

Policies



Environmental Policy

We have established this environmental policy to be consistent with the purpose and context of our organisation. It provides a framework for the setting and review of environmental objectives in addition to our commitment towards the following:

- Protect the environment, including the prevention of pollution
- To sustainable resource use, climate change mitigation, protection of biodiversity and ecosystems
- Conform to applicable legislative, regulatory and compliance obligations
- Continually improve and enhance environmental performance

This policy is communicated to all interested parties.

Anti Corruption and Bribery Policy

1. Policy Statement

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.
- 1.2 We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2. Who Must Comply With This Policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

3. What Are Bribery And Corruption?

- 3.1 Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- 3.2 An advantage includes money, gifts, loans, fees, services, discounts, the award of a contract or anything else of value.
- 3.3 A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.
- 3.4 Corruption is the abuse of entrusted power or position for private gain.

4. What You Must Not Do

It is not acceptable for you (or someone on your behalf) to:

- (a) give, promise to give, or offer, a payment, gift with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - (b) give or accept a gift during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
 - (c) accept a payment, gift from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
 - (d) accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
 - (e) offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your manager.
 - (f) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - (g) engage in any other activity that might lead to a breach of this policy.
- 4.2 Kickbacks are typically payments made in return for a business favour or advantage.
- 4.3 You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your manager.

5. Gifts, Hospitality And Expenses

5.1 This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- (a) establishing or maintaining good business relationships;
- (b) improving or maintaining our image or reputation; or
- (c) marketing or presenting our products and/or services effectively.

5.2 You are prohibited from [accepting a gift from or] giving a gift to a third party OR The giving [and accepting] of gifts is allowed if the following requirements are met:

- (a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- (b) it is given in our name, not in your name;
- (c) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (d) it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas;
- (e) it is given openly, not secretly; and
- (f) it complies with any applicable local law.

5.3 Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

5.4 Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

5.5 We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

6. Donations

- 6.1 We do not make contributions to political parties.
- 6.2 We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Chief Executive.

7. Record-Keeping

- 7.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 7.2 You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.
- 7.3 You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 7.4 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness.

8. Your Responsibilities

- 8.1 You must ensure that you read, understand and comply with this policy.
- 8.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 8.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

9. Breaches Of This Policy

- 9.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Corporate Social Responsibilities Policies

In 2020, Intellitect Water Limited (IWL) reaffirmed its Corporate Social Responsibilities policies, by codifying them into four commitments – to its staff, to its clients, to its suppliers, and to the environment.

Staff

IWL aims to achieve the happiness of all its employees through their worthwhile and satisfying employment in a successful business. Through participation in the company's policies, they share the responsibilities of direction as well as its rewards – profit, knowledge and advancement. All employees have the opportunity to increase their knowledge and have a voice in the way in which the business is run. This helps to make their jobs more satisfying, supporting the long-term success of the business.

Clients

IWL aims to offer outstanding value, choice and service to its clients, although we recognise that in a competitive marketplace, loyalty will depend on a number of increasingly complex factors. In practice this means that our technical teams maintain rigorous product safety processes and standards, while IWL commercial team works with suppliers to improve the value of the products and services we provide and to encourage and enable clients to maximise the potential of their own businesses.

Suppliers

IWL recognises that the world's population and economies are continuing to grow; global power is shifting to new emerging markets and the competition for resources is becoming more intense. Our approach is to secure long term sustainable supply chains based on fair and transparent trade conditions. This means we can continue to provide our clients with quality products they can trust. Working with experts, we are gaining a more sophisticated understanding of our supply chains, the people who work in them and the raw materials and processes used in our equipment.

Environment

IWL recognises the changing environmental concerns of the growing global population and aims to embed these concerns within every level of our design and construction processes. All of IWL's products will be subjected to new and improved processes as part of our commitment to our environmental targets.

Slavery and Human Trafficking Policy

Forced, bonded or compulsory labour, human trafficking and other kinds of slavery and servitude represent some of the gravest forms of human rights abuse in any society. We will not tolerate any such activities within our own operations or within our supply chain and are committed to taking appropriate steps to ensure that everyone who works for us in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected. While this is our first public statement addressing these issues in line with the requirements of the new UK Modern Slavery Act (2015), we have been focused on the rights and well being of the people who work for us for many years.

Beliefs and principles

We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct employee or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations.

Respect for the dignity of the individual – and the importance of each individual’s human rights – form the basis of the behaviours we expect in every workplace worldwide. We will not accept any form of discrimination, harassment or bullying and we require all of our management staff to implement policies designed to increase equality of opportunity and inclusion for all employees.

Codes and policies

Our code of conduct underpins everything we do. The code is mandatory and extends to every individual working for or on behalf of Intellitect Water. The code requires all of us to act ethically and comply with legal requirements at all times, putting our principles into practice in everything we do.

This code of conduct has been updated to expand the references to human rights:

We respect all internationally proclaimed human rights, including the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our business operations.

Monitoring and compliance

Potential new suppliers rated as higher risk are required to provide evidence that they operate ethically and responsibly in line with our requirements; this may include a third party audit by a credible independent source. The supporting data provided is then reviewed by the relevant policy and operational experts within Intellitect who will reject a supplier from being on-boarded if they do not meet our requirements and, in the company’s view, have no prospect of doing so even with support and remediation. If the information provided is found to be unsatisfactory, further on-site assessment may be required to verify compliance with the standards set out in the code. If a new supplier is found to be non-compliant, where feasible we try to work with them to help enhance their capabilities and address the issues of concern.