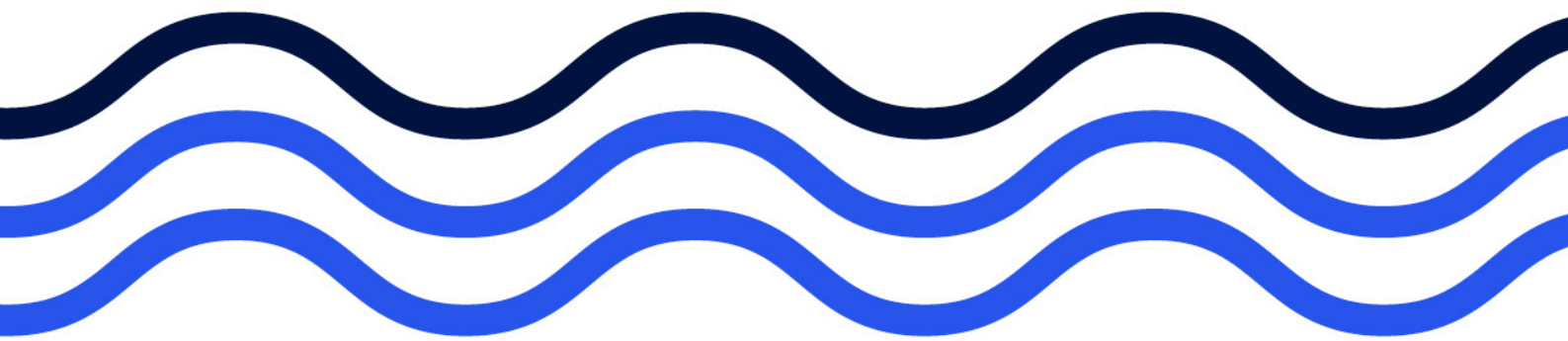


Conflicts of Interest Policy



YorkshireWater

Document Control

Document Control Ref:	CO2
Document Location:	Hive
Document Custodian:	Company Secretary
Review Period:	Annually

Document Approval

Name Company Secretary	Name YWLT
Document Owner (Author)	Document Approval Manager (Tier 1 or 2)

Document Revision History

Version	Date	Revised By	Reviewed By	Amendment Details
1	01/10/2021	Kathy Smith	YWLT	New Document
2				
3				

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

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

You must not place yourself in a position where your personal interests are, or appear to be, in conflict with the interests of Yorkshire Water.

Sometimes a conflict of interest cannot be avoided. In this situation you must declare this openly and transparently so that it can be managed in the right way.

This policy sets out when a potential conflict might be an issue and what to do about it. The policy aims to protect both you and Yorkshire Water to ensure we conduct our business in the right way and manage conflicts appropriately. This is part of our Customer Promise that we are an ethically run company.

2. Conflicts of Interest

There are many types of conflict that can arise in your work. The table over the page sets out the most common potential conflict situations, when these are acceptable and when you are required to act.

The table does not contain every possible potential conflict that could arise; therefore it is important if you ever find yourself in a situation where your judgement might be compromised that you stop and think about the right thing to do ethically. You should always try to avoid situations where you are conflicted but if that is not possible, you must speak to your line manager and make them aware of the situation so that they can advise you on the best action to take.

This Policy should be read alongside the Bribery, Gifts and Hospitality Policy, which sets out when you may have a conflict of interest through the receipt of gifts or hospitality.

Potential conflict situation	When is this okay?	When do I need to take action?
<p>You have an interest in a supplier or potential supplier to Yorkshire Water.</p> <p>For example, a friend or family member works there or you have a financial interest in the company, such as holding shares.</p>	<p>This is fine as long as you are not involved in the supplier selection process or in discussing or rating the supplier performance.</p>	<p>If you are involved in the supplier selection process, or in discussing or rating the ongoing performance of the supplier, then you must report your interest to your line manager and they must take steps to ensure you are removed from any decisions or performance discussions regarding that particular supplier.</p> <p>The conflict and the steps taken to avoid it must be reported to the Company Secretary at compsec@yorkshirewater.co.uk to ensure we have a trail of this decision.</p>
<p>You have access to confidential information through your Yorkshire Water work which may benefit you, a friend or family member if you were to share it outside the organisation.</p> <p>For example, information on a future contract award, a future asset sale or personal information on colleagues or customers.</p>	<p>-</p>	<p>It is never okay to share confidential information outside of Yorkshire Water. This is a disciplinary offence and in some cases, depending on the nature of the information shared, this could also be a criminal offence.</p>
<p>You have the opportunity to use a Yorkshire Water asset to help with something outside of work.</p> <p>For example, using your Yorkshire Water van to transport goods for a friend, or printing a brochure for a family business on a Yorkshire Water printer.</p>	<p>On a limited and occasional basis it is permitted for company-owned computers and phones to be used for personal use, so long as it does not interfere with work priorities, is not illegal and does not present any risk or liability for Yorkshire Water. This does not include the downloading of unauthorised software to your company-owned device, which is not allowed.</p> <p>In a medical emergency it is permitted to use a company vehicle for personal use, for example to transport a family member to hospital when no other vehicles are available.</p>	<p>Using Yorkshire Water assets for any other non-Yorkshire Water purpose is not allowed, unless this has been agreed in advance, in writing, by your line manager. You must keep this written permission as evidence of the approval.</p> <p>Line managers must only give permission in exceptional circumstances.</p>

Potential conflict situation	When is this okay?	When do I need to take action?
<p>You work with a relative or are in a relationship with someone you work with at Yorkshire Water.</p>	<p>This is fine as long as you are not in a position to influence the performance management, career progression or work allocation of the other person.</p>	<p>If you are in a position to influence the performance management, career progression or work allocation of your relative or someone you are in a relationship with, then you must let your line manager know as soon as possible.</p> <p>Your line manager must then take steps to ensure that the conflict is minimised. This could be through restructuring the team to remove the conflict or involving others in discussions around performance management, career progression or work allocation.</p>
<p>You earn extra money through working in another role outside of Yorkshire Water or you hold an elected position outside of Yorkshire Water.</p> <p>For example, being paid to work in the family business at the weekend, running a business on eBay in your spare time or working in a pub on an evening or weekend. An elected role might be a position as a local councillor, for example.</p>	<p>It is only okay to take on additional work outside of Yorkshire Water if this does not have any negative impact on your performance for Yorkshire Water. The extra work must also not involve the use of any Yorkshire Water assets.</p> <p>If you are in an elected position, or running for election, then you must take care not to work on issues that impact the area you represent or seek to represent. You must also make sure that Yorkshire Water does not form part of your campaigning activity.</p> <p>You must always seek approval from your line manager, in writing, for any additional paid or elected role you take on outside of your role at Yorkshire Water.</p> <p>Your line manager must be reasonable when considering whether or not to give approval. Any approval given can be withdrawn at any time if it is found that the other work is negatively impacting on your performance at Yorkshire Water.</p>	<p>You must always seek approval from your line manager for any additional role you take on outside of your role at Yorkshire Water.</p>

Potential conflict situation	When is this okay?	When do I need to take action?
A friend or relative applies for a job with Yorkshire Water.	We encourage people to refer friends or family for roles at Yorkshire Water so this is absolutely fine, as long as you are not involved in the recruitment itself.	<p>If you are involved in the recruitment and may be in a position to influence the decision then you must declare the interest to your line manager.</p> <p>Your line manager must take steps to ensure that either you are removed from the recruitment process or others are added so that you are not able to unduly influence the recruitment decision.</p>

3. Confidentiality of Declarations

In making a declaration to your line manager you may be sharing personal information. All declarations must be kept confidential by your line manager and will not be shared with anyone else other than when requesting advice on the appropriate way to manage the conflict, or when sending information to the Company Secretary, where it will be securely stored.

4. Breaches of this Policy

Anyone found to have breached the Conflicts of Interest 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.
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