

# *Modern Slavery*

## **Statement 2024/25**

**July 2025**



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# Introduction

## Message from the Chief Executive Officer



**As the largest energy distribution company in the UK, we sit at the heart of the energy system and recognise our responsibility to uphold the highest standards of integrity and transparency and to protect human rights in every part of our business and supply chain.**

We are committed to identifying and eliminating all forms of modern slavery. Through rigorous due diligence, strong partnerships and continuous education, we empower our teams and suppliers to operate with the highest ethical standards.

Our modern slavery statement reaffirms our commitment to preventing modern slavery and human trafficking and outlines the measures and actions we have taken this year to continually improve our approach in identifying and preventing modern slavery risks across our operations and crucially, within our supply chain. Our approach involves the following key elements:

- 1. Policy Commitment:** we have a comprehensive modern slavery statement that articulates our zero-tolerance approach to modern slavery and human trafficking.
- 2. Supply chain due diligence:** we conduct comprehensive due diligence on our supply chain to identify and address potential risks of modern slavery and human trafficking.
- 3. Supplier Engagement:** we engage with our suppliers to raise awareness of modern slavery risks and ensure adherence with our ethical standards.
- 4. Employee Training:** we provide training and awareness programs to educate our employees about this important matter.
- 5. Reporting Mechanism:** we maintain robust reporting mechanisms, including confidential helplines and channels, for reporting concerns.
- 6. Collaboration and advocacy:** we are supported in our commitment to be at the forefront of identifying and preventing modern slavery through key partnerships with organisations such as Slave-Free Alliance, Supply Chain Sustainability School and Utilities Against Slavery.

**Steve Fraser**

Chief Executive Officer



## About us

We are the largest gas distribution company in the UK and bring gas to 11 million homes and businesses throughout the North West, West Midlands, East Midlands, East of England and North London. We also manage the National Gas Emergency Service on behalf of the gas industry.

## Where we operate

### North West

**2.7m**

homes and businesses

**1,567**

colleagues

### West Midlands

**1.9m**

homes and businesses

**1,054**

colleagues

### Eastern; East Midlands and East of England

**4m**

homes and businesses

**2,216**

colleagues

### North London

**2.2m**

homes and businesses

**1,524**

colleagues





# Our purpose

Keeping people warm, *while protecting the planet*

## Our values

Our values guide every decision and action we take to ensure integrity, safety and sustainability in all aspects of our work.



**We work**  
*together*



**We take**  
*responsibility*



**We drive**  
*performance*



**We shape**  
*the future*

## Our ambitions

Our ambition is to be a force for good, providing an essential public service that ensures the safety, warmth and connectivity for communities across the UK.

*Fuel a thriving world*

**Easier**

*warmth*

**Fairer**

*opportunities*

**Greener**

*society*

## Sustainability strategy

Our Sustainability strategy is developed around the key commitments we made in our RIIO-2 business plan, delivering our safety commitment, providing a resilient network, tackling climate change, improving the environment, delivering a quality experience to all our customers and stakeholders, and being trusted to act for our communities. Our 'Force for Good' framework focuses on three key pillars: Easier Warmth, Fairer Opportunities and Greener Society.

## Our social impact

Our 'social Impact' describes our overarching social and sustainability ambitions. Our commitments capture the work we do to support customers in vulnerable situations, protect the environment, reduce our carbon footprint, promote diversity and inclusion, and support our local communities.

## Our people

### Equity, diversity, and inclusion

#### Our employee communities

We pride ourselves on being a fair, respectful and inclusive workplace where everyone can thrive. Our well-established communities cover a range of protected characteristics along with wellbeing and mental health.



Women in  
Cadent



Embrace



Cadent  
Military



Pride at  
work



Thrive



Grief Awareness



Men's Engagement  
Network

Our employee-run communities help us to engage, create an inclusive culture of learning and act as a critical friend. This year, we saw one of our newest communities, Grief Awareness, awarded as the winners of the 'Inclusion Award' at the Culture Pioneer awards for grief support and awareness trailblazers. They launched a podcast series with the National Bereavement Service, featuring real stories from our colleagues.

In partnership with our EDI community groups, we remain focused on leadership development, launching Anti-Racism e-learning, and introducing a Trans Equity Standard. We significantly enhanced family provisions by updating policies and increasing maternity/adoption provision to 12 months full pay.

At our annual EDI Conference, 'The Big Meet', we recognised outstanding achievements in inclusion, with 120 nominations across seven categories.

#### April 2025



**6,361** employees.



**40** is the average age of our employees.



**22%** of our workforce are female.



**12%** of our workforce are from BME backgrounds.

## Our people

**This year, we also celebrated a number of milestones and recognitions:**

- Partnered with Investing in Ethnicities, and sponsored the Outstanding Employer category at the Ethnicity Awards, affirming our dedication to being an anti-racist organisation.
- Collaborated with the Business Disability Forum to build on our culture that has been recognised via becoming a Disability Confident Leader in 2024.
- Named double winners at the Energy and Utility Skills 2024 awards for Employer of the Year and Attraction, Recruitment Campaign or Initiative of the Year Award, for our efforts in increasing diversity and fostering an inclusive and supportive workplace.
- Achieved Silver on the Stonewall Workplace Equality Index.
- Achieved the Royal National Institute for Blind People: Visibly Better Employer.

**Centred activities around culture being owned by our leaders through partnering and engagement, including:**

- Launching culture engagement videos to enhance belonging around our values.
- Leading Black History Month Gas Distribution Network collaboration and Armed Forces Day Event.
- Hosting safe space sessions during the Southport riots.
- Launching the award-winning Women in Operations 'shattering stereotypes' campaign.

## Recruiting, developing, and rewarding our people

**Our operating model ensures that decision making and accountability are close to our customers, and we ensure that we continue to deliver for our diverse range of customers and communities. As a responsible business, we pride ourselves on treating all employees fairly. Across our employee lifecycle, we ensure that employees are provided with equality of opportunity and a safe, secure and respectful environment.**

Our recruitment process is designed to ensure equal opportunities are available to all aspiring applicants and reflect our core values. We are proud that we go beyond legal requirements and pay all our employees the Real Living Wage. We diligently ensure adherence to our recruitment and onboarding policies and processes, thereby minimising the risk of forced or trafficked labour being employed directly by us or through our employment agencies.

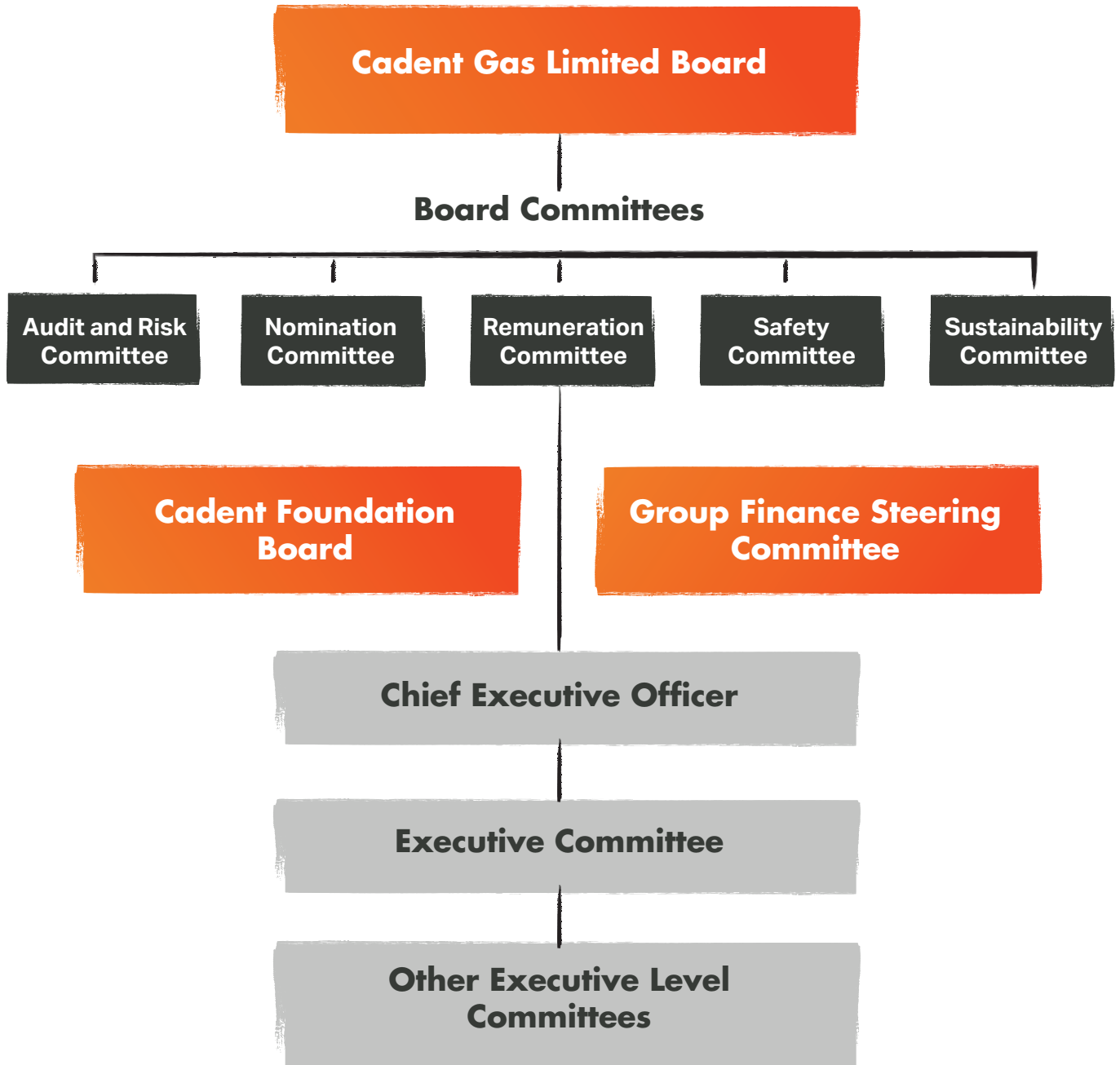
## Our people *(continued)*

**This year, we have launched several initiatives:**

- **Anonymised Hiring Process pilot:** We have eliminated CV submissions to remove bias, focusing on candidates' responses to motivational questions. Hiring managers did not see any candidate personal details before the offer stage.
- **Gamified Assessments with a Social Mobility Focus:** We introduced online gamified assessments to create an engaging and fair initial evaluation, which provided insights into candidates' problem-solving abilities and alignment with our core values.
- **Targeted Outreach and Community Engagement:** We expanded our outreach efforts to include career fairs, partnerships with community organisations, and collaborations with educational establishments to attract a diverse pool of applicants.
- **Inclusive Candidate Experience:** We maintained accessible communication throughout the recruitment process, ensuring all candidates felt valued and informed.

## Governance and policies

Our governance structure is set out below:



Our Executive Committee is responsible for identifying, assessing and managing the risks associated with modern slavery. Our Audit and Risk Committee assesses our approach to modern slavery and oversees progress against targets and objectives set by our Board, driving our future strategy.

## Governance and policies

We are committed to eradicating modern slavery in all its forms. Our policy and procedures for addressing modern slavery reflect this unwavering commitment and are designed to ensure that every aspect of our operations uphold the highest standards of ethical conduct.

The Board recognises the importance of maintaining and exemplifying high standards of business conduct to sustain public trust. Ensuring that the company consistently upholds these standards remains a priority. Through the oversight of the Audit and Risk Committee, the Board gains assurance that the company's ethical code of conduct, 'Always Doing the Right Thing', is understood and embraced and that the leadership team promotes a culture of 'speaking up'.

### Our policies relevant to modern slavery

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**Always Doing the Right Thing  
(our ethical code of conduct)**

'Always Doing the Right Thing' is our ethical code of conduct, which sets out how we expect all our employees and contractors to work. It includes specific guidance relating to modern slavery identification and reporting, highlighting the need to speak up if there are concerns that something is not right.

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**Equity, Diversity, and  
Inclusion**

Our EDI policy recognises and respects the importance and value of a diverse and inclusive workforce.

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**Supplier Code of Conduct**

Our supplier code of conduct sets out our expectations of how our suppliers, and their supply chain partners act when providing us with goods or services, ensuring that their business practises align with our values and aspirations. We expect all our suppliers, and their supply chain partners to act in accordance with our ethical standards, including those in relation to modern slavery, and to comply with all relevant laws, regulations and licences.

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**Procurement**

Our procurement policy ensures that our code of conduct and standards on ethical procurement are maintained, as well as ensuring compliance with relevant legislation and regulatory standards.

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**Counter-Fraud, Bribery and  
Corruption Policy**

Our Counter-Fraud, Bribery and Corruption policy sets out our zero-tolerance approach to fraud, bribery and corruption and our commitment to acting professionally, fairly and with integrity in all our business dealings and relationships.

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**Disciplinary**

Our disciplinary process ensures that all employees know what is expected of them, the fair process we have in place and the consequences of misconduct.

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# Governance and policies *(continued)*

<b>Speaking Up (whistleblowing)</b>	Our speaking up policy sets out our expectation that everyone will speak up about any concerns they have about actions that may not comply with our high ethical standards, including speaking up about concerns relating to slavery and human trafficking. We have internal and external reporting telephone lines, with the option to remain anonymous, as well as an email address for written reporting.
<b>Recruitment</b>	Our employment policies and processes make sure that all direct employees have the appropriate right to work and are employed in accordance with relevant legislation. Those who are contracted to work on our behalf are required to adopt a similar position in respect of those they engage, and this requirement is cited in the terms of our supplier contracts.

## Speaking up

We are committed to addressing Modern Slavery issues and encourage a culture of 'speaking up'. We provide channels for all employees, those working on our behalf, and the wider population, to raise concerns. We not only have confidential helplines available both internally and externally, operating 24 hours a day but also a dedicated internal inbox for all Ethics and Business Conduct queries. Details are available on our website, in our ethical code of conduct, Supplier Code of Conduct, on our intranet and on noticeboards in our offices and depots. We regularly communicate and increase awareness of all things ethics and business conduct which includes all our whistleblowing routes.

We take all allegations of potential ethical misconduct very seriously. We have an Ethics and Business Conduct Manager supported by a network of Ethic Champions across all functions of the business. The Ethics and Business Conduct Manager is trained to deal with all reported concerns, ensuring they are dealt with sensitivity, confidentiality, and impartiality. Business Conduct works to address any violations of company policies/ethical standards and implement any corrective actions to prevent recurrence.

Our Board and the Audit and Risk Committee are committed to supporting and promoting a positive 'tone from the top,' particularly with regards to 'speaking up'. To ensure transparency, the Board through the Audit and Risk Committee receive regular reports in relation to ethics and business conduct which provide detail on learnings, insights, as well as the proactive steps taken relevant to these and our ongoing commitments.

## Governance and policies *(continued)*

### Ethical code of conduct

At the core of our commitment to ethical business is our code of conduct, 'Always Doing the Right Thing.' This is a clear reflection of our values and our dedication to integrity, honesty and ethical behaviour.

Our code of conduct is more than a booklet - it's a framework that every employee, contractor and stakeholder need to comply with. It sets the standard for responsible action and raises awareness of the risks of modern slavery and human trafficking. It reinforces our zero-tolerance approach and our determination to prevent exploitation in any form, across our operations and supply chain. We actively embed these ethical standards into our culture. Through clear communication and mandatory company-wide e-learning training, we ensure every one of our team understands their role in upholding our values.



## Training and collaboration

**Tackling Modern Slavery requires collective action. We believe that meaningful change comes from working together – across industries and sectors. Through these partnerships, we collaborate with like-minded organisations, to share best practice, resources and insights aimed at preventing exploitation and combatting modern slavery. Our continued collaboration with the Supply Chain Sustainability School, Utilities Against Slavery, Slave Free Alliance and Hope for Justice is supported by the Board.**

### Supply Chain Sustainability School (SCSS)

We continue to work in partnership with the SCSS.

As a SCSS partner, we continue to benefit from various workshops, masterclasses, resources and training materials, which we provide to our supply chain professionals and contract managers to raise awareness of the risks of slavery and human trafficking. We co-chair a SCSS Working Group on Skills and Learning to share knowledge of sustainability, including measures to prevent modern slavery, with others in the utilities sector.

Our procurement professionals promote SCSS training to suppliers and contractors. Our Supplier Code of Conduct expects suppliers to join the SCSS and utilise its resources which is reinforced by our Procurement Standard. We monitor and report on the progress and uptake of SCSS resources by our suppliers and contractors, aiming for continuous improvement. In 2024/25, 85% of our suppliers, measured by spend value, utilised SCSS resources.

We continue to collaborate with the SCSS to develop targeted training for procurement professionals, enhancing awareness of modern slavery indicators and risks. As a responsible business, we support our employees and suppliers in recognising and reporting any concerns.

As a key partner of the School we have maintained our Gold Level Membership, reflecting our Supply Chain Sustainability maturity and level of engagement with the School. We make use of the sector-relevant platform to assist to manage, drive and develop a sustainable supply chain - addressing all aspects of Environmental, Social and Governance sustainability, including modern slavery.



## Training and collaboration

### Utilities Against Slavery (UAS)

UAS is a forum for electricity, water and gas providers to collaborate on addressing modern slavery and labour exploitation. We maintain our membership with UAS, a sector led working group aimed at sharing best practice, resources to prevent modern slavery.

Last year we were delighted to host the first strategy day for UAS in our Ansty office. This was hosted and organised by Cadent and UAS facilitators. The event brought together our peers from the UK utilities industry. Through a series of workshops and incident scenario exercises, the strategy day enabled us to:

1. Jointly address the exploitation of workers in our supply chains and in the broader community.
2. Share knowledge, expertise, and best practice to the benefit of all members.
3. Collaborate in producing a coordinated, consistent sector response to the risks of modern slavery.



### Slave Free Alliance and Hope for Justice

We are also proud supporters of Slave Free Alliance and Hope for Justice. We ensure learnings and resources from these globally recognised institutions are embedded in all we do.

### Continuing to raise awareness

In addition to the above, we continue to raise awareness of modern slavery through our key internal channels. This includes publications through intranet articles, our ethics champion network and e-learning. During Anti-Slavery Week 2024, we promoted awareness through team meetings and internal articles accessible to everyone across the organisation.

## **Our supply chain**

We work with around 1,800 suppliers and spend approximately £1.2bn with them annually. We remain committed to promoting equal opportunities to all our employees and suppliers. The standards we expect are mandated into our contracts through our Supplier Code of Conduct. This relates to working conditions, pay and workers' rights for those working in our supply chain. We require a positive response from suppliers that they agree with and accept our Supplier Code of Conduct.

### **Due diligence processes in relation to modern slavery and human trafficking**

All new suppliers that are onboarded on our Ariba Source to Pay system are asked to sign up to the Supplier Code of Conduct, regardless of whether they are a one-time vendor, or we plan a longer-term relationship.

For business requirements involving a formal tender process, a risk assessment is undertaken prior to commencing that process. Based on the outcome of the risk assessment, proportional due diligence is undertaken as part of the pre-qualification stage.

Subject to a successful tender outcome, the contracted supplier will be subject to contract management activities and supplier audits, which are managed on a risk-based approach.

### **Slave Free Alliance**

We are a key member of the Utilities Against Slavery Working Group, which collaborates with the Slave Free Alliance. This supports our regular review of our procurement processes to keep them in line with best practice in the Utilities Sector.

# Risk assessment and management

## Modern slavery risk assessment

Modern slavery within our business and within our supply chain is identified within our risk management system, which is supported by a control framework which mitigates against risks identified in this area. All risks and controls are reviewed and assessed on a regular basis in line with our risk procedure.

We work closely with our key suppliers to support their internal risk assessments in respect of modern slavery, including our Contract Management Organisations (CMOs) who support our mains replacement activity.

## Monitoring of suppliers

Our risk assessment of suppliers is ongoing after they are onboarded, supporting by a monitoring process which provides us with up-to-date information about our suppliers and the wider market. These monitoring activities include:

- Monitoring of suppliers' financials by Dun & Bradstreet.
- Independent verification audits through the Achilles platform (UVDB) or through Constructionline PAS91 construction standard. Our internal audit team also carry out targeted independent audits.
- Regular reviewing of the Dow Jones risk database to alert us to any specific issues within our supply chain that have not been identified through general contract management.
- Media and ARIBA alerts to highlight any potential issues with modern slavery practices in our supply chain. ARIBA is our end-to-end Enterprise Resourcing Plan system, which covers all aspects of procurement.

## Measure of effectiveness

We continually review the measures we have in place to check our progress and ensure our programmes are effective at identifying compliance with the Modern Slavery Act. This helps us to assess our performance and continuously improve.

Reporting of potential risks/concerns – To date, no instances have been raised to our Ethics and Business Conduct Team or to our Procurement Team, who work closely with our suppliers.

Supplier due diligence and adherence – The greatest risk of the occurrence of modern slavery lies within our supply chain. 90% of suppliers (by relevant spend value) have confirmed adherence to the Supplier Code of Conduct.

Training and awareness – All employees are mandated to complete their 'Always Doing the Right Thing' training which reference our Modern Slavery Statement. More than 94% of employees had completed this training by the end of the 2024/25 financial year.



## Looking ahead

### Performance and commitment

We are dedicated to continuously reviewing and improving our processes to ensure we operate without enforced labour, human trafficking, and slavery. Additionally, we provide guidance and training to our employees to reinforce our ethical code of conduct. We are fully committed to work on the following focus areas during 2025/26.

#### Achievements in 2024/25

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We have enhanced awareness of modern slavery across the organisation through targeted communications, including informative publications and strengthened relevant training to identify signs of Modern Slavery.

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All relevant policies are up to date.

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We maintained our quarterly monitoring of supplier engagement with SCSS training and resources.

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We have actively participated and shared best practice in workshops managed by Utilities Against Slavery.

#### Focus areas for 2025/26

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We will continue to provide our colleagues across the business with the relevant knowledge and support to identify and address modern slavery. We have commenced work to develop training for our First Call Operatives to help identify signs of Modern Slavery and look to launch this training over the next year.

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We will continue to use our co-chair position in the Utilities Against Slavery forum to learn and implement best practices.

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We have started and will continue to develop our supply chain 'risk mapping' to identify areas most susceptible to Modern Slavery and keep the map updated to reflect changes in our procurement approach.

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We will maintain ongoing oversight of suppliers to ensure they adhere to our Modern Slavery Statement requirements as part of our audit procedures.

## Contact us

To find out more or to give us feedback on our statement, contact us at [businessconduct@cadentgas.com](mailto:businessconduct@cadentgas.com)

Statement on the prevention of slavery and human trafficking for the **Cadent Gas Group**. The **Cadent Gas Group** consists of the following companies:

Quadgas Holdings TopCo Limited  
Quadgas Investments BidCo Limited  
Quadgas HoldCo Limited  
Quadgas PledgeCo Limited  
Quadgas MidCo Limited  
Cadent Services Limited  
Cadent Finance plc  
Quadgas Finance plc  
Cadent Gas Limited  
Cadent Gas Pension Trustee Limited  
Cadent Gas Pension Property 1 Limited  
Cadent Gas Pension Property 2 Limited



**Steve Fraser**

Chief Executive Officer  
Cadent Gas Limited  
Date: 24/07/2025



**Mark Braithwaite**

Director  
Quadgas Holdings Topco Limited  
Date: 24/07/2025

This statement is made according to the requirements of section 54 part 6 of the Modern Slavery Act 2015, legislation introduced to address slavery and human trafficking in the UK. Quadgas Holdings Topco Limited is the parent company of the Group and has approved this statement on behalf of the Group. This statement applies to all companies within the Group which are required to publish a statement.