

Anti-Bribery & Corruption Policy

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1. Introduction

- 1.1. Bribery and corruption remain major issues in world trade, despite efforts to prevent them. They are very damaging to the societies in which they occur:
- 1.2. They:
 - 1.2.1. divert money and other resources from those who need them most;
 - 1.2.2. hinder economic and social development;
 - 1.2.3. damage business, not least by increasing the cost of goods and services.
- 1.3. Our legal obligations are primarily covered by the Bribery Act 2010 (the “BA”). The BA affects us as a UK organisation if bribery occurs anywhere in our business.
- 1.4. We run our businesses with integrity and in an honest and ethical manner.

2. What does this policy cover?

- 2.1. This anti-bribery policy exists to set out the responsibilities of Castle Water employees and those who work for us regarding observing and upholding our zero-tolerance position on bribery and corruption.
- 2.2. It also exists to act as a source of information and guidance for those working for Castle Water. It helps them to be able to recognise and deal with bribery and corruption issues, as well as understand their responsibilities.
- 2.3. If you have any questions on this policy, please contact your line manager in the first instance.

3. What are bribery and corruption?

3.1.

Bribery	A form of corruption. It includes offering, promising, giving, accepting or seeking a bribe. A financial or other advantage, promised, requested, or given to induce a person to perform relevant function or activity improperly, or to reward them for doing so. This is likely to include cash or cash equivalent, gifts, meals, entertainment, services, loans, preferential treatment, discounts or anything else of value.
Corruption	Misuse of office or power for private gain.

- 3.2. The timing of bribes is irrelevant, and payments made after the relevant date will still be caught, as will bribes that are given or received unknowingly.
- 3.3. It is not necessary for the individual or organisation to actually receive any benefit as a result of the bribe.
- 3.4. All forms of bribery and corruption are strictly prohibited.

- 3.5. If you are unsure about whether an act constitutes bribery, raise it with your line manager and/or the human resources department who will advise accordingly.
- 3.6. This means that you must not:
 - 3.6.1. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received, or to reward any business received
 - 3.6.2. accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
 - 3.6.3. give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure.
- 3.7. No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about the possible bribery or corruption.

4. Our Position on Bribery and Corruption

- 4.1. Castle Water has zero-tolerance for bribery and corrupt activities by our employees and third-party representatives.
- 4.2. Castle Water is committed to conducting business in an ethical, legal and honest manner. We are committed to implementing and enforcing systems that ensure bribery is prevented.
- 4.3. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships.
- 4.4. Castle Water recognises that bribery and corruption would damage our reputation and expose us and our staff and third-party representatives, to the risk of fines and imprisonment. It is with this in mind; we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

5. Who is covered by the policy?

- 5.1. This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.
- 5.2. In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies – this includes their advisors, representatives and officials, politicians and public parties.

5.3. Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

6. What is and what is NOT acceptable?

6.1. This section of the policy refers to 4 areas:

- (i) Gifts and hospitality;
- (ii) Political contributions; and
- (iii) Charitable contributions.

6.2. Gifts and Hospitality:

6.2.1. Castle Water accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- (i) It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- (ii) It is not made with the suggestion that a return favour is expected.
- (iii) It complies with the law.
- (iv) It is given in the name of the company, not in an individual's name.
- (v) It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- (vi) It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- (vii) It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- (viii) It is given/received openly, not secretly.
- (ix) It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- (x) It is not above a certain excessive value, as pre-determined by the Castle Water's General Counsel (currently in excess of £100).
- (xi) It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Castle Water's General Counsel.

- 6.2.2. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the General Counsel, who will assess the circumstances.
- 6.2.3. Castle Water recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- 6.2.4. As good practice, gifts given and received should always be disclosed to the General Counsel. Gifts from suppliers should always be disclosed.
- 6.2.5. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the General Counsel should be sought.

6.3. Political Contributions

- 6.3.1. Political donations are contributions made to a politician, a political campaign or a political party.
- 6.3.2. You should be aware that such contributions can be seen as disguised bribes.
- 6.3.3. Castle Water will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage. No individual is to make a donation stated to be, or which could be taken to be, on behalf of this organisation.

6.4. Charitable Contributions

- 6.4.1. A charitable donation is a gift made by an individual or company to a non-profit organisation or charity.
- 6.4.2. A charity means any body of persons or trust established for charitable purposes only.
- 6.4.3. Charitable donations are commonly in the form of cash or other assets.
- 6.4.4. Bribes may be disguised as charitable donations. For that reason, any donations this organisation makes require approval at director level.
- 6.4.5. Whilst individuals may of course make personal donations to charity, they must not do so on behalf of Castle Water without approval.
- 6.4.6. Castle Water accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

- 6.4.7. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval.

7. Due Diligence

- 7.1. Castle Water will conduct due diligence on requests for approval of a large donation or those that raise concerns during the initial screening process to:
- 7.1.1. ascertain whether there is any connection between the political party or charity and any business transactions, organisations or individuals with which Castle Water is involved, or is likely to be involved
 - 7.1.2. ensure no foreign public official (FPO) is associated with the body gaining an advantage through the donation
 - 7.1.3. confirm the donation is appropriate and consistent with the needs of the recipient
 - 7.1.4. confirm the donation will not be diverted inappropriately, and
 - 7.1.5. determine whether the donation is consistent with any local laws
- 7.2. Should the due diligence process identify any cause for concern in relation to a donation, we will consider whether it is necessary to engage third parties to assist with further checks and enquiries or whether there is sufficient reason to refuse a request to make the donation.
- 7.3. As with all due diligence, the level of enquiry depends on the circumstances, and will be reasonable and proportionate.

8. Employee Responsibilities

- 8.1. As an employee of Castle Water, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- 8.2. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- 8.3. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the human resources department or the General Counsel.
- 8.4. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Castle Water has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

9. Raising Concerns:

- 9.1. This section of the policy covers 3 areas:

- (i) How to raise a concern.

(ii) What to do if you are a victim of bribery or corruption?

(iii) Protection.

9.2. How to raise a concern:

9.2.1. If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Castle Water, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, director, the human resources department, or the General Counsel.

9.2.2. Castle Water will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

9.2.3. Castle Water will investigate all allegations immediately and thoroughly.

9.3. What to do if you are a victim of bribery or corruption?

9.3.1. You must tell the human resources department or the General Counsel as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

9.4. Protection:

9.4.1. If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Castle Water understands that you may feel worried about potential repercussions. Castle Water will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

9.4.2. Castle Water will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

9.4.3. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

9.4.4. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the General Counsel immediately.

10. Training and communication

10.1. Castle Water will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

- 10.2. Castle Water's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.
- 10.3. Castle Water will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

11. Record keeping

Castle Water will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

12. Monitoring and reviewing

- 12.1. This policy will be monitored and reviewed on an annual basis. We will assess its suitability, adequacy, and effectiveness.
- 12.2. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- 12.3. Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the General Counsel.
- 12.4. This policy does not form part of an employee's contract of employment and Castle Water may amend it at any time so to improve its effectiveness at combatting bribery and corruption.