

**SCOTTISHPOWER**

**GOVERNMENT AFFAIRS**

May 2018

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# **Political Engagement Policy**



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## Political Engagement Policy

### Policy Objective

The Political Engagement Policy (the “Policy”) regulates what Scottish Power employees must do before engaging with politicians and their advisers as part of our day to day activities. In ScottishPower responsibility for these relationships sits with the Government Affairs Team within Corporate Communications.

The Government Affairs team act as a single point of contact for parliamentarians and their advisers on a proactive and reactive basis.

Anyone contacting, engaging and meeting with parliamentarians, government ministers and their advisers must seek approval from the Government Affairs team.

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 majority owned business dealings and transactions in the UK and in all countries in which ScottishPower (the “Company”) or our subsidiaries and associates operate.

### Implementation and Monitoring

The ScottishPower Government Affairs team within Corporate Communications is responsible for the day to day oversight of the Political Engagement Policy. The Head of Government Affairs is the Senior Officer Responsible for this policy.

Information regarding engagement with politicians must be sent within 3-5 days of activity to [govaffairs@scottishpower.com](mailto:govaffairs@scottishpower.com) to ensure the Lobbying Register is updated and we remain in line with the legislation.

The pro forma included in ANNEX 1 must be completed and sent to:  
[govaffairs@scottishpower.com](mailto:govaffairs@scottishpower.com)

Failure to comply with this policy could constitute breach of the Iberdrola Code of Ethics and ScottishPower Code of Conduct and Disciplinary Rules.

The consequences for ScottishPower could be equally severe including a fine, serious reputational damage, and loss of investor confidence.



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## Political Engagement Policy

### Lobbying (Scotland) Act 2016 (the “Act”)

The Scottish Parliament passed legislation in 2016 to create a register of “regulated” lobbying, designed to improve transparency of lobbying contact between organisations and:

- Members of the Scottish Parliament (MSPs)
- Members of the Scottish Government
- The Permanent Secretary of the Scottish Government
- Scottish Government Special Advisers

There are three tiers of compliance with the Act:

- The Lobbying Registrar can issue an Information Notice to anyone reported to have been engaged in regulated lobbying where this has not been registered.
- The Commissioner for Ethical Standards in Public Life in Scotland can investigate complaints about non-compliance with the Act and submit a report to Parliament upon conclusion of an investigation. Ultimately, the Parliament could then censure the subject of the Commissioner’s report.
- Non-compliance could also result in criminal prosecution and the application of penalties.

As a result of similar schemes elsewhere in the UK this policy applies across the board, to all parliamentarians.

### Key Political Engagement Principles

ScottishPower is committed to the following key political engagement principles:

- Transparency and openness
- A consistent and coordinated approach
- Single point of contact for parliamentarians
- Good stakeholder engagement practice



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## Political Engagement Policy

- We are now required by law to keep a, publicly available, register of contact with politicians

The Government Affairs Team is responsible, at a Group level for all engagement with parliamentarians, government ministers and their advisers.

Anyone contacting, engaging and meeting with parliamentarians, government ministers and their advisers must seek approval from the Government Affairs Team as per explained in the section below. Pro forma included in ANNEX 1 must be completed and sent to:

[govaffairs@scottishpower.com](mailto:govaffairs@scottishpower.com)

On occasions of chance meetings or contact intimated by a parliamentarians, government ministers and their advisers you must alert the Government Affairs Team to advise of this contact. This includes any conversations outside the UK.

## Report a Concern

The Company is committed to a programme to counter the risk of ScottishPower being in breach of the Lobbying (Scotland) Act. Any concerns relating to a breach of the Policy should be reported to the Government Affairs team - [govaffairs@scottishpower.com](mailto:govaffairs@scottishpower.com)

## 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
- Further Information and Guidance
- The Scottish Parliament Lobbying Registrar website
- The Scottish Parliament Lobbying Code of Conduct
- The Scottish Government Ministerial Code
- The MSP Code of Conduct
- Civil servants and Special Advisers are covered by the UK Civil Service Code.
- Scottish Ministers are covered by the Scottish Ministerial Code.



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## Political Engagement Policy

### ANNEX 1:

| <b>Political engagement log</b>   |                    |
|-----------------------------------|--------------------|
| Employee name                     |                    |
| Date of engagement                |                    |
| Name of MP/MSP/AM/(Adviser)       |                    |
| Type of communication             | email/call/meeting |
| Location                          |                    |
| Description of meeting/email/call |                    |

