

# Code of Conduct

January 2025



  
Pennon

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# Our Code

# 01

# A Personal Message from our Chief Executive Officer

Thank you for taking the time to read our Code of Conduct, which sits at the heart of everything we do and believe here at Pennon.

As Pennon people, we're led by our Company Purpose, which is "bringing water to life - supporting the lives of people and places they love for generations to come". This is our guiding principle and why we are here. Our Values, **Be Rock Solid**, **Be You** and **Be the Future**, and the behaviours that underpin them, tell us how we must act. We call this The Pennon Way.

As well as living our Values, we must be clear about our responsibilities to each other, to our customers, to our communities and to the places we love. This Code of Conduct provides us with the rules for acting in a responsible way. It is meant to act as our guide for all our activities and how to decide on the right thing to do.

First and foremost, we believe in doing the right thing – Being Rock Solid. This means that we comply with laws and regulations, compete fairly, and conduct business reliably and with integrity.

The Group General Counsel and Company Secretary is responsible for this policy. It has been approved by the Pennon Group Board on the 26th September 2024 and applies across the Pennon Group ("Group").

We meet the expectations of all those who rely on us and the services we provide. We make good on our promises, and we strive to serve our customers and communities in a way which is environmentally responsible.

I passionately believe that only by being responsible and acting in The Pennon Way, can we create sustainable value for our customers, colleagues, shareholders and communities. Regardless of which part of Pennon Group we work in, each of us can make a vital contribution to this effort. I am equally passionate about promoting and supporting responsible leadership, creating a space where everyone can be themselves and belong, and where colleagues are encouraged to be curious and drive progress. As you read through the Code you will see that this is a central part of our mission to make Pennon the best place to work.

We will celebrate colleagues who do the right thing, which is not always the easiest thing. This includes anyone who raises a legitimate concern about any issue. I therefore ask each of you, as a valued colleague, to remind yourself of the principles set out here, and

to act ethically and responsibly together to win as one team. Together, I truly believe that we can make real and positive difference for all our customers, each other, shareholders and communities and the places they love.

The Board and I have fully endorsed this Code of Conduct, and we commit to live our Values and the guidance it contains with you all, as we strive to make Pennon a great place to work for everyone.

**Thank you.**



**Susan Davy**  
Group Chief Executive Officer

# Our Values

Our corporate values are the guiding concepts that shape our culture, behaviours, and decision-making.

They align actions with our vision and strategic objectives, creating a framework for how colleagues should engage with one another, customers, and stakeholders. These principles provide clear direction and expectations, distinguishing us from the rest of the industry.

Our values go beyond words on a poster; they are embedded in daily actions and consistently demonstrated by our teams across the Group. Developed with input from colleague representative groups and listening groups, these values represent a significant shift in delivering our strategic priorities and serve as a unifying thread throughout our organisation and reflected in this Code of Conduct..

For more information on the Pennon 'Values', visit the Hub, or click [here](#).

## Be **ROCK SOLID**

- ✔ We want you to be the one we all look up to.
- ✔ Be trusted.
- ✔ Act with integrity and make good on your promises.
- ✔ Build trust, one relationship at a time.
- ✔ **Be rock solid.**

## Be **YOU**

- ✔ We want you to bring your best every day.
- ✔ Be open and inclusive, work together and win as one team.
- ✔ Let your passion inspire those around you.
- ✔ Be authentic, make your mark and **be you.**

## Be the **FUTURE**

- ✔ We encourage you to be curious and challenge convention.
- ✔ Share ideas with confidence and purpose and help share our future.
- ✔ Embrace change. Drive progress.
- ✔ Own the challenge.
- ✔ **Be the future.**



# How the Code Works

## Why the Code is Important?

Our Code of Conduct guides the actions we take everyday. It helps us decide what to do in difficult situations, how to raise concerns, but most importantly reminds us to act ethically and with integrity.

In each section of the Code you'll find references to the relevant policies and guidance which can be found on 'the Hub'.

## Who does the Code apply to?

The Code of Conduct applies to all Pennon Group permanent and temporary employees, regardless of our role.

In addition, we expect that all Suppliers and Contractors comply with both the principles set out here and in the [Code of Conduct for Suppliers and Contractors](#).

## Breaches of the Code?

If any of us are found to be in breach of this Code then disciplinary action may be taken. This could include termination of employment and the company may also report the matter to the appropriate authorities.

**As a Pennon employee ...**

- ✓ I will comply with the laws, regulations, and policies within that are set by Pennon.
- ✓ I will follow this Code of Conduct and will act in line with the Pennon Values.
- ✓ I will treat people with dignity and respect.
- ✓ I will promptly report instances of presumed or actual breaches or misconducts raised within this Code, either to the Legal Compliance team or to Speak Up.
- ✓ I will seek to promote equality of opportunity, diversity, respect, and inclusion and seek to eliminate unfair or unlawful discrimination throughout our business.



# How to Raise Concerns

If you become aware of any actual or suspected wrongdoing at work (whether in the past, occurring or likely to happen) you should **Speak Up**.

You have several options to raise your concerns, and you can use the one you are the most comfortable with.

We will follow up any concerns raised to ensure that investigations are conducted properly and that you are protected from any form of retaliation. You are not expected to substantiate your allegation and are encouraged to raise any suspicions of wrongdoing.

## Personal Grievance:

If your concern relates to a personal grievance, this should be reported to the Employee Relations Team at [employeerelations@southwestwater.co.uk](mailto:employeerelations@southwestwater.co.uk) or call us on [01392 443838](tel:01392443838) with your query in the first instance. Alternatively, raise your concern with your respective HR department.

This includes formal complaints or issues raised by employees regarding their work conditions, treatment, or contractual rights within the organisation.

If your concern relates to anything else, it should be raised through our whistleblowing programme '[Speak Up](#)'. Details of this are on the next page.



# Speak Up

At Pennon we conduct our business ethically and act with integrity in our daily work.

This means that we observe all laws that govern our business, including internal policies, rules and procedures. When you notice that your colleagues aren't acting with the best interests of Pennon in mind, this is when we want you to Speak Up.

When your concern relates to suspicion of serious wrongdoing or illegal activity, you should report this through Speak Up, our independent, anonymous and confidential whistleblowing helpline.

We will ensure that investigations are conducted thoroughly and that you are protected from any negative treatment or unfair dismissal.

**Q:** *How can I raise a compliance or ethical concern? Would I be protected if I reported any violations of law or rules? I work in a small team and whenever I have raised concerns in the past, I have been told 'this is how it has always been done'.*

**A:** *You can raise any concerns through Speak Up, which are handled completely confidentially through an independent third party. Please be reassured that everything reported will be treated in the utmost confidence and all whistleblowers have legal protection from reprisals.*

*All Speak Up incidents are directly reported to the Pennon Ethics Management Committee.*

You can report any concerns on Speak Up by either:

- > Going to Speak Up at [www.pennongroup.ethicspoint.com](http://www.pennongroup.ethicspoint.com) or call 0808 196 5852
- > Using our Speak Up QR code on site, as seen below




For further information on the Whistleblowing procedure, please see the [Whistleblowing Policy](#).







  
**Pennon**  
Water Services

# Our Approach **02**

# Our Approach

Our approach guides us to behave ethically. This approach is designed to guide each of us to act as good corporate citizens.

## Our Business Conduct

Financial Crime

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Conflicts of Interest

---

Integrity of Business Records

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Competition



## Our Workplace

Respect for Each Other

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Using Company Property

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Safeguarding Information

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Cyber Security

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Modern Slavery



## Our Safety and the Environment

Health, Safety, and Wellbeing

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The Environment

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Our Communities



## Our Partners

Customers

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Suppliers and Contractors

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Regulators



# Financial Crime

We do not tolerate bribery, corruption or the facilitation of tax evasion in any form. We're committed to preventing any type of fraud or financial crime.

## Meaning:

- ✔ We do not offer or accept anything to influence someone in order to obtain a business benefit.
- ✔ A bribe does not need to be successful to be viewed as illegal.
- ✔ We take all reasonable measures to prevent fraud.
- ✔ We do not facilitate tax evasion in any form deliberately or through omission.
- ✔ We make sure that any Gift or Hospitality given or accepted is within the limits of the Gifts and Hospitality Policy.
- ✔ We maintain our Gifts and Hospitality Register accurately.

**Q:** *I've been told that if there are any delays I should bung the guy on the gate £20 and expense it, is this really okay?*

**A:** *Although £20 is a small amount, paying it to jump the queue is termed a facilitation payment and is illegal. You should notify your manager, or if you would rather report it anonymously you can use Speak Up.*

## Red Flags:

- ⚠ Are you being asked to make up-front payments or loans?
- ⚠ Are you being asked to make payments in cash, cheque, or another non-standard type of payment?
- ⚠ Are you being asked to make unscheduled 'urgent' payments?
- ⚠ Are new suppliers reluctant to provide their details?
- ⚠ Is there evidence of excessive spending by an employee or colleague, for example within expense claims?
- ⚠ Are you being pressured to avoid following normal payment protocol?
- ⚠ Have you received a photocopy of a document when you were expecting to receive an original?

## Relevant Policies:

- > [Anti-Financial Crime Policy](#)
- > [Gifts and Hospitality Policy](#)
- > [Whistleblowing Policy](#)




All Gifts and Hospitality must be requested and approved [here](#).




# Conflicts of Interest

We declare all conflicts of interest to ensure we make objective decisions.


## Meaning:

-  We may face a conflict of interest where our professional duties as a Pennon employee conflict with our personal interests.


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-  We avoid situations where our personal knowledge or connections place us in a position that could compromise or influence our decisions.

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-  We declare all conflicts or potential conflicts using the Conflict of Interest disclosure form.


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-  We do not use confidential information to gain from buying or selling Pennon shares.


**Q:** *I have been asked to sit in on a recruitment interview at short notice and the candidate is my friend. What should I do?*

**A:** *You should let HR and the interview owner know immediately that you may have a conflict of interest, reporting this to the Conflict of Interest disclosure form. Even if finding a replacement is difficult at short notice it is important that the conflict is declared.*


### Red Flags:

-  Do you have a shareholding or financial interest in another business that is tendering work with the Group?


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-  Is a family member or close friend applying for a role with Pennon?

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-  Is a close relative working for a customer or supplier?

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-  Are you aware of someone intentionally withholding a conflict of interest?

### Relevant Policies:

- > [Whistleblowing Policy](#)
- > [Inside Information and Disclosure Policy](#)



If you have a Conflict of Interest you will need to disclose this by filling out the disclosure form, [here](#).

# Integrity of Business Records

We record all business transactions accurately and with integrity to help protect against fraud.

## Meaning:

- ✔ We maintain accurate records of all our business dealings.
- ✔ We maintain appropriate financial controls.
- ✔ We report suspected irregularities in financial transactions to a manager.
- ✔ We submit accurate and honest information in our expense reports, time sheets and other business administration records.

**Q:** *My colleague often returns late from lunch but charges this time as time worked on a project. They said that it is okay as they frequently work extra hours that do not get charged. Is this acceptable?*

**A:** *It is imperative that all time sheets give a true and accurate reflection of the time spent working on a project. You should raise the matter confidentially with the appropriate manager so that they can decide how best to handle the situation.*

*If you do not feel comfortable raising it in this way and would like to do it anonymously then you can use our whistleblowing platform Speak Up.*

## Red Flags:

- ⚠ Are you aware of any colleagues who are falsifying their timesheets?
- ⚠ Is the data that you are giving out to a third party sufficiently verified?
- ⚠ Is a new customer or supplier reluctant to provide their details, or is verification of their details difficult?
- ⚠ Is the size or frequency of transactions abnormal for the customer?

## Relevant Policies:

- > [Anti-Financial Crime Policy](#)
- > [Data Retention Policy](#)
- > [Information Security Policy](#)



# Competition

We are committed to competing fairly in our markets and complying with all relevant laws and regulations.

## Meaning:

- ✔ We do not discuss pricing, bids, market segmentation or other commercially sensitive information with our competitors. Any discussion with competitors should be treated with caution.
- ✔ We follow the company's guidelines about interacting with competitors and obtaining and handling competitor information, keeping records of interactions where necessary.
- ✔ We do not enter into agreements with competitors that put us or them at an unfair advantage
- ✔ We stop contact with competitors if interactions are, or may appear to be, anti-competitive.
- ✔ We do not abuse our position of authority to display anti-competitive behaviour.

**Q:** *I overheard a colleague discussing bid pricing with a competitor, what should I do?*

**A:** *Your colleague may not have been acting with any wrong intention, but regardless of this they should not discuss confidential pricing information with a competitor. You should report what you have heard to your manager or legal representative.*

*Remember, if you prefer to remain anonymous you can use our whistleblowing procedure, [Speak Up](#).*

## Red Flags:

- ⚠ Have you or a colleague given confidential prices to a competitor company?
- ⚠ Have you been made aware of anyone giving a competitor company information about potential investments or business plans?
- ⚠ Have you seen fixed prices being agreed with a competitor?
- ⚠ Has Pennon agreed with competitors on which tenders that they are going to bid on?

## Relevant Policies:

> [Whistleblowing Policy](#)



If you suspect an instance of anti-competitive behaviour, please report this through our whistleblowing procedure, [Speak Up](#).



# Respect for Each Other

We treat each other with respect and without prejudice. We value diversity and strength it brings us.

## Meaning:

- ✔ We don't tolerate any form of discrimination, bullying, or harassment.
- ✔ We recruit and promote on merit, using a transparent performance review process and provide everyone with the same development opportunities.
- ✔ We value our colleagues' opinions, listen to what they have to say and seek feedback from them to develop as individuals and improve how we work.
- ✔ We respect Human Rights throughout our operations.
- ✔ We will not tolerate Modern Slavery in our own organisation or supply chains.
- ✔ We support and encourage our people to achieve the right balance between their work and personal life.

**Q:** *A colleague keeps making jokes that everyone else laughs at, but they make me feel uncomfortable, what should I do?*

**A:** *Raise the issue with your colleague, or if not comfortable, with your manager.*

*If you're not completely satisfied with the response and action taken, you should escalate the issue to your HR business partner.*

## Red Flags:

- ⚠ Have you witnessed any acts of deliberate discrimination, harassment or bullying of any kind?
- ⚠ Have you noticed any colleagues acting differently?
- ⚠ Do you feel that a colleague has been provided with an opportunity that you have not, due to a discriminatory factor?
- ⚠ Have you noticed a colleague being talked over repeatedly, or their opinions and ideas ignored?
- ⚠ Are you concerned about a potential occurrence of Modern Slavery in any part of Pennon or its subsidiaries?

## Relevant Policies:

- > [Diversity, Respect and Inclusion Policy](#)
- > [Whistleblowing Policy](#)
- > [Anti-Modern Slavery and Human Rights Policy](#)



If you suspect an occurrence of discrimination, harassment or bullying, please report this through our whistleblowing procedure, [Speak Up](#).

# Using Company Property

We protect company property and use it responsibly.

## Meaning:

- ✔ We protect the company's property and ensure that all intellectual property is respected and protected.
- ✔ Company Property is anything owned by the company and includes physical and intellectual property, funds, facilities, equipment such as tools, computers and phones, and IT systems such as email, MS Teams and SharePoint.
- ✔ We use company assets appropriately and do not use them to access, copy, or transmit any information or data considered to be offensive, obscene or inappropriate

## Red Flags:

- ⚠ Have you noticed any files or equipment going missing from the workplace?
- ⚠ Are you aware of a colleague using company property for unauthorised personal use?

**Q:** *I sometimes take my company tools home with me for my home improvements during the weekend. Is this okay?*

**A:** *Company tools are designed to be used for company activities and not for personal use. You may not remove them from company facilities without prior approval from your manager.*



# Safeguarding Information

We treat personal, company and third-party data confidentially.

## Meaning:

- ✔ We ensure that all confidential Personal and Commercial Data (“Data”) is kept securely and protected in accordance with our data protection and company policies, maintaining the confidentiality of our employees’, customers’ and suppliers’ information.
- ✔ We treat all Data that we use as if it were our own data.
- ✔ We ensure that any third-party data sharing/ information requests and enquiries are channelled through the appropriate teams.
- ✔ We use social media responsibly, exercising good judgement. Whilst it is fine to state that you work at Pennon on social media, you should not insinuate that your personal opinions and statements represent those of the company.
- ✔ We only use the Company held Data for the purpose for which it is collected; we must never use it for personal use.

**Q:** I found a print out of our department salary information left on the printer, what should I do?

**A:** As the data is personal and confidential, you should try and avoid looking at it. You should inform your manager of what’s happened and pass them the document or dispose of it in a confidential way. Any information that you’ve seen by accident must be kept strictly confidential and not be shared with anyone else.

## Red Flags:

- ⚠ Are you aware of Data being sent via email or other means without relevant data protection considerations or security precautions?
- ⚠ Would you be embarrassed with your emails (or any other written correspondence) being seen by the Company, you or others if they were disclosed, seen or published to the public or a third party if requested?
- ⚠ Are you aware of someone searching, reviewing, or using Data held by the Company for a different purpose than specified?
- ⚠ Are you aware of Data that has been retained for longer than is needed?
- ⚠ Is someone in the business leaving documents containing Data laying around overnight and unsecured, or saving Data where unauthorised individuals have access?

## Relevant Policies:

- > [Data Protection Policy](#)
- > [Personal Data Breach Management Policy](#)
- > [Individual’s Rights Policy](#)
- > [Data Retention Policy](#)
- > [Information Classification Policy](#)



If you have any further concerns, please reach out to the [dataprotection@pennon-group.co.uk](mailto:dataprotection@pennon-group.co.uk)



# Cyber Security

Information security protects our information assets from all threats, whether internal or external, deliberate, or accidental. This ensures business continuity, protection of customers and other personal data, and prevents business damage.

## Meaning:

- ✔ Pennon Group's information assets will be protected from loss of Confidentiality, Integrity, and Availability.
- ✔ Information security is everybody's responsibility.
- ✔ We report all breaches of information security, actual or suspected, to the Information Security Team.
- ✔ We comply with all legislative and regulatory requirements, using company systems in a way that is lawful and ethical.
- ✔ We exercise care and common sense in your use of Pennon Group IT, when in doubt ask the IT Service Desk or the Information Security Team for guidance.

**Q:** *I have received an email from an unknown sender that looks suspicious and contains links? Should I just delete it?*

**A:** *Do not open the attachment or click any links. Report the email to Information Security by using the 'Report Phish' button in the top-right hand corner of your outlook. Alternatively, you can email at [Phishing@pennon-group.co.uk](mailto:Phishing@pennon-group.co.uk), they will investigate it and let you know if it's a genuine email or a phishing email.*

## Red Flags:

- ⚠ Have you received an email requesting sensitive information or containing suspicious links or attachments?
- ⚠ Are unknown or unauthorised person(s) attempting to access secure areas or 'tailgating' behind you as you enter the building?
- ⚠ Are you using another Individuals user ID and password with or without their permission to access Pennon Group IT?
- ⚠ Has any sensitive information been shared outside the company, sent to personal email accounts, or removed from the company without authorisation from a senior manager or Information Security?
- ⚠ Are computers being left unattended in an unlocked state?
- ⚠ Are you accessing information that you know you shouldn't be or even have access to?

## Relevant Policies:

- > [Information Security Policy](#)
- > [Acceptable Usage](#)
- > [Removable Media](#)
- > [Email Usage](#)
- > [Remote Access](#)



For more information see the Information Security hub [here](#).

If you believe your IT credentials have been compromised, please contact the IT service desk immediately. For PWS employees, please contact the PWS IT team and raise a PWS Support Request [here](#), choosing the category "Cyber Security".

If you believe you have received a phishing email, please click 'Report Phish' in the top-right hand corner of your outlook.

# Modern Slavery

## What is Modern Slavery?

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, including forced and compulsory labour and human trafficking. It deprives a person of their liberty for personal or commercial gain.

Pennon is committed to mitigating the risk of Modern Slavery within our business and supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships.

## Where can I find more information?

For more information on the Pennon's approach to Anti- Modern Slavery, please see our 'Anti- Modern Slavery and Human Rights Policy' [here](#).

Pennon's Modern Slavery Statement can be found [here](#).

## What Should I do if I Suspect an Occurrence of Modern Slavery?

If you suspect that there is an occurrence of Modern Slavery, you should not attempt to deal with this yourself, as this could make the situation worse for the victim(s) or put the victim(s) and or yourself at risk of harm.

Instead, you should make a confidential report via [Speak Up](#). If you are unsure about whether you have witnessed or are aware of an occurrence of modern slavery, it should still be raised through any of the above channels.



# Health, Safety and Wellbeing

We provide a safe place to work where the health and wellbeing of our employees comes first. We ensure we all get HomeSafe.

## Meaning:

- ✔ Pennon implements robust health and safety management systems, adopting best practice and engaging in continuous performance improvement.
- ✔ We all take responsibility for the health and safety of ourselves and others.
- ✔ We only undertake work that we are trained for, competent in and authorised to do.
- ✔ We take our HomeSafe Values seriously and we all have the authority to stop work at any time if health or safety is being compromised.

**Q:** *We've had an equipment breakdown in one of our facilities and my supervisor has asked me to undertake a quick repair and not to worry about isolating the equipment or completing a risk assessment. I know I shouldn't do this, but I feel pressured to do as I'm asked.*

**A:** *Working on equipment that has not been isolated and without a risk assessment presents a health and safety risk. You should raise the issue with your supervisor, who should assess other options to make the repair safely.*

*If you're uncomfortable speaking directly to your supervisor, you should speak with either your HR business partner or the Health and Safety representative for the facility.*

## Red Flags:

- ⚠ Have you noticed a colleague ignoring a HomeSafe value?
- ⚠ Are you aware of safety devices being overridden or equipment provided being abused?
- ⚠ Could the work you are undertaking put anyone in danger?
- ⚠ Have you seen colleagues using equipment for which they are not trained, or entering areas where they are not permitted?
- ⚠ Have you seen work being started without the necessary training, permit to work, or PPE?

## Relevant Policies:

- > [Health, Safety, and Security Policy](#)
- > [Workplace Policy](#)
- > [Health and Safety Standards for Contractors and Suppliers Working on SWW Sites](#)



# The Environment

We act responsibly towards the environment, minimising our impact and working for a sustainable future.

## Meaning:

- ✔ We measure our environmental impact with respect to all natural resources, focusing on energy and water.
- ✔ We set targets to continually reduce the resources we need to run our business.
- ✔ We manage our resources and the disposal of our waste responsibly. We control our emissions and help others to do the same.
- ✔ We actively reduce vehicle emissions from our cars, vans and lorries.
- ✔ We work with customers and consumers to encourage the proper disposal of dangerous and hazardous waste.

**Q:** I've noticed oil and other materials being washed down an open drain by one of my colleagues. Should I say anything?

**A:** Hazardous materials disposed of down drains may cause pollution. You should speak with your colleague about the potential consequences of their actions and remedy the situation.

If you're uncomfortable speaking directly, you should report it to your manager, Speak Up, or your Health and Safety representative or advisor.

## Red Flags:

- ⚠ Are you aware of operations being conducted that contradict the standards required by our regulators?
- ⚠ Is a colleague misreporting our environmental performance?
- ⚠ Have you seen any invasive non-native species (INNS), such as Japanese knotweed, Zebra mussels or American signal crayfish, which could impact on creating a good water supply?
- ⚠ If your area of operation has significant biodiversity, are you aware of the Biodiversity Management Plan?
- ⚠ Does your office have appropriate recycling facilities?

## Relevant Policies:

- > [Environmental Policy](#)
- > [Biodiversity Policy](#)
- > [Water Management Policy](#)







# Our Communities

We respect the communities that we work in and endeavour to create a positive impact for the people who live in them.


## Meaning:

-  We listen to the people living in our communities and respond to their concerns.


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-  We consider the impact we have on the local communities where we work and take steps to minimise any disruption or inconvenience.

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-  We encourage our people to contribute to local communities through our charity partners and volunteering activities.


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-  We support local initiatives to improve public facilities, such as our beach cleaning activities and butterfly meadows.


**Q:** *A member of the local community keeps complaining about the noise from our site, should I just ignore them?*

**A:** *You should log every complaint, even if it has been logged previously. Every complaint is followed up through our Complaints Procedure, and if not resolved, go to senior management. We can see when there are repeated complaints, allowing us to address issues in an area more quickly.*


**Red Flags:**

-  Has an issue been brought to your attention by the local community and been ignored by your colleagues?


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-  Has a new scheme or activity failed to take into consideration the impact this could have on the local community?

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-  Is it difficult to see where the Pennon investment in the local community has been made?

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-  Has your request to take a volunteer day been denied?

**Relevant Policies:**

- > [Community Relations and Investment Policy](#)
- > [Water Management Policy](#)



# Customers

Our customers are at the heart of our business, we seek to provide excellent service, to keep our customers safe and to offer value for money.

## Meaning:

- ✔ We deliver our products and services to meet our customers' needs.
- ✔ We respond promptly and openly to any concerns raised.
- ✔ We listen to our customers and strive to continuously improve our products and services based on their feedback.
- ✔ Our customers are at the heart of what we do.

**Q:** *I accidentally overcharged my customer, but they didn't notice, can I just keep quiet?*

**A:** *No one likes admitting to getting something wrong, but we shouldn't overcharge a customer when we know that we've made a mistake.*

*You should get advice from your manager on how best to handle the situation, no one will penalise you for admitting to a mistake and taking appropriate action to sort it out.*

## Red Flags:

- ⚠ Are there repeated customer complaints that could indicate a deeper issue?
- ⚠ Are you aware of consistent delays in responses made to customers?
- ⚠ Does a customer question or request fall in within the Environmental Information Regulations and should be passed to the EIR team at [eirenquiries@pennon-group.co.uk](mailto:eirenquiries@pennon-group.co.uk)?
- ⚠ Are you aware of a customer's personal data being recorded inaccurately or used for a different purpose than stated to the customer?

## Relevant Policies:

- > [Privacy Policy](#)
- > [Personal Data Breach Management Policy](#)



# Suppliers and Contractors

We're transparent in all our dealings with suppliers and contractors, respecting their interests and asking for their commitment to equivalent standards and practices.

## Meaning:

- ✔ We use transparent processes to select our suppliers and contractors and respect the terms of our contracts with them.
- ✔ All our Suppliers and Contractors adhere to the standards set out in this Code of Conduct, our Health, Safety, Community and Sustainability Policies and our Code of Conduct for Supply Chain Partners.
- ✔ We ensure that all suppliers and contractors comply with our Supplier onboarding processes.
- ✔ We encourage suppliers, contractors and organisations in our wider supply chain to protect human rights and promote good working conditions.
- ✔ We seek to procure fairly traded products where available.

**Q:** *I am working on a project with tight budgetary constraints. To complete the project within the targeted costs, I want to ask our supplier to provide me with an exceptional discount on this project order on the understanding that I will 'make it up to them' in future orders, is this okay?*

**A:** *Inducement in any form, including future business to the supplier, could compromise your ability to act in line with our transparent procurement processes and in the best interests of the Company. This behaviour should be avoided.*

## Red Flags:

- ⚠ Have you seen any behaviour that could indicate the presence of modern slavery within our supply chain?
- ⚠ Are you aware of any suppliers or contractors who are demonstrating anti-competitive behaviour?
- ⚠ Are you aware of any Pennon employees avoiding standard onboarding practices with new suppliers or contractors?

## Relevant Policies:

> [Anti-Modern Slavery and Human Rights Policy](#)

If you are part of the Pennon Supply Chain, please refer to the [Code of Conduct for Supply Chain Partners](#) for greater detail on our expectations.

If you have any concerns that a Supplier or Contractor is not behaving in line with this Code or the Code of Conduct for Supply Chain Partners, please contact [Speak Up](#).



# Regulators

We work collaboratively with our regulators to ensure that the interests of our customers are upheld.

## Meaning:

- ✔ We work actively with our regulators to ensure that we understand their requirements and meet their expectations.
- ✔ We listen and respond to our regulators in a timely manner.
- ✔ We report as required to our regulators, meeting the timescales and requirements.

**Q:** *The regulator has asked for our customer complaint statistics, the period wanted is unclear, can I give them the best ones?*

**A:** *We want to report to the regulator in an open and transparent manner. You should clarify exactly what it is the regulator wants and report the statistics accordingly.*

## Red Flags:

- ⚠ Are you aware of a colleague or site that is not complying with the licence obligations set by our Regulators?
- ⚠ Have the procedures and practices set by our Regulators been incorrectly implemented?







# Contact

# 03

# Where Can I Find More Information?

- ✔ Our Pennon Policies can be found [here](#).
- ✔ Legal Compliance Policies can be found [here](#), and Data Protection policies can be found [here](#).
- ✔ Further detail can also be found within the training modules on LMS365. These can be found on 'The Hub' or by clicking [here](#).
- ✔ If you have any questions or queries, please talk to your Line Manager in the first instance.
- ✔ For further questions, please contact the Legal Compliance: [LegalCompliance@Pennon-group.co.uk](mailto:LegalCompliance@Pennon-group.co.uk)





