



SGN
Your gas. Our network.



Doing the right thing

SGN Code of Conduct

OPEN →



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Welcome

Introduction from Mark Wild, CEO

Our purpose, vision and values

Our Code

Our responsibilities

Our decisions

Our commitment





Introduction from Mark Wild, CEO

I'd like to welcome you to our Code of Conduct ("Code"). This wide-ranging document clearly and openly sets out the rules around behaviour and professional conduct we expect from all our employees right across our business. This applies equally, whether you're new to our company or have given many years of service.

You may wonder why we have a Code. Well, it not only serves as a set of internal guidelines for colleagues to follow, but for anyone looking at us from the outside, or wanting to do business with us, it provides them with a strong statement of our corporate values and commitments.

Ultimately, it's about all of us ***doing the right thing*** and the belief we'll all adhere to this principle is what brings us together as colleagues. So, with that in mind, please consider it an integral part of your professional commitment to read our Code and understand why we have it.

It will provide you the tools you'll need to apply our values in your day-to-day working life. Remember also to speak up if you suspect anything is in breach of our Code (or our policies or the law), and please do ask questions if something isn't clear.

Agreeing to abide by our Code and speaking up when necessary is essential to your commitment to SGN. Considering the essential public service we provide and all the personal lives we impact, requesting and receiving the highest ethical behaviour from all of us, is clearly the right thing to do.

Mark Wild

Chief Executive Officer





OUR PURPOSE

Serving our communities by
keeping everyone safe and warm

OUR VISION

To give our customers the
best clean energy experience





Our Code

Our values and behaviours

Our company reputation is built on the values and behaviours we all display. Our Code underpins our company values and provides a framework, setting out how we are expected to behave and helping us do the right thing. Knowing, understanding and adhering to the Code is integral to how we do business.

It contains guidance sections which highlight key principles, responsibilities and ethical dilemmas. It doesn't cover every scenario you might encounter, but it does point you in the right direction and to other resources for help. Look out for links to our policies and ways to connect with managers and other useful contacts when you may need additional support.

Who does the Code apply to?

It applies to all SGN colleagues (meaning permanent, fixed-term and temporary employees, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with us). We ask and expect all our colleagues to meet the expectations set out in this document, to maintain and foster a positive culture by **doing the right thing**, and to speak up when something doesn't seem right.

We also expect our partners and other third parties to follow our Supplier Code and share our commitment of **doing the right thing**.

Non-compliance

A deliberate breach of the policies and procedures that underpin this Code will, of course, be taken seriously and for our own employees could lead to action being taken in-line with our Disciplinary Procedure.

Please also be aware, breaking the law is even more serious and could lead to civil or criminal proceedings for any person or organisation involved.





Our responsibilities

Doing the right thing comes with a high level of responsibility, not only for us all to do what's expected, but also to go above and beyond expectations.

As a company, we're committed to:

- > Supporting our people in making the correct ethical decisions
- > Ensuring everyone feels able to speak up if they've concerns or ideas to share
- > Investigating facts thoroughly, fairly and promptly, when concerns are raised in good faith
- > Taking action if anyone who's raised a concern is being treated unfairly because of it
- > Protecting our people against malicious allegations by taking appropriate action if necessary
- > Ensuring there's appropriate training and resources to enable people to understand the compliance obligations applicable to their jobs



We are only as good as our people, and therefore our reputation depends on the reputation of the individuals who work for the company. Our screening process is rigorous and includes background checks so that we have the best information possible about our prospective employees. We expect you to continue to adhere to principles of integrity, honesty and transparency. If at any time, while you are associated with the company, you are convicted of or charged with any criminal offence (including for driving) that impacts your ability to undertake your duties lawfully or practically or impacts your work relationships, we ask you to report this information to the HR department so that can be appropriately documented internally.

As an employee, please do share in our commitments to:



Comply – Follow the laws and company requirements applicable to your job and seek advice if you're not sure. Complete all training assigned to you.



Speak up – If you've any concerns about unethical or illegal activity, or suspect non-compliance with our Code, policies or the law, then do **speak up**.



Do the right thing – If you're unsure what to do, check the Code to see if our values align with your actions.

As a manager, please be sure to:



Lead by example – Through your actions, show your team what **doing the right thing** looks like by following the law, our Code and our policies without exception.



Provide direction – Your team members look to you as a model of how to act. Follow the Code and our policies carefully and understand them well so you can guide others.



Provide support – Your team needs to know you're there for them when they have concerns and ideas to share. Make sure they feel safe and confident when speaking up.

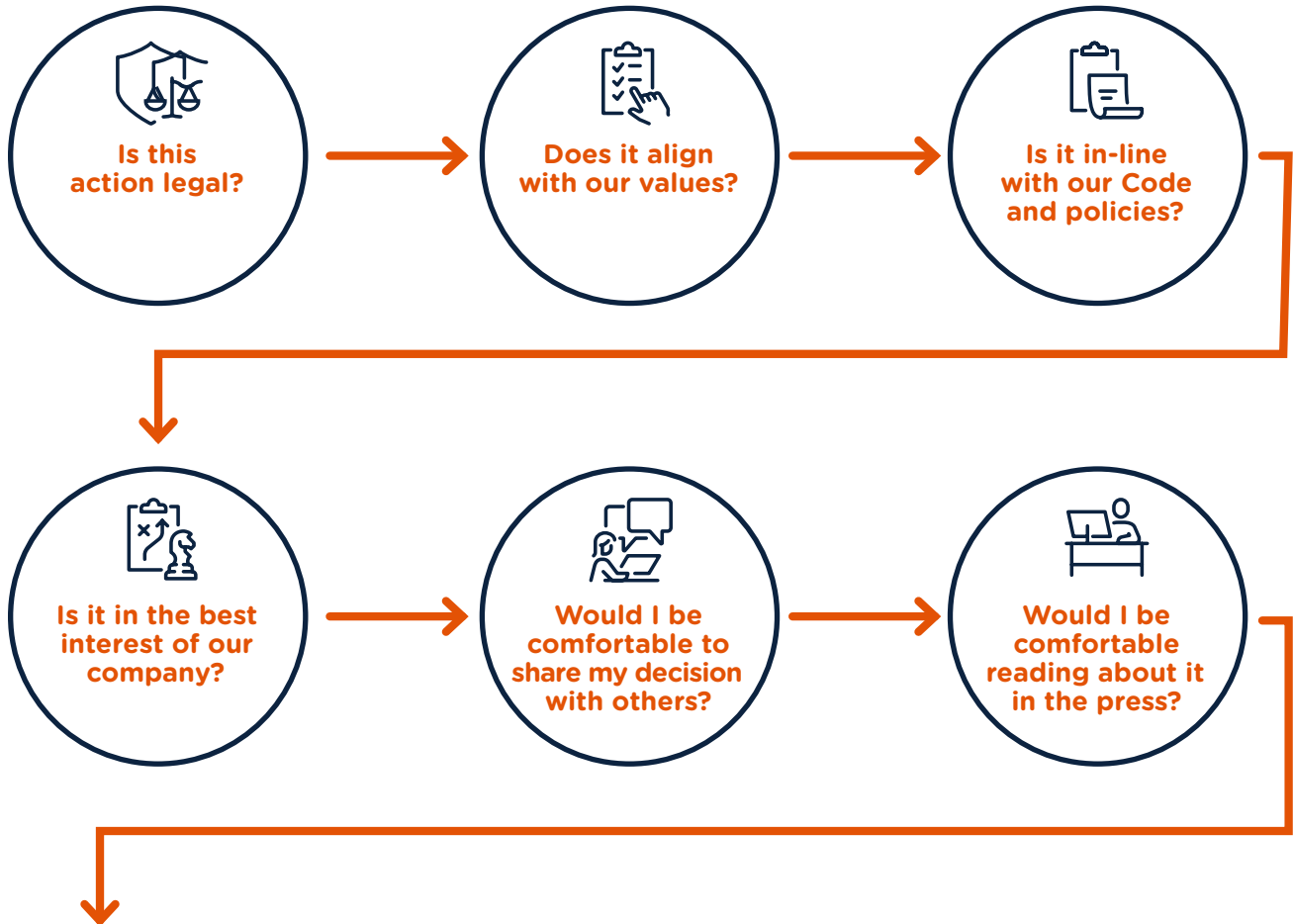


Find a remedy – If you're aware of possible misconduct, please **speak up** about it to help limit any damage or injuries.



Our decisions

When you come across a situation you feel may be inconsistent with our company's expectations, the Code is here to help you make sure we all do the right thing and act in-line with the law and our policies. If you're ever unsure, then ask yourself:



If you can answer “**yes**” to all these questions, then you’re acting in-line with our Code. However, if you’re not sure, then you should immediately **seek advice**.





Our commitment

We're committed to always running our business with honesty and integrity. This is not just to protect our reputations, but because it's the right thing to do. By the same token, we want and expect all colleagues and those who work on our behalf to operate with the same high ethical standards.

Sharing your concerns

Speaking up isn't always easy, but it's the right thing to do. If you have a genuine belief that any of our employees, or any of those who work on our behalf, are not complying with our high ethical standards we want you to speak up without delay. This gives us the chance to investigate, put things right, protect individuals from harm and maintain our reputation and integrity.

We fully understand speaking up might be daunting, or you might think it's not worthwhile but staying silent won't allow us to address problems you might be facing, make improvements to the way you're working, keep colleagues safe or change things for the better.

We want to hear what you have to say and don't want fear to get in the way. It's important you know it's safe to speak up here. Here are some ways you can choose to speak up at SGN:

You can also raise concerns about any wrongdoing by contacting our external Speak Up Hotline on **0808 196 5838**, or [online](#).

This confidential service is operated by an independent third-party provider and is available 24/7. While it's preferable to identify yourself when reporting your concerns, the Hotline does give you the option to remain anonymous.

Know that you're protected

One of the biggest fears people have when speaking up is whether they will be retaliated against for doing so. With that in mind, please be assured we have a zero-tolerance policy towards retaliation. We won't allow anyone to silence you. If they try, we want you to speak up about that as well. It's the only way we can fully protect you and your colleagues.

So please feel safe to speak up, in good faith, and know that we won't stand for any resulting dismissal, demotion, reduced pay, exclusion or any other form of retaliation.

Speak Up Options





Acting responsibly

Safety, health and wellbeing

Environment/sustainability

Physical security

Volunteering and charitable work

Human rights





Safety, health and wellbeing

Our commitment

Safety is central to our work and values, and **your** safety is our top priority. To help ensure you stay safe and well at work, we regularly implement safety training, policies and procedures, and we swiftly respond to all reported health, safety and wellbeing concerns.

Our shared responsibility

Always keeping safety top of mind.

Follow the rules

By taking simple precautions, you can prevent harm to yourself and others. We all want to have a safe place to work, so be sure to:

- > Understand and follow any policies or safety requirements that apply to your job
- > Complete required training and only operate equipment on which you are trained
- > Wear personal protective equipment at all times where required
- > Follow posted warning signs and restrictions
- > Keep an orderly workplace and report or replace any unserviceable kit
- > Take breaks away from the desk
- > Keep equipment in good working condition
- > Pay attention to workstation ergonomics such as seating positions, etc.
- > Wipe up spills and slippery surfaces
- > Watch out for hazards and put others on notice as well
- > Find ways to manage **stress** and consider using resources in your Mental Health Toolbox where appropriate
- > Report any potential dangers, including suspected substance use at work, contamination or any violent acts or threats

Come with a clear head

An integral part of workplace safety is ensuring everyone reports to work safely and is ready to work. Life can present us with challenging situations both in and out of work, some of which may impact our ability to concentrate. Medical conditions, medication, stress at work or home, mental health issues and substance misuse can impair judgment. If you've any concerns about your or a colleague's ability to work, then please speak up. Your safety is paramount, and we're here to help and protect you.

To improve your health and wellbeing:

- Make health improvements in terms of diet, exercise, smoking and sleep
- Limit alcohol consumption and avoid misuse of other toxic substances
- Plan and prioritise your work effectively
- Talk to your supervisor, or to HR, with concerns about your work, personal health or your ability to cope
- Use our Employee Assistance Programme and consider other company supports such as My Mind Pal and the GP Helpline
- Use the procedure outlined in our Harassment Policy if you have been subjected to bullying or harassment

Doing the right thing

My GP just prescribed a new medication for my migraines. I'm not sure how it will affect my judgment. What should I do?

Speak to your supervisor about anything that could impair your job performance. That way we can take the proper steps to keep you and those around you safe.

Learn more

Drug and Alcohol Policy

Policy Against Harassment at Work

Stress Policy



A
HELPING HAND



Environment/sustainability

Our commitment

Because we believe in decarbonising the planet while also protecting it, we've committed to cutting our greenhouse gas emissions to net-zero by 2045. That will be achieved in a number of ways including reducing leakage from our pipes, looking to using only 100% renewable energy and moving to zero-emission vehicles. We'll do everything we can to ensure a greener, more prosperous future.

Our shared responsibility

Taking direct action on climate change.

Understanding and implementing our environmental strategy

Our environmental strategy is built around five pillars which demonstrate our long-term commitment to the environment. They are:



Net-zero business carbon emissions



Engage with our supply chain, working towards a net-zero commitment



Transitioning towards a circular economy



Biodiversity net gain on land we manage and strive to enable carbon sequestration



Support the hydrogen pathway for UK net-zero target

Adopt the United Nations (UN) Sustainable Development Goals (SDGs)

Achieving net-zero is so much more than reducing our carbon footprint. For a fair and just future for all, we need to do more. That's why we're aligning our Environmental Strategy with the 17 sustainability goals developed by the UN, including:

- > SDG 3 health and wellbeing – by changing the way we all think and act about mental health and creating a supportive environment for everyone
- > SDG 5 gender equality – by eliminating any gender bias from our HR processes to ensure we reflect diverse needs
- > SDG 7 affordable clean energy – by positively impacting society by supporting vulnerable communities and providing excellent service

Doing the right thing

When eating and drinking:



DO Use re-useable containers if you bring your own lunch.

Use a re-useable mug when you buy a take-away hot drink. Some coffee shops will even give you a discount!

Use a re-useable bottle to top up your water to ensure you stay hydrated throughout the day.



DON'T Use plasticware, in particular not single-use plastics. From the manufacturing process to the non-compostable product itself, plastic takes a hefty toll on the environment.

When using electricity:



DO Switch the light off when you leave a meeting room.

Switch your computer off when you have finished working, and set it up in energy-saving mode so it saves power when idle.



DON'T Leave the lights on in rooms that are not in use, or leave your computer on when you're not working. Turning them off will save both electricity and money.

When you have waste:



DO Make sure to use the correct waste bin or skip. These are clearly marked. Re-use is the best option and anything that can be recycled should be.



DON'T Throw tins in the plastic recycling. Contaminated waste might have to go to landfill altogether and that has a big impact on the environment, and it also costs more money.

Learn more

SHE Policy

Environment Strategy

UN Sustainable Development Goals



Physical security

Our commitment

In our increasingly digital world, the idea of security is often focused on data and cybersafety. However, our physical assets are just as integral to our growth, value and success. We're committed to protecting our people and assets and aim to provide a safe working environment.

Our shared responsibility

Caring for what's ours so we can continue to keep our customers, our people and our communities safe and well.

Know what to protect

From our infrastructure to our ID badges, our physical assets include everything we can see and touch that helps us get the job done. We take great care of them all, including our:

- > Land
- > Inventory
- > PPE
- > Office supplies
- > Credit cards
- > Materials and fittings
- > Machinery
- > Tools
- > Fleet vehicles

Handle with care

We use our physical assets in the way they're intended to be used (never for any activity that's improper or illegal), and we protect them from theft, fraud, waste, damage and loss. Also, we never borrow, lend, sell or give items away, unless authorised to do so. By safeguarding our physical assets in this way, we keep them in good condition, safe to use and prolong their life.

Limit personal use

We never use our assets for personal gain, and we make sure they're reserved for the benefit of our company.

We do, however, understand that occasional, personal use of assets such as phones and computers may be permitted if the use doesn't violate the law or our policies or interfere with our work.

Enhance workplace security

To help ensure the security of our physical assets, we must each:

- > Follow any work safety information and training provided to us
- > Follow all safety and security rules and practices
- > Cooperate with those who enforce the rules and practices
- > Take the necessary steps to protect ourselves and others
- > Immediately report all accidents, injuries or unsafe practices or conditions

Doing the right thing

I'm packing for a work trip in the morning and don't want to forget my laptop and ID badge. Would it be OK to leave them in my car overnight?

No, that wouldn't be the best decision. If the wrong person sees you placing something valuable in your car, it could make you more vulnerable to theft. Consider placing these items in your work bag then leaving your bag inside by the front door, to easily grab on your way out. That way your items remain safe and protected.

Learn more

Management Procedure for Physical Security of Assets

Management Procedure for Physical Access Control

Management Procedure for CCTV and Surveillance Cameras





Volunteering and charitable work

Our commitment

We go beyond our provision of products and services to support the communities in which we operate. Not only do we keep our customers safe and warm, we recognise and deliver our social purpose by helping to support those in vulnerable situations and in need of additional help, supporting charitable initiatives and giving back to the community.

Our shared responsibility

Improving the communities where we live and work.

Take advantage of our Community Action Programme

Our Community Action Programme (CAP) gives our people the opportunity to volunteer for charities or good causes on company time. Each employee is given one day each year to get together with colleagues and get involved in volunteering activities to make a difference in their local community. It also greatly enhances comradeship within teams and provides our people with a great sense of achievement.

The way individuals spend their CAP time is largely up to them. However, examples of ways we have helped in the past include building a new driveway for a disabled customer, painting walls in community centres, giving a new lease of life to tired playground and garden areas and even helping create a new home for rescued lions.

Into Action Fund

With our Into Action Fund, we support employee fundraising efforts by matching up to £500 of money raised for any United Kingdom registered charity. We're proud of all our colleagues who give their time to raise money for excellent causes and are delighted to help boost their totals through our Into Action Fund donations.

Supporting our corporate programmes

In addition to supporting our colleagues in their volunteer and fundraising efforts, we invest in company-wide and local projects hoping to make a difference, including UK Says No More, which provides online safe spaces for victims of domestic abuse to access support and information.

Doing the right thing

When volunteering:



DO Take advantage of the company time granted to you through the Community Action Programme.



DON'T Take on anything unlawful or that would create a conflict of interest with the work you do.

When giving:



DO Make a bigger impact by utilising the Into Action Fund.



DON'T Pressure or ask customers, vendors or colleagues to support your favourite charities during work hours.

When sharing information:



DO Inspire others to volunteer by sharing out ideas you have implemented in the past.



DON'T Reach out to organisations which would reflect poorly on our company.





Human rights

Our commitment

Human rights are the very fabric of our society. They shape our way of life – protecting our freedom and providing us the tools we need to live with fairness and dignity. They're relevant to us all and protecting them is everyone's responsibility. By following the law, staying alert and speaking up if we see anything that violates our commitment to human rights, we can help ensure everyone in our company and across our communities has the support they need.

Our shared responsibility

Respect and protect the rights of everyone, everywhere.

Know we're here for you

We value the time and talent you bring to our company and understand our responsibility to provide you with a fair living wage and balanced life. That's why we:

- > Comply with all applicable laws concerning pay, benefits and working conditions
- > Put safety at the top of the agenda
- > Promote the health and wellness of all our employees
- > Encourage you to take the breaks and days off you're entitled to

Support our efforts

Please help support our efforts to protect human rights. You can do this by knowing and upholding our prohibitions on modern slavery, child labour, forced labour, human trafficking, physical punishment and any other harmful activity. Also, find ways in your day-to-day interactions to promote diversity, respect and fairness with others and in our employment practices.

Monitor third parties wisely

If you work with third parties, make sure they share our commitment to protecting human rights. Don't do business with any organisation that engages in human rights abuses. That includes sourcing materials responsibly.

Learn more

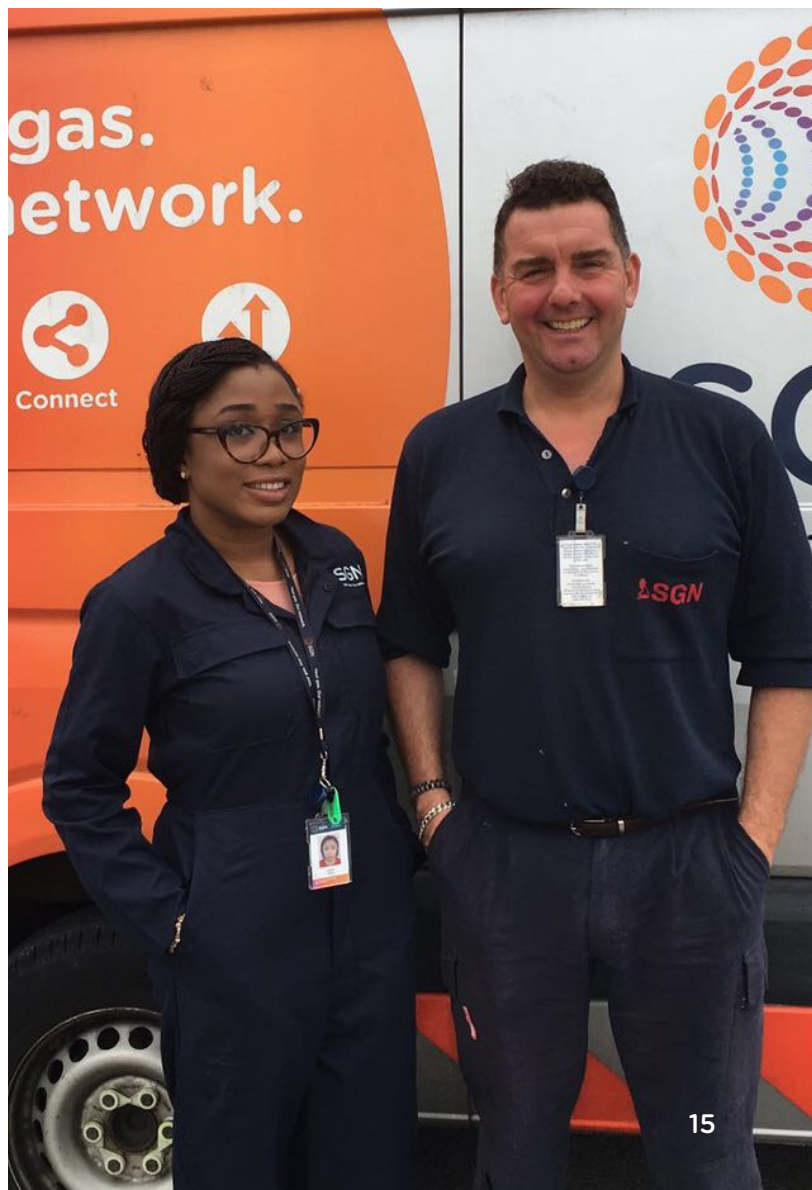
Modern Slavery Statement

Compulsory Modern Slavery training is available on People Portal, and we expect you to complete this when it is assigned to you.

Doing the right thing

I saw a story posted on social media about one of our suppliers. It suggested that they may have been involved in an incident related to unfair employment practices. Since it hasn't been proven and it doesn't involve SGN, do I need to take any action?

Yes. We hold our suppliers and all our third parties accountable to our high standards. If there's even a hint of improper behaviour, you should report your concern. Even if there's no direct connection between the allegations and the work they do with us, we should know what's going on so we can evaluate how to act.





People and behaviour

Diversity and inclusion

Anti-harassment

A psychologically
safe workplace





Diversity and inclusion

Our commitment

We're innovating for a brighter net-zero future for our gas networks, and we need the diversity of thought and experience which will help us continue to fuel innovation and deliver value to our colleagues, customers and communities.

That's why we recruit people with a wide range of experiences, backgrounds and beliefs, but we don't stop there. We go beyond just attracting the right talent, and we work hard to keep them.

By celebrating diversity and promoting inclusion, we empower our workforce to stay, to grow and to give their best. All this makes our company a better business.

Our shared responsibility

Developing and supporting a diverse and inclusive environment.

Building a diverse workforce

When we talk about diversity, we're talking about everything that makes us unique. After all, everyone's different. Each of us brings an individual blend of backgrounds, circumstances and experiences, and each of us deserves to be our true selves at work. To help foster a sense of belonging, let's work together to uncover any bias we may have so we can base employment-related decisions on objective criteria. We want everyone not just to work with each other, but support, reach out to and advance others, because they're qualified and bring value to our team. And not because of any unfair assumptions or generalisations.

Making the most of your individuality

Right across our company we want all our people to have the confidence to contribute and be who they are. Feeling this way comes from everyone understanding what makes people different and valuing the benefits that diversity brings. It also comes from being aware of the impact we have on the people around us. It's important to recognise your own unique talents and take advantage of opportunities for training and personal development, to not only advance yourself and your career, but to also set an example to the people around you.

Treating others the way THEY want to be treated

The age-old golden rule says you should treat others the way you want to be treated. But let's shift the focus there a bit. When you're dealing with people with different backgrounds, understandings and sets of standards, what you want from a situation may not be what they want. Make it your business to find out how those around you wish to be treated and act accordingly. By doing so, you help foster a desirable environment of empathy, respect and belonging.

Doing the right thing

When hiring:



DO Base your decision on the candidate's knowledge, skills and abilities.



DON'T Base your decision on whether you'd like to have a cup of coffee with them. We should never let personal subjectivity get in the way of hiring a talented, diverse candidate.

When a colleague makes an offensive comment:



DO Tell your colleague how they've made you feel. If they don't stop, report your concern.



DON'T Suffer in silence. We can only correct the mistakes we know about.

Learn more

[Equality, Diversity and Inclusion Policy](#)

[Diversity and Inclusion Ambition](#)

[Race and Privilege Guide](#)

[Faith and Belief Guide](#)

[Gender and Sexual Orientation Guide](#)

[Disability and Neurodiversity Guide](#)





Anti-harassment

Our commitment

All our people are the heart of our business. Your professionalism and efforts help keep warm millions of homes and help businesses thrive across the south of England, Northern Ireland and Scotland, ensuring our local communities benefit. However, for every one of us to keep doing our jobs effectively, it's important we all have a work environment where we can thrive as well.

That's why we support and protect you doing your jobs by creating a workspace that's safe, respectful, free of intimidation, bullying and abuse. Of course, we've policies in place that prohibit these bad behaviours, but we also recognise respect is not just about a policy.

It's an unspoken standard which we all uphold in every exchange, passing and interaction. By honouring this unspoken commitment, and each other, we empower everyone in our company to be their best self.

Our shared responsibility

Always conducting ourselves in a proper, fit and professional manner.

Identify unacceptable conduct

We have a zero-tolerance policy when it comes to sexual harassment, racial harassment or any other form of harassment. This may constitute behaviour which is abusive, humiliating, personally threatening, offensive, socially unacceptable or which fails to respect the individual rights of others.

It's not always easy to recognise these inappropriate behaviours, but examples include:

- > Unwanted physical approaches, such as unnecessary touching or abusive gestures
- > Unwanted verbal behaviour, such as nicknames, comments, innuendos, banter or insults
- > Bullying of any kind, including humiliation, intimidation, ridicule, personal abuse or persistent unfounded criticism

Know the impact of your actions

Harassment is not about intent, it's about impact. If someone reasonably perceives your treatment of them as harassing or disrespectful, saying it wasn't your intent is not an acceptable excuse. Work with that person to understand how your actions negatively affected them, apologise, and be sure to behave differently going forward. Every interaction you have at work or connected with your work should not only be positive and professional but perceived as such by those around you.

Step in when appropriate

As important as it is for each of us to treat others with dignity and respect, we must also speak up when we see others failing to meet this standard. If you witness or overhear a colleague treating someone else poorly (whether that other person works for us or not), ask your colleague to stop, then report the behaviour. Your voice is an integral part of ensuring our company remains a positive, collaborative and inclusive place to work.

Learn more

Policy Against Harassment at Work





A psychologically safe workplace

Our commitment

It's important everyone feels they can speak up without worrying about there being consequences. We want to create and maintain an open culture where our colleagues can raise both ideas and concerns freely.



We can't reap the benefit of a diverse group unless everyone in our company feels confident enough to share their unique thoughts, concerns, ideas, opinions and mistakes. This level of comfort happens when there's a collective belief that colleagues will not embarrass, reject or punish others for speaking up. In other words, it happens when everyone feels psychologically safe enough to make it happen.

That's why we work to build interpersonal trust and a culture where people feel safe to speak up. We want you, and those around you, to feel free to collaborate, take risks and innovate together.

Our shared responsibility

Creating an environment where we all feel encouraged to contribute in meaningful ways.

Check in with yourself

When we each feel accepted in the workplace, we're more likely to reach our full potential.

Periodically ask yourself if you feel a sense of belonging in our company, to ensure we're doing our part to create an environment that's the right psychological fit for you.

A great starting point is asking yourself if you feel safe to:

- > Be yourself and connect with others
- > Ask questions, give and receive feedback, experiment and make mistakes
- > Use your skills and abilities to make valuable contributions
- > Challenge the status quo when there's an opportunity to do something better

If any of your answers are "no" or "I'm not sure," then there's work to be done. Reach out to a manager, or someone you trust, so we can find ways to help you.

Help your manager help you

It's important to know our managers have multifaceted positions. Not only are they responsible for substantive work and delegating responsibility appropriately, but they also take the lead when it comes to nurturing and promoting their team's psychological safety. Ways they do so include:

- > Making it a priority
- > Encouraging everyone to speak up
- > Listening to concerns
- > Helping others learn from failure
- > Rewarding new ideas, no matter how out-of-the-box
- > Embracing positive challenges

Managers can best apply these principles when their entire team is on board so, understand your manager's objectives and provide support whenever possible.


Doing the right thing


When meeting with colleagues:

 **DO** Ask open-ended questions and listen to understand.


 **DON'T** Cut off others' voices and thoughts - we all need an opportunity to be heard.


When you need help:

 **DO** Ask for it. And freely give it when help is needed from you.

 **DON'T** Try to figure everything out on your own. We are a team for a reason.

When expressing appreciation or disappointment:

 **DO** Be open and honest, so that positive behaviour is encouraged and negative behaviour is corrected.

 **DON'T** Hide your feelings. We embrace constructive challenges and, even when we disagree, we support each other throughout the process.

Learn more

Speak Up (Whistleblowing) Policy

Leader and Manager Essentials



Conflicts of interest

Conflicts of interest

Interactions with suppliers
and other third parties





Conflicts of interest

Our commitment

We are proud to be a part of the SGN team – a dynamic group with diverse interests, relationships and activities both in and out of work. We also trust your professionalism and that of those who work on our behalf. However, to protect ourselves and our company from criticism or compromise, we must disclose conflicts of interest or potential conflicts of interest and take steps to avoid or manage them.

Conflicts of interest are situations where your relationships, interests or activities could affect your ability to make objective business decisions, and where your association could be viewed as affecting your impartiality in the way you do your job or your motivation to always do what is best for our company.

Our shared responsibility

Ensuring we always act appropriately and entirely in our company's best interests.

Know what to look for

It's not possible to list every scenario that could present a potential conflict of interest, but here are some examples:

- > Being involved in the procurement of a potential supplier with which you have a personal association
- > Engaging a supplier to do work in your home when you are also involved (as an SGN employee) in procuring or allocating work to that same supplier
- > Having a second job that conflicts with your responsibilities to our company
- > Supervising a family member or partner where you have authority to sign off their time sheets/expenses/salary progression forms

Play safe

Should you feel you're in a position giving rise to an actual or potential conflict of interest, then in accordance with our Conflicts-of-interest Policy and Employee Rules, you must disclose it. If you're uncertain how the Conflicts-of-interest Policy might affect your activities, please contact your manager in the first instance.

Ask the right questions

When trying to avoid a conflict of interest, ask yourself:

- > Could my personal interests or relationships influence my professional judgment and/or decisions when working for or on behalf of SGN?
- > Could it be interpreted (or misinterpreted) in such a way by someone else?

If the answer to either question is "yes", then don't take any further action until you've consulted with your manager. You or your manager may also contact the **Compliance team** if further advice is required.

Doing the right thing

When you're on the recruiting panel for a role within SGN and a close friend applies for that role:



DO Disclose your potential conflict of interest and excuse yourself from the recruitment process.



DON'T Share out the interview questions with your friend and promise to persuade the recruitment panel to give them a job.

When offered a part-time role with another organisation:



DO Disclose this to your manager before accepting the role and discuss any potential conflicts this may cause plus ways to mitigate this. Complete a Conflicts-of-Interest Form if you identify any.



DON'T Accept the new role and don't mention it to your manager.

Learn more

Conflicts-of-interest Policy

Employee Rules

Compulsory Business Ethics training is available on People Portal, and we expect you to complete this when it is assigned to you.





Interactions with suppliers and other third parties

Our commitment

From our pipelines to our business partners, we are a business of connections. The exchange of goods, services and ideas with other organisations helps us thrive, and we value the relationships we have with our vendors, suppliers, contractors, consultants and other third parties ("suppliers").

In fact, we work so closely with our suppliers, they can often be seen as a reflection of our organisation. Under certain circumstances, we can also be held liable for their actions. That's why we exercise caution and perform proper due diligence when selecting suppliers, only working with those who meet our high standards of integrity. We'll always monitor their performance closely.

Our shared responsibility

Valuing our suppliers and ensuring they uphold our high standards.

Make the right choice

We want to make sure we work with those who share our values and meet our business needs, so prior to considering a supplier, we ensure full compliance with internal procurement processes and procedures. During the selection process, due diligence will be conducted and can include:

- > Checking business registrations
- > Verifying trade accreditations
- > Checking public documents and sources
- > Reading news articles
- > Searching the internet
- > Speaking to previous customers

A fair and impartial selection process must be undertaken in accordance with internal and external governance, where decisions are based solely on objective award criteria (like quality, cost and availability) and not personal bias. This is essential.

Work collaboratively

Once a supplier has been identified in accordance with the objective award criteria, it's then important we foster a relationship of transparency and collaboration. Let's ensure we:

- > Secure full hierarchical approvals
- > Progress only when terms and conditions have been agreed to
- > Set expectations at the outset
- > Communicate regularly and monitor them closely

Doing the right thing

I'm working with a supplier for the first time and want to ensure I'm monitoring them appropriately. What red flags should I be looking out for?

It's not possible to put together an exhaustive list so, ultimately, it's best to use your good judgment and speak up when you have any doubts or concerns. However, some examples could be: not declaring a potential conflict of interest, requesting a large upfront payment before providing a service, requesting a cash payment or refusing to provide expense details.

Learn more

Compulsory Business Ethics training is available on People Portal, and we expect you to complete this when it is assigned to you.





Anti-corruption and transparency

Bribery and corruption

Gifts and entertainment

Political and government
engagement

Fair competition





Bribery and corruption

Our commitment

We're committed to act legally, professionally and fairly in all our relationships and business dealings. Our zero-tolerance policy towards bribery and corruption helps us maintain the trust of our colleagues, customers and others we work with and applies to all our employees, as well as third parties who act on our behalf.

Our shared responsibility

It's vital we conduct all our business in an honest and ethical manner. The prevention, detection and reporting of bribery is the responsibility of all employees.

Always aspire to do the right thing

Always aspire to do the right thing while working for or representing our company. This means we:

- > Act with honesty and integrity
- > Never commit (or be involved in, turn a blind eye to or cover up) fraudulent, corrupt or dishonest activity or wrongdoing of any kind
- > Never accept, solicit or offer bribes or other inappropriate 'favours for favours'
- > Prevent the use of our operations for money laundering or any activity that facilitates money laundering, the financing of terrorism or other criminal activities

Be able to recognise a bribe

We often think of a bribe as a cash payment, but a bribe can take many other forms such as a favour, a business opportunity, a loan, a lavish gift, costly hospitality or even a charitable or political donation. Although there can be various types of bribes, there's one single message we must keep in mind. This is – anything of value that's offered to encourage or reward someone for doing something improper is a bribe and prohibited both by our policies and the law.

Take care in dealings with government and public officials

Our commitment to operating honestly and ethically extends to every aspect of our business. We never offer anything of value to a government or public official or representative. Even small payments to speed up routine, administrative tasks (called 'facilitation payments') are prohibited under the UK's Bribery Act and our policies.

Choose and manage third parties carefully

Due diligence must be undertaken on third parties to establish their anti-bribery controls, and we must make sure our contractors, suppliers and agents all know what our Anti-bribery and Corruption Policy requires of them, and they also act with honesty and integrity.

We **can** be held accountable for bribes made by those who work on our behalf. If you're responsible for making decisions about our suppliers and other third parties, make sure you consider a potential partner's reputation for operating with integrity and in compliance with the law. Any third party we engage should observe the same high standards we do. We have a duty to communicate what we expect, and you should report any suspected acts of bribery or corruption immediately.

Doing the right thing

When a supplier offers your wife a job but expects you to ensure we grant them work in return.



DO Reject the offer and report it immediately to the Compliance team.



DON'T Accept or even discuss such an offer. To accept the offer would be a criminal offence under the UK's Bribery Act.

You are involved in a tender event, and a prospective supplier says they can arrange for repair and improvement works to be carried out at your home for free, as a gesture of 'goodwill.'



DO Reject the offer and report it immediately to the Compliance team.



DON'T Accept or even discuss such an offer. To accept the offer would be a criminal offence under the UK's Bribery Act.

Learn more

Anti-bribery and Corruption Policy

Corporate Hospitality and Gifts Policy

Anti-Money Laundering Policy

Compulsory Business Ethics training is available on People Portal, and we expect you to complete this when it is assigned to you.



Gifts and entertainment

Our commitment

We recognise corporate hospitality provides a great opportunity to develop good relations with those we do businesses with. But when an offer goes too far or is offered too frequently, it can cause others to question our motives and our integrity. Our Corporate Hospitality and Gifts Policy helps to ensure nothing given or received is improper or could be perceived by others as inappropriate.

Our shared responsibility

Ensuring offers of gifts and hospitality are managed in-line with our Corporate Hospitality and Gifts Policy.

Know what's permitted

When considering what you can give or accept, remember any gift or offer of hospitality must be proportionate and for a legitimate business purpose.

Follow our Corporate Hospitality Register procedure

Transparency and clear documentation help us to ensure we're conducting business in an ethical way. Consult and comply with the guidelines outlined in our Corporate Hospitality and Gifts Policy to make sure anything you give or receive is properly accounted for.



Gifts must be

- Reasonable and proportionate
- Justifiable on business grounds
- Authorised and recorded, where required



Always

- Reject offers that do not involve the donor person being present
- Decline and escalate any offer of disproportionate value or questionable purpose



Never

- Ask for gifts or hospitality
- Accept gifts of money
- Accept or give bribes
- Use your authority or office for personal gain





Gifts and entertainment

When to authorise and record gifts?



One-off token gifts like a pen or diary or a cup of coffee

- Don't declare
- Don't record on Register



Other one-off gifts under the financial threshold in the current Policy

- Declare to Manager
- Don't record on Register



One-off business meals, provided you have authorisation from your Director

- Obtain Director Authorisation
- Don't record on Register



Any other gift or hospitality

- Obtain Director Authorisation
- Record on Register (Even if you refuse)

Doing the right thing

When a contractor offers you Premier League Football tickets:



DO Politely refuse if the contractor does not intend to go with you, and advise the contractor that our company policy prohibits you from accepting them. If the contractor intends to go with you then report the offer to your manager, so that authorisation can be sought from your Director. Enter the offer on our Corporate Hospitality Register.



DON'T Accept the football tickets out of respect to the contractor, but let them know that based on company policy, you'll not be able to accept gifts like these in the future. Do not mention the gift to anyone.

When you are in the middle of a tender process to appoint a new service provider:



DO Remember it's not permitted to accept anything of value from third parties involved in the procurement process.



DON'T Disclose commercially sensitive information about third parties involved in the process.

Learn more

Corporate Hospitality and Gifts Policy

Anti-bribery and Corruption Policy

Compulsory Business Ethics training is available on People Portal, and we expect you to complete this when it is assigned to you.





Political and government engagement

Our commitment

We operate in the public eye, 24/7. To run our business and operations, we must engage constructively with politicians as well as local, regional and national government officials. It's important for us therefore to build and develop good relationships, and as part of this, we must ensure we manage those engagements and relationships appropriately and with transparency.

Our shared responsibility

Building ethical relationships with politicians and government officials everywhere we operate.

Be a good partner

Transparency, accountability and openness are essential to maintaining appropriate relationships with the government agencies we work with. We follow all applicable laws and regulations and make sure our third parties follow them as well. In every government-awarded business we:

- > Compete fairly and ethically throughout the bidding and negotiating processes – obtaining information only in ways which are appropriate
- > Protect any government property or sensitive information that's entrusted to us
- > Properly conduct and document any required testing, inspections or programmes
- > Only submit documents and reports which are accurate and truthful
- > Speak up if we see any signs of potential misconduct

Engage with integrity

We recognise conducting business with the government and political stakeholders can be complex and can vary based on location. However, one thing which never wavers is our commitment to comply with laws that prohibit bribery and corruption. All political donations, irrespective of materiality, made on behalf of the company (directly or indirectly) must be compliant with all applicable laws and regulations and approved in advance by the Executive Committee or Board. We never offer or accept anything of value, either directly or indirectly, to gain an improper advantage for ourselves or our company. We also prohibit facilitating payments to expedite a government permit, licence or action.

Keep a record

We always let our **External Affairs team** know when we're meeting or working with any of the following on our company's behalf:

- > A politician
- > A member of the UK Government or government department (such as the department for Business Energy and Industrial Strategy [BEIS] or Her Majesty's Treasury)
- > A member of the Scottish Government
- > A member of a non-governmental organisation (such as the Committee on Climate Change)

If in any doubt, please contact our External Affairs team directly.

We also ensure these engagements are recorded on our stakeholder relations management database (SRM). This is to ensure we maintain corporate knowledge. It acts as a record if a third party places a Freedom of Information request into a public body.

Doing this also helps us audit our engagement and meet our requirements to comply with the Scottish Lobbying Register, as set out in the Lobbying (Scotland) Act of 2016.

Transparency as to who we're meeting and why we're meeting them is a vital part of protecting our reputation and building trusted relationships with our stakeholders.

We also comply with the Association of Professional Political Consultants (APPC) Code, the Bribery Act and the Political Parties, Elections and Referendum Act.





Fair competition

Our commitment

Fair competition makes for a thriving marketplace. When everyone has an equal chance to succeed, it leads to advancements within our industry, like innovative services and new ways of doing business.

What's our part in this? For us, it's all about working honestly and ethically. We don't resort to unethical business practices to get ahead. Instead, we let the quality of our services fuel our success.

Our shared responsibility

Winning business and awarding supplier contracts based on merit, compliance and fair practices.

Compete ethically

We stay ahead of the game by generating fresh ideas and finding new ways to do business, not by pushing others out of the market, breaking our licence conditions, or any procurement or competition laws. We work compliantly and transparently to avoid even the appearance of something improper. Specifically, we:

- > Seek legal advice before entering arrangements that might be viewed as anti-competitive (including agreements to share confidential or commercially sensitive information, if unsure)
- > Always act fairly and not place anyone at an unfair commercial advantage or disadvantage, including affiliated companies
- > Remain objective, fair and non-discriminatory in all dealings with potential customers and suppliers
- > Keep documented evidence of decisions and interactions with customers, suppliers and competitors
- > Ensure resources are not cross subsidised between SGN Group companies

Avoid improper agreements

We never enter into any agreements with competitors or suppliers, formally or informally, which could limit competition. An informal understanding or agreement that may affect competition will be treated by the competition authorities and our regulators in the same way as a formal legal agreement. So, you should completely avoid any conversations about:

- > Manipulating the outcome of a competitive bid
- > Raising, setting or holding prices
- > Dividing markets, territories or customers
- > Preventing companies from entering the market
- > Refusing to deal with a particular competitor or supplier
- > Restricting production, or output

Gather competitive information the right way

We base our work on well-conducted market engagement and research. However, in everything we do we must ensure the steps we take are legal, compliant and ethical. That's why we always use good judgment when searching for new information. Internet searches and customer feedback are great ways to learn more. Use honest methods and document the publicly available sources supporting your research.





Fair competition

Doing the right thing

When hiring suppliers:



DO Ensure you understand and comply with our Procurement Code of Practice and Business Separation Procedure.

Consider applicants based on the knowledge and experience they have in relevant business or technical areas.



DON'T Appoint suppliers without full hierarchical approvals. Employ anyone as a means of gaining access to trade secrets and the sensitive information of others.

When you're conversing with suppliers (including other SGN Group companies):



DO Follow our Confidential Information Policy. Keep conversations about work short and general. Maintain records of all discussions during competitive processes.



DON'T Talk about competitor pricing, production, marketing, inventories, product development, territories, goals or the like.

When finding inspiration from others in the industry:



DO Respect everyone's intellectual property rights.



DON'T Copy the patents, trademarks, copyrights or trade secrets of another company.

Learn more

[Confidential Information Policy](#)

[Business Separation Procedure](#)

[Procurement Code of Practice](#)

Compulsory Business Separation training is available on People Portal, and we expect you to complete this when it is assigned to you.





Information and communication

Data Privacy and cyber resilience

Responsible communications

Confidential information

Records and data management





Data privacy and cyber resilience

Our commitment

Our customers and colleagues trust us to protect their personal information shared with us. In today's data-driven world, gathering this kind of information is an essential part of carrying out our everyday business functions and activities.

That's why we're committed to handling personal information with care, and in-line with data protection laws to protect this information from unauthorised access, misuse or disclosure.

We also recognise privacy can't happen without proper security. So, each of us must adopt good cybersecurity habits and follow our policies without exception. When we do, we'll protect what's private and strengthen our relationships.

Our shared responsibility

Protecting the personal and sensitive information in our care.

Recognise personal data and your responsibilities

Peoples' identities are complicated. They're made up of many pieces of information that can identify them to others. This data is known as personal information and has value to the person who owns it. We all have a responsibility to ensure we look after the personal data of others entrusted to us and that's why it's important we all follow the data protection principles by:

- > Processing personal data lawfully, fairly and transparently
- > Collecting only the information we need
- > Ensuring personal information is adequate and relevant to our initial purpose for collecting
- > Keeping the personal information accurate and up to date
- > Holding information for no longer than is necessary and following our Data Retention Policy
- > Ensuring we've appropriate security measures in place to protect the personal data

Examples of personal information include, but are not limited to:

- Name
- Address
- National insurance numbers
- Birthdate and birthplace
- Email addresses
- Phone numbers
- Financial information
- Health records
- Photos and videos
- Thoughts and opinions

You should always follow our Data Protection Policy, Data Retention Policy and Personal Data Breach Procedure, in the event a data breach occurs.





Data privacy and cyber resilience

Practice good cybersecurity

You have the power to protect personal information and fight back against those seeking access to our systems and information. The key is following our Information Security policies, Acceptable Use of IT and Information Security Policy and adopting these simple cybersecurity habits:

- > Keep your passwords strong by updating them regularly
- > Never share your passwords with anyone or store them where others can see
- > Never open email attachments from unknown or suspicious sources
- > Forward these unopened emails onto our IT team 'Spam'
- > Secure your devices and immediately report lost or stolen devices
- > Don't access our network or send personal or confidential information over an unsecured connection, such as public Wi-Fi
- > Never connect unauthorised hardware or storage devices to your work computer
- > Only use approved and licenced software, storage and applications
- > If you're aware of a possible breach, report your concerns immediately

Doing the right thing

When using email:



DO Verify any links you click on to ensure they come from known, legitimate sources.



DON'T Click on a link without checking it's from a legitimate source. It may be someone attempting to gain access to our systems or gather personal information.

When using computers or other devices:



DO Keep your work devices secured and in sight at all times.



DON'T Leave your device in a vehicle (even if it's locked) where others can see it. We protect the devices in our care.

When managing your passwords:



DO Choose strong and unique passwords. Change them regularly. Never make it easy for others to access our systems.



DON'T Store a list of passwords on your work computer or even on a personal device.



Learn more

Data Protection Policy

Personal Data Breach Procedure

Data Retention Policy

Confidential Information Policy

Information Security Policies

Acceptable Use of IT and Information Security Policy

Compulsory Data Protection and IT Security training packages are available, and you must complete these when they are assigned to you.



Responsible communications

Our commitment

Communication is our connection to those we serve. When the way we communicate is thoughtful and honest, it helps us strengthen that connection and enhances our reputation. We're committed to consistently conveying accurate and complete information about our company and acting respectfully and ethically in our personal communications.

Our shared responsibility

Communicating with integrity around the clock.

Let our company speak for itself

The way we talk about our company matters. Just one careless comment whether spoken or on social media can have serious consequences. It can mislead or offend our customers, colleagues or the public. It can also violate the law, divulge confidential information or do lasting harm to our reputation. We rely on you to help us preserve the integrity of our communications by resisting the temptation to speak on behalf of the company, particularly on social media. You should always allow our authorised individuals to speak and respond to enquiries about our business.

Use care on social media

We act as company ambassadors whether we're on or off the clock and that includes the way we communicate. Our company respects your rights as individuals to speak out and participate in social media. But when you do, you must remember the things you say may reflect on our company. Whenever you text, tweet or share content on social media, remember to:

- > Maintain the highest levels of integrity, always reflecting our values and our commitment to integrity and respect
- > Make your communications helpful and professional
- > Be careful not to share anything harmful or offensive
- > Never share confidential information or intellectual property, no matter what it involves or how you obtained it
- > Never make it seem like you speak for SGN – make it clear your opinions are your own

Doing the right thing

A reporter contacted me requesting a comment, and I already gave an answer. Now I realise because I'm not authorised, I should have directed them to our press office. Is it too late to do anything?

No, it's not too late. Let your manager and the press office know immediately what happened. Then the company can take appropriate action and involve the right internal resources to get the right message out and prevent any damage.





Confidential information

Our commitment

We keep certain types of information confidential for important business reasons. This includes compliance with legal and regulatory requirements (such as data protection and competition law, as well as our licence conditions).

It's important we understand how confidentiality can be maintained, who has responsibility for managing confidential data and which policies and procedures govern how confidential data should be managed within our company.

Our shared responsibility

To adhere to our Confidential Information Policy, all related policies, procedures and contractual provisions with third parties.

Know what to protect

Confidential information is any information that's not in the public domain and/or is intended to be protected from disclosure. It comes in various forms (including spoken, written, printed, electronic or intangible items, such as intellectual property) and in varying levels of sensitivity. Examples of confidential information include:

- > Pricing information
- > Costs and operations data
- > Future business plans
- > Copyrights, trademarks and patents
- > Risk assessments
- > Press releases (prior to official announcements)
- > Financial statements and budgets before being published
- > Personnel files and personal employee information (birthday, salary, medical records, telephone number or address)
- > Any of the above that belongs to our customers or business partners

Because of the broad array of potential confidential information, it's best to assume all company information is confidential (treating it accordingly) until we receive confirmation otherwise.

During the course of your employment, you may be involved in the creation, development or invention of intellectual property such as concepts, methods, processes, inventions, confidential information, physical products, plans, programs, software, applications, code etc. All such intellectual property belongs to the company, and you must not do anything to jeopardise the prospect of securing or the validity of any Intellectual Property or do or omit to do any act which might be inconsistent with the company's rights of ownership in the inventions or Intellectual Property generally.

Know how to protect it

By keeping a few simple rules in mind, we can ensure one of our most valuable assets (our information), retains its value and remains protected. Let's each be sure to:

- > Follow records management policies to help label, handle, store and dispose of information the right way
- > Be aware of information security practices to avoid phishing and other forms of cybercrime
- > Do not send confidential data to unauthorised persons (including employees sending such data to their own personal email account without authorisation)
- > Do not store classified information on your personal devices
- > Follow our Acceptable Use of IT and Information Security Policy
- > If leaving the company, remember the same rules apply and never share our confidential information with potential future employers

Learn more

Confidential Information Policy

Acceptable Use of IT and Information Security Policy

Compulsory Data Protection and IT Security training packages are available, and you must complete these when they are assigned to you.





Records and data management

Our commitment

Our records and data are key components of our business. They give us insights into how we're performing. They also help us make informed strategic decisions and meet our regulatory obligations. The better we manage our records and data, the better we manage our business.

Although we may not realise it, each of us contributes in some way to our company's records. And because we do, we've a responsibility to ensure their integrity. That's why we're committed to being accurate and transparent in every business and financial record, no matter how small.

Our shared responsibility

Handling our records with care and in-line with our values.

Follow our policies and the law

Our records tell the story of who we are and how we do business. It's critical to our business and to our relationships that the picture our records paint is credible and reliable. Just one misleading or inaccurate entry could damage our reputation and lead to legal liability for those involved and for our company. We are all involved in capturing information as we carry out our day-to-day activities. And it is all of our responsibility to ensure that we accurately record information, in a way that it represents reality and in accordance with legal and business requirements.

Be honest and accurate

Every action we take as a business, whether it's an entry in a timesheet, a transaction or a report, must be supported by accurate information. We never record anything we know to be false, and we never alter, falsify or destroy our records. No matter what kind of record you may handle or update, check and double check your work to make sure the record is accurate, complete, timely and understandable. That's how we demonstrate to our customers, business partners and stakeholders (including our regulators) we can be trusted to do business ethically and honestly.

Manage records and data ethically throughout their life cycle

We supervise and administer our records and data from the time we create them through their use, maintenance and eventual archive and/or disposal. By handling our records responsibly at each stage of a record's life cycle and following our records management policies, we make sure they're retrievable when we need them, and we can rely on them to be authentic and correct. Use care every time you handle a record, make sure you store and secure it properly and follow the rules for its disposal.

Examples of our records include, but are not limited to:

- Asset records
- Database records
- Invoices
- Timesheets
- Social media
- Videos
- Contracts
- Bids and proposals
- Performance reviews
- Emails, voicemails and other correspondence





Records and data management

Doing the right thing

When you receive notice of a legal hold on a record:



DO Carefully follow the instructions for handling and retaining the record.



DON'T Destroy any document with a legal hold or any information that's needed for a court case.

When someone pressures you to alter one of our records:



DO Refuse. Make it clear that knowingly altering a record breaches our policies and our values.

Report the matter to your manager.

Always put accuracy and integrity first.



DON'T Give in to the pressure, even if the request comes from someone in management.

When participating in an investigation:



DO Cooperate fully and honestly, providing all supporting documentation. We never do anything to call our records into question.



DON'T Conceal or destroy records that have been requested.

Learn more

Data Retention Policy

Compulsory Data Protection training is available on People Portal, and you must complete this when it is assigned to you.





Useful resources

Resource:

Compliance

Anti-Bribery and Corruption Policy
Anti-Money Laundering Policy
Business Separation Procedure
Confidential Information Policy
Conflicts-of-interest Policy
Corporate Hospitality and Gifts Policy
Modern Slavery Statement
Speak Up Policy

Data Protection

Data Protection Policy
Data Retention Policy
Personal Data Breach Procedure

Human Resources

Acceptable Use of IT and Information Security Policy
Disability and Neurodiversity Guide
Diversity and Inclusion Ambition
Drug and Alcohol Policy
Employee Rules
Equality, Diversity and Inclusion Policy
Faith and Belief Guide
Gender and Sexual Orientation Guide
Leader and Manager Essentials
Mental Health Toolbox
Policy Against Harassment at Work
People Portal - Learn
Race and Privilege Guide
Stress Policy

Contact:

compliance.legal@sgn.co.uk

data.protection@sgn.co.uk

hrhelp@sgn.co.uk





Useful resources

Resource:

Safety, Health & Environment

SHE Policy

Environment Strategy

UN Sustainable Development Goals

Physical Security

Management Procedure for
Physical Access Control

Management Procedure for
CCTV and Surveillance Cameras

Management Procedure for
Physical Security of Assets

Procurement Code of Practice

Records and Data Management

Data Governance Framework

Data Life Cycle Management

Information Security Policies

Speak Up Hotline

Corporate Communications team/ Press Office

My Mind Pal website

GP Helpline

Contact:

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environment@sgn.co.uk

securityadministrator@sgn.co.uk

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