

---

# Gifts and Hospitality Policy

## Purpose

As recognised in Government guidance, giving and receiving gifts and hospitality can play an important role in developing business relationships. This Policy sets out Pennon's approach to ensure all gifts and hospitality are not made or received for an improper purpose.

## Scope and Application

The Group General Counsel and Company Secretary is responsible for this Policy. It has been approved by the Pennon Group Board and applies across the Pennon Group and its subsidiary companies ("**Group**"). The Policy applies to all Group colleagues and those working on our behalf.

This Policy should be read alongside the Code of Conduct and the Anti Financial Crime Policy.

## When is a Gift or hospitality not appropriate?

A good way to judge if a gift or hospitality is appropriate is to consider whether the intention of the gift or hospitality is to bring about the improper performance by another person of their role or to reward such improper performance. If so, this will be deemed a bribe and should therefore not be offered or received. Please refer to the Group Anti-Financial Crime Policy for further details on the Bribery Act 2010.

The most important thing to remember is that gifts or hospitality, given or received, must have a clear relationship building business reason which is:

- not linked to a transaction or appointment; and
- not for the employee's or their family's personal enjoyment.

If you are unsure, do not provide or accept anything until you have discussed it with the Head of Legal Compliance: [legalcompliance@pennon-group.co.uk](mailto:legalcompliance@pennon-group.co.uk)

## Your Responsibilities

You are required to read, understand, and comply with this Policy.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

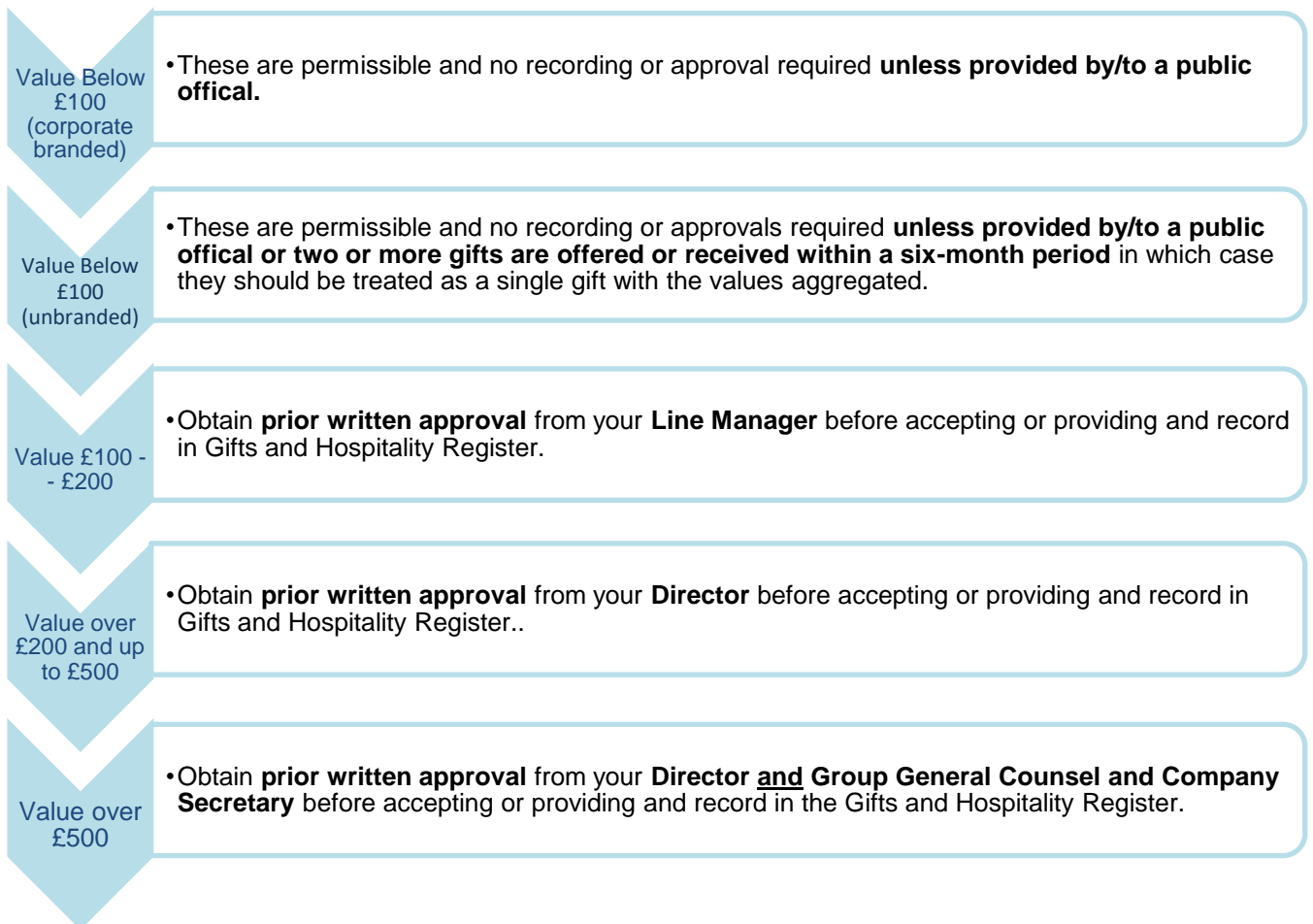
Irrespective of monetary value, if you are contemplating offering a gift or hospitality, you must:

- ensure the proposed gift or offer of hospitality is consistent with the external organisation's Gifts and Hospitality Policy; and
- seek the prior written approval of the Head of Legal Compliance if the proposed recipient is a public official e.g. employee of the EA, DEFRA or Ofwat.

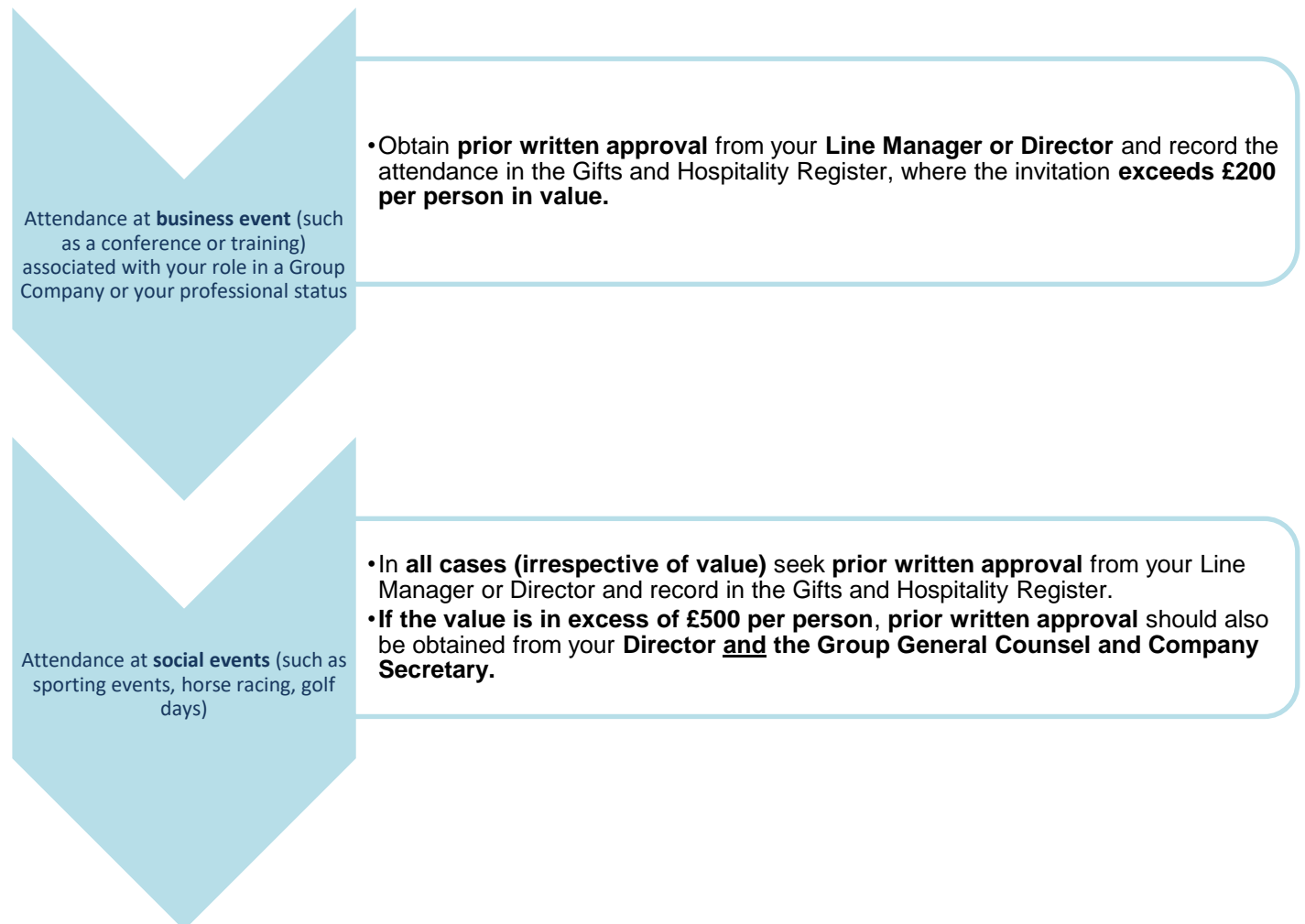
Accepting or offering cash gifts is **not permitted** and is highly likely to be seen as a bribe.

For all other gifts or hospitality (in excess of the approval thresholds set out below) you are required to seek approval and make an entry in the Gifts and Hospitality Register which can be found here: <https://swwater.sharepoint.com/sites/compliance>.

## Approval Thresholds for Gifts



## Approval Thresholds for Hospitality



## How to raise a concern

If you suspect that an employee has accepted or provided Gifts or Hospitality (without the requisite approval) in connection with Pennon's business, we want you to Speak Up. You may routinely inform your manager of concerns or Pennon Legal Compliance ([legalcompliance@pennon-group.co.uk](mailto:legalcompliance@pennon-group.co.uk)), but you also have access to our independent, anonymous and confidential Speak Up whistleblowing helpline (**0808 196 5852**) or online at [www.pennongroup.ethicspoint.com](http://www.pennongroup.ethicspoint.com).

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting any reasonably-held suspicion of any breach of this policy.

## Training

Training on this Policy is to be provided to all new staff through the Code of Conduct training and annual refresher training thereafter.

---

## Consequences of Breaching this Policy

Any employee who breaches this Policy will face disciplinary action, up to and including termination of employment and/or prosecution. We may cease conducting business with individuals and organisations working on our behalf if they breach this Policy.

## Queries

Any queries regarding the Policy should be directed to the Head of Legal Compliance: [legalcompliance@pennon-group.co.uk](mailto:legalcompliance@pennon-group.co.uk)

## VERSION HISTORY

This section of the Policy should be completed to detail changes made to the Policy.

VERSION	STATUS	AREA OF CHANGES	DESCRIPTION OF CHANGES	APPROVED BY	DATE OF RELEASE DD/MM/YYYY
6.0	Current	All	Final Version	Pennon Board	26/09/24