

# Group Human Rights Policy

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## Policy statement

SSE respects recognised international standards on human and labour rights that are relevant to its business activities. It seeks to conduct its operations with honesty, integrity, respect, and openness.

## Policy purpose

SSE has zero tolerance of human rights abuses and modern slavery in all its forms. It has a responsibility to understand the risks within its own business and supply chain and ensure ongoing management and mitigation of those risks. This policy documents SSE's approach to mitigating modern slavery and human rights risk.

This policy is owned by the Chief Sustainability Officer and is one of a suite of group-level policies that promote a healthy business culture, guide decisions and actions as expected by the company's stakeholders, and make SSE a sustainable company that people want to invest in, buy from, work for and partner with.



**Rachel McEwen**

Chief Sustainability Officer



**Alistair Phillips-Davies**

Chief Executive Officer



## POLICY PRINCIPLES

The following principles highlight how we expect the policy statement to be achieved, and should be used to guide behaviours, decision making and action:

<p>Aligned to International Standards</p>	<ul style="list-style-type: none"> <li>SSE supports and is fully committed to upholding UN Guiding Principles on Business and Human Rights, the 10 Principles underpinning the UN Global Compact, the International Bill of Human Rights and the four fundamental rights of freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation, as set out by the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. SSE also supports and is fully committed to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.</li> </ul>
<p>Zero Tolerance of Modern Slavery</p>	<ul style="list-style-type: none"> <li>SSE has zero tolerance of human rights abuses and modern slavery in all its forms in both its business and supply chain. SSE complies with the Modern Slavery Act 2015 and all relevant human rights, human trafficking and modern slavery legislation in every jurisdiction it operates within. It publishes an annual Human Rights and Modern Slavery Statement outlining the actions it has taken to address modern slavery, available on <a href="http://sse.com">sse.com</a>.</li> </ul>
<p>Assessing Risk</p>	<ul style="list-style-type: none"> <li>SSE assesses its direct and supply chain operations for the risk of modern slavery and human rights abuses and works to mitigate any risks that may emerge. This includes working with strategic suppliers to ensure this risk is considered and appropriate action is being taken. More detail around these assessments can be found in SSE's Human Rights and Modern Slavery Statement.</li> </ul>
<p>A Safe and Secure Workplace</p>	<ul style="list-style-type: none"> <li>Safety is SSE's first priority, and it is committed to providing a safe and secure workplace for all employees and contractors. More detail of how SSE does this can be found in SSE's Safety and Health Policy.</li> <li>A specialist Group Security and Investigations Team is in place to manage the security of all SSE places of work.</li> <li>A UK Human Rights Escalation Procedure is in place to ensure that any reported human rights or modern slavery concerns are escalated to the appropriate team for investigation as a matter of urgency.</li> </ul>

	<ul style="list-style-type: none"> <li>SSE ensures the right to work for all employees is evidenced in line with government requirements.</li> </ul>
A Respectful Work Environment	<ul style="list-style-type: none"> <li>SSE is committed to promoting personal development, fairness, dignity and respect for all employees and those with whom it has business relationships. It actively seeks greater inclusion and diversity in its business and across its supply chain and works to ensure its workplaces are free from discrimination, bullying and harassment. Refer to SSE's Group Employment Policy for more information.</li> <li>The company respects the right of employees to have private lives and will always seek to achieve a fair balance between that right and its legitimate business interests.</li> </ul>
Paying a Fair Wage and Providing Fair Working Hours and a Living Pension	<ul style="list-style-type: none"> <li>Paying those that work for it a fair wage is a cornerstone of SSE's approach to mitigating the risk of human rights abuses. SSE has been an accredited Living Wage employer in the UK since 2013 and has paid the Irish Living Wage since 2016. All supply chain workers that work regularly on SSE sites in the UK must also receive at least the real Living Wage rate.</li> <li>SSE is an accredited Living Hours and Living Pension employer, guaranteeing its workforce in the UK fair and secure working hours and support in saving for a decent level of income in retirement, alongside the real Living Wage.</li> <li>Working hours of employees are monitored in order to control fatigue risks from extended working time.</li> </ul>
Working in Partnership with Trade Unions and other Stakeholders	<ul style="list-style-type: none"> <li>SSE recognises that stakeholder engagement forms a critical part of human rights due diligence in line with the international standards referred to in this policy.</li> <li>SSE proactively engages with relevant stakeholders to advance human rights standards, including suppliers, industry peers in collaborative working groups, third-party human rights experts and non-governmental organisations.</li> <li>SSE has several recognised trade union partners. It respects the right of employees to join independent trade unions, form collective bargaining agreements and have freedom of association.</li> </ul>
Supply Chain Expectations	<ul style="list-style-type: none"> <li>SSE has several channels in place to support the mitigation of the risk of human rights abuses within its supply chain, including clear requirements on modern slavery in supplier registration and pre-qualification questions, risk-based tender questions, contractual clauses, risk assessments, site assessments, strategic relationship management with key suppliers and a commitment to collaboration with suppliers, peers and other organisations within the utilities</li> </ul>

	sector. More detail can be found in SSE's Human Rights and Modern Slavery Statement.
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## ROLES AND RESPONSIBILITIES

This policy applies to all SSE employees, contingent workers and people contracted to provide services to the Company through third parties.

Where we operate internationally, we will utilise our Group Policies as a default, subject to legal or regulatory requirements of the relevant international domain, and relevant local policies and supporting procedures.

**Managers** are responsible for making sure that their teams and colleagues understand and comply with the policy and supporting procedures as well as complete any relevant training.

**All employees** must comply with the policy and supporting procedures and to respect human rights and conduct their business relationships with honesty, integrity and respect.

SSE's **Human Rights Working Group** delivers the actions of SSE's Modern Slavery Action Plan and reports to the Human Rights Steering Group.

SSE's **Human Rights Steering Group** is chaired by the **Chief Sustainability Officer** and is responsible for advising and governing the review and reporting of modern slavery and human rights across the SSE Group.

The **Director of Human Resources** has responsibility for overseeing the application of this policy to those who work for SSE and through management of appropriate Company Consultative Processes.

The **Chief Procurement Officer** has responsibility for overseeing the application of this policy to those who work indirectly for SSE through its supply chain.

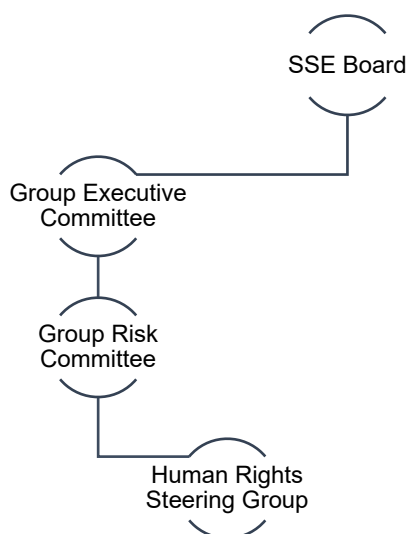


## GOVERNANCE

The **SSE plc Board** and **Group Executive Committee** are responsible for the oversight for this policy including the approval of any changes to the policy. This policy is reviewed annually as part of an evaluation process.

The **Group Executive Committee** supports the Policy Owner 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.

SSE's **Human Rights Steering Group** reports to the **Group Risk Committee** on a quarterly basis, the **Group Executive Committee** twice per year, and the **SSE plc Board** annually. SSE's annual Modern Slavery Statement is reviewed and approved by the Group Risk Committee, the Group Executive Committee and the SSE plc Board.



## TRAINING

SSE has developed an approach for training high-priority employees on human rights and to raise general awareness across the employee population for understanding human rights risk and modern slavery and the potential risks in SSE's direct operations and supply chain.



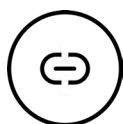
## SPEAKING UP

Any suspected breaches of this policy will be investigated and if proven, will result in action being taken under the SSE Disciplinary Procedure. SSE takes any potential breach of human rights very seriously. Any concerns or instances will be investigated and addressed on a case-by-case basis. Potential mitigations may include action plans, site audit programmes and termination of contract.

Employees can discuss anything that falls short of our expected high standards of ethical conduct and compliance, with their line or any other manager within the business. Alternatively, any concerns can be raised internally at [Speakup@sse.com](mailto:Speakup@sse.com) or externally through SafeCall using:

- Phone:
  - UK - 0800 915 1571
  - Ireland - 1800 812 740
  - All other countries +44 800 915 1571. If you are more comfortable speaking in your own language, an independent telephone interpreter will be made available.
- Email: [sse@safecall.co.uk](mailto:sse@safecall.co.uk)
- [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

*Any wrongdoing brought to light through the Whistleblowing Policy will result in internal disciplinary procedures, possible dismissal and criminal prosecution of individuals involved.*



## SUPPORTING DOCUMENTS

Additional documents available to provide further guidance and support include:

- [Sustainable Procurement Code](#)
- [Sustainable Procurement Code – Supplier Guidance](#)
- [SSE's Human Rights and Modern Slavery Statements](#)
- [Doing the Right Thing](#)

Complementary Policies include:

- PO-GRP-015 [Group Safety and Health Policy](#)
- PO-GRP-006 [Group Employment Policy](#)
- PO-GRP-013 [Group Procurement Policy](#)
- PO-GRP-018 [Group Whistleblowing Policy](#)
- PO-GRP-002 [Group Corruption and Financial Crime Prevention Policy](#)
- PR-HR-057 [UK Human Rights Escalation Procedure](#)



## DEFINITIONS

**International Labour Organisation's Declaration on Fundamental Principles and Rights at Work:** a statement that requires member countries, including the UK and Ireland, to respect, promote and realise the principles set out in eight fundamental Conventions that cover collective bargaining, forced labour, child labour and discrimination.

**Human Rights:** The United Nations defines Human rights as the right for every individual to be treated with dignity, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language 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:** Modern slavery is a violation of human rights, and is defined by the UK government as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the [Modern Slavery Act 2015](#) and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

**UN Guiding Principles on Business and Human Rights:** a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations.

**UN Global Compact (UNGC):** the world's largest corporate sustainability initiative encouraging businesses to implement ten universal principles on environment, human rights, labour and anti-corruption.