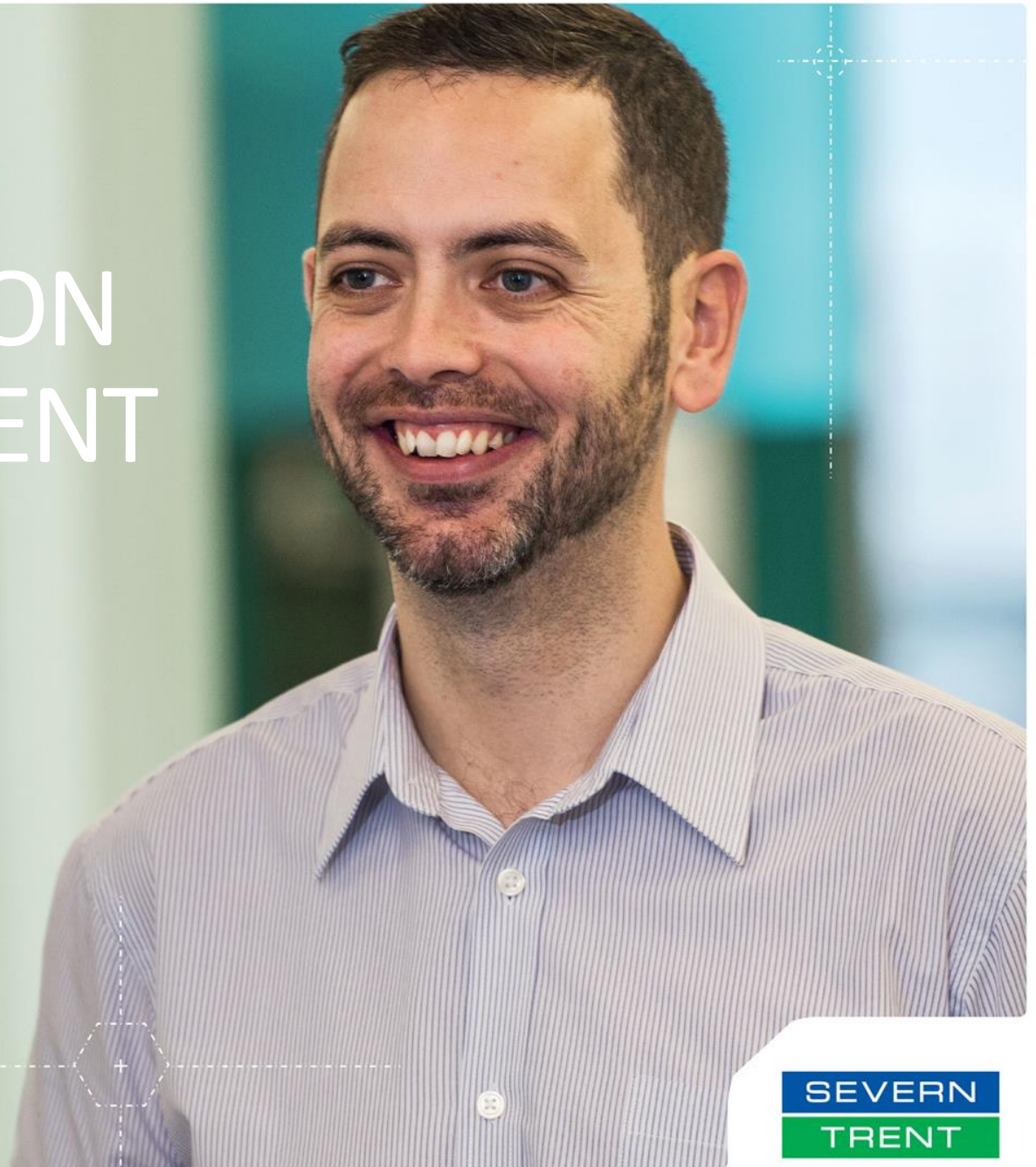


GROUP INFORMATION MANAGEMENT POLICY

**Conducting business
the right way**

Securing our information

Version 2 [May 2018]



CONDUCTING BUSINESS THE RIGHT WAY

Our Values, Doing the Right Thing and Group Policies

Our purpose is to serve our communities and build a lasting water legacy. Our vision is to be the most trusted water company. Our Values, our Doing the Right Thing code and our Group Policies are the foundation for how we operate to achieve our purpose and to become the most trusted water company. They help us to make the right decisions, and provide guidance where needed.

Acting with Integrity is one of our Core Values, and we must never compromise it.

Your Commitment to this Policy

- To conduct yourself with Integrity and comply with the law
- Recognise that your decisions have an impact on others - have high standards
- Unequivocally expect responsible and ethical decisions from others
- Speak up if you observe behaviours that are not consistent with our Values
- Tirelessly adhere to our Value of Acting with Integrity

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**

INTRODUCTION

Serving our customers by working smarter and securing information

Managing information is key to achieving our business success. The information we use, in the form of emails, databases, electronic or paper records, represents our “corporate memory” and is a vital asset for our ongoing operations providing valuable evidence of business activities and transactions.

We recognise that information has a lifecycle which needs to be managed to ensure that the right information, is with the right person, at the right time. It’s key to our service delivery, our decision making, our accountability and having access to all our information now and in the future. It’s also key to protecting our customer’s information.

Scope

Our Group Information Management 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.

POLICY

We will:

- Actively manage information through to its destruction by:
 - only retaining information that is necessary for legitimate business purposes;
 - Securely retaining records and documents, whilst also ensuring information that is no longer needed is disposed of in accordance with the Data classification standard and Data retention & disposal standard;
- Keep personal data safe and secure to make sure that no one can get unauthorised access to it, change, destroy or lose it;
- Manage information effectively, whether it is electronic or paper form, to meet our company needs;
- Understand requirements to maintain the high quality of information;
- Constantly practice good housekeeping and review the information we hold;
- Make sure we understand the rules that apply to what we are doing and that appropriate contractual and security safeguards are in place;
- Please refer to the **Group Data Protection Policy**, **Group Security Policy**, and the **Data Breach Standard** for further information

Key areas:

We have systems and processes in places which focus on 5 key areas:

Information Privacy

- We will seek to ensure personal data is adequately protected

Information Retention & Disposal

- We will adequately protect and maintain the necessary records and documents whilst ensuring that records no longer needed, or deemed to have no further value, are discarded at the appropriate time according to the retention and disposal schedules;

Information Quality

- We will maintain data to high standards of information quality at all times;

Information Classification

- We will use the classification system for documents to identify and safeguard information confidentiality, integrity and availability;

Information Security

- We are committed to minimising the risk of misuse of information by assuring its confidentiality, integrity and availability.

OUR RESPONSIBILITIES



DOING THE RIGHT THING

Your Responsibility

We are all responsible for doing everything we can to protect our data and information. You need to consider and implement the commitments made in our Group Information Management Policy when performing your work activities and when making decisions.

Leaders

Leaders are responsible for making proper arrangements within their business areas to ensure compliance with this Group Information Management 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 the management or security of our information you should report this through your line manager. Alternatively, concerns may be raised with any of the following group senior executives: the CEO, Chief Data Officer 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 we always protect our assets and information. 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 you can contact the Chief Data Officer on dataprotection@severntrent.co.uk