



# Our Code of Conduct

September 2022

drax



# Foreword

## A note from our CEO at Drax

We care about what matters and we're committed to conducting our business with honesty and integrity, and in accordance with all relevant laws and regulations.

In addition, we aim to follow through on our commitments - doing what we say we'll do. This is true of our engagement with colleagues (which, for the purposes of this Code of Conduct includes non-permanent workers), suppliers, business partners and other stakeholders. Whether you work for or on behalf of Drax, this Code helps you to do the right thing. It sets out our high-level principles in relation to several important topics and the standards of behaviour we expect from you.

If you're ever concerned that something isn't consistent with our Code, please speak up. You can talk to your line manager, supplier (for non-permanent workers), a member of Group Business Ethics, or to me through my Sli.do.

You can also contact our external 'Speak Up' service. I assure you that Drax won't tolerate any negative consequences to you as a result of you seeking advice, raising genuine concerns or reporting misconduct.

Thanks for reading and following our Code of Conduct.

Will Gardiner, CEO



Watch Will's introduction video to the Code of Conduct by clicking here

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# 1.0

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## Introduction

Welcome to our Code of Conduct.

The following sections introduce the Code, explain who it's for and provide advice and support for when you need it.





## 1.1

## About our Code of Conduct

Our Code of Conduct exists to help everyone at Drax 'do the right thing'.

It shows what we expect from our Drax colleagues - both permanent employees and non-permanent workers - and anyone working on behalf of Drax. The Code also helps us to aim for and maintain consistently high standards in everything we do.

This document features a range of individual, subject-specific codes to outline the principles we should all use in our work and in our behaviour. You can find further details in our supporting policies and guidance, where applicable. Look out for the references in the final '[Resources and contacts](#)' section, signposted in each individual code, which includes details of who to contact for further information, help or support.

If you're unsure what to do or you need assistance, refer to our ethical decision-making guide (section 1.5) or use the contact details shown. Please refer to specific policies for relevance to non-permanent workers.



## 1.2

## How to use this document

We've created this document to provide you with guidance for 'doing the right thing'. You should refer to it, as required, when carrying out your day-to-day work.

You can navigate through the document using the buttons at the top of each page as well as the hyperlinks within the text.

Read sections 1.5 and 1.7 to understand best practice – for when you're not sure what to do in a work-based situation, and for when you feel something isn't right.

Section 2 shows our Code of Conduct principles in their entirety. This provides a good overview of what we stand for as a company, and what you need to do to meet the standards we expect.

Read the individual codes themselves – which are split into groups (Our place in the world, Working together and How we conduct our business) – to:

- Get an overview of the subject matter's context
- Watch videos (where relevant) that bring the subject to life and supplement the eLearning materials on One Drax
- Understand the standards you're expected to meet
- See frequently asked questions (FAQs) for specific examples of how to apply these standards

Use the final section – '[Resources and contacts](#)' – for further information and contact details for help and support.



For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.

## 1.3

### Our purpose and who we are

Our purpose is to enable a zero carbon, lower cost energy future.

We'll achieve our purpose through focusing on our strategic aims: being a global leader in sustainable biomass pellets and negative emissions, and a UK leader in dispatchable, renewable generation.

Our heritage, beliefs, purpose and strategic goals form the basis for the way we conduct our business, and for our Code of Conduct. They help us be a purpose-driven organisation with a unique approach.

#### Our values

##### We care about what matters

We believe that achieving a positive economic, social and environmental impact is key to delivering long-term value creation.

##### We're a 'can do' kind of place

We have a diverse, inclusive culture where the continual exchange of ideas and perspectives leads to great things.

##### We see things differently

We see possibilities in how we can help to solve the climate crisis and seek new ways of doing things.

##### We listen carefully

We listen to our colleagues, communities, customers and partners to better understand their needs and deliver the best possible outcomes.

##### We do what we say we'll do

We're delivering on our purpose and believe we're a world leader in sustainable biomass and bioenergy with carbon capture and storage (BECCS).

## 1.4

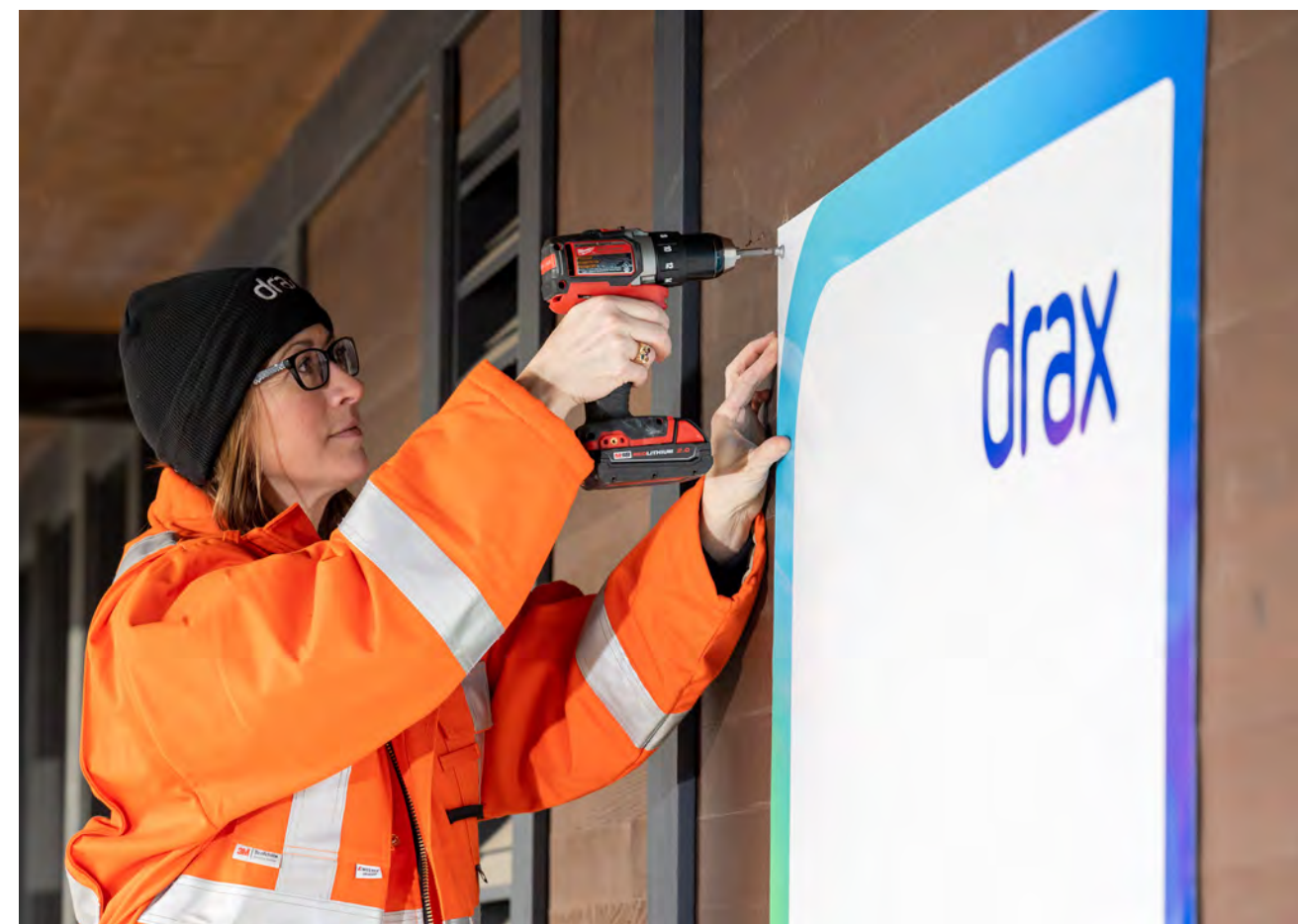
### Doing the right thing

The phrase 'doing the right thing' appears several times in the Code of Conduct.

In this context, it means acting in a way that positively represents and reinforces our values as Drax.

We've written our individual codes with 'doing the right thing' in mind. While they provide guidance and examples of common situations you might encounter, they can't cover everything.

If the situation you're facing isn't covered by the Code, use our 'Ethical decision making' guide (see section 1.5).





## 1.5

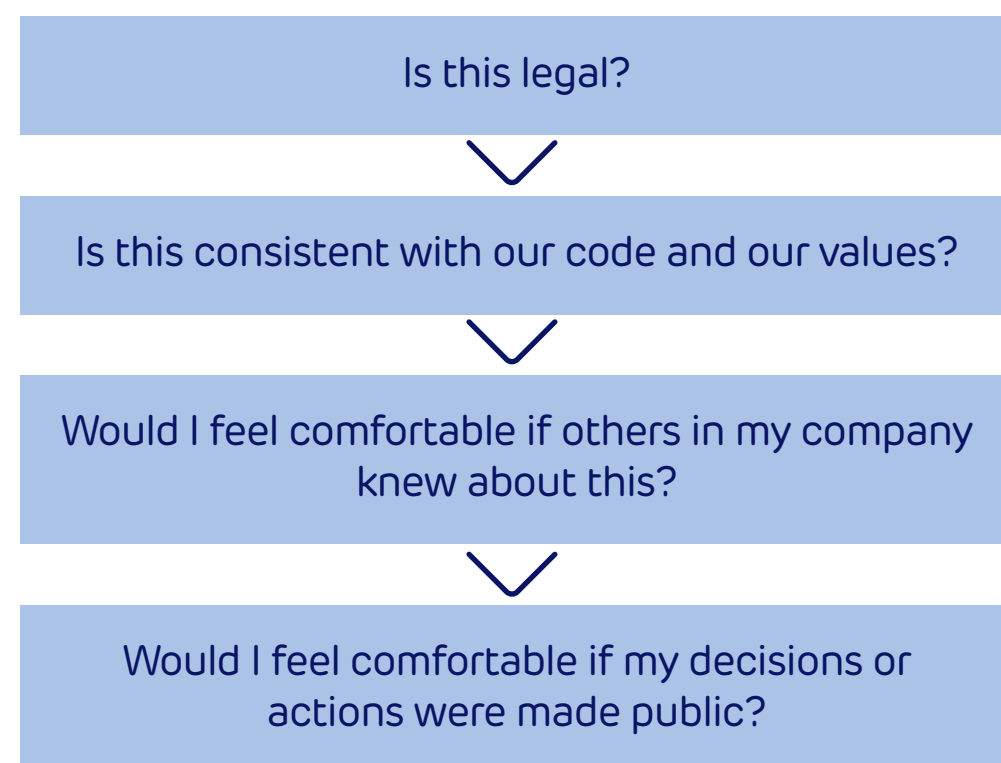
### Ethical decision making

The Code features a decision guide to help you choose the right course of action when faced with difficulties.

You should also speak to others – including your line manager or a colleague in the Group Business Ethics team – to help guide you.

Doing the right thing not only reinforces our values, it helps us comply with laws and regulations and builds positive working relationships with our customers, colleagues and third parties.

#### Ask yourself:



If you answer 'Yes' to all these questions, the decision to move forward is likely to be OK. If you answer 'No' or 'Maybe' to any question, stop and seek guidance before continuing.

## 1.6

### What happens when you don't follow the Code?

There are consequences for you, and for Drax, if you don't follow our Code of Conduct.

You might face disciplinary action for serious breaches. This could lead to dismissal and/or legal action (including prison sentences) for both permanent and non-permanent workers.

If Drax is found to be in breach of any individual codes, it could damage our reputation and adversely affect our working relationships and profits. In some instances, breaches could lead to Drax having to pay large fines, be under investigation and, potentially, be banned from providing certain services.

#### 1.6.1 Non-retaliation

We're committed to having an environment where you can ask questions and raise concerns about business ethics and conduct, without fear that it might have a negative impact on you.

Just like you'd report unethical business or breaches of specific codes, you should report any behaviour towards you that you feel is retaliation. In such situations, contact the Group Business Ethics team or the [Whistleblowing Officer](#).

## 1.7

# Speaking up

There may be times when you spot something at work that doesn't seem right – that doesn't follow our Code of Conduct.

In these instances, speak to either:

- Your line manager or another senior leader
- Your supplier (for non-permanent workers)
- A colleague in Group Business Ethics
- The Whistleblowing Officer

Alternatively, you can raise it via our external 'Speak Up' service using the details in section 1.7.2.

### 1.7.1 Group Business Ethics

Our Group Business Ethics team provides support on ethical matters beyond energy sector law and regulations. This helps make sure that our decisions match our aim to 'do the right thing'.

Within many of the individual codes, we recommend that you contact the team for help, support or further information if you feel something's not right.



**Web:** [Group Business Ethics Sharepoint site](#)

**Email:** [speak.up@drax.com](mailto:speak.up@drax.com)

### 1.7.2 External 'Speak Up' service

Drax provides access to an external, confidential service to raise concerns when you'd prefer not to speak to someone at Drax in the first instance. Safecall manages this service.

You can raise concerns anonymously via the service if you choose. You'll be given login details so you can track the progress of your report.

The Group Business Ethics team will be able to review the detail of the report (though not the name of the person who reported it, if they chose to remain

anonymous) and investigate if required. We treat all reported issues seriously and follow them up conscientiously, discreetly and without bias. Where necessary, we'll report the matter to the relevant authorities. You'll be updated on progress and any outcome in line with your anonymity preference.



**Tel:** +44(0)8009 151571 (UK) +1-87-75-99-80-73 (Canada)  
+1 866 901 3295 (US) +012 0921 067 (Japan)

**Web:** [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

### 1.7.3 Resources and contacts

For more information, search the documents listed below via the [Group intranet's 'Policies and Guidance' section](#).

- Speak Up (whistleblowing) policy
- Speak Up guidance for managers
- Speak Up guidance for colleagues

**Relevant tools:** [Group Business Ethics SharePoint site](#)

For help or support, or if you're unhappy with any aspect of the reporting process, speak to a colleague in the [Group Business Ethics](#) team.

Alternatively, you can contact the [Whistleblowing Officer](#), who'll organise an independent review.



Watch "Speaking up" video by clicking here

speaking  
up  
service



# 2

## Our principles

### 2.1 Our principles at a glance



## 2.1

## Our principles at a glance



### Our place in the world

- We're committed to being an environmental leader and enabling a zero carbon, lower cost energy future
- We make positive contributions to society within the communities where we work and we prioritise sustainability as an environmental leader



### Working together

- The safety and wellbeing of our colleagues, contractors and the public is our top priority
- We're committed to promoting a supportive, diverse and inclusive working environment, where you can be yourself and your contribution matters
- We take a zero-tolerance approach to bullying, harassment and discrimination



### Conducting our business

- We don't accept any form of bribery or corruption amongst our colleagues or third parties. We act in lawful, ethical ways that avoid conflicts of interest and seek constructive relationships with regulators, policy makers and politicians
- We protect Drax against fraud and don't defraud, evade tax or play any part in money laundering. We observe the trade controls of all the countries we operate in
- We always act with integrity, and comply with all legal and regulatory requirements
- We don't enter into anti-competitive agreements or abuse our market position
- We treat customers fairly – in all interactions
- We respect human and labour rights and we're committed to conducting our business relationships with honesty, integrity and respect
- We believe that the decision to join a trade union is an individual choice
- We act responsibly when gathering, processing and sharing personal data to make sure individuals' privacy rights are protected
- We ensure appropriate protection and handling of data
- We keep business information confidential, and never use it for personal gain or in a way that could harm Drax
- We use our assets and resources carefully, efficiently and for the benefit of Drax
- We make sure that our reporting is complete and accurate
- We make sure that the information we share is timely, accurate, and appropriate; we engage the External Communications team when required





## 3 Our place in the world

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- 3.1 Environment
- 3.2 Positive social impact

## 3.1

# Environment

### Principle

We're committed to being an environmental leader and enabling a zero carbon, lower cost energy future.

As a business, we've made public our ambition to become carbon negative by 2030. We'll achieve this through a combination of managing, monitoring, and reducing the environmental impact of our activities.

We'll continuously improve our operations, specifically in relation to emissions to air, discharges to water, disposal of waste and the use of natural resources. In our operations, we'll minimise any adverse impacts on biodiversity by protecting fauna and flora.

In addition, we'll keep safe the communities in which we operate and take our environmental responsibilities and commitments seriously. These communities include those around our sites and offices, as well as those touched by our supply chains.

Our purpose at Drax is to enable a zero carbon, lower cost energy future. And we're proud of our work and activities as a business to reduce the impact of climate change. Our target isn't just to comply with environmental legislation; we're committed to being an innovative sustainability leader.

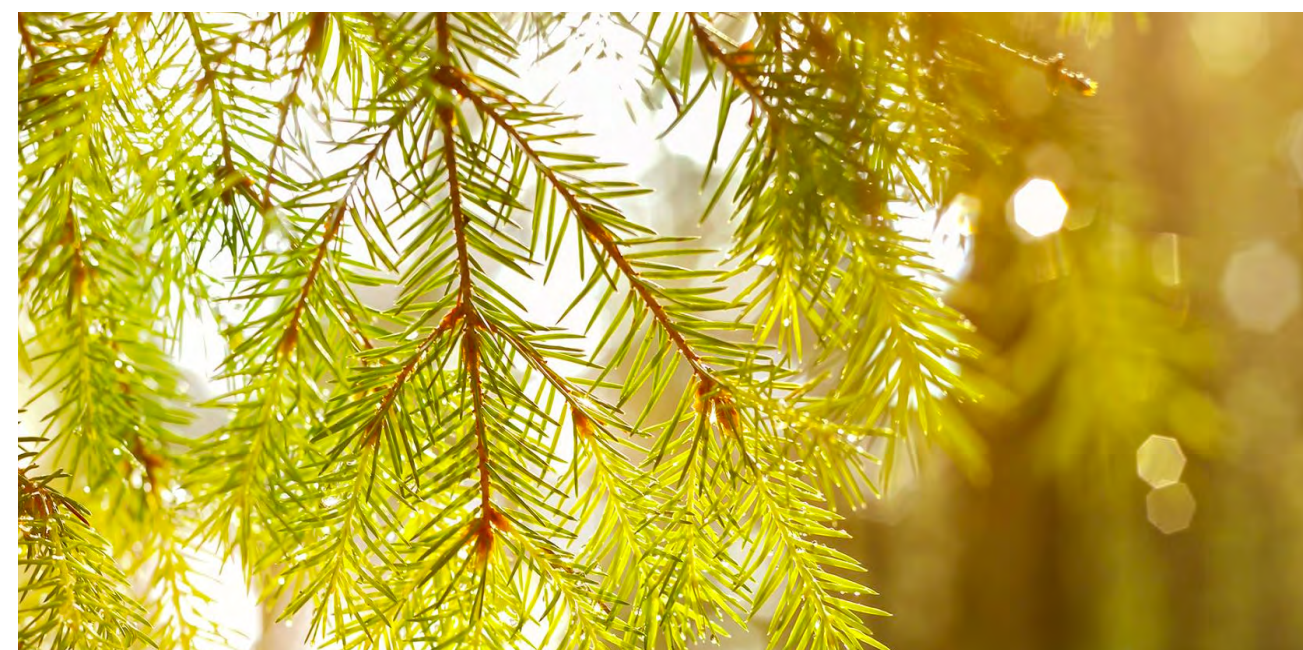
If we're to succeed, every colleague, business partner and supplier has to play their part.



Watch "Environment" video by clicking here



environment





## What you need to do

Aim to use resources efficiently and responsibly. For example:

- Save energy by turning off lights and shutting down your computer
- Use on-site recycling facilities and reduce the waste going to landfill
- Consider less carbon-intensive ways of commuting, such as our Cycle to Work scheme

In addition, you can:

- Remain open to taking part in local environmental initiatives
- Follow the guidelines and best practice shown in our Environment Policy and Sustainability Policy Statement
- Share ideas for improving either of the above documents
- Consider the sustainability, environmental and community credentials of suppliers in contracting decisions and favour those that reflect our standards

## FAQs

**Q:** What should I do if I believe my part of the business is in breach of environmental legislation?

**A:** Drax is committed to environmental compliance as a minimum standard, so you should raise the matter with your line manager, supplier (if you're a non-permanent worker), or a local colleague in the Environment team. You can also use one of our 'Speak up' channels.

**Q:** Do I still have to report an environmental incident if it caused no pollution?

**A:** Yes – you should report all environmental incidents, no matter what's happened. We investigate all reported incidents as it helps us identify hazards and implement changes to prevent them happening again.



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.





## 3.2

# Positive social impact

### Principle

We make positive contributions to society within the communities where we work and we prioritise sustainability as an environmental leader.

Our primary focus is to fulfil our purpose of enabling a zero carbon, lower cost energy future. This will offer a substantial contribution to society.

We also provide jobs, support economic growth, pay tax responsibly and deliver charitable donations and volunteering initiatives for colleagues in the communities where we work. This positions Drax as a responsible employer, supports our business strategy and helps build the foundations for future success.

Our social strategy focuses on improving social mobility and opportunity through our participation in Science, Technology, Engineering and Maths (STEM) subjects, and our education outreach, skills, and employability activities.

### What you need to do

- Familiarise yourself with the Community and Charity Policy and its recommended processes if you're aiming to engage in community or charity activities
- Listen to any requests from the community and raise them internally, as required



For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.

### FAQs

- Q:** Will I get support to work for voluntary organisations such as school committees or community groups?
- A:** The Community and Charity Policy states that Drax allows colleagues one day of paid time off per calendar year to take part in volunteering activities (refer to the Community and Charity Policy for eligibility).
- Q:** If a member of the community approaches me with a request or a concern, what should I do?
- A:** Forward any internal or external requests to [communityandcharity@drax.com](mailto:communityandcharity@drax.com). Raise concerns with your line manager or the Group Business Ethics team.



Watch "Positive social impact" video by clicking here

positive social  
impact





## 4 Working together

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- 4.1 Health, safety and wellbeing
- 4.2 Diversity, equity and inclusion (DE&I)
- 4.3 Dignity at work



## 4.1

## Safety, health and wellbeing

### Principle

The safety and wellbeing of our colleagues, contractors and the public is our top priority.

We work together at Drax to make our workplaces safe, healthy, and secure for ourselves, our colleagues, our contractors and visitors, and our communities.

Our OneSafeDrax vision means making sure we do no harm to our colleagues and the public and recognising that our people are at the heart of everything we do.

We all need to play a part in keeping our workplaces safe: by looking out for our own safety and that of others; by following our safe working practices; by reporting anything unsafe.

Being under the influence of alcohol and drugs can affect our health, the safety of ourselves and others, and our work performance. We aim to support colleagues with drug or alcohol problems and keep everyone safe and well.

Our 'My Wellbeing' resources focus on mental, physical, social, and financial wellness. These resources can improve awareness of the tools needed to uplift personal and team resilience. We've also provided helplines and training for managers in supporting wellbeing, to build an organisation that encourages wellness for all colleagues.

### What you need to do

- Avoid putting yourself or others at risk
- Stop work if you think it's unsafe
- Check our Group Safety, Health and Wellbeing Policy, or speak to your line manager, if you're not sure whether an action or decision is safe
- Be alert to safety hazards and processes
  - Share your ideas for improving our work practices
  - Report anything that's unsafe
  - Always comply with the safety Golden Rules (see the 'Resources and contacts' section of this Code)
- Report any near misses or safety breaches via our online reporting systems so that we can put things right
- Visit 'My Wellbeing' to find tools supporting mental, physical, social, and financial wellness



Talk to your manager, HR business partner or our confidential employee assistance provider if you need support with work or personal issues. See the 'Resources and Contacts' section.



## FAQs

**Q:** Do I really have to report a minor incident if nobody had to take time off work?

**A:** Yes – please report all incidents since the information we gather helps us build a picture of the safety risks across our business.

**Q:** I'm struggling with personal issues and they're troubling me at work. What should I do?

**A:** At times, we all need extra support in our lives. Speak with your line manager, supplier (if you're a non-permanent worker), or your local Human Resources (HR) team in the first instance. Also remember you can contact our employee helplines (details in the 'Resources and contacts' section) 24 hours a day, 365 days a year.



Watch "Safety, health and wellbeing" video by clicking here

safety, health and  
wellbeing



For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.



## 4.2

# Diversity, equity and inclusion (DE&I)

### Principle

We're committed to promoting a supportive, diverse, and inclusive working environment, where you can be yourself and your contribution matters.

A commitment to diversity and inclusion is critical to achieving our strategic goals, so we're designing ways of working that are inclusive and enable access to opportunity for all.

The expertise of our colleagues is a valuable resource; everybody's contribution matters. We believe that by embracing and valuing the differences in who we are, our experiences and how we think, we'll achieve greater things together.

Diversity is understanding and accepting that we're all different and recognising the importance of treating each other with dignity and respect.

We encourage and support each other to be ourselves, regardless of:

- Age
- Sex
- Ethnicity, culture, or race (including colour, nationality and ethnic or national origin)
- Disability (including any cognitive variations or mental health conditions)
- Gender or gender identity
- Whether we're married or in a civil partnership
- Whether we're pregnant, on maternity leave, or parents
- Religion or belief
- Sexual orientation
- Educational or social background
- Physical appearance
- Life experiences

Inclusion means embracing everyone's individual differences while working together to make sure all colleagues feel they belong and are valued and respected. Building an inclusive culture ensures everybody has what they need to access opportunities.

We consider diversity and inclusion in everything we do, and we all have a role to play in making sure we have an inclusive workplace. It's our responsibility to treat one another with dignity and embrace our differences.



Watch "Diversity, equity and inclusion" video by clicking here



diversity, equity and  
inclusion



## What you need to do

- Understand that your views and opinions may differ from those of your colleagues and be respectful when challenging others
- Challenge or report inappropriate behaviour to your line manager
- Respect the confidentiality of your colleagues
- Take responsibility for your actions and aim to be a role model
- Make decisions about recruitment and development based on capability, competence, and potential
- Work in diverse teams to produce better results

## FAQs

**Q:** What do I need to do if a person with a disability applies for a role I'm recruiting?

**A:** You need to make sure you follow a fair, flexible, and inclusive process, making necessary adjustments in line with the needs of the candidate wherever possible.

**Q:** A member of my team works part time so can't attend an off-site meeting due to childcare commitments. Should I proceed with the meeting as arranged?

**A:** You should, where possible, rearrange the date and/or time of your off-site meeting to make sure all team members can participate.



For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.



## 4.3

# Dignity at work

### Principle

We take a zero-tolerance approach to bullying, harassment, and discrimination.

We believe that everyone should be treated with dignity and respect. Individuals are different in many ways and we want to embrace and celebrate this diversity.

Equality is the right of different groups of people to not be subjected to discrimination because of their individual characteristics, but to be treated equally and fairly. Some jurisdictions in which we operate have specific legislation related to this, e.g. the Equality Act 2010 (in the UK) and the Equality Act of 1974 (in the United States). Both provide a legal framework to protect the rights of individuals and advance equality of opportunity for all.

Under the UK legislation, the protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership (in employment only)
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

We each have a responsibility to nurture a positive environment, free of bullying and harassment. Think about how your behaviour or language might affect others, or how they may interpret it.

It's important to understand that bullying and harassment can take many forms; what you consider 'friendly banter' may not be perceived in the same way by everyone else. Promoting equality, dignity, and respect results in:

- Fair treatment of people
- Appreciation of our diverse workforce
- Good morale and higher levels of motivation
- Better performance
- A loyal workforce and business stability
- Improved reputation for the organisation as a whole

### Conflict resolution

If there's conflict between colleagues, try to show understanding and resolve things informally in the first instance. However, you can raise a formal complaint if the issue escalates. When a manager becomes aware of a complaint, they'll take prompt action to investigate.

A formal complaint could lead to disciplinary action. You shouldn't fear that you'll be victimised for raising a complaint of bullying or harassment, or for assisting in relevant investigations.

Retaliation against a colleague for voicing concerns is seen as victimisation and may lead to disciplinary action.



## What you need to do

- Treat colleagues with dignity and respect, and in an inclusive manner
- Think about your comments or jokes before you make them, to avoid being rude or insensitive, or causing offence
- Consider this Code in all your communications, no matter how informal
- Contact your local HR team if you think you are, or a colleague is, being bullied, harassed, or victimised
- Be responsible for your own behaviour at work and whenever you're representing Drax (including on social media)



Drax can also be held accountable for the behaviour of its third parties, so raise any relevant concerns you may have with the Group Business Ethics team or via one of our 'Speak up' channels.

## FAQs

**Q:** I've heard my colleagues make some unfavourable remarks about my sex. However, these have all been verbal – does it still amount to sexual harassment?

**A:** Sexual harassment can be verbal or non-verbal. Words or gestures can cause offence. Jokes, stories and inappropriate comments or actions could be considered a form of sexual harassment.

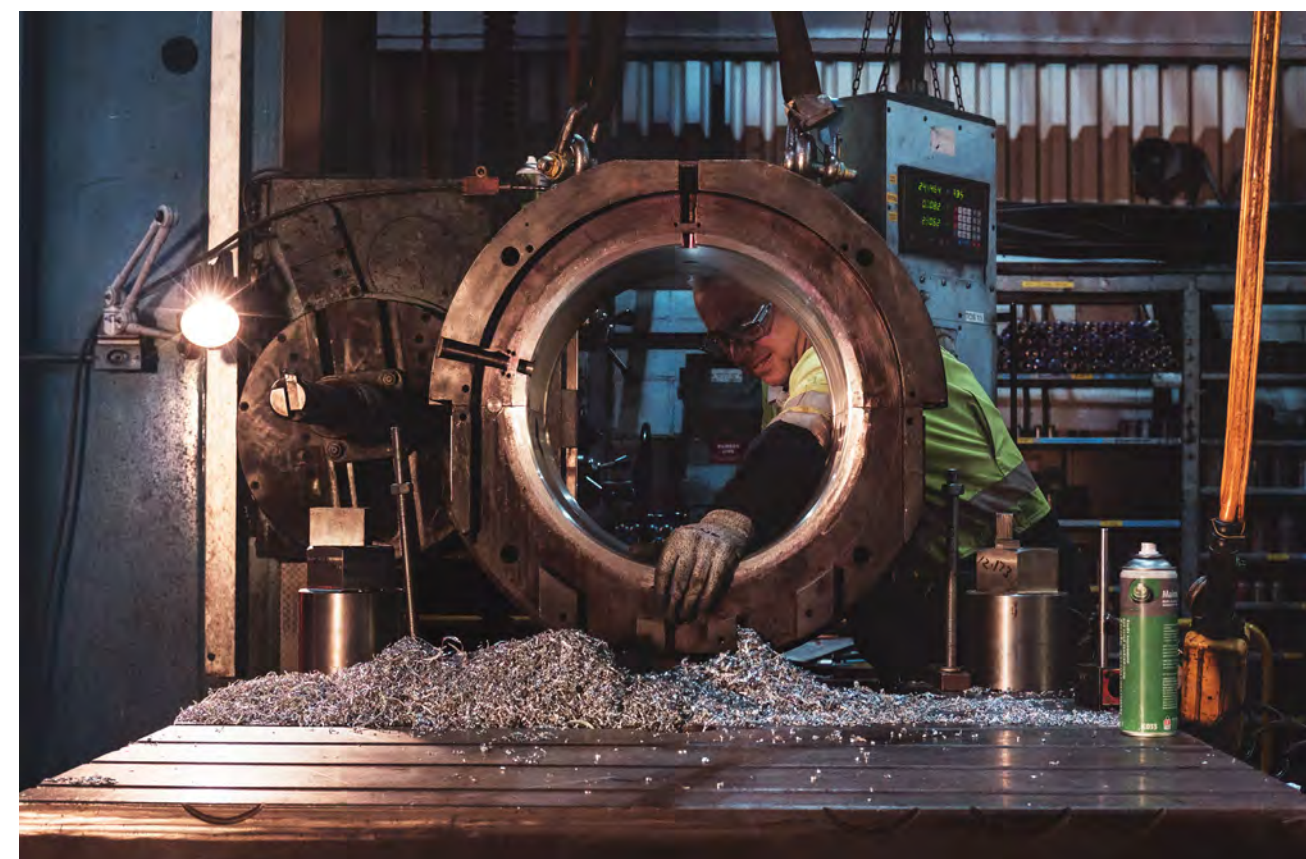
**Q:** I was recently at a team meeting and one of my colleagues began to shout at me and put down the suggestions I raised. Is this considered bullying?

**A:** We expect colleagues to act in a professional manner – shouting or raising your voice at a colleague is not professional and could be considered bullying. You should let your manager know about your concern. If you aren't comfortable doing that, you should contact a local HR colleague, Group Business Ethics, or the external Speak Up service.



Watch "Dignity at work" video by clicking here

dignity at  
work







## 5 How we conduct our business

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- 5.13 Media and communications



## 5.1

# Anti-bribery and corruption

### Principle

We don't accept any form of bribery or corruption amongst our colleagues or third parties. We act in lawful, ethical ways that avoid conflicts of interest, and seek constructive relationships with regulators, policy makers and politicians.

Drax operates a zero-tolerance policy to bribery and corruption across its entire business.

Bribery is usually used to get an unfair business advantage. Corruption is the abuse of entrusted power for private gain. Both are against the law and against Drax's principles.

We need to be aware of the different forms bribery and corruption can take so we can be sure we're operating ethically and protecting our reputation. If colleagues are found to be involved in bribery or corruption, a disciplinary process will be started which could result in dismissal and/or legal action.

For Drax, evidence of bribery or corruption could have a serious impact on its brand, its reputation and its profits.

We investigate any concerns and take action if evidence of bribery or corruption is found.

### What to be aware of

As well as more obvious cases like unofficial cash rewards or incentives between businesses, we need to look out for the following types of bribery and corruption:

#### Facilitation payments

These are unofficial payments made to encourage or speed up processes such as the issuing of permits or licenses. They're also referred to as 'bungs' or 'backhanders'.

#### Unreasonable gifts and hospitality

Offering or accepting gifts and/or hospitality should be clearly in the interests of maintaining genuine business relationships, otherwise it could be seen as a form of bribery or corruption.

#### Conflicts of interest

A conflict of interest occurs when someone's own interests interfere with them performing their role properly or may interfere with the best interests of Drax. Financial, commercial, or other 'out of work' relationships can create potential or actual conflicts. Sometimes a relationship can be perceived as a conflict of interest, to avoid doubt, you should report this.

Examples could include a colleague:

- Having a financial interest – such as a shareholding – in a company with which Drax has a commercial relationship
- Acting as a director of another company that's a supplier to Drax
- Being a member of an organisation that opposes the business activities of Drax

## Interactions with public officials\*

This business interaction poses a particularly high risk in relation to bribery due to the strict rules and regulations in many countries. It's prohibited to provide money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their official capacity.

We should be particularly mindful of:

- Political donations - we don't give donations to political parties (i.e. to fund electoral campaigns)
- Political lobbying - we take extra care in any dealings with policy makers, politicians, regulators and government; we stay honest and transparent in communications, and work in line with relevant laws
- Gifts and hospitality - when dealing with public officials, colleagues should seek approval from the External Affairs team before providing accommodation, expenses or hospitality



Watch "Anti-bribery and corruption" video by clicking here



\*including employees of government-owned or controlled commercial enterprises, international organisations and political parties, those in government departments and political candidates themselves

## Managing bribery and corruption risk

### Ethical due diligence

Conducting due diligence before signing a contract ensures that any risks are flagged early on and that we're able to verify third parties and individuals working with, or on behalf of, Drax.

Drax takes a risk-based approach and selects those that demonstrate their values and commitment to ethical business practices.

Our Ethical Due Diligence guide provides instructions on how to request ethical due diligence prior to onboarding a new third party. If you have any questions about this process, or about the third party you'd like to work with, please get in touch with the Group Business Ethics team.

### Gifts and hospitality

Offering or accepting gifts and/or hospitality should be clearly in the interests of maintaining genuine business relationships. If this isn't the case, others may see it as a form of bribery or corruption.

If you're exchanging gifts and/or hospitality, refer to the Gifts and hospitality guide.

### What you need to do

- Never offer, pay, invite or accept a bribe. The only exception is if there's a credible threat to your personal wellbeing, health or safety
- Don't make facilitation payments of any value
- Familiarise yourself with the Gifts and Hospitality guide, and only offer or accept gifts or hospitality which it recommends are acceptable
- Record gifts or hospitality offered or accepted, as required
- Avoid financial, commercial or other relationships that could conflict – or be perceived as conflicting – with Drax's interests or the performance of or its business operations
- Report potential or actual conflicts of interest to your line manager and Group Business Ethics in line with the Conflicts of Interest guide
- Never offer money, hospitality or gifts to politicians, government officials or regulators - or accept these from them - without permission



- Get approval for charitable donations, in line with the Community and Charity Policy
- Be honest and transparent in dealings with governments, their agencies and representatives
- Don't engage in personal political activities in work time or using Drax's resources without authorisation
- Make sure that suppliers and all other third parties are assessed via the ethical due diligence process described in the Ethical Due Diligence guide
- Report to the Group Business Ethics team if a third party's behaviour goes against the principles in this Code



## FAQs

**Q: I need to use a supplier that's not approved on the system – what should I do?**

**A:** You shouldn't use a supplier unless they've been approved, because it exposes the business to unknown risks. Contact the Group Business Ethics team for more information about supplier approvals and to report any knowledge of non-approved suppliers already acting for Drax.

**Q: One of our suppliers has invited me to a major tennis tournament. Can I accept?**

**A:** Firstly, assess whether your attendance serves a legitimate business purpose, and that it's proportionate. If you decide to proceed, get your line manager's approval. Lastly, ensure that you record your attendance, and any gift and/or hospitality that you're giving or receiving transparently. Check the 'Gifts and hospitality' guide.

**Q: My partner works for a company that's a supplier to Drax. Sometimes I'm responsible for purchasing items that may come from this supplier. What should I do?**

**A:** Purchasing from this supplier may be a conflict of interest, but it would – in the initial assessment – depend on your partner's role. Inform your line manager and raise it (via our Self-Service Portal) as a potential conflict. Group Business Ethics will assess and put in place the necessary mitigations to avoid a conflict.

**Q: As a Drax colleague, can I stand for political office?**

**A:** Yes, as long as you're not using the Drax name or attributing your views to the business. Drax must authorise any activity that you plan to do during work time. Speak to your line manager for further guidance.



**For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.**

## 5.2

# Financial crime

### Principle

We protect Drax against fraud and don't defraud, evade tax or play any part in money laundering. We observe the trade controls of all countries we operate in.

We take a strong stance on financial crime, always act with integrity, and expect those wanting to do business with us to do the same.

### Fraud, deception and dishonesty

We must be vigilant to protect Drax against fraud, and ensure the criminal activity of a third party doesn't have a negative impact upon us. If we identify fraud, we'll report those involved to the appropriate law enforcement agency/agencies.

Fraud is usually carried out for profit. It's a criminal offence in most countries and can include:

- 'False representation' – a false or misleading statement made knowingly
- 'Fraud by failing to disclose information' – failure to make information known where there's a legal duty to disclose it
- 'Fraud by abuse of position' – acting against the financial interests of a person or company when expected to safeguard them
- Possessing, making or supplying goods for fraudulent use
- Obtaining services dishonestly

Others may try to defraud Drax, so it's important to be vigilant of attempts such as phishing emails.

### Tax evasion

Tax evasion is a type of fraud that arises through the illegal non-payment or underpayment of taxes owed. Drax doesn't tolerate tax fraud within its own business or its supply chains. We've designed our ethical due diligence and payment procedures to make sure we comply with relevant tax laws.

### Money laundering

Money laundering is another form of financial crime where criminals seek to introduce funds of criminal origin into the legitimate economy. Refer any concerns to Group Business Ethics.

We'd never knowingly facilitate money laundering, and we report any suspicion of money laundering to the appropriate authorities.

### Financial and trade sanctions

Sanctions are political, trade, or financial restrictions aimed at bringing about a change in another country or in an individual's activities or policies. In particular, sanctions are used if breaches of international law or human rights have occurred, or democracy is threatened.

The scope of international sanctions is widening for many reasons, such as the ongoing and increasing threat of terrorism and international conflict. Sanctions can take many forms; the most relevant to Drax relate to financial matters and trade.

Drax will not transact with nation states, entities and/or individuals in breach of sanctions imposed by the UK, US, Canada, European Union (EU) or United Nations (UN). To do so may be a criminal offence.

We should always know who we're doing business with and be alert to the possible impact of sanctions. Our Ethical Due Diligence guide explains our third party onboarding procedures, which can help mitigate this risk.



## What you need to do

- Look out for any fraudulent or illegal activity and immediately report any suspicions to Group Business Ethics
- Make sure that any corporate disclosures (i.e. external reporting) you're responsible for are accurate and reliable
- Initiate ethical due diligence on any new third party you wish to use by following the instructions in the Ethical Due Diligence guide
- Don't make any 'false representations' in statements or reports, or in any of your dealings on behalf of Drax
- Don't abuse a position in which you're expected to safeguard, or not to act against, the financial interests of another party or individual
- Comply with all applicable tax laws, and don't knowingly facilitate others to commit tax evasion
- Don't be involved in any way with the concealment, transfer, arrangement, use or possession of criminal property or its removal from the relevant country
- Don't be involved in any way with the provision, use, possession or arrangement of funds or property that could be used to contribute to terrorist activity
- Be careful not to violate - or be inadvertently perceived to violate - domestic and international sanctions in all commercial activities



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.

## FAQs

- Q:** I believe a colleague may be colluding with a supplier to defraud Drax. What should I do?
- A:** Immediately report the matter to the Group Business Ethics team by going to 'How to report concerns' on the Group Business Ethics SharePoint. Alternatively, report the matter through the external 'Speak Up' service.
- Q:** We've identified and prevented an attempted fraud thanks to our procedures. Do I need to do anything else to follow up?
- A:** Yes – provide the details to the Group Business Ethics team. They'll pass them on to the appropriate law enforcement agency/agencies. The team may also be able to learn something from the attempt, even though our procedures prevented the fraud.



Watch "Financial Crime" video by clicking here

financial  
crime

## 5.3

# Fair competition

### Principle

We don't enter into anti-competitive agreements or abuse our market position.

Competition and anti-trust laws aim to protect the consumer by upholding fair behaviour in business. The laws prohibit anti-competitive agreements and behaviour – particularly between businesses that operate in the same sector – and the abuse of dominant market positions.

The laws also prohibit sharing, exchanging, or discussing any competitively sensitive information with competitors. Doing so may be interpreted as entering into an illegal agreement and subject to severe penalties.

Examples of behaviour that could lead to penalties include entering into understandings or agreements to:

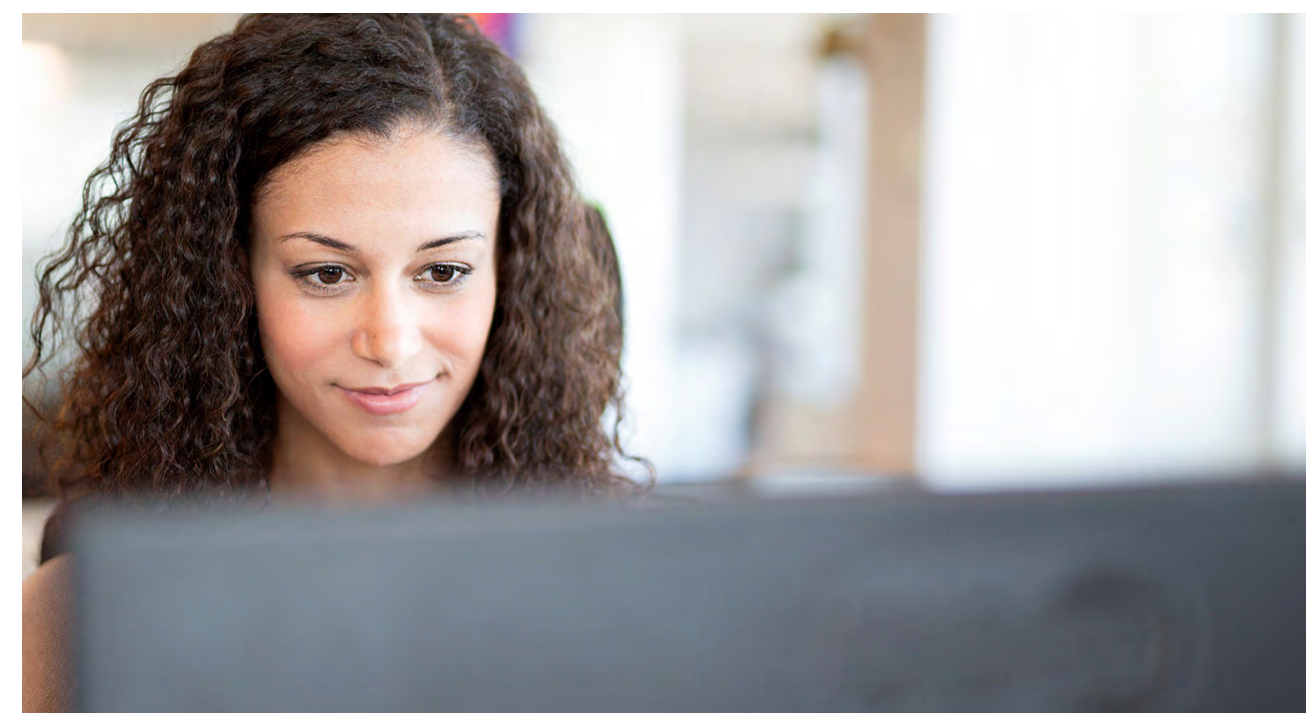
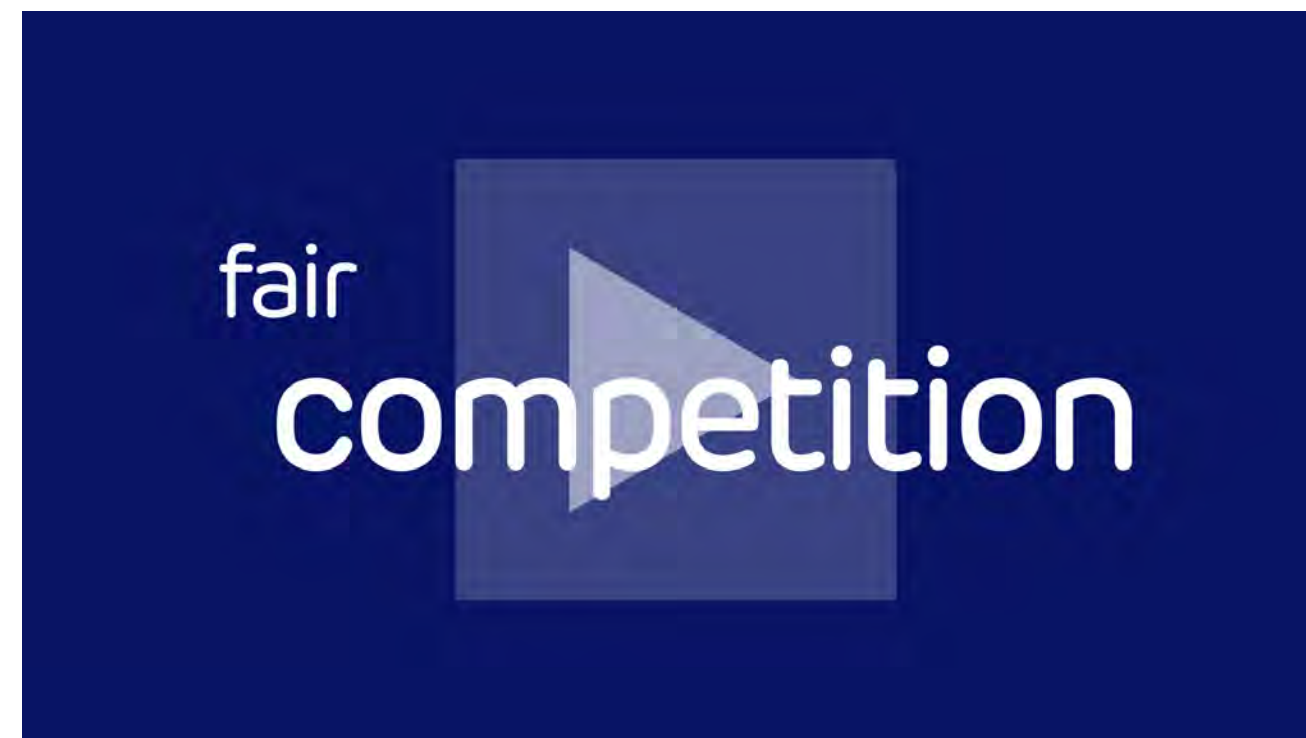
- Allocate products, territories, customers or employees
- Bid, not bid, or agree on the content of any proposed bid
- Fix, increase, decrease, stabilise, or standardise prices or production output or capacity
- Not do business with certain companies, customers, distributors or suppliers
- Not solicit a competitor's customers, distributors, suppliers or employees

Failure to comply with these laws can expose Drax to the risk of reputational damage, penalties including substantial criminal fines, and claims for substantial monetary damages from third parties. It may also expose individuals to criminal prosecution and directors to disqualification.

If the competition authorities decide to investigate Drax, they may read any document we write, or record we create, including emails and messages. It's therefore important to remain professional in all our communications.



Watch "Fair Competition" video by clicking here





## What you need to do

- Don't make formal or informal agreements with competitors that result in price fixing, bid rigging, market allocation or arrangements to limit supply
- Consult a member of the Group Legal team before you even consider any restrictions on customers, joint venture partners or suppliers (in terms of who they can sell to or buy from, and on what terms)
- Don't share with competitors any commercially sensitive information relating to prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins



Report any suspicions or allegations of anti-competitive behaviour to the Group Legal team. Seek the team's advice if you're unsure how to proceed or need more guidance .

## FAQs

**Q: During a trade association meeting, two of our competitors started to discuss profit margins and unit costs. Should I have intervened at the meeting?**

**A:** Yes. A regulatory authority may conclude that everyone at the meeting implicitly agreed to use the information to align prices. If you find yourself in that situation, you should state that you believe the conversation is inappropriate, leave the meeting immediately, then speak to a colleague in the Group Legal team.

**Q: I've inadvertently forwarded some commercially sensitive information to a third party. What should I do?**

**A:** If you sent the information by email, recall the email if possible, then immediately contact the recipient(s) and confirm that you sent it in error. Ask them to delete it and not use or share it. Seek and obtain written confirmation from the recipients that they've done so and discuss the issue with your line manager or a colleague in the Group Legal or Group Business Ethics teams.



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.





## 5.4

## Treating customers fairly

### Principle

We treat customers fairly in all interactions.

We're committed to treating our customers fairly and being honest, transparent, appropriate and professional in all our interactions with them. We also have a clear complaints procedure if things go wrong.

We make sure that:

- The information we provide is clear, accurate and easy to understand
- We give our customers the best possible service
- We deliver great service to our customers, so they're more likely to stay with us and recommend us to others.
- We make sure that we conduct our customer marketing activities fairly and lawfully and that we respect their preferences.



Watch "Treating customers fairly" video by clicking here

treating  
customers fairly

### What you need to do

- Be open, honest and transparent
- Provide clear, complete and accurate information
- Engage with customers about products and services relevant to them, and respect their marketing preferences
- Make it easy for customers to contact us, and respond promptly when they do
- Swiftly put things right if they go wrong
- Communicate clearly and simply
- Be consistent in doing what we say we'll do
- Enable a fair outcome for the customer
- Respect the privacy of our customers' personal information, and make sure it's protected
  - Note: In Drax Customers, colleagues receive more detailed training via an eLearning module. This includes how we meet our supply licence requirement to treat our customers fairly, also known as 'Standards of Conduct'.

### FAQs

**Q:** A customer received an email that clearly doesn't meet our expectations relating to fair treatment. What should I do?

**A:** Alert the Consumer Compliance team as soon as possible.

**Q:** A customer thinks they've received information in an email that doesn't relate to them. What should I do?

**A:** Log an incident through the Self-Service Portal, as it may be a personal data breach.



For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.



## 5.5

# Market abuse

### Principle

We don't misuse inside information and we trade Drax securities in compliance with applicable laws and regulations.

Market abuse is behaviour that affects the integrity of financial markets and/or wholesale energy markets and prevents market transparency.

The regulations about market abuse protect investors, and we support the regulations by safeguarding against market abuse. Attempting to affect markets by abusing inside information (see definitions below), or attempting to manipulate markets by knowingly spreading false information, are serious offences.

### Drax securities

Drax securities can take the form of equities (ownership via stocks and shares) or debts (money borrowed and due for repayment).

They're dealt in ways that include:

- The purchase, sale or transfer of shares
- The exercise of share options
- Entering into contracts for difference or equity swaps

As Drax securities are publicly traded, colleagues dealing in them must comply with the strict rules that prevent market abuse. Anyone in possession of 'inside information' can't deal in, or recommend that another person deals in, Drax securities. Dealing when in possession of inside information is both a civil and criminal offence.

We define 'inside' information relevant to securities as information that:

- Is of a precise nature
- Is not generally available (so you only know it because you're a Drax colleague)
- Relates, directly or indirectly, to Drax or any Drax securities
- Would, if generally available, be likely to affect the price of Drax securities

Examples might include:

- Major business developments, like substantial projects
- Regulatory developments
- Dividend announcements
- Significant changes in expectations of our performance
- Changes to our Board of Directors
- Major contracts awarded

Only authorised people should access and disclose inside information relating to Drax. If you find yourself in possession of inside information, contact the Group Company Secretary immediately. Colleagues may face disciplinary proceedings (and consultants/contractors may be in breach of their contract with Drax) if they abuse inside information, and may also face civil or criminal proceedings.

### Wholesale energy market

The Drax Generation business buys and sells power on the wholesale energy markets. Drax as a company, and individual colleagues, must comply with strict rules that prevent market manipulation. Adhering to these rules avoids Drax entering into energy-product contracts when it is, or its colleagues are, in possession of inside information.

We define 'inside information' relevant to the wholesale energy market as information that:

- Is of a precise nature
- Is not generally available (so you only know it because you're a Drax colleague)
- Relates, directly or indirectly, to Drax, any other market participant or any wholesale energy product
- Would, if generally available, be likely to have a significant effect on the price of wholesale energy products

## What you need to do

- Don't deal – or recommend that anyone else deals – in any Drax securities if you're in possession of inside information
- Don't deal in the securities of other companies if you've come into possession of relevant inside information through your work



Watch "Market abuse" video by clicking here

market  
abuse

- Don't share any confidential information about Drax (including any inside information) except where you're required to do so as part of your employment/engagement
- Read and understand the Group-wide Regulation on Energy Market Integrity and Transparency (REMIT) Policy, and comply with its guidance if you're involved in:
  - Dealing wholesale gas or electricity
  - Declaring inside information relating to Drax units to the public



Contact the Group Company Secretary (Drax securities) or the Wholesale Market Compliance team **immediately**:

- If you come into possession of inside information
- For advice before dealing if you intend to enter a transaction

## FAQs

**Q:** Why would I need to submit a 'permission to deal' request, and how would I do it?

**A:** If you're on the 'clearance to deal' list, or on a confidential project list, you'll need to seek permission before dealing in Drax securities. You can do this via the [Howells online portal](#) and by selecting the 'Request consent to deal' tab. Contact the Group Company Secretary if you need any help.

**Q:** I think I have inside information in relation to the availability of a Drax generation asset, or one belonging to a third party. What should I do?

**A:** Inside information relating to our generation assets (and those of third parties) is particularly relevant to REMIT. Don't disclose this information to anyone else – instead, contact the Wholesale Market Compliance team immediately.



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.



## 5.6

# Human and labour rights

### Principle

We respect human and labour rights, and we're committed to conducting our business relationships with honesty, integrity and respect.

Human rights are basic rights that belong to all of us. They're based on important principles like respect, fairness, dignity and equality. Human rights laws are an important means of protection for us all, but especially for those who may face abuse, neglect and isolation.

Respecting human rights is fundamental to the sustainability of Drax, our colleagues and the communities in which we operate. We're committed to preventing any abuse of human rights within our business operations and throughout our connected supply chains.

At Drax, we have zero tolerance for modern slavery in any form, including human trafficking. That means we'll work to identify any risk of modern slavery in our own business and supply chains. It also means that if we identify risks, we'll strive to understand the causes and seek to mitigate or eliminate them.

Each year, we report on our work to reduce the risk of modern slavery in our business and supply chains. These annual statements are available on [our website](#).

### Supply chain

We don't tolerate human rights breaches – either within Drax or across our supply chains. Therefore, we conduct ethical due diligence on those we work with.

We participate in the UN's Global Compact and use internationally recognised human rights standards (e.g. UN Guiding Principles on Business and Human Rights) to influence decisions about our supply chain. Wherever there's an impact upon human rights, we believe it's vital to address, mitigate and correct it ourselves.

If we work with an individual or organisation that can't uphold our commitment to human rights, we'll take relevant action. This may include ending the working relationship and reporting the abuse: victim protection and remediation of issues will always be our primary concern in these circumstances.



Watch "Human rights" video by clicking here

A dark blue rectangular area containing the text "human rights" in white. The word "human" is on the top line and "rights" is on the bottom line. A large, semi-transparent white play button icon is centered over the text.

human  
rights

## Fair pay

Remuneration is a key aspect of every colleague's quality of life. We operate a fair reward and recognition process that's supportive of fair pay, employment rights and development.

We pay everyone directly employed by Drax in the UK at least the real Living Wage. We pay everyone directly employed by Drax outside of the UK in line with respective local laws.

We give clear written information about pay to anyone due to start working for Drax, before their employment begins. Each time we pay them, they'll receive the details for the pay period concerned (as set out on colleague payslips).

## Working hours

When setting our standard working hours, we aim to:

- Make sure we can meet our business needs
- Enable colleagues to maintain a healthy work/life balance
- Operate within the law

While we may request that colleagues work overtime in certain instances to fulfil business needs, we also understand that individuals do so on a voluntary basis. We consider the hours worked, and the frequency of overtime requests for individual colleagues and for the workforce as a whole. If overtime requirements become regular, we look to expand the working capacity by hiring additional staff.

## What we expect of you

- Be familiar with, and comply with, the policies listed under Resources and contacts
- Raise due diligence requests for any new third parties in line with the Ethical due diligence guide
- Look for obvious signs of human rights abuses such as modern slavery, on our own sites and when visiting third-party sites

Please discuss with your local HR team any concerns related to the following:

- Diversity and equality
- Dignity at work
- Fair pay and benefits
- Working hours
- Collective bargaining and freedom of association issues



Immediately report any concerns related to suspected human rights abuses to Group Business Ethics. You can also use the external Speak Up service or, if you're based in the UK, call the 'Modern Slavery and Exploitation Helpline' on **0800 0121 700** for advice.

## FAQs

**Q: I witnessed obvious signs of modern slavery while visiting the premises of a third party. What should I do?**

**A:** There are many signs to look out for with regards to forced labour or modern slavery. Any one factor, or a combination of factors, could suggest a person's a potential victim.

Report your concerns to the Group Business Ethics team rather than getting directly involved. If it transpires that modern slavery is occurring, we'll make sure that the appropriate course of action is taken to protect the victim.

**Q: I am exploring working with a third party who operates in a country considered high risk for modern slavery, what should I do?**

**A:** Consult the Ethical Due Diligence guide and raise a request for ethical due diligence on the third party, as per the instructions provided



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking [here](#).



## 5.7

## Collective bargaining and freedom of association

### Principle

We believe that the decision to join a trade union is an individual choice.

The right to collective bargaining allows colleagues to freely negotiate their working conditions with their employers. Freedom of association is the right of colleagues to form and/or join trade unions or organisations of their choosing.

These rights apply to all colleagues, and we uphold them at Drax:

- We have an open attitude towards the activities of trade unions
- We don't discriminate against workers' representatives, and we give them access to carry out their functions in the workplace
- We allow alternate forms of worker representation in situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations
  - The principles of freedom of association and collective bargaining are set out in International Labour Organisation conventions
  - They also form a principle of the UN Global Compact, of which Drax is a participant

### What you need to do

- Report any suspicions of a restriction on the right to collective bargaining and freedom of association to a colleague in your local HR team

### FAQs

**Q:** I suspect that a restriction has been placed on the right to collective bargaining at another Drax location – what should I do?

**A:** You should discuss the matter with a local HR representative.

**Q:** Why is freedom of association important for Drax?

**A:** It's the right thing to do and potentially of benefit to our colleagues. Promoting and respecting freedom of association can also result in a positive business environment. This can include better economic competitiveness, quick and easy dispute resolution, skills development and health and safety improvements.

**Q:** What constitutes a detriment on union membership grounds?

**A:** Penalising a colleague for - or preventing them from - becoming or trying to become a member of a trade union or for making use of a trade union's services. It would also be a detriment to penalise a colleague for - or prevent or deter them from - taking part in the activities of a trade union at an appropriate time



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.

## 5.8

## Privacy and protection

### Principle

We act responsibly when gathering, processing and sharing personal data to make sure individuals' privacy rights are protected.

We comply with the requirements of global data protection laws and respect individuals' privacy rights.

These laws require that we make sure individuals can exercise their rights in relation to their own personal information. We maintain policies, processes and systems to safeguard the privacy of individuals and protect their personal information as if it were our own. If personal information is accidentally or deliberately destroyed, lost, altered, disclosed or accessed, we may need to report it to the relevant regulator within a very short timeframe.

We also make sure that any third parties that process personal information on our behalf do the same. We take extra care when processing sensitive information, including racial and ethnic origin, political opinions, religious and philosophical beliefs, a person's sex life or orientation, health information, criminal records and trade union membership.

If our colleagues don't follow the relevant laws, we could be subject to legal proceedings. Breaches of the law could also damage our reputation or commercial interests, and any involved directors could be prosecuted or disqualified from holding office. There could also be personal criminal consequences if colleagues wilfully or recklessly break the law.

### What you need to do

- Respect the rights of individuals whose personal information you process
- Only create, save, process, hold, disclose and transfer personal information in line with our security and data protection policies: 'respect and protect'
- Don't access or disclose personal information to anyone inside or outside Drax, unless in line with both applicable laws and our company policies



Immediately report a breach to the Data Protection team



Watch "Privacy and protection" video by clicking here

privacy and  
protection



## FAQs

**Q: A company we're starting to work with wants the email addresses of all our customers so it can send them a brochure. Is this OK?**

**A:** No - you shouldn't send this information to the third party, as it would be contrary to our Code of Conduct, may break national laws, and could subject Drax and/or you to legal action.

**Q: My work colleague is accessing personal information without authorisation. What should I do?**

**A:** If you know that someone – a colleague, contractor, or anyone else – has access to information that they shouldn't be looking at, raise the concern immediately. Either speak to your line manager or the Data Protection team. Alternatively, raise your concerns via the Self-Service Portal or via one of our 'Speak up' channels (see section 1.7).

**Q: Apart from raising concerns, what else should I use the Self-Service Portal for?**

**A:** You should use the portal for privacy and protection issues including:

- Reporting an incident
- Escalating an individual rights request
- Requesting data protection due diligence on a third party
- Seeking advice and guidance
- Conducting an impact assessment

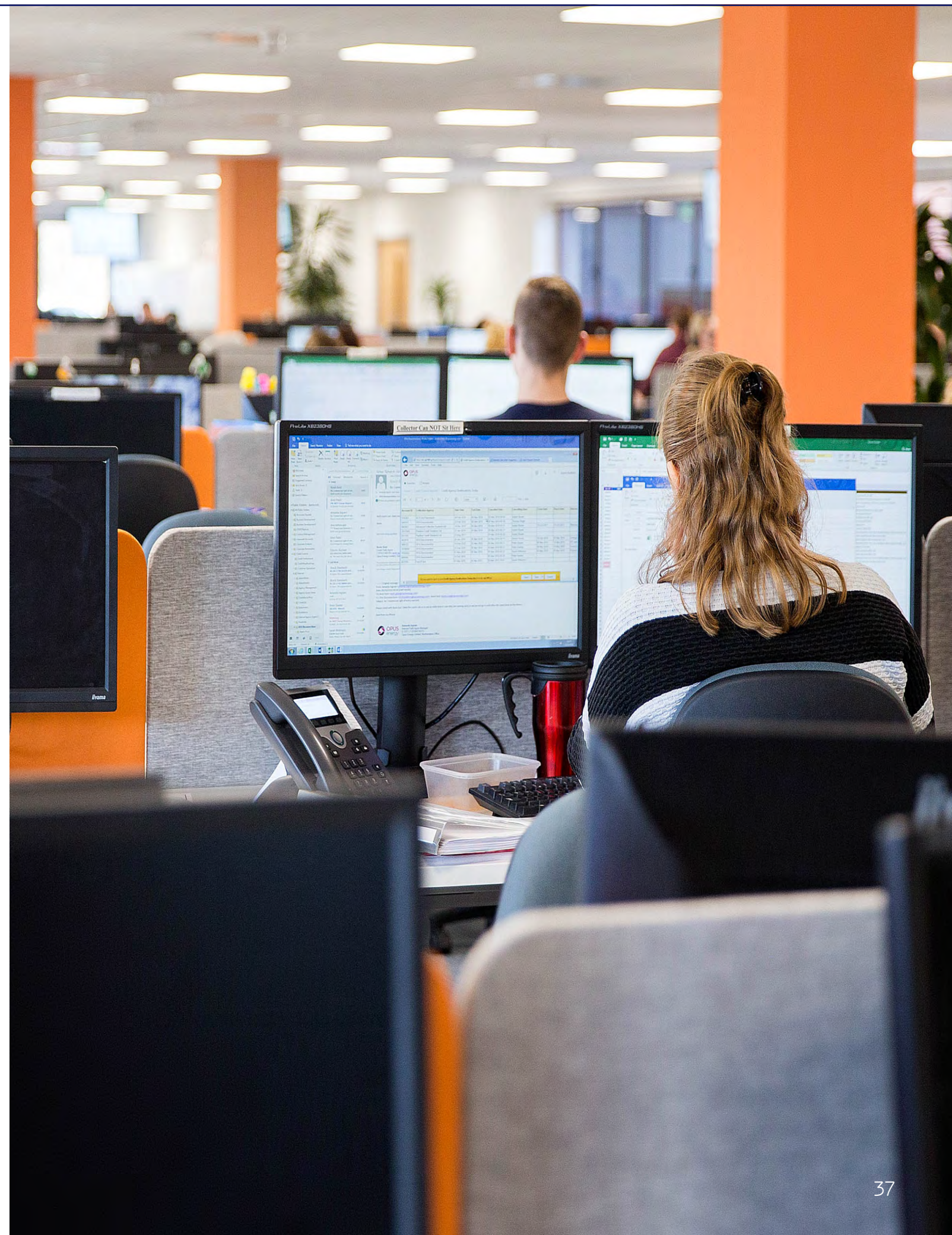
**Q: What's the difference between security and personal data privacy?**

**A:** It's best to see security as the 'lock' that makes sure personal data is kept secure. Privacy is the 'key' to that lock. It makes sure that personal data is only used:

- For lawful purposes
- In a manner that makes sure the rights and freedoms of individuals are respected and protected



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking [here](#).





## 5.9

# Data security and management

### Principle

We ensure appropriate protection and handling of data.

Information security is everyone's responsibility. It can affect us all, both in our work and personal lives. Being vigilant and following best practice helps us protect ourselves and Drax.

To help protect Drax from threats, we configure our processes, systems and assets (e.g. laptops) with security controls built in. You shouldn't reconfigure these measures unless you're specifically authorised to change them.

### What you need to do

- Familiarise yourself with the Acceptable Use Policy and follow its guidance
- Don't change configured IT settings or affect company processes, including:
  - Turning off personal firewalls or anti-virus software
  - Installing unauthorised software
  - Reconfiguring software settings
  - Turning off software updates and patches
  - Changing or attempting to anonymise user settings, as this could affect our ability to respond to cyber attacks
  - Allowing third parties to remotely control our systems or to install software
  - Using unauthorised file-sharing sites
  - Adding any Drax information to your personal email

- Don't act, access, process or publish in a way that might harm the company's reputation, or in a way that contradicts:
  - Our values and principles
  - Our Security Policy
  - Any applicable laws, including those relating to copyright and trademarks
- Make sure you create complex, difficult-to-guess passwords and protect them
- Report incidents (e.g. loss of equipment) and suspicious activity (e.g. phishing emails) to the IT service desk via the Self-Service Portal. Alternatively, use the 'Report Message' tab from the top menu in Outlook
- Only use work equipment (including portable storage devices) for its intended purpose

In terms of information you become party to while working for Drax:

- Only use it for the benefit of Drax
- Make sure you store it safely
- Don't share or publish it without permission
- Delete it once you no longer need it



Check you're sharing the right information with the right person before sending emails or other communications.



## FAQs

**Q:** I sometimes chat to work colleagues on social media about my work at Drax. That's OK, isn't it?

**A:** No – only use Drax-approved systems to discuss work. Don't share confidential information (such as commercially sensitive information or Drax-controlled personal data) online, or make comments/posts that could damage our brand reputation.

If you're using social media to comment on something the company has an interest in, make it clear (e.g. by including a line in your Twitter bio information) it's your opinion and that you're not speaking on behalf of Drax.

**Q:** Can I use my personal device to access Drax systems?

**A:** You're allowed access on your personal device(s) to Drax-managed Microsoft Office 365 applications (e.g. Outlook for emails, Teams) since they're protected by Office 365 security measures. All other use of personal devices is by exception and needs approval by IT. Whichever device you're using, you should abide by our Security Policy. Your local IT service desk can help you get set up – you'll find their contact details in the 'Resources and contacts' section.



**For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.**





## 5.10

## Confidentiality

### Principle

We keep business information confidential, and never use it for personal gain or in a way that could harm Drax.

As a Drax colleague or non-permanent worker, you'll have access to information about Drax and our companies, people, locations, suppliers, customers and business partners. While some of that information will be publicly available, some will be confidential and require protection. Protecting confidential information is everyone's responsibility at Drax.

'Confidential information' means any information or material belonging to Drax or in its possession. It can also be information that you only know because you're a Drax colleague. Confidential information might be spoken, appear in writing, or take another form.

It can relate to Drax:

- Financial information, business plans, projections and strategies
- Property, business practices, relationships, processes, systems and methods of operation
- Specifications, pricing policies, marketing plans and costs
- Customer, supplier or employee information or agreements
- Technical information, inventions, innovations, improvements, know-how, trade secrets and other proprietary information

Misuse of Drax confidential information can have serious consequences, so only share it internally and when absolutely necessary.

Only disclose confidential information to a third party with appropriate authorisation and use secure communications. Treat confidential information belonging to customers or other third parties in the same way.

### What you need to do

- Don't seek to receive other parties' confidential information unless authorised
- Don't copy or share confidential material (including software) unless authorised
- Don't seek access to classified materials unless required for business purposes
- When other parties provide us with documents in confidence, keep them secure and protected using appropriate Drax systems
- Don't share commercially sensitive information about a customer, supplier, joint venture or other business partner without their permission
- Make sure you're sending the right information to the right recipients when emailing or sharing via other channels
- Don't leave sensitive information unattended (e.g. lock the screen on your computer whenever you're leaving it unattended)
- Avoid discussing confidential information in public spaces
- Avoid openly working with confidential information in public spaces

### FAQs

**Q:** During a meeting with a customer, they place a file of information in front of me that may contain a competitor's information and then leave the room. Can I open this file and read the information?

**A:** Don't open the file or read the information. When the customer returns, you should confirm that you haven't looked at it.



**For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking [here](#).**



## 5.11

## Use of Drax resources

### Principle

We use our assets and resources carefully, efficiently and for the benefit of Drax.

We protect valuable technology, intellectual property and commercially sensitive information from unauthorised use and disclosure.

We take individual responsibility for the care of property – including IT systems, materials, facilities, budgets and equipment – belonging to Drax and to our customers. We recognise that you may use work equipment and office spaces for limited personal use, but expect that you:

- Use your work details (like your email address) for work activities and personal details for personal activities
- Keep your personal web and email activity separate to your Drax work
- Keep use of personal web access, phones and email to a minimum, and never let it get in the way of your work
- Don't engage in personal political activities in work time, or use Drax resources without authorisation
- Don't use Drax property for anything illegal or in ways that might reflect badly on the company
- Recognise that Drax needs to reserve the right to log and monitor activity on its network and systems, which could mean that records of your personal use are accessible if an investigation is required



For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.

### What you need to do

- Minimise the use of Drax assets for personal purposes
- Look after the Drax assets provided to you (e.g. passwords, laptop, phone)
- Only access and use information that you genuinely need for work purposes
- Don't use, sell, transfer or dispose of Drax business assets for personal gain

### FAQs

**Q:** I have a Drax laptop. Are there any restrictions on using it to access the internet at home and in my own time?

**A:** Yes. Our information systems exist for the purpose of conducting Drax business. While we accept a minimal amount of personal use, it shouldn't affect your performance or that of your colleagues, harm the company's reputation or interfere with the business. Using company hardware to access illegal, offensive or inappropriate material is unacceptable. Nobody other than you should use your equipment when it's in your care.



Watch "Use of Drax resources" video by clicking here

use of Drax  
resources

## 5.12

## Keeping accurate business records

### Principle

We make sure that our reporting is complete and accurate.

We aim to keep our financial and other records complete, accurate and filed safely. These records include:

- Contracts
- Payroll
- Expense reports
- Emails
- Accounting and financial data
- Measurement and performance records
- Electronic data files

We're all responsible for recording company information accurately and for retaining and disposing of company records according to our policies. In this way, we can help to:

- Protect Drax resources
- Meet the expectations of customers, investors and suppliers
- Make sure information's easily accessible for as long as it's needed

Falsifying Drax records in any way – or destroying, altering or withholding them – is a serious offence and may result in prosecution. If you think there's an inaccuracy in our books, reports or invoices, or a weakness in our accounting systems, report it to the Finance team. Alternatively, raise it via one of our 'Speak up' channels (see section 1.7).

Even unintentional mistakes in our financial records, reports, invoices – or anything else that affects our external reporting – could be against the law. So, we're keen to avoid any inaccuracies.

### What you need to do

- Record all expenditure and transactions, or any other aspect of Drax business, accurately and on time
- Claim expenses and book business travel and accommodation in line with the Travel and Expense policy; ask if you're unsure
- Take extra care to be accurate when making – or storing – business or statutory records
- Preserve business documents and records in accordance with our Records Retention and Destruction Standard
- Don't do anything that would compromise the accuracy or integrity of our business records, reports, products or services



Report inaccuracies in our records that are outside of your control to the Finance team, or via one of our 'Speak up' channels (see section 1.7.2)

### FAQs

**Q:** My manager has asked me to move some costs to another department, which is showing an underspend, so that our department isn't seen as over-budget. Is that OK?

**A:** No – you'd be artificially manipulating the results. Moving costs between departments or businesses is only justifiable when there's a valid reason, such as the provision of a service from one area to the other.



**For more information and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking [here](#).**



## 5.13

## Media and communications

### Principle

We make sure that any information we share is accurate and appropriate; we engage the External Communications team when required.

Our reputation as Drax is incredibly important to us. We build, protect and maintain it by making sure we behave in a manner that reflects positively on the Drax brand.

What appears in news coverage and social media, as well as what we say and do, helps to build (or diminish) our reputation. Therefore, we assist the news media in understanding our business, and make sure the information we provide is accurate.

The External Affairs team is responsible for managing relevant policy and external relationships, and for communicating via our websites and on social media.

Drax recognises that colleagues may wish to use their devices and communication channels to publish material on the internet and social media. You should do this in a manner that's consistent with both your contract of employment and our Acceptable use policy.

If you have a complaint to make about a colleague or workplace matter, don't communicate it via social media. Instead, raise it in line with your local grievance procedure or according to the processes described in 'Speaking up' (section 1.7).

Please note that we encourage colleagues to promote social media content from Drax (e.g. by sharing its Twitter, Facebook, LinkedIn and Instagram posts). When doing so, please follow the social media guidance in our 'Acceptable use' policy.

### What you need to do

- Always act in a way that protects or enhances the Drax brand and our reputation
- Use care and good judgement when speaking about Drax or our people, including when outside of work
- Don't use social media to post or display information about Drax and its stakeholders that's vulgar, obscene, threatening, intimidating, harassing, libellous or discriminatory
- Get authorisation from the Media team before speaking to the news media about Drax business activities
- Get authorisation from the Investor Relations team and/or the Group Company Secretary before speaking to members of the investment community about Drax business activities
- Keep confidential all sensitive information about Drax



Watch "Media and communications" video by clicking here



media and  
communication



## FAQs

**Q: What counts as sensitive information?**

**A:** This is any information relating to Drax or our colleagues, customers, contractors or suppliers that's not already in the public domain. If in doubt, please check with the Company Secretarial team.

Because Drax is a listed company, it's critical that you don't share sensitive information or publicly comment on legal issues, share prices, financial performance, forecasts, strategy or rumours.

**Q: What should I do if a journalist questions me about Drax activities or the Drax position on an issue?**

**A:** Refer all queries from journalists to the Media team, so they can decide how to proceed.

**Q: Some of my colleagues are using Facebook to make derogatory comments about people in their team, both inside and outside working hours. What should I do?**

**A:** This is unacceptable behaviour and you should tell your line manager, supplier (if you're a non-permanent worker), or the Group Business Ethics team as soon as possible. You can also raise it via one of our 'Speak up' channels (see section 2.3). Where possible, you should provide evidence of the comments (e.g. a screenshot).



**For more information** and details of relevant tools and who to speak to, head to the [Resources and contacts](#) section, by clicking here.





# 6

## Resources and contacts

Details for more information, relevant tools and who to speak to by individual code.  
You can find the latest versions of listed policies by searching the Group Intranet’s ‘Policies’ section using the titles shown in the ‘For more information’ column.



Individual code	For more information refer to	Relevant tools	Who to speak to
2.1 Speaking up	<ul style="list-style-type: none"><li>• Speak Up (whistleblowing) policy</li><li>• Speak Up guidance for managers</li><li>• Speak Up guidance for reporters</li></ul>	<a href="#">How to report concerns SharePoint page</a>	Business Ethics team and/or Whistleblowing Officer
Our place in the world			
3.1 Environment	<ul style="list-style-type: none"><li>• Environment Policy</li><li>• Sustainability Policy Statement</li></ul>	<ul style="list-style-type: none"><li>• Our Health, Safety, Environment &amp; Quality (HSEQ) platform, SAI360 <a href="#">SAI360 SharePoint pages</a></li></ul>	For help or support, speak to a local Environment colleague or the Generation HSE Director
3.2 Positive social impact	<ul style="list-style-type: none"><li>• Community and Charity Policy</li></ul>	<a href="#">Community and Charity Hub (SharePoint)</a>	<p>For help or support, speak to the Group Director of Sustainability.</p> <p>Forward requests from members of the community to <a href="mailto:communityandcharity@drax.com">communityandcharity@drax.com</a>, and raise concerns with your line manager or Group Business Ethics.</p>





Individual code	For more information	Relevant tools	Who to speak to
Working together			
<b>4.1</b> <b>Safety, health and wellbeing</b>	<ul style="list-style-type: none"> <li>• Safety, Health and Wellbeing Policies</li> <li>• Process Safety Policy</li> <li>• Drug and Alcohol Policies (local)</li> <li>• Health and Safety Golden Rules (Biomass, Customers, Generation)</li> </ul>	Our Health, Safety, Environment & Quality (HSEQ) platform, SAI360 <a href="#">SAI360 SharePoint pages</a>	For help or support about health, safety or wellbeing, speak to a local Health and Safety colleague, the Generation HSE Director or call the relevant helpline: <ul style="list-style-type: none"> <li>• Employee Assistance Programme helpline (UK) – 0800 316 9337</li> <li>• Life Assistance Program helpline (US) – 800-538-3543</li> <li>• Liberty Mutual (Pinnacle US) – 877-695-2789</li> <li>• Humana Care (Pinnacle Canada) – 1-800-661-8193</li> </ul>
<b>4.2</b> <b>Diversity equity &amp; inclusion</b>	<ul style="list-style-type: none"> <li>• Diversity, Equity and Inclusion Policy</li> </ul>	Search 'Diversity' in the 'One Drax playlist' for additional eLearning	For help or support, speak to a colleague in your local HR team or call the relevant helpline: <ul style="list-style-type: none"> <li>• Employee Assistance Programme helpline (UK) – 0800 316 9337</li> <li>• Life Assistance Program helpline (US) – 800-538-3543</li> <li>• Liberty Mutual (Pinnacle US) – 877-695-2789</li> <li>• Humana Care (Pinnacle Canada) – 1-800-661-8193</li> </ul>
<b>4.3</b> <b>Dignity at work</b>	<ul style="list-style-type: none"> <li>• Dignity at Work Policy</li> </ul>	Search 'Unconscious Bias' in the 'One Drax playlist' for additional eLearning	For help or support, speak to a colleague in your local HR team, use our external Speak Up service or call the relevant helpline: <ul style="list-style-type: none"> <li>• Employee Assistance Programme helpline (UK) – 0800 316 9337</li> <li>• Life Assistance Program helpline (US) – 800-538-3543</li> <li>• Liberty Mutual (Pinnacle US) – 877-695-2789</li> <li>• Humana Care (Pinnacle Canada) – 1-800-661-8193</li> </ul>

Individual code	For more information	Relevant tools	Who to speak to
Conducting our business			
<b>5.1</b> <b>Anti-bribery and corruption (including conflicts of interest)</b>	<ul style="list-style-type: none"> <li>• Anti-Bribery and Corruption (Including Conflicts of Interest) Policy</li> <li>• Political Engagement Policy</li> <li>• Community and Charity Policy</li> <li>• Ethical Due Diligence Guide</li> <li>• Third Party Privacy Onboarding Policy</li> <li>• Conflicts of Interest Guide</li> <li>• Conflicts of Interest FAQs</li> <li>• Gifts and Hospitality Guide</li> </ul>	<a href="#">Self-Service Portal</a> <a href="#">Group Business Ethics SharePoint site</a> <a href="#">Group Privacy SharePoint site</a>	For general help or support, contact a colleague in the Group Business Ethics team. For help and support specifically relating to dealing with public officials, speak to a colleague in the External Affairs team
<b>5.2</b> <b>Financial crime</b>	<ul style="list-style-type: none"> <li>• Anti-Fraud Policy</li> <li>• Ethical Due Diligence guide</li> </ul>	<a href="#">Group Business Ethics SharePoint site</a>	For help or support, contact a colleague in the Group Business Ethics team. To report suspicions of financial crime including money laundering, contact the Group Company Secretary or use the 'Speaking up' channels
<b>5.3</b> <b>Fair competition</b>	<ul style="list-style-type: none"> <li>• Fair Competition Policy</li> <li>• Fair Competition Guide</li> <li>• Fair Competition Do's and Don'ts</li> </ul>	<a href="#">Group Business Ethics SharePoint site</a>	For help or support, call a colleague in the Group Legal or Group Business Ethics teams or contact the external Speak Up service
<b>5.4</b> <b>Treating customers fairly</b>	<ul style="list-style-type: none"> <li>• Standards of Conduct (Customers) Policy</li> <li>• Privacy Policy</li> <li>• Customers Privacy Notice</li> <li>• Crime Data and Special Category Personal Data (UK) Policy</li> </ul>	<a href="#">Self-Service Portal</a> <a href="#">Group Privacy SharePoint site</a>	For general help or support, speak to a colleague in the Regulation and Compliance team. For help or support related to privacy issues, speak to a colleague in the Data Protection team



Individual code	For more information	Relevant tools	Who to speak to
<b>5.5</b> <b>Market abuse</b>	<ul style="list-style-type: none"> <li>• Market Abuse (Drax shares) - Group-wide Dealing Code</li> <li>• Market Abuse (Drax shares) - Disclosure and Information Management Policy</li> <li>• Market Abuse (Drax shares) - Group-wide Dealing Policy</li> <li>• Market Abuse (Drax shares) - Overview for PDMRs</li> <li>• Market Abuse Regulation (Wholesale Market) Policy</li> <li>• REMIT Policy and Procedures</li> </ul>	<a href="#">Ofgem website</a> <a href="#">FCA website</a> <a href="#">Company Secretarial SharePoint site</a>	<p>For help or support about share-dealing matters, contact the Group Company Secretary.</p> <p>For help or support about commodity-trading compliance, contact a colleague in the Wholesale Market Compliance team</p>
<b>5.6</b> <b>Human and labour rights</b>	<ul style="list-style-type: none"> <li>• Human Rights Policy</li> <li>• Dignity at Work Policy</li> <li>• Diversity, Equity and Inclusion Policy</li> <li>• Privacy Policy</li> <li>• Ethical Due Diligence Guide</li> </ul>	<a href="#">Group Business Ethics SharePoint site</a> <a href="#">HR SharePoint site</a>	<p>For help or support, speak to a colleague in the Group Business Ethics team or your local HR team, use the external Speak Up service, or call the relevant helpline:</p> <ul style="list-style-type: none"> <li>• Employee Assistance Programme helpline (UK) – 0800 316 9337</li> <li>• Life Assistance Program helpline (US) – 800-538-3543</li> <li>• Liberty Mutual (Pinnacle US) – 877-695-2789</li> <li>• Humana Care (Pinnacle Canada) – 1-800-661-8193</li> </ul>
<b>5.7</b> <b>Collective bargaining and freedom of association</b>	<ul style="list-style-type: none"> <li>• Human Rights Policy</li> </ul>	<a href="#">Group Business Ethics SharePoint site</a>	<p>For guidance on UK-based modern slavery concerns, call the Modern Slavery and Exploitation Helpline on 0800 0121 700.</p>
<b>5.8</b> <b>Privacy and protection</b>	<ul style="list-style-type: none"> <li>• Privacy Policy</li> <li>• Privacy Guide (UK)</li> <li>• Personal Data Breach Policy</li> <li>• Third Party Privacy Onboarding Policy</li> <li>• Colleague Data Handling Policy</li> <li>• Crime Data and Special Category Personal Data (UK) Policy</li> </ul>	<a href="#">Group Privacy SharePoint site</a> Data privacy emergency/major incident contact numbers listed on <a href="#">Self-Service Portal</a> for reporting.	<p>For help or support, speak to the Data Protection team</p>

Individual code	For more information	Relevant tools	Who to speak to
<b>5.9</b> <b>Data security and management</b>	<ul style="list-style-type: none"> <li>• Personal Data Breach Plan (UK)</li> <li>• Personal Data Records Retention and Destruction Policy</li> </ul>	<a href="#">Self-Service Portal</a> <a href="#">Group Information Security SharePoint site</a>	<p>For support setting up personal devices, contact your local IT service desk via the Self-Service Portal.</p> <p>For help or more information, speak to a colleague in the Group Security team</p>
<b>5.10</b> <b>Confidentiality</b>	<ul style="list-style-type: none"> <li>• Security Policy</li> </ul>	<a href="#">Self-Service Portal</a> <a href="#">Security SharePoint site</a> <a href="#">Group Privacy SharePoint site</a> <a href="#">Group Business Ethics SharePoint site</a>	<p>For help or support, speak to a colleague in the Group Security or Group Business Ethics teams</p>
<b>5.11</b> <b>Use of Drax Resources</b>	<ul style="list-style-type: none"> <li>• Security Policy</li> <li>• Acceptable Use Policy</li> </ul>	<a href="#">Security SharePoint site</a>	<p>For help or support, speak to a colleague in the Group Security team</p>
<b>5.12</b> <b>Keeping accurate business records</b>	<ul style="list-style-type: none"> <li>• Travel and Expense Policy</li> <li>• Anti-Fraud Policy</li> <li>• Corporate Criminal Offences (Anti-Facilitation of Tax Evasion) Policy</li> <li>• Financial and Trade Sanctions Policy</li> <li>• Personal Data Records Retention and Destruction Policy</li> <li>• Data Retention, Destruction and Archive Standard</li> </ul>	<a href="#">Security SharePoint site</a>	<p>For help or support, speak to a colleague in the Group Security team</p>
<b>5.13</b> <b>Media and communications</b>	<ul style="list-style-type: none"> <li>• Market Abuse (Drax shares) Disclosure and Information Management Policy</li> <li>• Acceptable Use Policy</li> </ul>		<p>For help or support, speak to a colleague in the Media or External Affairs teams or to a local HR colleague.</p>