

# Equal Opportunity and Anti-Harassment Policy

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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.

The Board of Directors of IBERDROLA, S.A. (the “**Company**”) has the power to design, assess and continuously revise the Governance and Sustainability System, and specifically to approve and update the corporate policies, which contain the guidelines governing the conduct of the Company and of the companies belonging to the group of which the Company is the controlling entity, within the meaning established by law (the “**Group**”).

In fulfilling these responsibilities, aware of its commitment to the workforce as its main strategic asset and the key to its business success, and in accordance with the provisions of the *Policy on Respect for Human Rights* and the *People Management Policy*, the Board of Directors hereby approves this *Equal Opportunity and Anti-Harassment Policy* (the “**Policy**”).

## 1. Purpose

This *Policy* seeks to create a fair and respectful working environment by establishing measures that promote equal opportunity, foster the diversity and inclusion of the professionals of the Group’s companies, and contribute to the eradication of conduct contrary to the values of the Iberdrola Group’s companies and to the ethics-based culture thereof, all in accordance with applicable law in each country and following best international practices, including the provisions of the Sustainable Development Goals (SDGs) approved by the United Nations (UN) in these areas.

The management of diversity and fostering of inclusion are key elements of the Iberdrola Group’s business strategy.

## 2. Scope of Application

This *Policy* applies to all companies of the Group, as well as to all investees not belonging to the Group over which the Company has effective control, within the limits established by law.

Without prejudice to the provisions of the preceding paragraph, listed country subholding companies and their subsidiaries, based on their own special framework of strengthened autonomy, may establish an equivalent policy, which must be in accord with the principles set forth in this *Policy* and in the other environmental, social and corporate governance and regulatory compliance policies of the Governance and Sustainability System.

At those companies in which the Company has an interest and to which this *Policy* does not apply, the Company will promote, through its representatives on the boards of directors of such companies, the alignment of their own policies with those of the Company.

This *Policy* shall also apply, to the extent relevant, to the joint ventures, temporary joint ventures (*uniones temporales de empresas*) and other equivalent associations, if the Company assumes the management thereof.

## 3. Definitions

- **Harassment** is defined as unwanted verbal or physical conduct of a moral or sexual nature that is intended to or has the effect of attacking the dignity of a person or creating an intimidatory, hostile, degrading, humiliating or offensive environment for such person. Examples of conduct that is deemed to be harassment include but are not limited to derogatory impersonations of a person, sexual advances, imitations of the effects of a disability, disrespectful comments, racist, degrading or offensive gestures or images, the use of homophobic, transphobic or biphobic language, and ridiculing someone’s religion or beliefs.
- **Discrimination** is any distinction, exclusion or preference based on race, colour, sex, religion, political opinion, national background or social origin that has the effect of nullifying or impairing equality of opportunity or treatment in the workplace.
- **Diversity** is the set of visible and non-visible characteristics that make people unique and singular, that is, the richness that each person contributes thanks to their variety.
- **Fairness** means distinct treatment as regards specific situations, always with the purpose of achieving equality in the exercise of rights.
- **Equality** means that all persons have the same rights, resources and opportunities regardless of any particular status.
- **Inclusion** is the recognition and appreciation of the different perspectives that each individual can contribute, generating opportunities so that everyone can realise their full potential and also fostering a sense of belonging that means they feel valued and part of a group or community.

## 4. Main Principles of Conduct in connection with Equal Opportunity

To achieve the aforementioned objectives and commitments in the area of equal opportunity, the following main principles of conduct that must govern the labour relations of the companies making up the Group are adopted and promoted:

- a. ensure non-discrimination among its professionals and positioning against any conduct or practice associated with prejudice on grounds of nationality, ethnic origin, skin colour, marital status, family responsibilities, religion, age, disability, social status, health, gender, sexual orientation, gender identity and expression, or any other condition or characteristic of a person that is not related to the requirements to perform their job;
- b. guarantee the quality of employment, fostering the maintenance of stable and high-quality jobs, with fair salaries and occupational contents that guarantee a continuous improvement in the abilities and skills of professionals;
- c. in line with the *Policy on Respect for Human Rights*, guarantee the internationally established rights of freedom of association in order to preserve the choice of each person in their relationship with trade unions and the conduct of these organisations in the defence of their legitimate interests;
- d. attract and choose the best professionals by means of selection tools and systems based on the knowledge and abilities of the candidates;





- e. ensure that professionals are properly integrated into their workgroup, establishing fair remuneration conditions based on their job position;
- f. standardise working conditions and the benefits received by part-time and full-time professionals;
- g. ensure the education and training of all professionals in the knowledge and skills required for the proper performance of their work;
- h. use of neutral and objective criteria related to merit, ability and performance to assess, recognise and remunerate its professionals;
- i. endeavour to ensure that the artificial intelligence systems used in the processes relating to the selection, hiring, management of labour relations, training and promotion of professionals are developed and used in a way that promotes equality at the same time as eliminating biases with discriminatory effects and unfair prejudices, and permit adequate tracking and transparency, ensuring that users are aware that they are communicating or interacting with an artificial intelligence system, pursuant to the provisions of the *Policy on the Responsible Development and Use of Artificial Intelligence Tools*; and
- j. promote the organisation of working conditions, allowing for the reconciliation between personal and working life of all professionals employed by the Group's companies and protecting them in situations such as pre-adoption and adoption.

## 5. Main Principles of Conduct in connection with Diversity and Inclusion

The Company shall adopt the following measures to promote diversity and inclusion, understood as an organisational value and a differentiating competitive element:

- a. promote an organisational culture and management processes that enable all professionals of the Group's companies to contribute their knowledge, experiences and abilities, regardless of any personal or social conditions or circumstances;
- b. reinforce the commitment of the Group's companies to equality, especially gender equality, both within their respective organisation and in the communities in which they have a presence, and raise awareness on this matter in both spheres;
- c. strive to achieve a balanced representation of gender within the various decision-making bodies and levels, guaranteeing participation in all consultative and decision-making areas of the Group's companies on the basis of equal opportunity;
- d. propose affirmative action measures and measures to recognise those who contribute to correcting inequalities that appear and to promote access and progress by the less represented gender;
- e. promote programmes of collaboration with educational institutions to encourage the presence of the less represented gender in careers and training programmes relating to the businesses carried out by the Group's companies;
- f. protect pregnancy, childbirth and post-delivery as specific situations of the female group, avoiding negative repercussions thereof on their professional career, as well as incentivise co-parenting between women and men;
- g. collaborate in the fight against gender violence through the establishment of specific programmes that include measures of protection, support and information for victims;
- h. promote physical and technological accessibility and support professionals with disabilities, encouraging the effective occupation thereof;
- i. recognise that the international character of the companies making up the Group and the contribution made by people of different origins, races and ethnicities represents a source of enrichment, which is maintained and encouraged;
- j. facilitate the internal mobility and interaction of professionals to create networks and teams that take advantage of this multiculturalism;
- k. incentivise coexistence and the exchange of knowledge between different generations as a source of continuous enrichment and innovation;
- l. implement measures to encourage integration and well-being and increase pride at belonging to different groups;
- m. foster an inclusive culture based on respect and collaboration;
- n. include content in leadership programmes that encourages better decision-making in processes related to people management and contribute to a more diverse business and a more inclusive culture;
- o. foster inclusive communication, both internally and externally, reflecting the diversity of the persons forming part of the Company and the Group;
- p. inform and communicate to the communities in which the companies of the Group do business their commitment to diversity and inclusion, so as to make them more attractive to different groups; and
- q. standardise working conditions and the benefits received by part-time and full-time professionals.

## 6. Main Principles of Conduct to Prevent Harassment and Discrimination

The Company has a firm commitment to prevent and combat harassment and discrimination, and shall adopt the following measures for this purpose:

- a. foster a preventive culture as regards any expression of any form of workplace violence, intimidation or harassment, through dissemination, education and training activities that occur with sufficient regularity to ensure up-to-date knowledge in this area;
- b. encourage leaders to set an example within their purviews, promoting a respectful and healthy working environment;
- c. zero tolerance towards any conduct that involves intimidation or harassment;
- d. implement solutions and measures to safeguard the well-being of the persons affected by such behaviours, guaranteeing that there will be no retaliation; and
- e. adopt the measures that are necessary, including such disciplinary measures as are deemed appropriate, if applicable.

## 7. Instruments

In order to achieve the objectives set out in this *Policy*, the Company has the rules established in the Governance and Sustainability System, particularly in the *Compliance and Internal Reporting and Whistleblower Protection System Policy*, in addition to the Diversity and Inclusion Division of the Company (or such division as assumes the duties thereof at any time), which is responsible for implementing, monitoring and verifying compliance with this *Policy*.

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This *Policy* was initially approved by the Board of Directors on 16 December 2008 as the *Equality and Reconciliation Policy*. It subsequently approved a *Diversity and Inclusion Policy* as a result of the Company's pioneering spirit and the ongoing review of the Governance and Sustainability System. On 19 April 2021 the Company's Board of Directors approved the consolidation of the *Diversity and Inclusion Policy* and the *Equal Opportunity and Reconciliation Policy*, creating this single policy, which was last amended on 25 February 2025, and which was renamed the *Equal Opportunity and Anti-Harassment Policy*.

