

Policy for:

Anti-Bribery and Corruption

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and*
- (b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.*

Reference no. GD/CFO/PL/ETH/002

Document Owner: Emily Kelly

Published Date: August 2020

Effective Date: August 2020

Review period (from published date): 1 year

1 Why we have a Policy for Anti-Bribery and Corruption

1.1 *It is our policy to conduct all 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, including the Bribery Act 2010.*

2 Risk

2.1 *There is a risk that Cadent is accused of or perceived to be undertaking activities which are not compliant with the UK Bribery Act (2010). There is a further risk that we cannot demonstrate compliance with the Act, or our own internal policies, procedures and controls and there is a risk that Cadent may be subject to fraud. This could occur in a number of ways for example:*

- *perceived attempts to extract 'improper performance' from third parties and in particular government officials such as MPs and Ofgem.*
- *fraudulent activities by employees, customers, suppliers or other third parties such as diversion of cash from bank accounts, unauthorised instructions, theft*

2.2 *Even the accusation / perception of bribery by Cadent or those we are associated with us (e.g. suppliers), even if unfounded could lead to reputational damage, investigation and increased scrutiny / regulatory oversight. If proven there could also be significant financial penalties. If we are subject to fraud we may suffer financial loss. Consequential impacts could also include non-compliance with related legislation e.g. Criminal Finances Act (which makes facilitation of tax evasion by Cadent or an associate a corporate criminal offence).*

3 Implementation plan

3.1 *The Anti-Bribery and Corruption policy will be implemented following its approval from the Policy Committee. The policy will be uploaded to the Depot plus all relevant internal SharePoint sites and communicated to the business via Cadent's communications channels. This policy has not materially changed therefore, all training will still be appropriate.*

4 Scope

4.1 *This policy applies to all persons working for us or any Group Company 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.*

4.2 *In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.*

5 Definitions

5.1 **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.*

5.2 **Corruption** *is the abuse of entrusted power or position for private gain.*

6 Principles

The principles of this policy are:

- a) *setting out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption.*
- b) *provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.*

- c) *Provide formal reporting channels if you believe or suspect that any bribery, corruption or other breach of this policy has occurred.*
- d) *We will treat all concerns seriously and, to the fullest extent possible treat all concerns confidentially.*

7 Related Documents

7.1 *Please refer to the HR SharePoint site or my people services team for all related HR policies and procedures including; grievance policies and procedures, discrimination, harassment and bullying policies and Employee Code of Conduct.*

7.2 *Please refer to the Ethics SharePoint site or a member of the Ethics team for all related ethics policies and procedures including; 'Speaking Up' policy, 'Speaking up' standard and Always Doing the Right Thing.*

Need help?

Contact the **Ethics Team** or the **Internal Business Conduct Helpline**:

T: 0800 376 0113

E: businessconduct@cadentgas.com

External Business Conduct Helpline:

T: 0800 988 9094

E: report@seehearspeakup.co.uk

Contact **HR team** via **People Services**:

E: Mypeopleservices@cadentgas.com

T: 02476 052700 (Option 1)

Document History

Version	Changes	Author	Approved by	Approved on
V0.1	New format	Emily Kelly	BPAC	05/08/2020

Note on version numbers: V0.x = draft before approval, V1.0 = first approved version, v1.x= minor amendments, V2.0 = major changes

Application

Users should ensure they are in receipt of the current version by referring to the Policy Library on the Cadent Infonet site.

Compliance with this Policy does not confer immunity from breach of statutory or other legal obligations.

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Mandatory and Non-Mandatory requirements

In this document:

Shall: indicates a mandatory requirement

Should: indicates best practice and is the preferred option. If an alternative method is used then a suitable and sufficient risk assessment shall be completed to show that the alternative method delivers the same, or better, level of protection

Comments & Queries

Any comments or queries about the content of this document should be directed to:

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