

# Code of Conduct

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## Foreword

We are a company with an opportunity to deliver great things. We've outlined this in The Better Plan – our plan to deliver Better Lives, Better Experience and Better Energy for all of society.

Our society depends on energy to live, work, develop and grow. Our customers depend on us to produce enough affordable energy – and to do it in a sustainable way. And we depend on our people to help us take on new challenges and fulfil our ambitions.

To deliver our plan, we need employees who will:

- care for each other, making safety our number one priority;
- strive for excellent performance;
- put social and environmental responsibility at the heart of everything we do;
- act with integrity;
- work as one team, one company – valuing the diversity of our people.

We must act with openness, integrity and accountability and always to high standards of behaviour and good business practice. This is vital to showing that we are a company that acts honestly, ethically and does the right thing.

This Code of Conduct sets out our expectations of our employees in terms of their behaviour. It cannot cover every situation that may be faced; however we simply should remember that we must always act in a way that is right, and which we would be comfortable to disclose. If we are ever unsure of what is “right”, or whether a decision is ours to make, then we should ask for guidance.

Please familiarise yourself with this document – both the Code and its Annexe. If you have any questions please discuss them with your manager.

Thank you for your support.



Simone Rossi  
Chief Executive Officer  
**EDF Energy Ltd**

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## 1. Summary

The purpose of the Code of Conduct is to advise employees of EDF Energy's expectations in respect of conduct.

It is essential that employees comply with this Code in order to promote good business practice and positive employee behaviour which will benefit the Company, its employees and its shareholders. Breach of the Code may lead to investigation and potential disciplinary action, including summary dismissal.

## 2. Scope

This Code of Conduct applies to all EDF Energy employees other than those working in joint venture companies where local policies may apply.

## 3. References

Relevant legislation, regulation and guidance from external organisations.

## 4. Code of Conduct

### Introduction

This Code of Conduct explains EDF Energy's basic approach to business conduct. The general rule is that all employees should behave in a way that protects the interests of the Company, their colleagues and the environment. They are required to comply with their contract of employment and the Company's policies and procedures. Policies and procedures can be obtained from the employee's manager, the Intranet or Employee Services HR.

It isn't possible to outline here the infinite variety of situations that employees may face in the normal course of business. Therefore, it is important for employees to see the Code of Conduct as a set of principles and to apply them in every situation at work, at a work-related event and outside of working hours when they are identifiable as an EDF Energy employee through their clothing, equipment or vehicle. Breach of the Code by employees may result in disciplinary action, including summary dismissal.

The Company reserves the right to revise the Code of Conduct from time to time in order to reflect changes in the law, best practice or the way in which EDF Energy conducts its business. The Company will consult with the recognised trade unions on any change to approach.

Additional supplementary information is provided by the Company in the Annexe to this document.

### Working together

#### 4.1 Health and Safety

Whilst working for EDF Energy, all employees are required to comply with all relevant health and safety, and nuclear safety, procedures and regulations and associated policies within the Company.

EDF Energy believes that all harm is preventable therefore its aim is Zero Harm. To assist the Company in achieving this aim, all employees are required to work in a safe manner, to report all unsafe conditions (including damaged Personal Protective Clothing or Equipment) and to intervene if they see other employees, temporary workers or managed service workers working unsafely. They must advise their manager if they are concerned that their state of health may cause a safety risk to themselves or others. If they feel unable to discuss their situation with their manager, they may contact Occupational Health instead.

Approved Personal Protective Clothing and/or Equipment (PPE) will be provided according to the needs of the job. If an employee is required to wear and/or use PPE to enable them to carry out their duties safely or to visit a location then all of the designated PPE must be worn and/or used in line with specified practice.

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## 4.2 Behaviour towards others

Whilst employed by EDF Energy, employees should treat their colleagues and any other person with whom they come into contact with respect and dignity.

## 4.3 Equal opportunities, diversity and inclusion

EDF Energy welcomes the breadth of perspective that employment of diverse individuals can bring and promotes an inclusive and open workplace where everyone can be themselves and do their best. It is fully committed to a policy of fairness and equality for all job applicants, employees and others who work for it, irrespective of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sex, sexual orientation, religion or belief. This approach to fairness and equality also applies to employees who are members or non-members of a trade union, part time workers and those on a fixed term contract. EDF Energy's approach to diversity and inclusion goes beyond fulfilling its legal commitments and the Company wants all employees to be treated fairly, respected and included in the workplace

Further information on the Company's approach to this matter can be found in the EDF Energy HR Policy: Equal Opportunities and on the Diversity & Inclusion pages of the Intranet.

## Maintaining an ethical approach

### 4.4 Customer relations

When dealing with customers, potential customers, members of the public or any other person, in the course of their job, employees should always conduct themselves with integrity. When interacting with, or deciding on a course of action which impacts on customers, employees must behave in a fair, professional, appropriate, transparent and honest manner to give the best possible experience.

### 4.5 Relationships with competitors

EDF Energy aims to compete vigorously in the marketplace. None of its employees are allowed to collude with competitors. Any collusion may, in addition, contravene competition laws and have serious consequences for the Company.

It is EDF Energy's policy to sell products and services on their merits, therefore competitors and their products or services should not be disparaged. Employees should not divulge confidential Company information to a competitor or any third party, either directly or through making commercially sensitive information public.

Employees should be scrupulous in observing legal and ethical standards in seeking information about competitors and in competing against them.

### 4.6 Contact with political parties or politicians

Employees must not make a donation of any kind to any political party for or on behalf of the Company and cannot be reimbursed by the Company for political contributions made personally.

Employees must not undertake any work on behalf of any political party during work time, whether under Company initiatives such as Force for Good volunteering activities or otherwise.

Employees must contact the Communications team:

- in advance of any contact with elected representatives of democratic institutions (Members of Parliaments, Assemblies, councils, etc) on behalf of the Company, to obtain clearance for such contact;
- in advance of incurring any expenditure with a political party on behalf of the Company, such as the purchase of tickets to political dinners, to obtain clearance for such expenditure;
- to obtain clearance for handling complaint letters from elected representatives, ensuring these are handled in accordance with the specific processes attached to such matters; and
- to report any communication entered into, in the course of their job, with an MP (or other politician).

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## 4.7 Bribery, fraud and tax evasion

Put simply, EDF Energy employees are required at all times to act honestly and with integrity in the course of their work. They must not engage in bribery, fraud, tax evasion or the facilitation of tax evasion.

EDF Energy operates a policy of zero tolerance to bribery and fraud and to tax evasion or the facilitation of tax evasion by its workers or third party representatives. Bribery is a criminal offence and includes the actual or attempted provision or receipt of an inducement or reward for improper performance of a function by the recipient. Tax evasion is the illegal non-payment or under-payment of taxes and is a criminal offence which can be committed by an individual or a legal entity. The facilitation of tax evasion is being knowingly concerned in or taking steps intending to assist in another person's tax evasion.

The term "fraud" is used to describe such acts as deception, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. For practical purposes "fraud" maybe defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party. Attempted fraud may be treated as seriously as accomplished fraud.

The giving and receiving of modest corporate gifts or hospitality is a widely accepted business practice that, when used appropriately, can encourage and facilitate networking opportunities and the positive development of business relationships. However, there is a risk that some gifts or hospitality may expose employees to fraud and bribery or the perception of fraud and bribery. The Gifts and Hospitality Procedure sets out the company's expectations around the giving and receiving of offers of gifts and hospitality and the associated recording requirements. Employees should familiarise themselves with the Gifts and Hospitality Procedure and the Gifts and Hospitality Register. If they are offered or are considering offering gifts of hospitality, they must comply with the requirements of the Gifts and Hospitality Procedure.

The Company will provide employees with guidelines regarding fraud, bribery and tax evasion. Employees should familiarise themselves with, and comply with, the guidelines provided to them and, if in doubt about any course of action, they should consult their manager. Any concerns an employee may have with regard to a potential issue should be reported promptly to their manager, their Senior Leadership Team member or to the external reporting line explained in the EDF Energy Confidential Reporting of Serious Concerns Procedure.

## 4.8 Relationships with suppliers and prospective suppliers

Suppliers of goods and services to EDF Energy are an important resource and should be treated with fairness at all times. Employees should maintain the highest ethical standards in all matters of supplier dealings. This includes contract management and day-to-day contact. In particular, managers must ensure they act with integrity at all times and lead by example.

Before engaging with suppliers or prospective suppliers, employees must ensure that they are familiar with EDF Energy's Supply Chain Policy, associated Mandatory Practices and Standard Operating Procedures and that all engagements are compatible with the expectations of these documents.

EDF Energy's Supply Chain Policy and associated Mandatory Practices and Standard Operating Procedures detail the minimum standards of behaviour and conduct that are to be expected from all suppliers and their employees, together with the rules that apply to EDF Energy employees during any tendering process. Suppliers include professional advisers, consultants and other organisations doing or wishing to do business with EDF Energy.

## 4.9 Declaration of potential conflicts of interest

Any potential conflicts of interest arising for an employee must be discussed between the Company and the employee so that appropriate actions to mitigate any risk can be agreed and recorded.

Employees must contact their manager if they are planning to hold office in, be employed by, or engaged in, any business or organisation other than EDF Energy. Exceptions to this are:

- involvement in educational organisations e.g. being a member of a PTA or being a school governor;

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- voluntary roles in charities or non-business related clubs or societies, unless the individual is to be registered in the position with Companies House, or they perceive, or would reasonably be expected to perceive, that their involvement in that organisation could be seen to conflict with the aims and ambitions of EDF Energy;
  - involvement in trade union activities.

The employee and manager should discuss whether or not the activity could have, or could be perceived as having, a negative impact on the employee's effective and safe performance of their role within EDF Energy, or on the aims, ambitions or interests of the Company, agree any mitigating action if a potential conflict is identified, and document the discussion.

Other interests that may affect, or may be perceived as affecting, the employee's impartiality in the Company should also be declared to the employee's manager. Such interests need not necessarily be a business or financial one. Kinship, close friendship, membership of an association or society, trusteeship and many other kinds of relationship can sometimes influence an individual's judgment or give others the impression it might. A good test is to ask whether others would think the interest close enough to influence someone in the employee's position. In discussing it with their manager, they will reach a decision on whether or not a conflict exists or could be perceived to exist.

Employees must not knowingly have any direct or indirect interest in any other business or organisation, without EDF Energy's permission, if it might reasonably be considered to compete with EDF Energy or impair the employee's ability to carry out their duties or act in the best interests of EDF Energy. This would not affect shareholder assets of up to 3% of issued shares for the purpose of investment only.

#### **4.10 Environment**

EDF Energy is committed to managing its impacts on the environment, and to continual improvement. It complies with all applicable relevant regulations, standards and other codes of practice and sets high standards of performance, to be delivered through its policies and procedures, to protect the environment. The goal is to achieve environmental excellence throughout EDF Energy.

Employees have an obligation to comply with applicable environmental regulations, and to comply with the Company's policies and procedures which have been developed taking account of the limits and conditions set for EDF Energy's permits, consents, licenses and approved design and safety margins in order to ensure that the Company protects environmental safety. They are also responsible for openly reporting environmental performance, unsafe conditions/incidents and to intervene if they see other employees, agency supplied workers or managed service workers working in a manner likely to result in an unsafe act or environmental incident.

#### **4.11 Reporting serious concerns and improving ethical standards**

EDF Energy is committed to being open and transparent and to having high standards of integrity, behaviour and business practice. The Company expects and encourages individuals who have a serious concern about any aspect of the business to come forward and voice those concerns. If an employee suspects illegal activities or unethical conduct or anything that might prejudice the business (bribery, fraud, tax evasion, a failure to comply with legal obligations, a miscarriage of justice, a health, safety or environmental risk, including nuclear safety, modern slavery or any other improper activities), they should promptly report the situation to their manager, their Senior Leadership Team member or to the external reporting line explained in EDF Energy's Confidential Reporting of Serious Concerns Procedure.

EDF Energy also wants to improve continuously its standards of ethical behaviour. Employees are asked to raise any suggestions for improvement with their manager, their Senior Leadership Team member or their Human Resources Director.

### **Representing or discussing EDF Energy**

#### **4.12 Dress code**

Any local guideline issued in relation to appropriate dress must be followed. Employees are expected to dress in a manner that presents a smart, professional and appropriate image to their colleagues, suppliers, customers and members of the

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public, maintaining dignity and ensuring that their clothing does not create or increase any health and safety risks. Any corporate or protective clothing provided must be worn as specified.

#### **4.13 Writing or talking about EDF Energy or its business**

As a result of working for EDF Energy, employees may receive requests to comment or give interviews to the media, or to present at formal events such as conferences. Any such request should be discussed with their line manager, to confirm that there is no risk of disclosing company information which is Sensitive Nuclear, Export Controlled or otherwise confidential, and the Communications team. No response should be given without it having been cleared by both.

Employees may choose to talk or write about the Company or their work in their own time; but, they must ensure that they clearly state that the views expressed are their own and that they do not necessarily reflect the views of the Company. This includes writing in Web Logs (Blogs) or Wikis or participating in multi-media and social networking sites, such as Facebook, Instagram, Twitter, YouTube, LinkedIn or other online forums.

In either situation, employees have a continued obligation not to disclose any confidential information or bring the Company into disrepute. They should act in the best interests of EDF Energy and should take care not to damage their relationship, or the Company's relationship, with colleagues, customers or suppliers, the brand or the reputation of the Company.

EDF Energy's HR Policy: Social Media provides further information on the Company's approach to this matter.

### **Maintaining appropriate controls**

#### **4.14 Security**

EDF Energy is committed to the security of its people and the physical assets, information and systems that it utilises to undertake its business in the UK or whilst its employees are undertaking international business travel. The Company also has regulatory and legal obligations and has policies, standards and procedures in place to enable its compliance.

Employees must take appropriate steps to safeguard the security of themselves, their colleagues, Company assets, systems and information and report security concerns or incidents immediately.

#### **4.15 Data Protection**

Data protection legislation (such as the Data Protection Act and the General Data Protection Regulation) imposes important obligations on employers in terms of what information they may hold on individuals and how they may hold and use it. This includes restrictions on imparting personal and sensitive personal information. EDF Energy is committed to protecting the rights and privacy of individuals in accordance with these laws.

EDF Energy takes the issue of data protection, security and confidentiality very seriously and has processes in place for the appropriate treatment of both computerised and paper data. Employees must meet their obligations to safeguard personal data of others, as explained in EDF Energy's privacy notice.

#### **4.16 Company records**

Employees should maintain accurate, timely and reliable records where required; these are critical to meeting the financial, legal, regulatory and management obligations of the Company and to being able to demonstrate necessary compliance. All reports, invoices, expenses, employment-related records and other operational records should be prepared promptly and honestly and must be treated appropriately. Records should be maintained in reasonable detail to reflect accurately and fairly the Company's activities and should be in line with the relevant policies and procedures.

#### **4.17 Confidential information**

In the course of their employment, employees may have access to confidential information about the Company, its current or former employees, customers, business affairs or dealings. This may include, but is not limited to, information that is not yet publicly known and which would affect the share price of EDF Group if it were made public.

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Unless they are authorised by their manager, or required to do so by their duties under their employment contract, employees must not divulge confidential information to any person or organisation or use it for their own benefit or gain. This obligation continues after their employment with EDF Energy ends. If an employee is uncertain as to whether a particular piece of information is deemed confidential they should check with their manager before disclosing it.

For the avoidance of doubt, misuse of confidential information includes “insider dealing”, i.e. dealing directly or via a third party in financial instruments (including shares or securities) or wholesale energy market products, on the basis of information that is not yet publicly known and which would affect their value if it were made public. Employees should be aware that, should they be found to have been insider dealing or abusing a market, they may face criminal prosecution as well as disciplinary action.

All confidential records, documents and other papers relating to an employee’s work or the Company which are in an employee’s possession or under their power of control are the property of the Company. In certain circumstances employees may be required to sign the Official Secrets Act or internal confidentiality agreements.

#### **4.18 Company property and resources**

Company property and resources available to an employee must be used only for work purposes unless clear arrangements are in place regarding their availability for personal use. All Company property allocated to the employee or in their possession should be treated with care and must be returned on leaving the Company. Company property and resources must be treated in accordance with the relevant policy or procedure e.g. on Email & Internet Usage or Telephony.

#### **4.19 Copyright infringement**

Employees should not download or reproduce any material (e.g. music, text, images) on Company systems, property or premises without complying with licensing, copyright or other conditions. Such action could result in legal proceedings, including criminal prosecution, not only against the Company but also against the individual who infringes copyright.

#### **4.20 Inventions, designs, etc.**

Employees must ensure that any intellectual property (for example, an invention, design, presentation or other work product) whether capable of being registered and/or protected, or not, created by them in connection with their employment with EDF Energy (whether or not in the normal course of business or during normal working hours) is made available to the Company. All employees must acknowledge and agree that all rights in any such intellectual property will belong to, or will be held in trust for, EDF Energy or its nominee.

## **5. Responsibilities**

<b>Role</b>	<b>Responsibility</b>
Chief People Officer	Owns the Code of Conduct and is responsible for obtaining agreement to it from the Business Unit Human Resources Directors and those in equivalent roles in Corporate Functions and for seeking approval from the Chief Executive.
Chief Financial Officer	Owns the Bribery & Anti-Fraud Framework and is responsible for ensuring that EDF Energy’s policy of zero tolerance to bribery and fraud is embedded within all Business Units and made known to all employees.

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Industrial Relations & Reward Director	Responsible for maintaining the Code of Conduct, ensuring that it is regularly reviewed and proposing any changes.
Business Unit Human Resources Directors and those in equivalent roles in Corporate Functions	Responsible for ensuring the Code is implemented and communicated appropriately within their respective business areas.
Executive Members	Have been delegated authority to make decisions within their business areas in operating this Code of Conduct. Further delegation of authority within business areas will be captured in local governance documentation.
Employee Services	Responsible for distributing the Code of Conduct to new employees.
Managers	<p>Responsible for demonstrating visible leadership in supporting the Company's values by acting with integrity.</p> <p>Responsible for providing employees within their team with guidance, education and training on their responsibilities, the decisions they can make and those that they can't, and the risks they are responsible for.</p> <p>Responsible for enforcing the Code of Conduct and taking appropriate action where it is alleged that any breaches occur.</p>
Employees	<p>Responsible for familiarising themselves with the Code of Conduct, raising any questions or concerns with their manager or with Human Resources, and complying with the contents and spirit of the Code.</p> <p>Responsible for ensuring that they understand their responsibilities, the decisions they can make and those that they can't, and the risks they are responsible for mitigating, and for seeking guidance and clarification where they are unsure.</p> <p>Employees must not assist others in activities, or direct or authorise others to perform activities, which would not be in compliance with the Code of Conduct. Neither must they have knowledge of, but fail to report, activities by others even if the employee did not benefit from the activity.</p>

## 6. Records

Records of any declared potential conflict of interest will be held on the employee's personnel file and on their personnel information system record. Personal data will be retained in accordance with EDF Energy's privacy notices ([www.edfenergy.com/yourprivacy](http://www.edfenergy.com/yourprivacy)).

## 7. Document history

Version	Date	Author	Comments
Version 1.0	01/06/04	Helen Whiteman	EDF Energy – Employment Policy Review
Version 2.0	01/10/04	Helen Whiteman	Updated: Executive Member responsibilities
Version 3.0	14/03/05	Helen Whiteman	Updated
Version 4.0	01/07/06	Helen Whiteman	Updated: Organisational changes & references
Version 5.0	23/10/06	Helen Whiteman	Updated: Organisational changes
Version 6.0	14/07/07	Helen Whiteman	Updated: Human Resources Director
Version 7.0	01/01/08	Helen Whiteman	Updated: General update & sections on Health & Safety, Fraud and Informal Representation of the Company introduced
Version 8.0	01/01/09	Helen Whiteman	Updated
Version 9.0	05/04/11	Helen Whiteman	EDF Energy - Employment Policy Review Replaces British Energy Code of Conduct (BE/POL/018) and British Energy Workplace Relations Policy (BE/POL/013)
Version 10.0	15/04/13	Helen Whiteman	Updated: Changes arising from annual review
Version 10.1	08/07/2014	Helen Whiteman	Updated: Changes arising from annual review
Version 10.2	16/11/2015	Helen Whiteman	Updated: Changes arising from annual review
Version 10.3	01/09/2017	Helen Whiteman	Updated: Changes arising from annual review
Version 10.4	08/01/2018	Helen Whiteman	Updated: Foreword and organisational changes
Version 10.5	16/07/2018	Helen Whiteman	Updated: Annual review
Version 10.6	25/03/2019	Helen Whiteman	Updated: Annual review

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## Annexe

### Supplementary Information

#### Code of Conduct

##### *Introduction*

To help determine whether a course of action is the right one, employees may find it useful to consider the following questions:

- Does my decision comply with legislation and regulations?
- Does my decision comply with EDF Energy's rules, policies and procedures?
- Is my decision consistent with EDF Energy's values?
- Have I evaluated the alternative courses of action possible and understood the consequences of each?
- Would my colleagues, family or close friends view my decision positively?
- Would I be comfortable if my decision was made public?
- Am I comfortable with my decision?

If the answer to any of these questions is "no", employees should discuss their concerns and seek advice before proceeding.

##### *Complying with Company rules, policies and procedures*

The Company's policies and procedures include some documents which apply to the whole Company, and some which only apply to specified groups of employees or business areas.

The Intranet has a section on Company Information\Company Policies which lists the Company-wide policies and supporting documents in place. The Intranet also has functional and business area-specific pages which, as well as holding this Company-wide information, hold rules, policies and procedures which are "local" i.e. applicable to defined groups within the organisation.

Employees should be made aware of all the relevant rules, policies and procedures that they need to know to be able to do their job within EDF Energy. If they are in any doubt, however, as to whether there are rules which they need to follow in any given situation, they should seek advice to clarify and confirm the situation.

##### *Behaviour towards others/Customer relations*

Employees should remember that incidents of misbehaviour could result in damage to their personal integrity and to their relationships. They should be aware that inappropriate behaviour may result in them facing civil or criminal charges personally, as well as disciplinary action within the Company.

In circumstances where customer behaviour makes dealing with them difficult, employees should remove themselves from the situation as sensitively as they can, and report the matter to their manager. Customer complaints will be regarded seriously and will always be investigated thoroughly with both parties.

##### *Relationships with competitors*

To try to ensure that all employees comply with competition law, EDF Energy has developed Competition Principles & Guidance which can be accessed on the Intranet (Company Information\Company Policies\Legal and Regulation Policy). Employees should take the time to familiarise themselves with the content of the document. If they have any questions

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concerning competition law, or the interpretation of the principles or guidance, they should contact the Legal Department who can provide assistance.

### ***Potential conflicts of interest – activities within another business or organisation***

In discussing potential conflicts of interest, the manager should obtain and review the full facts. Consideration should be given to the number of hours per week that will be spent by the employee on the secondary activity and any impact that this may have on the employee's fitness for work and health and safety of themselves and others within EDF Energy. To understand whether the activity proposed may be a conflict for EDF Energy, the manager may need to seek information from other Business Units regarding services provided. If the employee is a statutory director of an EDF Energy group company, EDF Energy's Company Secretary must be made aware of the potential external role before it proceeds.

In accordance with the Working Time Regulations, EDF Energy will not countenance a Young Worker being employed by another organisation if the total hours that they would work as a result would exceed 8 hours per day or 40 hours per week.

Employees should be advised that they are not to take actions in relation to the alternative activity during EDF Energy working hours, nor (where they have them) to use their EDF Energy telephone or email account or any other relevant EDF Energy equipment.

The template to be used for documenting the discussion is available from HR. Once it has been issued, a copy of the document should be sent to Employee Services HR who will arrange for it to be held on the employee's personnel file. They will also complete the necessary recording of the information on the employee's personnel information system record.

### ***Potential conflicts of interest - personal relationships***

Mitigating actions should be put in place before individuals with a personal relationship work together in circumstances whereby a conflict of interest, breach of confidentiality or unfair advantage may be gained or may be potentially perceived to be gained by the overlap in their personal and working relationships, or where the relationship may result in it being difficult for colleagues to challenge each other on unsafe acts.

It may be necessary in certain circumstances to change the working or reporting relationships in order to ensure that conflicts of interest, etc cannot occur or be perceived to occur. Full consultation with all parties involved will be taken to reach agreement.

As a general principle, there should not be a line management relationship between relatives, partners or friends. Where a personal relationship exists or develops between members of staff who are in a management/supervisory and subordinate relationship at work the senior member of staff ought not to be involved in any recruitment, selection, appraisal, salary review, promotion, grievance or disciplinary decisions regarding or involving the other party.

The relationship declared will not necessarily be with someone in the workplace, but may be with someone in another organisation resulting in the potential perception of inappropriate sharing of information or of influence being exerted. The manager and employee should agree mitigating actions in these circumstances.

### ***Data Protection/Confidential information***

It is important to be sensitive to the confidentiality of any information when travelling. Care should be taken to ensure that information on screens of laptop computers cannot be overlooked, and that data is stored and transported securely. Care should also be taken when using a mobile phone in public places, to avoid confidential information unwittingly being revealed.

Managers must ensure that any personal or sensitive personal data they hold relating to employees is kept securely, and is retained only for a relevant period before being filed on the employee's personnel file and/or confidentially destroyed.

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EDF Energy's privacy notices explain the Company's handling of personal data. These can be found at [www.edfenergy.com/yourprivacy](http://www.edfenergy.com/yourprivacy).

Further guidance on information classification, marking and handling requirements is available on the intranet as support to the Security Policy or from the relevant local Information Security team.

### ***Copyright infringement and brand***

Printed works, pictures and music will usually be subject to copyright. Unauthorised use of copyright places EDF Energy in a legally vulnerable position. With regards to social media and EDF Energy sites, replicating any more than an insubstantial amount of copyright text may violate copyright; reprinting without identifying the original author may also be considered plagiarism or otherwise violate the author's right of accreditation and intellectual property laws. If the printed works, pictures, music, video or images feature any copyright or trademark logos identifying it as from a source that has not marked it as free to use, share or modify, then it is unavailable. Any amount of copying may violate copyright law if the consent of the copyright owner has not been sought in advance.

EDF Energy invests a considerable amount of time and money in its own intellectual property. The Company is proud of what it produces and is delighted when an aspect of this work, such as Zingy, is adopted by the public. However, employees should be aware that videos and pictures, such as those of Zingy and the EDF Energy logo are subject to copyright. It's important that the Company's brand is protected and that employees treat the Company's intellectual property with the highest regard. EDF Energy's intellectual property mustn't be used in a way which may reflect derogatively on or embarrass the Company.

### ***EDF Energy's Communications Team***

A number of matters within the Code of Conduct require the involvement of EDF Energy's Communications team. They can be emailed on [media@edfenergy.com](mailto:media@edfenergy.com).