

## 1. Code of Conduct

One of the principles that we work by every day is that we **behave ethically**. We act honestly, openly and responsibly so that we are trusted. We uphold the Affinity Way together by complying with the law and regulatory requirements.

This Anti Bribery and Corruption Policy is intended to help protect you and Affinity Water by explaining what behaviour is acceptable and what to do if you have concerns.

## 2. Anti Bribery and Corruption Policy

### Our commitment

We take a zero-tolerance approach to bribery and corruption - offering or accepting a bribe is not acceptable in any circumstances.

We will support you to carry out your job professionally, fairly and ethically and to act with integrity in your business dealings and relationships.

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. We only make charitable donations that are legal and ethical. Donations and sponsorship may only be offered or made on our behalf through our Community Engagement Fund.

We will uphold all UK laws relevant to countering bribery and corruption, including the Bribery Act 2010.

We are committed to implementing and enforcing effective systems, and to supporting you to take steps, to counter bribery and corruption.

We will bring disciplinary action against and, if necessary, dismiss any employee who breaches this policy in addition to any prosecution. And we will terminate our contractual relationship with other workers and third parties if they breach this policy.

### Why does it matter?

- You could go to prison - bribery and corruption are punishable for individuals by up to ten years' imprisonment
- You could lose your job – and we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation - if we take part in corruption or have inadequate anti-corruption procedures
- Just one act of dishonesty, or the suspicion of it, could damage our credibility, our credit rating, our working relationships, our future

### Your role

If you work for or with us we expect you to:

**Ensure** that you read, understand and comply with this policy (and the further guidance referred to) and take time to think about how your job might expose you to any risk of corrupt behaviour.

**Avoid** any activity that might lead to, or suggest, a breach of this policy.

Take reasonable steps to **prevent and detect** bribery and other forms of corruption according to the nature of your role.

**Report** any improper behaviour or suspicious activity to your manager or to the Legal or Internal Audit teams as soon as possible – you may wish to do this following our [Whistleblowing Policy](#).

You are personally accountable for your own actions. You should:

- declare offers of gifts and hospitality as required by this policy
- never offer or accept gifts of cash or cash equivalents
- never feel compelled or permitted to become involved in corrupt activities;
- remember to use your good judgment and common sense;
- take personal responsibility for acting within the law;
- never sacrifice or put at risk your or Affinity Water's good name or your personal freedom;

### Working with suppliers and contractors

If your role involves dealing with third parties (such as suppliers or contractors) we expect you to:

**Communicate** our zero-tolerance approach to bribery and corruption at the outset of business relationships with them.

**Perform** due diligence on the third party before you enter into a contract or arrangement with them. You should contact the Legal team to assist with obtaining contractual warranties in relation to the third party's compliance with bribery and anti-corruption laws.

### Your manager's role

Your manager is responsible for:

**Ensuring** that you are made aware of and understand this policy and are given adequate and regular training on it.

**Taking** your concerns seriously and communicating them to the Legal and Assurance team, where appropriate.

## 3. Procedure

If you are offered a bribe or suspect that a third party is attempting to influence you by offering you an inappropriate gift or hospitality, you should decline it, promptly notify the Legal and Assurance team and let your manager know.

The Legal and Assurance team will **assess** any reports of bribery and corruption to determine if it is appropriate that they are investigated. In cases that require **investigation**, you may be required to attend a disciplinary or investigative hearing as a witness. Where appropriate, we will keep you **informed** of the results of the investigation and subsequent actions. However, in certain situations, this may not be possible because this would infringe a duty of confidence owed by us to someone else.

Following investigation, the Director of Legal and Assurance will determine if a report should be made to the appropriate authorities, such as the Serious Fraud Office.

## 4. Gifts and Hospitality

### Accepting a gift or hospitality

Accepting a gift or hospitality as a bribe is not acceptable in any circumstances. If it feels inappropriate, it probably is.

Normal and appropriate gifts and hospitality are acceptable. Receiving cash or cash equivalents (such as vouchers) are not acceptable.

You must disclose any gift or hospitality offered to you, whether accepted or declined, which:

- has a value more than £25; or
- you believe may be intended to (or could be perceived, for whatever reason, as intending to) improperly influence you in any way; or
- could be considered unusual by an outsider or your colleagues when compared to customary gift giving practices in the context of your role with Affinity Water,

You should complete the online [Gift and Hospitality form](#). Declarations will be shared with your manager and will be subject to director review to verify compliance with this policy.

### Offering a gift or hospitality

If you intend to provide corporate hospitality or a corporate gift to a third party you must ensure this is done with the express approval of your director. Offering cash or cash equivalents is never acceptable. All gifts and hospitality offered must also be within the guidelines set by the recipient's organisation. You should confirm in advance with the recipient that the gift or hospitality does not violate the policies of their organisation. This is particularly important where the third party works for a regulator or is a public official. If you are in any doubt, contact the Legal and Assurance team for advice.

Any gift or hospitality provided exceeding £25 per person must be declared by completing the online [Gift and Hospitality form](#).

## 5. Further guidance

A **briefing pack** is available including detailed explanations of bribery, gifts and hospitality, and examples of situations that may cause you to consider your behaviour and make a report.

If you would like guidance or have any concerns please speak to your manager or refer to our Code of Conduct in the first instance. If you need further advice, please consult the Legal and Assurance team, who will help to resolve any issues.

## 6. Responsibility for this policy

The **Board of Directors** has overall responsibility for this policy and ensuring compliance with legal requirements relating to bribery and corruption. The **Chief Executive Officer** is responsible for implementing this policy. The **Audit Committee** is responsible for reviewing and reporting on the effectiveness of Affinity Water's systems and controls for the prevention of bribery and corruption.