

Our Code of Conduct.



Our Code of Conduct.

Our Code of Conduct defines what we expect of ourselves, upholds our OVO Values in how we conduct our business activities and how treat each other and our external stakeholders.

It's for everyone across OVO. Whatever your role is, 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 review our Code periodically to make sure that it remains relevant to our business. It's accessible to all OVO people on the OVO intranet, and a copy is published on our website. If you have any concerns or questions about this document, please contact the Sustainability team at sustainability@ovo.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

Is it against the law or could it breach any of our regulatory obligations?

Would you be embarrassed doing it if the customer was in the room?

Could it cause harm to people or the environment?

Would you be embarrassed if your decision was published in the media?

Does it break any of OVO's policies?

Would you feel uncomfortable explaining why you've made this decision to your friends or family?

If yes, STOP



If the answer to any of these is yes, then Stop! Speak to your line manager, and consult the relevant expert team for guidance on what to do.

Then consult an expert

Contact Legal or Risk & Compliance

Contact the People team to identify the relevant expert team

Contact Sustainability or Health & Safety

Contact the People team to identify the relevant expert team

Contact the team listed as the owner on the policy

Contact the People team to identify the relevant expert team

What to do if you see potentially unethical behaviour.

If you see 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're 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.



How we treat each other.

Our Code of Conduct

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.

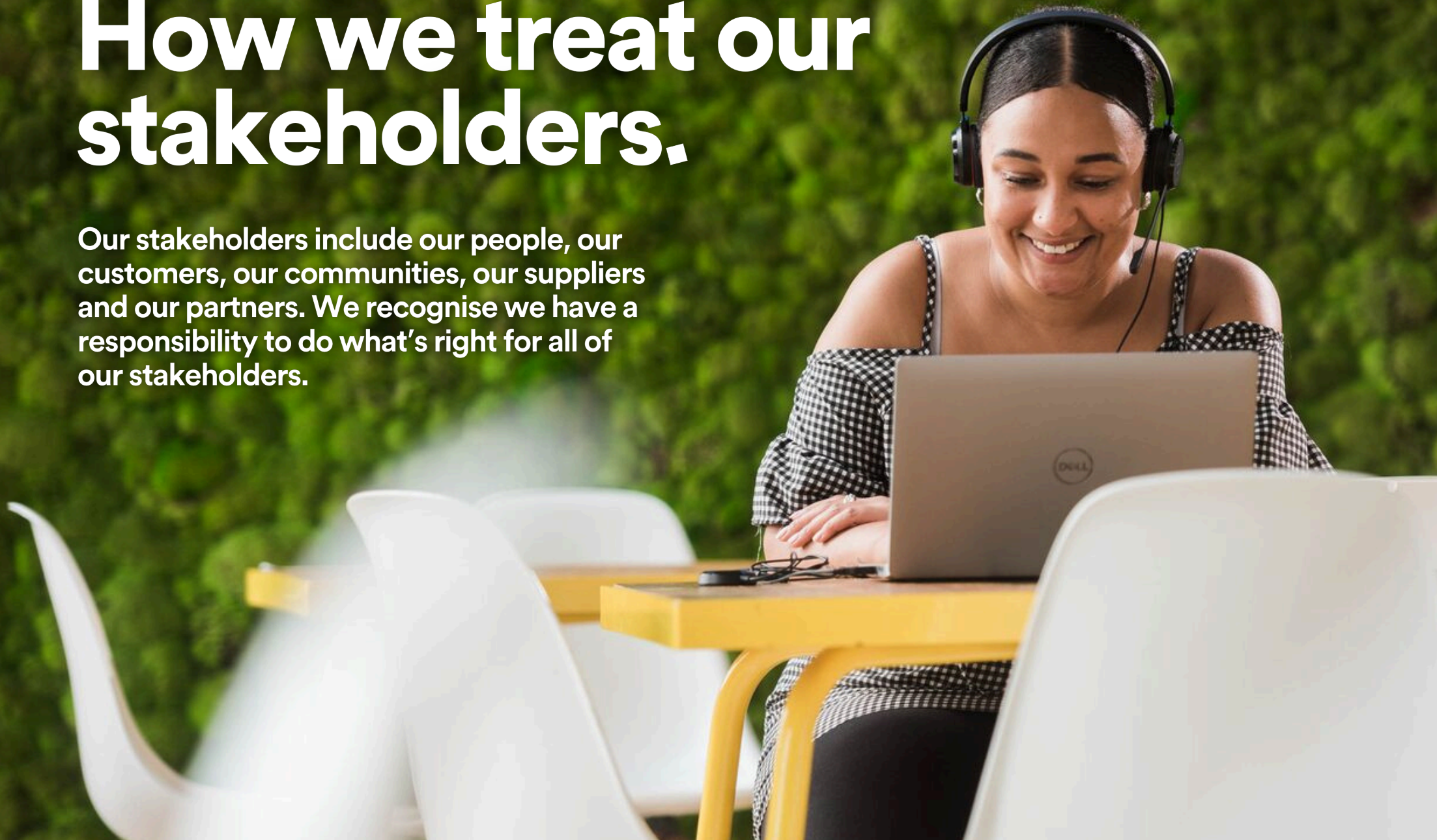
We do our best to support our people's financial, physical, social, spiritual and emotional wellbeing. We provide working conditions that will keep our workforce safe, healthy, engaged and thriving in their careers.

As colleagues, we look after each other. We believe in the power of the collective, so we're 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 for all of our stakeholders.



How we treat our stakeholders.

Our Code of Conduct

3. Care for our customers

We show our customers the same level of respect that we would want for 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 solve 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.



How we treat our stakeholders.

Our Code of Conduct

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. Delivering 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 work to improve our environmental performance over time - reducing negative impacts and maximising positive impacts on the environment.

We're 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.



How we conduct our business.

Our Code of Conduct

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 make sure that all of our business activities are done 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.



How we conduct our business.

Our Code of Conduct

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're comply with our statutory tax obligations and engage with relevant tax authorities to make sure 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 don't 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 make sure we're compliant with the law.



How we conduct business.

Our Code of Conduct

10. Seek out like-minded partners

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

We recognise that partnering with organisations can help us to achieve more together than we could do alone. We work with partners and suppliers who share our values, enter into partnerships in good faith, and who want to build strong, lasting relationships. We'll 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. This includes a commitment to eradicating modern slavery and human rights abuses. We encourage to share 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 understand the importance of our role in developing, rolling-out and scaling-up technologies that will deliver clean affordable energy for everyone. These will technologies will drive energy efficiency, making the energy system smarter and decarbonising the home. To fulfil 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 we 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.



How we hold ourselves to account.

Our Code of Conduct

12. Communicate responsibly

We report our business performance fairly and market ourselves responsibly

We're honest about how we're performing as a business. We periodically disclose, fair and accurate public 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. We report transparently and honestly on the actions we've taken to promote OVO's success as a company, while upholding the interests of our people, wider stakeholders and the environment.

In marketing and promoting our products and services, we work hard to communicate responsibly in a way that does not mislead our customers, our people or our other stakeholders.

