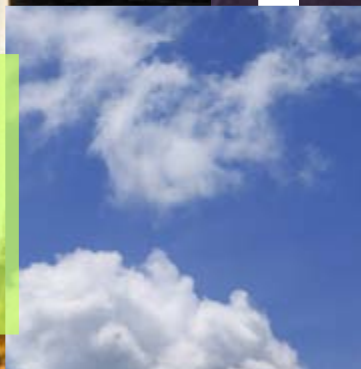
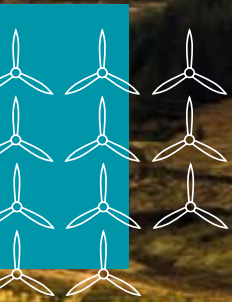




Human Rights Report and Modern Slavery Statement 2024

September 2024





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1. Introduction

1.1. 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 14,000 people and is real Living Wage and Fair Tax Mark accredited.

1.2. About this report

This is SSE's Human Rights Report and Modern Slavery Statement 2024, 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 2024. 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 Report and Modern Slavery Statement can be found in section 5.6.

This statement sets out the steps taken by SSE between 1 April 2023 and 31 March 2024 to assess, mitigate, prevent and

remedy human rights abuses and modern slavery within its business and supply chains. It was approved by the SSE plc Board of Directors on 29th August 2024.

Since publishing its first Modern Slavery Statement in 2016, SSE has continuously enhanced its approach and transparency related to human rights and modern slavery. SSE aims to adhere to international best practice as well as meeting emerging statutory requirements and evolving stakeholder expectations.

SSE welcomes feedback on the content of this report. Please get in touch by emailing sustainability@sse.com

Barry O'Regan
Chief Financial Officer, SSE plc

Defining human rights and modern slavery

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.

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.

1.3. SSE's commitment to internationally-recognised human rights standards

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 supports and is fully committed to the:

- UN Guiding Principles (UNGPs) on Business and Human Rights
- 10 Principles underpinning the UN Global Compact (UNGC)
- International Bill of Human Rights
- International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work fundamental rights (freedom of association and the effective recognition of the right to collective bargaining; the elimination of forced or compulsory labour; the effective abolition of child labour; the elimination of discrimination in respect of employment and occupation, and a safe and healthy working environment).
- OECD Guidelines for Responsible Mineral Supply Chains
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

2. SSE's business and supply chain

2.1. SSE's structure and business model



2.2. Understanding SSE's workforce

SSE's business activities and workforce are predominantly located in the UK and Ireland. However, SSE's ambitions for renewable energy development 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.

SSE's direct workforce at 31 March 2024:

- 13,891 employees working across offices, depots, operational sites and construction sites
- 92% of employees were based in the UK and 7% were based in Ireland
- 131 employees outside of the UK and Ireland
- 95% of employees on permanent contracts.

More on SSE's progress on workforce diversity and inclusion, including its first ethnicity pay gap figures, can be found in its Inclusion and Diversity Report 2024 at [sse.com](https://www.sse.com).

SSE's contingent workforce at 31 March 2024, which is additional to SSE's in-direct workforce:

- 2,364 people carry out work using SSE's IT systems and/or on SSE premises as consultants, temporary agency workers, and contractors
- 91% are working in the UK and 9% in Ireland.



2.3. Supply chain overview



SSE's direct supply chain spend

SSE works collaboratively with its supply chain, working towards positive social and environmental outcomes underpinned by standards and values upheld by all its suppliers and contractors.

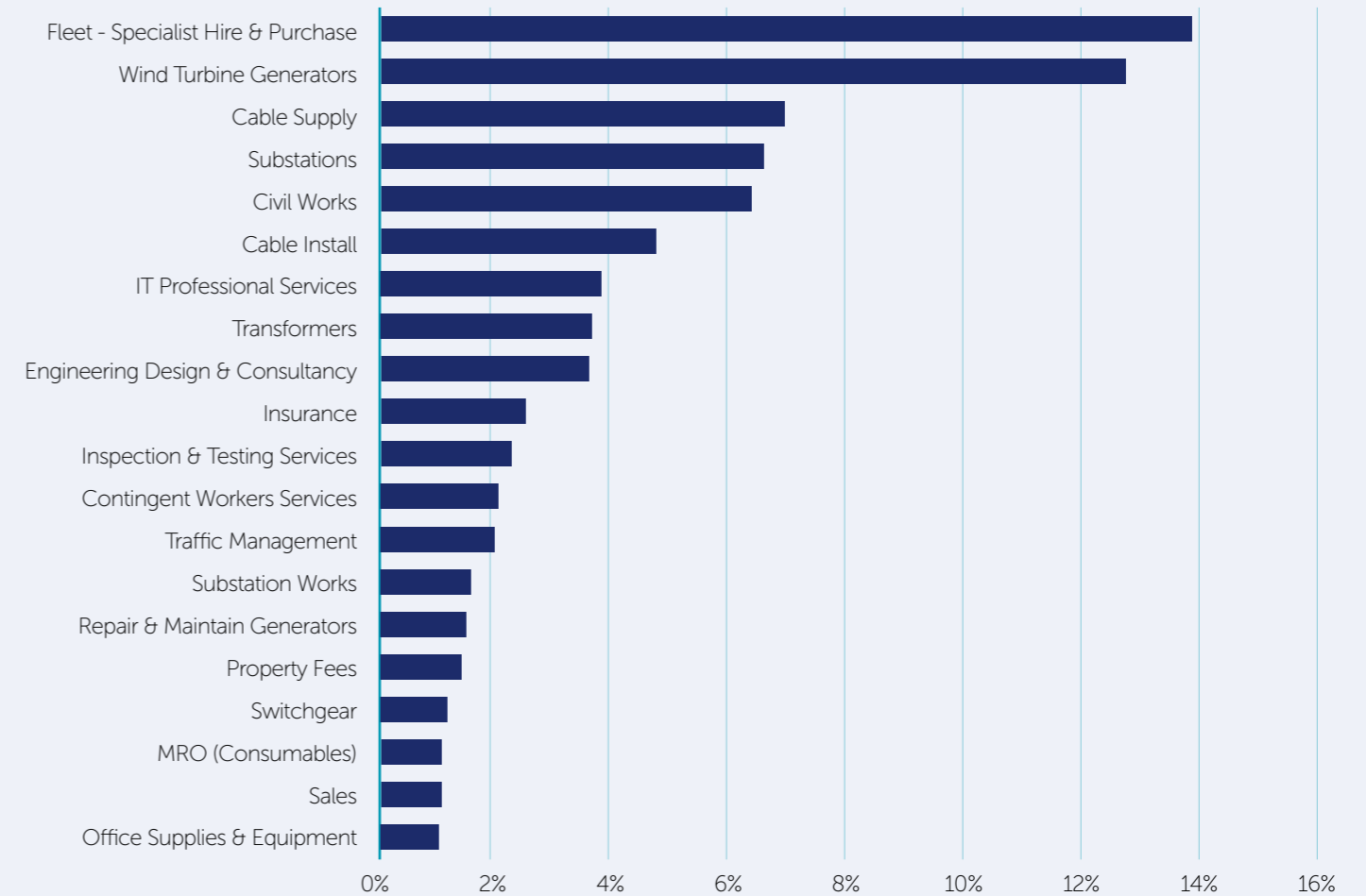
SSE's Net Zero Acceleration Programme Plus investment plan requires increased supply chain activity. In 2023/24, SSE spent £5.5bn with its supply chain partners, up from £3.8bn the previous year.

SSE's suppliers include large global

organisations as well as small and medium sized and local enterprises, and it aims to support sustainable domestic employment and local supply chains. SSE's Sustainability Report 2024 details the economic impact of jobs supported, taxes paid, and community investment.

The nature of SSE's business means that the type and volume of goods and services SSE purchases is highly diverse, ranging from offshore wind turbines, cabling and on-site civils works, to office cleaning and security services. Graph 1 outlines SSE's material categories of expenditure over 2023/24.

Graph 1 - Material categories of expenditure 2023/24



Enhancing supply chain data

Over 2023/24, SSE continued to develop supplier data accuracy across industry categorisation and location. More on how SSE is addressing challenges related to supplier location data is provided in section 5.3.

Salient human rights risks are predominantly found in SSE's supply chain activities, beyond tier one, and increasing transparency in tiers two and three is a key focus. Work to date on this includes mapping high-risk business areas such as large scale solar through deep-dive risk assessments up to tier seven (see pages 11 and 12).

Supply chain workforce

Due to the nature of SSE's operations, the number of workers within its supply chain will vary substantially throughout the year.

Although it is not possible to directly monitor supply chain worker numbers, 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 2023/24, the analysis showed that SSE's activities supported a total of 56,500 full time equivalent (FTE) jobs across the UK and Ireland including 36,170 FTE jobs through indirect contribution generated by supply chain spend. The full report can be found on [sse.com/sustainability](https://www.sse.com/sustainability).



1. Categories of expenditure based on Standard Industrial Classification (SIC) codes.
2. 2023/24 includes all joint venture expenditure that SSE is responsible for.

3. Overview of SSE's Human Rights Strategy

Human rights risks cover a wide range of adverse impacts to rights holders, including but not limited to labour rights, land rights, and health and education rights as examples. Those with a high-risk of being impacted by these risks, include minorities, indigenous people, children, and vulnerable consumers. For more information on the salient human rights risks impacting the energy sector and its value chains see section 5.2.

SSE's activity relevant to human rights risks include the inclusion and diversity strategy; the community investment commitment; effective and transparent stakeholder engagement; the company's just transition and consumer vulnerability strategies, and its commitment to paying fair tax. See sse.com for more information.

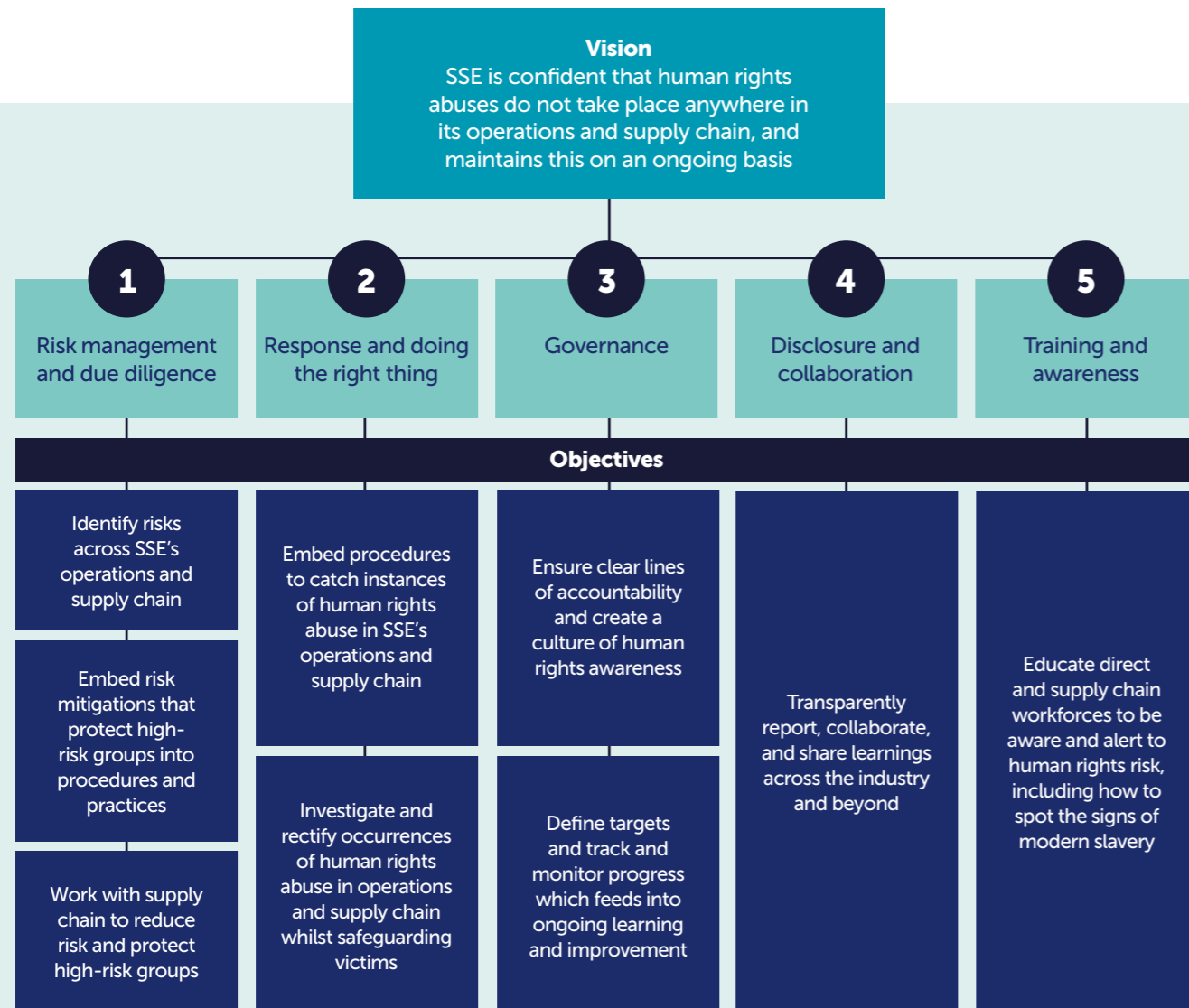
SSE's Human Rights Strategy ('the Strategy') has been

developed in response to the business's most salient human rights risks not addressed by this existing activity.

SSE's policies and procedures seek to address, mitigate, monitor, and communicate on risks and support a range of at-risk stakeholders across its value chain.

The Strategy outlines SSE's human rights vision, with five pillars with corresponding objectives. The ambitious vision has been set to accelerate effort, acknowledging the everchanging nature of human rights risk management and that ongoing management and improvement will always be required, no matter how much progress is achieved.

The objectives within each pillar ensure SSE is effectively managing human rights risks, with robust standards, policies, and procedures.



3.1. Aligning SSE's Strategy to international frameworks

Over 2023/24, SSE undertook an analysis of its Strategy against the UNGPs and the OECD Guidance for Multinational Enterprises on Responsible Business Conduct. The purpose was to ensure SSE met its commitments in its Human Rights Policy and that management measures align to leading practice. This led to SSE further developing its approach to remediation over 2023/24 (see section 4.3).

Each pillar of SSE's Action Plan has been aligned to the OECD six-step due diligence process, outlined below, and alignment is signposted across section 4 of this report.



4. Delivering the Strategy: Action Plan 2023-2026 progress

SSE delivers its Strategy through its Action Plan 2023-2026 ('the Action Plan'). The Action Plan incorporates learnings from work between 2021 and 2023, including on-site and deep dive assessments and gap analysis work carried out by Stronger Together and Slave Free Alliance (SFA). It considers external benchmarks requirements and the UNGPs.

4.1. Action Plan progress overview

The focus of SSE's Action Plan over 2023/24 was to address the most material areas of risk in a way that aligns with best practice frameworks (section 3.1). Key actions and activities over 2023/24 for each pillar of the Strategy can be found throughout this section of the report.

Progress in 2023/24 included:

<p>Aligning SSE's Strategy to the UN Guiding Principles and the OECD Guidelines for Multinationals (section 3.1)</p>	<p>Developing human rights KPIs (section 4.4)</p>
<p>SSE Renewables deep dive risk assessment (section 4.2)</p>	<p>Developing SSE's approach to remediation (section 4.3)</p>



4.2. Pillar 1: Risk management and due diligence



Understanding salient human rights risks

In line with the UNGPs, SSE first seeks to understand its most salient human rights risks in order to prioritise due diligence using a risk-based approach. It works continuously with partners and suppliers to identify and prevent occurrences, and to monitor changes in the risk environment including those related to conflict, climate, and natural disasters. Despite mature legal protections for workers in the UK and Ireland, SSE continually monitors risks in its direct operations and remains alert to the potential of illegal activity that threatens human rights. SSE understands that risk may be higher within its supply chain, where it has less direct visibility of standards and controls.

Salient human rights and modern slavery risks prioritised by SSE:

- Workers within facilities management services:** services such as catering, cleaning, security, and transport have increased risk of human rights abuses as these workers may be recruited through third-party companies.
- Workers on construction sites and vessels:** these workers have increased risk of human rights abuses. Those most at risk of exploitation are low paid workers, migrants, those recruited through third-party companies (which have limited transparency around recruitment standards and reduced due diligence), and those from overseas especially countries with a high-risk of human rights violations.
- Rights holders in or linked to the supply chains of high-risk industries including those in countries with less robust legal protections:** energy industry supply chains are underpinned by minerals and metals such as copper, iron ore, and bauxite, often sourced from countries with increased risk of human rights abuses. Workers face risks such as forced labour, unsafe working conditions, and excessive working hours, while communities face risks related to land and property rights.

Consideration within the Group Principal Risks

SSE's Group Principal Risks are 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 SSE plc Group Risk Report 2024 on sse.com for more detail.

Identifying and prioritising risk through risk assessments

Risk assessing supply chain expenditure

Understanding where products come from is an important aspect of understanding the nature of the human rights risk that might exist for both working people and communities. However, the ability to determine exactly where components and materials are coming from, beyond the first tier of SSE's supply chain, is highly complex. While locational data associated with the payments to SSE's Tier 1 suppliers is well understood (see section 5.3), it is likely that human rights risk will exist deep into the supply chain.

Recent and upcoming work to deepen insight into SSE's supply chain includes:

- Partnering with EcoVadis (a global sustainability assessment platform) in 2023 to access independently assessed supplier data and analysis. Suppliers on EcoVadis platform have been evaluated on factors such as adherence to globally recognised human rights standards, as well as their processes to ensure responsible sourcing. At 31 March 2024, 51% of SSE suppliers by spend had been evaluated or were undergoing an evaluation.
- Engaging with SSE's top 1,000 suppliers by spend to increase this percentage, with a target of achieving 75% of SSE's suppliers by spend submitting data to EcoVadis by 2025.
- Implementing business-specific risk assessments to help prioritise due diligence efforts and identify supply chains requiring additional due diligence beyond tier one. This started in 2023/24 with SSE Renewables, more information can be found on pages 11 and 12.

SSE Renewables deep dive technology risk assessment

In 2023/24, SSE Renewables conducted its first deep dive strategic human rights risk assessment, working with independent human rights specialists, Slave Free Alliance and twentyfifty.

The assessment was conducted in line with the UNGPs and considered a range of human rights and environmental risks across all the jurisdictions SSE Renewables is active in for its five renewable technologies:

- Onshore wind
- Offshore wind
- Large scale solar development
- Battery energy and storage systems (BESS)
- Hydro

Potential adverse impacts were considered across all stages of the supply chain, from the extraction of minerals and processing of metals to the construction and operation of assets. Impacts were scored based on saliency to the rights holder, considering severity and likelihood. SSE Renewables' relationship to the risk was also considered, notably its causation, contribution or linkage.

As transparency remains a challenge in upstream operations, risk was assessed using gross likelihood of estimated sourcing countries. Risks pertinent to the operation and construction of SSE Renewables' assets were based on risks associated with the jurisdictions of those assets, which are currently based in Europe. Risks were investigated using a variety of resources including UN and NGO reporting, supplemented by human rights indicators (e.g. the Corruption Perception Index, Global Slavery Index).

The assessment has enabled SSE Renewables to prioritise its most salient risks, considering both the risk to rights holders and thereafter, materiality.

Salient risks were identified in the following areas/activities for prioritised enhanced due diligence. These risks identified mirror those experienced by the wider energy sector (see section 5.2).

- **Solar photovoltaic (PV) supply chains:** the mining and processing of quartz and polysilicon, and the manufacturing of solar panels
- **Lithium BESS:** the mining and processing of lithium, and the manufacturing of BESS energy storage system-related materials
- **Mineral supply chains in wind and hydro:** the mining and processing of minerals including copper, bauxite, iron ore, and rare earths
- **Project construction sites:** across renewable energy technologies including increased use of sub-contractors and third-party recruitment agencies
- **Offshore wind construction:** the use of international marine vessels and increased use of sub-contractors and third-party recruitment agencies

The assessment identified key at-risk rights holders that have a higher likelihood of being impacted by human rights violations, and therefore require additional due diligence and protections in place. These people include ethnic and religious minorities (for example those with an increased risk of exploitation within Solar PV and BESS supply chains), indigenous peoples (for example, those at an increased risk of being impacted by extraction activities), and children (who can be at an increased risk of being exploited by mining supply chains). Other at-risk rights holders include migrant workers and low-paid workers.

The potential risks to rights holders across operations and the supply chain include violations of labour rights, fair pay and employment charges (such as recruitment fees), poor working conditions and lack of occupational health and safety. Within the supply chain, salient risks to rights holders include violation of land and property rights, and risks relating to conflict, security and corruption.

The outcomes of the risk assessment have directly informed SSE Renewables' Human Rights Action Plan, which sets out how the SSE Human Rights Strategy will be implemented within its business. SSE Renewables welcomes further engagement with stakeholders on its risk assessment process and outcomes.



Prioritising additional due diligence on high-risk supply chains

Solar supply chains have increased potential human rights risks and are a key priority area for increased monitoring, due diligence, and mitigation measures. As SSE Renewables expands its large-scale solar portfolio it is increasing its focus on human rights along all stages of the supply chain.

Due diligence in this area focuses on:

1. Increasing transparency and traceability

Over 2023/24, SSE Renewables has worked with potential solar PV suppliers to increase visibility of possible silicon supply chains. Visibility was increased to tier seven of the supply chain, up to quartz mine level.

Specialist supply chain due diligence was conducted using a risk-based approach, focusing on polysilicon, metallurgical grade silicon and quartz. SSE Renewables aims to develop approved suppliers, based on due diligence outcomes, for use by supply chain partners on future projects.

SSE Renewables has transparently shared findings from the due diligence conducted with its suppliers to enable corrective action plans, where required.

Overall, this approach will reduce the risk of exposure to forced labour.

2. Embedding robust human rights due diligence throughout the procurement lifecycle

Over 2023/24, SSE Renewables has developed and embedded a set of iterative 'no-go' criteria on human rights to underpin purchasing practices for solar PV. This ensures that salient

human rights issues such as forced labour take precedence in the procurement process. Enhanced ESG questions have been embedded into the tender process to strengthen risk identification. SSE Renewables is seeking to develop further its right to audit within contracts, alongside exploring a range of auditing options and other monitoring measures, acknowledging challenges associated with this supply chain.

3. Engaging in collective action to identify areas for leverage

SSE Renewables works closely with its peers on addressing human rights risks in large scale solar, notably in the International RBC Agreement for the Renewable Energy Sector and the Solar Stewardship Initiative (SSI), and through its membership of Solar Energy UK.

Incorporating this approach across additional high-risk supply chains

BESS supply chains are another priority area identified through SSE Renewables' risk assessment. SSE Renewables is currently engaging with its suppliers on supply chain transparency and human rights risk management. SSE Renewables has also requested corrective actions from BESS suppliers via the EcoVadis platform to improve suppliers' overall ESG performance.

SSE Renewables is currently prioritising minerals across wind and hydro using a risk-based approach based on saliency and materiality for enhanced due diligence and transparency, with the company welcoming engagement with all stakeholders to help increase the robustness of its approach.



Preventative and mitigation measures

Preventative and mitigation measures aim to ensure high labour standards and responsible sourcing practices. The below diagram provides a summary of each one and section 5.4 provides more detail about each of these measures along with links to more information.



 <p>Guarantee of fair and decent work</p> <p>High labour standards, inclusive policies and training and growth opportunities.</p>	 <p>Providing a safe and secure workplace</p> <p>SSE's Safety and Health policy (and related systems and procedures) manages excessive working hours, fatigues, and employee safety, health, and wellbeing. Whistleblowing processes in place for SSE workforce and external workers.</p>
 <p>Fair pay and hours</p> <p>Enhanced minimum standards through Living Wage, Living Hours, and Living Pensions accreditations.</p>	 <p>Collective bargaining and freedom of association</p> <p>Everyone at SSE has the right to freedom of association including the right to join a trade union.</p>
 <p>Safeguarding for at-risk employees and young people</p> <p>SSE has a Safeguarding Policy in place to ensure the safety of children and young people, and vulnerable employees.</p>	 <p>Contractual clauses</p> <p>Modern slavery and Living Wage clauses are included within procurement contracts to help mitigate the risk of human rights abuses in SSE's supply chains.</p>
 <p>Verifying right to work</p> <p>SSE ensures that the right to work is evidenced for all workers and requires this same standard from contractors and staffing agencies.</p>	 <p>Supplier screening and ongoing supplier checks</p> <p>SSE monitors suppliers' human rights management and other sustainability risks as part of onboarding questions and annual checks, as well as use of the tools and measures available through EcoVadis (see section 5.3). Suppliers must adhere to the Sustainable Procurement Code.</p>

Embedding human rights auditing

Over 2023/24, SSE has been working to identify the most effective way to audit and engage suppliers on their approach to human rights management both at a business level and on-site, and is now embedding auditing into existing Safety, Health, and Environment (SHE) audits run by SSE's Group SHE Audit and Assurance Team. The SHE Specification for Contractors is being updated to include human rights and modern slavery criteria. This will be published and distributed to contractors over 2024/25.

4.3. Pillar 2: Response and doing the right thing

Grievance mechanisms and reporting wrongdoing

SSE's grievance and reporting mechanisms support employees and anyone working on behalf of SSE to speak up, with the option to remain anonymous.

SSE's internal reporting channel, Speak Up, and its external channel, SafeCall are aligned with the UN Guiding Principles (UNGPs) 31 effectiveness criteria and the Acas Code of Practice on Disciplinary & Grievance Procedures.

Over 2023/24, 73 reports of suspected wrongdoing were made through SSE's reporting channels (SafeCall and Speak Up), compared to 50 the previous year.

The rise in reports follows growth in headcount, a simpler reporting process and awareness raising. See SSE's Sustainability Report 2024 for more details.

It is important that indirect workers have access to grievance mechanisms. SSE's Modern Slavery Clause (see section 5.4) and SSE's Sustainable Procurement Code and Supplier Guidance requires suppliers to ensure employees working on SSE's behalf have access to a means for reporting an actual or suspected instance or risk of slavery or human trafficking.

Investigating wrongdoing and taking action

At SSE, grievance and whistleblowing reports are treated in good faith and referred, as appropriate, to SSE's Group Security and Investigations team.

SSE takes a case-by-case approach to instances of non-compliance from suppliers. The nature and severity will determine the corrective action taken with measures ranging from collaborating to make improvements to issuing warnings and, if required, ceasing work with them.

After-care for those who speak up

SSE takes measures to ensure that SSE employees that speak up are aware there will be no negative repercussions and they are treated fairly and with respect.



Recognising the impact of an investigation on those who are accused of wrongdoing, SSE limits the duration of the investigation period, following a report through Speak Up, to a maximum of 45 days. All those impacted by a whistleblowing incident are offered information about SSE's Employee Assistance Programmes at the outset of the process.

SSE's aftercare survey is designed to gain feedback and improve future processes to further support SSE employees to speak up. In 2023/24, SSE issued 60 aftercare surveys.

The outcomes of reported incidents and investigations are in SSE's Sustainability Report 2024.

Ensuring clear lines of escalation and access to remedy

Following the finalisation of SSE's Human Rights Escalation Procedure in 2022/23, over 2023/24 SSE worked to implement the procedure across the business by testing it with key stakeholders and engaging with Legal and Risk teams.

In 2023/24, SSE also further developed its approach to remediation, aligning with the UNGPs and the OECD Due Diligence guidance. The process enables SSE to identify its connection to a human rights incident that occurs within its value chain and identify potential appropriate remediation. Guidance on effective remediation principles, use of leverage, and responsible disengagement is included.

For more detailed information on SSE's grievance mechanisms and alignment to the UNGP 31 effectiveness criteria see section 5.5



4.4. Pillar 3: Governance

SSE's human rights governance structure

SSE's governance structure ensures responsibility for the management of human rights risk sits at the most senior levels of the business and that senior leaders across key business areas oversee risk and due diligence measures on an ongoing basis.



Board

- Overall responsibility for SSE's approach to protecting human rights and mitigating the risk of modern slavery.
- Approves SSE's Human Rights Report and Modern Slavery Statement and the Group Human Rights Policy.

Group Executive Committee

- Approves SSE's Human Rights Report and Modern Slavery Statement.
- Ensures group policies are adhered to by supporting policy owners, monitoring policy implementation, and reviewing incidents and breaches.

Group Risk Committee

- 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.

Human Rights Steering Group

- Reports to the Group Risk Committee.
- Responsible for the delivery of SSE's Human Rights Strategy and the implementation of its Action Plan.

SSE's Businesses

- Identified leads are responsible for implementing policies and procedures with input from the SSE plc corporate teams.

Policies and standards

SSE has a framework of policies and standards outlining SSE's approach to ethical business.

Key policies and standards that help mitigate the risk of human rights abuses and modern slavery include:

- **Doing The Right Thing - employee guide to good business ethics:** integrates human rights and modern slavery risk management into its approach to good business ethics. It sets out the behaviours and principles of behaviour at SSE, including respecting recognised international human rights and reporting suspected instances of human rights violations.
- **Group Human Rights Policy** describes the company's approach and responsibility to protect the human rights of its employees and people employed in its supply chain.
- **Group Whistleblowing Policy** supports employees to speak up and report suspected wrongdoing, including potential human rights abuses.
- **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. SSE has voluntarily signed up to and is committed to the obligations of the Prompt Payment Code and its principles
- **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 widely available to all employees and implementation of their key messages is supported by the employee guide, dedicated training, and communications.

Developing SSE's human rights KPIs

Over 2023/24, SSE has been developing an approach for setting key performance indicators (KPIs) to track and monitor progress against its human rights management and due diligence measures.

Meaningful KPIs help monitor the impact of its human rights mitigation. SSE has consulted with Churches, Charities and Local Authorities (CCLA) Investment Management Limited and human rights experts, twentyfive, to identify best practice approaches for setting indicators.

Below are five KPIs which enable SSE to monitor progress in its human rights approach. SSE keeps these under continual review and is identifying approaches to develop KPIs that measure the impact of preventative actions.



KPI	Metric	2023/24 data	Time period
1. Human rights and worker rights related grievances raised through formal mechanisms	Total number / number relating to human rights / number relating to worker rights	73 / 0 / 38	1 April 2023 - 31 March 2024
2. Employees attending training on human rights	Number of employees	186	1 April 2023 - 31 March 2024
3. Tier one suppliers categorised from medium to very high risk for human rights	% medium low/ medium-high/ high risk	36% / 8% / 0.1%	At September 2024
4. Suppliers with a grievance mechanisms or whistleblowing procedure on labour and human rights issues	% of suppliers by spend	50%	At September 2024
5. Suppliers accessing modern slavery content through the Supply Chain Sustainability School	% of suppliers by spend	33%	1 April 2023 - 31 March 2024



4.5. Pillar 4: Disclosure and collaboration

Human rights disclosure and reporting

SSE is committed to transparent and open disclosure related to human rights risks, mitigation and due diligence measures.

In addition to this report, SSE discloses details about human rights risk and management in investor surveys such as the Workforce Disclosure Index (WDI). SSE also engages with dedicated human rights frameworks and benchmarks such as the CCLA modern slavery disclosure benchmark and the Global Child Forum Benchmark.

In addition, it has a number of reports relating to social impact and human rights covering sustainability, inclusion and diversity, community investment, stakeholder engagement and just transition. Visit [sse.com](https://www.sse.com) to read these reports.

Engagement with CCLA

Over 2023/24 SSE openly engaged with the CCLA to better understand investor and stakeholder requirements around human rights reporting, how to better align with industry best practice, and both disclosure and strategic gaps in its human rights approach.

Some of the gaps highlighted have been addressed in this report, and others form part of SSE's Action Plan and will be addressed in 2024/25. Following SSE's engagement with the CCLA, in January 2024, SSE and Utilities Against Slavery (UAS) invited the CCLA to present information and insights about reporting expectations on human rights to UAS member companies.

Sharing learnings and industry collaboration

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.

Policy advocacy and knowledge sharing with private, public and third sectors

- **UAS (member since 2020):** SSE was one of the first companies to join UAS and in 2023 it became a member of the Steering Group. Over 2023/24, SSE also continued to Chair the Training working group.
- **Scotland Against Modern Slavery (SAMS) (member since 2023):** SAMS brings together the Scottish Government with over 50 business, charities, and NGOs, with the core aims of raising awareness of modern slavery, supporting survivors, and protecting vulnerable communities from exploitation.
- **Supply Chain Sustainability School's modern slavery working group (member since 2021):** Through the Supply Chain Sustainability School (SCSS), SSE employees and its suppliers can access a range of guidance, resources and accredited training materials, including human rights and modern slavery content. See section 4.6 for how SSE has used SCSS training over 2023/24.
- **Living Wage Steering Group on the Global Living Wage (member since 2023):** SSE chairs the Living Wage Leadership Group in Scotland and is a member of the Living Hours Steering Group. In addition, SSE is on the 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.
- **Just Transition Commission (represented since 2019):** SSE's Chief Sustainability Officer is a commissioner on this body which provides scrutiny and advice to the Scottish Government.
- **International renewable energy groups** SSE Renewables participates in working groups with peers and stakeholders to specifically address salient human rights risks in the renewable sector, including the Solar Stewardship Initiative and the International RBC Agreement for the Renewable Energy Sector.



4.6. Pillar 5: Training and awareness

Raising awareness to SSE colleagues

SSE aims to ensure everyone working on behalf of SSE can be its eyes and ears on human rights abuses, including modern slavery. SSE's internal training covers how to spot the signs of modern slavery and how to report any suspected instances.

Embedding human rights into business ethics training

Over 2023/24 SSE delivered a human rights webinar as part of SSE's Doing The Right Thing Week. The week is designed to raise employees' awareness of SSE's principles for good business ethics (SSE's guide on business ethics can be found on [sse.com](https://www.sse.com)).

The session, which reached 80 employees, focused on communicating SSE's approach to managing human rights risk, what employees can do within their roles, and advice on spotting the signs of human rights abuses and modern slavery. This webinar along with additional resources from SSE and the Supply Chain Sustainability School (SCSS) are available on SSE's internal systems for employees to access at any time.

Modern slavery learning pathway for project teams

Following the 2022/23 roll out of bespoke Project Manager and Procurement team training with the SCSS, over 2023/24, SSE developed a modern slavery specific learning pathway for project teams working at SSE and within its supply chain.

The training, hosted on the SCSS portal, provides an overview of what modern slavery is, its prevalence in construction projects, advice around how employees can spot the signs of modern slavery and guidance on where they should report suspected instances.

As part of SSE's partnership with the SCSS, over 2023/24, 140 SSE suppliers completed 4,984 resources around human rights, employment conditions and modern slavery.

Ensuring Safety, Health, and Environment colleagues can spot the signs of modern slavery

SSE's Safety, Health, and Environment (SHE) colleagues play a key role in ensuring that 'everyone gets home safe' which

includes being able to spot the signs of modern slavery across SSE's operation locations.

Over 2023/24, an awareness raising presentation was delivered to just over 100 SHE professionals which outlined how safety instances can both be increased by and be an indicator of modern slavery. Following this, additional collaboration opportunities were identified including integrating modern slavery into the SHE communications calendar, attending SHE events, and engaging with SHE colleagues across the business which will be actioned over 2024/25.

Engaging beyond the utilities industry

Collective action needs to span beyond the utilities sector to effectively mitigate adverse human rights impacts and address systemic issues which span across multiple converging supply chains. Over 2023/24 SSE participated in a number of events that raise awareness of human rights and modern slavery. These sessions provided SSE the opportunity to share its own successes and challenges, contribute to industry discussions on salient risks, and learn from others.

- As part of Anti-Slavery week in October 2023, SSE joined the UAS panel alongside Slave Free Alliance to discuss maritime human rights risks
- In November 2023, SSE presented its human rights approach to Business In The Community Ireland (BITC).
- SSE hosted a roundtable in November 2023 at COP28 to discuss human rights risk within critical minerals supply chains.
- In March 2024, SSE presented its approach to 'managing the S in ESG' with Action Sustainability at their annual conference on social value.
- SSE Renewables attended the OECD Forum on Responsible Minerals Supply Chains in Paris participating in round tables and panel events to advocate for respect for human rights and share challenges on due diligence in mineral supply chains.



5. Appendices

5.1. Appendix 1: SSE's tier one supplier location data

Table 1 outlines the location of SSE's tier one suppliers, based on the billing addresses provided to SSE by suppliers in 2023/24.

Operation location	Number of SSE's tier one suppliers	Proportion of SSE's tier one suppliers
United Kingdom	4598	86.82%
Ireland	449	8.48%
USA	44	0.83%
Netherlands	38	0.72%
Germany	29	0.55%
Other*	138	2.61%

Other is split across Europe, Canada, Japan, India, and Australia.

5.2. Appendix 2: Overview of salient human rights risks impacting the global energy sector and its value chain

SSE understands the salient human rights risk that impact the global energy sector in which it and its value chain operate. Table 2 outlines these risks. Information around how SSE identifies and manages these risks within its operations and value chain can be found in section 4.2 of this report. The actions taken to prevent and mitigate these risks can be found throughout this report.

Rights holder	Salient risks
Labour	<ul style="list-style-type: none"> Freedom of association Health and Safety Forced Labour Discrimination Child labour
Communities	<ul style="list-style-type: none"> Violation of indigenous peoples' rights (lack of Free and Prior Informed Consent) Land rights and protection from unlawful eviction Security arrangements and use of force Corruption and governance
Environment	<ul style="list-style-type: none"> Water quality and availability Air quality Noise pollution

5.3. Appendix 3: SSE's annual desk-based risk assessment analysis

In September 2023, SSE strengthened its supply chain engagement on sustainability through partnering with EcoVadis, a well-established business sustainability ratings platform. Through the EcoVadis platform, SSE has access to detailed sustainability information about its supply chain partners, allowing it to monitor supplier performance.

and improve performance management of the supply chain. For more information on SSE's EcoVadis partnership see [sse.com](https://www.sse.com) and for SSE's business specific in-depth risk assessment see pages 11 and 12.

Over 2023/24, SSE adopted the platform, as an independent risk assessment method, to monitor its suppliers human rights and labour related risks, due to the wide range of criteria EcoVadis uses to assess human rights risk. This has enabled SSE to identify key suppliers to engage with to improve risk ratings and alignment with human rights standards.

Table 3 outlines the EcoVadis risk rating for SSE's suppliers being rated through the platform (accounting for 97.6% of SSE's suppliers by spend as of September 2024).

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,

Risk rating	Number of suppliers	% of suppliers
Not rated	150	3%
Very Low	894	20%
Low	1570	35%
Medium low	1513	36%
Medium high	373	8%
High	4	0.1%
	4504	

5.4. Appendix 4: SSE's ongoing due diligence measures

Guarantee of fair and decent work

SSE's well-established framework for guaranteeing fair and decent work focuses on developing its existing workforce and 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 Annual Report and Sustainability Report which can both be found on [sse.com](https://www.sse.com). SSE has been a supporter and contributor to the workforce disclosure initiative (WDI) since its pilot in 2016.

Providing a safe and secure workplace

SSE's culture remains one where doing the right thing is paramount and safety is identified as the number one value. SSE's safety licence is "If it's not safe, we don't do it" with a core objective that 'everyone gets home safe'. A well-established governance framework underpins the safety of everyone, and SSE's safety management system is certified to the internationally recognised standard ISO45001.

Results from SSE's 2023 Great Place To Work employee survey showed that 9 out of 10 employees feels confident to speak around safety, a key part of SSE's safety culture.

As excessive working hours are both a safety risk and human rights abuse indicator, SSE 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.

Fair pay and 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, paid the Irish Living Wage since 2016, been Living Hours accredited in the UK since 2021, and Living Pensions accredited in the UK since 2023. These accreditations underline SSE's commitment to providing workers with fair pay, secure and guaranteed working hours, and contributing to increased financial stability in retirement.

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.

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 2023/24, 47.6% of SSE's total direct workforce were covered by collective bargaining agreements. The Joint Agreement, covering 47.3% 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 for vulnerable employees and young people

SSE is committed to safeguarding and protecting 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.

Contractual clauses

SSE includes two clauses within its procurement contracts to help mitigate the risk of human rights abuses including modern slavery within its supply chain and holds 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 supplier 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. It 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 and vessels workers.

Verifying right to work

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.

Supplier screening and ongoing supplier checks

SSE's Sustainable Procurement Code and accompanying Supplier Guidance set out SSE's expectations of the companies that supply SSE with goods and services. This includes paying a real Living Wage and implementing the highest safety standards on sites, and a specific section on modern slavery and human rights.

Potential new suppliers are requested to sign-on to SSE's Sustainable Procurement Code when registering on its Enterprise Resource Planning (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 questionnaire. SSE's pre-qualification questions (PQQ) template includes robust questions 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.

Suppliers are monitored on an ongoing basis throughout the supplier relationship through Jaggar and EcoVadis.

5.5. Appendix 5: SSE's grievance mechanism alignment to the UNGP 31 effectiveness criteria

UNGP 31 effectiveness criteria	SSE's grievance mechanism and procedure
Legitimate	<p>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 anonymously through an independent whistleblowing channel, called Safecall, as well as through SSE's internal channel, Speak Up.</p> <p>SSE's Whistleblowing policy outlines employees can raise their concerns on an anonymous and confidential basis without fear of any recrimination or adverse impact in doing so.</p> <p>The effectiveness of SSE's whistleblowing arrangements is reviewed twice yearly by the Group Executive Committee and the Board.</p> <p>At SSE, speak up and whistleblowing reports, both those reported internally or externally, are always treated in good faith and referred to SSE's Group Security and Investigations team or another relevant department for full investigation, with appropriate action taken to prevent further wrongdoing. During these investigations interviews are undertaken and evidence is collated.</p>
Accessible	<p>Details for how to report wrongdoing through all of these channels are made publicly available through SSE's employee guide 'Doing the right thing', which includes specific information on speaking up about human rights and modern slavery. It is also promoted through mail drops to employees homes and located on their email dashboard. Contracts of employment alert employees to the existence of and where to locate the grievance procedure.</p> <p>Internal channels are available in English, whilst Safecall is available in many languages, shown on safecall.co.uk/report.</p> <p>SSE's Modern Slavery Clause (see section 5.4) and SSE's Sustainable Procurement Code and Supplier Guidance include a requirement that suppliers and contractors must provide a channel for people to speak up if they suspect modern slavery or human rights abuses when working on behalf of SSE.</p>
Predictable	<p>The grievance procedure is readily accessible to all colleagues on the intranet and hard copies can be made available upon request if an employee cannot gain access online.</p> <p>To minimise stress for all those involved and ensure that a fair resolution is reached as quickly as possible, SSE limits the duration of the investigation period to a maximum of 45 days, where possible. See SSE's Sustainability Report 2024 on sse.com for more information.</p>
Equitable	<p>For those who report suspected incidents of wrongdoing, SSE's triage system identifies risks so that they can be appropriately mitigated and directs the report to the most appropriate department for investigation.</p> <p>The AskHR team can provide advice and guidance to colleagues should they have any questions regarding their right to raise a grievance or the procedure more generally. HR Managers who are able to provide procedural support and guidance to colleagues on the routes available to them to resolve any workplace concerns they may have, whether under the formal grievance procedure or otherwise.</p>
Transparent	<p>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 over 2023/24 can be found on page 59 of the SSE's Annual Report 2024.</p>
Rights-compatible	<p>Formal grievances are managed by a specialist case management team who share learnings on managing cases through the grievance procedure. The case management team also receive regular employment law training to ensure that best practice continues to be observed in cases being managed under the grievance procedure.</p>
A source of continuous learning	<p>SSE's Speak Up Aftercare system collects feedback from employees involved in grievances for learning and prevention purposes.</p>
Based on engagement and dialogue	<p>SSE's grievance procedure has been agreed and negotiated with the four trade unions recognised by SSE. The same process is followed for colleagues not working under a collective bargaining agreement.</p>



5.6. Appendix 6: Businesses covered by the SSE Human Rights and Modern Slavery Statement 2024

Company	Country of incorporation	2024 Holding %	Principal activity
Aberarder Wind Farm (Scotland) Limited	Scotland	100.0	Renewable Development
Aberarder Wind Farm LLP	England and Wales	100.0	Renewable Development
Abernedd Power Company Limited	England and Wales	100.0	Holding Company
Aichi Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
Aichi Offshore Wind Power No. 2 G.K.	Japan	80.0	Renewable Development
Airtricity Windfarm Finance Limited	Ireland	100.0	Holding Company
Aldbrough Pathfinder Limited	England and Wales	100.0	Power Generation
Arklow Offshore Phase II Company Limited	Ireland	100.0	Dormant
Beithe (HK) Limited	Hong Kong	-	Holding Company
Berwick Bank A Limited	England and Wales	100.0	Renewable Development
Berwick Bank B Limited	England and Wales	100.0	Renewable Development
Berwick Bank C Limited	England and Wales	100.0	Renewable Development
Berwick Bank Holdings A Limited	England and Wales	100.0	Holding Company
Berwick Bank Holdings B Limited	England and Wales	100.0	Holding Company
Berwick Bank Holdings C Limited	England and Wales	100.0	Holding Company
Berwick Bank Wind Farm Limited	Scotland	100.0	Renewable Development
Bhlaraidh Extension Wind Farm Limited	Scotland	100.0	Power Generation
Bhlaraidh Wind Farm Limited	Scotland	100.0	Power Generation
Bindoo Windfarm (ROI) Limited	Ireland	100.0	Power Generation
BOC1234 Limited	Scotland	-	Dissolved
Brickmount Limited	Ireland	100.0	Power Generation
Building Automation Solutions Limited	England and Wales	100.0	Dormant
By-Pass Farm Solar Limited	England and Wales	100.0*	Power Generation
Coire Glas Hydro Pumped Storage Limited	Scotland	100.0	Power Generation
Comhlacht Gaoithe Teoranta	Ireland	100.0	Power Generation
Coomacheo Wind Farm Limited	Ireland	100.0	Power Generation
Coomatallin Windfarm (ROI) Limited	Ireland	100.0*	Power Generation
Curragh Mountain Windfarm Limited	Ireland	100.0	Power Generation
Dedondo Limited	Ireland	100.0	Power Generation
Dromada Windfarm (ROI) Limited	Ireland	100.0	Power Generation
Drumnahough Wind Farm Designated Activity Company	Ireland	100.0	Power Generation
Enerfarm 3 Single Member S.A. Renewable Energy Sources	Greece	100.0	Renewable Development
Energia Levante S.r.l.	Italy	100.0	Renewable Development
Energiaki Kleidi Single Member S.A.	Greece	100.0	Renewable Development
Energiaki Mavrovouniou Single Member Private Company	Greece	100.0*	Renewable Development
Energiaki Mesovouniou Single Member S.A.	Greece	100.0	Renewable Development
Energiaki Platorrachis Single Member S.A.	Greece	100.0*	Renewable Development
Energiaki Velanidias Single Member S.A.	Greece	100.0	Renewable Development
Energieo Ireland Limited	Ireland	100.0	Contracting

Company	Country of incorporation	2024 Holding %	Principal activity
Energieo Limited	England and Wales	100.0	Contracting
Enshunada Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
Ferrybridge Hydrogen Limited	England and Wales	100.0	Power Generation
Fibre Fuel Limited	England and Wales	100.0	Dormant
Fibre Power (Slough) Limited	England and Wales	100.0	Power Generation
Galway Wind Park Phase 3 Designated Activity Company	Ireland	100.0	Renewable Development
Ganderoy Limited	Ireland	100.0	Power Generation
Gartnaneane Limited	Ireland	100.0*	Power Generation
Glenora Wind Farm Designated Activity Company	Ireland	100.0	Renewable Development
Goto-Fukue Offshore Wind Power G.K.	Japan	80.0	Renewable Development
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	-	Dormant
Hydro Electric Pension Scheme Trustees Limited	Scotland	100.0	Dormant
Izu Islands Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
Keadby Developments Limited	England and Wales	100.0	Dormant
Keadby Generation Limited	England and Wales	100.0	Power Generation
Keadby Wind Farm Limited	England and Wales	100.0	Power Generation
Leanamore Wind Farm Limited	Ireland	100.0	Power Generation
Limerick West Windfarm Limited	Ireland	100.0	Power Generation
Littleton Pastures Solar Limited	England and Wales	100.0	Power Generation
March Winds Limited	Ireland	100.0	Power Generation
Medway Power Limited	England and Wales	100.0	Power Generation
Meentycat Limited	Ireland	100.0	Power Generation
Milane Holdings Limited	Ireland	100.0	Dormant
Minami-Izu Offshore Wind Power No. 1 G.K.	Japan	80.0	Renewable Development
Mullananalt Wind Farm (ROI) Limited	Ireland	100.0	Power Generation
Niigata Offshore Wind Power No.1 G.K.	Japan	80.0	Renewable Development
Oki Islands Offshore Wind Power G.K.	Japan	80.0	Renewable Development
Optimal Power Networks Limited	England and Wales	100.0	Construction of utility projects
Platin Power Limited	Ireland	100.0	Dormant
Pomerania PV sp z.o.o. (formerly Optisol 4 sp z.o.o)	Poland	100.0	Dormant
Power from Waste Limited	England and Wales	100.0	Renewable Development
Richfield Windfarm (ROI) Limited	Ireland	100.0	Dormant
Scottish and Southern Energy Power Distribution Limited	Scotland	100.0	Power Generation
Scottish Hydro Electric Power Distribution plc	Scotland	100.0	Holding Company
Scottish Hydro Electric Transmission plc	Scotland	75.0	Power Distribution
Seagreen Wind Energy Limited	England and Wales	49.0	Power Transmission
Sheskin South Renewables Power Designated Activity Company	Ireland	100.0	Renewable Development
Sistemas Energéticos Ábrego S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Ariel S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Boreas S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Carril S.L.U.	Spain	100.0	Renewable Development

Company	Country of incorporation	2024 Holding %	Principal activity
Sistemas Energéticos Céforo S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos del Sur S.A.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Eolo S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Erbania 1 S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Erbania 2 S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Gregal S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Júpiter S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Ladera Negra, S.A. U.	Spain	100.0	Renewable Development
Sistemas Energéticos Loma del Reposo S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Marte S.L. U.	Spain	100.0	Renewable Development
Sistemas Energéticos Mercurio S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Neptuno S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Oberón S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Plutón S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Tablero Tabordo, S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Terral S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Titán S.L.U.	Spain	100.0	Renewable Development
Sistemas Energéticos Tomillo S.A. U.	Spain	100.0	Renewable Development
Sistemas Energéticos Urano S.L. U.	Spain	100.0	Renewable Development
Slough Domestic Electricity Limited	England and Wales	100.0	Dormant
Slough Electricity Contracts Limited	England and Wales	100.0	Electricity Contracting
Slough Energy Supplies Limited	England and Wales	100.0	Dormant
Slough Heat & Power Limited	England and Wales	100.0	Power Generation
Slough Utility Services Limited	England and Wales	100.0	Distribution of Electricity
Société d'Exploitation de l'Installation de Stockage (SEIS) D'orchamps	France	100.0	Electricity Storage
Société d'Exploitation de l'Installation de Stockage (SEIS) de la Cuesta	France	100.0	Electricity Storage
Société d'Exploitation de la Centrale Photovoltaïque (SECPV) de Vireaux	France	100.0	Power Generation
Société d'Exploitation de la Centrale Photovoltaïque (SECPV) des Jacquessons	France	100.0	Power Generation
Société d'Exploitation du Parc Eolien de Chaintrix Bierges SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de Champeaux SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de Germainville SAS	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de la Belle Dame SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de la Brie des Etangs SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de la Monchot SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de la Tête des Boucs SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien (SEPE) de la Voie Pouçoise	France	100.0	Power Generation
Société d'Exploitation du Parc Eolien de Moulins du Puits SAS	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de Pringy SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de Saint Loup de Saintonge SAS	France	100.0	Renewable Development

Company	Country of incorporation	2024 Holding %	Principal activity
Société d'Exploitation du Parc Eolien (SEPE) de Salon Sud	France	100.0	Power Generation
Société d'Exploitation du Parc Eolien de Souvans SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de Vernierfontaine SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien de Villiers aux Chênes SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien des Fontaines SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien des Six Communes SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien des Voies de Bar SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien du Mont Égaré SARL	France	100.0	Renewable Development
Société d'Exploitation du Parc Eolien du Vireaux SAS	France	100.0	Renewable Development
Société du Poste Privé (SPP) de la Cuesta SARL (formerly Société d'Exploitation du Parc Eolien de la Pièce du Moulin SARL)	France	100.0	Renewable Development
Société du Poste Privé (SPP) d'Orchamps SARL (formerly Société d'Exploitation du Parc Eolien d'Orchamps SARL)	France	100.0	Renewable Development
Société du Poste Privé (SPP) du Tonnerrois	France	100.0	Power Generation
Southern Electric Power Distribution plc	England and Wales	100.0	Power Distribution
SPV Parco Eolico Libeccio S.r.l.	Italy	100.0	Renewable Development
SPV Parco Eolico Maestrale S.r.l.	Italy	100.0	Renewable Development
SPV Parco Eolico Tramontana S.r.l.	Italy	100.0	Renewable Development
SSE Airtricity Distributed Energy Limited	Ireland	100.0	Power Distribution
SSE Airtricity Energy Services Limited	Ireland	100.0	Energy Supply
SSE Airtricity Energy Services (NI) Limited (formerly Fusion Heating Limited)	Northern Ireland	100.0	Energy Related Services
SSE Airtricity Energy Supply (NI) Limited	Northern Ireland	100.0	Energy Supply
SSE Airtricity Gas Supply (NI) Limited	Northern Ireland	100.0	Energy Supply
SSE Airtricity Limited	Ireland	100.0	Energy Supply
SSE Battery Monk Fryston Limited	England and Wales	100.0	Power Generation
SSE Battery Salisbury Limited	England and Wales	100.0	Power Generation
SSE Beatrice Offshore Windfarm Holdings Limited	Scotland	100.0	Holding Company
SSE BTM HoldCo Limited	England and Wales	100.0	Holding Company
SSE BTM Operational Assets Limited	England and Wales	100.0	Holding Company
SSE Contracting Group Limited	England and Wales	100.0	Holding Company
SSE Cottered Solar Limited	England and Wales	100.0	Power Generation
SSE Cumarsáid Teoranta	Ireland	100.0	Telecommunications
SSE Daines BESS Limited	England and Wales	100.0	Power Generation
SSE DE EV Holdco Limited	England and Wales	100.0	Holding Company
SSE DE Solar Holdco Limited	England and Wales	100.0	Holding Company
SSE Derrymeen BESS Limited (formerly Heron Storage No. 1 Limited)	Northern Ireland	100.0	Renewable Development
SSE Digital Services Limited	England and Wales	100.0	Holding Company
SSE Eggborough Limited	England and Wales	100.0	Power Generation
SSE Energy Markets Limited (formerly SSE EPM Limited)	England and Wales	100.0	Energy Trading
SSE Energy Supply Limited	England and Wales	100.0	Energy Supply
SSE Enterprise Limited	England and Wales	100.0	Corporate Services
SSE EV M7 Limited	England and Wales	100.0	Power Generation

Company	Country of incorporation	2024 Holding %	Principal activity
SSE EV Operational Assets Limited	England and Wales	100.0	Power Generation
SSE Ewerby Solar Holdco Limited	England and Wales	100.0	Holding Company
SSE Ewerby Solar Limited	England and Wales	100.0	Power Generation
SSE Fancott BESS Limited	England and Wales	100.0	Power Generation
SSE Ferrybridge Battery Limited	England and Wales	100.0	Power Generation
SSE Fiddlers Ferry Battery Limited	England and Wales	100.0	Power Generation
SSE Foxholes Solar Limited	England and Wales	100.0	Power Generation
SSE Galloper Offshore Windfarm Holdings Limited	England and Wales	-	Holding Company
SSE Generation Ireland Limited	Ireland	100.0	Power Generation
SSE Generation Limited	England and Wales	100.0	Power Generation
SSE Group Limited	Scotland	100.0	Dormant
SSE Heat Networks (Battersea) Limited	England and Wales	100.0	Dormant
SSE Heat Networks Limited	Scotland	100.0	Utility Services
SSE Hornsea Limited	England and Wales	100.0	Gas Storage
SSE Hydrogen Holdings Limited	England and Wales	100.0	Holding Company
SSE Hydrogen Developments Limited	England and Wales	100.0	Power Generation
SSE IAMP Microgrid Limited	England and Wales	100.0	Utility Services
SSE Imperial Park PN Limited	England and Wales	100.0	Power Generation
SSE Insurance Limited	Isle of Man	100.0	Insurance
SSE Knapthorpe Solar Limited	England and Wales	100.0	Power Generation
SSE Low Carbon Developments Limited	England and Wales	100.0	Power Generation
SSE Low Carbon Holdings Limited	England and Wales	100.0	Holding Company
SSE Maple Limited	England and Wales	100.0	Investment Holding
SSE Medway Operations Limited	England and Wales	100.0	Holding Company
SSE Micro Renewables Limited	Scotland	100.0	Energy Related Services
SSE Multifuel Generation Holdings Limited	England and Wales	100.0	Holding Company
SSE Muskham Solar Limited	England and Wales	100.0	Power Generation
SSE Newchurch Solar Limited	England and Wales	100.0	Power Generation
SSE OWS Glasgow Limited	Scotland	100.0	Property Holding
SSE Pacifico K.K.	Japan	80.0	Renewable Development
SSE Private Networks Holdco Limited	England and Wales	100.0	Holding Company
SSE Production Services Limited	England and Wales	100.0	Maintenance Services
SSE Renewables France SARL (formerly Société d'Exploitation du Parc Eolien de Broys SARL)	France	100.0	Renewable Development
SSE Renewables (Ireland) Limited	Ireland	100.0	Holding Company
SSE Renewables Iris Solar 1 sp. z o.o. (formerly IBC SE PL3 sp. z o.o.)	Poland	100.0	Renewable Development
SSE Renewables Iris Solar 2 sp. z o.o. (formerly IBC SE PL20 sp. z o.o.)	Poland	100.0	Renewable Development
SSE Renewables Iris Solar 3 sp. z o.o. (formerly IBC SE PL22 sp. z o.o.)	Poland	100.0	Renewable Development
SSE Renewables Iris Solar 4 sp. z o.o. (formerly IBC SE PL23 sp. z o.o.)	Poland	100.0	Renewable Development
SSE Renewables Iris Solar 5 sp. z o.o.	Poland	100.0	Renewable Development

Company	Country of incorporation	2024 Holding %	Principal activity
(formerly IBC SE PL24 sp. z o.o.)			
SSE Renewables Iris Solar 6 sp. z o.o. (formerly IBC SE PL34 sp. z o.o.)	Poland	100.0	Renewable Development
SSE Renewables (Netherlands) Holdings B.V.	Netherlands	100.0	Holding Company
SSE Renewables Developments (Germany) GmbH	Germany	100.0	Renewable Development
SSE Renewables Developments (The Netherlands) B.V.	Netherlands	100.0	Renewable Development
SSE Renewables Generation Ireland Limited	Ireland	100.0	Power Generation
SSE Renewables Hellas Single Member S.A. (formerly Energiaki Voursana Single Member S.A.)	Greece	100.0	Renewable Development
SSE Renewables Holdings (Europe) Limited	Ireland	100.0	Holding Company
SSE Renewables Holdings (UK) Limited	Northern Ireland	100.0	Holding Company
SSE Renewables Holdings Germany GmbH	Germany	-	Dormant
SSE Renewables Holdings Limited	Ireland	100.0	Holding Company
SSE Renewables International Holdings Limited	Scotland	100.0	Holding Company
SSE Renewables Limited	Scotland	100.0	Holding Company
SSE Renewables North America Inc.	United States	100.0	Renewable Development
SSE Renewables North America Offshore Wind LLC.	United States	100.0	Renewable Development
SSE Renewables North America Services Inc	United States	100.0	Renewable Development
SSE Renewables Off Shore Limited	Ireland	100.0	Holding Company
SSE Renewables Offshore Windfarm Holdings Limited	Scotland	100.0	Holding Company
SSE Renewables Onshore Windfarm Holdings Limited	Northern Ireland	100.0	Holding Company
SSE Renewables Poland Holdings Limited	Scotland	100.0	Holding Company
SSE Renewables Poland sp z.o.o.	Poland	100.0	Renewable Development
SSE Renewables Services (UK) Limited	Northern Ireland	100.0	Renewable Development
SSE Renewables Solar & Battery Holdings Limited (formerly SSE DE Battery Holdco Limited)	England and Wales	100.0	Holding Company
SSE Renewables UK Limited	Northern Ireland	100.0	Power Generation
SSE Renewables Wind (Ireland) Holdings Limited	Ireland	100.0	Holding Company
SSE Renewables Wind Farms (Ireland) Limited	Ireland	100.0	Power Generation
SSE Renewables Wind Farms (UK) Limited	Scotland	100.0	Power Generation
SSE Retail Limited	Scotland	100.0	Energy Related Services
SSE Seabank Investments Limited	England and Wales	100.0	Dormant
SSE Seabank Land Investments Limited	England and Wales	100.0	Dormant
SSE Services plc	England and Wales	100.0	Corporate Services
SSE Southern Group Trustee Limited	England and Wales	100.0	Dormant
SSE Staythorpe Battery Limited	England and Wales	100.0	Power Generation
SSE Staythorpe Power Limited	England and Wales	100.0	Power Generation
SSE Staythorpe SGT Limited	England and Wales	100.0	Power Generation
SSE Staythorpe Solar Limited	England and Wales	100.0	Power Generation
SSE Southery Solar Limited	England and Wales	100.0	Power Generation
SSE Stock Limited	Scotland	100.0	Stock Holding
SSE Sunflower Offshore Wind Holdco B.V.	Netherlands	100.0	Renewable Development
SSE Sunflower Offshore Wind Limited Partner 1 B.V.	Netherlands	100.0	Renewable Development
SSE Sunflower Offshore Wind Limited Partner 2 B.V.	Netherlands	100.0	Renewable Development

Company	Country of incorporation	2024 Holding %	Principal activity
SSE Sunflower Offshore Wind Limited Partner 3 B.V.	Netherlands	100.0	Renewable Development
SSE Sunflower Offshore Wind Limited Partner 4 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 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
SSE Yuza Offshore Wind Power G.K. (formerly SSE Happo-Nishiro Offshore Wind Power G.K.)	Japan	80.0	Renewable Development
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
Sure Partners Limited	Ireland	100.0	Renewable Development
S + S Limited	Scotland	100.0	Dormant
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
Tokushima Offshore Wind Power G.K.	Japan	80.0	Renewable Development
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

All shares in subsidiary companies are ordinary share capital, unless otherwise stated.

* 100% of voting rights held



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