

# Anti-bribery and corruption policy

UNITED UTILITIES POLICY STATEMENT | MARCH 2026

Our purpose is to provide great water for a stronger, greener and healthier North West. It is imperative that in delivering our purpose we conduct ourselves to the highest standard of behaviour.

Our Anti-bribery and corruption policy supports our purpose and sets out our commitment to how we do business and deliver such a vital service. Acting at all times with integrity and within the law will give our customers, regulators our partners, suppliers, investors and the wider community the confidence to trust in us.

United Utilities forbids any employee to offer or accept any payment, gift, entertainment, hospitality or service, political contribution, charitable donation or sponsorship for the purpose of inducing any person or organisation to carry out their duties or functions improperly. This policy applies to any dealings with private individuals, public and private sector employees, foreign public officials and public and private sector organisations.

We will ensure adequate anti bribery and corruption procedures are in place based on the Ministry of Justice and the Home Office six principles.

- Top level commitment
- Risk assessment
- Due diligence
- Proportionate procedures to prevent incidences
- Communication – including training
- Monitoring and review

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## We will do the right thing by:

- the group not tolerating corruption, bribery or anti-competitive actions;
- ensuring a culture exists where bribery and corruption is never acceptable;
- the top-level management having ownership of and responsibility for the UU compliance programme;
- having a whistleblowing policy and a confidential whistleblowing line which allows individuals to raise concerns about any possible wrongdoing on an anonymous basis;
- ensuring we have clear documentation describing how UU conducts business including defining financial controls, required authorisations, approvals, and governance arrangements;
- providing training on how to recognise inappropriate behaviour, including fraud, anticompetitive practices, abuse of a dominant market position and facilitation payments;
- cooperating fully with audits, reviews and investigations;
- reporting our bribery compliance statistics within the Annual Performance Report;
- detailing our approach by setting out the standards that must be observed both by UU and the organisations we deal with; and
- implementing and maintaining policies, processes and internal controls to enable compliance with legislation, regulatory and relevant obligations.

## We will make it happen by:

- maintaining the group's hospitality policy in order for colleagues to be compliant. The hospitality policy permits colleagues to accept proportionate and reasonable hospitality for legitimate business purposes only and all hospitality (and gifts) offered and accepted must be logged and approved when accepted;
- conducting a cross-business fraud risk assessment through the security steering group to identify and understand potential threats, optimise the group's response and mitigation, and ensure consistency across the business;
- colleagues and representatives of the group's suppliers complying with the group's responsible sourcing principles and United Supply Chain approach;
- ensuring any matter raised under the whistleblowing policy is investigated thoroughly and promptly with appropriate actions taken;
- undertaking a periodic role-based risk assessment to ensure that there is an understanding of the level of risk across the organisation;
- individuals identified by the role-based risk assessment undertaking mandatory compliance training;
- conducting audits to ensure processes are compliant, adequate and adhere to our main principles; and
- maintaining the CIPS Corporate Ethics kite mark.

## We will be better by:

- conducting regular internal and external audit activity to review the effectiveness of risk and control procedures;
- conducting multiple levels of assurance to give confidence that the anti-bribery and corruption controls in place are working effectively;
- requiring senior managers, in consultation with their teams, to confirm that they have complied with the group's anti-bribery and hospitality policies;
- conducting regular reviews of recent case law and prosecutions to identify where risks may arise; and
- reviewing this policy every three years.



**Louise Beardmore**  
Chief Executive