

The Yorkshire Water Code of Ethics

November 2022



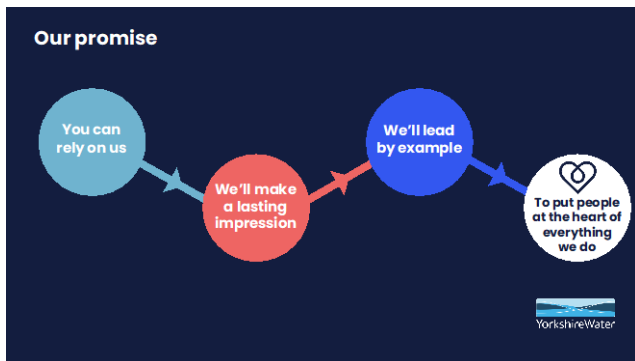
YorkshireWater

Welcome to the Yorkshire Water Code of Ethics

Yorkshire Water wants to conduct business with honesty and integrity. We want to do the right thing. This is a key part of our Big Ambition, to put people at the heart of everything we do; we want to make sure we are doing the right thing by our colleagues, our customers and the communities that we serve.

We all know the four Yorkshire Water behaviours. Being ethical and seeking to always do the right thing is an important part of each of our behaviours.

Making the right choice also forms part of our Customer Promise:



During the development of our Promise our customers told us that they want to know we are an ethically run company, so it is essential that we make the right ethical choices.

This Code of Ethics is designed to help you make the right ethical choices and to demonstrate honesty and integrity in your decisions and your conduct.

It also has links which show you where to go for help if you are not sure what to do, as well as links to the different policies that you must be aware of and follow. All of the policies referenced deal with behaving with honesty and integrity; the key principles to doing the right thing.

The link to our behaviours:



How this links to doing the right thing:

You are responsible for the choices you make and for responding in the right way, as well as for speaking up when you see others appear to make the wrong ethical choice.



How this links to doing the right thing:

You are open to working in new ways for the benefit of our customers or colleagues, always trying to find better ways of doing the right thing.



How this links to doing the right thing:

You help others to make the right ethical choice and feel supported and encouraged to challenge others when they do not appear to be doing the right thing.



How this links to doing the right thing:

You treat our customers and colleagues as you would want to be treated, valuing difference and diversity and giving a helping hand to others when they need it.

Who does this apply to?

This Code applies to everyone who works for Yorkshire Water, both directly as an employee and indirectly as a partner, no matter what job you are doing or where you sit in the organisation.

What does this mean for me?

You need to read and understand this Code and refer to it when you face an ethical choice. It shows where to go to for help if you are faced with a difficult decision, so don't hesitate to ask for help if you need it.

Ultimately you are responsible for the choices you make and for responding in the right way when you face ethical choices.

You are also responsible for speaking up if you see behaviour that may compromise the principles of this Code. More on this can be found on page 16.

What does this mean for managers?

If you are a manager you have a responsibility to ensure this Code is understood and followed by those you manage. You should take action when it appears that the Code is not being followed and seek to create an environment where the Code is promoted.

You should make sure your team knows they will be supported for doing the right thing, are listened to when concerns are raised and protected from retaliation.

You should also make sure you lead by example and be a role model for the Code every day.

Contents:	Page
Making an Ethical Choice	4
People	6
Protecting the Environment	9
Protecting Our Information and Reputation	10
Conflicts of Interest	11
Bribery	13
Financial Conduct	14
Speaking Up	16

All of the policies referred to in this Code can be found either on the Hive or the People Portal. There are links in the document but most can be found by looking [here](#) or [here](#). If you are unable to find what you are looking for please contact the Company Secretary at compsec@yorkshirewater.co.uk.

Making an Ethical Choice

What is an “ethical choice”?

Sometimes in our work we face a choice over whether or not to ‘do the right thing’. Sometimes it might be obvious what the right thing is; for example if a supplier offers us a bribe in return for placing an order with their business.

At other times it might be less obvious, as the alternative to ‘doing the right thing’ might be easier, quicker or cheaper.

For example, if we are recruiting for a role at Yorkshire Water and we know our friend could do the job well, which would save the time and money of a recruitment process.

Doing the right thing can sometimes be difficult and challenging but it is always more important than saving money, time or effort.

This Code is designed to help you make the right decision when faced with those ethical choices.

What should I do when I face an ethical choice?



Ask yourself if you are comfortable with the choice you are making and think about how you would explain the choice to your colleagues or a customer.

Make sure your actions reflect your pride in yourself, those you work with and in Yorkshire Water.

Making the right choice can sometimes be challenging but Yorkshire Water will always support you in doing the right thing.

Making a choice not to do the right thing could potentially damage the reputation of Yorkshire Water and in some circumstances could lead to fines and penalties and maybe even a criminal prosecution.

We will investigate if we believe that someone has deliberately not followed the Code or the policies linked to it. This could lead to disciplinary action or the termination of a relationship with a business partner or supplier.

What should I do if I think someone else may have made the wrong ethical choice?

If you see someone else doing something that doesn't feel right, then you should speak up. Our customers, colleagues and shareholders rely on people speaking up if something is wrong and our reputation depends on it.

There are different ways that you can do this, you can find more detail on this on page 16.

People

We put people at the heart of everything we do, which includes when we make ethical choices.

We operate safely

Health, safety and wellbeing is integral to everything we do at Yorkshire Water. We should never compromise health or safety to achieve business targets.

We all have a personal responsibility to comply with the Health and Safety Policy, standards and procedures, including the Yorkshire Water Life Saving Rules. You must take action to tackle any unsafe behaviour that you see and must intervene and stop work if you think something is unsafe.

As part of working safely, you must participate in relevant training on health, safety and wellbeing.

Our Health and Safety Policy can be found [here](#) and you must understand this and embed compliance with all health and safety policies, procedures and standards in your behaviour every day.



Where can I find out more?

All the health and safety procedures, risk assessments and safe systems of work that you need are available on the IMS and Safeguard.

Further information is available from your line manager, on the Hive or directly from the Health and Safety Team, who can be contacted at yw.health.and.safety@yorkshirewater.co.uk.

We deliver our Customer Promise

It is important to ensure we deliver our Customer Promise to our customers 365 days a year. Serving the customer is the one unifying goal that brings us all together.

You have a personal responsibility to comply with customer experience processes, policies and standards including our Customer Charter.

In order to ensure we can deliver our Promise, you must participate in relevant training on customer experience and understand all the types of customers we serve, including households, customers in vulnerability, developers, retailers, businesses and the environment.

Where can I find out more?

Our Customer Charter can be found [here](#) and you must be aware of the commitments we make to customers and ensure we protect our ability to deliver these every day.

We uphold human rights

We seek to do business in a manner that respects and promotes human rights and equality for everyone who works for us, with us, or lives in our local communities.

We support the United Nations Global Compact and have set out in our Human Rights Policy the principles that should apply in all our decision making.

The United Nations Global Compact sets out 17 Sustainable Development Goals which we support. These include the eradication of poverty, ending hunger, supporting quality education for all, achieving gender equality, and ensuring the availability of clean water and sanitation.



Further information will be available in our Human Rights Policy which is being updated and will soon be available [here](#).

Where can I find out more?

You can get information on the International Bill of Human Rights [here](#) and on the United Nations Global Compact [here](#).

Any queries relating to human rights should be raised with HR. You can contact the Policy and Advice team at hr.policyandadvice@yorkshirewater.co.uk.

We value difference in our people and our communities

Diversity and inclusion are extremely important to Yorkshire Water. We value the differences in our people and want to enable everyone to flourish, make a difference and realise their full potential.

There is a real benefit to our business of having a range of perspectives amongst our colleagues and it is important that our workforce represents the diversity of our customers.

It is essential that all colleagues are treated with fairness, dignity and respect. Each of us is a valued member of the Yorkshire Water team.

We aim to provide equal opportunities to all of our colleagues and do not tolerate any form of harassment or discrimination on the basis of race, religion, colour, sex, sexual orientation, gender identification, national origin, age, marital status, disability, pregnancy or any other basis prohibited by law.

We also do not tolerate the abuse of authority and any behaviour that is humiliating, threatening, demeaning or otherwise offensive to any of our colleagues or members of our community.

Where can I find out more?

Yorkshire Water has a Dignity at Work Policy and a Diversity and Inclusion Policy which can both be found [here](#).

If you have any further questions then you should talk to your line manager or to the Policy and Advice team at hr.policyandadvice@yorkshirewater.co.uk.

We seek to safeguard our customers and members of the public

Some of our customers are in situations where their health and wellbeing is at risk because of something happening in their lives which may be unrelated to water and sewerage services.

This could include customers with severe mental ill health, at risk of self-harm or suicide, self-neglect, children left at home alone, domestic abuse etc.

Where we can, we want to help those customers when we identify that they may be in these situations. We recognise that Yorkshire Water is not the right organisation to help with these things in the longer-term, but we want to ask the right organisations to provide support where possible.

If you identify that a customer or someone in our community is at immediate risk of harm we would encourage you to contact the police by dialling 999. This includes when a crime is occurring.

Where the risk to individuals is serious but not immediate, you may contact the police by dialling 101 or your local social care services.

Yorkshire Water will support anyone who has reported such matters to the police or social care services in good faith. If you have reported such a matter to the police or social care services, please let Occupational Health know at occ_health@yorkshirewater.co.uk or if you need occupational health support, please ask your line manager to make a referral by raising a SAM ticket in the usual way.

If you identify that a customer could benefit from being on our Priority Services Register then you should offer this.

Where can I find out more?

More information on our Priority Services Register can be found [here](#).

If you suspect that a customer or community member is at risk and you are unsure where to report this or what to do, please speak to someone in our Customer Experience team.

We report any modern slavery that we suspect in our business, supply chain or in our local community

Modern slavery is a serious crime that happens all over the world, including the UK. It can happen in many forms, from the trafficking of people to forced labour.

At Yorkshire Water we want to help eradicate this issue and will not tolerate modern slavery or human trafficking in our business or in our supply chain.

If you see or hear anything in your work that you think may indicate modern slavery then you must report this.

There is a national Modern Slavery Helpline that you can call on 08000 121 700 or find out more [here](#).

If you are concerned about a colleague or supplier you should also report the matter to the Company Secretary at compsec@yorkshirewater.co.uk or to someone in HR so that we can provide the support needed internally.

Where can I find out more?

Every year we make an annual statement on what we are doing to mitigate the risk of modern slavery. You can read our latest statement [here](#).

We also have guidance on modern slavery, human trafficking and forced marriage which can be found [here](#).

For more information on what to look out for in relation to modern slavery you can find information [here](#).

Protecting the Environment

Our company purpose is to play water's role in making Yorkshire a brilliant place to be, now and always. This includes protecting the environment in Yorkshire. A lot of what we do as a company has an environmental impact; both positive through our land management, river restoration and biodiversity, and negative through abstraction, our carbon emissions, pollution incidents and discharges from combined sewer overflows.

We are dependent on the environment for our water resources and other forms of natural capital and we want to protect it for future generations, so we must always seek to make the right ethical choices when our decisions have a potential impact on the environment.

This means that you must:

- Read and understand our Quality and Environment Policy, which can be found [here](#).
- Consider the potential impact on the environment in all your decisions, both at a personal level – for example avoiding non-essential travel, and at a company level – such as in procurement or capital programme decisions.
- Make sure you follow company advice on water use, for example by complying with hose-pipe bans.
- Report anything that you see that you think may have a negative impact on the environment. This could be anything from unnecessary waste to a pollution event or a potential leak. It might be quicker and easier to turn a blind eye or walk away when you see something having a negative impact, but ethically the right thing to do is to report it.

This might be through the [Ideas Hub](#) on the Hive, reporting a leak through our [website](#) or speaking up to your line manager or through the Speaking Up Policy. Further information on this can be found on page 16.

Where can I find out more?

More information on what Yorkshire Water is doing for the environment can be found on the Hive [here](#) and on our website [here](#).

Any questions on our carbon emissions and how you can reduce your own carbon footprint should be directed to our Sustainability team at sustainability@yorkshirewater.co.uk.

Carbon literacy

We have a course on carbon literacy that we recommend to all colleagues. If you are interested in finding out more then search for 'carbon literacy' on Success Factors to book on to the course.

Protecting Our Information and Reputation

We must do what we can to protect our company information and the reputation of Yorkshire Water.

We take great care with personal data

As an organisation we are entrusted with information that we must keep confidential. This includes information that can relate to our customers, our colleagues and our business partners.

We should all take great care when using confidential information, whether this is in an office, out on site or when working from home, and we must only ever share it with those who have a legitimate need to see it. This is a legal requirement and criminal sanctions could be brought against those who breach it.

More information on the handling of personal data and the steps we must take to keep it secure can be found in our Data Protection and Privacy Policy [here](#) and in our Information Security Policy [here](#).

Where can I find out more?

Any queries on the protection of personal data should be directed to our Data Protection Officer at dataprotectionofficer@yorkshirewater.co.uk.

If you have queries relating to information security then you can raise these through the SAM system.

We use social media responsibly to protect the reputation of Yorkshire Water

Social media is a part of everyday life for many colleagues but can easily affect the reputation of a company if it is used in the wrong way.

It is important that when you use social media, you always try to protect the reputation of Yorkshire Water, particularly if you have

identified yourself as a Yorkshire Water colleague or associate.

This means that you must not:

- Criticise or argue with customers or colleagues;
- Make negative comments about individuals or other organisations or groups;
- Post inappropriate images or links to inappropriate content;
- Portray Yorkshire Water in an unfavourable light;
- Make personal comments that may be assumed by others to be the views of Yorkshire Water.

You must also take care not to share anything about Yorkshire Water that is confidential.

There is more information in our Social Media Policy [here](#). It is important that you read, understand and comply with this Policy if you use social media.

You must also not make any public statements to the media or other third parties that could be assumed to represent Yorkshire Water, unless this is fully authorised and approved by the Corporate Affairs team.

Where can I find out more?

Any queries about the use of social media can be directed to the Corporate Affairs team at corporate.affairs@yorkshirewater.co.uk.

Conflicts of Interest

Conflicts of interest arise when personal interests compete with the interests of Yorkshire Water and our ability to make objective decisions.

Sometimes a conflict of interest cannot be avoided, for example if a family member starts working for a supplier to Yorkshire Water, but it is important to be open and transparent about any conflicts or situations that might lead to conflicts and to declare these to your line manager.

We avoid conflicts of interest where possible and declare those we cannot avoid

No-one should place themselves in a position where their personal interests are – or may appear to be – in conflict with the interests of Yorkshire Water.

Where a conflict of interest is unavoidable it must be declared to your line manager so that appropriate mitigating action can be taken if necessary.

Line managers are responsible for ensuring that declared conflicts of interest are managed appropriately and that colleagues are not involved in decision-making where they may be conflicted.

Failure to declare a conflict of interest may be a disciplinary offence. You must therefore make sure you read, understand and comply with our Conflicts of Interest Policy, which you can find [here](#).

Where can I find out more?

Any queries in relation to conflicts of interest should be raised with the Company Secretary at compsec@yorkshirewater.co.uk. This can also include if a line manager requires guidance over how a conflict of interest should be managed.

We never abuse our position or misuse company information or assets for our own benefit or others

You must never use your position, company information or company assets in a way that improperly benefits you or others. Examples of this might be:

- influencing the choice of a supplier to one where a family member works;
- passing on sensitive information about a tender process to a friend that works for one of the bidding companies;
- using a Yorkshire Water van to transport goods for a business run by a family member; or
- buying shares in a company that you know is about to be awarded a significant contract with Yorkshire Water.

Taking advantage of your position or misusing company information or assets may lead to disciplinary action, which may in turn lead to dismissal.

Where can I find out more?

The Conflicts of Interest Policy provides more detail on this. This can be found [here](#).

Any queries on this should be directed to the Company Secretary at compsec@yorkshirewater.co.uk.

Conflict of Interest Examples

Please see the Conflicts of Interest Policy for more information.

Example 1

I run a small business on eBay to earn some extra money outside of work. It doesn't interfere at all with my Yorkshire Water work and my line manager has given me written approval. Is this ok?

Yes, as long as you have written approval from your line manager then this is fine.



Example 2

I am recruiting for a position in my team which my friend would be perfect for. Am I ok to go ahead and recruit my friend, as I know they would do a good job?

This is not ok. Even if your friend would do a great job, you should not be making that decision as you are conflicted. You must report this to your line manager so that others can be included in the recruitment process to manage this risk.



Example 4

I organise the Christmas meal out for my team and we usually go to a local restaurant which my cousin owns, because we can get a discount. Is that ok?

You must declare this to your line manager and they should ensure that someone else makes the final decision over where to go.



Example 5

My boyfriend works for the electricity supplier to Yorkshire Water. I work in support services and am not involved at all in deciding who we buy electricity from. Do I need to declare this?

No, there is no conflict of interest here and therefore you do not need to declare this.



Bribery

Yorkshire Water does not tolerate bribery and corruption. We will never, under any circumstances, offer or accept bribes or influence decisions through improper means.

Yorkshire Water buys all goods and services in an open and transparent manner and we will cooperate with the authorities on any investigation into acts of bribery, even if the bribe was alleged to have been in the interests of Yorkshire Water.

Having a zero-tolerance approach to bribery and corruption may mean that we have to stop doing something or refuse to start doing something if it compromises our principles. This includes turning down gifts from third parties that are inappropriate.

We do not offer or accept bribes

You must never offer or accept bribes or kickbacks in any form. Paying, offering, requesting or accepting a bribe is a criminal offence under the Bribery Act 2010 and can result in fines and imprisonment.

You must not accept any payment you feel may be improper and you must take particular care when offering or receiving gifts and hospitality.

Suppliers and partners must be selected and dealt with in a completely impartial manner, without favouritism or preference, following our Procurement Rules.

You must never derive personal gain from a transaction involving Yorkshire Water. This includes the purchase, sale or lease of property or services.

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.

Where can I find out more?

We have a Bribery, Gifts and Hospitality Policy which can be found [here](#). You must make sure you read, understand and comply with this Policy.

Our Procurement Policy can be found [here](#). Any queries on procurement can be directed to procurement.queries@yorkshirewater.co.uk.

Any queries on bribery can be directed to compsec@yorkshirewater.co.uk.

We take great care in relation to gifts and hospitality

The exchange of gifts and hospitality can be part of building business relationships. However you must not accept or offer gifts or hospitality that could appear to create an improper advantage for Yorkshire Water or might influence decisions being made by you or any third parties.

You can find more information in our [Bribery, Gifts and Hospitality Policy](#) which sets out what is deemed acceptable in terms of the giving and receiving of gifts and hospitality and gives a number of examples. You must read and comply with the Policy.

Where can I find out more?

If you have any queries after reading the Gifts and Hospitality Policy you should contact the Company Secretary on compsec@yorkshirewater.co.uk.

Financial Conduct

In all our financial dealings we seek to conduct ourselves with integrity, transparency and honesty.

We do not tolerate fraud of any kind

At Yorkshire Water we do not tolerate fraud of any kind in our business.

Fraud does not always have to be of significant value; fraud could be claiming more than you should through your personal expenses, deliberately misusing your company credit card or claiming more overtime than you have worked. You must always ensure you do not consciously commit fraud as this can be a criminal offence.

If you become aware of fraud or suspect that there may be fraud going on, you should speak up and report it. More information on how to do this is on page 16.

Where can I find out more?

We have an Anti-Fraud Policy which contains more information. You can find this [here](#).

Information on what is allowed to be claimed through personal expenses is included in the Travel and Expenses Policy which can be found [here](#).

Information on the use of company credit cards can found in the Purchase Card Policy [here](#).

We report anyone who tries to use Yorkshire Water to help them evade tax

It is a criminal offence for Yorkshire Water to fail to prevent the facilitation of tax evasion. Tax evasion involves deliberate and dishonest conduct to avoid paying tax, it is not the same as tax avoidance or tax planning which seek to minimise the amount of tax paid but do not break the law.

Some examples that suggest there may be tax evasion by third parties might be:

- failing to register for VAT;
- requesting that payment of an invoice is made to a different country when there is no evidence of the third party operating in that country; or
- requesting that an invoice is addressed to a different entity from the one that we have provided services to or requesting that the description in the invoice is changed to something different from the services provided.

If you become aware of any of these or anything else that makes you think that a third party may be trying to illegally avoid paying tax, then you have a legal obligation to report this.

Any suspicions must be reported to the Group Tax team. Further information can be found in the Anti-Facilitation of Tax Evasion Policy [here](#).

Where can I find out more?

Any queries on this can be directed to the Group Tax team, by contacting adrian.walker@yorkshirewater.co.uk.

We actively work to prevent money laundering

Money laundering occurs when funds generated through criminal activity, such as terrorism, drug dealing or fraud, are processed through commercial transactions in order to hide where the money came from, to avoid reporting requirements or to evade tax.

Yorkshire Water will never tolerate involvement in criminal activity.

We should always evaluate the businesses we want to work with by following the right due diligence procedures and ensuring that business partners and other third parties are screened against global restricted parties' lists.

If you work with third parties as part of your role, you must be alert for possible instances of money laundering. If you become suspicious that money laundering is taking place, you must report it immediately to Internal Audit for further investigation at linda.wild@keldawater.co.uk.

Where can I find out more?

If you have queries about money laundering or need any further information then please contact Internal Audit at linda.wild@keldawater.co.uk.

We do not use confidential information to participate in insider dealing

Yorkshire Water does not have shares that can be bought on a stock exchange. However we do have bonds and loan notes available on different stock exchanges which means that we have to comply with the laws relating to market abuse.

If you have access to information about Yorkshire Water that has not been made public and may affect the decision of an investor over whether or not to buy Yorkshire Water bonds or

loan notes, then you must not use that information for your own or anyone else's benefit.

This information might, for example, be about our financial results, a significant project or a change of roles on our Board.

If you have access to such information you must also not share it with your friends, family or anyone else until it has been made public through an external announcement by Yorkshire Water.

Insider dealing is a criminal offence and can lead to large fines and potential imprisonment.

Further information is in our Insider Dealing Policy which be found [here](#).

Where can I find out more?

If you have any questions about insider dealing, or if you are unsure whether the information you have might be considered to be inside information, then you should contact the Company Secretary at compsec@yorkshirewater.co.uk.

Speaking Up

There may be times when you become aware that other colleagues or third parties associated with Yorkshire Water may not be complying with this Code of Ethics. If this is the case you have a responsibility to put people at the heart of everything you do by speaking up.

You should speak up even if the other person is a senior colleague. We all need to keep our eyes and ears open and speak up about anything we see or hear that causes us concern.

This can be done in a number of ways, which are set out below.

Using your Stop Work authority

If you feel that you are being asked to do something that is unsafe, or if you see behaviour that is unsafe or breaches a health and safety policy, then you can use your Stop Work authority.

All colleagues have a Stop Work card which you can use at any time to stop your own work, the work of other Yorkshire Water colleagues, contractors or suppliers.

No-one will ever be penalised for using their Stop Work card to stop work that they genuinely believe is unsafe.

Where can I find out more?

More information on using the Stop Work card can be found on Safeguard or by contacting the Health and Safety team at yw.health.and.safety@yorkshirewater.co.uk.

Escalating to your line manager or someone else in a senior position

If it is not possible to use your Stop Work card, or if you have seen a breach of this Code of Ethics which does not relate to safety, then in the first instance you should talk to your line

manager or to someone else in a senior position.

Your line manager, or senior colleague, should listen carefully to what you have to say and then take appropriate action.

If you do not feel as though your concerns are being listened to then you can always try an alternative senior colleague, a member of the YWLT or you can contact HR or raise a concern through the Speak Up Policy.

Contacting HR

If your concern relates to a breach of an HR policy, such as the Dignity at Work Policy or the Diversity and Inclusion Policy then you should report the matter to HR.

This can be done by contacting the Policy and Advice team on hr.policyandadvice@yorkshirewater.co.uk.

HR operates both a harassment procedure and a grievance procedure, depending on the nature of the concern raised.

Both procedures are set out in the Dignity at Work Policy which can be found [here](#).

Where can I find out more?

If you have any queries on reporting matters to HR then you can contact the Policy and Advice team at

hr.policyandadvice@yorkshirewater.co.uk for further information.

Through the Speaking Up Policy

If your concern does not relate to an HR matter and you do not feel comfortable approaching your line manager or a senior colleague, you may report matters through the Speaking Up Policy which can be found [here](#).

Anyone who raises a genuine concern through the Speaking Up Policy will be protected from any retaliation and there is a clear process in

the Policy which sets out how all matters raised will be independently investigated.

You can also raise matters anonymously through the Speaking Up Policy if you wish to do so, although you should remember that this can sometimes make it harder for matters to be properly investigated if those doing the investigating are unable to contact you to ask further questions.

Where can I find out more?

If you have any queries about the speaking up process then please contact the Head of Risk and Internal Audit at rachel.lindley@yorkshirewater.co.uk.

You can speak up by calling the independent hotline SafeCall on 0800 915 1571

or emailing one of the following:

Chief People Officer – jenni.morris@yorkshirewater.co.uk

Head of Risk and Internal Audit – rachel.lindley@yorkshirewater.co.uk

Company Secretary – kathy.smith@yorkshirewater.co.uk

Independent Non-Executive Director – andrew.d.merrick@yorkshirewater.co.uk

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