

# GROUP SPEAK-UP POLICY

**Conducting business  
the right way**

Standing up for what's right

Version 1 [August 2016]

# 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

**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, or, use the confidential and independent helpline 'Safecall'.

## Scope

Our Group Speak-Up 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

## 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.
- We will ask questions about your concern so that we have enough information to help with our investigation.
- We will 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).

# Policy

## How to Speak Up

### 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 one of the following senior executives:
  - Chief Executive
  - Human Resources Director
  - General Counsel and Company Secretary
  - Managing Director, Business Services (STS only)

### Option 3 – 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 RESPONSIBILITIES



## DOING THE RIGHT THING

### Your 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.

### Leaders

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 of the following group senior executives: the CEO, HR Director, the General Counsel and Company Secretary and / or the Managing Director, Business Services, or through our confidential and independent whistleblowing helpline. 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 Deputy Company Secretary.