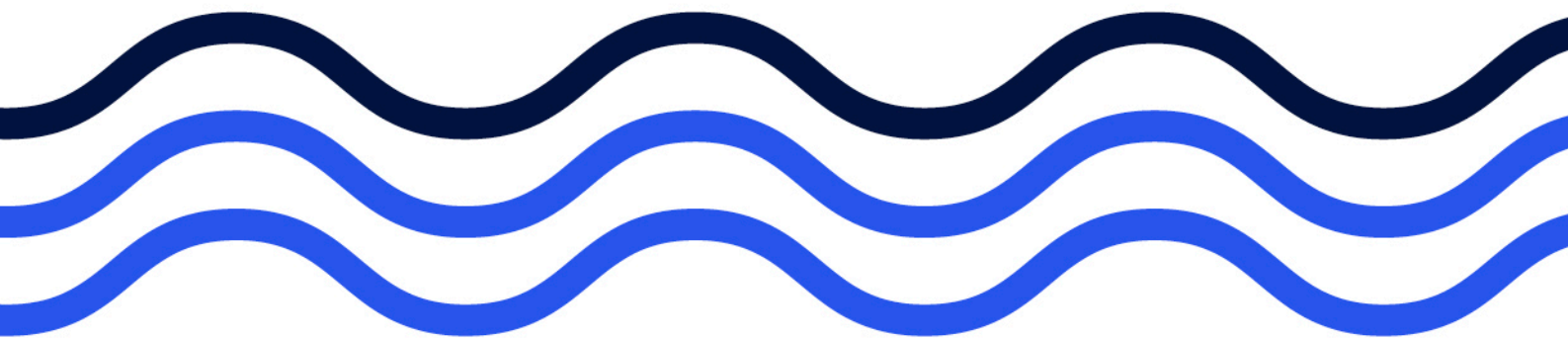


Bribery, Gifts and Hospitality Policy



YorkshireWater

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Business areas affected by this document

This applies to all colleagues, both direct and indirect, when working for a company within the Kelda Holdings group.

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1. Introduction

Yorkshire Water takes a zero tolerance approach to bribery and corruption. We will never, under any circumstances, offer or accept bribes or influence decisions through improper means.

This policy sets out our position in relation to bribery and corruption, along with what to do if you are offered a bribe or become aware of bribery or corruption anywhere in our business.

It also covers our Yorkshire Water policy on gifts and hospitality, setting out what is acceptable and what is not and the process you must follow if you are offered gifts or hospitality.

2. Bribery

We buy all our goods and services in an open and transparent manner. You must never offer a bribe to a third party or colleague or seek to influence their decision through improper means, even if you believe you are doing this for the benefit of Yorkshire Water.

You must also never request or accept a bribe from a third party or colleague in any circumstances, including not accepting gifts from third parties that are too generous. See Section 3 for more information on what is deemed 'too generous'.

All of our suppliers, service providers and partners must be selected and dealt with in a completely impartial manner, without favouritism or preference.

You must never derive personal gain from a transaction involving Yorkshire Water, unless the transaction and the personal interest has been fully disclosed to the Company Secretary and you have received written approval that the transaction can go ahead. For further information on this, please see the Conflicts of Interest Policy [here](#).

Paying, offering, requesting or accepting a bribe is a criminal offence under the Bribery Act 2010 and can result in fines and imprisonment. We will cooperate with the relevant authorities on any investigation into acts of bribery, even if the bribe was alleged to have been in the interests of Yorkshire Water.

What do we mean by "bribery"?

Bribery is when someone tries to persuade someone else to do something for them by offering them money, gifts or something else that they want.

3. Gifts and Hospitality

Gifts and hospitality are sometimes offered or received as part of building business relationships. This can be acceptable but you must take great care not to offer or accept gifts or hospitality that could appear to create an improper advantage for Yorkshire Water or which might be perceived to influence the decisions you are making.

Under no circumstances should cash gifts ever be offered or accepted. Whether or not other gifts or hospitality can be accepted depends on their timing and value:

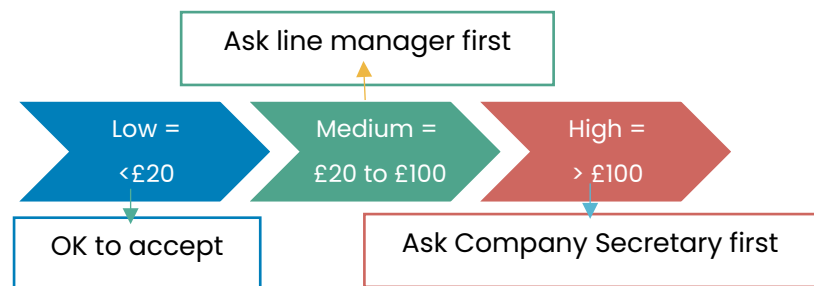
Timing

Gifts and hospitality must never be accepted when the provider is in a competitive tender process with Yorkshire Water or any other group company, or a competitive tender process is due to start in the next three months. This applies to any colleague who is connected with the tender process in any way.

Value

Low Value Gifts or Hospitality

Gifts or hospitality worth less than £20 in value; such as promotional pens, calendars, diaries, a bottle of wine or a sandwich lunch may be accepted.



These do not need to be recorded centrally but some teams may choose to record these for their own records to ensure fairness across the team.

Medium Value Gifts or Hospitality

Gifts or hospitality with a value above £20 but less than £100 must be referred to your line manager. The line manager should only give approval to keep the gift or attend the hospitality if there is a clear business benefit to doing so, such as a free ticket to attend a conference or a business lunch with a current supplier. The line manager should also take into account whether or not the recipient is in a position to influence any decisions that may be made in the future in relation to the provider of the gift or hospitality.

If the gift or hospitality is not approved it must be politely rejected. Whether approved or declined, the gift or hospitality must be registered using the form found on the Hive [here](#). It is your responsibility to ensure that the form is correctly completed, when available, for gifts or hospitality you are offered.

High Value Gifts or Hospitality

Gifts or hospitality with a value above £100 must be referred to the Company Secretary for approval before the gift or hospitality is accepted. The referral must be made using the form on the Hive which can be found [here](#). It is your responsibility to complete the form.

The Company Secretary will only approve the gift or hospitality if there is a clear business benefit to doing so. If the gift or hospitality is not approved it must be politely rejected.

What do we mean by 'hospitality'?

Hospitality means someone else pays for you to attend an event; for example, a sporting event, a concert or a business conference; or it could mean a third party paying for a lunch or an evening meal. Sometimes these events are hosted by the third party that is paying but it still counts as hospitality even if the person paying will not be there. Hospitality can also mean someone else paying your hotel or travel costs to attend an event, even if they don't pay for the event itself.

What if I have to make an 'on the spot' decision and don't have time to ask my line manager or the Company Secretary first?

Use your best judgement and ask yourself if you would feel comfortable if it was reported in the local papers that you had accepted the gift or hospitality being offered. If in doubt it is best to politely refuse it. Any gifts or hospitality that are accepted must still be reported on the form on the Hive in accordance with the guidance set out above.

What if I don't know the value of the gift or hospitality being offered?

We don't expect you to know the exact value of what is being offered, but make your best estimate using the information that you have.

What if a third party offers to make a charitable donation on my behalf?

This will depend on the timing and the value, as with other gifts and hospitality.

What if I receive a gift from a third party to celebrate a life event?

Suppliers or other third parties may send a gift to mark a life event such as a wedding or significant birthday, or to send condolences when something tragic occurs. In such a situation it is fine for you to keep the gift, as long as it could not be deemed to improperly influence you. This should still be reported to your line manager and recorded on the form on the Hive.

What if I win a prize in a raffle run by a third party?

This is fine to accept as this does not put you in a position where you could be improperly influenced, as long as the raffle is run fairly, and the winner is selected completely at random.

Attending Hospitality Events

When attending an approved hospitality event, the time taken to attend the event should only be recorded as working time if there is a business benefit in you attending. If the event does not have a business benefit then any time taken to attend should be taken as annual leave or unpaid leave if the event occurs during work time. Also, the cost of travel to the event will only be covered by Yorkshire Water, in accordance with the Travel and Expenses Policy, if there is a business benefit in you attending.

What do we mean by “business benefit”?

Business benefit means that it is helpful to Yorkshire Water for you to attend; for example, it will help you to do your job more effectively or to build a better business relationship with a key partner, supplier or service provider.

Giving Gifts or Hospitality

Gifts or hospitality provided by Yorkshire Water to third parties should be of low or medium value only and must never be given for the purpose of improperly obtaining any contract or other commercial benefit, or in a way that may be perceived as seeking to do this. Care should also be taken to ensure that any gifts or hospitality offered do not give the impression of favouritism or preferential treatment to a third party.

Gifts should not be made to Yorkshire Water colleagues at the expense of the company without prior approval from a senior manager. More information on this can be found in the Travel and Expenses Policy, which is available on the Hive.

4. Breaches of this Policy

If you are offered a bribe or become aware that someone else has offered or accepted a bribe then you have a responsibility to report this. You should report this to your line manager or a senior manager in the first instance. If for any reason this is not possible, you may report the bribe through the whistleblowing process as set out in the Speak Up Policy, which can be found [here](#).

Anyone found to have breached the Bribery, Gifts and Hospitality Policy will face disciplinary action, which may ultimately lead to dismissal.

5. Contacts

If you have any questions about this Policy please contact the Company Secretary at compsec@yorkshirewater.co.uk.

6. Assurance

Regular monitoring of procedure compliance shall be undertaken by the assurance providers documented as part of the Assurance Framework.

Definitions of Terms Used:

Yorkshire Water

Yorkshire Water is used in this document to refer to Yorkshire Water Services Limited and all other subsidiary companies within the Kelda Holdings Limited group.