

EDF in the UK promotes and endorses high standards of ethical behaviour and business practice, underpinned by a culture of openness, integrity and accountability, believing that this approach benefits the Company, its customers, its employees, its shareholders and society at large. All employees are expected to behave in a manner that protects the interests of the Company, their colleagues and the environment. This policy sets out our minimum standards for upholding ethical business practices.

Policy Standards:

Each Business Unit/Central Function (entity) is responsible for the effective deployment of this policy in their area. Key minimum requirements are:

1. A Code of Conduct for Employees and other Company-wide documents set out the required standards of behaviour from employees and these are appropriately deployed. These include practices, procedures and guidance defining our commitment to prevent, discourage and deal with unlawful discrimination, bullying or harassment including behaviour designed to exclude an individual, or violence in the workplace.
2. EDF in the UK has zero tolerance towards acts of Fraud or Bribery, money laundering or behaviour that breaches Competition law. Our Anti-Fraud and Anti-Bribery framework, Gifts and Hospitality procedure and Competition Manual are deployed and managed in all entities, and controls to prevent money laundering and breaches of EU Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) or European Market Infrastructure Regulation (EMIR) are deployed in entities where these risks apply.
3. Ethics and Business Conduct risks and duty of vigilance (human rights, health and safety and environment) risks are actively identified, assessed and managed. Top fraud and corruption risks are mapped and validated by the Executive Team.
4. Entities deploy appropriate controls to make sure that our expected standards of behaviour and Ethics and Business Conduct obligations are maintained. These include requiring employees to declare conflicts of interest and deploying training on Ethics and Business Conduct to senior leaders and to employees in roles identified as most exposed to the risk of bribery or corruption.
5. Appropriate checks are undertaken to ensure that EDF in the UK does not enter into relationships with sanctioned individuals or entities and that the integrity of third parties who wish to do business with EDF in the UK meets our expected standards prior to commencement of the relationship and on an ongoing basis.
6. EDF in the UK encourages employees to report any serious concerns they have about activities within the Company through their manager, senior leadership team member or the Confidential Reporting of Serious Concerns Procedure and Safecall, anonymously if they wish.
7. Monitoring and assurance is undertaken to ensure that Ethics and Business Conduct controls are effective and appropriate. Breaches and potential breaches of ethical standards are appropriately investigated.

Implementation of this policy is through line management, who are responsible for ensuring that the policy standards are appropriately applied. All EDF in the UK employees are required at all times to act honestly and with integrity to safeguard the revenue, assets and reputation of the Company. This includes:

- Behaving in accordance with the EDF in the UK Code of Conduct.
- Complying with all applicable legislation and regulation.
- Reporting any serious concerns that they have about company activities.

This Policy is aligned to EDF Group requirements and is assured through the EDF Group Internal Control Self-Assessment. I know I can count on the commitment, responsiveness and support of every one of you, in all circumstances, to meet our ethical responsibilities.



Simone Rossi, Chief Executive Officer
For and on behalf of the EDF Executive Team