Our honest and ethical behaviour policy

Policy no. POL028
Promoting honesty and integrity

To provide the best possible service and safeguard our employees, we’re committed to conducting all aspects of our business in an honest, ethical and transparent manner.

We aim to build a diverse, inclusive and open environment that empowers employees to speak up, ask questions and make ethical choices, every single day.

To protect our integrity, we own up to our mistakes and put things right if we get them wrong. We refuse to tolerate acts of bullying, harassment, fraud, bribery, price fixing, theft of assets or data, trafficking, slavery, discrimination or any other forms of exploitation or dishonesty.

Most importantly, we put our customers at the heart of everything we do, complying fully with all our legal responsibilities and protecting their privacy.

What an honest workplace looks like

To build trust with our customers, employees, suppliers and the wider community, we commit to:

- **Acting honestly and responsibility**
  We take dishonesty seriously. Any contraventions of the Bribery Act 2010 and the Competition Act 2010 may expose us to criminal liability, and we’ll treat acts of dishonesty as a criminal offence.

- **Taking a zero-tolerance attitude towards bullying, harassment, discrimination or victimisation**
  We’ll investigate all reports carefully and take disciplinary action if necessary.

- **Being on the alert for tax evasion**
  If any employee deliberately facilitates tax evasion, we’ll report them to the authorities and support prosecution however we can.

- **Protecting against modern-day slavery**
  Our supplier contracts include an explicit prohibition against the use of forced or trafficked labour. We expect all our suppliers to hold their own suppliers to the same high standards.

Employee responsibilities

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<th>Executives must conduct all business in line with this policy and our core business values, being open and transparent about our plans for the future.</th>
<th>Line managers <strong>must communicate the details of this policy to employees and contractors</strong>, promoting a supportive working environment.</th>
<th>All employees and contractors must take responsibility for their actions and speak up if something doesn’t look right.</th>
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Any breaches of this policy may lead to disciplinary action, criminal prosecution and/or civil recovery proceedings.
When to speak up
As an employee, you commit to:

- Reporting any instances of dishonesty, malpractice, bullying, harassment, discrimination or victimisation
- Declaring any offer of a gift, hospitality or other service that may have a monetary value above £50, including from third-party contractors, alliance members and business partners working on our behalf
- Declaring any conflicts of interest, no matter how small, to prevent damage to your own reputation and credibility as well as our financial and/or reputational interests

Tell your line manager
This doesn’t have to be your immediate line manager

Speak to us in confidence
07747 640 072 investigations@thameswater.co.uk

Report anonymously
0800 917 6936 thameswaterspeakup.co.uk

Write to the CEO
Thames Water Utilities Ltd
Clearwater Court
Reading RG1 8DB

Useful references

Internal:
- Employee Code of Conduct
- Probity Form
- Investigation Response Plan
- Competition Compliance Policy
- Competition Compliance Manual

External:
- Corporate Criminal Offence of Failure to Prevent Facilitation of Tax Evasion
- Criminal Finances Act 2017
- Theft Act 1968
- Public Interest Disclosure Act 1998
- Fraud Act 2006
- Bribery Act 2010
- Competition Act 1998
- The Modern Slavery Act 2015

Who this policy applies to
This policy applies to the Kemble Group of companies, including all employees, suppliers, third-party contractors and partners working for and on behalf of Thames Water. It also applies to agents, consultants or trade bodies who lobby on our behalf or represent us in government matters.

We’ll review and update this policy on a regular basis.

Brandon Rennet, Chief Financial Officer, November 2019