

SSE's Human Rights and Modern Slavery Statement

sse

2023

About SSE

SSE is a leading generator of renewable electricity in the UK and Ireland and one of the largest electricity network companies in the UK. It is driven by a purpose to provide energy needed today while building a better world of energy for tomorrow. It develops, builds, operates, and invests in low-carbon electricity infrastructure in support of the transition to net zero, including onshore and offshore wind, hydro power, flexible thermal generation, electricity transmission and distribution networks, alongside providing energy products and services to customers. SSE's ambitions for the development of renewable energy now extend beyond the British Isles to carefully selected international markets, including Asia-Pacific, Europe, and North America. UK-listed and headquartered in Perth, SSE is a major contributor to the economies in the UK and Ireland. It employs around 12,000 people and is real Living Wage and Fair Tax Mark accredited.

About this report

This is SSE's 2023 Human Rights and Modern Slavery Statement ('the statement') responding to the requirements of the Modern Slavery Act 2015 ('the Act'). This statement is made pursuant to section 54(6) of the Act and constitutes SSE's slavery and human trafficking statement for the financial year ending on 31 March 2023. All of SSE's previous Human Rights and Modern Slavery Statements can be found on **sse.com/sustainability/policies-and-assurances**. Where SSE has operational control of a joint venture, that entity is covered by the policies and processes applicable to wholly owned SSE businesses unless otherwise stated. The full list of businesses covered by this Human Rights and Modern Slavery Statement can be found on pages 23 to 27.

Human rights abuses and modern slavery in all its forms are unacceptable to SSE. It therefore has a responsibility to both understand and reduce human rights risk within its businesses and supply chain.

SSE is fully committed to upholding the UN Guiding Principles on Business and Human Rights, the aims of the UN Sustainable Development Goals (SDGs), the principles underpinning the UN Global Compact, of which it is a signatory. Furthermore, it recognises the International Bill of Human Rights and the fundamental rights set out by the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, which are:

- (a) freedom of association and the effective recognition of the right to collective bargaining;
- (b) the elimination of all forms of forced or compulsory labour;
- (c) the effective abolition of child labour; and
- (d) the elimination of discrimination in respect of employment and occupation.

Since publishing its first Modern Slavery Statement in 2016, SSE has continuously increased transparency about its approach to human rights and modern slavery whilst also ensuring this approach continues to develop.

SSE actively encourages feedback on the content of this Human Rights and Modern Slavery Statement from its stakeholders. Please get in touch by emailing **sustainability@sse.com**.

This statement sets out the steps taken by SSE between 1 April 2022 and 31 March 2023 to identify and prevent human rights abuses and modern slavery existing within its business and supply chains. It was approved by the SSE plc Board of Directors on 24th August 2023.

Gregor Alexander Finance Director, SSE plc

What are human rights?

Human rights are moral principles and norms for standards of human behaviour and are regularly protected in law. Every human being is entitled to human rights, without discrimination and regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.

What is modern slavery?

Modern slavery is a violation of human rights, which involves the slavery of people, prevents the right to freedom of movement, and causes other rights violations. The definition of modern slavery is broad and includes forced labour, servitude, slavery, human trafficking, debt bondage, forced or servile marriage, descent-based slavery, and child labour.



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SSE's Human Rights and Modern Slavery Statement

SSE's vision, strategy, and purpose

OUR PURPOSE

To provide energy needed today while building a better world of energy for tomorrow.

OUR VISION

To be a leading energy company in a net zero world.

OUR STRATEGY

To create value for shareholders and society in a sustainable way by developing, building, operating and investing in the electricity infrastructure and businesses needed in the transition to net zero.



OUR GOALS

SSE's 2030 Goals, aligned to the UN's SDGs, provide important milestones on the journey to net zero.

More about our progress on page 22 of the Annual Report 2023



Cut carbon intensity by 80%

Reduce scope 1 carbon intensity by 80% by 2030, compared to 2017/18 levels, to 61gCO_e/kWh.



Increase renewable energy output fivefold

Build a renewable energy portfolio that generates at least 50TWh of renewable electricity a year by 2030.



Enable low-carbon generation and demand

Enable at least 20GW of renewable generation and facilitate around 2 million EVs and 1 million heat pumps on SSEN's electricity networks by 2030.

OUR VALUES

All of this is underpinned by a set of core values designed to guide decisions and actions in SSE.

Safety If it's not safe, we don't do it.

Service

We are a company that customers can rely on.

Efficiency

We focus on what matters.

Sustainability

We do things responsibly to add long-term value.





Champion a fair and just energy transition

Be a global leader for the just transition to net zero, with a guarantee of fair work and commitment to paying fair tax and sharing economic value.

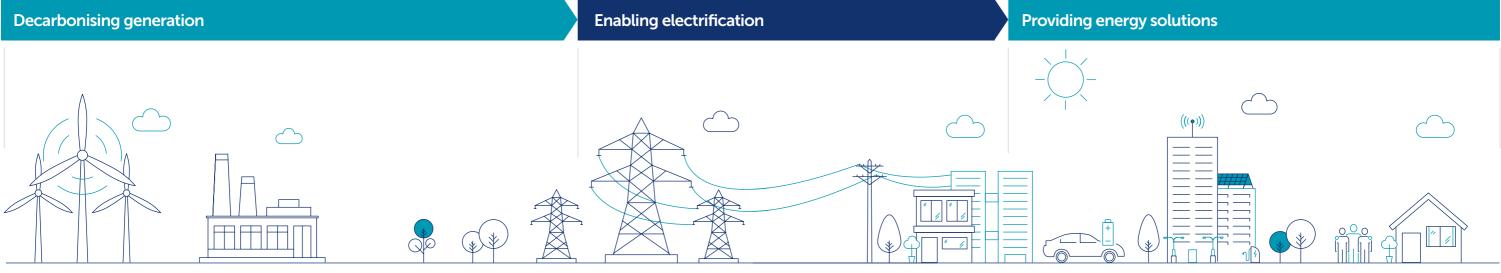
Excellence We continually improve the way we do things.

Teamwork

We work together, respect each other and make a difference.

SSE's Business structure

A strategically coherent business mix focused on net zero



SSE Renewables

What it does

Develops, builds, operates, and invests in assets that generate electricity from renewable sources. Solar and battery generation have moved from Enterprise to Renewables from 1st April 2023.

1,655 Employees 59.5% of SSE's supply chain spend (including joint ventures)

SSE Thermal

What it does

Generate electricity from thermal sources, supporting balancing of the electricity systems in the UK and Ireland. SSE Thermal's Gas Storage business holds around 40% of the UK's conventional underground storage capacity, which provides time- critical response to unpredictable weather conditions and energy market fluctuations.

628 Employees 9.3% • of SSE's supply chain spend

Energy Portfolio Management

What it does

Provides energy trading, risk management and settlement services, as well as other analytical support and insights.

284 Employees

0.2% O of SSE's supply chain spend

SSEN Transmission

What it does

Owns, operates, and maintains the electricity transmission network in the North of Scotland.

1,312 Employees

10.2% • of SSE's supply chain spend

SSEN Distribution

What it does Owns, operates, and maintains the electricity networks in the North of Scotland and central southern England.

4,264 Employees 11.9%

of SSE's supply chain spend

Customers

What it does

Provides energy and related services to households, businesses and public sector organisations across the UK and Ireland.

1,824 Employees

2.9% • of SSE's supply chain spend

SSE Enterprise

What it does

Invests in, builds, and connects localised flexible energy infrastructure. This includes operating heat networks and offers integration, aggregation, and trading capability. Solar and battery generation have moved from Enterprise to Renewables from 1st April 2023.

SSE Corporate

What it does

Provides HR, legal, finance, IT, procurement, investor relations, corporate affairs, sustainability, and other services for SSE Group.





Understanding SSE's direct and indirect workforce

SSE's business activities are predominantly located in the UK and Ireland, with 99% of its workforce based there. However, SSE's ambitions for the development of renewable energy now extend to carefully selected international markets, including Asia-Pacific, Europe, and North America. As SSE expands in size, and geographical locations, protecting human rights remains a priority.

A framework for fair and decent work

SSE has a well-established framework for guaranteeing fair and decent work which is focused on developing its existing workforce as well as investing in the future skills needed to deliver net zero. It does this whilst ensuring it creates a workplace which is inclusive to all. This framework is underpinned by the fundamental principles defined by the International Labour Organisation (ILO) and the UN Global Compact.

SSE publishes extensive information about its direct and supply chain workforce within its 2023 Annual Report and Sustainability Report which can both be found on **sse.com.** SSE has also been a supporter and contributor to the workforce disclosure initiative (WDI) since its pilot in 2016. The WDI is an investor backed questionnaire focused on companies' management of workers in their direct operations as well as their supply chains.

Providing a safe and secure workplace

Safety remains SSE's first priority with the objective that 'everyone gets home safe'. SSE has a well-established governance framework which underpins the safety of everyone who works for and encounters the Company. Its safety management system is certified to the internationally recognised standard ISO45001

The Total Recordable Injury Rate (TRIR) for direct employees and contractors combined was 0.19 per 100,000 hours worked, up from 0.17 in 2021/22. This increase reflects a significant surge in investment and construction, and an associated rise in contractor hours worked. 2023 was a challenging year for safety performance. This safety performance is in the context of the tragic fatality of one of SSE's contractor's employees, Liam Macdonald. Further detail on SSE's TRIR is outlined in Table 12, with additional information on contractor safety outlined on pages 66 and 164 of SSE's Annual Report 2023.

SSE seeks to embed a strong safety culture and to ensure that all those working on its behalf feel confident to speak up around safety. In SSE's 2022 all-employee survey, which had a 79% response rate, 92% of employees said that their manager sets the right example when it comes to Safety, Health and Environment and 94% said that SSE makes it easy for people to do the right thing on Safety, Health and Environment.

SSE also performs monthly checks to review information around the amount of overtime being worked by SSE employees across different areas of the business. Each business implements a process to monitor and manage the working hours of employees to control fatigue risks from excessive working hours.

Direct workforce

The majority of SSE's direct workforce is based in the UK or Ireland. At 31 March 2023, SSE had 12,180 direct employees who work across offices, depots, operational sites and construction sites, this include 100 employees outside of the UK and Ireland. 92% of employees were based in the UK and 7% were based in Ireland. Given the nature of SSE's business and operations, SSE's workforce tends to be highly skilled with employment terms and conditions to match. At 31 March 2023, SSE's employees had an average length of service of 8.7 years and 95% of employees were on permanent contracts. An average employee's earnings were £42,691 and each employee received an average of 19.7 hours of training over the year. Women comprised 30% of SSE's workforce at 31 March 2023.



8.7 years average length of service94% on permanent contracts

Contingent workforce

At 31 March 2023, SSE had a contingent labour force of 2,392 people, with 97% of these individuals working in the UK and 3% in Ireland. These are workers who are not directly employed by the company but carry out work using SSE's IT systems and/or on SSE premises as consultants, temporary agency workers and contractors.



Supply chain workforce

Over 2022/23, SSE spent around £5bn* through its supply chain and it has around 9,000 suppliers. The nature of SSE's business means that it is involved in several large infrastructure projects as well as operations at different stages during a given year – from preplanning and design, to development, planning, construction, and operation.

This means that the type and volume of goods and services SSE purchases is highly diverse, for example from office cleaning and security to on-site civils works, offshore wind turbines, across a wide spectrum of annual spend. Due to the nature of SSE's operations, the number of workers within its supply chain will also vary substantially throughout the year.

Although it is not possible to directly monitor worker numbers throughout its supply chain, SSE works with PwC every year to better understand the value it contributes to the UK and Irish economies, including through its supply chain activities. In 2022/23, the analysis showed that SSE's activities supported a total of 42,370 jobs across the UK and Ireland. The full report can be found on **sse.com/sustainability**.



*This includes SSE's procurement activities for Joint Venture projects, which may not be representative of SSE's equity share in the Joint Venture.



For more information on SSE's workforce see the Sustainability Report 2023 and accompanying data tables on **sse.com/sustainability**.



Supply chain overview

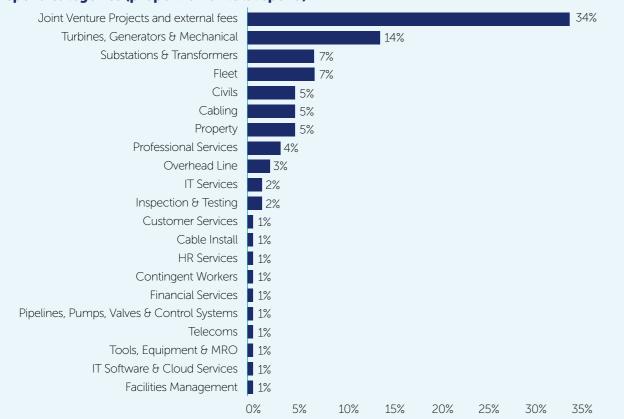
SSE's supply chain enables it to deliver its business strategy, create value and deliver economic growth. It therefore aims to work collaboratively with its supply chain, ensuring all activity is delivered sustainably, and that its standards and values are supported and upheld by its suppliers and contractors. With around 9,000 suppliers and an £18bn investment program in the five years to March 2027, collaborating with supply chain partners is central to achieving SSE's 2030 Goals and has been a key focus over 2022/23.

Over 2022/23, SSE spent around £5bn with its suppliers. This includes SSE's procurement activities for Joint Venture projects, which may not be representative of SSE's equity share in the Joint Venture. Approximately 73% of this spend relates to SSE's infrastructure and assets, particularly the construction of new assets and the operation and maintenance of existing assets and infrastructure.

personal development, and providing reliable transport and safe working environments, including the purchase of PPE. SSE also buys services from suppliers such as IT and telecoms services to support SSE's digital strategy, construction services, and repair and maintenance services.

With SSE's enhanced focus on delivering the infrastructure needed for net zero, specifically renewable energy generation and flexible electricity networks, it continues to invest in the maintenance and repair of existing assets, while focusing on new and improved infrastructure and technologies. Joint Venture projects and external fees account for 34% of SSE's tier 1 supplier spend.

Goods purchased include wind turbines, transmission towers, materials and components for assets and cable. Around 15.7% of spend is attributed to supporting employees to ensure they have the right tools for their job, opportunities for upskilling and



SSE's tier one supplier location data is based on the billing addresses provided to SSE by suppliers, and suppliers may operate in countries outside of their head office or billing address. This poses a challenge for mapping supplier spend by country. SSE is working to improve the quality of its supply chain data by upgrading IT systems, including its sourcing system, and is working with third party risk management companies to understand and verify supplier data. Based on the billing addresses provided to SSE by suppliers in 2022/23, 64% of SSE's tier one supplier spend is attributed to the UK, 8% in Sweden, 6% Netherlands, 5% Norway, 4% Belgium, 4% France, 3% Ireland, 3% Switzerland, 2% Germany and 0.3% in the US and the rest in other countries.

Tier 1 spend categories (proportion of total spend)



Governance

Board

The SSE plc Board of Directors has overall responsibility for SSE's approach to protecting human rights and mitigating the risk of modern slavery. It is provided with an annual update of activities undertaken when it approves SSE's Human Rights and Modern Slavery Statement. The Board reviews and approves, annually, the Group Human Rights Policy.

Group Executive Committee

The Group Executive Committee receives a regular update on activities relating to human rights risk mitigation. It approves SSE's Human Rights and Modern Slavery Statement, receives a full annual update of activity, and provides feedback for planned future activity. The Group Executive Committee comprises SSE's Chief Executive, Finance Director, Group Energy and Commercial Director, MD of Renewables, MD of Transmission, MD of Distribution, General Counsel and Company Secretary. SSE's Director of HR and Director of Corporate Affairs and Strategy also attend all meetings.

Risk Committee

SSE's Human Rights Steering Group reports to the Group Risk Committee. The Group Risk Committee is responsible for managing the processes in place to assess and monitor the Group Principal Risks and provides oversight of Business Unit risks, including human rights. The Group Risk Committee is chaired by SSE's Finance Director, and members include SSE's CEO, Chief Commercial Officer, Company Secretary, General Counsel, Chief Sustainability Officer and Director of Group Risk and Audit.

Human Rights Steering Group

SSE's Human Rights Steering Group is responsible for the production of the annual Human Rights and Modern Slavery Statement, and the action plans that fall underneath. It meets guarterly and is chaired by SSE's Chief Sustainability Officer, with membership including SSE's Chief Procurement Officer, the Director of SHE, the Head of Large Capital Projects Quality, and the Head of Learning and Talent.





Policies and standards

SSE's framework of Group policies provide the values base from which SSE's approach to ethical business and employment practices, and specifically human rights, is governed. The SSE plc Board and Group Executive Committee are responsible for the oversight of SSE's Group Polices including the approval of any changes to the policies. Policies are reviewed and approved annually by the Board. The Group Executive Committee supports the relevant policy owners and makes sure that the policy is adhered to through awareness, training, and monitoring of policy implementation. Incidents and breaches are reviewed and where appropriate opportunities for improvement are actioned.

Key policies and standards relating to SSE's approach to mitigate the risk of human rights abuses and modern slavery include:

- Doing the right thing: SSE's guide to good business ethics sets out the behaviours and principles of behaviour at SSE.
- Group Human Rights Policy: describes the company's approach to being responsible to its employees and people employed in its supply chain.
- Group Whistleblowing Policy: supports employees to speak up and report any wrongdoing.
- Group Safety and Health Policy: outlines SSE's commitment to the prevention of injury and ill health associated with its activities.
- Group Employment Policy: underpins SSE's commitment to being a responsible employer.
- Group Corruption and Financial Crime Prevention Policy: summarises the Company's commitment to financial integrity and ethical behaviour.
- Sustainable Procurement Code and accompanying Supplier Guidance document: describes the approach SSE takes to managing human rights and modern slavery in its supply chain and sets out its expectations of its supply chain partners.
- Group Large Capital Project Policy: sets out the group approach to Large Capital Project delivery and assurance processes • supporting the Group and Business Units governance model.

The policies are available publicly on SSE's website and are widely available to all employees, see **sse.com/sustainability/policies-and**assurances for more detail. Implementation of their key messages is supported by the employee guide, dedicated training, and communications.

Consideration within the Group Principal Risks

SSE's Group Principal Risks outline the key risks the company must manage and mitigate to meet its strategic objectives. Human rights and modern slavery are considered within the Group Principal Risks, which are reviewed on an annual basis by the SSE plc Board. It is considered directly within the 'Large Capital Projects Management' risk, and indirectly within the 'People and Culture', 'Safety and the Environment' and 'Political and Regulatory Change' risks. See the 2023 SSE Group Risk Report on sse.com for more detail.

Collaboration and partnerships

The global nature of the energy industry means that collaboration is a fundamental element of preventing human rights abuses and modern slavery within its large and complex supply chain. Collaboration helps SSE stay up to date with the latest human rights and modern slavery risks facing its sector and the geographies in which it operates and focuses on sharing learnings, approaches, and increasing engagement across supply chains.

Industry collaboration through the Utilities Against Slavery

SSE was one of the first companies to join Utilities Against Slavery (UAS) which was set up in May 2020 by Slave Free Alliance to drive forward collaborative action across the sector, and in 2023 it became a member of the Steering Group. Since launch, Utilities Against Slavery has met every six weeks and currently consists of around 25 utility companies from across the UK, with an objective to establish a common, consistent, and robust approach to mitigating the risk of modern slavery within the utilities sector.

Sharing knowledge through industry working groups

Over 2022/23, SSE joined two further modern slavery working groups, Scotland Against Modern Slavery (SAMS), and the Supply Chain Sustainability School's modern slavery working group. SAMS brings together the Scottish Government with over 56 business, charities, and NGOs, with the core aims of raising awareness of modern slavery, supporting survivors into good work, and protecting vulnerable communities from exploitation. SSE attends regular meetings which provide members with a better understanding of the specific issues taking place in and enables members to share learnings and approaches. For more information about SAMS see scotlandagainstmodernslavery.co.uk.

In late 2020/21, SSE became a partner of the Supply Chain Sustainability School (SCSS), a subsidiary of sustainable procurement consultancy, Action Sustainability, and over 2022/23 joined it's Modern Slavery Working Group. Through SCSS, SSE and its suppliers can access a range of guidance, resources and Continuing Professional Development (CPD) accredited training materials, of which includes modern slavery content. Over 2022/23 SSE used SCSS human rights and modern slavery resources to support the upskilling of its project teams as part of embedding sustainability into its Large Capital Project governance process.

Engaging SSE's supply chain through the Powering Net Zero Pact

The Powering Net Zero Pact is a flagship collaborative initiative created by SSE with 10 key founding partners. Over 2022/23, the

Key updates over 2022/23:

SSE joined the Utilities Against Slavery Steering Group

SSE joined the Scotland Against Slavery working group

SSE joined the Supply Chain Sustainability School working group on Modern Slavery



Pact has grown to 20 member companies and brings together different companies across all tiers of the power sector, identifying five key topics for collaboration to a fair and just transition to net zero. The Pact members have operations across more than 120 countries, combined turnover of more than £75bn, over 350,000 employees, and more than 170,000 suppliers.

Over 2022/23, the Pact established working groups for the five topics of collaboration, one of which is focused on developing a targeted modern slavery and human rights abuse risk-based approach across global supply chains within the context of the commitment to 'quarantee fair work and sustainable jobs'.

In May 2023, the Pact released its first annual report of progress. which details the activity of the five working groups, their agreed priorities and what the joint deliverables are for the first two years. This report, alongside more information on the Pact, can be found at **sse.com/pnzp**.

2021-2023 Modern **Slavery Action Plan**

In April 2021 SSE launched its Modern Slavery Action Plan (2021-2023) following a gap analysis carried out by human rights experts Stronger Together. Pages 15-20 report progress made against that action plan.

SSE's Modern Slavery Action Plan key focus areas:

- 1. Tier one and beyond: identifying and mitigating risk (pages 15-16) Mapping and risk assessment of tier 1 suppliers and beyond by identifying and addressing risk in priority supply chains, followed by mitigation and remediation where required.
- 2. Due Diligence (pages 17-18) Ensuring SSE has the right systems to drive robust due diligence.
- 3. Messaging and Communications (page 19) Embedding the human rights and modern slavery agenda within internal and external communications to demonstrate the importance of this issue to employees and other stakeholders.
- 4. Awareness and Education (page 19)

Raising awareness amongst all direct and indirect employees and delivering training to ensure those who require it understand how to spot, report, and remedy modern slavery.

5. Response and Doing the Right Thing (page 20)

Formulating an effective response and remedy to instances of non-compliance or reported issues.

Learnings from this action plan helped form SSE's Human Rights Strategy and Action plan to cover the next period: 2023-2026, outlined on page 21.



Tier one and beyond: identifying and mitigating risk

SSE seeks to understand the most salient potential human rights and modern slavery risks in its business activities and works with its partners and suppliers continuously to identify and prevent occurrences.

While there is low human rights risk in its direct operations due to the maturity of the legal protections in the UK and Ireland, SSE seeks to be diligent to the potential of illegal activity that threatens human rights. SSE also understands that risk may be higher within its supply chain, where it has less direct visibility of standards and controls.

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Key updates over 2022/23:

SSE Renewables appointed Slave Free Alliance to undertake a deep dive of due diligence with a focus on seagoing vessels

SSE Enterprise implemented the actions that resulted from its Littleton solar project

SSE improved its desk-based risk tier 1 supplier risk assessment

SSE refreshed its Large Capital Projects sustainability criteria to incorporate feedback and learning, of which modern slavery forms a key part

The salient human rights and modern slavery risks SSE is particularly focused on are:

Working people on construction sites and vessels: Low skilled, low paid workers who may be recruited through a third party and from overseas, including from countries with a high risk of human rights violations and modern slavery, and may therefore be vulnerable to exploitation.

2. Working people within facilities management services: This includes services such as catering, cleaning, security, and transport, where working people may be recruited through third-party agencies for contingent workers, with less transparency of working conditions and human rights protections.

3. Working people in the supply chains of major components SSE procures: the manufacturers of turbines, transformers, substation components, steel, and electrical components depend upon the procurement of raw materials sourced from high-risk countries and are in high-risk industries.

Working people in the supply chains of renewable technologies: there is a risk that, key materials, including polysilicon, lithium and cobalt are mined and processed in places without strong legal protections for indigenous or working people. An example of this is solar and battery, as raw materials for these can be sourced from countries deemed high risk for modern slavery.

5. Supply chain workers in countries with less robust legal protections: These workers are vulnerable to exploitation, for example, in places where the use of recruitment fees continues to be legal.

Desk-based risk assessment of tier 1 expenditure

SSE performed its annual desk-based human rights and modern slavery risk assessment, mapping modern slavery risk to SSE's tier one procurement expenditure. The risk is categorised according to industry and country-of-origin. Country-of-origin is determined by the location of the billing address provided to SSE, further location data reconciliation, or the company's location as recorded on the Companies House database. SSE recognises

that determining an accurate country of origin is imperfect and has continued to improve processes over 2022/23 to increase accuracy. This assessment of risk is then based on the Global Slavery Index, SIC (standard industry codes) category codes, and a detailed rating, including five risk levels from very low to very high. In addition, 10% of spend previously could not be mapped by location due to missing data sources, these have now been resolved and included in the 2022/23 risk assessment. The 2022/23 assessment mapped £5bn* of expenditure and showed the split between the below risk categories:

Very low risk	23%
Low risk	42%
Medium risk	35%
High and very high risk	0.5%

This process forms part of a wider extensive annual sustainability risk assessment, designed to measure risk in the supply chain against a range of important sustainability criteria. The findings inform supplier engagement, influence risk based tender criteria, and improve performance management of the supply chain.

Undertaking risk assessments for potential high-risk activities

SSE works closely with two external human rights specialists, Stronger Together and Slave Free Alliance, to support its understanding of human rights risk in business areas it has identified as being higher risk. The key developments over 2022/23 include:

- A deep dive supply chain assessment was completed for Dogger Bank windfarm by Stronger Together
- Slave Free Alliance undertook a gap analysis of SSE Renewables due diligence approach to marine vessels.
- Slave Free Alliance completed its deep-dive assessment for SSE's Littleton Solar project
- Slave Free Alliance undertook a desk top risk review of SSE Airtricity's key energy services suppliers to identify risk gaps in the business and also to better understand the Supply Chain.

The outcome of the reviews reassured SSE that its suppliers had a high standard of practices and processes in place and helped SSE improve its own due diligence procedures to reduce and manage human rights risk in the future.

Integrating risk mitigation in supplier requirements

At the core of SSE's sustainable procurement strategy is its Sustainable Procurement Code and accompanying Supplier Guidance. These documents are publicly available on sse. com/sustainability. The Code sets out SSE's expectations of the companies that supply SSE with goods and services. The Code has been designed to feed into SSE's own sustainability approach, with clear alignment to the UN's SDGs which are most material to SSE. See SSE's Sustainability Report 2023, available at sse.com/sustainability, for information on how it implements the Code.

As well as minimum standards, the Sustainable Procurement Code outlines the role of suppliers in delivering common sustainability goals, from paying a real Living Wage to implementing the highest safety standards on sites. It includes a specific section on modern slavery and human rights, outlining requirements on suppliers. Suppliers, contractors, and those working on their behalf are instructed to report any specific

Understanding the risks of new ventures into Solar

Over the last two years, SSE has explored new ventures into solar and battery and is in the early stages of developing its first-ever large-scale solar project at Littleton Farm. SSE is aware of the human rights risks in the solar supply chain and therefore, sought expertise from Slave Free Alliance (SFA), to identify and mitigate potential risks.

SFA carried out a deep dive assessment of the prospective tier one suppliers for the Littleton project, in advance of awarding contracts, conducted an industry deep-dive and supplier desk-top review and interviewed the supplier shortlist, which was repeated for the suppliers manufacturers following their appointment. The report developed from this included seven recommendations, and SSE is working to implement these as part of its Human Rights and Modern Slavery Action Plan 2023-26 (see page 21 for details).

To ensure good governance and transparency, the risks and mitigations processes developed by the Littleton team have been raised to SSE's Board, and were presented at the Human Rights Steering Group, the Group SHE Committee, and the Board-level SSHEAC.

potential violation of the Sustainable Procurement Code to sustainablesuppliers@sse.com.

In addition to adhering to the Code, all potential new suppliers are requested to sign-on to SSE's Sustainable Procurement Code when registering on our ERP and Source-to-Contract systems. For those suppliers who progress onto the Utilities Vendor Database (UVDB), a portal for suppliers in the utilities industry, questions relating to their approach to human rights and modern slavery risk within their own organisation and supply chain must be completed with documentation uploaded as appropriate. UVDB is operated by Achilles Information Limited, who also conduct independent audits of certain suppliers registered on the system against the information they have provided in the guestionnaire. SSE's pre-gualification guestions (PQQ) template includes robust guestions on modern slavery for potential suppliers which are consistent with the questions being asked by its peers in the utility sector, aligned via work undertaken with Utilities Against Slavery.

Embedding risk mitigation in SSE's large capital projects governance framework

Over 2022/23, SSE refreshed its Sustainability Assessment and Action Plan (SAAP), which is a tool and process for project teams to manage sustainability risk on projects, based on engagement and feedback from project teams. A key component of the SAAP is the identification and mitigation of human rights and modern slavery risk on the project site and in the supply chain. For more information on embedding sustainability into LCPs see SSE's Sustainability Report 2023 available at **sse.com/sustainability**.

Due diligence

Verification and vetting

SSE ensures that the right to work is evidenced for all workers in line with government requirements. SSE also sets the expectation that contractors and staffing agencies are subject to the same standards, assigning business managers with responsibility to ensure they are satisfied that the required verification and vetting of workers has taken place.

Collective bargaining and freedom of association

Everyone that works for SSE has the fundamental right to freedom of association, including the right to join a trade union. In 2022/23, 50.3% of SSE's total direct workforce were covered by collective bargaining agreements. The Joint Agreement, covering 49.9% of SSE employees, is the main collective bargained agreement for SSE employees. It is negotiated through the Joint Negotiating and Consultative Committee (the JNCC) which comprises SSE and its four recognised trade union partners: Unite, Unison, Prospect and the GMB.

Safeguarding

SSE is committed to safeguarding and promoting the welfare of all employees. The Company has a Safeguarding Policy in place to ensure the safety of all apprentices aged under 18 years old when working, learning, travelling and when in residential accommodation provided by SSE. Specific guidance is provided within the policy in relation to the protection and welfare of vulnerable young people.

Voluntary enhanced standards: the Living Wage and Living Hours

SSE believes that enhanced minimum standards set the tone for its employee culture. SSE has been a committed real Living Wage employer in the UK since 2013 and paid the Irish Living Wage since 2016. Checks are carried out by payroll every month to ensure that SSE remains compliant with its own voluntary commitment to paying the real Living Wage. Everyone working within SSE's supply chain that work regularly on SSE sites in the UK must also receive at least the real Living Wage rate. Whistleblowing channels exist for any supplier or contractor to contact SSE if they believe they should be receiving the Living Wage and are not.

SSE has completed its second year of being an accredited Living Hours employer, underlining its commitment to providing workers with secure, guaranteed working hours. The Living Hours initiative requires employers to commit to provide at least four weeks' notice for every shift, with guaranteed payment if shifts are cancelled within this notice period, provide a guaranteed minimum of 16 working hours every week (unless the worker requests otherwise), and a contract that accurately reflects hours worked.

As well as being Chair of the Living Wage Leadership Group in Scotland, SSE has been a member of the Living Hours Steering Group for four years, supporting the Living Wage Foundation to develop this important standard. Over 2022/23, SSE joined the

Key updates over 2022/23:

SSE joined the Living Wage Foundation's Steering Group on the Global Living Wage

SSE continued the roll out of its updated modern slavery and living wage contract clauses

SSE completed the third of its on-site modern slavery assessments with Stronger Together at Slough Multifuel

SSE is integrating human rights and modern slavery questions into regular Safety, Health, and Environment site audits

Living Wage Foundation's Steering Group on the Global Living Wage to gain a better understanding of the global agenda, as it seeks to expand its renewables operations internationally.

Contractual clauses

SSE includes two relevant clauses within its procurement contracts to help mitigate the risk of modern slavery and hold suppliers accountable for ensuring they are taking appropriate action. SSE's procurement department complete a checklist which ensures suppliers are properly registered and contracts feature the relevant clauses. Where evidence emerges of a supplier's non-compliance with its contractual obligations, SSE will invoke its rights under the contract to investigate and remedy non-compliance.

Modern Slavery Clause

SSE's Modern Slavery Clause has been included in all new goods, services and works contracts issued since 2016. This clause explicitly states that the contractor must ensure that no slavery or human trafficking takes place or has taken place within their own business and in any part of its supply chains and explicitly rules out the imposition of any financial burdens on workers, such as withholding wages or imposing recruitment fees, and requires that workers are informed of and have access to a means for reporting an actual or suspected instance or risk of slavery or human trafficking when work is being undertaken for SSE.

Living Wage Clause

SSE's Living Wage Clause has been included in all new services and works contracts issued since 2014. It requires the real Living Wage to be paid to employees throughout every tier of SSE's supply chain when they are providing services regularly on SSE sites or to SSE's customers on its behalf in the UK, including SSE's offshore wind projects.

On-site checks and audits

SSE has a large and evolving supply chain which supports the ongoing project portfolio. SSE is aware that construction is an industry that has a high potential risk of human rights violations and modern slavery. Therefore, it prioritises making sure all workers on site, whether hired directly by SSE or by a third party, have good labour standards and working conditions.

Over 2022/23, the final of four on-site supplier assessments, that started in 2021/22, was completed by Stronger Together.



The assessments checked working conditions and assessed procedures and policies, and were conducted by engaging with the Principal Contractors on site and speaking to site workers directly and privately. The reports from all assessments reassured SSE that its sites are at low risk for human rights abuses and modern slavery. Over 2022/23, SSE has been developing a question set for its Safety, Health, and Environment (SHE) auditors that will check signs of modern slavery on sites.

Messaging and Communication

Clear guidelines for business ethics

SSE's Doing the Right Thing guide to good business ethics supports the adoption of the right values, attitudes, and behaviours to contribute to an ethical business culture at SSE. The information within the guide applies to all SSE employees, as well as people employed by other organisations to work on SSE's behalf. It covers a wide range of topics, from human rights and modern slavery, to managing data and cyber security. Employees, suppliers, and contractors are expected to familiarise themselves with this guide and SSE's expectations for ethical business behaviour.

Human rights and modern slavery communications

A programme of broad communications was shared with SSE employees, to support their understanding of modern slavery. Knowing how to spot the signs of modern slavery and awareness of whistleblowing channels are hosted permanently on SSE's internal SafetyNet platform and are linked to in weekly health and safety email bulletins sent to all employees. In October 2022, SSE shared further communication during Anti-Slavery week, with a focus on reaching project teams on site. Modern slavery packs were developed and shared with 200 project team employees. These packs included toolbox talks, awareness articles, and poster and leaflets in multiple languages that could be used on site.

Education and Awareness

Ensuring training is accessible when required

SSE employees can access its modern slavery webinar, developed in partnership with the Supply Chain Sustainability School, and its Climate academy training, which includes a webinar on human rights impacts, on SSE's internal SharePoint at any time.

Building knowledge for those closest to SSE's supply chain

Over 2022/23, SSE's Learning and Talent team developed and rolled out bespoke training for Project Managers and Procurement teams with the Supply Chain Sustainability School (SCSS), to ensure those closest to its supply chain are aware of the risks and know how to spot the signs of human rights abuses and modern slavery in their roles. The training reached 60 SSEN Transmission Project Managers and 200 Procurement colleagues completed the training.

Engaging with suppliers to understand training gaps

As part of SSE's partnership with the Supply Chain Sustainability School (see page 13 for details), over 2022/23, 61 suppliers representing 14% of SSE's supply chain spend, completed 518 modern slavery resources to support them in mitigating modern slavery risk across their operations and supply chain.

Key updates over 2022/23:

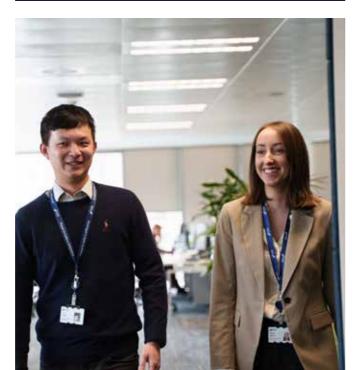
In October 2022, SSE drove awareness of how to spot the signs of modern slavery for project teams and on sites during Anti-Slavery week



Key updates over 2022/23:

60 SSEN Transmission project managers completed modern slavery awareness training

200 procurement professionals completed modern slavery awareness training



Response and doing the right thing

Reporting wrongdoing

Supporting employees to speak up against wrongdoing is a key element of SSE's approach to good business ethics and doing the right thing. Anyone who believes that an SSE employee, or anyone working on behalf of SSE, has engaged in wrongdoing should report the matter immediately. This can be done through an independent whistleblowing channel, called Safecall, as well as through SSE's internal channels. Details for how to report wrongdoing through all of these channels are made publicly available through the 'Doing the right thing' guide, with information on speaking up about human rights and modern slavery specifically detailed on page 24 of this guide. While internal channels are available in English only, Safecall is available in many languages, shown on safecall.co.uk/report.

The effectiveness of SSE's whistleblowing arrangements is reviewed twice yearly by the Group Executive Committee and the Board. In SSE's 2022 employee engagement survey 85% of employees said that they would report wrongdoing without worrying that it would have a negative impact on them (+6% compared to the Energy and Utilities norm and +3% compared to the UK norm). Over 2022/23, there were 50 reports of wrongdoing made through SSE's speak up channels, remaining consistent with 49 reports the previous year. A breakdown of these reports of suspected wrongdoing by category can be found on page 59 of SSE's Annual Report 2023. None of these incidents related to suspected instances of modern slavery or human rights abuses.

SSE's Modern Slavery Clause (see page 17) also includes a requirement that suppliers and contractors provide a channel for people to speak up if they suspect modern slavery or human rights abuses when working on behalf of SSE.

Formalising SSE's UK Human Rights Escalation Procedure

Over 2022/23 SSE developed and launched a formal UK Human Rights Escalation Procedure. The procedure clearly outlines how suspected human rights abuses should be alerted to SSE by direct or indirect employees throughout SSE's operations and supply chain, and how these should be escalated to relevant areas of the business and senior management. This includes clear lines of accountability for investigating and remediating if required.

Investigating wrongdoing and taking action

When people speak up against wrongdoing at SSE, it is always fully investigated, if possible, with appropriate action taken to prevent further wrongdoing. When speak up incidents are reported, either internally or externally, they are always treated in good faith and referred to SSE's Group Security and Investigations team or another relevant department for full investigation. During these investigations, interviews are undertaken, and evidence is collated. Final reports of the investigations are submitted either internally for consideration of disciplinary action, or externally to law enforcement. A breakdown of the outcomes of the investigations into reports of suspected wrongdoing made



Key updates over 2022/23:

SSE developed a UK Human Rights Escalation Procedure

over 2022/23 can be found on page 59 of the SSE's Annual Report 2023. SSE has a case-by-case approach to instances of non-compliance from suppliers, and the nature and severity will determine the corrective action taken. SSE strives to first engage with the supplier to gather information, offer support and collaborate to make improvements. However, where necessary SSE will issue warnings, and if required cease to continuing working with them.

After-care for those who speak up

SSE takes measures so that those that speak up feel confident they are doing the right thing and know there will not be negative repercussions. SSE's priority is to build trust with people who speak up and ensure they are treated fairly and with respect. SSE was one of the first major companies to implement an aftercare programme for those people that make contact through its speak up channels. This is designed to gain feedback and improve future processes to further support employees to speak up. In 2022/23, SSE issued 66 after-care surveys.



The next phase: SSE's Human Rights Strategy and Action plan 2023-2026

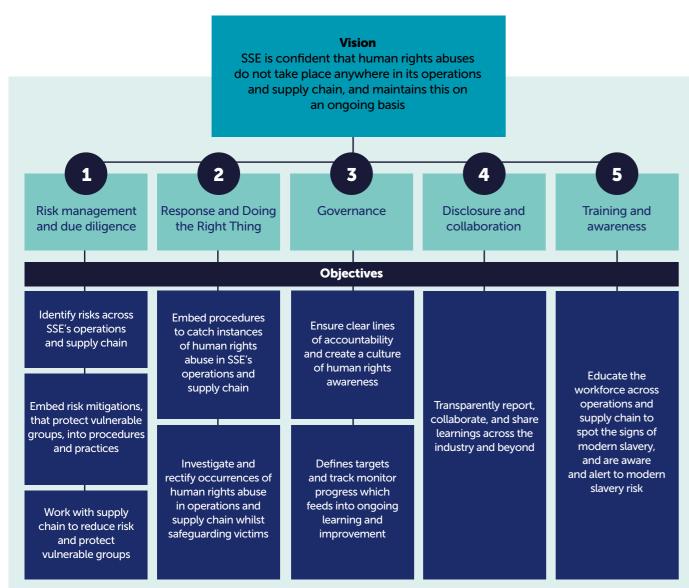
With its 2020-2023 Human Rights Action Plan coming to conclusion, a revised plan for the period 2023-26 has been approved in the context of an enduring Human Rights Strategy.

The 2023-2026 Action Plan incorporates learnings from the work undergone over 2021-2023, including on-site and deep dive assessments and gap analysis work carried out by third-party specialists Stronger Together and Slave Free Alliance. It also considers external benchmarks requirements, and the UN

Guiding Principles on Business and Human Rights.

SSE's human rights vision outlines its ultimate ambition: to be confident that human rights abuses, including modern slavery do not take place anywhere in its operations and supply chain, and that it is maintaining this on an ongoing basis.

Five pillars have been set to deliver against the vision, with key objectives outlined for each.





SSE's Human Rights Strategy

Businesses covered by the SSE Human Rights and Modern Slavery Statement 2023

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Goto-Fukue Ottshore Wind Power G.K. Japan 80.0 Kenewable Development				
	Goto-Fukue Ottshore Wind Power G.K.	Japan	80.0	Renewable Development

Company	Country of incorporation	2023 Holding %	Principal activity
Greater Gabbard Offshore Winds Limited	England and Wales	50.0	Power Generation
Green Wind Energy (Wexford) Limited	Ireland	100.0	Renewable Development
Griffin Wind Farm Limited	Scotland	100.0	Power Generation
Hadyard Hill Wind Farm Limited	Scotland	100.0	Dormant
lydro Electric Pension Scheme Trustees Limited	Scotland	100.0	Dormant
zu Islands Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
leadby Developments Limited	England and Wales	100.0	Dormant
eadby Generation Limited	England and Wales	100.0	Power Generation
eadby Wind Farm Limited	England and Wales	100.0	Power Generation
eanamore Wind Farm Limited	Ireland	100.0	Power Generation
imerick West Windfarm Limited	Ireland	100.0	Power Generation
ittleton Pastures Solar Limited	England and Wales	100.0	Power Generation
1arch Winds Limited	Ireland	100.0	Power Generation
1edway Power Limited	England and Wales	100.0	Power Generation
leentycat Limited	Ireland	100.0	Power Generation
filane Holdings Limited	Ireland	100.0	Dormant
1/inami-lzu Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
Aullananalt Wind Farm (ROI) Limited	Ireland	100.0	Power Generation
liigata Offshore Wind Power No.1 G.K.	Japan	80.0	Renewable Development
Dki Islands Offshore Wind Power G.K.	Japan	80.0	Renewable Development
Optimal Power Networks Limited	England and Wales	100.0	Construction of utility projects
latin Power Limited	Ireland	100.0	Dormant
ower from Waste Limited		100.0	
	England and Wales Ireland	100.0	Dormant Power Generation
lichfield Windfarm (ROI) Limited		100.0	
cottish and Southern Energy Power Distribution Limited	Scotland Scotland	100.0	Holding Company
cottish Hydro Electric Power Distribution plc		75.0	Power Distribution
cottish Hydro Electric Transmission plc	Scotland		Power Transmission
heskin South Renewables Power Designated Activity Company	Ireland	100.0	Renewable Development
istemas Energéticos Ábrego S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Ariel S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Boreas S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Carril S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Céfiro S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos del Sur S.A.U.	Spain	100.0	Renewable Development
istemas Energéticos Eolo S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Erbania 1 S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Erbania 2 S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Gregal S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Júpiter S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Ladera Negra, S.A. U.	Spain	100.0	Renewable Development
istemas Energéticos Loma del Reposo S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Marte S.L. U.	Spain	100.0	Renewable Development
istemas Energéticos Mercurio S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Neptuno S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Oberón S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Plutón S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Tablero Tabordo, S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Terral S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Titán S.L.U.	Spain	100.0	Renewable Development
istemas Energéticos Tomillo S.A. U.	Spain	100.0	Renewable Development
istemas Energéticos Urano S.L. U.	Spain	100.0	Renewable Development
lough Domestic Electricity Limited	England and Wales	100.0	Dormant
lough Electricity Contracts Limited	England and Wales	100.0	Electricity Contracting
lough Energy Supplies Limited	England and Wales	100.0	Dormant
	England and Wales	100.0	Power Generation
ilough Heat & Power Limited			

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		-						Stock Holding
	-	England and Wales	100.0	Holding Company	SSE Sunflower Offshore Wind Holdco B.V.	Netherlands	100.0	Renewable Development
		-						Renewable Development

Company	Country of incorporation	2023 Holding %	Principal activity
SSE Sunflower Offshore Wind Limited Partner 2 B.V.	Netherlands	100.0	Renewable Development
SSE Sunflower Offshore Wind Limited Partner 3 B.V.	Netherlands	100.0	Renewable Development
SSE Thermal Energy Holdings Limited	England and Wales	100.0	Holding Company
SSE Thermal Energy Operations Limited	England and Wales	100.0	Power Generation
SSE Thermal Generation (Scotland) Limited	Scotland	100.0	Power Generation
SSE Thermal Generation Holdings Limited	England and Wales	100.0	Holding Company
SSE Toddleburn Limited	Scotland	100.0	Power Generation
SSE Trading Limited	England and Wales	100.0	Energy Trading
SSE Trustees Limited	England and Wales	100.0	Dormant
SSE Tulip Offshore Wind Holdco B.V.	Netherlands	100.0	Renewable Development
SSE Tulip Offshore Wind Limited Partner 1 B.V.	Netherlands	100.0	Renewable Development
SSE Tulip Offshore Wind Limited Partner 2 B.V.	Netherlands	100.0	Renewable Development
SSE Tulip Offshore Wind Limited Partner 3 B.V.	Netherlands	100.0	Renewable Development
SSE Utility Services Limited	England and Wales	-	Dormant
SSE Utility Solutions Limited	England and Wales	100.0	Utility Services
SSE Venture Capital Limited	Scotland	100.0	Investment Holding
SSE Viking Limited	England and Wales	100.0	Renewable Development
SSE(SE) Quest Trustee Limited	England and Wales	100.0	Dormant
SSEN Distribution Limited	Scotland	100.0	Holding Company
SSEPG (Operations) Limited	England and Wales	100.0	Power Generation
Strathy Wind Farm Limited	Scotland	100.0	Power Generation
Stronelairg Wind Farm Limited	Scotland	50.1	Power Generation
Sure Partners Limited	Ireland	100.0	Renewable Development
Tealing Solar Park Limited	England and Wales	100.0	Power Generation
TESGL Limited	England and Wales	100.0	Building Energy Management
The Energy Solutions Group Bidco Limited	England and Wales	100.0	Dormant
The Energy Solutions Group Midco Limited	England and Wales	100.0	Dormant
The Energy Solutions Group Topco Limited	England and Wales	100.0	Dormant
Tournafulla Windfarm (ROI) Limited	Ireland	100.0	Power Generation
Viking Energy (Scottish Partnership)	Scotland	100.0	Renewable Development
Viking Energy Wind Farm LLP	Scotland	100.0	Renewable Development
Wakayama-West Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
Wakayama-West Offshore Wind Power No.2 G.K.	Japan	80.0	Renewable Development