

Doing the right thing



Anglian
Water
Group

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Foreword

A message from Peter Simpson: Guiding our choices

Anglian Water's Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. This Purpose is underpinned by a set of core values, one of which is a commitment to 'Do the Right Thing'.

At Anglian Water we live by our values. They help us choose the right behaviours, to hold ourselves accountable to and to constructively challenge if we see or hear something we believe to be wrong.

But sometimes we need a bit more guidance to feel absolutely confident that our choices are in the best interests of the business, and indeed in our own best interests too.

This 'Doing the Right Thing' code gives an overview of what we expect from our people in different situations. It's designed to show you how some of our policies work in practice and help you do the right thing, especially when you're faced with a decision which is not central to your role.

For the most part, it's about taking personal responsibility and showing courtesy and respect for others - something we expect as standard here - but I also hope you'll find the information useful, especially if you find yourself faced with an unfamiliar or unusual choice.

Peter Simpson

Chief Executive Officer



Your obligations

'Doing the right thing' applies to everyone, whether working in the regulated business (Anglian Water Services) or in one of the group's non-regulated businesses (including employees of AWG Group Ltd, Tide Services Ltd and Alpheus Environmental Ltd) or in one of our Alliance Partner organisations.

All of us, including our Alliance Partners, are integral to the way we operate and deliver excellence for our customers. Our aspiration is to be 'one organisation' in all that we do; behaving and working to the same set of standards can only reinforce this and give consistency across all organisations. We are delighted that our Alliance Partner organisations have chosen to adopt Anglian Water's 'Doing the right thing' code of conduct (set out in this document) - this will ensure that everyone is working with the same clear guidance and standards of behaviours.

We expect everyone to 'Do the right thing' and comply with the standards set out in this code. We also expect everyone to understand and follow all applicable policies and procedures when carrying out their work.

The purpose of this code of conduct is to illustrate how our policies work in practice and to help you make the right decision. It is not intended to replace more detailed policies and procedures. Anglian Water Services employees will find all the policies referred to in this document on Lighthouse.

If you suspect that one of your colleagues is not adhering to our standards, you should alert your line manager or any other senior manager within the business.

If you don't want to raise a concern with your line manager or other senior manager, you can contact the whistleblowing hotline, which is managed by **See Hear Speak Up** (see the whistleblowing information on pages 29 and 30). Please also see our Whistleblowing Policy for further information. Whistleblowing can be done without giving your name.



A. Health and Safety

Health and Safety: an overview

Everyone has a personal responsibility to ensure that they do the right thing, follow the safe systems of work and not take chances or shortcuts.

We expect everyone to do their bit, looking after themselves and each other. We are passionate about creating and sustaining happier, healthier and safer work environments for all our employees, partners, customers and for the communities we support.

We are committed to looking after our employees' and partners' safety and believe that work should have a positive impact on their health and wellbeing. Underpinning this approach is LIFE, a philosophy that brings health, safety and wellbeing together and reflects our vision of happier, healthier and safer employees. It creates a culture of care and concern where we look out for each other, build strong relationships with good conversations and do the right thing at work and at home.

We want you to make it safe, make it home every day without harm to your health. Our priority is to ensure that your workplace and the equipment you use is safe and that your health is not put at risk.

There are health and safety procedures in place across the business to protect all and minimise risks. Active management visits are carried out where managers will discuss safe systems of work to understand the practicality and application and ensure they are suitable. Please engage fully to ensure systems are followed and fit for purpose.

Our **Health and Safety Charter** and Policy sets out our commitment to a goal of **no accidents** and **no harm to people**.

We have three simple values that we expect you to adopt:

Slow down - nothing is so important that we cannot take the time to do it safely

Be aware - we will never knowingly walk past an unsafe or unhealthy act or condition

Think - we believe that work should have a positive effect on health and wellbeing and that all accidents or harm are preventable.

To support our charter, everyone has been issued with a **STOP card** to use if they feel something is unsafe or could cause harm. We have also developed the **Safe and Well App** for a simple way to report near misses and accidents. Please download and use the app to help improve health and safety engagement across the business.

Our leaflet "Guides to Keeping Safe and Healthy" provides an overview of the risks that nearly every employee and partner will encounter, together with information on "What I need to do" to avoid the risk of harm. Not all the areas will apply to you; please discuss with your manager which ones apply. We have also developed standards to make sure that our employees, partners and contractors are consistent in their approach to high-risk activities.

A. Health and Safety



Health and Safety: doing the right thing

All new employees must complete an appropriate induction to ensure health and safety arrangements are understood.

We will :

- provide appropriate training and support
- provide the correct equipment to carry out the work safely
- provide all relevant health and safety information for work activities
- actively manage and supervise
- communicate health and safety messages consistently and encourage suggestions for improvements

Our expectation is that you will:

- be fit for work
- only start work when it is safe to do so
- take responsibility for your own safety and that of others
- be open to challenge
- use your STOP card if anything changes, if you feel pressured into taking short cuts, or if you feel you don't have the right skills, knowledge, training or experience for the job
- always set the very highest standards of safety behaviour, and be mindful that your positive behaviours and actions will help stop people getting harmed.
- before you start any task, scan your work area for hazards (especially if you are field based)
- Report all accidents, near misses and hazards
- Never be afraid to approach someone who is acting unsafely - looking the other way only condones poor behaviour and will lead to accidents
- Sort any unsafe situation you see if you can - and if you can't sort it, report it. Always take immediate corrective action; it may save you or others from being harmed in the future.



Health and Safety: doing the wrong thing

We will hold people to account where they knowingly break health and safety rules. If you don't take your health and safety responsibilities seriously, you may also find that you have failed to demonstrate the attitudes, skills and behaviours that we expect of everyone. This may have an impact on your annual performance review.

For more information:

- Safe and Well - Safety Management System
- My Guide and Your Guide to Keeping Safe and Healthy booklet
- Our Health and Safety Charter and Policy

B. Drugs and alcohol

Drugs and alcohol: an overview

Drugs

The taking of any non-prescribed, controlled drugs or substances and the misuse of prescribed or non-prescribed drugs, which may adversely affect your behaviour or your performance at work is not allowed at any time.

If you are taking prescribed medication that may have an effect on your ability to carry out your job, you must seek advice from Occupational Health and tell your manager before beginning work.

We operate a zero tolerance policy to the use or misuse of drugs and attending work.

Alcohol

Attending work whilst over the legal alcohol limit is not permitted at any time.

If you are driving a company vehicle, operating machinery or on standby and callout, the consumption of alcohol is not permitted under any circumstances. You can only consume alcohol on our premises in special circumstances and only with the express permission of your line manager.

These circumstances may include:

- organised social events, e.g. the extension of hospitality to our visitors
- events provided by managers for their employees.

Please make suitable travel arrangements if you are planning on drinking alcohol at these types of events.

Alcohol and drug testing

If you are required to drive a commercial vehicle, qualify for a company car or operate machinery or testing equipment (e.g. laboratory staff), or you manage anyone who does, you may be required to undergo alcohol and drug testing.

Testing will be carried out as a matter of course where a potentially serious incident, dangerous occurrence or major accident has taken place. This will take place as part of the standard accident and investigation process.

Where a manager has grounds for suspecting that a team member is unfit to work safely or professionally as a result of alcohol consumption or drug misuse, or that a team member has been involved in an incident due to being under the influence of alcohol or drugs, the team member may be required to take a test to determine whether they are fit to carry out their duties.

If you talk to us about a substance misuse problem before you are tested, you will be offered help and assistance towards your recovery.

B. Drugs and alcohol

Occupational Health records are covered by the same standards of confidentiality as records held by a GP or hospital specialist. For this reason, line managers are provided with pass/fail information only. The full details of test results or other personal medical information will only be disclosed with your permission, or in very exceptional circumstances (such as where there is a legal obligation to disclose the information).

✔ Drugs and alcohol: doing the right thing

When you are working, representing the business or conducting business you must be able to carry out your duties in a safe, competent and professional manner and in compliance with the law, free from the adverse effects of alcohol or drugs.

✘ Drugs and alcohol: doing the wrong thing

As health and safety is our highest priority, if you fail a test, refuse a test, or refuse to wait for the arrival of the tester, or in any other way interfere with the reasonable undertaking of a test you may, after a full investigation of all of the relevant facts, face disciplinary action. This may result in dismissal for gross misconduct.

For more information:

- [Drugs and Alcohol Policy](#)
- [Drugs and Alcohol Testing Procedure](#)



C. Dignity at work

Harassment and bullying: an overview

We want to promote a working environment which is free from intimidation and discrimination, where we all behave in a professional way towards each other. We actively encourage diversity within the workforce and will not tolerate behaviour that is unwelcome, unreasonable or offensive. All employees have an obligation to treat colleagues and customers with respect and dignity.

Harassment and bullying: doing the right thing

Try to resolve the problem as soon as possible. If you can, deal with the problem informally, first by telling the harasser the effect their actions or remarks have upon you. Often an individual may be unaware that their behaviour is causing offence and direct feedback may be enough to solve the problem.

Many problems can be stopped at the early stages if you can tell the harasser to stop.

If you feel the informal approach is not appropriate, you can speak to your manager or make a written complaint to the harasser's manager and/or your Employee Relations Manager/Adviser.

Always:

- if your complaint relates to your manager, raise any concerns you may have with your Employee Relations Manager/Adviser
- keep records of any offensive behaviour including dates, times and witnesses
- challenge unacceptable behaviour, whether directed at you or at a colleague

Harassment and bullying: doing the wrong thing

Never:

- deliberately exclude others
- make offensive remarks or jokes about others
- display or circulate obscene or offensive material, by posting pictures, telling jokes or sending emails
- threaten anyone physically or verbally or touch anyone in what could be considered an inappropriate way
- refer to anyone's race, sex, sexual orientation, age, religion or disability inappropriately

C. Dignity at work

Sometimes, behaviour that is construed as bullying or harassment is actually poor management. It is sometimes difficult to distinguish between good, close management and over management. In these instances, training and guidance will be provided for the manager concerned and their performance will be monitored.

Good management	Bullying
Setting realistic targets	Deliberately setting unachievable targets
Giving feedback in private	Giving negative feedback in public
Legitimate, constructive and fair criticism of performance or behaviour	Unfair or unjustified criticism
Regular supervision	Intrusiveness, over-managing
Keeping records	Keeping unnecessary and unjustified records on irrelevant information
Challenging poor performance in order to improve performance	Unsubstantiated criticism with no improvement plan

Harassment and bullying are not only breaches of our rules but could mean breaking the law as well. Anyone who harasses, bullies or victimises anyone else in any form may ultimately be subject to a disciplinary procedure if the actions are found to be substantiated or are repeated after an informal approach.

Any allegation that is found to be malicious will be treated as a disciplinary offence.

For more information:

- Dignity at Work Policy and Procedure
- Grievance Policy and Procedure
- Whistleblowing Policy and Procedure

D. Relationships at work

Personal relationships at work: an overview

We don't want to take a moral stance on relationships at work or intrude into the private lives of our employees. However, we recognise the potential for real or perceived conflicts of interest when employees develop close personal relationships with each other, or with the employees of a supplier or partner organisation.

For example, problems can arise where someone is in a position to:

- give work to a particular supplier
- appoint to a job
- authorise expenses or other payments to someone with whom they have a close personal relationship or friendship outside work

Where a close, personal or family relationship exists or develops between two people working for us, or with someone who is a supplier, you must follow the steps in the Personal Relationships at Work Policy.



Personal relationships at work: doing the right thing

Where you have a relationship or close friendship with the potential to create a conflict of interest you should immediately take the following steps:

- let your manager have brief details of the relationship and the potential conflict
- remove yourself from the area of conflict, e.g. by changing delegated authorities or removing yourself from all decisions related to pay, expense claims or appraisal
- where the other person involved in the relationship works for a supplier, you should not be involved in any decision regarding contracts with or payments to that supplier or their competitors.

These arrangements also apply to family relationships where members of the same family are working for us (e.g. where we employ one of your parents, or one of your children or a sibling), or where a member of your family works for a supplier.



Personal relationships at work: doing the wrong thing

You may face disciplinary action in circumstances where you fail to disclose the potential conflict of interest and take inappropriate actions.

For more information:

- Whistleblowing Policy
- Dignity at Work Policy
- Personal Relationships at Work Policy

E. Information security

Cyber security: an overview

Everyone has an obligation to ensure that the information we have access to every day does not fall into the wrong hands or get used for anything other than its intended purpose. This applies whether we are working in the office, off-site in the field or working remotely, such as working from home. We can all play our part by following some simple guidelines and ensuring that we deal with information in the appropriate way - this includes disposing of records and information we no longer need at the appropriate time using a secure method.

We must take particular care when dealing with confidential information. We refer to confidential information as “Sensitive Information” (not to be confused with sensitive personal information or special category data). Sensitive Information is anything that may be detrimental to the business or to that of our partners, might negatively impact our reputation or could breach our legal obligations if disclosed.

Both physical and electronic documents can contain information which may be considered sensitive and might include information which:

- arises from informal discussions
- was discussed in meetings or in private
- is saved or stored on a computer or external device such as a phone or tablet
- is hosted by a third party on a cloud-based system
- is transmitted by way of email or other communication.



E. Information security

Cyber security: doing the right thing

We all have a role to play in protecting our information assets from loss, compromise or damage. To protect our information:

- ensure that you comply with our “Acceptable Use of IT” policy
- always secure your computer when not using it, such as locking the screen or shutting the device down, and ensure your mobile devices are password protected
- follow all remote working guidance
- if you need to send personal data, or where the information includes bank details or special category data, it should always be sent in an attachment and password protected or encrypted or an approved file sharing system such as Microsoft OneDrive
- don’t forward work emails containing Sensitive Information to your personal account
- don’t download work documents and save them on your personal computer - using One Drive allows you to access and amend Anglian Water documents via Office 365 so there is no need to save them elsewhere
- don’t share your logins or passwords
- never plug non-AWG Group devices into work equipment without approval from IS
- don’t open emails or attachments from a source which may be untrustworthy (this includes emails which purport to be from someone within AWG Group but are not from the correct email address)
- ensure that any suspicious emails are sent to the SPAMBIN promptly, using the published process
- report any IT security incidents to the service desk immediately.

Cyber security: doing the wrong thing

Taking insufficient care when dealing with Sensitive Information or with unsolicited emails could result in a considerable cost for us (both financially and reputationally). In addition, a failure by you to comply with our policies could result in disciplinary action. Any use of IT that contravenes the Computer Misuse Act is not accepted.

Non-acceptable activities include (by way of example):

- copying music and movies with computer equipment and distributing it on the internet without the copyright holder’s permission
- email and chat room abuses
- hacking (i.e. using a network, the internet or any other connection to gain access past security passwords or other security to see data stored on another computer)
- accessing indecent material and pornography (in particular material which shows illegal acts).

E. Information security

Physical security: doing the wrong thing

You must take care not to leave anything containing confidential information unsecured.

In particular:

- consider whether you actually need to print out a document - avoid the problem of keeping confidential information physically secure
- don't leave confidential information on your desk or in your workspace when you are no longer working at it
- clear your desk of boxes, files and papers at the end of the day
- take care not to leave sensitive, confidential or personal data on printers, faxes or photocopiers
- when working remotely ensure that others can't see your screen and be careful about being overheard
- don't use any recording devices unless approved by your line manager
- don't keep information for longer than is necessary
- allocated storage should be used to store all files and paperwork. Where this storage consists of lockable cabinets, you must ensure that these cabinets are locked when not in use.

We have a formal Information Retention Policy in place which explains how long we must keep certain types of information once it is no longer needed/current. Any personal information you hold must comply with the Retention Policy.

All employees must undertake the Cyber Security training as directed.

For more information:

- HR Acceptable use of IT policy
- AWS OneDrive Security Policy
- AWG Bring Your Own Device Policy
- Section H in this booklet for more on Protecting Personal Data
- WorkDay Training modules on Cyber Security
- Computer Misuse Act: <https://www.cps.gov.uk/legal-guidance/computer-misuse-act>

F. Email and internet use

Email and internet: an overview

You are responsible for your use of company IT equipment and should follow the terms of the HR Acceptable Use of IT Policy. Your use of these facilities should not interfere with or take priority over your work or lead to anything which may cause the company harm in any way.

Internet and email usage are monitored, and inappropriate sites are restricted. In the event that you accidentally access an inappropriate site you should close it down immediately.



Email and internet access: the right choice

Limited personal use of the internet, including access to social networking sites, is acceptable on work devices, either at work or out of the office, but you should ensure that you do not do anything that is likely to bring the company into disrepute. Personal use should only take place during lunch breaks or outside working hours.

Delegation of email and calendar permissions should be carefully considered to ensure that personal information is handled appropriately.



Email and internet access: making the wrong choice

You should not send chain mail, marketing, or inappropriate material which could cause offence, bring our reputation into disrepute or have a detrimental effect on you.

In the event that you receive an inappropriate email or image you should delete this immediately from your mailbox. If you know the sender you should take steps to stop such emails.

The consequences of failing to make the right choices in relation to email or internet use could include:

- disciplinary action
- possible police/legal involvement if you are found to be in breach of the law
- fines and other regulatory enforcement action.

For more information:

- HR Acceptable Use of IT Policy

G. Social media

Social media: an overview

Our customers expect us to communicate with them through various forms of social media. We currently have an active presence on Facebook, Twitter, YouTube, Instagram, LinkedIn and Snapchat, and nominated teams within the business are tasked with speaking on behalf of the company. You should remember that conversations taking place online are just as important as those by letter or email - often more so given the instant nature of response and the speed at which information can spread through these channels.

Posting on social media: doing the right thing

Before you post anything on social media, ask yourself whether you would be happy for anyone, including your customers, manager or colleagues, to see it. A good test is to ask yourself whether you would be prepared to say the same thing to a journalist - if not, you shouldn't be posting it online!

- Use common sense, be careful of your language and tone, and make sure you stay within the law generally (not just if/when speaking about Anglian Water or your organisation)
- If someone who knows that you work for Anglian Water contacts you via social media with a customer service complaint, direct them to our official channels
- Avoid heated exchanges online and let the Digital Customer Services team and/or Brand and Communications take care of the issue, however tempting it may be to step in
- Remember, screenshots can make anything public online, whether it was originally posted privately or not.

Please take care not to post any images of our sites, assets or people that have not been appropriately checked and reviewed, e.g. a health and safety check of an image of a site or a consent check for an image of a colleague. If you spot something damaging to the company, please let the Media Team know as soon as possible by email. And if you've got a great story about Anglian Water's work, or you've taken a great picture, then send it to the Brand and Marketing team - it could be part of our next publicity campaign!

Posting on social media: doing the wrong thing

Our Acceptable Use of IT policy covers the use of social media. All employees are expected to adhere to their terms and conditions of employment, including maintaining confidentiality and representing the company ethically and with integrity. Any breach of contract could result in disciplinary action. There is also the risk of police/legal involvement if you are found to have posted anything discriminatory or illegal.

For more information:

- Acceptable Use of IT Policy
- A Guide to Our Use of Social Media
- Social Networking Policy

H. Protecting personal data

Data protection: an overview

Most of us have access to and use personal data - whether it's information about customers, suppliers or colleagues. Whenever we use personal data we have compliance obligations under the General Data Protection Regulations (GDPR) and Data Protection Act 2018 (DPA), and this includes ensuring that we comply with the data protection rights that individuals have.

'Personal data' means any information that relates to an individual. That individual must be identified or identifiable either directly or indirectly from one or more identifiers within the information (e.g. name, customer number, telephone number, location data, online identifiers, postcode etc) or from factors specific to the individual.

Some of the personal data that we use is more sensitive in nature and therefore requires a higher level of protection under the legislation. This type of personal data is known as 'special category data' and includes personal data about an individual's race/ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (where this is used for identification purposes), health data and sex life or sexual orientation.

Personal data can include information relating to criminal convictions and offences (e.g. information about speeding offences). This also requires a higher level of protection. All employees, partners, agents and contractors must use personal data in accordance with the GDPR, DPA, any code of practice or guidance issued by the Information Commissioner and any advice given by the Data Protection Officer or Data Protection and Privacy Team. Unauthorised use of personal data can amount to a criminal offence.



H. Protecting personal data

The GDPR and DPA outline six principles and fundamental obligations that everyone must comply with when using personal data.

These principles are:

- **Lawful, fair and transparent** - you must use personal data lawfully, fairly and in a transparent manner in relation to the individual.
- **Purpose limitation** - you must only collect personal data for a specific, explicit and legitimate purpose. You must clearly state what this purpose is, and only collect data for as long as necessary to complete that purpose.
- **Data minimisation** - you must ensure that personal data you process is adequate, relevant and limited to what is necessary in relation to your processing purpose.
- **Accuracy** - you must take every reasonable step to update or remove data that is inaccurate or out of date. Individuals have the right to request that we erase or rectify inaccurate data that relates to them, and, if applicable, we must do so without delay.
- **Retention (storage limitation)** - you must delete personal data when you no longer need it. The timescales in most cases aren't set. They will depend on the business' circumstances and the reasons why you collected the data at the outset.
- **Security (integrity and confidentiality)** - you must process personal data securely and protect it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

In addition there is an **Accountability** obligation - all organisations that use personal data must be able to demonstrate that they comply with the GDPR principles.



Dealing with personal data: doing the right thing

There are some simple steps that you can take to ensure that you comply with the GDPR principles:

- keep all personal data safe and secure, e.g. by following the data protection policy, protection of confidential information (physical environment) policy, guidance issues on remote working and the acceptable use of IT policy
- only keep information for as long as is necessary (as defined by the Retention Policy and local retention schedules)
- only use personal data for the purpose for which it was originally intended
- complete a Privacy Impact Assessment (PIA) to ensure that a project or processing activity complies with data protection and privacy requirements
- report personal data breaches to the Privacy Team as soon as you become aware of an incident
- ensure that your use of personal data is recorded as a processing activity in your organisation's Article 30 register (the statutory record of processing activities)
- ensure that personal details are recorded accurately, especially for new customers
- direct customers to our Customer Privacy Notice, which informs customers about what we do with their data. We also have a separate Employee Privacy Notice which explains how we use employees' personal data
- seek advice from the Data Protection Officer (Claire Russell) and the Privacy Team (GDPR@anglianwater.co.uk) if you are unsure what you should do.

H. Protecting personal data

Training

All Anglian Water employees (and other employees as directed) must complete the GDPR e-learning course on Workday.

Dealing with personal data: doing the wrong thing

Don't:

- keep personal data 'just in case it might come in useful...'
- give out information to an unauthorised person (someone other than the individual to whom the information relates or their nominated representative). In particular, you should not assume that a family member of a customer is entitled to obtain information about the customer - unless they can demonstrate that they have been authorised to do so
- discuss any details of an account with an individual until you have completed all ID & V checks (processes to verify the identity of the person you are dealing with)
- access personal information if you do not have the authority to do so
- use work systems for unauthorised personal reasons
- email or transfer personal information without appropriate safeguards, including passwords, encryption, VPNs etc.

What is a personal data breach?

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. A breach is more than just about losing personal data.

If you become aware of or suspect a personal data breach, report it immediately to the Privacy Team or your Compliance lead. Anglian Water breaches should be reported to the Data Protection & Privacy Manager (dHorrex@anglianwater.co.uk) and the Privacy Officer (hSandham@anglianwater.co.uk).

Significant personal data breaches must be reported to the regulator within 72 hours, so the quicker you act the better. The consequences for failing to do the right thing when using personal data could include:

- disciplinary action
- possible dismissal (if the incident is serious enough to warrant it)
- criminal prosecution by the regulator
- the loss of trust and confidence in Anglian Water
- large fines and enforcement action by the regulator

For more information

- Data Protection Policy
- Privacy Impact Assessment (PIA) Policy
- Personal Data Breach Response Plan
- Retention and Disposal Schedule
- Customer Privacy Notice
- Employee Privacy Notice

I. Fraud

Fraud: an overview

Fraud involves:

- deceit, the intention to deceive or secrecy
- an actual loss or gain
- the intent to cause loss to another or expose them to the risk of it
- dishonesty

Offences of fraud can include theft or embezzlement (secretly taking money that is in your care, or that doesn't belong to you); false reporting of our performance to the regulator, Ofwat, and other stakeholders, or the falsification of expense claims or invoices for payment.

To prevent fraud, we:

- encourage our people to be vigilant and to report any suspicions of fraud, providing you with suitable channels of communication and ensuring sensitive information is treated appropriately
- will rigorously investigate instances of alleged fraud
- will ensure that relevant cases are prosecuted, by assisting police and other appropriate authorities in any resulting prosecutions
- will take action against anyone involved in fraudulent activity
- will take necessary steps to recover any funds lost through fraudulent behaviour.



Fraud: doing the right thing

You must behave in a fair and honest way in any dealings both internally and externally.

You must operate within the law, keep normal ethical business standards and be alert to the possibility that unusual events or transactions could be indicators of fraud.

You must immediately report to the Group Financial Controller if you suspect that a fraud has been committed or if you see any acts or events which you consider are or may be suspicious. Alternatively, you can raise concerns via our whistleblowing hotline.

No one will suffer demotion, penalty or other adverse consequences for raising concerns regarding fraud. We will support all employees where the disclosures are made in good faith.

You must cooperate fully with internal checks, reviews or fraud investigations.

I. Fraud

Fraud: doing the wrong thing

If someone is suspected of fraud you should not contact them to determine facts, or demand restitution, or for any other reason.

Nor should you discuss the case, facts, suspicions, or allegations with anyone else, unless specifically asked to do so by a person appointed to investigate the alleged fraud. Failure to report activity which you suspect may be fraudulent may result in disciplinary action.

As well as the possibility of civil and criminal prosecution, failure to cooperate with an investigation into fraud could result in disciplinary action, which could result in dismissal for gross misconduct.

For more information

- Whistleblowing Policy

Preventing tax evasion: an overview

Anglian Water has a zero tolerance approach to tax evasion. Anglian Water will not permit or condone any form of tax evasion, regardless of whether it takes place directly or through third parties. The facilitation of tax evasion can lead to heavy fines as well as personal liability for directors, senior managers and individuals who are directly or indirectly involved.

If an employee, partner, agent or contractor facilitates tax evasion while performing services for or on behalf of Anglian Water, the company 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 the facilitation of tax evasion on its behalf.

Where we reasonably believe an incident of tax evasion has occurred it will be reported to the relevant authorities. Disciplinary action will be taken against any employee who is directly, or indirectly, involved in facilitating tax evasion.

Consideration will also be given to the termination of any contract with any partner, agent or contractor involved in facilitating tax evasion or which fails to have in place adequate procedures designed to prevent its employees, partners, agents and contractors from committing the offence on its behalf.

If you suspect that you or someone else has facilitated tax evasion, you should either inform your line manager or, if you suspect that your line manager may be involved, a senior manager. If you do not feel that your concerns have been adequately addressed, you should make a report under our Whistleblowing Policy. You will not be victimised or dismissed for blowing the whistle on criminal behaviour or other wrongdoing.

For more information

- Policy to Prevent the Criminal Facilitation of Tax Evasion

J. Bribery

Bribery: an overview

Bribery occurs when anything of value is given in order to encourage someone to perform their duty improperly or to reward them for having done so. The Bribery Act creates the following offences.

- giving bribes ('active offence'): It is an offence to promise, offer or give a bribe (whether directly or through a third party).
- receiving bribes ('passive offence'): It is an offence to request, receive or agree to receive a bribe.
- bribery of a foreign public official ('public offence'): It is an offence to bribe a foreign public official. The definition of a foreign public official covers both foreign government officials and individuals working for international organisations.
- failure of a commercial organisation to prevent bribery ('corporate offence'): A commercial organisation may be guilty of an offence if a person associated with that organisation commits an active offence or a public offence. It will, however, be a defence if an organisation has adequate procedures in place to prevent bribery.



Bribery: doing the right thing

It is important to draw a distinction between bribery and corporate hospitality. Corporate hospitality is generally used by companies to cement relationships and keep customers and suppliers up to date with changes in our business and the services that we offer. Corporate hospitality is acceptable provided that you comply with our Gifts and Corporate Hospitality Policy. 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 they may be involved in bribery, a senior manager or HR. If you don't feel that your concerns have been adequately addressed, you should raise them with the designated person in accordance with our Whistleblowing Policy. All employees must undertake anti-bribery training.



Bribery: doing the wrong thing

- Anyone found guilty of bribery can face up to 10 years in prison.
- In addition, both you and AWG Group as a company are subject to unlimited fines.
- Our Directors could be disqualified if it is found that we have failed to prevent bribery.
- Disciplinary action will be taken against any employee who is directly, or indirectly, involved in bribery, and possible dismissal may follow.
- Police involvement/legal action if the offence is deemed serious enough to warrant it.

For more information

- Anti-Bribery Policy
- Corporate Hospitality Policy and Guidelines
- Whistleblowing Policy
- Political and Charitable Donations Policy
- Procurement Policy

K. Gifts and corporate hospitality

Gifts and corporate hospitality: an overview

It is not uncommon to offer, or be offered business entertainment, hospitality or gifts. While this is generally not a problem, in some circumstances, it could be seen to be inappropriate by the business or those looking in from the outside. This in turn could lead to accusations of unfairness, bias or bribery.

It is important that we do not allow our decision-making to be influenced by the generosity of others and it is equally important that we do not try to influence others in a similar way. Therefore, as a rule, all offers of gifts and hospitality must be refused during a contract award period. This is basically the period from our formally initiating a tender through to contract signing.

Bribery is a criminal offence and it exposes us to the risk of prosecution, fines and imprisonment, as well as endangering our reputation. We therefore need to understand the circumstances when corporate hospitality or gifts can be accepted or provided and the process which should be followed.

Gifts

Subject to certain limited exceptions, gifts should be neither offered nor accepted. However, you will need to use your discretion when you think that refusal to accept a gift would cause offence. So long as a gift isn't offered by someone bidding for a contract in a contract award period and can't be construed as an inducement (e.g. to award a contract, to allocate work to a contractor or partner or to gain personal advantage or preferential treatment) it can be accepted in line with our policy.

- Gifts of a value less than £50 should be raffled to raise money for charity (e.g. WaterAid) or used for staff recognition incentives throughout the year. However, company-branded items of less than £20 may be kept by the recipient.
- Gifts of a value more than £50 should be passed to the WaterAid Committee to be used to raise money for charity. Alternatively, if there are a number of gifts given, they can be used for staff recognition if the individual value is less than £50.

Business entertainment and hospitality

Invitations to sporting or charity events may be accepted, provided that any invitation cannot be construed as an inducement. Attendance at such events must serve a legitimate business purpose, so if the person inviting you is not planning to be there, this is unlikely to be the case. Non-hosted events should be reported as gifts, rather than hospitality and the rules on the acceptance of gifts should be applied.

If you feel that not attending the event will be detrimental to the relationship, you should seek written approval in advance from your Business Unit Director. Attendance at events which take place during normal working hours should be taken as annual leave and all expenses incurred are your responsibility unless special dispensation has been given. Partners and children may attend events as long as the hospitality that is being offered still serves a legitimate business purpose (and provided that it cannot be construed as an inducement).

K. Gifts and corporate hospitality



Gifts and corporate hospitality: doing the right thing

If you are unsure whether you are able to accept a gift or offer of hospitality, ask yourself the following questions, which should help you to form your decision in line with the Policy.

Is it being made for the right reason? The offer of a gift should be given clearly as an act of appreciation for individual effort or contribution.

Does it place me under any obligation? The gift or hospitality should not place you under any obligation to accept or perform some other duty.

Is the offer being made openly? If made secretly and undocumented then the purpose of the offer will be open to question.

Is it too frequent? The giving or receiving of gifts or hospitality should not be a regular occurrence as this could lead to suggestions of improper behaviour.

Is it legal? Firstly, check with your line manager and if needed discuss with the Business Unit Director.

Am I comfortable with it? If not, speak to your line manager for advice. Ask whether you would be happy for it to be published within the company. If not, it's probably the wrong thing to do!

You must ensure that you always complete a 'Receipt/Giving of Corporate Gifts' entry on Workday and record all action taken before seeking approval with the exception of items valued less than £20 bearing company logos or adverts.



Gifts and corporate hospitality: doing the wrong thing

The consequences of failing to adhere to these guidelines are:

- possible disciplinary action for not disclosing gifts
- disciplinary action against anyone who is directly, or indirectly, involved in bribery (See Bribery section for more information).

For more information

- Anti-Bribery Policy
- Corporate Hospitality Policy and Guidelines
- Whistleblowing Policy

L. Competition

Competition Law: an overview

Competition is healthy in all forms of business, but only where there is a level playing field. Competition law is therefore designed to ensure that businesses in competition with each other compete fairly and, more importantly, that customers are not treated unfairly as a result.

The Competition Act focuses on two sorts of illegal behaviour:

- anti-competitive agreements (such as cartel activity resulting in price fixing or an agreement to carve up markets)
- abuse of a dominant position - relevant to companies which have a substantial share of a particular market.

As the monopoly supplier of water and water recycling services to households in our area, we have a dominant position in these markets and therefore have a special responsibility to treat potential competitors fairly. These competitors include companies who want to supply new developments in our area and companies who want to supply business customers in the Anglian region. Abuse involves unfairly exploiting customers or excluding rivals.

Examples include:

- charging unfairly high prices or unfairly low prices (i.e. prices that are below the cost of supply)
- charging discriminatory prices (i.e. prices which are different even though there is no objective reason for the difference)
- forcing customers to buy a whole range of services, not just a single service.

We must comply with the Competition Act, but there are also many good reasons why doing so is the right thing to do. Competition Act investigations are time consuming, expensive and disruptive and (if they lead to an adverse finding) can have serious consequences, including large corporate fines and severe reputational damage. There are also consequences for individuals as well as companies (including the potential for director disqualification).

L. Competition

Non-household retail market

The opening of the non-household retail market back in April 2017 allowed all eligible non-household customers - that is, business customers - to choose their water and sewerage supplier. When the market opened, Anglian Water stopped supplying retail services to business customers. Instead, those retail services (such as billing) were provided by retailers, which buy water and water recycling services from wholesalers (including Anglian Water) and resells those services to business customers.

The majority of business customers in our region are supplied by Wave, which is a joint venture between Anglian Water and Northumbrian Water. We have created a level playing field so that our wholesale business provides the same services (and offers the same prices) to Wave and to other retailers (including new entrants, of which there are many) who wish to supply services to business customers in the Anglian region.

Anglian Water wholesale and Wave now have an “arms- length” relationship in a number of ways, including the following:

- Wave operates from separate premises
- Wave has separate IT systems
- All Anglian Water employees understand that communications between our wholesale business and Wave must take place via appropriate channels (generally via the Wholesale Services Centre)
- Anglian Water does not take investment or operational decisions which are intended to favour Wave
- We comply with the Wholesale Retail Code. This Code governs the interactions between wholesalers and retailers and sets out the basis on which wholesalers and retailers communicate with the Market Operator.

All Anglian Water employees are required to complete relevant Competition Act training which is available on Workday.



L. Competition



Competition law: doing the right thing

The consequences for failing to adhere to our guidelines are:

- corporate fines as much as 10 per cent of Group turnover
- claims for damages by injured third parties
- serious damage to the Group's reputation
- agreements void and unenforceable
- disciplinary action and possible dismissal for employees.

You must ensure that you:

- are familiar with the principles of competition law
- can identify situations where competition law issues may arise
- appreciate the personal and corporate consequences of non-compliance with competition law
- are personally committed to achieving full compliance with our Competition Law Compliance Policy
- keep information confidential where it has been provided to Anglian Water by a third party who may be in competition with our retail business (Wave)

Everyone must undertake competition law compliance training, either online or through face-to-face training sessions. You should seek advice from the Legal team if you have any questions or concerns relating to competition law or if you are in any doubt about whether or not it may apply. If you are worried that a colleague may be exposing the company to Competition Act risks, you can report it to the Whistleblowing Hotline.



Competition law: doing the wrong thing

You should not:

- do anything to deliberately hinder our competitors
- show favouritism to any retailer, i.e. a company which supplies business customers - this includes Wave
- offer any opinion about the merits (or otherwise) of any retailer or any competitor to any other party (in particular, to business customers)
- provide information about one retailer to another, unless authorised to do so
- take unfair advantage of information we receive from third parties regarding competitive opportunities
- collude with another organisation to restrict competition
- enter into exclusive agreements with third party suppliers which have the effect of eliminating choice for customers.

The best way to avoid problems is by understanding the basic rules and seeking advice where appropriate. Claims of ignorance, good intentions or failure to seek timely legal advice will not be regarded as justification.

M. Modern slavery

Modern slavery: an overview

Anglian Water has a zero tolerance approach to any form of slavery or human trafficking, either within our business or our supply chain.

Anglian Water Services Ltd is required by the Modern Slavery Act 2015 to publish an annual statement on our website outlining how we ensure there is no slavery or human trafficking in our business or supply chain. The statement can be viewed on the homepage at www.anglianwater.co.uk.



Modern slavery: doing the right thing

We carry out pre-employment checks on all employees directly employed by a Group company and issue a written contract of employment. Information is provided to all new employees on their statutory rights including sick pay, holiday pay and any other benefits to which they may be entitled.

We have detailed procurement processes which must be followed at all times. These require all suppliers to demonstrate that they provide safe working conditions, treat workers with dignity and respect, act ethically and comply with all applicable legal requirements.

If you have any suspicions with regards to malpractice, illegal or underhand practices, either in Anglian Water or in any of our suppliers or contractors, please tell your line manager or contact the Whistleblowing Hotline.

There is also a national Modern Slavery helpline where you can report concerns that you have which do not relate to Anglian Water or our supply chains: 0800 0121 700.



N. Whistleblowing

Whistleblowing: an overview

Whistleblowing is the reporting of suspected malpractice, wrongdoing or other material concerns in relation to Anglian Water's activities, within our organisation or within our wider business (including our Alliance Partners and key suppliers). Anglian Water is committed to conducting its business with honesty, openness and integrity, and therefore takes seriously any form of malpractice, fraud and/or abuse within the workplace. In order to maintain high standards, it is essential that everyone working for Anglian Water feels able to raise any concerns they may have about how business is conducted.

If you have a concern you should read the full Whistleblowing Policy and Procedure. In many cases, your concern can be addressed by your immediate line manager and you should therefore speak to them in the first instance. However, if you feel unable to discuss your concern with your line manager for any reason, you should raise the issue through the whistleblowing facility. A concern can be raised by telephone, in person or in writing. If you wish, the concern can be raised anonymously (although you are encouraged to disclose your name).



Whistleblowing: doing the right thing

The Whistleblowing Policy and Procedure (which can be found in full on Lighthouse) should be used if you wish to raise a genuine concern about any of the following matters relating to Anglian Water:

- a criminal offence (e.g. bribery)
- a failure to comply with any legal obligations (e.g. breach of competition rules, infringing someone's intellectual property rights, breach of contract)
- a miscarriage of justice
- danger to the health and safety of an individual or the public
- damage to the environment; and/or
- the deliberate concealment of information relating to any of the above.

It does not matter if you are mistaken when you raise a concern, nor do you have to prove anything about the allegation you are making.

N. Whistleblowing

Whistleblowing Hotline: 0800 988 3868

Whistleblowing email: report@seehearspeakup.co.uk

You can also raise a report through the See Hear Speak Up website:

Website link: <https://www.seehearspeakup.co.uk/>

Username: Anglian Water

Password: Awaters89

Once an issue has been raised it will be appropriately investigated in the utmost confidence. Every effort will be made not to reveal the identity of an individual who raises a concern if that is their wish.

✗ Whistleblowing: doing the wrong thing

It should go without saying that concerns raised via the whistleblowing process should be genuine and the process should not be used as a way to 'settle scores' anonymously. If you raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation that you do not reasonably believe to be true, you may be liable to disciplinary action. Where you decide to raise your concern with an external body you must reasonably believe that the disclosure is made in the public interest.



Notes