

# Anti-Bribery & Corruption Policy

## July 2021

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Most countries have laws which prohibit corruption. In addition, an increasing number of countries, including the UK, have laws to prohibit bribery even when it is committed outside their borders.

United Utilities forbids any employee to offer or accept any payment, gift, entertainment, hospitality or service, political contribution, charitable donation or sponsorship for the purpose of inducing any person or organisation to carry out their duties or functions improperly. This policy applies to any dealings with private individuals, public and private sector employees, foreign public officials and public and private sector organisations. It must also be adhered to in all overseas dealings, regardless of local laws and cultures.

The Bribery Act 2010 makes it a criminal offence for an individual or a business to offer, promise or give a financial or other advantage to another person, or to request, agree to receive or accept a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly. Additionally, UU could be guilty of failing to prevent bribery if an associated person (for example any employee or contractor) paid a bribe on behalf of UU.

UU has procedures and policies in place to prevent bribery being committed on its behalf, which all employees must follow. In particular, the Hospitality Policy permits only proportionate and reasonable hospitality for legitimate business purposes. Charitable donations must be in accordance with the Company's approach on charitable giving. In addition, our United Supply Chain approach sets out the standards that we expect from the organisations we deal with and makes clear that we do not tolerate corruption or bribery.

The maximum penalties for giving or receiving bribes are 10 years imprisonment and an unlimited fine for an individual, and an unlimited fine for companies; however, even the appearance of a breach of anti-bribery or anti-corruption laws could damage UU's reputation. If any employee suspects they may have been offered a bribe, or becomes aware that any bribe may have been given, requested or received on behalf of UU they should speak to their line manager, contact the Legal Team on [legalservices@uuplc.co.uk](mailto:legalservices@uuplc.co.uk), or refer to the Whistleblowing Policy.

In addition, in accordance with the Proceeds of Crime Act 2002, employees should be vigilant in respect of money received by the business. This is to ensure that funds received are not the result of money-laundering and are not in any way connected with criminal activity. Employees should speak to their line manager if they are suspicious of any funds received, or contact the Legal Team for advice.