



CORPORATE HOSPITALITY GUIDELINES & PROCEDURES

JANUARY 2024

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1. PURPOSE

- 1.1 The purpose of this document is to ensure that employees understand the circumstances when corporate hospitality or gifts can be accepted or provided, and to detail the process employees should follow. Bribery is a criminal offence and it exposes the Company and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation.

2. SCOPE

- 2.1 This is a group level policy that applies to all employees of Anglian Water Group Limited, with the exception of Anglian Water (Ireland) Limited and Wave Limited (and their respective subsidiaries, which include Celtic Anglian Water and Anglian Water Business (National)).

3. STATUS

- 3.1 The guidelines/procedures are subject to regular review by the Company and are updated as appropriate.

4. OWNER

- 4.1 Head of Employee Relations.

5. POLICY

- 5.1 All employees must complete the mandatory Bribery Act training available on Workday as an e-Learning module. To access, sign into [Workday](#) and go to Learning. The Company's Anti-Bribery Policy can be found [here](#).

5.2 Acceptance of Gifts

- 5.2.1 It is Company policy that gifts should be neither offered nor accepted, subject to the exceptions set out below. Employees need to use their discretion when refusal to accept a gift would cause offence.
- 5.2.2 As long as a gift is not offered by someone involved in bidding for a contract and it cannot be construed as an inducement, e.g. to award a contract, to allocate work to a contractor or partner, or to gain personal advantage or preferential treatment, it can be accepted, in line with our policy, but with a number of exceptions.
- 5.2.3 Where a gift is accepted (because it would cause offence to refuse it) the recommended approaches are:
- Where gifts are of a value less than £50 the team, may raffle these to raise money for charity, (for instance, for WaterAid, details of which can be found on [Lighthouse](#)). An acknowledgement of the donation should be obtained from the local WaterAid representative.
 - Gifts valued at less than £50 could be kept, as long as they are used for staff recognition throughout the year. These gifts must be reported.

- Items like branded diaries and calendars can be kept, and do not need reporting if they are worth less than £20.
- Individual items valued at less than £50 (e.g. individual bottles of wine from a case or concert tickets), can be used as staff recognition.
- Multiple items or items with a value of more than £50 must be passed to the WaterAid Committee so that they can be used to raise money for the charity. Details of local WaterAid representatives can be found on [Lighthouse](#).

5.2.4 Employees must **always** complete an 'Acceptance of Corporate Hospitality' or 'Acceptance of Corporate Gift' entry in the Requests area of Workday and record all action taken before seeking approval with the exception of items valued less than £20 bearing company logos or adverts.

5.3 Acceptance of Corporate Hospitality

5.3.1 Invitations to events such as sporting events or charity events (this includes WaterAid events) may be accepted providing any invitation cannot be construed as an inducement, e.g. to award a contract, to allocate work to an Alliance partner or to gain personal advantage or preferential treatment.

5.3.2 To avoid any perceived inducement or bribe, no hospitality should be accepted during a contract award period by either (a) anyone who is involved in the bidding process or (b) anyone who is likely to be in a position to influence the procurement strategy (e.g. members of the senior management team). The contract award period is defined as the period from formally initiating a tender release through to contract signing. In addition, offers must be declined if an offer is made of hospitality outside of a contract award period, but the event is likely to be within a contract award period. It is the responsibility of everyone and not just the Sourcing Managers to ensure there is no impropriety or the potential appearance of impropriety.

5.3.3 If there is any doubt as to whether an employee can accept an offer of corporate hospitality, they should contact a member of the Legal or HR team (or by Business Unit Director), for clarification or approval.

5.3.4 Where employees have been offered corporate hospitality but the third party company will not be attending, this should be reported as a gift, rather than hospitality.

5.3.5 Events may be attended if it could be detrimental to the relationship and would cause offence not to accept the invitation.

5.3.6 If an employee wishes to accept an invitation they must get written approval in advance from their Business Unit Director.

5.3.7 Normally, if invitations to events are accepted, employees should take annual leave to attend the event if it falls on a normal working day. The employee is responsible for all personal expenses incurred that are not provided by the supplier within the corporate hospitality, e.g. train fares or fuel. The exception is if the Business Unit Director requires the employee to attend for the benefit of the Company; in these circumstances, annual leave does not need to be taken and expenses can be claimed

in line with the Expenses Policy (coded to 'Other' on the 'External Entertainment' link on Workday). The Company's Expenses Policy can be viewed [here](#).

5.4 Providing gifts or corporate hospitality to third parties

5.4.1 Gifts or corporate hospitality must be offered by the Company only in recognition of a significant effort or contribution to the Company. Consideration should be given to the appropriateness of the gift or corporate hospitality to ensure it would not cause offence to the recipient or be an inappropriate reflection on the Company.

5.4.2 Any costs incurred must be coded to 'Gifts' or 'Other' via the 'External Entertainment' link on Workday Expenses. Gifts must not exceed the approved level, which is currently £20.

5.4.3 If gifts or corporate hospitality are provided, written consent must be obtained in advance by the Line Manager and Business Unit Director. During a contract award period (as described above), a 'closed period' will operate whereby no hospitality **at all** can be offered under any circumstances. It is the responsibility of all involved in the procurement process and not just Sourcing Lead Business Partners to ensure that there is no impropriety or the potential appearance of impropriety.

[Appendix 1](#) provides helpful guidance, i.e. definitions and scenarios to help provide clarification on what constitutes a gift/hospitality and the response required.

6. RECORDS

6.1 Requests for approval for the acceptance/provision of gifts or hospitality are made via the Workday system. Employees are responsible for making the requests, by selecting 'Requests' on their Workday homepage and then selecting the 'Acceptance of Corporate Hospitality' or 'Acceptance of Corporate Gift' option. The request will be sent automatically to the relevant manager for approval. Paper forms should not be retained or sent to People & Payroll Services as these will be held electronically within Workday.

6.2 Where a gift or hospitality is offered and subsequently refused, for whatever reason, this should be recorded using the 'Refusal of Corporate Hospitality/Gift' option on Workday. This is not required for invites to business meetings with lunch.

6.3 The same policy applies to Business Unit Directors, who should get approval from their Line Manager.

7.0 MONITORING

7.1 People & Payroll Services will perform regular audits of submitted reports to ensure compliance with the policy. In addition, ad hoc enquiries will be made to ensure employees are gaining the appropriate authorisation.

7.2 Where an employee submits more than six forms over a 12-month period or the individual gift/hospitality accepted is in excess of £250, these cases will be highlighted to the employee's Line Manager for investigation.

8. POTENTIAL BREACHES OF POLICY

- 8.1 An allegation of bribery can seriously damage the Company's reputation. Line Managers must inform their Senior Manager or Business Unit Director if they believe that an offer or acceptance of a gift could be perceived as a bribe.
- 8.2 In exceptional cases, where there is sufficient evidence that a bribe has been offered, the Line Manager must contact the Legal team to arrange for appropriate action to be taken by the Company.
- 8.3 Employees are required to follow the Corporate Hospitality Policy. Failure to comply with the policy may result in disciplinary action up to and including dismissal, and in extreme cases prosecution, fines or imprisonment.

9. FURTHER ASSISTANCE

For general queries or for advice and guidance on the application of this policy and guidelines please contact your Employee Relations Manager / Employee Relations Advisor. Details of the areas covered by each ERM/ERA can be accessed [here](#).

LAST REVIEWED

January 2024

Appendix 1**CORPORATE HOSPITALITY GUIDELINES****DEFINITIONS**

Corporate Hospitality covers invitations to social functions, sporting events, charity events, meals and entertainment.

Gifts cover gifts or customary tokens of appreciation.

Business Expenses covers meals, entertaining and recognition where the primary focus is on business related matters.

SCENARIOS

The following non-exhaustive scenarios are designed to provide some guidance:

Scenario	Definition	Action
A bottle of wine is given to an employee as a Christmas goodwill gesture from a supplier.	Gift	Give the gift to charity (e.g. WaterAid raffle).
A lunchtime meeting with a supplier is arranged and lunch is provided by the supplier. Formal business matters will be discussed.	Business Expenses	Any expenses incurred may be claimed in line with the Expenses Policy
Tickets to a rugby cup final are offered by one of our partner companies, with full use of a corporate box. Employees from the partner company will also be attending, but no business matters will be formally discussed.	Corporate Hospitality	Must get approval in advance of accepting from BU Director. Employee is responsible for all personal expenses incurred and must use annual leave if during work time.
A trip on the London Eye with an overnight stay is offered by a supplier. This is for the employee and a guest/colleague to attend with the Supplier.	Corporate Hospitality	Must get approval in advance of accepting from BU Director. Employee is responsible for all personal expenses incurred and must use annual leave if during work time.
Employee is offered 2 tickets to Rugby match at Twickenham and the event will not be hosted.	Gift	Must be declined
An invitation to another company's annual awards ceremony representing Anglian Water, where we may or may not have been nominated.	Business Expenses	Any expenses incurred may be claimed in line with the Expenses Policy and does not require annual leave to be taken.
An offer to use a supplier's company private villa in Monaco for a weekend away. This is sole use for the employee and a guest. The Supplier would not be staying in the Villa at the same time.	Gift	Must be declined.

An invitation to another company's team building day, which is in a social setting (i.e. away from the workplace), but where business matters will be discussed throughout the day (for example, business updates, how teams can work better together).	Business Expenses	Any expenses incurred may be claimed in line with the Expenses Policy and does not require annual leave to be taken.
An employee who has a working relationship with a supplier accepts private services from that supplier for his personal benefit (e.g. Supplier tarmacs employee's driveway at the weekend free of charge).	Gift	Must be declined. However, if the employee is offered and pays market rates for a service this would be acceptable.
An invitation from a contractor to attend a WaterAid event as their guest.	Corporate Hospitality	Must get approval in advance of accepting from BU Director. Employee is responsible for all personal expenses incurred and must use annual leave if during work time.

NOT SURE WHAT TO DO?

Then ask yourself:

Is it being made for the right reason?

If a gift or hospitality, it should be given clearly as an act of appreciation for individual effort or contribution.

Does it place me under an obligation?

The gift or hospitality should not place the recipient under any obligation either explicit or implicit.

Is the offer made openly?

If made secretly and undocumented then the purpose will be open to question.

Is it too frequent?

The giving or receiving should not be a regular happening between the giver and recipient.

Is it legal?

Firstly, check with your line manager and if needed discuss with the Business Unit Director.

Is it consistent with our Values and our Code of Conduct?

Consider what you are doing – ask yourself if it's what we stand for as a company?

Am I personally comfortable with it?

If not, speak to your line manager for advice.

Would I be happy for it to be on Lighthouse or Panorama?

If not, it's probably the wrong thing to do!