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HWM-Water Limited and HWM Companies (HWM)

Anti-Bribery Policy – January 2021

Principles

Bribery is a criminal offence, defined as:

“The offer, promise or gift of financial or other advantage, with the intention of inducing or rewarding the improper performance of a function or activity”.

It does not matter if:

- The person offering the bribe is the person who will benefit from the improper performance.
- The person receiving the bribe is the person who will carry out the improper performance.

Policy

The Group, from the Halma plc Board down, has a zero-tolerance attitude towards bribery and corrupt practises in all its business dealings. Such practises are never acceptable and will not be tolerated. Therefore:

- You should never accept a bribe
- You should never seek to influence the actions of a third party toward Halma by offering or paying a bribe.
- You should never ask or authorise an Associated Person or any other business partner to offer or pay a bribe on your behalf.

Guidance

At its most basic level, a bribe is an improper financial payback such as a kickback. However, because a bribe actually involves the offer of an advantage, there are action beyond a simple payment which might be seen as corrupt. For example:

- [Giving or receiving excessive hospitality and gifts](#)
- [Making inappropriate charitable donations](#)
- [Making or providing political payments and support](#)
- [Making facilitation payments](#)
- [Making payments to intermediaries disproportionate to the service provided](#)



A **Halma** company

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