

ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Policy Number: POL-LEG08

Executive Sponsor: EVP, General Counsel & Corporate Secretary

Applicability: American Water Works Company, Inc., and its controlled subsidiaries as described below (together “American Water” or the “Company”)

Document Approver: Chief Compliance Officer

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Document Owner: Compliance & Ethics Manager

I. PURPOSE

At American Water, how we execute on our strategies is just as important as achieving our goals. This Policy reinforces our commitment to working ethically and maintaining the highest level of integrity when conducting business on behalf of the Company. We must be truthful and transparent in our interactions with our business partners, Governments and Government Officials. American Water has a long-standing commitment to strictly complying with all anti-corruption laws applicable to the states and federal installations in which we operate. Bribes, kickbacks, and other similar payments to or from third-parties are prohibited. You should never offer, make or agree to such payments.

II. POLICY STATEMENT

All Company activities in the private and government sectors are to be carried out with the highest standard of integrity and in accordance with all relevant laws and regulations. The same integrity is expected of anyone with whom we do business. Corrupt practices are not acceptable. American Water's dealings with Governments and Government Officials are subject to specific anticorruption laws which carry significant penalties.

It is illegal to bribe a Government Official or anyone acting on such official's behalf to affect any governmental act or decision, obtain or retain business, or gain an improper business advantage. Offering or making such a bribe, promise, payment, or anything of value may expose you and the Company to criminal prosecution and serious penalties under U.S. law. Importantly, the acts of our third parties may also expose us to such penalties, even if we are not involved in or aware of their actions. Therefore, it is vital that third parties are selected in strict compliance with the principles outlined in this Policy.

III. RESPONSIBILITIES

All employees are responsible for complying with this policy. Under no circumstance will any employee give, pay, offer, promise to pay or authorize the giving or payment of money or anything of value to any Government Official to obtain or keep business or to secure some other Improper Advantage. Applicable corruption laws prohibit the giving of anything of value to influence a Government Official's actions. Additionally, gifts, hospitality, and other items of value must not be used in a manner that may violate anti-kickback, anti-corruption, state election laws, federal laws or rules prohibiting influence of government officials or transactions, the Company's Political Contribution Policy, or our Code of Ethics. Prohibited payments include, but are not limited to, those designed to:

- Induce the recipient to award a contract to the Company;
- Obtain advantageous treatment that would not otherwise be available to the Company; or
- Circumvent or cause non-enforcement of laws or regulations applicable to the Company.

American Water also prohibits commercial bribery. Commercial bribery involves a situation where something of value is given to or received from a current or prospective business partner with the intent to improperly obtain business or corruptly influence a business decision.

Bribes are not always in the form of money. Bribery also includes providing business opportunities, favorable contracts, offers of employment and gifts and entertainment to a Government Official or third party.

To avoid being held liable for corrupt third-party payments, employees must exercise due diligence and take all necessary precautions to help ensure that business relationships are formed with reputable and qualified partners, agents, and representatives.

Employees may not ignore or disregard circumstances that could reasonably be considered sufficient warning that illegal conduct will occur.

If an employee has Knowledge of a possible violation of this Policy, it must be reported to a member of the Legal Department, the Compliance and Ethics Department or the confidential ethics hotline. You can reach the ethics hotline at 1-877-207-4888.

American Water will not allow any retaliation against any employee who makes a good faith report of a violation of this Policy. The Company will investigate reported violations and will determine an appropriate response, including corrective action and preventative measures. All reports will be treated confidentially to the extent possible.

IV. DEFINITIONS

Government: An agency, instrumentality, subdivision or other body of any national, state or local government, including regulatory agencies or government-controlled businesses, corporations, or companies.

Government Official: Government official includes:

- Any official or employee of a government, including any political party, administrative agency, or government-owned business;
- Any person acting in an official capacity on behalf of a government entity;
- Employees or agents of a business that is owned or controlled by the government;
- Any person or firm employed by, or acting for or on behalf of, the government;
- Any political party official, employee or agent of a political party, or candidate for political office (or political party position); and
- Any family member or other representative of any of the above.

Bribe: When one party gives or offers another party, either directly or indirectly, any reward, payment, promise, advantage or benefit of any kind, in order to influence a decision.

Improper Advantage: Improper advantage includes payments intended to wrongfully:

- Influence a decision by an official, including a failure to perform his or her official functions;
- Induce an official to use his or her influence to affect a decision by someone else in his or her Government; and
- Induce an official to use his or her influence to affect or influence any act or decision.

In addition to obtaining or retaining business, improper advantage includes reducing taxes or duties, looking the other way at minor code or rule violations, and any form of preferential treatment.

Knowledge: An employee is considered to have "knowledge" if the employee (i) is aware that a corrupt payment is being made, (ii) is aware that a corrupt payment is likely to occur, or (iii) has reason to know that a corrupt payment is likely to occur. Refusal to know, deliberate ignorance, conscious disregard, and willful blindness are treated as "knowledge" for purposes of this policy.

V. NON-COMPLIANCE

Violations of anti-corruption laws can cause criminal, civil and regulatory penalties including fines and/or jail, and even the perception of impropriety can damage the reputation of American Water and its employees. If an employee violates anti-corruption laws or this policy, it will result in disciplinary action, up to and including termination of employment.

VI. CONTACT INFORMATION; MONITORING

The Chief Compliance Officer is responsible for answering questions and the applicability of the Policy.

Appendix A – Summary of Policies & Practices Related to Anti-Corruption and Anti-Bribery Policy

Policy	Related Practice
Political Contribution Policy	
Code of Ethics	