



Company Policy: Ethics & Business Conduct

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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 Better Energy Ambitions:

- **To achieve Zero Harm to people:** Our aim is Zero Harm to our people and the communities we serve.
- **To be the best and most trusted for customers:** We will be the best and most trusted energy company, known for helping customers.
- **To power society without costing the Earth:** We will lead the decarbonisation of the UK electricity sector whilst achieving an increasingly positive environmental impact across our operations.
- **To deliver safe, secure and responsible nuclear electricity:** We will continue to deliver the highest standards of nuclear safety in our existing and new build activity, and help shape long-term solutions to radioactive waste.
- **To achieve strong financial and ethical performance:** We will make strong and trusted financial and ethical performance central to how we do business – proving an essential service in a responsible way.
- **To empower our people to be a force for good:** We will inspire and enable our people to perform as a force for good, driving progress at work and across the communities we serve.

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 Ethics & Compliance Policy.

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.



Simone Rossi 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. 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 unlawful discrimination; bullying and/or harassment; and, violence in the workplace are established and applied.
6. 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.
7. 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.
8. EDF Energy conducts systematic risk assessments of potential breaches to ethical standards and has appropriate controls to mitigate the identified risks.
9. 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

10. EDF Energy is committed to ensuring we deliver fair outcomes for our customers by acting honestly, ethically and legally.
11. EDF Energy delivers appropriate programmes to support its customers who are most vulnerable by reason of old age, disability, chronic illness or through a change in circumstances such as bereavement or short term illness/injury which may also cause financial insecurity.
12. EDF Energy supports our people to do a diverse range of great things in the communities we serve, all of which are aligned to our sustainable and responsible business framework – The Better Plan.

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References

- EDF Group Ethics & Compliance Policy
- EDF Group Code of Conduct - Ethics and Compliance
- Finance Policy
- Health & Safety Policy
- People Policy
- Supply Chain Policy
- Sustainable Business Policy
- EDF Energy Code of Conduct
- EDF Energy Gifts and Hospitality Procedure
- EDF Energy Confidential Reporting of Serious Concerns Procedure

Change History

Version	Date	Changes Made
V1.1	22-03-2013	<ul style="list-style-type: none"> • Updated: Organisational changes, template,
V2	10-09-2013	<ul style="list-style-type: none"> • Updated: EDF Group Code of Ethics reference, minor policy wording and branding updated. Editorial changes approved by Dr Valerie Kohler
V3	01-05-2015	<ul style="list-style-type: none"> • Updated policy following review: Includes Standards of Conduct and Trust Test. Standard in relation to collaboration removed as covered by Sustainability Policy
V4	July 2018	<ul style="list-style-type: none"> • Updated policy following review: updates to Our Community standards and reference to the Better Plan, removal of reference to Diversity, Inclusion & Equality as covered by People Policy