

## **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 which govern specific activities where there is a greater risk of bribery.

### **SCOPE**

This policy applies to all Group employees and to 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).

### **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 revisions to the policy to the Board of Anglian Water Group 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).

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### **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.

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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.

Any incident of bribery 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.

### **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 and all other legislation regarding contracts and procurement by utilities within Europe.

### **LAST REVIEWED**

This policy was approved by the AWG Board on 4 April 2011. A copy will be sent by post to all existing and new or potential partners, agents and contractors.