

# Group Corruption and Financial Crime Prevention Policy

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## Policy statement

SSE's policy is that it has zero tolerance towards corruption, fraud and criminality (including financial crime), and the giving or receiving of bribes for any purpose.

## Policy purpose

This policy is intended to maintain SSE's established reputation for lawful and ethical behaviour and for financial integrity in all aspects of its business. It aims to minimise the Group's (including its directors' and employees') exposure to bribery, corruption and financial crime and maintain a culture where bribery or corruption is never acceptable.

This policy is owned by the General Counsel 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 responsible company that people want to invest in, buy from, work for and partner with.



**Liz Tanner**  
General Counsel



**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:

Corruption	<ul style="list-style-type: none"> <li>• SSE will implement controls and strategies to manage the risks and to comply with legal and regulatory obligations and reporting requirements relating to corruption.</li> <li>• Corruption can include, but is not limited to, acts of financial crime, internal or external fraud, theft, bribery, mis-reporting, deception, or misappropriation.</li> </ul>
Financial Crime	<ul style="list-style-type: none"> <li>• SSE aims to maintain a strong and positive culture towards ethics and compliance and doing the right thing. Financial crime is never acceptable and may include, but is not limited to, the following:             <ul style="list-style-type: none"> <li>○ Financial Sanctions</li> <li>○ Money Laundering</li> <li>○ Bribery</li> <li>○ Terrorism Financing</li> <li>○ Human Trafficking and Modern Slavery</li> <li>○ Facilitating Tax Evasion</li> <li>○ Market Abuse</li> </ul> </li> <li>• As hospitality/gifts can be perceived as a form of bribery, when deciding whether to accept or offer hospitality/gifts guiding principles should be followed as outlined in PR-COR-078 Corporate Hospitality Procedure.</li> <li>• SSE promotes the disclosure and management of potential conflicts of interest.</li> <li>• SSE only accept and raise invoices and other contractual documents which are true to our agreed commercial situation and which do not include false information.</li> </ul>
Anti-competitive practices	<ul style="list-style-type: none"> <li>• In conducting its business, SSE has zero tolerance in relation to any competition law infringement. It is committed to competing vigorously and fairly, and to giving full consideration at all times to its obligations under UK, EU and Irish competition law (together with competition laws in any other jurisdiction in which SSE is active).</li> </ul>
REMIT	<ul style="list-style-type: none"> <li>• SSE will comply with EU Regulation No.1227/2011 on wholesale energy market integrity and transparency (REMIT) (“the Regulations”).</li> </ul>

