

Response from Iberdrola
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Is Iberdrola applying a single global standard, aligned with the legal requirements set forth in the UFLPA, to exclude Uyghur forced labour across its supply chains, and to not bifurcate its supply chains?

Respect for human rights is a main pillar of Iberdrola's culture of social responsibility. Iberdrola firmly rejects all forms of child labour and forced or compulsory labour. This commitment is included in our Policy on Respect for Human Rights and in the Code of Ethics, which is included in all contracts with suppliers.

In relation to legal requirements, Iberdrola develops a dual, global and local, approach: We have a global standard which is fully committed to exclude forced labour in our supply chains. And, in each local geography, we comply with all applicable laws, such as the Modern Slavery Act in the UK and Australia or the UFLPA in the US. Consequently, we don't apply the detailed requirements established by the US Government in other countries.

In our global model we apply a common and global set of contract provisions and supply chain analysis to guarantee that no forced labour is used in our supply chains. In the case of solar photovoltaic panels, these provisions include, among other: the supplier's commitment with our Code of Ethics, express rejection by the supplier of use of forced labour in the whole supply chain, limitations of origin of components and Iberdrola's right to audit and establish traceability mechanisms.

Is Iberdrola committed to not re-exporting goods detained under the auspices of the UFLPA to other markets?

Iberdrola has separate contracts for solar photovoltaic panels for the US and other countries. Although contractually there are provisions that could allow the option to re-export goods, it is not in our plans to do so, and no re-exporting of goods has been made.

If Iberdrola is committed to the above statements, how is it implementing these commitments?

[See answer to question 4.](#)

If Iberdrola is not committed to a single global standard, how is it ensuring that goods imported into markets other than the US are not tainted?

Iberdrola is committed to a global standard and to the highest respect for human rights. Although our global standard covers elements included in the legal requirements set forth in the UFLPA, it isn't exactly the same. In contracts for the US market, we establish additional measures to guarantee we strictly follow the UFLPA requirements.

The Iberdrola global standard includes a common and global set of contract provisions and supply chain analysis to guarantee that no forced labour is used in our supply chains. In the case of solar photovoltaic panels, these provisions include, among other: the supplier's commitment with our Code of Ethics, express rejection by the supplier of use of forced labour in the whole supply chain, limitations of origin of components and Iberdrola's right to audit and establish traceability mechanisms.

Our Supply Chain model includes a specific ESG evaluation of all relevant suppliers, including those involved in solar energy equipment, and a specific ESG and human rights audit plan to suppliers.

Furthermore, Iberdrola is an active member of the Solar Stewardship Initiative, driven by Solar Power Europe and Solar Energy UK. This Initiative is being designed to further develop supply chain transparency and strengthen confidence in how, where, and by whom products are manufactured. It will work to establish and access verifiable information on current levels of transparency, and on overall ESG compliance in the solar supply chain.