

Anti-Bribery and Corruption policy

SES Water, which is the trading name of Sutton and East Surrey Water plc, has zero tolerance of bribery and corruption, and is committed to be fully compliant with the requirements of the Bribery Act 2010 and other applicable anti-bribery laws, rules, and regulations. Maintaining lawful business practices is of paramount importance to us and this is reflected in our core values, one of which is Integrity. We are committed to acting fairly and with integrity in all our business activities and to implementing and continuously improving effective systems to counter corruption and bribery.

SES Water is committed to:

- Acting with integrity and upholding our core values by operating in an ethical, professional, and lawful manner at all times
- Not offering or accepting bribes, nor condoning bribes offered or accepted on our behalf
- Ensuring that those working for SES Water or on our behalf know our principles and effectively recognise, prevent, and report any suspected instances of bribery or corruption
- Providing confidential, secure, and suitable channels of communication and reporting
- Ensuring that any information reported to us is fully investigated and is properly and effectively dealt with
- Taking disciplinary action against anyone involved in bribery.

Bribery is “offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties” (ISO 37001:2016).

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe. All employees and those carrying out work on our behalf are expected to strictly adhere to the guidelines set out in this policy.

This policy is reviewed on an annual basis, and if necessary updated to ensure that it continues to reflect our anti-bribery objectives, key values, and business strategy.

A handwritten signature in black ink that reads "Ian Cain".

Ian Cain

Chief Executive Officer

June 2021