



HUMAN RIGHTS & MODERN SLAVERY **STATEMENT**

2022



About SSE

SSE provides energy needed today while building a better world of energy for tomorrow. It invests in, develops, builds, and operates low-carbon electricity infrastructure in support of the transition to net zero. This includes onshore and offshore wind, hydro power, flexible thermal generation, electricity transmission and distribution networks, and localised energy systems. It also provides energy products and services for businesses and other customers.

About this statement

This is SSE's seventh 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 2022. All of SSE's previous Human Rights and Modern Statements can be found on <https://www.sse.com/sustainability/policies-and-assurances/>. Where SSE has procurement or operational control of a joint venture, it is covered by the policies and processes applicable to wholly owned SSE businesses unless otherwise stated. The full list of businesses covered by SSE's Human Rights and Modern Slavery Statement can be found on pages 25 to 28.

SSE has zero tolerance of human rights abuses and modern slavery in all its forms and has a responsibility to understand the risks within its own business and supply chain and to reduce those risks.

SSE is fully committed to upholding the UN Guiding Principles on Business and Human Rights, the aims of the UN Sustainable Development Goals, the principles underpinning the UN Global Compact, of which it is a signatory, 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 increased transparency each year 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 2021 and 31 March 2022 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 21 July 2022.



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 VISION, STRATEGY, AND PURPOSE

OUR PURPOSE

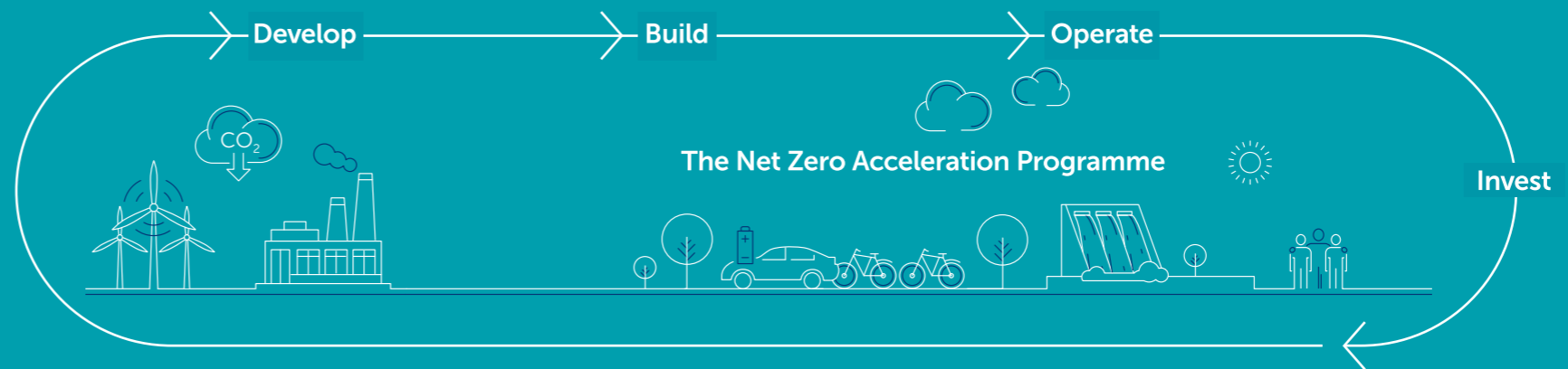
To provide energy needed today while building a better world of energy for tomorrow.

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

With an eye to net zero, in 2022 SSE revised its interim goals aligned to the UN's SDGs for 2030.



Cut carbon intensity by 80%



Increase renewable energy output fivefold



Enable low-carbon generation and demand



Champion a fair and just energy transition



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.



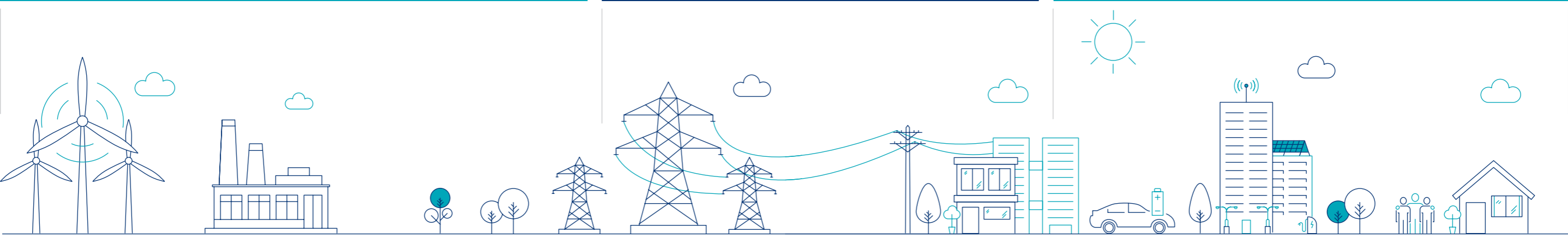
Excellence
We continually improve the way we do things.



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

SSE'S BUSINESS STRUCTURE

A strategically coherent business mix focused on net zero



<p>SSE Renewables</p> <p><i>What it does</i> Develops, builds, operates, and invests in assets that generate electricity from renewable sources.</p> <hr/> <p>1,314 Employees</p> <p>61% of SSE's supply chain spend (including joint ventures)</p>	<p>SSE Thermal</p> <p><i>What it does</i> 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.</p> <hr/> <p>516 Employees</p> <p>8% of SSE's supply chain spend</p>	<p>Energy Portfolio Management</p> <p><i>What it does</i> Provides energy trading, risk management and settlement services, as well as other analytical support and insights.</p> <hr/> <p>244 Employees</p> <p>1% of SSE's supply chain spend</p>	<p>SSEN Transmission</p> <p><i>What it does</i> Owns, operates, and maintains the electricity transmission network in the North of Scotland.</p> <hr/> <p>919 Employees</p> <p>11% of SSE's supply chain spend</p>	<p>SSEN Distribution</p> <p><i>What it does</i> Owns, operates, and maintains the electricity networks in the North of Scotland and central southern England.</p> <hr/> <p>4,124 Employees</p> <p>8% of SSE's supply chain spend</p>	<p>Customers</p> <p><i>What it does</i> Provides energy and related services to households, businesses and public sector organisations across the UK and Ireland.</p> <hr/> <p>1,621 Employees</p> <p>3% of SSE's supply chain spend</p>	<p>Distributed Energy*</p> <p><i>What it does</i> Invests in, builds, and connects localised flexible energy infrastructure. This includes developing solar and battery projects, operates heat networks and offers integration, aggregation, and trading capability.</p> <hr/> <p>809 Employees</p> <p>1% of SSE's supply chain spend</p>	<p>SSE Corporate</p> <p><i>What it does</i> Provides HR, legal, finance, IT, procurement, investor relations, corporate affairs, sustainability, and other services for SSE Group.</p> <hr/> <p>1,207 Employees</p> <p>7% of SSE's supply chain spend</p>
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* Following the sale of its Contracting arm, SSE Enterprise is now referred to as Distributed Energy



UNDERSTANDING SSE'S DIRECT AND INDIRECT WORKFORCE

The majority of SSE's operations currently take place in the UK and Ireland. However, SSE's ambitions for the development of renewable energy now extend to carefully selected international markets, including East Asia, mainland Europe and North America. As SSE expands in size, and geographical locations, the prevention of human rights violations and modern slavery are a priority.

Responsible employer ethos

SSE has a well-established responsible employer ethos, which focuses on developing its workforce from within, limiting out-sourcing of core work where possible, and creating an inclusive culture where employees are treated with fairness and respect. 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 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. In 2021, SSE's WDI submission was in the top 10% in terms of disclosure levels.

Robust health and safety standards

The safety of everyone who works for SSE, and the people who come into contact with the Company, is a long-standing priority. SSE's safety licence is "If it's not safe, we don't do it". With this 'Safety Family' culture firmly embedded, a new safety and health Vision 2022+ programme builds on a simple concept - setting teams up for success by making it easier to do the right thing, so that everyone gets home safe. SSE seeks to understand underlying employee sentiment towards safety and the annual all-employee survey undertaken in summer 2021 found that safety was recognised as the number one priority for SSE colleagues and SSE's licence "if it's not safe, we don't do it" is something that SSE colleagues live by.

SSE has very high safety standards for both direct workers and contractors and reported a slight

deterioration in both groups over 2021/22. The total number of injuries was 51, compared to 47 over 2020/21. See SSE's Sustainability 2020 page 84-85 for details on Safety and Health performance over 2021/22.

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.

Direct workforce

The majority of SSE's direct workforce is based in the UK or Ireland. At 31 March 2022, SSE had 10,754 direct employees who work across offices, depots, operational sites and construction sites. Just over 93% 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 2022, SSE's employees had an average length of service of 9.7 years and 94% of employees were on permanent contracts. An average employee's earnings were £38,189 and each employee received an average of 20.7 hours of training over the year. Women comprised 28.8% of SSE's workforce on 31 March 2022.

Contingent workforce

On 31 March 2022, SSE had a contingent labour force of 1,767 people, with 97% of these individuals working in the UK and 3% in Ireland. These are people 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 the last few years, SSE has spent around £2-4.5bn annually through its supply chain with around 10,000 tier 1 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 can vary significantly, 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 has worked with PwC since 2011/12 to better understand the supply chain of its activities. In 2021/22, SSE's activities supported a total of 47,000 jobs across the UK and Ireland. These reports can be found on [sse.com/sustainability](https://www.sse.com/sustainability).

For more information on SSE's workforce see the Sustainability Report 2022 and accompanying data tables on <https://www.sse.com/investors/reports-and-results/>

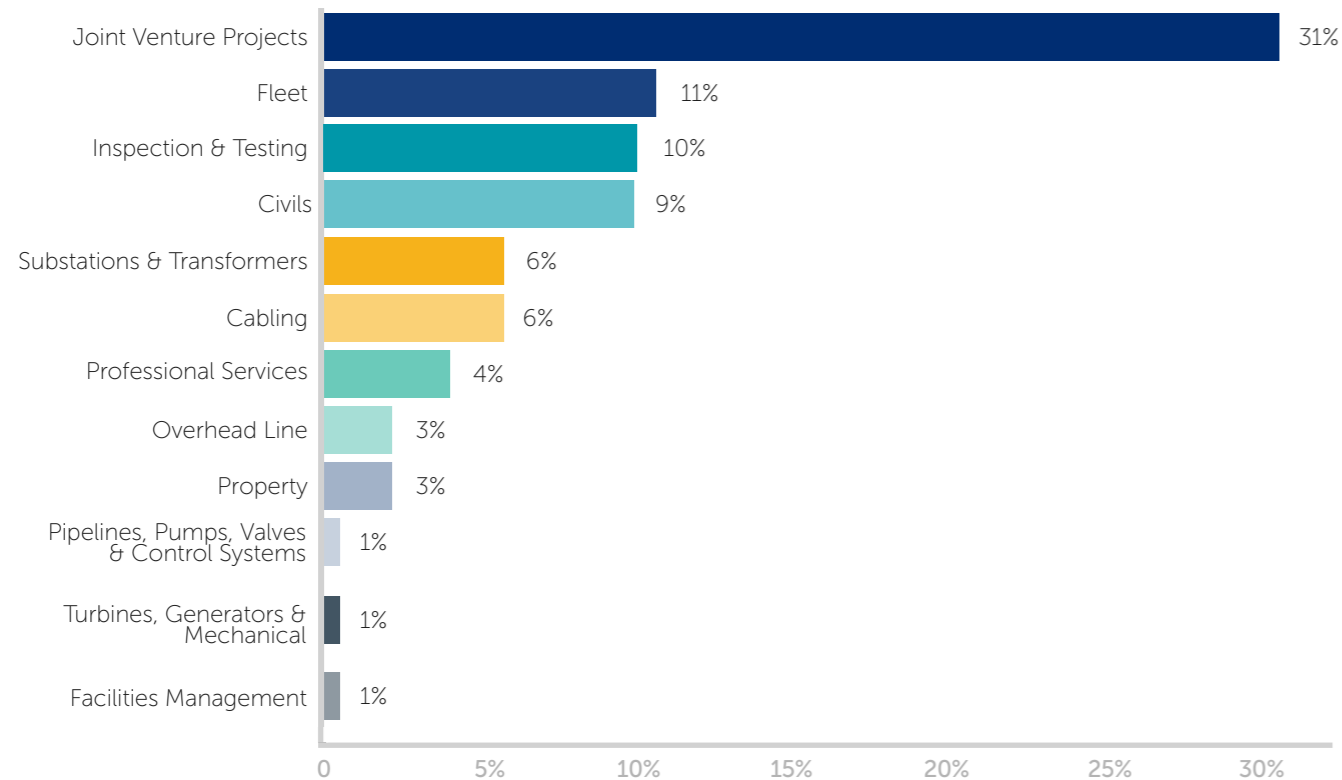


SUPPLY CHAIN OVERVIEW

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 over 10,000 suppliers and a £12.5bn investment program to 2025, collaborating with supply chain partners is central to achieving SSE's 2030 business goals and has been a key focus over 2021/22.

Over 2021/22, SSE spent around £4.5bn with its suppliers, including Joint Venture projects. Approximately 64% 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. Goods purchased include wind turbines, transmission towers, materials and components for assets and cable. Around 20% of spend is attributed to supporting employees to ensure they have the right tools for their job, opportunities for upskilling and 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 ventures account for 31% of SSE's tier 1 supplier spend, and are a key focus area for SSE over 2022/23.

Tier 1 spend categories (proportion of total spend)



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 2021/22, 86% of SSE's tier one supplier spend is attributed to the UK, 4 % in Sweden, 3% in Belgium, 2% in Ireland, 1% in the Netherlands, and 1% in Norway.



ROBUST GOVERNANCE

Governing SSE's human rights approach

BOARD OF DIRECTORS

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 signs off SSE's Human Rights and Modern Slavery Statement.

GROUP EXECUTIVE COMMITTEE

The Group Executive Committee receives a bi-annual update on activities relating to human rights risk mitigation. It signs off SSE's Human Rights and Modern Slavery Statement, receives a full annual update of activity, receives a mid-year update on progress made, 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.

GROUP RISK COMMITTEE

SSE's Human Rights Steering Group reports to the Group Risk Committee on a quarterly basis. 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, Group Energy and Commercial Director, 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 quarterly 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, the Head of Learning and Talent, and the Head of Sustainability for Renewables.

Policies and standards

SSE has a comprehensive framework of policies and standards which 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 Policies 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 Whistle blowing 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.
- [Group Procurement Policy](#) communicates SSE's approach to procurement, including sustainable and ethical supply chains and modern slavery risk.
- [Sustainable Procurement Code](#) and accompanying [Supplier Guidance](#) document which describes the approach SSE takes to managing modern slavery in its supply chain and sets out its expectations of its supply chain partners.
- [SSE's 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.

Consideration within the Group Principal Risks

SSE's Group Principal Risks outline the core uncertainties the company must manage and mitigate to meet its strategic objectives. Human rights and modern slavery is considered within the Group Principal Risks, which are reviewed on an annual basis by the SSE plc Board. It is considered directly under the 'Large Capital Projects Quality' management, and indirectly within the 'People and Culture', 'Safety and Environment' and 'Politics, Regulation and Compliance' risks.

COLLABORATION AND PARTNERSHIPS

Powering Net Zero Pact

The Powering Net Zero Pact ("the Pact") is a new initiative created by SSE with 10 other founding partners as a legacy of COP26. The Pact aims to bring together companies across all tiers of the power sector globally, including civils, shipping, renewables, electrical engineering, and others, to achieve a fair and just energy transition to net zero. Over a six-month period, the 11 founding partner companies of the Pact – SSE and 10 strategic suppliers: Balfour Beatty; DEME Group; GE Renewables; Hitachi Energy; NKT; RJ McLeod; Siemens Energy; Siemens Gamesa; Subsea 7; and Vestas – met on a regular basis to agree areas of focus, shared commitments, and topics for future collaboration.

The Pact focuses on five areas of ambition: achieving net zero carbon emissions; protecting and enhancing the natural environment; transitioning to a circular economy; guaranteeing fair work and sustainable jobs; and adding value to local communities. Each area of ambition has a shared commitment and area for collaboration.

The Pact has committed to develop a targeted modern slavery and human rights abuse risk-based approach across global supply chains within the context of the commitment to 'guarantee fair work and sustainable jobs'. Progress made by the Pact's Modern Slavery Working Group will be reported in next year's report. For more details see <https://www.sse.com/sustainability/poweringnetzeropact/>

Supply Chain Sustainability School

In late 2020/21, SSE became a partner of the Supply Chain Sustainability School (SCSS), a subsidiary of Action Sustainability which is the consultancy that undertook the gap analysis of SSE's sustainable procurement approach in 2019/20 (see SSE's Modern Slavery Statement 2020 for more information.) SCSS is a collaboration between companies who have a mutual interest in building sustainability expertise and practices within their organisations and throughout their supply chain, and, as a partner, SSE and its suppliers can access a range of guidance, resources and CPD accredited training materials.

Modern slavery training and materials form an important part of the School's focus and resources, and SSE continued to work with the Supply Chain

Sustainability School over 2021/22 to run bespoke training for employees (see page 22), and used SCSS human rights and modern slavery resources to help project teams upskill on these subjects as part of embedding sustainability into its Large Capital Project governance process (see page 18).

SSE works in collaboration with other SCSS partners and suppliers through subject specific working groups run by the school, key examples being labour standards and social impact working groups which cover human rights, modern slavery, and labour standards. For more details see <https://www.sse.com/sustainability/poweringnetzeropact/>

Utilities Against Slavery

SSE was one of the first companies to join Utilities Against Slavery (previously Utilities Modern Slavery Working Group) which was set up in May 2020 by the Slave Free Alliance to drive forward collaborative action across the sector. Since then, 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. This is done by raising awareness, sharing best practice, and collaborating to minimise the duplication of effort by each company and by their shared supply chain.

Engaging with frameworks to improve transparency and approach

SSE is assessed by the CCLA and the Children's Human Rights Benchmark (CHRB) on its disclosure and management of human rights and modern slavery. SSE welcomes feedback and collaboration with experts and frameworks to improve its disclosure and progress its management and mitigation approach for human rights violations and modern slavery, and regularly complete relevant investor surveys disclosing workforce data and labour standards including the Workforce Disclosure Index (WDI), Moody's (Vigeo Eiris), CSA, and Sustainalytics. Over 2021/22, SSE engaged directly with the CCLA and the CHRB to better understand its scoring in their framework to help it make improvements to its human rights and modern slavery approach. The findings from this relating to disclosure and transparency are implemented in this report.

2021-2023 MODERN SLAVERY ACTION PLAN: YEAR ONE

In September 2020 human rights experts Stronger Together undertook a gap analysis of SSE's approach to human rights and modern slavery. That analysis formed the core of a three-year Modern Slavery Action Plan, starting in April 2021. The action plan is implemented across a number of business departments including Sustainability, Procurement, Safety, Health, and Environment (SHE), Large Capital Projects Quality, and Learning and Development, and SSE are continuing to work with Stronger Together on the areas of the plan that require specialist human rights expertise. The aim of the Modern Slavery Action Plan is to identify, manage, and reduce human rights and modern slavery, as well as raising awareness and improving education of human rights and modern slavery across the business. At 31 March 2022, SSE has completed its

first year of implementing the action plan.

The action plan has five key focus areas for the business. Progress against these over 2021/22 is detailed throughout this report.

Each focus area is sponsored by a member of SSE's Human Rights Steering Group, with the overall Action Plan underpinned by robust governance (see page 11). Over 2021/22, SSE set up a Human Rights Working Group, which reports into the Steering Group, and is responsible for driving the human rights and modern slavery actions forward that are detailed in the plan. To compliment this, a focus on collaboration and partnerships (see page 13) drive industry-level visibility and progress.

FIVE KEY FOCUS AREAS

1. Tier one and beyond: identifying and mitigating risk (pages 15-18)

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. This has been SSE's primary focus for progressing human rights risk mitigation over 2021/22.

2. Due Diligence (pages 19-20)

Ensuring SSE has the right systems to drive robust due diligence.

3. Messaging and Communications (page 21)

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 22)

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 23)

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

TIER ONE AND BEYOND: IDENTIFYING AND MITIGATING RISK

Identifying risks

Human rights and modern slavery risks come in many forms, are prevalent across different geographies, and materialise in a number of ways. SSE seeks to understand the most salient potential human rights and modern slavery risks for the utilities and electricity sector in which it operates, and works with its partners and suppliers continuously to identify and prevent occurrences. SSE has a low risk of human rights issues and modern slavery in its direct operations due to its adherence to UK law and robust due diligence of recruitment and operating standards. However, there is a potential risk in SSE's supply chain.

The salient human rights and modern slavery risks SSE looks out for are:

1. Working people on construction sites and vessels. Low skilled, low paid workers are more likely to be vulnerable to exploitation, and more likely to be recruited through a third party and from overseas, including from countries with a high risk of human rights violations and modern slavery, they are therefore vulnerable to exploitation.
2. Working people in the supply chains of assets SSE procures such as turbines, transformers, substation components, steel, and electrical components, as some components may be sourced from places with a high risk of modern slavery, or are created from raw materials sourced from high-risk countries and are in high-risk industries.
3. Working people in the supply chains of new technologies. Where markets are immature there is a risk that there is a less developed approach to the management of human rights. An example of this is solar and battery, as raw materials for these can be sourced from countries deemed high risk for modern slavery.
4. Within facilities management services such as catering, cleaning, security, and transport, working people may be recruited through third-party agencies for contingent workers, with less

transparency of working conditions and human rights protections.

5. Supply chain workers in countries with less robust legal protections are vulnerable to exploitation, for example, in places where the use of recruitment fees continues to be legal. SSE has a firm policy against the use of recruitment fees and, since 2020, has implemented a clause in its supplier contracts to ensure this does not take place within any tier of its supply chain.

SSE takes steps to identify human rights and modern slavery risks in its operations and supply chain by carrying out annual desk-top assessments, deep dive assessment for business areas of potential high risk, and by engaging directly with suppliers to manage tier one risk and potential risks further down the supply chain. More details on how SSE identifies and manages the salient human rights and modern slavery risks are outlined on the following pages.

Desk-based risk assessment of tier 1 expenditure

Over 2021/22, 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 depending on the suppliers industry and country-of-origin, which is based on 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.

The 2021/22 assessment mapped just under £4.5bn of expenditure and showed that:

- 51% of supply chain expenditure fell into categories with a low risk
- 38% fell into categories with a medium risk
- 1% fell into categories with a high risk
- 10% of expenditure could not be allocated to a category, this is an improvement from 12% in 2021, and SSE is continuing to work on improving data allocation.

This process forms part of a wider extensive annual sustainability risk assessment, designed to

measure risk in the supply chain against seventeen sustainability metrics defined as material to SSE. As a result, a heat map identified the areas where the most material risks lie, enabling SSE to manage these. The findings inform supplier engagement, influence risk based tender criteria, and improve performance management of the supply chain.

Working with strategic suppliers to understand risk

While SSE's desk-based risk assessment is useful for providing some understanding of the risk profile of SSE's supply chain, SSE recognises that this approach can only provide a partial view of modern slavery risk. SSE's tier one expenditure does not reflect the full supply chain of some of the goods it purchases, for example higher value asset components which are often manufactured overseas and have complex multi-national supply chains.

SSE has an established Supplier Relationship Management (SRM) programme, in operation for over a decade, with 34 suppliers who are key to the growth and success of SSE's business ambitions. Over 2021/22 SSE has engaged with these suppliers via monthly delivery partner forums with individual focus areas on sustainability, innovation, and engineering. These sessions feed into quarterly senior management discussions. Over 2021/22 more than 60 sessions have taken place, facilitating focused discussions on company strategy, current performance, and future growth ambitions.

Undertaking deep dive risk assessments for potential high-risk areas of the business

In 2021/22 SSE appointed Stronger Together to undertake an independent assessment for two wind farms currently in construction. These assessments, one completed and one in progress, reviewed tier one, two, and three suppliers to assess the risk of human rights abuses based on their geographical location and the goods and services they provide to SSE. The objective was to understand the processes and practices in place to mitigate human rights risk and to identify potential risks and gaps in the suppliers approach to modern slavery risk and compliance with UK law.

A desk-based risk assessment of four tier one suppliers and 40 tier two and three suppliers took place for the first assessment, along with interviews between Stronger Together, SSE's procurement team, and key suppliers. Stronger Together looked at country of origin, industry sector and business profile to provide a risk rating. Materials used in products procured were also assessed for risk using the same approach. The same approach is currently being rolled out for the second assessment. These deep dive assessments help SSE identify where risks may lie for wind projects, and findings can be used to support other projects in the future.



PREPARING FOR POTENTIAL HIGH RISK EARLY IN THE PROJECT PROCESS

SSE's Distributed Energy business is pursuing growth opportunities in utility-scale solar generation and battery storage in the UK. SSE is aware that human rights abuses and modern slavery risks, that have not yet been prevalent across the rest of SSE's business, may emerge in both solar and battery supply chains.

To ensure risks are identified and managed as early as possible, SSE Distributed Energy has prioritised the management of human rights and modern slavery at the initiation stage of project development by taking action to increase its awareness of the types of risks that may occur, identify risks, and be able to act on any risks uncovered.

Recognising that the challenge is not just one for SSE, but one for the industry as a whole, SSE Distributed Energy has joined Solar Energy UK (SEU) and become a member of its Supply Chain Task Group to increase visibility of risk and collaborate with others to mitigate it. SEU and Solar Power Europe (SPE) have contracted an extensive industry-level Supply Chain Monitoring programme, of which SSE Distributed Energy have financially contributed. This programme aims to assess the various tiers of a solar supply chain on an environmental, social, and governance (ESG) criteria, with the initial focus to be on modern slavery and traceability.

Whilst this work is ongoing at an industry level, SSE Distributed Energy is acting now to identify and mitigate risks in the supply chain – in advance of contracts being awarded – for its first large-scale solar project at Littleton Farm. Over 2021/22, SSE Distributed Energy appointed human rights experts Slave Free Alliance to carry out a review of the prospective suppliers for the Littleton project, in advance of awarding contracts they will conduct interviews with the supplier shortlist, and once the contract has been awarded will carry out on-site audits.

In addition, SSE Distributed Energy has implemented extensive risk-based tender questions in all live tender events for prospective suppliers, with additional questions asked around the sourcing of specific high-risk elements. This enables SSE Group and SSE Distributed Energy procurement teams to analyse the risk of human rights violations and modern slavery ahead of contracts being awarded.

Mitigating risks

SSE takes steps to prevent human rights abuses and modern slavery in its operations and supply chain by developing a sustainable procurement strategy which is focused on mitigating risks, ensuring that expectations and requirements of its suppliers are clearly stated in codes, policies and tender questions, and developing frameworks to enable project teams to identify and mitigate risks throughout the project development process. The strategy, code, and processes are updated accordingly to include any potential gaps or new risks that are uncovered as SSE moves into new territories.

Mitigating risk through a sustainable supply chain strategy

In 2021 SSE undertook a gap analysis, with experts Action Sustainability, against ISO 20400 standard for sustainable procurement. This led to the

development of a three-part strategy to achieve a mature sustainable procurement model:

1. Develop and maintain a detailed analysis of sustainability risk and opportunity across SSE's procurement categories and sub-categories;
2. Use the risk and opportunity assessment to inform questions asked of prospective suppliers at all procurement stages including the setting of appropriate contract clauses and associated KPIs; and,
3. Integrate sustainability prominently and with clear deliverables into recruitment, job descriptions and performance review processes and develop training to support this objective.

SSE has been focused on embedding these as business as usual over 2021/22, with sustainability considerations, including human rights and modern

slavery, factored into each stage of the supplier selection process. Pre-qualification and tender questions based on category, risk, and contract value have been integrated into the new sourcing tool, ensuring that sustainability is considered throughout SSE's supply chain.

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](https://www.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 page 3-4).

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

In addition to adhering to the code, all potential new suppliers must register on SSE's Supplier Registration System (SRS) which includes sign-on to SSE's Sustainable Procurement Code. 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.

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

As part of a refresh of SSE's large capital projects (LCP) governance framework (see page 53 of SSE's Sustainability Report 2022), SSE has developed a process for project teams to manage sustainability risk on projects from the initial concept, design, and engineering stage, through to construction, operation, and decommissioning.

From 1 April 2022, a Sustainability Assessment and Action Plan (SAAP) is required for all of SSE's large capital projects. A key component is the identification and mitigation of human rights and modern slavery risk on the project site and in the supply chain. Guidance, training, and additional resources have been developed for project teams to increase their awareness of human rights and modern slavery and help them identify key areas of risk to incorporate in their action plans. SSE have partnered with the Supply Chain Sustainability School to deliver training, see page 22 for details.



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 2021/22, 58.2% of SSE's total direct workforce were covered by collective bargaining agreements. The Joint Agreement, covering 54.2% 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 sets the tone for its employee culture. SSE has been a committed 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 first 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 both pay the real Living Wage and commit to provide at least four weeks' notice for every shift, with guaranteed payment if shifts are cancelled within this notice period. Living Hours employers also 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 three years, supporting the Living Wage Foundation to develop this new and important standard. Like with the Living Wage, SSE believes that the biggest impact of Living Hours will come through the changes made for those that work regularly on its sites.



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:

Modern Slavery Clause

SSE's Modern Slavery Clause has been included in all new goods, services and works contracts issued since 2016. Over 2021/22 SSE has been updating the clause based on the recommendation from human rights experts, Stronger Together, to include additional, broader auditing rights. 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. As noted on page 23, individuals working on SSE's behalf are able to access SSE's whistleblowing channels.

Living Wage Clause

SSE's Living Wage Clause has been included in all new services and works contracts issued since 2014. It requires that 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. Over 2020/21, SSE has progressed with updating this clause to a new Living Wage and Living Hours Clause to reflect its Living Hours commitment across its supply chain. This will be rolled out across SSE's supply chain over 2022/23.

The completion of a checklist by SSE's procurement department ensures that suppliers are properly registered and that 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.

On-site checks and audits

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 (see page 60 of SSE's Annual Report 2022 for details on labour standards).

SSE has a large and evolving supply chain which supports the ongoing project portfolio. As part of SSE's Large Capital Projects (LCP) Quality assurance programme, scheduled and regular on-site audits are conducted on the designated Principal Contractor to ensure both they and their supporting supply chain are meeting the standards expected by SSE. SSE has a modern slavery checklist as part of these audits to ensure compliance on-site with SSE's modern slavery requirements.

SSE has commissioned Stronger Together to undertake on-site human rights and modern slavery assessments at three of its project construction sites. Over 2021/22 two out of three on-site assessments took place, with the third scheduled to take place in July 2022. The assessments involve Stronger Together engaging with the principal contractors on site, to speak to workers directly and privately, to check working conditions and for the signs of modern slavery amongst workers, to better understand processes and procedures for identifying modern slavery, whistleblowing, and responding to instances of modern slavery (see page 23 for SSE's group wide response and doing the right thing process). These site visits provided SSE with a better understanding of how to identify modern slavery on site, including considerations when speaking with workers directly.

MESSAGING AND COMMUNICATIONS

Clear guidelines for business ethics

SSE's Doing the Right Thing guide to good business ethics is a guide which 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

Over 2021/22 SSE increased communications on human rights and modern slavery as part of its modern slavery action plan. Key initiatives included developing a human rights and modern slavery focused communications plan with the objective of regularly reaching employees to raise awareness of human rights and modern slavery, provide education on how to spot the signs, and outline what steps to take if human rights violations or modern slavery is suspected, including whistleblowing channels and contact details for relevant authorities such as the police and Gangmasters Labour Abuse Authority (GLAA). These articles are hosted permanently on SSE's internal SafetyNet platform and are linked to in weekly SHE (Safety, Health, and Environment) email bulletins sent to all employees. The communications plan was also used to increase awareness of human rights and modern slavery related training available to employees (see page 22 for details).

As well as internal communications, SSE collaborates with key partners to raise awareness of modern slavery and human rights. In 2021/22 SSE spoke at a joint event, hosted by the Supply Chain Sustainability School, in collaboration with the Utilities Modern Slavery Working Group. The session focused on combatting Modern Slavery in the Utilities sector. SSE alongside Slave Free Alliance and United Utilities outlined the plans in place to support an aligned and collaborative supply chain approach to successfully combat the risks of modern slavery.



AWARENESS AND EDUCATION

SSE increased momentum behind training and education in 2021/22, with the aim of ensuring everyone working for SSE is aware of human rights and modern slavery, that those in job roles most likely to be able to identify and flag modern slavery have access to relevant, bespoke training, and worked with principal suppliers to identify training and knowledge gaps.

Raising awareness across the workforce

As part of SSE's partnership with the Supply Chain Sustainability School, in 2021/22 SSE ran a voluntary learning session open to all employees on modern slavery. This provided an overview of modern slavery, what modern slavery is, how to spot the signs, and how to understand the risks of slavery within the supply chain. This training was recorded and is hosted on SSE's internal Sharepoint for employees to access at any time. 42 employees attended.

In addition, SSE ran a Climate Academy in partnership with the Supply Chain Sustainability School, in which one of the 5 sessions was dedicated to educating employees on how climate change is and will affect people around the world, in particular highlighting that human rights violation and modern slavery is likely to increase due to more people being placed into vulnerable circumstances due to climate change. 286 employees attended.

Building knowledge for those closest to SSE's supply chain

SSE's Learning and Training team completed a learning needs analysis in 2021/22 to identify the employees in roles that are most likely to be able to spot potential cases of modern slavery. This discovered procurement professionals and project managers work closest to SSE's supply chain, where the risk of modern slavery is greatest. The team developed bespoke training for these two roles with the Supply Chain Sustainability School (SCSS). The training will be tracked by the SCSS to monitor the number of people who have completed the training.

In addition, as part of SSE's work over 2021/22 to embed sustainability into large capital projects (LCPs), human rights and modern slavery was included as a key criterion in the project

sustainability risk assessment and action plan (see page 18 for details). To help them navigate this requirement SSE provided a number of human rights and modern slavery resources, guidance, and links to training by the SCSS, Stronger Together, and other trusted sources, within a 'Sustainability for LCPs work instruction'.

Engaging with suppliers to understand training gaps

SSE worked with principal suppliers on major project sites to understand training gaps regarding human rights and modern slavery. This included Keadby 2, Ferrybridge D&D, Slough multifuel, Shetland HVDC and Viking Wind Farm, involving principal suppliers Siemens, Keltbray, HZI, BAM Nuttall and R.J. McLeod respectively. All parties were found to have a high standard of awareness of human rights and modern slavery, and provide training via inductions and online guidance for their workforces. SSE will continue to engage with principal suppliers as they are contractually engaged.



RESPONSE AND DOING THE RIGHT THING

Reporting wrongdoing

Speaking 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 is 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 31. 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 GEC and the Board.

In SSE's 2021 employee engagement survey, 84% of employees said that they would report wrongdoing without worrying that it would have a negative impact on them (+5% compared to the Energy and Utilities norm and +1% compared to the UK norm). Over calendar year 2021, there were 52 reports of wrongdoing made through SSE's speak up channels, a decrease from 66 in 2020 which is understood to be driven primarily by the impacts of Covid-19. A breakdown of what these whistleblowing incidents related to can be found on page 62 of SSE's Annual Report 2022. None of these incidents related to suspected instances of modern slavery or human rights abuses. SSE's Modern Slavery Clause (see page 20) 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.

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 whistleblowing reports made over 2021 can be found in the on Page 62 of the SSE 2022 Annual Report.

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 after-care programme for those people that make contact through its speak up channels, and has been working over 2021/22 to implement this earlier in the process to increase uptake. This is designed to gain feedback and improve future processes to further support employees to speak up. In 2021, SSE issued 83 after-care surveys and received 4 responses which are being used to inform SSE's processes and practices.

Formalising the Response and Doing The Right Thing framework

SSE has robust whistleblowing channels and procedures in place. Following advice from the Supply Chain Sustainability School, Stronger Together, and a review of other organisations' approaches, SSE identified it required a more formalised framework for its response plan to actual or potential human rights abuses. This formalised process will enable those who work for, or on behalf of, SSE to access and understand the whistleblowing, response, and remediation processes in place. Over 2021/22 a 'Response and doing the right thing' plan has been developed. It is designed to align with SSE's Doing the Right Thing approach, 'Listen, Act, Protect', and covers:

- Listen: whistleblowing channels, gathering information and evidence,
- Protect: protecting and safeguarding victims, learning and future prevention
- Act: escalating issues externally, and internally, and response and doing the right thing.

PRIORITIES FOR 2022/23

SSE has identified 5 key priorities for 2022/23 to further develop its approach to human rights violations and modern slavery risk mitigation, in line with its 2021-23 Modern Slavery Action Plan and the recommendations from Stronger Together. Progress will be reported on within SSE's Human Rights and Modern 2023.

- Continue on-site audits and assessments.
- Advance understanding and mitigation of risk for solar and battery, and other emerging technologies.
- Increase employees' understanding of human rights and modern slavery risk and their ability to manage this risk in their roles through bespoke training and working with project teams on risks assessments and action plans.
- Develop a process for managing risks with Joint Ventures and as SSE expands its business, including activity overseas.
- Continue to work on implementing the 'Response and Doing The Right Thing' process.



BUSINESSES COVERED BY THE SSE HUMAN RIGHTS AND MODERN SLAVERY STATEMENT 2022

COMPANY	COUNTRY OF INCORPORATION	2022 HOLDING %	PRINCIPLE ACTIVITY
Abernedd Power Company Limited	England and Wales	100	Holding Company
Airtricity Windfarm Finance Limited	Ireland	100	Holding Company
Arklow Offshore Phase II Company Limited	Ireland	100	Dormant
Beatrice Offshore Windfarm Limited	Scotland	40.0	Power Generation
Beithe (HK) Limited	Hong Kong	100	Holding Company
Beithe AG	Switzerland	100	Holding Company
Berwick Bank Wind Holdings Limited (formerly Seagreen Charlie Wind Energy Limited)	England and Wales	100	Holding Company
Berwick Bank Wind Limited (formerly Seagreen Foxtrot Wind Energy Limited)	England and Wales	100	Power Generation
Bhlaraidh Wind Farm Limited	Scotland	100	Power Generation
Bindoo Windfarm (ROI) Limited	Ireland	100	Power Generation
Brickmount Limited	Ireland	100	Power Generation
Building Automation Solutions Limited	England and Wales	100	Dormant
Clyde Windfarm (Scotland) Limited	Scotland	50.1	Power Generation
Coire Glas Hydro Pumped Storage Limited	Scotland	100	Power Generation
Comhlacht Gaoithe Teoranta	Ireland	100	Power Generation
Coomacheo Wind Farm Limited	Ireland	100	Power Generation
Coomatallin Windfarm (ROI) Limited	Ireland	100	Power Generation
Curragh Mountain Windfarm Limited	Ireland	100	Power Generation
Dedondo Limited	Ireland	100	Power Generation
Dromada Windfarm (ROI) Limited	Ireland	100	Power Generation
Drumnahough Wind Farm Designated Activity Company	Ireland	100	Power Generation
Dunmaglass Wind Farm Limited	Scotland	50.1	Power Generation
Fibre Fuel Limited	England and Wales	100	Dormant
Fibre Power (Slough) Limited	England and Wales	100	Power Generation
Forbury Assets Limited	England and Wales	100	Construction of utility projects
Fusion Heating Limited	Northern Ireland	100	Energy Related Services
Galway Wind Park Phase 3 Designated	Ireland	100	Renewable Development
Ganderoy Limited	Ireland	100	Power Generation
Gartnaneane Limited	Ireland	100	Power Generation
Greater Gabbard Offshore Winds Limited (GGOWL)	England and Wales	50.0	Power Generation
Green Wind Energy (Wexford) Limited	Ireland	100	Renewable Development
Griffin Wind Farm Limited	Scotland	100	Power Generation
Hadyard Hill Wind Farm Limited	Scotland	100	Power Generation
Hydro Electric Pension Scheme Trustees Limited	Scotland	100	Dormant
Keadby Developments Limited	England and Wales	100	Dormant

COMPANY	COUNTRY OF INCORPORATION	2022 HOLDING %	PRINCIPLE ACTIVITY
Keadby Generation Limited	England and Wales	100	Power Generation
Keadby Wind Farm Limited	England and Wales	100	Power Generation
Leanamore Wind Farm Limited (formerly Ahalia Holdings Limited)	Ireland	100	Power Generation
Lenalea Wind Farm Designated Activity Company	Ireland	100	Renewable Development
Limerick West Windfarm Limited	Ireland	100	Power Generation
March Winds Limited	Ireland	100	Power Generation
Marr Bank Wind Holdings Limited (formerly Seagreen Golf Wind Energy Limited)	England and Wales	100	Holding Company
Marr Bank Wind Limited (formerly Seagreen Delta Wind Energy Limited)	England and Wales	100	Power Generation
Medway Power Limited	England and Wales	100	Power Generation
Meentycat Limited	Ireland	100	Power Generation
Milane Holdings Limited	Ireland	100	Dormant
Mullananalt Wind Farm (ROI) Limited	Ireland	100	Power Generation
Platin Power Limited	Ireland	100	Dormant
Power from Waste Limited	England and Wales	100	Dormant
Richfield Windfarm (ROI) Limited	Ireland	100	Power Generation
Scottish and Southern Energy Power Distribution Limited	Scotland	100	Holding Company
Scottish Hydro Electric Power Distribution plc	Scotland	100	Power Distribution
Scottish Hydro Electric Transmission plc	Scotland	100	Power Transmission
Slough Domestic Electricity Limited	England and Wales	100	Power Generation
Slough Electricity Contracts Limited	England and Wales	100	Electricity Contracting
Slough Energy Supplies Limited	England and Wales	100	Dormant
Slough Heat & Power Limited	England and Wales	100	Power Generation
Slough Utility Services Limited	England and Wales	100	Utility Services
Stronelaig Wind Farm Limited	Scotland	50.1	Power Generation
Southern Electric Power Distribution plc	England and Wales	100	Power Distribution
SSE Airtricity Limited	Ireland	100	Energy Supply
SSE Airtricity Distributed Energy Limited	Ireland	100	Power Distribution
SSE Airtricity Energy Services (NI) Limited	Northern Ireland	100	Energy Supply
SSE Airtricity Energy Services Limited	Ireland	100	Energy Supply
SSE Airtricity Energy Supply (NI) Limited	Northern Ireland	100	Energy Supply
SSE Airtricity Gas Limited	Ireland	100	Energy Supply
SSE Airtricity Gas Supply (NI) Limited	Northern Ireland	100	Energy Supply
SSE Airtricity Utility Solutions Limited	Ireland	100	Utility Contracting
SSE Beatrice Offshore Windfarm Holdings Limited	Scotland	100	Holding Company
SSE Contracting Group Limited	England and Wales	100	Holding Company
SSE Contracting Limited	England and Wales	100	Contracting
SSE Cumarsáid Teoranta	Ireland	100	Telecommunications
SSE E&P UK Limited	Scotland	100	Gas Production
SSE Energy Supply Limited	England and Wales	100	Energy Supply
SSE Enterprise Limited	England and Wales	100	Corporate Services
SSE EPM Limited	England and Wales	100	Energy Trading
SSE Galloper Offshore Windfarm Holdings Limited	England and Wales	100	Holding Company
SSE Generation Ireland Limited	Ireland	100	Power Generation
SSE Generation Limited	England and Wales	100	Power Generation

COMPANY	COUNTRY OF INCORPORATION	2022 HOLDING %	PRINCIPLE ACTIVITY
SSE Group Limited	Scotland	100	Dormant
SSE Heat Networks (Battersea) Limited	England and Wales	100	Dormant
SSE Heat Networks Limited	Scotland	100	Utility Services
SSE Hornsea Limited	England and Wales	100	Gas Storage
SSE Insurance Limited	Isle of Man	100	Insurance
SSE Maple Limited	England and Wales	100	Investment Holding
SSE Medway Operations Limited	England and Wales	100	Holding Company
SSE Micro Renewables Limited	Scotland	100	Energy Related Services
SSE Multifuel Generation Holdings Limited	England and Wales	100	Holding Company
SSE OWS Glasgow Limited	Scotland	100	Property Holding
SSE Production Services Limited	England and Wales	100	Maintenance Services
SSE Renewables (Ireland) Limited	Ireland	100	Holding Company
SSE Renewables Developments (Germany) GmbH	Germany	100	Renewable Development
SSE Renewables Generation Ireland Limited	Ireland	100	Power Generation
SSE Renewables Holdings (Europe) Limited	Ireland	100	Holding Company
SSE Renewables Holdings (UK) Limited	Northern Ireland	100	Holding Company
SSE Renewables Holdings Germany GmbH	Germany	100	Dormant
SSE Renewables Holdings Limited	Ireland	100	Holding Company
SSE Renewables International Holdings	Scotland	100	Holding Company
SSE Renewables Limited	Scotland	100	Holding Company
SSE Renewables Off Shore Limited	Ireland	100	Holding Company
SSE Renewables Offshore Windfarm Holdings Limited	Scotland	100	Holding Company
SSE Renewables Onshore Windfarm Holdings Limited	Northern Ireland	100	Holding Company
SSE Renewables UK Limited	Northern Ireland	100	Power Generation
SSE Renewables Services (UK) Limited (formerly SSE Renewables Developments (UK) Limited)	Northern Ireland	100	Renewable Development
SSE Renewables Walney (UK) Limited	England and Wales	-	Holding Company
SSE Renewables Wind (Ireland) Holdings Limited	Ireland	100	Holding Company
SSE Renewables Wind Farms (Ireland) Limited (formerly Airtiricity Europe Windfarm Holdings Limited)	Ireland	100	Power Generation
SSE Renewables Wind Farms (UK) Limited	Scotland	100	Power Generation
SSE Retail Limited	Scotland	100	Energy Related Services
SSE Seabank Investments Limited	England and Wales	100	Dormant
SSE Seabank Land Investments Limited	England and Wales	100	Dormant
SSE Services plc	England and Wales	100	Corporate Services
SSE Slough Multifuel Holdco Limited	England and Wales	100	Power Generation
SSE Southern Group Trustee Limited (Previously Southern Electric Group Trustee Limited)	England and Wales	100	Dormant
SSE Stock Limited	Scotland	100	Stock Holding
SSE Thermal Energy Holdings Limited	England and Wales	100	Holding Company
SSE Thermal Energy Operations Limited	England and Wales	100	Power Generation
SSE Thermal Generation (Scotland) Limited	Scotland	100	Power Generation
SSE Thermal Generation Holdings Limited	England and Wales	100	Holding Company
SSE Toddleburn Limited	Scotland	100	Power Generation

COMPANY	COUNTRY OF INCORPORATION	2022 HOLDING %	PRINCIPLE ACTIVITY
SSE Trading Limited	England and Wales	100	Energy Trading
SSE Trustees Limited	England and Wales	100	Dormant
SSE Utility Services Limited	England and Wales	100	Dormant
SSE Utility Solutions Limited	England and Wales	100	Utility Services
SSE Venture Capital Limited	Scotland	100	Investment Holding
SSE Viking Limited	England and Wales	100	Renewable Development
SSE(SE) Quest Trustee Limited (Previously Southern Electric Quest Trustee Limited)	England and Wales	100	Dormant
SSEPG (Operations) Limited	England and Wales	100	Power Generation
Strathy Wind Farm Limited	Scotland	100	Power Generation
Sure Partners Limited	Ireland	100	Renewable Development
Tealing Solar Park Limited	England and Wales	100	Construction of utility project
TESGL Limited	England and Wales	100	Building Energy Management
The Energy Solutions Group Bidco Limited	England and Wales	100	Dormant
The Energy Solutions Group Midco Limited	England and Wales	100	Dormant
The Energy Solutions Group Topco Limited	England and Wales	100	Dormant
Tournafulla Windfarm (ROI) Limited	Ireland	100	Power Generation
Viking Energy (Scottish Partnership)	Scotland	100	Renewable Development
Viking Energy Wind Farm LLP	Scotland	100	Renewable Development