

SSE is committed to maintaining its established reputation for lawful and ethical behaviour and for financial integrity in all aspects of its business. SSE has zero tolerance of corruption, fraud and criminality (including financial crime), and the giving or receiving of bribes for any purpose. SSE aims to minimise the Group's (including its directors' and employees') exposure to bribery and corruption by:

- maintaining a culture where bribery or corruption is never acceptable;
- encouraging employees to report any suspicion of corruption, bribery or misconduct;
- widely communicating the company's Anti-Bribery & Corruption policy, providing bribery and other appropriate training to all relevant employees;
- understanding and following anti-financial crime legislation;
- maintaining a clear Hospitality Procedure relating to the acceptance and offering of gifts & benefits;
- supporting any person who reports bribery or corruption in good faith, and protecting them from victimisation;
- making our political engagement policy and procedures available to all interested parties.

Definitions

Corruption involves dishonest or illegal behaviour, deception and / or concealment (whether for personal gain or perceived operational benefit). Corruption can typically include activities such as theft, mis-reporting, conspiracy, embezzlement or financial crimes such as money laundering, tax evasion or terrorist financing.

Bribery is where a financial (or other) advantage is given or received to improperly induce performance of functions or activities, or to reward a person for already having done so. Examples of bribery include:

- the giving or receiving of cash, gifts, credits, discounts, hospitality, travel, accommodation, services or the awarding of contracts to procure a personal or business advantage;
- inducing those with a public function to perform it improperly (e.g. to make a favourable decision);
- enticement to speed-up routine actions or processes.

Group Policies and Procedures

- Corporate Hospitality Procedure (PR-COR-060)
- Whistleblowing Policy - "Speak Up" (PO-COR-034)
- "Doing the Right Thing" – A Guide to Ethical
- Business Conduct for all Employees
- Conflict of Interest Procedure (PR-COR-GS-016)
- Group Compliance Policy (PO-COR-053)

Penalties

Any form of corruption will be treated as gross misconduct and disciplinary procedures will be rigorously applied. This may result in dismissal and, in extreme cases, criminal prosecution.

Individuals, employees, managers, directors and companies can all be held accountable for bribing other individuals or organisations under the Bribery Act 2010. Penalties for bribery offences include imprisonment for up to 10 years and unlimited fines. Directors may also be disqualified from acting as a director, and companies banned from entering into public sector contracts.

Reporting

SSE encourages employees to report any instances of suspected bribery or corruption confidentially to its nominated contacts or via SafeCall, our independent external reporting line:

UK: 0800 915 1571 Rol: 1800 812 740

email: sse@safecall.co.uk

For financial crime matters, email: cafco@sse.com



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