

# Group Whistleblowing Policy

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## Policy statement

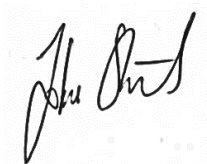
SSE's Whistleblowing Policy is that all employees are free to report wrongdoing, fraud or malpractice without impunity or fear of repercussion.

## Policy purpose

This policy is intended to protect SSE and its stakeholders from the material risk posed by personal or collective wrongdoing. It underpins the principle of "if it's not right, we don't do it" that is described in the Guide to Ethical Business Conduct for SSE Employees.

SSE is committed to conducting its business with honesty and integrity and in compliance with all applicable laws and regulations and its responsibilities as a publicly listed company.

This policy is owned by the Director of Human Resources 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.



**John Stewart**

Director of Human Resources



**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:

Speaking Up	<ul style="list-style-type: none"> <li>• SSE is committed to conducting its business with honesty and integrity and in compliance with all applicable laws and regulations.</li> <li>• SSE seeks to ensure that all employees have the confidence to report any concerns, that people who report wrongdoing, fraud or malpractice in the workplace are fully supported and that any issues identified are appropriately dealt with.</li> <li>• Employees need to speak up when they have observed actions that have (or could) lead to:             <ul style="list-style-type: none"> <li>○ Endangerment of customers, colleagues, contractors or the general public</li> <li>○ A criminal offence being committed</li> <li>○ Breaches of legislation or regulation</li> <li>○ Damage to the environment</li> <li>○ Abuse of company property</li> <li>○ Concealment or covering up of wrongdoing</li> </ul> </li> </ul>
Communication Channels	<ul style="list-style-type: none"> <li>• There are clear channels for employees to escalate concerns about wrongdoing through line managers and the Board's five sub-committees.</li> <li>• Employees who feel this route is not possible are encouraged to report issues relating to their working environment in a safe and secure way via an external service provider (SafeCall).</li> </ul>
Anonymity	<ul style="list-style-type: none"> <li>• SSE employees can raise their concerns on an anonymous and confidential basis without fear of any recrimination or adverse impact in doing so.</li> </ul>
Action and Aftercare	<ul style="list-style-type: none"> <li>• When Speak Up incidents are reported, either internally or externally, they are always treated in good faith and referred to SSE's Group Security and Investigations team for triage, assessment and allocation for investigation. SSE's priority is to build trust with people who speak up, allow for active communication and to ensure that all individuals involved in allegations are adequately cared for throughout the lifecycle and beyond of any particular case.</li> </ul>



## ROLES AND RESPONSIBILITIES

This policy applies to all SSE employees and staff working in our sites.

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.

**Business Unit MD's** and **Directors** are expected to set the tone for good ethical business conduct and demonstrate behaviours that set the highest possible standards for managers, employees and contractors.

**Managers** are responsible for making sure that their teams understand and comply with the policy and supporting procedures as well as complete any relevant training. They are expected to promote a working environment in which people feel confident to report wrongdoing, fraud or malpractice.

**Employees and contractors** working on SSE's behalf must comply with the policy and supporting procedures.

Group Security and Investigations are responsible for the triage, assessment, allocation and tracking to closure of issues raised through all Speak Up channels.

**SafeCall** is a specialist third party provider responsible for dealing in confidence with Speak Up concerns raised by SSE employees or contractors working on SSE's behalf.



## 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.

There are clear channels for employees to escalate concerns about wrongdoing through line managers and the Board's sub-committees.

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.





## TRAINING

SSE has an Ethics and Compliance eLearning programme for key topics to ensure we are all aware of our responsibilities for doing the right thing.

There is no specific training however the Whistleblowing Policy is referenced in all SSE Group Policies, in a number of mandatory training packages and is supported by an annual employee communication plan.



## SPEAKING UP

SSE takes pride in its reputation as a responsible company with a strong commitment to always do the right thing. SSE's core values – Safety, Service, Efficiency, Sustainability, Excellence and Teamwork – guide the actions employees take on the Company's behalf and the "decision tree" in the Guide to Ethical Business Conduct for SSE Employees helps people through ethical dilemmas. Bad things do, however, sometimes happen in good companies.

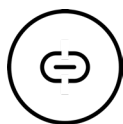
Speak Up reports made falsely, maliciously or for personal gain could result in disciplinary action. If an employee takes a concern to a mainstream or social media outlet, without following the appropriate channels it is unlikely that they will be given any protection against repercussions.

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

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)



## SUPPORTING DOCUMENTS

SSE's guide to ethical business conduct [Doing the Right Thing](#) sets out clearly the behaviours and standards expected of all of our employees.

Further guidance including a list of Speak Up ambassadors can be found in

- PR-COR-005 [Speak Up Procedure Whistleblowing](#).



## DEFINITIONS

**Whistleblowing** is the act of exposing information about unethical or illegal activity within an organisation.

At SSE, whistleblowing is referred to as “**speaking up**” and it is supported by an independent, third-party service provider, **SafeCall**, that people can go to anonymously to raise concerns.

**Wrongdoing** covered by this policy refers to any genuine concern about decisions or actions that are contrary to SSE's code of ethical business conduct. This policy does not cover minor HR concerns or personal grievances.



[www.safecall.co.uk](http://www.safecall.co.uk)

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