

**ScottishPower Foundation Anti-Bribery and Corruption Policy**  
**(as approved by the Trustees on 25 March 2025)**

The ScottishPower Foundation (the “Foundation”) takes a zero-tolerance approach to bribery and corruption and is committed to the highest standards of ethical conduct and integrity in all its activities. The Foundation’s Anti Bribery and Corruption Policy (‘the Policy’) sets out the Foundation’s position on preventing and prohibiting bribery and corruption in accordance with the Bribery Act 2010 (‘the Act’).

The Act came into force on 1 July 2011 and created a statutory framework of criminal offences namely:

- Bribery - giving, promising, and offering of a bribe;
- Being bribed - agreeing to receive or accept a bribe;
- Bribery of foreign public officials;
- Failure of a commercial organisation to prevent bribery on its behalf; 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>

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### **Policy Objective**

The Policy sets out the key Anti- Bribery and Corruption principles which the Foundation is committed to.

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### **Policy Scope**

All Foundation trustees and personnel must comply with the Policy. The Policy applies such that the Foundation must have in place proportionate procedures to ensure that all projects comply with the terms of the Policy. It is essential that the Foundation conducts an effective process of due diligence prior to entering into significant business relationships and that the Foundation keeps a record of this process.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned. Such a breach could result in serious damage being done to the reputation and standing of the Foundation. This is something that the Office of the Scottish Charity Regulator (“OSCR”) takes very seriously and places a large emphasis on charity trustees playing an active role in protecting the reputation of a charity.

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### **Anti Bribery and Corruption Principles**

The Foundation does not tolerate, permit or engage in bribery, corruption, or improper payments of any kind in its activities, either with public officials or with people in the private or third sector. Ethical behaviour is in the long-term interests of the Foundation.

The Foundation is committed to the following key Anti Bribery and Corruption principles:

- We will carry out activities fairly, honestly, and openly.
- We will not give or offer any money, gift, hospitality, or other advantage to any person carrying out a business, charitable 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 advantage.

- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow personnel to accept money, gifts, hospitality, or other advantages from associates, actual or potential projects, or service providers which are intended to influence a decision or transaction (including our assessment of any applications for support from the Foundation) in some improper way.
- Where gifts or hospitality are considered to be appropriate in the circumstances, these should be recorded to ensure appropriate transparency and oversight. A central register is in place for Foundation trustees and personnel to record gifts, hospitality, and conflicts of interest.
- We will avoid working with others who do not commit to conducting business or other activities without bribery.
- We will include appropriate anti-bribery and corruption clauses within our contractual arrangements.
- We will act in a way which protects the reputation of the Foundation. We will ensure that nothing is done which could give rise to any suspicion that the conduct of the Foundation has fallen in any way below standards of best practice or the expectations of the OSCR.
- We will adhere to all applicable standards, principles, and laws for accounting and financial reporting, make and keep accurate records that reflect all the transactions of the Foundation, and maintain an adequate system of internal accounting controls.
- We are committed to a programme to counter the risk of the Foundation being involved in bribery. We will have adequate procedures in place to ensure that all personnel understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

#### **Further information and guidance**

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This policy set outs the key principles which the Foundation must adhere to. Further relevant information and guidance can be found in the following Foundation documents:

- <https://www.scottishpower.com/userfiles/file/SPF-Good-Governance-Code-11-June-2024.pdf>
- <https://www.scottishpower.com/userfiles/file/SPF-Compliance-Regulations-11-June-2024.pdf>
- <https://www.scottishpower.com/userfiles/file/SPF-Code-of-Ethics-June-2024.pdf>

#### **Reporting a Concern**

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To promote legal and regulatory compliance and the highest standards of ethical conduct, the Foundation has established an Ethics Mailbox, a confidential and transparent means of reporting:

- illegal behaviour or behaviour that is suspected of being illegal;
- unethical behaviour; or
- behaviour which contravenes the standards of conduct set out in the Foundation Good Governance Code, the Code of Ethics, or any other relevant policy.

We all have a responsibility to help prevent, detect, and report instances of bribery and corruption. If you have a concern regarding a suspected instance of bribery or corruption, or a breach of this Policy, please Speak Out. The Ethics Mailbox is accessible via the [Foundation website](#).

All Ethics Mailbox reports are managed, confidentially, by the SP Foundation Compliance Officer. Further information on the Ethics Mailbox process can be found in Section 9 of the Foundation [Compliance Regulations](#).