

### **a) Internal Audit activity plan**

In general, the Internal Audit area carries out an on-going review of the compliance systems of the Group's companies through the specific audit works included in the annual activity plans approved by the respective governing bodies.



## b) Specific review of the different areas of the Compliance System

Specifically, and on a multi-annual basis, Internal Audit carries out a review of the different areas that make up the Compliance system:

- Code of ethics, in relation to the specific competencies entrusted to the compliance units.
- Crime prevention programme (related policies, procedures and protocols).
- Internal regulations for conduct in the securities markets.
- Separation of regulated activities in the Group's companies.

## c) Collaboration in investigations

At the request of the compliance units, the Internal Audit division will collaborate in investigations that may affect the corresponding companies' Internal Control System.

Within this framework of action, during 2024, the Internal Audit division has audited, among other works, the fulfilment of the obligations assigned to the compliance units by their respective governing bodies in their corresponding regulations. Moreover, it has also conducted a specific audit on the operation of the Internal reporting systems (whistleblowing channels) of the Group's companies.

The recommendations presented have been included in an action plan to monitor their implementation.

# 10.3 External reviews

## Compliance Leader Verification

The Compliance Leader Verification certification, awarded by the Ethisphere Institute, a US-based global leader in defining best practices in compliance, is given to companies that not only comply with current regulations, but also demonstrate the existence of an internal culture and leadership that promotes ethical values in the conduct of their business.

During 2024, ScottishPower Limited ("ScottishPower") (subholding company in the United Kingdom) has renewed the certificate obtained for the first time in 2022 and Iberdrola México, S.A de C.V. (subholding company in Mexico) has obtained it for the first time. Furthermore, the Company and Avangrid, Inc (subholding company in the United States) have maintained their certifications in force.



## ISO 37001 “Anti-bribery management system” and UNE 19601 “Criminal compliance management system” certifications

In 2024, AENOR has certified the Compliance system of the Spanish Iberdrola Group’s companies in accordance with:

- I. the UNE 19601 standard on criminal compliance management systems, and/or
- II. the UNE-ISO 37001 standard on anti-bribery management systems.

These certifications were first obtained by the Company in 2017.

On the other hand, ScottishPower, Iberdrola México and Neoenergía also have the UNE-ISO 37001 certification.

## External audit of the crime prevention programmes

In 2024, the law firm Uría Menéndez has issued an external audit report on the effectiveness of the crime prevention programmes implemented in the various Spanish Group’s companies. The review concludes that these programmes incorporate and adopt the best international practices, are effective and are useful in significantly reducing the risk of commission of the crimes that they seek to prevent. Likewise, the assessment work has also brought forth certain recommendations for improvement, the implementation of which is coordinated by the respective compliance units.

The crime prevention programmes have been subject to the aforementioned annual audit since 2015.

**The  
Compliance  
system is  
audited  
externally  
every year**

## Audit of the internal reporting system

The Company requests on a frequent basis an independent audit on the operation of the internal reporting channels (whistleblowing channels). The main objectives of this audit are:

- Verify that upon reception of an anonymous report through the internal whistleblowing channel form, it is materially impossible to find out the whistleblower's identity.
- Ensure that the content of the reports received through the internal whistleblowing channel is not accessible to third parties or to anyone other than the user of the whistleblowing tool.

Following the review conducted by Tarlogic and based on the evidence obtained, it has been concluded that the security measures implemented guarantee the confidentiality, integrity and availability of the data managed by the platform.



# 11. Recognition



## 11.1 World's Most Ethical Companies List

The Company and Avangrid have been recognised, for the 11th and 6th consecutive year, respectively, as two of the world's most ethical companies, according to the 2024 World's Most Ethical Companies ranking prepared by the Ethisphere Institute.

In drawing up this list, Ethisphere assesses the existence of an effective compliance system, reputation, the presence of an ethical culture at all levels of the organisation and in all its activities, corporate governance and social responsibility. This recognition was granted to 136 companies worldwide in 2024; Iberdrola was the only Spanish company on the list.

## 11.2 Expansión awards

In March 2024, Iberdrola was recognised as runner up in the Expansion Compliance Awards in the category "Best use of disruptive technologies in Compliance matters". In previous years, the jury of the Expansión Compliance Awards granted the Company the "Most Innovating Company of the Year" award (2023), highlighting the novelty among the professional community of the publication of the first edition of the Compliance System Transparency Report, and the "Company with the best Compliance Practices" award (2019), in recognition of the effectiveness and robustness of the compliance systems of the Group's companies and the development of the company's ethical culture.

These awards represent a return on the efforts taken by the companies and their managers to implement effective compliance systems in their organisations.

## 11.3 Haz Foundation

For the second year in a row, in 2024 Iberdrola has been considered the most transparent IBEX 35 company according to the new "Transparency and good governance on ethics practices and compliance of IBEX 35 companies" report, prepared by Fundación Haz. This report analyses the voluntary transparency in the public information of the companies that make up the main Spanish stock market index on their policies and practices in the areas of ethics and compliance.



# 12. Dissemination and promotion of business ethics



The compliance function conducts activities aimed at promoting the adoption of effective compliance systems in the business fabric, as well as the development and professionalisation of the compliance function in organisations.

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## €326 thousand in 2024 earmarked by the Group to promote business ethics

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In line with the above, the following activities, among others, were carried out during the year:

- Iberdrola has been a member of the United Nations Global Compact since 2002 and is committed to the dissemination of the Ten Principles of the United Nations Global Compact, including Principle Ten: Companies should work against corruption in all its forms, including extortion and bribery.
- Iberdrola is a member of the Anti-Corruption Leaders Hub, a group promoted by the Organisation for Economic Co-operation and Development (OECD) and made up of representatives from the public and private sectors who collaborate at international level to prevent corruption and promote business ethics.
- In addition, Iberdrola collaborates with the programme "Compliance without borders", promoted by the OECD whereby Iberdrola's Compliance professionals selflessly collaborate in the development of the compliance systems of public entities and companies in other countries.
- Since 2018, the Company has been promoting the Iberdrola Chair of Economic and Business Ethics together with Comillas Pontifical University. The main objective of this initiative is to promote the study and dissemination of the principles of business and professional ethics in all areas.
- The Company is a premium sponsor of the Spanish Compliance Association (ASCOM) and is a member of the Corporate Integrity Forum of Transparency International Spain.
- During the 2024 financial year, the Company has continued to collaborate with the Polytechnic University of Madrid through the "Iberdrola-UPM Chair: SDG Chair" for the development of the Sustainable Development Goals ("SDGs") under a collaboration agreement renewed in 2021. One section of the Chair addresses the SDG "Peace, justice and solid institutions" with the aim of promoting good practices in ethics and compliance and the fight against fraud and corruption.
- In collaboration with the Educación para Compartir association, Iberdrola has developed the "Games, values and action" project in Mexico. This is a series of workshops, aligned with SDGs, aimed at promoting fair play, empathy, respect, gender equality, tolerance, teamwork and responsibility among children. 2,778 primary students and 113 teachers from 10 schools in Puebla and Guanajato participated in these workshops, making more than 8,600 people benefitting from the workshops in their four editions.



Iberdrola