

# Group Political and Regulatory Engagement Policy

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## Policy statement

SSE has a policy of maintaining the highest standards of probity and respect in its dealings with regulators, politicians, non-departmental public bodies and the institutions of government, recognising their key role in the sector in which SSE operates.

## Policy purpose

This policy is to ensure that all of SSE's stakeholders can have confidence in and respect for its approach to regulatory and political engagement.

This policy is owned by the Managing Director of Corporate Affairs, Regulation and Strategy 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.



**Sam Peacock**

Managing Director of Corporate Affairs,  
Regulation and Strategy



**Martin Pibworth**

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:

|                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Politically Neutral    | <ul style="list-style-type: none"> <li>SSE remains party politically neutral and works constructively with Government Ministers, politicians, officials, regulators and non-departmental public bodies in jurisdictions in which it has operations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Engage with Integrity  | <ul style="list-style-type: none"> <li>SSE maintains the highest standards of probity and transparency in its dealings with government and opposition parties in line with industry best practice and aligns to the codes of conduct that are expected, and in some cases legislated for.</li> <li>SSE makes representations to regulators, politicians, non-departmental public bodies and the institutions of government in a fair and balanced way, so that any employee advocating on SSE's behalf must represent its position truthfully and honestly.</li> <li>SSE employees will not offer or give any financial or other incentive to any person in public life, whether elected, appointed or co-opted, or any connected person or persons, that could be construed in any way as a bribe or solicitation of favour. Employees must also not accept any financial or other incentive, from whatever source, that could be construed in a way as a bribe or solicitation of favour.</li> </ul> |
| Transition to Net Zero | <ul style="list-style-type: none"> <li>SSE will only conduct lobbying and advocacy activity that is in line with the goals of the Paris Agreement and its own net zero strategy and ambitions, both aligned to limiting global temperature rises to 1.5°C.</li> <li>SSE advocates for accelerated progress towards net zero through trade associations and industry representative bodies and will work constructively with them to ensure the advocacy they undertake aligns with SSE's net zero commitments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Open and Transparent   | <ul style="list-style-type: none"> <li>SSE complies with any disclosure requirements of the countries where it has operations and publishes detail on its trade association memberships and their alignment with SSE's principles on climate change.</li> <li>SSE's default approach is for all meetings to be undertaken with members of the Corporate Affairs or Regulation teams present so that meetings and commitments can be minuted. Where this is not possible, it is the attendee's responsibility to provide internal reporting to colleagues.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                   |

- SSE's principles of engagement are set out in the publicly available Political Engagement Statement and political engagement policy and procedures are available to all interested parties upon request.



## ROLES AND RESPONSIBILITIES

This policy applies to all SSE employees and contingent workers. It is relevant to people contracted to provide services to the Company through third parties and SSE's Joint Ventures.

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 understand and comply with the policy and supporting procedures as well as complete any relevant training.

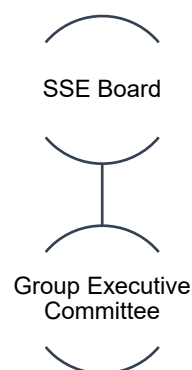
**All employees** must comply with the policy and supporting procedures. Any employee engaging with regulators, politicians, non-departmental public bodies and the institutions of government must be aware of SSE policy and procedures and approach **Regulation** (Distribution, Group, Energy Businesses and Transmission as appropriate), who oversee all engagement with regulators, and **Corporate Affairs**, who oversee all engagement with the institutions of government, to ensure the appropriate guidance on their responsibilities and the expectations on how they will represent the company can be provided.



## 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.





## TRAINING

SSE has dedicated teams responsible for engaging with governing and regulatory bodies for whom this policy is most relevant.

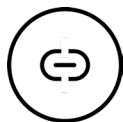


## SPEAKING UP

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 SpeakUp using:

- Phone (Code 131757):
  - UK - 0800 022 4118
  - Ireland - 1800 800 636
- <https://sse.speakup.report/speakupline>

*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:

- Political Engagement Statement
- Regulatory Engagement and Record Keeping
- Handling Requests for Information from Regulatory Authorities



## DEFINITIONS

**Institutions of Government** means all central, regional and local government bodies and agencies, public bodies and political parties in SSE's areas of operation and activity.