

OUR CODE OF CONDUCT



Our Code of Conduct

This is our Code of Conduct. It defines what we expect of ourselves, as a minimum, to uphold the **OVO Values** in how we conduct our business activities, treat each other and our external stakeholders.

Our Code is for all colleagues across the OVO group of companies. Whatever your role at OVO, please read this guide and apply it to your everyday actions and behaviours. Every one of us has a personal responsibility to do the right thing. If we all do, OVO will remain an organisation we can all be proud of.

This Code forms part of our commitment to being a sustainable, ethical and responsible business. It was refreshed in 2021 and communicated to all of our people. From 2021, getting to know our Code of Conduct will be part of the learning journey for all new hires who join OVO. We will review our Code periodically to ensure that it remains relevant to our business.

This Code is accessible to all OVO people on the OVO intranet, and a copy is published on OVO Group's website. If you have any concerns or questions about this document, please contact the Sustainability team at sustainability@ovoenergy.com



Your responsibility as someone who works at OVO

This Code is designed to guide every day decisions. But it can't cover every eventuality - so we ask everyone to use their good judgement and common sense in applying it. In case of doubt, ask yourself:

Ask yourself	If yes, STOP	Then consult an expert	
Is it against the law or could it breach any of our regulatory obligations?		Contact Legal or Risk & Compliance	
Would you be embarrassed doing it if the customer was in the room?		Contact People Operations to identify the relevant expert team	
Could it cause harm to people or the environment?		Contact Sustainability or Health & Safety	
Would you be embarrassed if your decision was published in the media?		Contact People Operations to identify the relevant expert team	
Does it break any of OVO's policies?		Speak to your line manager, and consult the relevant expert team for guidance on what to do	Contact the team listed as the owner on the policy
Would you feel uncomfortable explaining why you've made this decision to your friends or family?			Contact People Operations to identify the relevant expert team



What to do if you see potentially unethical behaviour

If you witness behaviours that are at odds with our Code of Conduct, please speak out, without fear of consequence.

You can:

- Speak to the person involved, particularly if you can prevent immediate harm
- Speak to your line manager who can provide guidance or escalate your concern
- Speak out in confidence through our independent Speak Out service
- Provide feedback through Peakon, our regular employee survey

We're only human - and we won't always get it right. But when we get it wrong, we take responsibility for our actions and learn from our mistakes. If you are found to have deliberately or repeatedly breached our Code of Conduct, you may face disciplinary action.



To find out more, please read our Speak Out policy

How we treat each other

Doing the right thing starts with each of us as individuals and how we treat each other. At OVO, we commit to respecting and caring for each other.



1. Respect each other

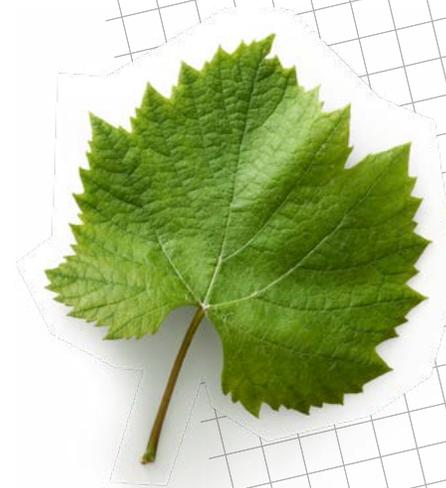
We celebrate our differences and treat everyone with respect

We promote and work to create Belonging at OVO (our approach to ensuring inclusion, diversity and equal opportunity), and we work to eliminate discrimination. We're a diverse and innovative organisation made up of many different individuals and it's our collective efforts and our different perspectives that lead us to success.

2. Care for each other

We show that we care for and support each others' wellbeing

Our people are our greatest asset: we can't achieve everything we want to without having the best people working for us. We do our best to support our people's financial, physical, social, spiritual and emotional wellbeing. We provide working conditions that will keep our workforce safe, healthy, engaged and thriving in their careers. As colleagues, we look after each other. We believe in the power of the collective, so we are committed to freedom of association. We reward our people fairly through remuneration and support their careers through appropriate skills development and training.



How we treat our stakeholders

Our stakeholders include our people, our customers, our communities, our suppliers, and our partners. We recognise we have a responsibility to do what's right towards all of our stakeholders.



3. Care for our customers

We show our customers the same level of respect that we wish to receive ourselves

Our customers are at the centre of everything we do at OVO. We treat them with courtesy, care and honesty. When things go wrong, as they sometimes do, we aim to resolve any problems fairly and quickly. We respect and safeguard our customers' privacy. We keep their data safe, secure and only share it when there is a need to. We provide our customers with products and services that offer competitive value.

4. Protect human rights

OVO has a zero tolerance approach to all types of modern slavery and human rights abuse within our business and supply chains

We support and respect the protection of labour and human rights. We strive to eradicate the risk of any abuse of labour or human rights in our own operations and in our supply chain. We do not use or condone any form of forced, compulsory, trafficked or child labour.

5. Voice our opinions with respect

We speak up on subjects that matter to us - but always with respect

We understand that our words have consequences, that they impact others, so we recognise our responsibility to be mindful in what we say and how we say it. This includes what we communicate as individual representatives of OVO and as a business, through all our channels. We use our influence wisely, with transparency and integrity in our advocacy work with industry organisations, regulators, policy-makers or others that work alongside us making the energy system better for everyone.

6. Protect the environment

We conduct our business in a way that protects the health of our planet

Working to create a net zero carbon society is at the heart of our business model. We walk the talk ourselves, by acting in a way that will drive our own emissions to net zero, safeguard natural resources and improve our impact on the environment. We strive to improve our environmental performance over time - reducing negative impacts and maximising positive impacts on the environment. We are committed to improving our business performance and operating in a way that has a positive impact in society in support of the UN Sustainable Development Goals.



How we conduct our business

We make decisions that shape our business every day.
When making them, we commit to doing the right thing.



7. Act responsibly and ethically

We each take personal responsibility for acting responsibly and ethically in everything we do

Everyone at OVO has a personal responsibility to behave ethically and ensure that all of our business activities are carried out with integrity. We promote responsible business practices within our own operations and those of our business partners. This means that we compete fairly, respect confidentiality and refuse to use or pass on insider information. We honour our contractual commitments and treat others as we would like to be treated. We expect honesty and transparency from everyone, so that we can support each other to avoid impropriety and build trust in our business.

8. Never engage with bribery or corruption

We never engage in bribery or corrupt practices, and we avoid conflicts of interest

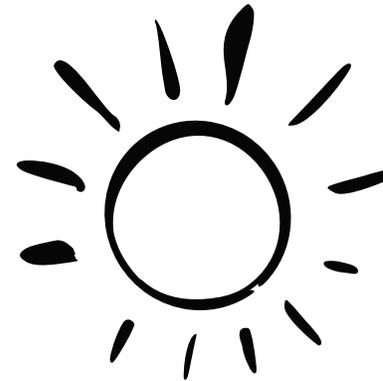
We work against bribery and corruption in all its forms. We don't accept or offer any payment or gift of significant value (whether in cash or anything else of value) that could be construed as a bribe. We declare personal or professional conflicts of interest that might impact our ability to make the right decision in OVO's best interests. We don't ever misuse a position of power to make personal gains.



9. Operate within the law

We comply with the law

We respect the laws of the countries in which we operate and stay compliant with them. We operate in regulated markets, and comply with all applicable regulations and conditions of our licences. We design our products and services to provide customers with all of their rights and safeguards under consumer laws. We believe in a competitive market and we comply with competition rules in all the places we do business. We are committed to compliance with our statutory tax obligations and to engaging with relevant tax authorities to ensure that we pay the right tax at the right time. We expect the businesses and people we work with to comply with their tax obligations and we do not help anyone we work with to evade tax. We encourage reporting of potential compliance concerns and take steps to investigate and, where necessary, correct our operations to ensure we remain compliant.



10. Seek out like-minded partners

We build lasting relationships with partners and suppliers whose values are consistent with our own

We recognise that partnering with organisations can enable us to achieve more together than we could do alone. We seek out partners and suppliers who share our values, and enter into partnerships in good faith, with the intention to build strong lasting relationships. We will consider such values in our criteria for selecting partners and suppliers for any new requirements. Our Supplier Code of Conduct sets out the standards, principles and values to which OVO expects its suppliers to adhere, including a commitment to eradicating modern slavery and human rights abuses. Our suppliers are encouraged to cascade these commitments through their supply chain.

11. Innovate responsibly

We take responsibility for the impact of our products and services, especially when it comes to customer and colleague safety

We recognise the importance of our role in developing, rolling-out and scaling-up technologies that will deliver clean affordable energy for everyone by driving energy efficiency, making the energy system smarter and decarbonising the home. To fulfill that role, we drive innovation whilst always applying rigorous standards of safety and continually assessing our impact on the environment. We take responsibility for how we bring our products and services into our customers' homes and provide training so that our people know how to do so in a way that is safe and sustainable.



How we hold ourselves to account

Doing the right thing means taking responsibility for the outcomes of our actions and behaviours - good and bad - and communicating them fairly.



12. Communicate responsibly

We report our business performance fairly and market ourselves responsibly

We are honest about how we are performing as a business and are committed to publicly disclosing periodic, fair and accurate reports of our performance in compliance with good practice and legislation. We conduct independent monitoring and auditing of our performance, including by engaging third parties where appropriate. And we report transparently and honestly on the actions we have taken to promote OVO's success as a company whilst upholding the interests of our people, wider stakeholders and the environment. In marketing and promoting our products and services, we strive to communicate responsibly in a way that does not mislead our customers, our people or our other stakeholders.

