



# Code of Conduct and Business Ethics

The reputation and success of SES Water is dependent on the quality and the behaviour of its people at all levels throughout the organisation. This Code encapsulates the values and conduct that are important to the Board. It has been developed to provide guidance and assistance to both managers and employees in their dealings with our customers, suppliers, trade partners, stakeholders and with each other.

The Code provides a framework which formalises and strengthens the existing norms of business behaviour throughout the Company and should be read in conjunction with the Company's other relevant supporting policies and procedures.

Adherence to the principles will help ensure that our reputation and success that has been established over many years will continue to be enhanced.

**Ian Cain**  
Chief Executive Officer  
March 2024

## Our vision, purpose and values

**Our vision** is to be an outstanding water company that delivers service excellence

**Our purpose** is to harness the potential of water to enhance nature and improve lives.

**Our values** define who we are and guide our behaviour and actions as we work towards achieving our vision. We aim to demonstrate these values in everything we do. By adopting our vision, living our values and understanding our aims, we plan to make SES Water an outstanding place to work and at the forefront of our industry.

**Service** - we put our customers first and take pride in our service delivery

**Commitment** - we are passionate about our work, act responsibly and care about quality

**Innovation** - we seek to improve our business, to be forward-thinking and to embrace change

**Compassion** - we care about the effects of our actions and seek to make a positive impact on the community

**Collaboration** - we are respectful, welcome diversity and are supportive of each other to achieve our goals

**Integrity** - we are accountable, ethical and trustworthy

## Our standards of business practice

We are committed to high ethical standards in our business dealings to ensure that the integrity of our employees and our organisation is maintained. We are resolutely opposed to bribery and corruption.

**Customers** – we will listen to and learn from our customers.

We are committed to dealing with them in a responsive, respectful, fair and honest way.

We strive to deliver consistent service excellence and value for money, to be efficient and look for innovative ways of serving our customers. We will measure the levels of satisfaction with our service on a regular basis.

**Suppliers** – we aim to deal with our suppliers in accordance with the agreed terms of business. We aim to use local suppliers whenever possible. We comply with the Modern Slavery Act and

are committed to preventing slavery and human trafficking within our organisation and our supply chain.

**Political involvement** – we do not support any political party or participate in any political activity. We do not make any donations to political parties.

**Shareholders** – our shareholders take a close interest in our performance at all levels. They expect us to operate profitably, providing a reasonable return on their investment and place a very high value of ethical standards and the good reputation of the Company.

**Data Protection** – we fully comply with all the provisions of the Data Protection Act and General Data Protection Regulation.

## Our approach to being a good citizen

We are committed to being a good corporate citizen, taking into account the social, economic and environmental impacts of our business.

**Environment** - we are inextricably linked with the environment and take our guardianship of the environment seriously. We adopt a proactive approach to environmental issues - including helping to educate children and the wider community - and will carry out activities in a sustainable manner.

**Community** – we are part of Business in the Community, a national network for responsible businesses. We are fully committed to supporting the communities in which we operate through a variety of means, including our work with schools, charities, fund raising and voluntary work by employees. We conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbances as a result of our operations and to carry out our activities in a safe manner. At all times we aim to be a good neighbour. We serve local interests by providing good and equal employment opportunities and ensure that appropriate support is provided to our more vulnerable customers.



**Quality** – we are committed to providing a service that offers value in terms of price and quality.

## Our approach to corporate governance

We are committed to protecting the interests of our people, our company, our customers and our shareholders through compliance with the relevant legal and regulatory requirements and careful management of business risk.

We comply with the Combined Code on Corporate Governance applicable to all major public companies in the UK and required of all licensed water supply companies. We report annually on our corporate governance arrangements in our annual report and accounts. This also includes our review of the effectiveness of our system of internal control, which covers financial, operational, compliance and risk management processes. Each year we also publish 'Keeping it clear' a customer-friendly guide to how we are owned, run and financed. We also adhere to Ofwat's 2019 objectives with respect to Board Leadership, Transparency and Governance, with the Board and the Company conducting themselves in the highest standard that is expected of a provider of an essential public service.

It is the responsibility of management to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations that might affect the area of the business in which they are engaged. Management is also responsible both for ensuring that policies and procedures are in place to manage risks, and that the policies and procedures are complied with.

## Our commitments to our employees

We are committed to maximising both employee and business performance through employing the best people at all levels and creating an environment in which they want, and are able, to contribute to the Company's success. We aim to provide them with the appropriate training and support and will ensure that they are appropriately rewarded for their efforts and are treated fairly and with dignity and respect.

**Respect** – we expect our employees to treat their colleagues as they would like to be treated. This means treating others with dignity and respecting their individual differences and contributions. Any conduct involving discrimination or harassment (racial, sexual or of any other kind) of an employee is unacceptable.

**Equal opportunities** – we support the principle of equal opportunities and fair pay in employment and believe that it is in the Company's and employees' best interests to develop, train and nurture all people, talent and skills available when new opportunities arise and throughout employment.

**Health, safety and wellbeing** – we promote a strong safety culture based on a safe and competent workforce adopting working practices and behaviours that will not endanger our employees, contractors and members of the public. We will take all reasonably practicable steps to ensure the health, safety and wellbeing of all of our employees. We aim to ensure that all employees are properly trained and made aware of statutory and other requirements as contained in the Health & Safety at Work Act etc. 1974. All employees also have a duty to look after their health, safety and wellbeing and as a Company we proactively support this.

**Pre-employment screening** – in order to protect the interests of our employees and customers, and because of the nature of our business, we will apply nationally recognised pre-employment screening and selection techniques.

## Our employees' commitment to us

Employees must avoid situations where the appearance of business impropriety may arise, even though the circumstances might not otherwise specifically violate this Code of Conduct.

**Conflicts of interest** – every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company, or which divides their loyalty to the Company.

**Confidential information** – employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment.

**Corporate hospitality and gifts** – the Bribery Act 2010 created a new offence of offering or receiving bribes. Therefore employees should be aware that the very act of giving or accepting gifts or corporate hospitality could at some point be used against them or the Company. In certain circumstances corporate hospitality may be acceptable and in these situations prior approval will be required as detailed in the Hospitality and Corporate Gifts Policy.

**Assets and property** – all employees should treat the assets and property of the Company and its customers, suppliers and trade partners with the highest level of respect. Apart from tangible assets this would include Company and customer information as well as the name, image and reputation of the Company.

## Our suppliers' commitment to us

We expect our suppliers to maintain high ethical standards in all of their dealings with us, in order to drive improved performance and help us achieve our vision.

## Whistleblowing



Employees who wish to voice their concerns about other employees and/or service provisions which may have an impact or threaten the wider public interest should, in the first instance, call the external Whistleblowing Hotline Service operated by NAVEX Global on 0800 048 8405.

If the employee would prefer to talk directly to someone in authority, they should contact the Head of People.

Full details on the procedure can be found in the staff handbook.