



DOING THE RIGHT THING

GROUP COMPETITION AND COMPETITIVE INFORMATION POLICY

Conducting business the right way
Competing openly, honestly and fairly

Date issued: January 2023

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SEVERN
TRENT

CONDUCTING BUSINESS THE RIGHT WAY

Doing the Right Thing helps us understand how we can put our core values into practice every day. It's for all of us and represents our minimum standards and expectations.

By Doing the Right Thing every day, we can protect our reputation, our people, and all of those who work with us to help deliver on our commitments to:

- Build public trust
- Live our values every day
- Comply with laws, regulation and our standards
- Not tolerate illegal or unethical acts
- Treat everyone fairly (including our people, customers and suppliers)
- Be a responsible and sustainable company
- Create an inclusive environment
- Give our people confidence to Speak Up if they see things that are not quite right.

Our Group Policies support Doing the Right Thing and can be found [HERE](#).



INTRODUCTION

There's always an element of competition in business, but we make sure we're always honest and straight forward, and compete openly and fairly.

We recognise the positive impact competition has on our business and customers, but we also recognise the importance of upholding fair play in business. Competition law is designed to create a level playing field in business and can apply to all sorts of circumstances, such as discussing confidential information, price fixing or co-ordinating strategies with competitors, to agreeing not to compete.

Competition law applies to all parts of our company, and we take our position within the market and our compliance with competition and antitrust laws, seriously.

For us though, it is not enough just to comply with the law. In everything we do, we strive to do it with openness, fairness and honesty, which is supported by our Values and the stringent rules we have in place.

Scope

Our Group Competition and Competitive Information Policy applies to you if you are employed by, or carry out work on behalf of Severn Trent Plc and extends to any Severn Trent group company, employees, contractors, temporary staff and agency workers.



OUR POLICY

We will:

- Comply with all competition law requirements in England and Wales.
- Operate in a way that guards against unfair business practice which extends to making sure business is not subsidised for another group company.
- Be open about our relationship with suppliers and business partners. Whilst we cannot disclose commercially sensitive information, we will make sure the selection process is transparent all the way through.
- Ensure that we operate as efficiently as possible whilst protecting long term value through obtaining the lowest sustainable cost possible.
- Maintain high ethical standards of business conduct and ensure our suppliers share our same values.
- Encourage our supply chain to think about bettering their approach, as we constantly do with ours, ranging from environmental to social sustainability.
- Make sure we act fairly and don't place anyone at an unfair commercial advantage or disadvantage.
- Keep records to explain why we took the decisions we've made.
- Write clearly and concisely – careless communications in business can be very damaging.
- Ensure we don't unnecessarily talk with competitors about prices, costs, terms of business or other commercially confidential information.
- Only gather competitive information through legitimate channels such as that which is publicly available and will never use deceit or bribery or misuse a competitor's confidential information.

Remember:

Breach of competition legislation can expose Severn Trent to the risk of substantial fines of up to 10% of worldwide group turnover, civil claims, reputational damage, imprisonment of employees and directors' disqualification;

Breach of this policy may lead to disciplinary actions being taken against you;

Please refer to the Group Procurement Policy for more information.



OUR RESPONSIBILITIES



Our employees' responsibility

We are all responsible for making sure we're not being anti-competitive. You need to consider and implement the commitments made in our Group Competition and Competitive Information Policy when performing your work activities and when making decisions.

Our leaders

Leaders are responsible for making proper arrangements within their business areas to ensure compliance with this Group Competition and Competitive Information Policy.

STEC

The Severn Trent Executive Committee of the Severn Trent Plc Board provides regular oversight of this policy.

REPORTING CONCERNS

Information about this policy and relevant guidelines are communicated through our internal communication channels.

I HAVE A CONCERN

If you have a **concern** about any issues relating to this policy or relating to anti-competitive behaviour you should report this through your line manager. Alternatively, **concerns may be raised** with any of the following group senior executives: the CEO, the Group Commercial Director, the HR Director or General Counsel or through our confidential and independent whistleblowing helpline. Please refer to our **'Speak Up'** policy.

SEVERN TRENT'S COMMITMENT

We are **committed** to ensuring that we **act with integrity** and that we are straightforward, honest and **compete openly and fairly**. We will deliver training and development to our people to ensure they understand the high standards they are expected to work to. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

I HAVE A QUESTION

If you have a **question** about this policy or any anti-competitive issue, you can contact the Head of Legal or the Company Secretary.



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