



## Company Policy: Ethics & Business Conduct

# 1 Company Policy: Ethics & Business Conduct

## Policy Statement

Achieving our mission means driving progress for people; being a successful and responsible long-term energy business, trusted by customers and powering a thriving society and a healthy environment.

EDF Energy is committed to being open and transparent and to having high standards of integrity, behaviour and business practice. These objectives are reflected in our ambitions:

- to achieve Zero Harm to people
- to be the best and most trusted for customers
- to deliver safe, secure and responsible nuclear electricity
- to achieve strong financial and ethical performance
- to power society without costing the Earth
- to empower our people to be a force for good

EDF Energy is committed to promoting and encouraging a culture of openness, integrity and accountability. It promotes good business practice and positive employee behaviour. This approach benefits the Company, its customers, its employees and its shareholders. All our employees should behave in a way that protects the interests of the Company, their colleagues and the environment.

EDF Energy supports the international commitments for the protection and defence of human rights of the United Nations and the International Labour Organization and reaffirms its adherence to the 10 principles of the Global Compact.

The Ethics & Business Conduct Policy sets out the standards for upholding ethical business practices and demonstrates our commitment to working with integrity, by being honest and transparent about our operations and performance. It establishes how appropriate and expected standards of behaviour will be set and communicated to enable EDF Energy to live its values, and is consistent with the EDF Group Code of Ethics.

EDF Energy employees are required at all times to act honestly and with integrity to safeguard the revenue, property and reputation of the Company and other Company assets for which they are responsible. Employees will be advised that they are expected to maintain the highest ethical standards and take appropriate action when others do not. The basic rule is that applicable legislation and regulations must be complied with.



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**Vincent de Rivaz CBE**, Chief Executive Officer  
For and on behalf of the EDF Energy Executive Team

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### Policy Standards

#### Our Approach/Framework

1. EDF Energy maintains a Code of Conduct that sets out what is expected of all employees in terms of behaviour. The Code of Conduct is implemented and appropriately communicated within all Business Units and Corporate & Steering Functions.
2. To ensure a consistent and comprehensive approach to legal and regulatory compliance, ethical standards and business conduct, company-wide documents set out the required standards of behaviour from employees which are appropriately communicated and deployed in all organisational areas.

#### Our Principles

3. EDF Energy operates a policy of zero tolerance to bribery and fraud and this culture is promoted and adopted across all organisational areas.
4. The EDF Energy Gifts & Hospitality Procedure explains the principles to be followed when rewards, benefits, gifts or hospitality are offered to or accepted by EDF Energy employees.
5. As an inclusive company, EDF Energy captures the value that difference brings. Principles and commitments are established in respect of diversity and inclusion.
6. Practices, procedures and guidance defining our commitment to comply with the Equality Act and promote equality within the workplace are established, appropriately communicated and applied.
7. EDF Energy fully supports the rights of all individuals to be treated with dignity and respect at work. Practices, procedures and guidance defining EDF Energy's commitment to prevent, discourage and deal with bullying and/or harassment are established and applied.
8. Alleged breaches of company policy and practices are investigated. Employees found to be in breach of the Company's policies and procedures are liable to action under the relevant Disciplinary Procedure.
9. EDF Energy encourages employees to disclose information on serious concerns they have about activities within the Company through its Confidential Reporting of Serious Concerns Procedure and supports EDF Group's commitments on ethical reporting.
10. EDF Energy conducts systematic risk assessments of potential breaches to ethical standards and has appropriate controls to mitigate the identified risks.
11. All managers are expected to demonstrate visible leadership in supporting the Company's ethical values by acting with integrity and taking action where breaches have taken place.

#### Our Community

12. EDF Energy is committed to ensuring the fair treatment of business and residential customers and has developed the Trust Test. The Trust Test is applied on all courses of action which directly impact our customers.
13. EDF Energy delivers appropriate programmes to support its customers who are most vulnerable by reason of old age, disability, chronic illness or financial insecurity.
14. EDF Energy's community and education initiatives deliver a range of projects that build links to communities and the education sector through employee volunteering, charity partnerships and our sustainable schools programme, the Pod.
15. EDF Energy encourages and supports employees who volunteer to participate in projects which align with our company ambitions.

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### References

- Agreement on EDF Group Corporate Social Responsibility
- EDF Group Code of Ethics
- EDF Energy Code of Conduct
- EDF Energy Gifts and Hospitality Procedure
- EDF Energy Confidential Reporting of Serious Concerns Procedure
- EDF Energy Standard of Conduct (Trust Test and the Feel Better Test)

### Change History

Version	Date	Changes Made
V1.1	22-03-2013	<ul style="list-style-type: none"> <li>• Updated: Organisational changes, template,</li> </ul>
V2	10-09-2013	<ul style="list-style-type: none"> <li>• Updated: EDF Group Code of Ethics reference, minor policy wording and branding updated.</li> </ul>
V3	01-05-2015	<ul style="list-style-type: none"> <li>• Updated policy following policy review: Includes Standards of Conduct and Trust Test.</li> </ul>