

# DOING THE RIGHT THING

*Which way?  
The right way,  
the Severn Trent way.*



SEVERN

TRENT

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- Make sure nobody gets hurt or made unwell by what we do

# Welcome to the Severn Trent Way



*“Being trusted means... doing the right thing, every moment of every single day.”*

## Hello and welcome to ‘Doing the Right Thing, the Severn Trent Way’

At Severn Trent, our purpose is to serve our communities and build a lasting water legacy. We know that what we do really matters to the families, businesses and communities we serve – which is why our vision is to be the most trusted water company by 2020.

Being trusted means that, as well as delivering an outstanding customer experience, the best value service and environmental leadership, absolutely all of us need to be focused on living our values, by doing the right thing, every moment of every single day.

And that’s where we need your help!

At some point, all of us will find ourselves in a situation where difficult decisions need to be made. In lots of cases the right and wrong answers will be obvious but there’ll always be times when they’re not. And that’s exactly what this guide, full of handy tools and tips, is designed to help you with.

It can take just one bad decision to damage the trust that our customers, communities, investors, regulators and colleagues have in us, so please do take the time to read and review this guide regularly and help us to achieve our vision of being the most trusted water company by 2020.

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Best wishes  
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# What's Doing the Right Thing, the Severn Trent Way all about?

**Whatever our role and wherever we're based, there will always be times when we're faced with difficult decisions. And, when we are, it's important that we know what's expected of us – which is exactly where 'Doing the Right Thing, the Severn Trent Way' comes in.**

Doing the Right Thing is not just about obeying the law – it goes far beyond that. It's about following our five values and our key policies, which guide us towards doing the right thing all of the time. Acting in line with our values is key to ensuring we act as a responsible business and achieve our purpose and vision. Alongside our values and policies, this guide is designed to help all of us to do the right thing, especially at times when the answer might not be so clear. We'll never be able to predict every situation that you might find yourself in so we've also developed a really handy decision making tool – you'll find that here.

It can take real courage to do the right thing in every situation but, if we all live our values every single day and follow the guidance set out in 'Doing the Right Thing, the Severn Trent Way', we can be sure of achieving our vision to be the most trusted water company by 2020.

## OUR VALUES

We put our **customers first**

We are **passionate** about what we do

We act with **integrity**

We protect our **environment**

We are inspired to create an **awesome company**

# Who is this guide for?

## We should all...

- Make sure we're familiar with 'Doing the Right Thing The Severn Trent Way' and know where to find it.
- Make sure that we're following the law and our policies and that we're living our values every day.
- Feel confident to speak up if we think that something isn't quite right.
- Ask questions if there's something we're not sure about.

## Our people managers should...

- Know what's expected of their teams and be there to support them.
- Set a great example for their teams to follow.

## Our supply chain partners should...

- Be aware of the high standards that we've set for ourselves and expect from them in return.

## Our customers, investors and regulators can...

- Be confident that we're a company to be relied on to always do the right thing.



# How to do the right thing

## THINK

About our values before you act or decide – use our great decision making tool to help.

## REACH OUT

Ask others for guidance or read up on the problem.

## UNDERSTAND

All the potential consequences and who might be affected or involved.

## SPEAK UP

If you're worried or unsure about something.

## TAKE RESPONSIBILITY

So that our business can be trusted in your hands. Take it personally and make sure you know what 'Doing the Right Thing' is.

### I've got a concern... who can I talk to?

If you see or hear something that just doesn't feel right, it's really important to speak up. We understand that you might be worried about raising concerns, but you can be fully assured that you'll always be supported if you have a genuine issue to raise.

If you don't feel able to speak to the individual involved then you can also speak to...

- Your line manager
- A senior executive
- Your HR business partner
- Speak-Up – our confidential reporting line

We'll always look into your concerns and take action where we need to. All reports will stay completely confidential and we guarantee that anyone making a report in good faith will be protected.



# Doing the right thing

We have set out the principles that help us all to do the right thing to ensure we...

- Protect our customer and colleague data.
- Communicate in the right way.
- Stay free from bribery and corruption.
- Work fairly with competitors.
- Work fairly with our suppliers and partners.
- Protect our assets and information.
- Are environmental leaders.
- Respect each other and others' human rights.
- Make sure nobody gets hurt or made unwell by what we do.

*“We stick to our values wherever we operate in the world, and never risk our reputation”*

# We put our customers first

Wherever they are and whatever they're doing, we think about what matters to our customers and we make sure we're there for them.



## WE PUT OUR CUSTOMERS FIRST

# The right way to... protect our customer and colleague data

Our customers will deal with us in lots of different ways. They might email us, or write to us, give us a call or get in touch with us via social media or web chat. Over the course of time, we'll collect lots of data and information about them and, however they choose to share it, our customers trust us to keep it safe.

We also collect a lot of information about our colleagues and they trust us to protect that data in exactly the same way as we would for our customers.

## So what does this mean for me?

### We should never...

- Share customer or colleague data with other people or companies – unless the customer or colleague has given us permission to do so.
- Use colleague or customer information for our own personal benefit.
- Let any of our third party suppliers access our customer or colleague data on our behalf, without checking with Group Security and Group Commercial first.
- Give anyone who hasn't had the right training access to customer or colleague data – which should be securely stored at all times.
- Ignore it if we believe that any customer or colleague data has been misused or lost. We should contact our line manager, a senior executive or use the confidential Speak-Up helpline immediately.

## Questions and answers

### Q. What is customer data?

A. Any data relating to customers or their activities in Severn Trent. This could include things like names, addresses, transaction and banking data.

### Q. Can I access our payroll system for colleague info?

A. No, you're not allowed to access payroll data unless you're authorised to do so and it relates to a work matter, such as making changes to their salary.

### Q. I've got an idea for a marketing campaign. Can I contact customers who have already provided their details?

A. No – we can only use customer data for the reason it was provided.

## How does it make you feel?

“Our supplier asked for some of our customer data for their marketing campaign. They've always been good to us so I couldn't see the harm. Our customers will never know.” ❌

“I left my laptop on the train and I know it's got colleague data on it. I reported it immediately and the Security team have managed to secure the information.” ✅



Further information  
Please refer to our **Customer Policy**  
and our **Data Protection Policy**.

# We are passionate about what we do

We have loads of different skills, abilities and talents in our business. We're united and fired up about what we do – so that we truly leave a lasting legacy.



## WE ARE PASSIONATE ABOUT WHAT WE DO

# The right way to... communicate

We know that an important part of being the most trusted water company is being there for our customers, communities, investors, regulators and colleagues – whenever and however they need us. Social media is a brilliant way for us to do that, but only if we use it properly.

Whether we're commenting on behalf of Severn Trent or using our own personal accounts, we should always remember that we're personally responsible for our posts and act in a way that protects or enhances Severn Trent's reputation and brand. So what does this mean for me?

We should always...

### Questions and answers

**Q. I've seen an example of a colleague making inappropriate statements on social media, what should I do?**

**A. Check what you've seen against the social media guidelines. Just like the 'real' world, comments made in the virtual**

**world should reflect our values. If you're concerned, please speak to your line manager.**

**Q. I see lots of interesting articles about Severn Trent in the media, is it ok to post links to them from my personal account?**

**A. Yes, but think about what you're posting. You should only share something that's intended for the general public.**

**Q. The local newspaper has just tweeted me, asking me a question about Severn Trent, is it ok to answer?**

**A. No, you should direct them straight to our Communications team.**

## How does it make you feel?

*“I've had the worst day at work. I can't wait to tell all of my friends about it on Facebook.”*



*“The BBC have tweeted me about the road works in Leicester. I passed them straight on to the Press Office to deal with.”*



**Social Media Policy**

# We act with integrity

There is an authenticity,  
fairness and honesty about us.



## WE ACT WITH INTEGRITY

# The right way to... stay free from bribery and corruption

Being trusted means always doing the right thing for our customers, communities, investors, regulators and colleagues. This means that we will never tolerate fraud, bribery or corruption – and that we only ever work with suppliers and partners who care about this as much as we do.

We don't have an affiliation with any particular political party and we avoid potential conflicts of interest by making sure that we tell each other about them upfront and manage them in the right way.

### So what does this mean for me?

#### We should always...

- Speak up if we suspect fraudulent activity. Talk to your line manager, a senior executive, or use the confidential Speak-Up helpline.
- Make sure that we meet our five 'gifts and entertainment' criteria before giving or receiving gifts or hospitality and record this on the Gifts and Hospitality Register. Check out our handy decision tree to find out more.
- Refuse and never offer any gifts or hospitality that could be considered a bribe.
- Consult our General Counsel team before giving any gift to a public official.
- Work with our Group Commercial team when bringing new suppliers on board – they'll help us to make sure that they meet our high ethical standards.
- Disclose and record any personal, social or financial interests that might be a conflict of interest to our work at Severn Trent in the right way.
- Take part in any political activity in our own time and never let it influence our behaviour or our work.

### Questions and answers

**Q. A colleague was travelling for work recently and took some friends out for dinner and submitted the meal for reimbursement as an expense. Is this acceptable?**

**A. No, by submitting these expenses she is committing fraud. Expenses should reflect what charges you've had while working.**

**Q. My colleague has boasted that her suppliers know they 'must look after her' if they want to keep working for Severn Trent, is that right?**

**A. No, it is a breach of our Gifts and Hospitality policy to solicit entertainment or other benefits in return for working with a supplier.**

**Q. I won a raffle held by my supplier last week and my prize was a new camera. Can I accept it?**

**A. The prize is deemed a gift and you should make sure you've checked our Gifts and Hospitality policy and spoken before accepting it.**

## How does it make you feel?

“A supplier who wants to work with us has offered to let my wife and I use his holiday home for a weekend. I don't see the harm in it – we'd love a holiday.” ❌

“I've been offered a box at a Coventry City home game. Our supplier will be there and we'll spend an hour beforehand in a business meeting. I've entered all of the details into the Gifts and Hospitality register and made sure it fits with our policy.” ✅



Further information  
Please refer to our  
**Group Commercial Policy,**  
**Group Financial Crime Policy** and  
**Group Speak-Up Policy.**

## WE ACT WITH INTEGRITY

# The right way to... work fairly with our competitors

To be the most trusted water company by 2020, we know that it isn't enough to simply comply with competition and antitrust laws, although of course it's really important that we do.

We also need to make sure that we're always honest and straightforward in the way that we do business and that the way we compete is open and fair.

This includes the way that we gather our competitive information – which we should only ever get through publicly available sources such as the internet or newspapers. We should never use deceit and bribery, or use a competitor's confidential information without their permission.

### So what does this mean for me?

Every time we deal with others, we're open to scrutiny, but by following a few simple guidelines, we can be sure that we're doing things the right way.

#### We should never...

- Take part in anti-competitive behaviour with our competitors – such as fixing prices or swapping commercially sensitive information.
- Ask our colleagues to share confidential information from their previous employers.
- Make exclusive arrangements, including contracts that mean our suppliers can only work with us.
- Make falsely critical comments about our competitors.
- Use privileged information or misrepresent the facts to take unfair advantage of someone.
- Misuse third parties' trade secrets, intellectual property or confidential information.

### Questions and answers

**Q. I've been asked to attend an industry meeting, is it ok to participate?**

**A. Yes but remember, normal competition rules apply. Make sure you don't discuss or disclose commercially sensitive information with a competitor.**

**Q. Can I invite more than one supplier to a meeting?**

**A. From time to time this may be sensible. However, these meetings can be sensitive because they often involve suppliers who are competitors. Make sure that no inappropriate activity takes place during these meetings.**

**Q. Can I ask my supplier a question about a competitors future prices?**

**A. No, we should not have advance warning of a competitors future prices. If anyone ever gives you this information, contact our General Counsel team.**

## How does it make you feel?

*“I don't want someone else using the same brilliant software we're using, so I've made sure our suppliers can't work with any of our competitors.”*



*“Our supplier has been asking me about what their competitors do... I don't feel comfortable sharing their confidential information though so I haven't said anything.”*



Further information  
Please refer to our **Group Competition and Competitive Information Policy** and **Group Commercial Policy**.

## WE ACT WITH INTEGRITY

# The right way to... work fairly with our suppliers and partners

We work with a fantastic group of suppliers and partners and our great relationship with them is something that we really value. We depend on their skills and expertise to help us deliver a brilliant experience for our customers, so it's really important that we work with them in the right way.

### So what does this mean for me?

#### We should always...

- Be open, accurate and honest in all of our communications with suppliers and partners.
- Make sure we work with our colleagues in Group Commercial to select our suppliers in the right way.
- Help our suppliers and partners to understand the high standards that we set ourselves by making sure that they're familiar with 'doing things the right way'.

### Questions and answers

**Q. Our competitors are cheaper than us, what can I do about that?**

**A. We should always negotiate with suppliers to get the best deal that we can for Severn Trent and our customers – but we must take care not to put them under duress when negotiating with them.**

**Q. I've got a project that I need to get off the ground quickly and I've got a supplier in mind – can I bypass the procurement process?**

**A. No, you must speak to our Group Commercial colleagues – they'll be able to support you in buying the right way and making efficiencies for the company.**

**Q. I've got concerns about the behaviour of one of our suppliers, what can I do?**

**A. If you have any concerns about our suppliers not working to our values, contact Group Commercial immediately.**

## How does it make you feel?

*“I needed something doing quickly so I didn't worry about going through Group Commercial. I just got the supplier in, it was only a small job, what's the worst that can happen?”*



*“I've worked with Group Commercial all the way through the procurement process and now I'm confident we've got the right people on board and for the right price.”*



Further information  
Please refer to our **Group Commercial Policy**.

## WE ACT WITH INTEGRITY

# The right way to... protect our assets and information

We all know how important it is to keep our customers' information secure – but it's just as important that we protect our own, and that we keep our assets safe too.

We should always keep our confidential information to ourselves and do everything that we can to protect our assets, such as our buildings and equipment, from loss, damage or theft.

### So what does this mean for me?

#### We should always...

- Check with our Group Commercial colleagues that there's an appropriate agreement in place before sharing our confidential information with third parties such as suppliers and customers.
- Keep all of our documents and devices, such as laptops and mobile phones, protected and secure.
- Use our assets, such as buildings and vehicles, for business reasons only – unless we've got permission for other use. We should look after them with care and protect them from theft and damage.

### Questions and answers

**Q. I need to share some of our colleague data with a third party, what should I do?**

**A. You must speak to Group Commercial first – they'll help you set up the right agreements to keep us and our data protected.**

**Q. My brother-in-law is staying the night and has asked if he can use my company laptop to access the internet. Is this ok?**

**A. Our computers should only be used for the purpose of conducting business. We should always keep use limited to ourselves and do everything we can to protect our assets and keep our information safe.**

**Q. I've lost my company mobile phone, what should I do?**

**A. Contact the Security team as soon as possible, so that they can secure the information on it.**

## How does it make you feel?

“*I only left my van for a second, how was I to know someone would spot the mobile on the dashboard so quickly?*”



“*Our supplier needs our colleague data to provide the correct service, so I've worked with Group Commercial to put the right non disclosure agreement in place.*”



Further information  
Please refer to our **Data Protection Policy, Group Commercial Policy, Information Management Policy** and **Security Policy**.

# We protect our environment

We're always aiming for the cleanest water and doing more of what we do through renewable energy.



## WE PROTECT OUR ENVIRONMENT

# The right way to... be environmental leaders

To really achieve our purpose, of serving our communities and building a lasting water legacy, we all need to be committed to environmental leadership – which means making a positive contribution to the future and fully embracing sustainability.

Our customers and stakeholders really value healthy rivers and we're always looking at new ways to reduce the impact that our work has on the environment. We're working hard to become a carbon neutral company and have ambitious plans to generate 50% of our energy from renewable sources by 2020, whilst all the time making sure that our customers continue to enjoy the best value service.

### So what does this mean for me?

#### We should always...

- Be looking to reduce our energy consumption and use of fossil fuels.
- Look to minimise our environmental impact and prevent pollution.
- Love our network and encourage our customers and communities to do the same, promoting water as a vital resource.
- Encourage biodiversity across our sites.
- Lead the debate, by working with our regulators and other stakeholders to deliver a sustainable water industry.
- Make sure that our supply chain partners work to the same high standards as we do.

### Questions and answers

**Q. I work in an office, how can I help us to protect the environment?**

**A. For a start, you can make sure you turn all of your equipment off when it's not in use and check for faulty equipment that might be using more energy than needed – little things make a huge difference!**

**Q. I don't work in a customer facing team, how can I help to educate our customers?**

**A. Remember, most of us are customers too – why not talk to your neighbours, friends and family about how they can all play their part?**

**Q. I've got concerns about our suppliers – I don't think they follow the same high standards as us, who should I tell?**

**A. Speak to our colleagues in Group Commercial immediately.**

## How does it make you feel?

*“Turning off my computer won't make any real difference to our energy use, so I don't bother.”* ❌

*“My neighbour keeps getting blockages so I've told them all about what they should and shouldn't put down the drain – it's really helped them out.”* ✅



Further information  
Please refer to our **Group Environment Policy**.

# We are inspired to create an awesome company

Every day there is an opportunity for us to learn, develop, create and deliver, together.



## WE ARE INSPIRED TO CREATE AN AWESOME COMPANY

# The right way to... respect each other and others' human rights

We know that Severn Trent just wouldn't be the great company that it is without the hard work and dedication of our fantastic colleagues and the diverse range of talent, skills and experience that they have to offer.

To be the most trusted water company by 2020, we need the very best people on board and we'll give everyone an equal chance to succeed based on their hard work, talent and commitment.

Each and every one of us deserves an opportunity to shine and we can only do that when we treat each other with respect, in an environment free from harassment and discrimination.

We'll also protect the human rights of all of our colleagues. As an international employer and purchaser of goods and services, we know we have a really important role to play.

### So what does this mean for me?

#### We should always...

- Treat each other fairly, honestly and courteously.
- Value diversity and promote equal opportunities for all of our colleagues.
- Recruit, reward and develop our colleagues based on merit.
- Keep our workplaces safe and non-threatening and never tolerate bullying, harassment or disrespectful behaviour of any kind.
- Speak up if we see bullying, harassment or unlawful discrimination in the workplace. You can speak to your line manager, a senior executive or Speak-Up.
- Speak up if we ever suspect any human rights violations at Severn Trent, or within our supply chain – such as child or forced labour or physical punishment and abuse.
- Comply with all aspects of the Modern Slavery Act 2015 and ensure that slavery and human trafficking is not taking place in any part of our business or supply chain.

### Questions and answers

**Q. I'm a manager and need to make a promotion decision between two candidates. Is it ok to go with the younger person as I'm likely to get more years out of them?**

**A. No.** We only ever make employment related decisions based on merit – never on age or any other characteristics.

**Q. A friend sent me an email with some rude jokes that I think are funny. Can I forward them to some of my colleagues?**

**A. No,** we treat all colleagues with dignity and respect and what you consider funny, others might consider offensive.

**Q. If we discover an abuse of human rights, what should I do?**

**A. You should speak to your line manager or a senior executive immediately.** If you don't feel comfortable doing that then you should contact Speak-Up.

**Q. My colleague has recently become engaged to their same sex partner and I've overheard another colleague say "How does that work then, who's the man? What a waste", should I say something?**

**A. Yes,** we value diversity and treat all colleagues with dignity and respect, so it's important to speak up and challenge these types of conversations, if you don't feel confident in challenging speak to our LGBT+ network for advice and/or your manager.

## How does it make you feel?

“I interviewed a couple of people today for a job. I went for the male candidate as he's less likely to go off on maternity leave.” ❌

“One of our colleagues was feeling bullied at work, they didn't feel able to talk to their manager so I told them all about Speak-Up. They're much happier now they can report it in confidence.” ✅



Further information  
Please refer to our **Group Human Resources Policy**.

## WE ARE INSPIRED TO CREATE AN AWESOME COMPANY

# The right way to... make sure nobody gets hurt or made unwell by what we do

Our brilliant people are vital to our success and we care about each and every one of them. Nobody should ever get hurt or be made unwell by what we do, and that includes our supply chain partners, customers and the communities in which we work.

Health, safety and wellbeing is at the heart of everything we do and it's really important that our customers, communities, investors, regulators and colleagues can trust us to do everything we can to perform at our very best in this area.

We're proud of our Occupational Health programme, which is dedicated to the physical, social and mental wellbeing of our colleagues and we'll always make sure that our workplaces are safe, enjoyable places to be.

### So what does this mean for me?

#### We should always...

- Make the safety of ourselves and our colleagues, supply chain partners, customers, and communities a top priority.
- Set the very best example in regards to health and safety and recognise others who do the same.
- Speak up if we see, or are asked to do, anything that we think is unsafe.
- Report any health, safety or wellbeing instances honestly and make sure that we learn from them.
- Work with our supply chain partners to make sure that they share our high standard.

### Questions and answers

**Q. I'm worried about the safety of a new piece of equipment, what should I do?**

**A. If no instructions or training have been provided, it should not be used. If there are instructions and you're still concerned, contact the Health, Safety and Wellbeing team.**

**Q. How can I report a safety concern confidentially?**

**A. In the first instance, talk to your line manager. You can also speak to a senior executive or contact Speak-Up.**

**Q. Who are our Health and Safety representatives?**

**A. You'll find a full list on our Streamline page.**

## How does it make you feel?

“*I know what I'm supposed to do, but really it's about common sense, sometimes it's just quicker not to worry too much about Health and Safety.*”



“*I was asked to do something that I thought looked unsafe. I challenged it and now the process has been changed and we're all getting training.*”



**Group Health, Wellbeing & Safety Policy**

# Doing the right thing

We have a suite of policies to help guide us all in knowing what the right thing to do is. These can be found on Streamline.



*Which way?  
The right way,  
the Severn Trent Way.*

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Severn Trent Plc  
Severn Trent Centre  
2 St John's Street  
Coventry CV1 2LZ

[stwater.co.uk](http://stwater.co.uk)

