



from
**Southern
Water** 

Our Code of Ethics: Doing the Right Thing

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Our commitment to doing the right thing



Lawrence
Gosden



Keith
Lough

Integrity is visible in our work

Our Code of Ethics underpins everything we do. In this exciting period of investment and expansion in our business, there is a greater than ever expectation and scrutiny of our service delivery and ways of working. Our Code sets out the behaviours expected in all our dealings and encourages the openness and transparency necessary for us to earn and maintain trust, in building positive relationships with our customers, stakeholders and regulators.

Water for Life – Purpose, Values, and Vision

Our Code supports a clear purpose; to provide water for life to enhance health and wellbeing, protect and improve the environment and sustain the economy.

From this comes our vision, which sets out our ambition to be working together to provide sustainable water and protect the environment, today and for future generations.

We achieve our vision by following this Code and living our Company Values which are integral to our culture and underpin everything we do. How we all behave, as we do our jobs, determines how closely we align as an ethical business and our values guide our expected behaviours in doing the right thing, succeeding together, always improving, and working with care.

Working with our partners

Our Supplier Code of Conduct supports our company Code of Ethics. It demonstrates the importance of working with all our suppliers, to be a fair, caring and honest partner. The expectations we have of the standards that both the Company and its supply chain will maintain, are detailed in the Supplier Code.

Doing the right thing

The principles in this Code, guide our colleagues on reaching sound, justifiable and ethical decisions in the face of advanced developments of technologies, and changing customer expectations to provide positive outcomes for our local communities.

Our Code remains central to guiding people across all parts of our business on Doing the Right Thing. Our related training courses demonstrate that ethics is not a stand-alone consideration but underpins all we do.

Our Code also reminds us of our responsibilities as a large regional employer and the importance of looking after each other as we work to deliver reliable water and wastewater services. It informs the way we collaborate with all stakeholders to seek solutions to shared climate and ecological challenges and makes sure that our environment, and the water sources we rely on, are protected and improved for future generations.

Our commitment to doing the right thing continued

Open to scrutiny

Given rising water bills and increasing public accountability for our industry we regularly and openly engage with an Independent Customer Scrutiny Committee, to share insight, honestly discuss our activities, and answer questions on whether we are doing the right thing to honour our commitment to this Code of Ethics.

The Committee's remit is to check facts, challenge decisions and champion outcomes for customers and the environment. This scrutiny is not a performative endeavour but a genuine development of our culture of transparency and continuous improvement, and to have customers help us get things right. Our commitment to acting ethically and to this scrutiny is an investment in the trust between us and our customers.

Supporting our future work

We are focused on the delivery of our commitments under our ambitious 2025–30 business plan. When we individually and collectively align under our Code of Ethics, it strengthens our culture and gives us all the opportunity to excel. This Code underpins our inclusive workplace environment that values diversity of people and thought. Our Code of Ethics is a foundation and guide for the behaviours that demonstrate our caring ethos and connect our shared enthusiasm, skills, and capabilities to everything that we must achieve.

Our Board and the Executive Leadership Team are committed to our Values and this Code of Ethics. We expect the same of everyone in the Company as we expect from ourselves. By our joint resolve to act with integrity, honesty, and transparency we will continue to earn, maintain and improve the trust of our customers and stakeholders.



Lawrence Gosden
Chief Executive Officer



Keith Lough
Chairman



Introduction

At Southern Water, we are committed to conducting ourselves fairly, ethically, lawfully, caringly and with integrity.

Any activity or behaviour that contradicts this commitment could have a major impact on the trust and confidence our customers, regulators, colleagues and other stakeholders have in us, our reputation, our success and our ability to operate.

Every day, we have to make choices about the way we conduct ourselves. Our Code of Ethics defines the way we behave. It is more than just a set of rules. It explains how we follow our values and key policies. It represents our commitment to doing the right thing.

This guide will help us:

- understand our value – doing the right thing – and use it to guide everyday decision making
- uphold ethical standards of behaviour
- know where to go for advice or with questions or concerns
- Speak Up when things aren't right.

Our Code of Ethics (the Code) will not cover every situation and doesn't remove the need for using common sense and personal judgement. We have created an ethical quick check decision making tool (Figure 1) supported by a library of dilemmas to help you do the right thing.

By working our values into our decision making, our customers, regulators and stakeholders can be sure we're working hard to become a business they can trust and have confidence in.

Our Code of Ethics is complemented by a range of topic-specific company policies. The key ones are listed in Annex 1.



Our purpose, values and vision

Our purpose is to provide water for life to...



Protect and improve the environment



Enhance health and wellbeing



Sustain the economy

Our vision means we're committed to...

We're working together to provide sustainable water and protect the environment today and for future generations.

Our long-term priorities are linked to ESG

Environment

Protecting and improving the environment.



Society

Understanding and supporting our customers and communities.



Ensuring a supply of high-quality water for the future.



Governance

Enabling and empowering our people.



These are underpinned by our culture and values

We're committed to enabling our teams to do their best every day, improving services for our customers and the environment.



Succeeding together

Co-creating our future with customers, colleagues, stakeholders and partners.



Doing the right thing

For our customers, the environment and the health of our communities



Always improving

Actively seeking new ideas, influences and ways of working



Working with care

Taking care in all that we do; every task, every job, every time.

Our responsibilities under the Code of Ethics

No matter what job we do or where we do it, we're all representing Southern Water. As such, we can each have a direct impact on the level of trust placed in everything we do.

We all need to make sure we have read, understood, and continue to live up to the standards set out in our Code of Ethics, and – just as importantly – Speak Up when we see, hear or read something that isn't right.

Each year, we will ask each of our employees to sign up to the Code of Ethics personally.

Senior managers lead by example, are open with teams to agree what is expected, discuss examples of good practice or learning opportunities, ensure mandatory training is kept up-to-date and hold everyone to the same standard.

Many aspects of our Code of Ethics are covered in more detail in our policies (see Annex 1) and some are covered by our mandatory training materials. Ensuring we have all completed this training is important, as it provides us with more detail about some of the key ethical issues that impact our business.

Failure to act ethically will have consequences to the individuals involved. Irrespective of status, they will be subject to corrective action. This will be addressed via our people management processes and could include performance management.

We will not tolerate any form of threat or retaliation against anybody who speaks up and we will take disciplinary action against anybody who threatens or retaliates against those seeking to do the right thing.



Ethical quick check – helping you ‘do the right thing’

Sometimes we face difficult situations where the right choice is not clear. This is when your commitment to doing the right thing matters most.

Stay alert to warning signs and, if it doesn't feel right, step back and think about what needs to be done and if you need advice from subject matter experts.

Dilemma

A quick and engaging way to discuss the concept of ethics and explore decisions that could be taken is to use dilemmas. A dilemma expresses a situation where there are a range of options, but the choices we take depends on our ethical and moral compasses.

We often experience ethical dilemmas in our everyday lives. Think about the following scenario. What would you do if it was you? You are parking the car and when getting out the door knocks into the car next door. You don't know if anyone has seen this and the extent of the damage. Do you ignore the situation and carry on with your day, leave a message on the other car's windscreen or attempt to contact the owner. How might you feel if you were the owner of the other car?

Figure 1: Quick Check Decision Making Tool To help all of us make better decisions, use this quick check.



Doing the right thing for customers

We treat customers with fairness and respect

Our goal is to deliver a service that is easy for all customers to use and always provides a positive experience. To make this happen, when dealing with our customers, we should always:

- treat our customers as we would like to be treated – with care, respect and dignity
- strive to deliver the right experience, first time, every time – and if we don't, provide the appropriate compensation
- work to keep the promises and commitments we make – treating the company's reputation as we do our own.

We protect our customers' information

Our customers trust us to keep their personal data safe and secure. To achieve this, we should:

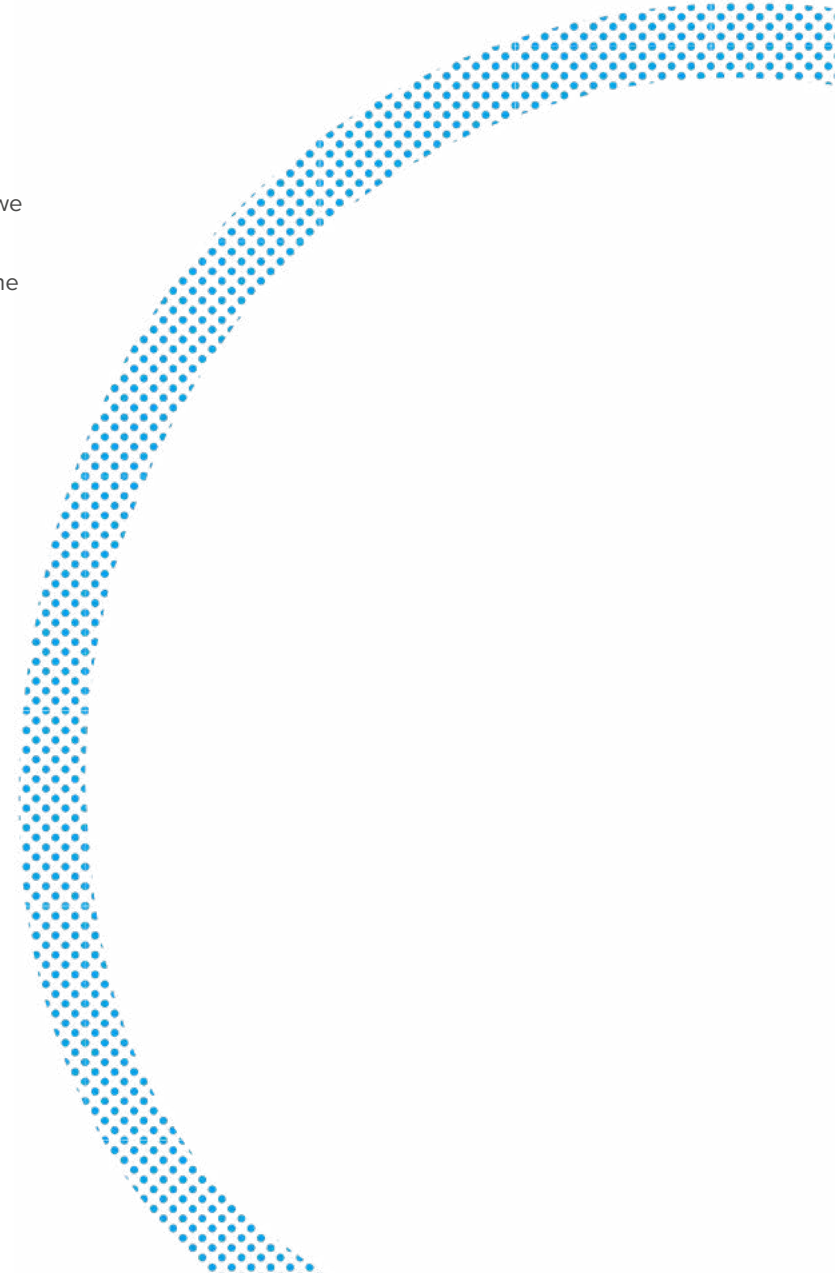
- only look up or share information if you have a genuine business need to do so
- ensure data is stored securely – to reduce the risk of loss or misuse
- report any loss or misuse of data – so customers can be informed.

We are honest and truthful

Our ability to run our business is based on information – if we don't know what is happening, we can't manage the business well.

In addition, our customers and regulators expect us to be able to provide accurate and timely information on what we do. To do this, we should:

- report what is happening, rather than what we think the recipient wants to hear
- take care when preparing information and make sure it is checked. If it turns out to be wrong later on, be honest about it and report it
- keep systems and processes for creating, storing and reporting information working. They are critical in helping us to be a transparent company
- remember that if we falsely report information it reduces trust and confidence in us as a company and we could face legal action by our regulators.



Doing the right thing for the environment and public health

We respect the environment

We have a responsibility to care for, protect and respect the environment in which we live and work – not only for ourselves, but for our customers and for future generations. We need to do everything we can to make sure our impact on the environment is as small as possible.

To help with this, we should:

- act immediately if something is going wrong to help us prevent direct impacts, such as pollution events
- maintain and correctly operate our equipment and sites – so fewer things do go wrong
- avoid unnecessary water, energy or resource usage – to help us reduce our burden on the environment
- properly dispose of any waste we create – so it can be recycled if possible
- explore any opportunities to help the natural environment – this can range from small site-specific actions through to how we plan the company's long-term activities.

We look after public health

We have a critical role in looking after public health by providing drinking water of the highest quality. To support this, we should:

- act immediately if something is going wrong we must always protect public health
- maintain and correctly operate our equipment and sites – this includes ensuring all hygiene standards are met at all times
- always put hygiene first – by complying with our Hygiene Code of Practice
- challenge any poor practice we observe – either directly by seeking advice from the SME or indirectly by using Speak Up



Doing the right thing for our business

We act with integrity and care

We are committed to conducting business with a high level of integrity, to care for and give fair and proper consideration to the needs of our customers, regulators, colleagues, other stakeholders and supply chain. To do this, we should:

- treat everyone in a fair and respectful manner
- act with skill, care and diligence
- strive to be objective and take steps to reduce bias in decision making
- disclose and resolve conflicts of interest
- ensure judgement or decisions cannot be influenced (e.g. avoid gifts or hospitality).

We use company resources, assets and information responsibly

We're all responsible for making sure we use the company's resources and assets to perform our work in a responsible and careful manner.

To achieve this, we should:

- ensure we spend money wisely
- protect assets from damage, theft, loss or misuse
- remember that some of the information we deal with has to be treated confidentially (including personal data about customers and employees).

We respect our supply chain

Our relationships with suppliers, advisors and contractors should be conducted to the highest standard. To support this, we should:

- always procure goods and services in a fair and consistent manner – for instance, do not share commercially sensitive information about competitors
- ensure any company or individuals working with us have read this Code of Ethics and agreed to our Supplier's Code of Conduct
- make sure payments are processed on time – this includes making sure all information is provided to procurement in a timely manner.

We comply with our legal obligations

As a water utility company, we must follow many rules and regulations. Our customers and regulators expect us to meet these – and to be able to clearly show our compliance. To achieve this, we should:

- be aware of regulatory obligations that apply to our work – this means everyone should be aware of the policies and procedures that apply to their role and comply with them
- help the business maintain those policies and procedures as regulations / guidance changes and report any issues found – don't assume somebody else will do this within the company
- deal with regulators in an open and cooperative manner, using the correct channels
- inform relevant colleagues if current activities result in non-compliance or if you're asked to do something that could breach a regulation.

Doing the right thing for each other

We care for and respect each other

We all have a part to play in creating a caring, fair and inclusive work environment in which different ideas, views and beliefs are appreciated and encouraged. Bullying, discrimination or harassment of any kind – by anyone – is unacceptable. To support this, we should:

- treat each other fairly, honestly and courteously – this includes anybody working with us
- work as one organisation – don't undermine others' work
- support others who report concerns and seek to resolve any conflicts
- lead by example and foster a positive, caring and open environment for discussion and collaboration
- remove any barriers or biases that exist in the recruitment process
- Speak Up if you see bullying, harassment or discrimination in the workplace.

We focus on health, safety and wellbeing

Every employee – regardless of role, title or responsibility – is empowered to take action to ensure anybody's safety. You should:

- take action if we see a situation that could put ourselves or others at risk
- follow the processes and procedures we have in place – these are designed to keep us all safe
- ask twice about each other's wellbeing, as someone's first answer may withhold their true feelings – remember that anybody may need support from time to time.

We use social media responsibly

Social media can be a great way to support our business and to understand and communicate with our customers and stakeholders. However, whether we are posting on behalf of Southern Water or ourselves, we must understand the implications of what we say online – and recognise that any communications can affect our reputation.

To avoid risk, people must use common sense, paying special attention to confidentiality and company loyalty.

To do this, we should:

- always consider how our posts will be interpreted by customers and stakeholders – by identifying ourselves as Southern Water employees, we are creating perceptions about our expertise and about the company
- feel free to share all relevant posts from the official Southern Water accounts – but don't set up a group, page, blog, website or network that mentions Southern Water without the prior approval of the Brand and Content team.



How to Speak Up?

The Speak Up initiative empowers you to raise concerns about suspected misconduct in a variety of ways.

You can report or discuss any suspected wrongdoing with your line manager or a trusted team member, such as your HR representative or health and safety adviser. You can also contact one of our representatives, functions or committees listed in the policy. Contact details are available on the intranet.

However, if you believe the matter can't be dealt with through the company's internal channels, you can use the external Speak Up service. It's managed by an independent third party, available 24 hours a day, 365 days a year, and is completely confidential and anonymous.

You can access it by using the below details:

secure.ethicspoint.eu/domain/media/en/gui/104053/index.html

or call **0808 234 3871** (Free of charge).

This line is confidential and independent.



Call: 0808 234 3871

This line is confidential and independent

Finally

We all have a duty to follow our Code of Ethics in everything we do

Following our Code of Ethics ensures we can all be proud of our company, the services we offer and each other. It helps us to be the best we can be.

Please make sure you refresh your knowledge of the Code of Ethics every year and are familiar with ethical decision making. Doing so will help us all to do the right thing and put this value into action every day.



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