

DOING THE RIGHT THING

GROUP SPEAK-UP POLICY

Standing up for
what's right

Date issued: January 2023

WONDERFUL ON TAP

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

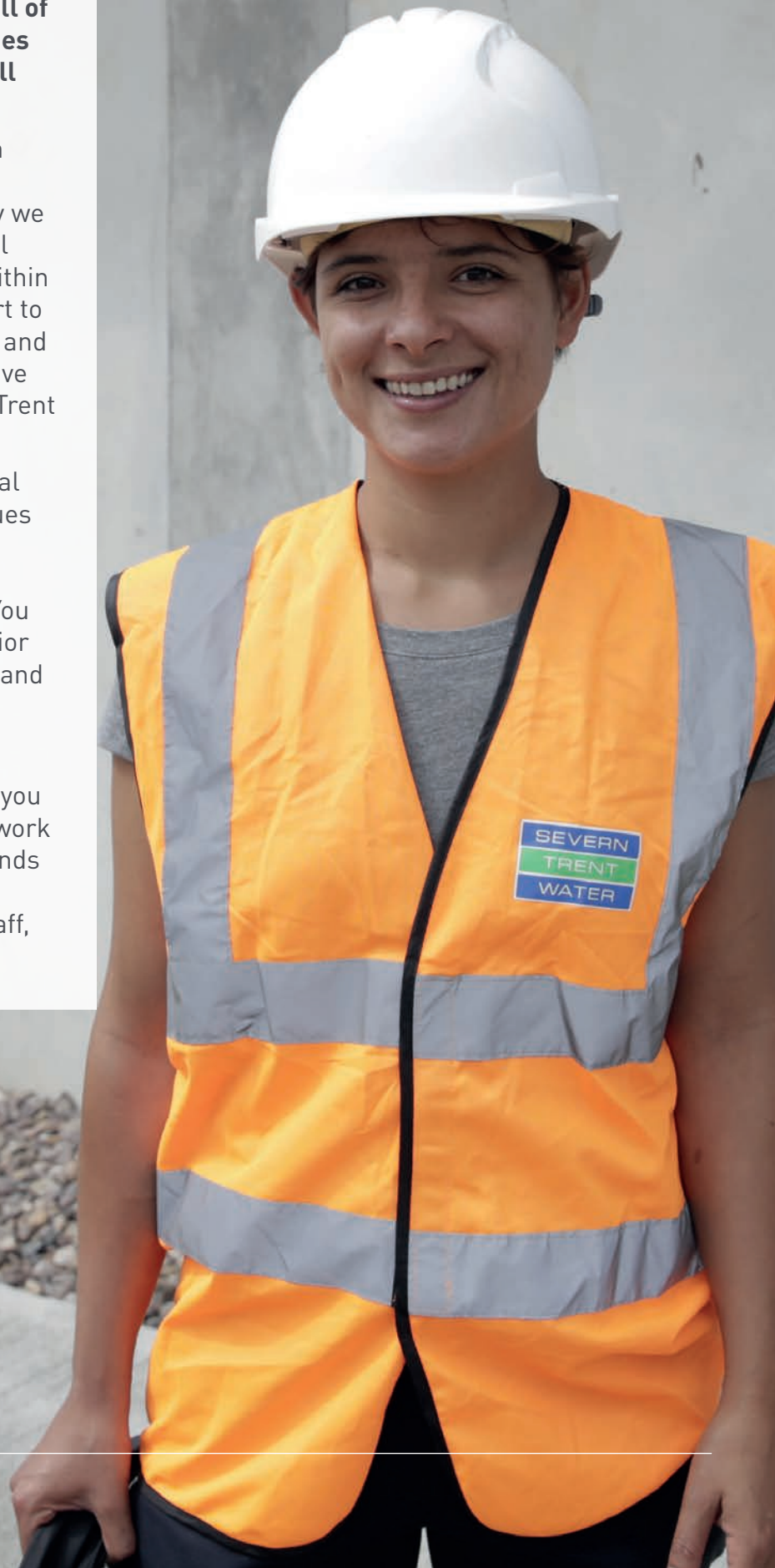
We aim to do things in the right way all of the time, and encourage our colleagues to speak up to make sure we never fall below this standard

We truly believe that our Values are an essential and vital part of the life and culture of our company, and that's why we take seriously any reports about illegal practices or inappropriate conducts within our company. We all must play our part to achieve the highest standards of legal and ethical behaviour. We must always strive to do things the right way, the Severn Trent way.

We hold ourselves to the highest ethical standards and encourage our colleagues to Speak-Up if they are worried about wrong doing affecting our company, customers, colleagues, or suppliers. You can speak to your line manager, a senior executive, HR, or, use the confidential and independent helpline 'Safecall'.

Scope

Our Group Speak-Up Policy applies to you if you are employed by, or carries out work on behalf of Severn Trent Plc and extends to any Severn Trent group company, employees, contractors, temporary staff, agency workers and volunteers.



OUR POLICY

Speak Up

It is our policy to have the highest ethical standards

So if you come across what you see as possibly unlawful or unethical conduct, financial wrong doing, or dangers to health and safety or the environment then please do tell us. Examples are:

- Breaches of Doing the Right Thing or any of our Policies
- Fraud / theft
- Corruption, bribery or blackmail
- Criminal offences
- Negligence / intentional disregard of duties and responsibilities
- Conduct likely to damage the company's reputation
- Failure to comply with a legal or regulatory obligation
- Endangering the health and safety of any individual
- Endangering the environment
- Improper use of authority
- Providing data which is known to be inaccurate or misleading
- Hiding information about wrong doing
- Instances of slavery and human trafficking in breach of our Anti-Slavery and Human Trafficking Standard

Our Commitments

We will:

- Take all genuine concerns raised seriously and investigate
- Ask questions about your concern so that we have enough information to help with our investigation.
- Respect your right to remain anonymous and take reasonable measures to keep your identity confidential. We sometimes may have a legal obligation to disclose your identity, or, others may guess your identity
- Treat your concern with the upmost confidentiality
- Promise that if you raise a concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result (even if you were mistaken)



OUR POLICY [CONT.]

How to Speak Up

The most important thing is that you raise your concern with someone. There are a number of ways you can raise a concern and these are listed below:

Option 1 – Line Manager

- If you have a concern we hope that you will feel able to raise it first with your Line Manager. You can do this face to face or in writing
- In most cases, your Line Manager will be the most appropriate person to talk to about your concern. However, if you can't raise the issue with your manager, or no action has resulted from you doing this, talk to your manager's manager

Option 2 – Senior Executives

- Alternatively, you can raise your concern with any member of our Severn Trent Executive Committee, including the following senior executives:
 - Chief Executive
 - Human Resources Director
 - General Counsel

Option 3 – Human Resources

- You can raise your concern with any member of the Human Resources team

Option 4 – Safecall

- If you would feel more comfortable speaking to someone in confidence and independent of our company, then you can call our confidential reporting line on: **0800 915 1571**
- This confidential reporting line is operated by Safecall - an independent company that specialises in handling concerns at work. Safecall will take details of your concern and send a report through to Severn Trent to investigate. You can ask Safecall to keep your identity confidential. A description of how Safecall will handle your call is set out in our Whistleblowing Policy



Further Information:

- Please refer to the **Whistleblowing Policy** and the **Group Human Resources Policy** for further information
- Please refer to the **HR Hub** if you have any questions or for further information

OUR POLICY [CONT.]

Responsibilities

As an Employee you are responsible for:

- Understanding the standards of ethical behaviour expected at Severn Trent, as outlined in “Doing the right thing”
- Raising any genuine concern you may have as quickly as possible using one of the methods listed in the ‘How to Speak Up’ section

Managers and Directors are responsible for:

- Ensuring that all employees, agency workers, temporary staff, volunteers and contractors working in their department are made aware of this policy and “Doing the right thing”
- Creating an environment in which it is easy to discuss a concern about unethical behaviour
- Taking seriously any concern that is raised
- Dealing sensitively with anyone who raises a concern
- Logging all concerns raised with Human Resources
- Notifying Human Resources or Internal Audit at the earliest opportunity if the concern involves possible fraudulent activity. This will enable them to assess whether the matter is serious enough to warrant an investigation under the Anti Bribery & Anti Fraud Response Plan
- Investigating concerns thoroughly and making an objective assessment of the concern (where the matter is not handled under the Anti Bribery and Anti Fraud Response Plan)
- Seeking advice when necessary
- Keeping the employee advised of progress, as appropriate
- Completing an Investigation Summary Report



OUR RESPONSIBILITIES

Our employees' responsibility

We are all responsible for making sure our Values are lived up to and not to tolerate poor ethical standards. You need to consider the commitments made in our Group Speak Up Policy when performing your work activities and when making decisions.

Our leaders

Business leaders are responsible for making proper arrangements within their business areas to ensure compliance with this Group Speak Up 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 unethical or unlawful behaviour you should report this through your line manager. Alternatively, concerns may be raised with any member of our Severn Trent Executive Committee including the CEO, HR Director, General Counsel, or through our confidential and independent whistleblowing helplines. Please refer to our Whistleblowing Policy.

SEVERN TRENT'S COMMITMENT

We act with integrity and strive to always **do the right thing**. 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 ethical or legal issue, you can contact the Head of Legal or the Company Secretary.



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