

BRIBERY ACT 2010: ANTI-BRIBERY POLICY

PURPOSE

This Policy sets out Anglian Water Group's Policy in relation to bribery and confirms our commitment to compliance with our legal obligations under the Bribery Act 2010. The policy is supported by a number of other policies (referred to below) which govern specific activities where there is a greater risk of bribery.

SCOPE

This policy applies to all Group employees.

All people or businesses who carry out work or perform services on behalf of the AWG Group (which will include our partners, agents and contractors) are required to comply with anti-bribery laws and required to maintain adequate procedures to prevent bribery.

STATUS

Company policy

RESPONSIBILITY

It is the responsibility of:

- the Group Legal Director to review this Policy from time to time and to present any material changes or revisions to the policy to the Board of Anglian Water Services for its approval.
- each business unit leader to ensure compliance with this Policy within their business unit and periodically arrange for all employees within that business unit and all partners, agents and contractors with which that business unit has dealings to be reminded of the Policy and notified of any revisions.
- the Chairman of the Risk and Compliance Committee from time to time to assess the risk of bribery across the Group and to monitor and review the effectiveness of the measures and procedures which have been put in place to prevent bribery occurring.
- the Audit Committee to review the effectiveness of the measures and procedures which have been put in place to prevent bribery occurring.

TOP LEVEL COMMITMENT

Anglian Water Group believes in carrying out business fairly, honestly and openly and expects all employees, partners, agents and contractors to adopt a high standard of business ethics. All directors and senior managers of Anglian Water are fully committed to preventing bribery being committed by any employee, person or business who carries out work or performs services on behalf of the Group (including any subsidiary or associate company within the Group).

BRIBERY ACT 2010: ANTI-BRIBERY POLICY

POLICY

Anglian Water Group has a zero tolerance of bribery and corruption. Anglian Water Group will not permit or condone any form of bribery regardless of whether it takes place directly or through third parties. This policy extends to all of the Group's business dealings and transactions in all countries in which it or its subsidiaries and associates operate. The policy also extends to the prohibition of bribes which are intended to benefit an employee's family, friends, associates or acquaintances.

The Group prohibits:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

to or from

- any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

- any individual employee, agent or other person or body acting on the Group's behalf

in order to

- gain any commercial, contractual or regulatory advantage for the Group in a way which is unethical

OR in order to

- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

FACILITATION PAYMENTS

Facilitation payments are small payments made to secure or speed up routine actions, usually by public officials, such as issuing permits. Anglian Water Group prohibits 'facilitation' or 'grease' payments as these are bribes. It is also our policy to try to ensure that our agents and third parties working for us (including contractors and suppliers do not make facilitation payments on our behalf). If you have doubts about a payment and suspect that it might be considered a facilitation payment, only make the payment if the official or third party can provide a formal receipt or written confirmation of its legality. If practicable, obtain senior management approval for the payment.

WHAT ARE THE CONSEQUENCES OF BRIBERY?

Bribery can lead to heavy fines against the company as well as personal liability for directors, senior managers and individuals who are directly or indirectly involved.

BRIBERY ACT 2010: ANTI-BRIBERY POLICY

In particular, if an employee, partner, agent or contractor bribes another person intending to obtain or retain business or any other advantage for a company within the Anglian Water Group, AWG will itself have committed an offence unless it can prove that it has in place adequate procedures designed to prevent employees, partners, agents and contractors from committing bribery on its behalf.

Where we reasonably believe an incident of bribery has occurred it will be reported to the Police.

Disciplinary action will be taken against any employee who is directly, or indirectly, involved in bribery.

Consideration will also be given to the termination of any contract with any partner, agent or contractor involved in bribery or which fails to have in place adequate procedures designed to prevent its employees, partners, agents and contractors from committing bribery on its behalf.

WHAT ACTION SHOULD I TAKE IF I SUSPECT BRIBERY

If you suspect that you or someone else has been offered a bribe, you should either inform your Line Manager or, if you suspect that your Line Manager may be involved in bribery, a Senior Manager. If you do not feel that your concerns have been adequately addressed, you should raise them with a designated person in accordance with our Whistleblowing policy.

SPECIFIC POLICIES

Employees should note and comply with the following policies which support the Group's policy of preventing bribery:

(a) Corporate Hospitality Policy and Guidelines

This applies to any gift or hospitality which you may be offered by a third party in connection with, or as a result of your, employment. The Corporate Hospitality Policy and Guidelines can be accessed on Lighthouse or obtained from HR and provides further guidance on what you should do if you are offered (or wish to offer) Gifts or Corporate Hospitality. No Gift or Corporate hospitality should ever be given or accepted if it is intended to secure or reward the grant of a contract or other business advantage.

(b) Charitable or Political Donations and Sponsorship

No donation should be made on behalf of an Anglian Water Group company, or using your employer's money, to a charity or political party and no sponsorship should be given to any person or cause on behalf of the company without the approval of the head of your business unit. Please refer to the Charitable and Political Donations policy for further information.

(c) Procurement Policy

All contracts for goods and services must be let in accordance with our Procurement Policy and, where appropriate, in accordance with the Utilities (Contracts) Regulations.

BRIBERY ACT 2010: ANTI-BRIBERY POLICY

and all other legislation regarding contracts and procurement by utilities within Europe

(d) Expenses Policy

All expenses claims must be made, and authorised, in accordance with the applicable Expenses Policy.

(e) Whistle Blowing Policy and Procedure

This sets out our Policy and Procedure for reporting misconduct (including bribery) by Anglian Water. The policy is in accordance with the Public Interest Disclosure Act 1998 which provides protection against victimisation or dismissal for workers who blow the whistle on criminal behaviour or other wrongdoing.

Training

All business units are risk assessed for Anti-Bribery risk by the Group Legal Director. Unless an exemption is agreed with the Group Legal Director, employees (including temporary employees) in low risk business units must complete training on Anti-Bribery every 3 years, employees in medium risk business units must complete training on Anti-Bribery every 2 years and employees in high risk business units must complete training on Anti-Bribery annually.

Induction

All new starters, unless exemption is gained from the Group Legal Director, must complete the e-learning module on Anti-Bribery

LAST REVIEWED

This Policy was reviewed by the Group Legal Director on 22 September 2021 and no substantive changes were made.

See also: <https://anglianwater.sharepoint.com/sites/pubLegal/SitePages/Anti-bribery-and-corruption-advice.aspx>