



SCOTTISHPOWER
COMPLIANCE DIVISION

July 2019

Anti-Bribery and Corruption Policy



Anti-Bribery and Corruption Policy

Policy Objective

The Iberdrola Group (the “Group”) takes a zero-tolerance approach to bribery and corruption and is committed to the highest standards of ethical conduct and integrity in its business activities worldwide. These principles are established in the Group Code of Ethics and the Anti-Corruption and Anti-Fraud Policy, and are applied within Scottish Power Limited (the “Company”).

The Scottish Power Limited Board of Directors (the “Board”) and senior management team expect all employees, contractors, suppliers and third parties to fully comply with this Policy, which extends to all business dealings and transactions in the UK and in all countries in which the Company or its subsidiaries and associates operate.

The Policy is accompanied by the ScottishPower Anti-Bribery and Corruption Procedures that set out in more detail the processes and procedures to be followed to ensure compliance with this Policy.

Implementation and Monitoring

The ScottishPower Compliance Division is responsible for the day to day oversight of the Anti-Bribery and Corruption Policy. The Chief Compliance Officer is the Senior Officer Responsible for this policy who will monitor and report to the Board, the Audit and Compliance Committee and the Group Compliance Unit information regarding compliance with this policy and the overall Compliance and Ethics programme.

UK Bribery Act 2010

The UK has some of the most robust anti-bribery and corruption legislation in the world. The Bribery Act 2010 came into force on 1 July 2011 and creates 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.



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Bribery is a criminal offence and there are serious consequences for individuals and companies found to be non-compliant with the Act.

Key Anti-Bribery and Corruption Principles

ScottishPower 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.

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

- We will carry out business fairly, honestly and openly.
- 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.
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role in the UK or abroad, or to a third party associated with that person, to get them to do something improper or to improperly influence them to our business advantage.
- We do not allow facilitation or 'grease' payments under any circumstances.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- Third parties are not permitted to offer or provide any money, gift, hospitality or other advantage in order to secure benefits for themselves or The Company when carrying out business connected with ScottishPower.
- We will avoid doing business with others who do not commit to conducting business without bribery.
- We will carry out appropriate risk assessment and due diligence on third parties and maintain a record of this process. We will include appropriate anti-bribery and corruption clauses within our contractual arrangements.
- Any employee found to be in breach of these principles will face disciplinary action.
- Employees will be provided with appropriate training in this area
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in ScottishPower losing business.



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Report a Concern

The Company is committed to a programme to counter the risk of ScottishPower being involved in bribery. Any concerns relating to a breach of the Policy should be reported in one of the following ways:

- SP Chief Compliance Officer
- Business Compliance Officer
- Compliance division mailboxes :
compliancedivision@scottishpower.com
liberalised.compliance@scottishpower.com
networkscompliance@scottishpower.com
renewablescompliance@scottishpower.com
- External helpline (0800 374 199), and web reporting service (wrs.expolink.co.uk/scottishpower)
- Line manager

Further information and guidance

The following supplementary documents are available on the ScottishPower Compliance Division intranet site:

- Code of Ethics
- ScottishPower Code of Conduct and Disciplinary Rules
- ScottishPower Anti-Bribery and Corruption Procedures
- Speaking Out Guidelines

The UK Ministry of Justice website:

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

