

# DOING THE RIGHT THING

SSE's guide to good business ethics



# DOING THE RIGHT THING DOING BUSINESS ETHICALLY

“Business ethics is the application of ethical values to business behaviour. Business ethics is relevant both to the conduct of individuals and to the conduct of the organisation as a whole. It applies to any and all aspects of business conduct, from boardroom strategies and how companies treat their employees and suppliers to sales techniques and accounting practices.

“All organisations need to demonstrate why they are trustworthy in order to operate effectively and sustainably. Reputations are not solely based on the delivery of products and services, but on how an organisation values its stakeholders. Having a reputation for acting with honesty and integrity not only differentiates an organisation, it makes it more successful.”

## Institute of Business Ethics

ibe.org.uk @IBEUK

### What is this guide for?

This is a general guide which sets out the standards, commitments and policies SSE has in place to ensure that we are Doing the Right Thing as we go about our work.

It is not intended to be a comprehensive compendium of laws, regulations, policies and rules.

### Who is this guide for?

The information within this guide is for all SSE employees, as well as people employed by other organisations to work on SSE's behalf.

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## || FOREWORD

At SSE, our purpose is to provide energy needed today while building a better world of energy for tomorrow. Our vision is to be a leading energy company in a net zero world.

We take pride in our purpose and vision and we care about each other, our customers, shareholders and the impact we have on wider society. We will only continue to fulfil our purpose and achieve our vision if we do business in the right way, or ethically.

With our Flexible First approach to working, our agile approach to change and the speed at which cyber security, climate legislation and corporate governance requirements are changing it is more important now, than ever before, that we are all considering our decisions and making them in the right way. This guide is for every one of us working on behalf of SSE and is designed to help us understand how rules, regulations and standards - along with the SSESET values - underpin how we should each do our jobs and make sure we do business ethically.

SSE promotes a healthy business culture. We have:

- a purpose, values and vision that are embedded in our decision making;
- an operating environment that is inclusive, diverse and engaging;

- a culture that encourages us all, as people working on behalf of SSE, to make a positive difference for our stakeholders;
- a way of working in which values guide decisions and actions;
- a way of working in which attitudes and behaviours are consistent with high standards of conduct and doing the right thing;
- a leadership blueprint with Doing the Right Thing at its heart; and
- a way of raising concerns if something is not being done correctly.

This guide summarises how we can all support a healthy business culture– and in doing so support our company’s success for the long term.



**Alistair Phillips-Davies**  
SSE's Chief Executive



## || INTRODUCTION

We all want to work for a fair and ethical company and SSE is committed to doing business in the right way, ethically. While we know we must follow the legislative and regulatory rules set for us, at SSE, we consistently seek to go beyond these and set standards for the company that promote better outcomes for employees, shareholders and society as a whole. Examples include our commitments to the Fair Tax Mark, paying the Real Living Wage and meeting science-based carbon targets.



However, the fact is, companies succeed or fail by human behaviour on sites, behind desks, working from home, in informal discussions and in meetings – behaviour that is reflected in the millions of actions, conversations, emails, text and other messages that go back and forth in large companies like SSE.

This guide provides information on the way we do business, why this is important for SSE and what we expect from you. Working together, to the standards we have set, will ensure an open and positive culture and the best outcomes for us all.

Every one of our jobs involves judgement, and in the busy, constantly changing environment in which we all now work, this guide will help us get those judgements right. It doesn't contain the answer to everything; but it paints a picture of how we should all go about our jobs.

It also explains what to do if we spot or sense something that isn't right. Seeking advice, raising concerns or reporting evidence pointing to wrong-doing are the actions of responsible people committed to doing the right thing by their

colleagues, the company and the people who depend on us at SSE to do our job properly.

This guide confirms the mandate we have to challenge behaviours or actions that may be unethical – and sets out how Safecall gives us an independent first point of contact if we feel we cannot raise concerns about wrongdoing in our teams or with our manager.

I hope this guide helps you in the important work you do for SSE and for the wider energy system on which people, organisations and businesses where we operate depend. If you need any support understanding what is being asked of you or further details on anything below, please reach out to the contacts provided in each section.



A handwritten signature in black ink that reads 'Liz Tanner'.

**Liz Tanner**  
SSE's General Counsel



# || UNDERSTANDING ETHICS RULES AND VALUES COMBINED

Working ethically means every one of us who works for SSE not only has to follow the rules – the laws applicable to where we work and the obligations put in place by Regulators; but also that we operate to the higher standards we set for ourselves as a sustainable company committed to achieving long term success that creates value for shareholders and society. We aim to balance our business needs with those of our stakeholders, where it is right to do so.

## Knowing the Rules

The rules can be society-wide, such as laws on business practices which prevent, restrict or distort competition; they can be energy sector-specific, such as legal and regulatory separation of businesses within the same company; and they can be company-specific, such as SSE's commitments to higher standards reflected in the Company's policies on things ranging from safety and health to protecting people's data and tackling climate change.

## Combining Rules and Values

Our higher standards are underpinned by the SSE SET of values – Safety, Service, Efficiency, Sustainability, Excellence and Teamwork. These values should guide the attitudes and behaviours of every one of us working on behalf of SSE every day. It is this combination of values, policies and rules that together represent SSE's framework for doing business ethically and for maintaining a healthy business culture.

## Navigating the Rules

The breadth and depth of the laws, regulations and standards applying to a large company such as

SSE, and to all of us who work on its behalf, can be daunting; and the rules are often subject to review and change. That's why SSE's i-Comply portal exists on ssenet. By bringing together in one place key rules applying to SSE and its individual business units i-Comply is designed to provide practical help.

## SSE's own policies

SSE also has a set of Group Policies and Employee Rules designed to help in decision-making, which complement the Rules which apply to us and guide every one of us in SSE towards doing business ethically and achieving sustainable business outcomes. These can be found in the Document Library on SSENET

## Asking for Help

We are a team, and value teamwork at SSE. If you need help understanding the Rules or Group Policies, we have subject-matter experts who can provide practical guidance and advice.

These include Human Resources; Safety, Health and the Environment; and General Counsel (Legal

Services, Markets Regulation and Group Compliance and Data Protection). Contact details are provided in each of the sections below and at the end of this Guide.

## Leaders at SSE

At the heart of our Leadership Blueprint is Doing the Right Thing. As a leader at SSE we expect you to:

- create a culture that is inclusive, respectful and that operates ethically in line with our Guide and our Leadership Blueprint;
- encourage Speaking Up and respond to any concerns raised;
- ensure that where someone chooses to Speak Up, that no retaliation occurs;
- promote the Doing the Right Thing Guide and assist our employees in understanding what is expected of them;
- hold yourself and those that work for you accountable for Doing the Right Thing.



# BEING GUIDED BY VALUES

## THE SSE SET

### SSE'S VALUES

#### 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

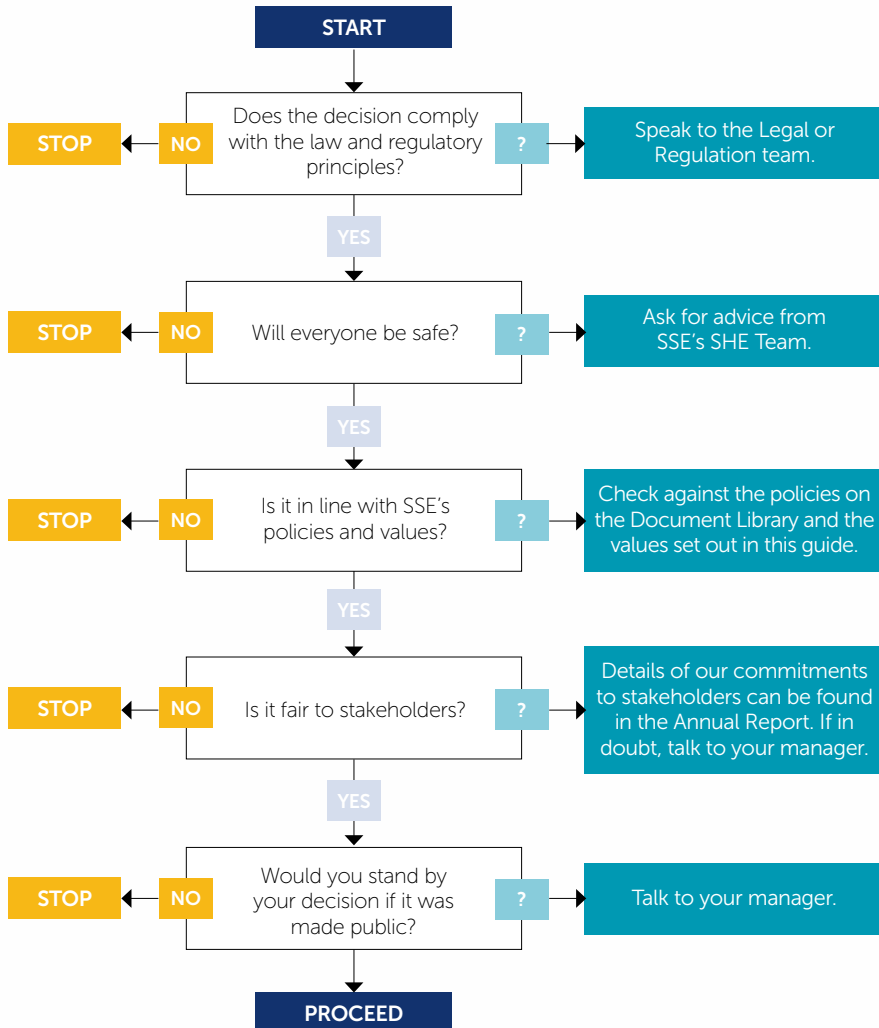
We work together, respect each other and make a difference.



# IF IT'S NOT RIGHT, WE DON'T DO IT

## PRACTICAL STEPS

Using a "decision tree" and applying simple a "yes check" is an effective way to guide you towards doing the right thing and making decisions in a ethical way.



# SPEAKING UP LISTEN, ACT, PROTECT

An essential feature of our ethical approach is ensuring everyone can raise concerns about wrongdoing, malpractice or any form of criminal activity in the workplace – and has the confidence to do so without fear of repercussion.

Our approach to Speaking Up (or whistleblowing) can be summarised as LISTEN, ACT and PROTECT:

- **LISTEN** – creating a culture for employees to speak up
- **ACT** – responding when wrongdoing is reported
- **PROTECT** – supporting employees who do the right thing

Our values, policies and the rules - should be enough to ensure everyone in SSE does the right thing, but bad things can happen in good companies.

Unethical workplace behaviour can vary from minor transgressions to illegal activity – but is any action that harms the legitimate interests of our organisation, our workforce, customers and wider society.

This could include, but is not limited to, putting people in harm's way and at risk of injury; criminal offences; other breaches of laws or regulations; actual or possible harm to the environment; abuse of company property; abuse of position by managers; or harassment or bullying by colleagues.

That's why our company Board gives every employee a mandate and empowers them to challenge attitudes, behaviours or actions that may fall short of what's expected.

While you should be able to raise your concerns with your manager if you don't feel comfortable or feel your concern is not being taken seriously, our Whistleblowing Procedure sets out what you can do. This includes contacting Safecall, an independent, external and confidential first point of contact.

Safecall is a provision of a wider SSE policy on Speaking Up (Whistleblowing) that allows our people to confidentially or otherwise report unethical conduct by people working for SSE.

As someone working on behalf of SSE it's your right to speak up in good faith when you think you have grounds for doing so. You could be preventing significant harm to people, the environment, the company or wider society. You are also supporting an ethical business culture for our colleagues and stakeholders who depend on us at SSE to do a good job.

## RESOURCES AVAILABLE

- Group Whistleblowing Policy
- Whistleblowing Procedure - Speak Up
- Employee Rules





## SPEAKING UP YOUR PROTECTION

If you take the brave step of speaking up with a concern in good faith, you will not face any repercussion or negative outcome as a result. SSE is committed to an open and challenging culture.

Your report will be investigated by professional and experienced individuals in SSE who know how important it is to deal with things in a confidential and discreet way.

Anyone – however senior in the Company – who tries to intimidate or victimise someone who speaks up will be committing a criminal offence as well as a very serious breach of SSE's rules and will be dealt with accordingly. More information on protecting employees that speak up is detailed within SSE's Whistleblowing Policy.

It does help if you provide your name and contact details when raising a report, so any requests for clarification or additional information can be made and so you can be kept up to date with how the investigation is going. Your details will be held confidentially on the Whistleblowing Register owned by Group Security. Your details will never be shared within SSE without your consent.

However, reports from people who prefer to remain anonymous will always be investigated as long as the information provided is enough

to base an investigation on.

If you raise a concern, the first step is to make sure you receive prompt acknowledgement and are thanked for raising the issue.

After initial investigations are completed, a decision will be made on whether a full investigation is needed, co-ordinated by the Group Security and Investigations team. Where possible, you will be kept informed although it may not always be possible to disclose full details of the investigation. As part of our aftercare programme we will also follow up with you from time to time to ensure you have experienced no retaliation as a result of Speaking Up.

There are many potential outcomes of an investigation, such as changes in working practices and policies, disciplinary action, dismissal, or possibly no action. Where possible, you will receive an explanation of the outcome, although in certain circumstances outcomes must remain confidential and any actions taken may not always be evident.



## PART 1: STAYING SAFE AND SECURE IF IT'S NOT SAFE, WE DON'T DO IT

Safe means being protected from or not exposed to danger; and it also means being not likely to be harmed or lost. And at SSE, if it's not safe, we don't do it. That's why we do everything we can to make sure no harm is done to people's health and wellbeing or to the environment as a result of the work we do. It's also why we do everything we can to safeguard people's privacy, devices, programmes, systems and networks.



### Part 1 covers:

- Putting safety and health first
- Safeguarding the environment
- Being cyber secure
- Managing data and information



# PUTTING SAFETY AND HEALTH FIRST IF IT'S NOT SAFE, WE DON'T DO IT

## What is safety and health?

Safety at work isn't only about single, injurious incidents; or failure to maintain the integrity of operational plant and equipment. It's about the impact of work on occupational health and wellbeing. This ranges from the physical impact of repetitive activities not being carried out appropriately, to work giving rise to mental health issues – or mental health issues affecting our ability to do our job.

## Why is it important for business ethics?

At SSE, if it's not safe, we don't do it.

The people we work with are not simply our colleagues. They are also partners, parents, children, sisters, brothers and friends. If someone is hurt working for SSE, or by someone working for SSE, the consequences extend to that person's colleagues, family and friends. It's fundamentally important that **we all get home safe** from our work.

## What are the right behaviours?

If it's not safe, we don't do it is not a slogan: it's a mandate to every person working on behalf of SSE to insist on safe working for themselves and for the people around them.

And to ensure we all get home safe we:

- Take care of ourselves and each other;
- Take pride in our work and workplace;
- Keep our workplace free from impairment caused by drugs or alcohol;
- Plan, scan and adapt;
- See it, sort it, report it.

All employees of SSE are entitled to expect, and are expected to support, a working environment in which physical and mental health issues are recognised and understood and where practical steps are taken to ensure those issues are resolved in a professional and sympathetic way. This means supporting procedures, completing all relevant training and reporting safety hazards or unsafe working practices.

## DILEMMA

**On site, there was a near-miss when an employee tripped over an unmarked step and fell without injury. Do I really have to report a safety incident even if nobody was hurt?**

This is a near-miss incident and reporting these incidents is a very important way of identifying problem areas and can highlight some of the less obvious hazards in a workplace or identify areas where a problem is developing. For every accident, it's estimated there are approximately 90 near-misses. With a good reporting system in place, the hazard could be dealt with before someone is injured.

## RESOURCES AVAILABLE

- Group Safety and Health Policy
- SSE's internal safety website, safetynet



# SAFEGUARDING THE ENVIRONMENT PROTECT, RESTORE AND ENHANCE

## What is safeguarding the environment?

The breadth and depth of SSE's activities means many people's jobs interact with the natural environment. At SSE, we aim to protect local environments by identifying any risk of harm, managing and mitigating those risks at the same time as proactively engaging with stakeholders to make positive environmental improvements where we can. We want to protect, restore, and enhance the environment.

## Why is this important for business ethics?

Good quality natural environments are not just essential for SSE to operate successfully, but also for society. SSE's activities can have impacts on environmental resources and services that provide value directly and indirectly to others, so these impacts must be actively managed. SSE's activities are subject to several environmental regulations and it works constructively with a range of environmental regulators to ensure that it meets the high standards of environmental performance and disclosure required.

## What are the right behaviours?

In order to protect the environment and operate in a sustainable way, we design, construct, operate and decommission our assets and conduct our operational activity in full compliance with all relevant legal and regulatory obligations – and go further if we can.

We aim to decrease the impact of our resource consumption by minimising resource use and waste production; engaging with the circular economy by using reprocessed materials and ensuring our waste can readily be reused or recycled as far as is practical and using materials that have sustainable lifecycle impacts.

We also seek to go above and beyond this and meet additional relevant voluntary standards in order to bring about positive environmental outcomes, such as working towards 'biodiversity net gain' for new major projects after 2025.

## DILEMMA

**I have been asked to start a task before all the environmental protection controls set out in the project method statement have been put in place. What should I do?**

Environmental controls, such as surveys for protected species, silt settlement ponds, drip trays, spill kits, and waste storage containers are there to protect the environment and are a necessary part of many jobs. If these controls have not been provided then use your Safety Licence to stop, speak to your supervisor, and do not start until the required environmental controls are in place.

## RESOURCES AVAILABLE

- Group Environment Policy
- Group Environment Strategy



# BEING CYBER SECURE

## BE AWARE, TAKE CARE, STAY SECURE

### What is cyber security?

We live in challenging times. The threat of cyber-crime has never been greater, and the risks we face – at home and at work – are significant. Threats to cyber security can take many forms, including phishing scams, hacking and taking control of physical assets. Cyber security is how we reduce those risks and protect the devices we all use (smartphones, laptops, tablets and computers) and the services we access both online and at work.

### Why is this important for business ethics?

The growing risk of cyber security means we have to be vigilant. At SSE, we are responsible for nationally important infrastructure and holding significant amounts of data, and that responsibility means making sure our systems, assets and people are safe and secure, and that customers are not put at risk. To ensure we do this we have our Be Aware, Take Care, Stay Secure approach:

- Being aware means being vigilant at all times, in different places and situations;
- Taking care means knowing what we must do with SSE information to keep it secure; and
- Staying secure means the actions we take which will keep us and SSE cyber secure.

### What are the right behaviours?

All SSE colleagues have an individual responsibility to work in a way that protects us all from cyber threats. It is our duty to understand the risks, learn how to recognise something unusual and take all the steps we can to keep ourselves and our information and systems secure.

For example, we might be tempted to ignore a suspicious looking email, but if the same email was sent to another of our colleagues, they may not spot the clues and open it. This is why it is important to always report and not ignore anything suspicious.

There are simple steps we must all take with our passwords, IT equipment and documents. See IT's Be Aware, Take Care, Stay Secure document on ssenet...and keep your cyber security e-learning up to date.

## DILEMMA

**I need to do some work on SSE data that I have, and I've found a website which offers free software that can easily do it. Is it OK to use it?**

'Free' software and services are often not licenced to be used by businesses, so this may be illegal. Free software is often used to disguise computer viruses which, if downloaded could then affect the whole of SSE. Even if this is not the case, we wouldn't have any contract in place, or any idea what the website or software will do with the data or whether it will be stored securely or shared with others. For these reasons you should only use software that is approved by IT. It is better to talk to IT to see if SSE already has software that can help, or to arrange purchase of a corporate licenced version of the software.

## RESOURCES AVAILABLE

- Group Cyber Security Policy
- Cyber security e-learning module



# MANAGING DATA AND INFORMATION

## LOOK AFTER PEOPLE'S PRIVACY

### What is GDPR?

GDPR has become one of the best-known acronyms at work and beyond. It stands for General Data Protection Regulation and in summary, it requires us to keep people's data accurate, safe, secure, accessible to authorised people only and lawful so that our details, those of our colleagues and other business stakeholders are properly protected. We observe the confidentiality of business units and adhere to business separation through restriction of access to information.

### Why is this important for business ethics?

It is important that SSE is a company that people can trust with their data. Looking after people's privacy is part of a wider, responsible approach to managing information so that we govern the creation, use, storage and destruction of digital and physical information in all its forms (documents, records, content).

### What are the right behaviours?

When collecting or using personal data we must ensure it is processed in a lawful, fair and transparent way; collected for specified, explicit and legitimate purposes; and be adequate, relevant and limited to what is necessary.

In addition, personal data must be accurate and where necessary kept up to date; kept for no longer than necessary; and processed in secure ways that guard against accidental loss, destruction or damage.

### DILEMMA

**I would like to set up a database of customer information for a new service and am wondering what I need to do?**

A Data Protection Impact Assessment (DPIA) may be required to find out if there are extra steps needed to meet the GDPR requirements and assess the risks associated with the database. It is important that you always speak to your Data Protection Specialist before using customer data in this way, they can advise on privacy by design and any need for a DPIA.

### RESOURCES AVAILABLE

- Group Data and Information Management Policy
- GDPR e-learning module



## PART 2: TRADING FAIRLY AND TRANSPARENTLY COMPETING IN THE RIGHT WAY

At SSE we are committed to trading fairly, to ensuring that we all know what constitutes a fair trade and what does not, and to speak up when we suspect misconduct. Trading unfairly is not only unethical; it is illegal.

### Part 2 covers:

- Business separation
- Competition
- Integrity and transparency in the wholesale energy market
- Disclosure and share dealing
- Corruption and financial crime
- Responsible procurement
- Conflicts of interest



# BUSINESS SEPARATION

## DIFFERENT BUSINESSES; SAME HIGH STANDARDS

### What is business separation?

SSE is a UK-listed company that comprises a number of subsidiary business units and companies. Some of these subsidiaries are required to be legally separate from other subsidiaries. This requirement is called 'business separation'.

### Why is this important for business ethics?

At SSE, we must not restrict or distort competition in the energy market. SSEN Distribution, SSEN Transmission and SSE's Independent Distribution Network Operator are therefore required, as part of their licences, to operate and maintain legal and regulatory separation from other companies in the SSE group. This includes not sharing any commercially sensitive information with other SSE business units, especially those involved in generation and supply activities and any affiliate Independent Distribution Network Operator (see below).

Rules around business separation also apply to SSE's Gas Storage business, which must also be kept distinctly separate from other parts of the SSE group; and the Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) also has important implications for the how information within SSE's Business Units is managed.

### What are the right behaviours?

We must ensure that:

- Information about SSEN Transmission, SSEN Distribution, SSE's Independent Distribution Network Operator and SSE Gas Storage is kept confidential within those businesses or the corporate services required to support them;
- No unfair advantage is provided by these businesses to other parts of SSE;
- Cross-subsidy between the businesses and other parts of SSE is prevented; and
- We use the right branding.

Similarly, all of the above apply to SSE's Independent Distribution Network Operator (IDNO) (Optimal Power Networks Ltd.) and SSE's Gas Storage business.

### DILEMMA

**I work in networks and I have been working on a quote for connecting a proposed wind farm being developed by SSE Renewables. We are nearly ready to provide a quote and I saw that a competitor has made inquiries about connecting in close proximity to the proposed SSE Renewables site. Can I share this information with members of SSE Renewables?**

No. This is a perfect illustration of confidential information that networks holds because it is a monopoly business. It would be very wrong for SSE Renewables to gain information on one of their competitors from SSEN. There must be no advantage to SSE Renewables from SSEN.

### RESOURCES AVAILABLE

- Risk Management and Internal Control Policy
- Group Procedures on Application of Business Separation Rules
- Networks Business Separation e-learning module
- Business separation e-learning module





# FAIR COMPETITION ELIMINATING ANTI-COMPETITIVE BEHAVIOUR

## What is fair competition?

Successful economies depend on fair competition, and successful companies do too. In SSE, our businesses depend on well-functioning competition, where companies operate on a level playing field to ensure we are not unfairly disadvantaged.

## Why is this important for business ethics?

It is in our interests that competition law prohibits any agreement or concerted action that is designed to or results in competition being prevented, restricted or distorted. Penalties for breaches of competition law apply to individuals as well as companies.

## What are the right behaviours?

We all have a responsibility to do our jobs in a way that guards against any risk of breaching competition law. Training in competition law is provided to any employee of SSE who needs it.

## DILEMMA

**I have never had competition law training and have been asked to attend a meeting at Energy UK where there will be a number of SSE's competitors in attendance. Can I go?**

No. You must have a detailed understanding of your obligations under competition laws before you have meetings with SSE's competitors. You need to understand what you cannot discuss and you also need to know what to do if one of the other participants start discussing something that is against competition rules. You should ask your line manager to make sure you receive the competition law training before you attend a meeting like this.

## RESOURCES AVAILABLE

- Group Corruption and Financial Crime Prevention Policy
- Competition law e-learning module
- Competition MyLearning Site



# INTEGRITY AND TRANSPARENCY IN THE WHOLESALE ENERGY MARKET

## MAINTAIN INTEGRITY

### What is REMIT?

The Regulation on Wholesale Energy Market Transparency (REMIT) applies to wholesale energy markets. It defines and prohibits market abuse (market manipulation, attempted market manipulation or insider trading) and requires effective and timely disclosure of inside information by market participants.

### Why is this important for business ethics?

REMIT is intended to ensure that energy customers and other stakeholders can have confidence that wholesale energy markets operate in an open and competitive way. Penalties for breaches of REMIT apply to individuals as well as companies. In September 2020, SSE was penalised for an historical breach of wholesale energy market regulations relating to the timing of disclosure of capacity availability at Fiddler's Ferry power station in 2016. SSE did not benefit from the timing of the disclosure but Ofgem ruled that the Company did not act in an "effective and timely" way and it imposed a substantial fine.

### Who does REMIT apply to?

REMIT applies to anybody who participates in wholesale energy markets but it also extends to anybody who has information or is carrying out activities which may have an impact on those markets. Training is mandatory for anyone at SSE whose role falls within these categories. If you are unsure about your REMIT responsibilities or training requirements, you should speak to your line manager.

### What are the right behaviours?

For SSE's businesses participating in wholesale energy markets this means, amongst other things, ensuring effective identification, handling control and timely public disclosure of information by market participants to ensure market integrity.

## DILEMMA

**My colleague and I have been working on a confidential project about the operation of a power station. We're pretty sure we don't need to change any of the information about the power station on the REMIT portal. Are we OK to leave it at that?**

No. Under our REMIT obligations we are required to provide timely and accurate updates on any of our activities that could have an impact on wholesale energy markets and it's not good enough to be 'pretty sure'. If there is any doubt, advice should be sought swiftly from colleagues in Legal Services and Regulation, a note of the decision made, and any update agreed made as soon as possible.

## RESOURCES AVAILABLE

- REMIT Group Guidance REF-REG-004
- SSE Internal REMIT portal on SSENET
- REMIT e-learning training module



# SHARE DEALING OBLIGATIONS

## TREAT ALL INVESTORS EQUALLY

### What is disclosure and share dealing?

SSE is listed on the London Stock Exchange, which means that people can trade in its shares. A related requirement of this position is for SSE to make certain types of information public, within specific timeframes, and in a particular way so that all shareholders can assess their investment on equal terms.

The highest class of confidential information that a company can hold is called inside information. SSE must have in place processes to prevent inappropriate use of inside information when it knows individuals have access to it. Inappropriate use can constitute an illegal act and include telling other people of the inside information and dealing based upon it. Examples of inside information could include: annual or half-year results; major deals to buy or sell a business; changes to the Board; and major contracts awarded.

Some of us will receive different classes of confidential information about SSE through the work that we do and in some instances on a regular basis. When this is the case, an individual may be told that they are an Insider or Restricted Person in relation to SSE and that they are required to understand the rules within SSE's Share Dealing Procedure.

These include asking permission to deal in SSE shares and a strict prohibition against dealing at certain times during the year.

### Why is this important for business ethics?

The value people attribute to SSE's shares will be influenced by the information they have about the company. For this reason, in SSE we are strongly committed to complying with our obligations as a listed company under the UK Market Abuse Regulation (UK MAR) and the Financial Conduct Authority's 'Rules'.

### What are the right behaviours?

At SSE, we need to ensure the timely, fair and proper disclosure of information using the correct channels in line with the applicable legal obligations as a listed company. This supports the fundamental principle that all investors should be treated equally.

Occasionally, some of us may receive inside information about SSE that is not available to the general public and could influence an investor to buy, sell or hold shares, and if disclosed, may lead to a significant up or down movement in the price of SSE's shares. As employees we must not be involved in any dealing in SSE shares because we have access to this information; we must not disclose it; nor encourage anyone else to deal in shares based on such information. These actions could result in an individual breaking the law and committing a criminal act with severe consequences.

## DILEMMA

**I'm working on a really important project where SSE might invest a lot of money. It's very exciting, can I discuss it with colleagues and friends?**

All employees owe a duty of confidentiality to the company, which means that any internal information they hold due to their role should not be disclosed for an improper purpose. When you are aware of information which could impact on SSE's share price, for example, an important project, it is likely that you will be on an 'insider list', 'restricted list' or 'confidentiality list'. This means you must not discuss the project with anyone who is not on that list alongside you, and you may be required to seek permission before dealing in SSE shares. Dealing could be prohibited depending on the status of the project.

## RESOURCES AVAILABLE

- [Group Disclosure and Share Dealing Policy](#)



# PREVENTING CORRUPTION AND FINANCIAL CRIME

## CRIME WON'T PAY

### What is corruption and financial crime?

Corruption involves dishonest or illegal behaviour, deception and/or concealment (whether for personal gain or perceived company benefit) and can include, but is not limited to, acts of financial crime, internal or external fraud, theft, bribery, mis-reporting, deception or misappropriation. Bribery is where a financial or other advantage is given or received to improperly induce people to do things or 'reward' them for already having done so.

### Why is this important for business ethics?

Individuals and companies can be held legally accountable for bribing other individuals or organisations. We should ensure our decisions and actions are lawful and ethical, based on the right thing to do for the company and our colleagues, rather than for personal gain.

### What are the right behaviours?

It's in all our interests that SSE has an established reputation for ethical and lawful behaviour and for financial integrity in all aspects of our business. We all have to maintain a culture whereby bribery, corruption or financial crime is unacceptable.

As hospitality and/or gifts received could be perceived as a form of bribery, the SSE Hospitality Procedure should be followed when deciding whether to accept or offer hospitality or gifts.

## DILEMMA

**I have noticed something unusual in the way a business energy customer is running their account. The customer is building up a large credit balance and asking for it to be reimbursed to another bank account. This customer has been with SSE for a long time and is a valued customer. Is it alright to go ahead and reimburse the credit balance to the bank account that the customer has requested?**

In the first instance you should raise your concerns through the correct channels. The pattern of payments that you describe is typical of that used by money launderers. It is important to remember not to discuss your concerns with the customer, nor with any colleagues who do not need to know about this, as this could constitute "tipping off" which is, in itself, an offence.

## RESOURCES AVAILABLE

- Group Corruption and Financial Crime Prevention Policy
- Anti-Financial Crime Portal on SSENET
- SSE Hospitality Procedure & Portal on SSENET
- E-learning modules:
  - Fraud awareness
  - Bribery and Anti-Corruption
  - Anti-Money Laundering and Financial Sanctions



## RESPONSIBLE PROCUREMENT BUY IN THE RIGHT WAY

### What is responsible procurement?

At SSE, our responsibilities do not stop with our direct operations. We have a large and complex supply chain and by setting standards of conduct with our suppliers and contractors when we buy goods, works and services, positive outcomes that support SSE's position as a sustainable company can be achieved.

### Why is this important for business ethics?

We expect business to be conducted ethically, sustainably and in a compliant manner. That includes complying with the obligations that arise from the EU Procurement Directives: transparency; non-discrimination; equal treatment; mutual recognition; and proportionality.

### What are the right behaviours?

SSE's suppliers and contractors are expected to meet the principles outlined in the Sustainable Procurement Code and associated Supplier Guidance. This means going beyond just complying with local laws and regulations and respecting internationally recognised human and labour rights: SSE also expects values and standards around sustainability and fairness to be upheld by those working in its supply chain.

### DILEMMA

**I work in a small depot and the cleaning services provided through the company are very poor. I know we can hire a small local company to do the cleaning for much less cost and better quality and we can pay for it through the depot. Can I hire them?**

There are very good reasons why SSE procures goods and services centrally. It means we can insist on high standards on things like health and safety and we can be sure that the business employed is legitimate. In this case, the fact that there are problems with the current cleaning services should be raised with the contract manager – we should give the existing company a chance to improve. If through a managed improvement plan, they fail to improve, then a new process can be established to appoint a new supplier fairly. We want to encourage local suppliers, and the local company you mention could be encouraged to participate in the process.

### RESOURCES AVAILABLE

- Sustainable Procurement Code
- Sustainable Procurement Code: Supplier Guidance
- Procurement: Code of Practice
- Procurement and Commercial Engagement Portal



# CONFLICTS OF INTEREST

## LOOKING AFTER OUR PERSONAL REPUTATION

### What are conflicts of interest?

A conflict of interest is a situation at work in which someone is in a position to derive personal benefit for themselves or someone or something associated with them (such as a family member or friend or other organisation) from actions they take or decisions they make at work. Examples can include recruiting or contracting a close friend or family member, having a second job or holding a financial interest in a supplier or contractor.

### Why is this important for business ethics?

When a conflict of interest arises, it can cast doubt on our integrity and ability to make objective and unbiased decisions. Sometimes a perceived conflict of interest can be equally damaging.

### What are the right behaviours?

We must avoid situations where our personal interest could be in conflict with those of SSE. We all have a responsibility to inform our manager of a potential or actual conflict as soon as we become aware of it.

### DILEMMA

**I work in renewables and my husband part owns a small company that is bidding for forestry work on a new wind farm site with SSE. Does that form a conflict of interest?**

It might do. It depends if you have access to knowledge that could place your husband's firm at an advantage, or, even more seriously, could allow you to influence the process. In this case, you should tell your line manager immediately – it is better to be safe than sorry. If it is a conflict, it is likely you will be prevented from getting involved in any decisions that relate to this or other projects that may be linked to your husband's business, both now and in the future.

### RESOURCES AVAILABLE

- Group Corruption and Financial Crime Prevention Policy

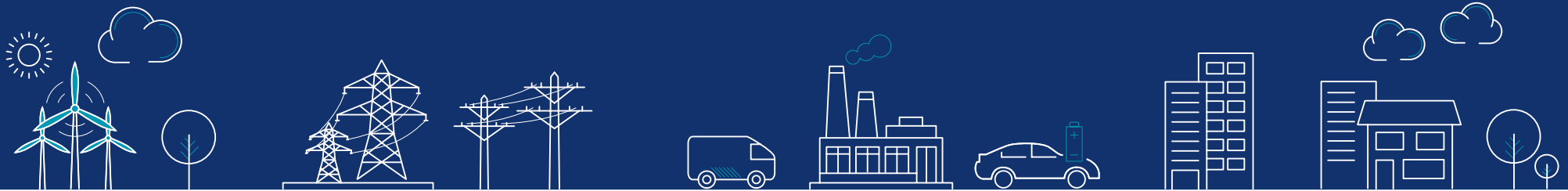


## PART 3: WORKING TOGETHER VALUING THE PEOPLE WE WORK WITH

At SSE, we work together, respect each other and make a difference.

### Part 3 covers:

- Human rights and modern slavery
- Inclusion and diversity
- Bullying, harassment and discrimination
- The Living Wage and Living Hours



# HUMAN RIGHTS AND MODERN SLAVERY A ZERO TOLERANCE APPROACH

## What are human rights and modern slavery?

Human rights are rights inherent to all human beings, whatever our nationality, place of residence, gender, national or ethnic origin, sexual orientation, colour or religion. Human rights abuses and examples of modern slavery includes forced labour, servitude, slavery, human trafficking, debt bondage, forced or servile marriage, descent-based slavery and child labour.

## Why is this important for business ethics?

An organisation built on a foundation of abusing the fundamental rights of the people who work for it will not be successful. Protecting people from these risks and those who seek to exploit them must be a cornerstone of any sustainable business.

## What are the right behaviours?

There are absolutely no circumstances where human rights abuses or modern slavery is acceptable. We respect recognised international human and labour rights and have a zero-tolerance stance on modern slavery.

It is our responsibility to understand the risks of human rights abuses within our own business and supply chain and ensure ongoing management of those risks. We are guided by the principles and standards set out by a number of international bodies, such as the United Nations and International Labour Organisation.

Any concerns regarding human rights and modern slavery within SSE's direct operations or supply chain activity should be immediately reported through the appropriate channels.

## DILEMMA

**I work for SSE Thermal and regularly visit one of our major construction sites. I have noticed many new labourers on site, apparently working for a tier 3 contractor, and they appear to speak only to their supervisor, they avoid eye contact with the other contractors on site and they keep themselves to themselves. Could anything be wrong?**

Without knowing more, it is difficult to be certain, but this might be an example of forced or bonded labour (also known as modern slavery). This is more common than you might think. So you are right to identify the risk, and when you are on site, the best thing to do is to sensitively ask questions of the site manager about the company employed, and if there are any concerns. The first priority is to make sure the labourers are safe and if there are concerns, then the issue should be escalated by the site manager to Group Security.

## RESOURCES AVAILABLE

- Group Human Rights Policy
- SSE's Modern Slavery Statement
- Sustainable Procurement Code





# INCLUSION AND DIVERSITY ENCOURAGING DIFFERENCE

## What is inclusion and diversity?

Across SSE, we are focused on building an inclusive and diverse team of people with a shared commitment to contributing positively to a great place to work, an ethical business and a successful company. This means employing people with a balance of skills, knowledge, experience, education and industry backgrounds and respecting and supporting all of the different characteristics that are protected under equality legislation, complying with its spirit as well as its letter.

## Why is this important for business ethics?

A diverse workforce means there is a breadth of difference that supports our ability to better reflect the customers we serve and the stakeholders we depend on and to achieve all of our business goals.

An inclusive workplace makes sure we are fit for the future by becoming attractive to the entire available workforce, regardless of their background or characteristics protected under equalities legislation; allowing them to develop meaningful careers in an environment that is personally supportive and professionally fulfilling.

## What are the right behaviours?

- We respect and actively seek the views of everyone and listen to what everyone has to say.
- We are self-aware and look to understand differences so that we can behave in an inclusive way that respects others.
- We look to recruit from all areas of society and are actively engaged in changing society's perception of working in the energy industry.
- We do our best to create an environment where everyone feels supported, regardless of their difference.

## DILEMMA

**You are having a discussion about current affairs with colleagues and some views are expressed which you consider to be offensive to someone else present. You notice that person withdrawing from the conversation.**

Even if you are not personally affected by the views expressed, you can still raise your concerns with the people involved or with your line manager. If you don't feel comfortable with this, you can raise it with AskHR or call the Speak Up helpline. Often, situations like this can be resolved informally through positive communication and education.

## RESOURCES AVAILABLE

- SSE Employment Policy
- SSE Inclusion and Diversity Sharepoint site
- Ensuring Inclusive Behaviour at SSE
- Access the HR Hub from ssenet
- Yammer – Belonging at SSE Groups



# BULLYING, HARASSMENT AND DISCRIMINATION

## BEING RESPECTFUL

### What is bullying, harassment and discrimination?

Bullying, harassment and discrimination relates to treating people in a negative way. Discrimination specifically refers to treating people differently for a specific reason, for example because of their age, disability, gender identity, marriage and civil partnership/ status, pregnancy, maternity or family status, race (which includes colour, nationality and ethnic or national origins), religion or belief (which includes political opinion in Northern Ireland), sex or sexual orientation or membership of a travelling community.

### Why is this important for business ethics?

We must make sure our workplaces are free from discrimination, bullying and harassment so we promote an environment where our employees treat everyone as they would like to be treated themselves. That means we must treat each other, including people we work with from other organisations, with fairness, dignity, respect and openness.

### What are the right behaviours?

At SSE we do not tolerate any form of bullying or harassment, whether in person or using any communication platform, which is personally offensive, socially unacceptable and fails to respect the rights of others. It's the responsibility of all of us who work for SSE to provide a safe, engaging and inclusive working environment, and to observe the clear standards of conduct that apply to every one of us employed by SSE – up to, and including, the Chief Executive, as well all other members of the Board. Anyone experiencing harassment at work should raise it with their line manager, but if that is not appropriate Speak Up and call Safecall. Anyone speaking up can expect their issue to be treated sensitively and, where appropriate, be offered counselling.

### DILEMMA

**I've just joined a new team with a very aggressive working culture. One of the members of the team is constantly picked on, and I'm scared they will pick on me next. What should I do?**

You have the right to challenge unacceptable behaviour directly with the people involved or with your line manager. If you don't feel comfortable with this, you can raise it with the local HR manager, or call the Speak Up helpline.

### RESOURCES AVAILABLE

- Group Employment Policy
- SSE Grievance Procedure
- Access the HR Hub from ssenet
- SSE Bullying and Harassment Procedure (UK & NI)
- SSE Bullying and Harassment Procedure (ROI)



# THE LIVING WAGE AND LIVING HOURS

## What is the Living Wage?

SSE has been an accredited real Living Wage employer in the UK since 2013 and has paid its Irish employees the Irish Living Wage since 2016. The Living Wage is a voluntary rate of pay calculated using a robust and independent methodology (published by the Living Wage Foundation in the UK and the Living Wage Technical Group in Ireland) as a rate someone needs to earn to live a decent life. It is different to the UK Government's National Minimum Wage and its enhanced rate for the over-23s, called the national living wage.

## What are Living Hours?

Living Hours is an initiative from the Living Wage Foundation, aimed at tackling insecurity over working hours. In March 2021, SSE became one of the first companies in the UK to become an accredited Living Hours employer, underlining its commitment to providing workers with secure, guaranteed working hours alongside the real Living Wage. The Living Hours initiative holds employers to a series of commitments which include providing workers with at least:

- Four weeks' notice of shifts
- A contract that accurately reflects hours worked
- A contract with a guaranteed minimum of 16 hours a week

## Why is this important for business ethics?

As well as being a decision which is good for business, we believe paying everyone that works for us – including those that work on our behalf – at least a rate on which they can live a decent life and providing security of working hours is the right thing to do.

## What are the right behaviours?

Everyone who works for SSE directly is paid at least the real Living Wage, with annual increases implemented from 1 April each year in the UK and following the annual announcement from the Living Wage Technical Group in Ireland. Our suppliers should be aware of SSE's commitment to paying the real Living Wage to people working regularly on our sites in the UK, and have a responsibility to ensure these workers receive at least the real Living Wage while working on behalf of SSE.

All direct SSE employees should be given four weeks' notice of shifts and a contract with a guaranteed minimum of 16 hours a week (unless requested otherwise) and which accurately reflects hours worked. SSE is going through the process of rolling out the Living Hours requirements across its supply chain.

## DILEMMA

### What should I do if I'm not receiving the Living Wage or Living Hours?

If you, or anyone you know who works directly for SSE, or is contracted regularly to SSE in the UK (other than trainees), is receiving a rate of pay that is less than the Living Wage or does not have a contract which reflects the minimum standards under Living Hours, you should immediately let the team at SSE know by emailing [AskHR@sse.com](mailto:AskHR@sse.com) if you are an SSE employee or by emailing [livingwage@sse.com](mailto:livingwage@sse.com). You can also call the Speak Up hotline.

## RESOURCES AVAILABLE

- Visit [www.livingwage.org.uk](http://www.livingwage.org.uk) for information about the real Living Wage and Living Hours.



## || PART 4: ENGAGING WITH STAKEHOLDERS **BEING OPEN AND ACCOUNTABLE**

SSE's stakeholders are people, communities and organisations with an interest or concern in SSE's purpose, strategy, operations and actions and who may be affected by them. To do business ethically, we aim to go further and pro-actively engage with stakeholders, who are critical to our success, in an open and accountable way. Our key stakeholder groups include: energy customers; shareholders and lenders; government and regulators; suppliers, contractors and partners; NGOs, communities and civil society; and employees.

### **Part 4 covers:**

- Providing accurate information
- Political and regulatory engagement
- Media and communications
- Tax transparency



# PROVIDING ACCURATE INFORMATION

## KEEP GOOD RECORDS

### What is accurate information?

Accurate information is about keeping a correct and complete record of operational and financial information and decisions, so that our key stakeholders are able to rely on what we at SSE say. It's about being able to respond in a responsible way to requests for information from customers, regulators, shareholders and all other stakeholders.

### Why is it important for business ethics?

Customers, regulators and shareholders all make decisions and take action based on information provided to them by us at SSE, so we must make every effort to ensure that information is accurate. If we accidentally or deliberately provide incorrect or incomplete information, it could have a negative impact. This could be a loss of confidence on the part of stakeholders like shareholders and customers or penalties imposed by regulators. It will make people less likely to want to do business with SSE.

### What are the right behaviours?

Understand the operational, financial and other information that needs to be maintained to be provided to stakeholders. Keep a record of the reasons for important decisions affecting stakeholders.

Make sure that there are good processes in place for collecting, checking and maintaining that information, in a secure way. Co-operate constructively with any internal and external reviews, audits and investigations.

Highlight immediately any inaccuracies or incompleteness in records. Support colleagues who highlight issues with information accuracy – and don't commission or assist with any 'cover-up'.

## DILEMMA

**I helped put together the response to a request for information from one of our regulators. I've since found a couple of minor errors that I don't think anyone else will notice. What should I do?**

Highlight immediately to your line manager and any other colleagues involved that you have identified the errors. As individuals, we can't judge by ourselves whether they are minor or not, and as a company we have to make sure we comply fully and accurately with requests for information from regulators. Highlighting the errors will enable that to be done.

## RESOURCES AVAILABLE

- Group Employment Policy
- SSE Grievance Procedure
- Access the HR Hub from ssenet



# POLITICAL AND REGULATORY ENGAGEMENT

## OPENNESS AND TRANSPARENCY

### What is political and regulatory engagement?

Many of us at SSE are required to engage with regulators, non-departmental public bodies and institutions of government to do our jobs.

### Why is this important for business ethics?

We understand the importance of freedom of information and the requirement for transparency in relation to companies' dealings with government and regulators.

### What are the right behaviours?

At SSE we maintain the highest standards of probity in our dealings. We work in line with regulation and legislation and, where applicable, to relevant best practices to ensure any representations made by us are fair and balanced and represent the position truthfully and honestly.

We remain neutral towards political parties and do not contribute to political parties or political campaigns; and we avoid doing anything that could be construed in any way as solicitation of favour.

### DILEMMA

**Our colleague knows the local MP and has asked us to lay on a visit so the MP can meet people and promote SSE on the back of the visit. This seems like a good idea. Is it OK to arrange the visit?**

Its generally a good thing to welcome MPs and other elected representatives to SSE sites, provided the visits are safe and don't interrupt essential, time-sensitive operations. But, all visits should be organised via SSE's Corporate Affairs teams, with a good record of the visit and the issues discussed maintained. So, any approach from an MP or other elected representative should go straight to the Corporate Affairs team. Any approach from a Regulator should go to the Regulation Team in the same way.

### RESOURCES AVAILABLE

- Group Political and Regulatory Engagement Policy



# MEDIA AND COMMUNICATIONS

## REPRESENTING THE COMPANY AND OURSELVES

### What is media and communications?

There are many different methods of communication. Social media platforms include channels such as Facebook, Twitter, YouTube and LinkedIn, while other types of media include broadcast, electronic and print. These are all used by SSE to communicate, discuss and share information and as a means of engaging with stakeholders.

### Why is this important for business ethics?

Effective internal and external communications are essential to the success of any organisation that operates in the public eye and has a wide range of stakeholders. We want to ensure that the information we disclose is timely, accurate, comprehensive and relevant.

The lines between our personal lives and work lives can easily become blurred when using social media in particular. It is important that, when representing the company, we conduct ourselves in a way that maintains SSE's values and high standards. Social media posts may be used by our stakeholders or the public for positive or negative reasons.

### What are the right behaviours?

It is important that we do not use the company's external communication platforms unless we've been trained and have the right approval. If you are considering using social media or other media channels in a business capacity, or have been contacted by someone in the media such as a journalist, you should seek advice and approval from the media team first.

When using social media in a personal capacity, always ensure that it is clear that your comments are your own and not those of SSE. You should always be careful when posting on social media and speak to the media team if you are unsure about your own posts or those of a colleague.

### DILEMMA

**I'm interested in discussions around climate change and spend a lot of time on social media commenting on Twitter, blogs and online news sites. My personal views don't always align with SSE's. Is this still OK?**

Anything you do or say on social media has to be in a personal capacity, unless it is your job to engage on behalf of SSE in this way. At the same time, as an employee of the Company, anything you say about SSE on social media, despite being a personal comment, could be linked back to you in your role. It is important to be consistent with our values, obligations and the rules we have as a company. It's therefore wise to err on the side of caution.

### RESOURCES AVAILABLE

- Media Procedure
- Social Media Procedure



# TAX TRANSPARENCY

## PAYING A FAIR SHARE

### What is tax transparency?

SSE is subject to requirements around tax reporting under UK company law and fully discloses its tax affairs in its Annual Report according to accounting standards and the enhanced disclosure requirements of the Fair Tax Mark. SSE has been Fair Tax Mark accredited since 2014 – an independent third-party accreditation that demonstrates SSE pays the right amount of corporation tax, in the right place, at the right time.

### Why is this important for business ethics?

SSE believes that tax conduct is linked to trust in big business and that openness about our tax affairs is essential if we are to be a company that does business ethically and that people can trust. Clear and transparent disclosure is key for SSE's stakeholders to understand the taxes that it pays and its approach to tax practices.

### What are the right behaviours?

We take pride in paying our fair share of tax. Our primary objective from a tax perspective is to be compliant with all tax legislation requirements.

That's why we operate within both the letter and the spirit of the law at all times and don't use artificial tax avoidance schemes or tax havens to reduce the company's tax liabilities. But we do make timely and accurate returns which reflect our fiscal obligations to government.

At the same time, we do not help our customers, suppliers and anyone else we work with to fraudulently underpay, or not pay, tax.

### DILEMMA

**A supplier has asked me to pay an invoice they have issued to us that is in another company's name, to reduce their tax liabilities. Is that okay?**

Under the Corporate Criminal Offence Act 2017, it is illegal for a company to facilitate tax evasion. Knowingly paying an incorrect invoice could assist in facilitating tax evasion. Taking that action could therefore result in SSE being prosecuted.

### RESOURCES AVAILABLE

- Group Taxation Policy
- Talking Tax booklet





## DOING BUSINESS ETHICALLY FOR OURSELVES

This guide summarises for all of us at SSE what it means to work with stakeholders, trade fairly and stay safe and secure. If we do these things, we are doing business ethically; and if we do business ethically we will be in a much stronger position to create value for shareholders and society.

Doing business ethically means we are able to enjoy our jobs, sleep soundly at night, and make a positive contribution to the economy and society. So while doing business ethically is great for SSE; it's even better for each of us personally and for the people who depend on us.





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If you have any comments or queries about this guide, please get in touch with the SSE Sustainability Team at [sustainability@sse.com](mailto:sustainability@sse.com)

