- Collective transport
- Labour flexibility
- Training
- Videoconferences
- Promoting cycling
- Parking management
- Carpooling, which allows employees to publish their journeys and offer their vehicle to share the trips

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?
Direct engagement with policy makers
Trade associations
Funding research organizations
Other

C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

<table>
<thead>
<tr>
<th>Focus of legislation</th>
<th>Corporate position</th>
<th>Details of engagement</th>
<th>Proposed legislative solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory carbon reporting</td>
<td>Support</td>
<td>ISO 14064 external verification since 2010. Participation in European Commission pilot project.</td>
<td>Carbon reporting should be compulsory for big companies.</td>
</tr>
<tr>
<td>Cap and trade</td>
<td>Support</td>
<td>Iberdrola participates in the EU ETS. As a stakeholder, Iberdrola plays an active role in the EU regulatory dialogue regarding cap and trade structural design and rules, specifically in the review of the Directive of the EU-ETS and in the Effort Sharing Decision. Iberdrola is also member of the Carbon Pricing Leadership Coalition, a multilateral partnership, that promotes robust carbon pricing mechanisms as a climate action tool.</td>
<td>Recognition of the important role of cap&amp;trade to tackle the decarbonisation of EU energy model. In the context of EU ETS, long term goals are essential to provide a CO2 price which consolidates as a signal to the investment in low carbon technologies. A strong carbon price signal able to encourage investments in decarbonisation. To reinforced this signal, through a carbon price floor should be explored to bring visibility and stability to investors.</td>
</tr>
</tbody>
</table>
where there are carbon price instruments equivalent to a carbon tax (EU ETS, carbon price floor in UK...). Iberdrola is also member of the Carbon Pricing Leadership Coalition, a multilateral partnership, that promotes robust carbon pricing mechanisms as a climate action tool. Reform, which would cover all sectors, including transport and heating; cooling. Part of the Transport sector (road transport, diesel rail and inland waterway, which cover 33% of the non ETS emissions) is not so far covered by EU ETS. This sector currently contributes to a quarter of the total EU GHG emissions and its share its growing since this is the only EU sector where the emissions have risen since 1990. At the same time, some of the energy sources of heating; cooling are not covered by the EU ETS, despite of the fact that it represents the highest share final energy consumption in EU (over 50%).

<table>
<thead>
<tr>
<th>Energy efficiency</th>
<th>Support</th>
<th>Iberdrola has created its own Energy Services Company (ESCO), to deploy specific actions in the field of efficiency, together with other suppliers in Iberdrola Group who plays and active role in the regulatory dialogue at international and national level.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy efficiency</td>
<td><strong>Support</strong></td>
<td>Energy efficiency (EE) is one of the main targets to tackle energy model challenges. Electrification of economy is the most important element for the improvement of energy efficiency, due to competitive and technical advantages of the electricity sector to introduce EE measures. Energy price signal (e.g. taxation), information, and standards are proved to be the most efficient and effective tools to mitigate barriers and market failures that prevent market to provide the optimal level of energy efficiency investments.</td>
</tr>
<tr>
<td>Clean energy generation</td>
<td>Support</td>
<td>Iberdrola was founded at the beginning of the past century based on hydroelectric power and 17 years ago pre-empted the rest of the sector with a focus on renewables that has made it world leader in wind power and pioneer in measures to combat climate change.</td>
</tr>
<tr>
<td>Clean energy generation</td>
<td><strong>Support</strong></td>
<td>Iberdrola is one of the largest electricity companies in the world and a global leader in wind power. We have achieved this position by strengthening our commitment to sustainable development and care for the environment using cleaner technologies with the lowest CO2 emission levels. The Company proposes an efficient energy mix, based on efficient renewable energy, combined cycle gas turbines, and nuclear. Iberdrola current energy mix is 68% free of carbon emissions and plans to reduce by 50% emissions in 2030 vs. 2007 and become carbon neutral in 2050.</td>
</tr>
<tr>
<td>Adaptation or resilience</td>
<td>Support</td>
<td>Iberdrola plays and active role in the regulatory dialogue at international and national level. Building on previous engagements like the collaboration with the United States Department of Energy’s (DOE) Partnership for Energy Sector Climate Resilience program, or in the UK the Adaptation Reporting Power, Iberdrola is following the EU regulatory dialogue regarding the review of the EU adaptation strategy, as well as contributing with its views to the development of the new Spanish National Adaptation Plan.</td>
</tr>
<tr>
<td>Adaptation or resilience</td>
<td><strong>Support</strong></td>
<td>Governments should set global strategies to promote adaptation resilience across all economy sectors. Iberdrola’s contribution to the new Spanish National Adaptation Plan and the EU adaptation strategy has highlighted the relevance of providing accessible and user friendly tools in order to get homogeneous information on climate scenarios and common metrics that allow a comparison between regions as well as risks prioritization. In addition, for better addressing extreme events, an area of analysis shall be global (systemic) action plans versus individual action at asset level to understand effectiveness and efficiencies achieved. Furthermore, the need of specific financial instruments that encourage investment, especially in the private sector, where measures such as direct subsidies or favourable taxation has been also included. The relevance of the energy sector in the new energetic context and its contribution to socio-economic resilience has been strongly highlighted.</td>
</tr>
<tr>
<td><strong>finance</strong></td>
<td><strong>regulatory dialogue at international and national level.</strong></td>
<td>**climate change. Iberdrola is fully involved in the main policy conversations to promote sustainable finance. It is especially remarkable the participation of Iberdrola in the Technical Expert Group on Sustainable Finance at EU, that has been deeply involved in the developing on the EU taxonomy for climate change mitigation and climate change adaptation. Additionally, Iberdrola has been really involved in working groups that support ambitious approaches on sustainable finance within its activities in organizations such as OECD, UN Global Compact or Corporate Leaders Group. Within climate advocacy activities, it was especially remarkable the leadership of the company in the Climate Summit of the Secretary General of the United Nations in New York in September 2019, engaging at the highest level with the main action streams (mitigation, energy transition, just transition…) and joining some of the most relevant pledges such as the Business Ambition 1,5°C declaration, aimed at aligning business activities with limiting global temperature rise to 1.5°C above pre-industrial levels, and the Just Transition and Decent Jobs Pledge, encouraging companies to following ILO core labour standards with respect to our own employees, and use contractors who also comply with these standards.</td>
</tr>
<tr>
<td><strong>Other, please specify (Assumption Environmental costs internally)</strong></td>
<td><strong>Support</strong></td>
<td><strong>Some of these principles have not been fully adopted in some of the countries in which it operates and are the subject of a social debate, in which Iberdrola participates, for their possible inclusion in regulations.</strong></td>
</tr>
<tr>
<td><strong>Other, please specify (Carbon Pricing)</strong></td>
<td><strong>Support</strong></td>
<td><strong>Iberdrola is member of Carbon Pricing Leadership Coalition - CPLC (World Bank) and participated in the Carbon Pricing Corridors project (promoted by CDP, We Mean Business and the Carbon Pricing Leadership Coalition) that, provided market insights into the future impact of carbon pricing and explored the carbon-related price signals that would decarbonize electricity generation and heavy industry. We believe that is necessary to put in place the right incentives, in electricity and in all other sectors, to invest and consume in low carbon technologies. This will move from the current model that rewards polluters to a new system based on the principle “polluter pays”. The most efficient tool to achieve this goal is putting a price on carbon, as it provides technology-neutral incentives and promotes the cheapest clean production sources.</strong></td>
</tr>
<tr>
<td><strong>Other, please specify (Climate Action Summit)</strong></td>
<td><strong>Support</strong></td>
<td><strong>Leadership in the Climate Action Summit organized by the UN Secretary General in September 2019</strong></td>
</tr>
</tbody>
</table>
Iberdrola was one of the leading companies that endorsed the European Green Deal and the EU climate neutrality target by 2050, co-organizing a high level event at COP 25 in Madrid with European Commission and CLG Europe, with the participation of Vice-president Timmermans and Iberdrola’s, Chairman and CEO. Within the roadmap towards climate neutrality, Iberdrola has advocated for an ambitious approach to fully decarbonize the energy sector at EU level by 2050 as a source of opportunities. In collaboration with the Afry consulting group, it has been developed (during 2019 & 2020) a thorough assessment of this transition towards a decarbonized energy sector at EU level. This report was launched at a high level webinar with the participation of the European Commission, co-organized with Euractiv in June 2020.

C12.3b

(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?
Yes

C12.3c

(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.

**Trade association**
Eurelectric

*Is your position on climate change consistent with theirs?*
Mixed

*Please explain the trade association’s position*
Eurelectric in Europe, decarbonisation in 2050.

*How have you influenced, or are you attempting to influence their position?*
We are participating focused on clean energy promotion instead of the general rule of coal generation in Europe. Members of Groups relating Climate Change are committed to design the energy roadmap in order to decarbonise European utilities.

**Trade association**
Transparency Register

*Is your position on climate change consistent with theirs?*
Consistent

*Please explain the trade association’s position*
**How have you influenced, or are you attempting to influence their position?**
In February 2012, Iberdrola registered within the Transparency Register. Existence of government and regulatory support mechanisms to facilitate the implementation of these programmes and help achieve the global targets. The company is also engaged by the input from expert stakeholders to the sustainability report.

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**Trade association**
Club de Excelencia en Sostenibilidad

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
Created by leading corporations in order to point out the public authorities best practices regarding sustainability issues: GHG emissions, mobility, biodiversity and energy efficiency projects...

**How have you influenced, or are you attempting to influence their position?**
We have participated in all the publications and we have coordinated within the institutions several Working Groups. The most recent is the Biodiversity Catalogue.

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**Trade association**
Call of eight leading energy companies to EU leaders for a revitalized energy policy

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
The eight energy companies agreed on a joint statement to underline the seriousness of the current challenges facing European carbon market able to support climate-friendly technologies and in which a reliable perspective is provided, notably, by establishing ambitious but realistic and stable post-2020 greenhouse gas emissions targets.

**How have you influenced, or are you attempting to influence their position?**
Iberdrola has supported the event. Information published in Iberdrola's webpage.

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**Trade association**
Grupo español de Crecimiento Verde

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
The aim of this Group is increasing participation of companies, sharing information, identifying opportunities and supporting Spanish presence in international forums. Main spanish companies belong to this Group which was created by the Spanish Ministry for Agriculture, Alimentation and Environment.

**How have you influenced, or are you attempting to influence their position?**
Iberdrola is present in this Group since its creation on September 2014. It is one of the few utilities present. Iberdrolaholds the vice-presidency of the Group and coordinates the climate plicty working
Is your position on climate change consistent with theirs? Consistent

Please explain the trade association's position
Iberdrola reaffirmed its unwavering commitment to combating climate change at the Climate Change Summit organised by the United Nations in New York in September 2014. In this regard, the company endorsed the goals set by CDP via its Road to Paris 2015 initiative, which aims to ensure that more ambitious and binding measures will be taken by States at the Climate Summit scheduled for the French capital.

How have you influenced, or are you attempting to influence their position?
Iberdrola, when attending the New York Climate week in September 2014, signed the basic purposes of this initiative and has joined the effort in order to go on bringing down greenhouse gas emissions, limit global warming to less than 2°C Celsius and promoting transparency in the reporting.

Is your position on climate change consistent with theirs? Consistent

Please explain the trade association's position
By bringing companies together with relevant experts and stakeholders, Global Compact LEAD provides a collaborative space to generate and implement advanced corporate sustainability practice. As an integral part of the United Nations and the UN Global Compact, LEAD is uniquely positioned to inspire widespread uptake of sustainability solutions among businesses around the world.

How have you influenced, or are you attempting to influence their position?
Iberdrola takes an active part in this Group.

(C12.3d) Do you publicly disclose a list of all research organizations that you fund? Yes

(C12.3e) Provide details of the other engagement activities that you undertake.