



## Scottish Power Anti-Bribery and Corruption Rules

Scottish Power is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy sets out Scottish Power's position on preventing and prohibiting bribery and corruption in accordance with the Bribery Act 2010 ('the Act').

The Act will come into force on 1 July 2011 and will create a framework of five criminal offences:

- giving, promising, and offering of a bribe;
- agreeing to receive or accept a bribe;
- bribing a foreign official;
- failure of commercial organisations to prevent bribery; and
- a senior officer of a commercial organisation consenting to or conniving in an act of bribery.

The Act can be viewed using the following link:

<http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>

### Objective

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The Scottish Power Anti Bribery and Corruption Rules ('the Rules') sets out the key Anti- Bribery and Corruption principles which Scottish Power is committed to.

### Scope

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All Scottish Power employees, contractors and suppliers must comply with the Rules and it extends to all of our majority owned business dealings and transactions in the UK and in all countries in which Scottish Power or our subsidiaries and associates operate. The Rules extend to Scottish Power having proportionate procedures to ensure that all service providers (including contractors and suppliers) comply with Scottish Power's anti bribery and corruption policies. Where Scottish Power have a minority interest we will encourage the application of the Rules amongst our business partners including joint venture partners. It is essential that Scottish Power conduct an effective process of due diligence prior to entering into significant business relationships and that we keep a record of this process.

Any breach of the Rules is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Scottish Power.

## Anti Bribery and Corruption Rules

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Scottish Power does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world, both with public officials and people in the private sector. Ethical behaviour is in the long term interests of our company.

Scottish Power is committed to the following key Anti Bribery and Corruption principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to any foreign public official with the intention of influencing them to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee found to be in breach of these principles will face disciplinary action.
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in Scottish Power losing business.
- We will avoid doing business with others who do not commit to conducting business without bribery.
- We are committed to a programme to counter the risk of Scottish Power being involved in bribery. We will have adequate procedures in place to ensure that all employees understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

Any concerns relating to a breach of the Rules should be reported in one of the following ways:

- Your Line Manager
- Group Security Director
- Director of HR or 1HR Direct
- Head of internal Audit
- Confidential and Anonymous Whistle blowing helpline – **0800 374 199**
- [codeofconduct@scottishpower.com](mailto:codeofconduct@scottishpower.com).

## **Implementation, Monitoring and Compliance**

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Scottish Power will conduct risk assessments across its businesses on a regular basis and where relevant will identify employees or officers of Scottish Power who are in positions where they may be exposed to bribery.

Further information and training on the Act and what it means for Scottish Power will be issued to these bribery risk areas identified in the risk assessment. This training will be mandatory for those individuals identified in these risk areas.

General guidance will be cascaded through senior management and line managers and will be made available to all employees.

Internal Audit will monitor the adequacy of these Rules and associated processes and procedures on an annual basis.

The Scottish Power Anti Bribery Group will meet to monitor performance of these Rules and will prepare and submit an annual report to the Senior Responsible Officer for the Rules – **Sheila Duncan, Director of Human Resources, who has been asked to take up this role**. The Senior Responsible Officer will report on an annual basis to senior Scottish Power management and when relevant the Scottish Power Board.

## **Further information and guidance**

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These Rules set out the key principles which Scottish Power must adhere to. Further relevant information and guidance about these Rules can be found in the **UK Ministry of Justice** website:

<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>