

Group Political and Regulatory **Engagement Policy**

Policy statement

SSE has a policy of maintaining the highest standards of probity and respect in its dealings with regulators, 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 Director of Strategy and Corporate Affairs 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.

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Alistair Phillips-Davies Chief Executive Officer

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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:

| Political Engagement | SSE remains party politically neutral and works constructively with Ministers, elected representatives, officials, regulators and non-departmental public bodies in which it has operations. SSE maintains the highest standards of probity and transparency in its dealings with government in line with industry best practice and aligns to the codes of conduct that are expected, and in some cases legislated for. |
|--------------------------|--|
| Regulatory Engagement | SSE makes representations to regulators, 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. |
| Transparency | SSE does not make any financial contribution to a political party, political campaign or elected representative. 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. Our political engagement policy and procedures are available to all interested parties. |

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.

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, non-departmental public bodies and the institutions of government must be aware of SSE policy and procedures and approach **Regulation** (Markets or

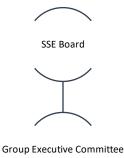


Networks as appropriate), who oversee all engagement with regulators, and **Corporate Affairs**, who oversee all engagement with the institutions of government, to ensure the appropriate guidance on their responsibilities and the expectations on how they will represent the company can be provided.



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.







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



If you see or hear something that falls short of our expected high standards of ethical conduct and compliance you should be able to discuss it with your manager or a Speak Up Ambassador, but when that is not possible you are encouraged to raise issues with SafeCall through the following channels:

- Phone: 0800 915 1571 (UK) 1800 812 740 (Ireland)
- Email: <u>sse@safecall.co.uk</u>
- <u>www.safecall.co.uk/report</u>



Additional documents available to provide further guidance and support include:



- Political Engagement Statement 2019
- PR-REG-006 Regulator Engagement Procedure
- WI-REG-006 Regulation record keeping
- PR-REG-006 <u>Regulator Engagement Procedure</u>
- WI-REG-009 Handling requests for information from Regulatory Authorities



• **Institutions of Government** means all European, United Kingdom, English, Welsh, Scottish, ROI and Northern Ireland central, regional and local government bodies and agencies, public bodies and political parties.

Comments and feedback on this policy and its application are welcome.