

Policy for:

Counter-Fraud, 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 fraud, bribery and corruption, which includes conflicts of interest and gifts and hospitality; and*
- (b) provide information and guidance to those working for us on how to recognise and deal with fraud, bribery, and corruption issues, including conflicts of interest and gifts and hospitality.*

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Document Owner: Poonam Lakhani

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1 Why we have a Policy for Counter Fraud, Bribery and Corruption?

Cadent are committed to undertake business fairly, with integrity and transparency.

We take a zero-tolerance approach to fraud, bribery, and corruption by our colleagues and those who act on our behalf. We are committed to implementing and enforcing effective systems to counter fraud, bribery, and corruption. Through this standard, we aim to deter, detect, and investigate all forms of fraud, bribery and corruption and ensure that decisions being made within and on behalf of Cadent are objective, unbiased and in the best interests of the company. It is our standard to conduct all our business in an honest and ethical manner.

It is Cadent's policy to uphold all laws relevant to countering fraud, bribery and corruption, including the Bribery Act 2010 and the Fraud Act 2006.

The purpose of this standard is to:

- set out the overarching principles we expect our employees, and those working on our behalf, to comply with as regards bribery, corruption and conflicts of interest; and
- provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues.

2 Risk

This Policy mitigates against Cadent's principal risk associated with legal and regulatory compliance, for which Cadent's risk appetite is "averse".

There are various risks which this policy, and the supporting management standards, work to mitigate, including:

- Cadent is accused of or perceived to be undertaking activities which are not compliance with the UK Bribery Act (2010).
- Cadent cannot demonstrate compliance with the relevant legislation, or our own internal policies, procedures and controls.
- Cadent may be subject to fraud.
- Decisions may be taken within and/or on behalf of Cadent that are not objective, unbiased or in the company's best interest.

A breach of this Policy could result in a number of serious consequences for Cadent and the individuals involved, including:

- Imprisonment;
- Unlimited fines;
- Lengthy investigations;
- Reputational damage;
- Financial loss;
- Disruption to business;
- Ongoing external scrutiny;
- Damage to morale within the business.

3 Scope

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.

Compliance with this policy is mandatory for all employees associated with Cadent and any breach of this Policy will be regarded as a serious matter by Cadent and may result in disciplinary action or dismissal.

4 Definitions

Fraud is a wrongful or criminal deception intended to result in financial or personal gains.

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.

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

Employees: all Cadent employees and contractors

Third party: means any individual or organisation you come into contact with during 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.

Conflict of Interest is when competing interests impair our ability to make objective, unbiased business decisions. It occurs when an individual's personal interests, relationships, or activities interfere, or appear to interfere, with your ability to make unbiased decisions on behalf of Cadent.

Gift: is an item given to someone, without the expectation of payment or anything in return. It can include any item of value provided to a third party or their employees or received from a third party by Cadent or our colleagues.

Hospitality: includes any business entertaining, such as travel, accommodation, meals, and invitations to events given to Cadent and its employees by third parties or given by Cadent to third parties.

5 Principles

Key principles and responsibilities:

- We have a zero-tolerance stance to fraud, bribery, and corruption in all its forms, not only for employees of Cadent but to all suppliers, contractors, and business partners.
- You must ensure that you read, understand, and comply with this policy.
- We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in fraud, bribery or corruption, or because of reporting in good faith, their suspicion that an actual or potential bribery, corruption, fraud, or offence has taken place or may take place in the future.
- The prevention, detection and reporting of bribery and other forms of corruption including gifts and hospitality and conflict of interest 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.
- You must notify your people manager or the Ethics and Business Conduct 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.
- Employees should not accept or offer gifts or hospitality unless it is for a legitimate business purpose and it falls within the approved limits and required approvals have been sought, as set out in the Counter Fraud, Bribery and Corruption standard.

- If any employee accepts or offers any G&H's these should be recorded on the G&H register, as set out in the Counter Fraud, Bribery and Corruption standard.
- All colleagues should declare all potential conflicts of interest.
- We must avoid conflicts of interest where our personal interests or activities affect (or could be seen to affect) our ability to perform our work or make unbiased decisions on behalf of Cadent.

6 Related Documents

Please refer to Cadent's Policies Page, Ethics Depot page or the Ethics and Business Conduct Manager for all related ethics policies and procedures including:

- Speaking Up policy
- Speaking up standard
- Counter-Fraud, Bribery and Corruption Standard
- Conflict of Interest Standard
- Always Doing the Right Thing

Please refer to the My People Hub 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.

Need help?

Contact **Ethics & Business Conduct** 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 **My People Services** via **My People Hub**:

E: Mypeopleservices@cadentgas.com

T: 02476 052700 (Option 1)

Document History

Version	Changes	Author	Approved by	Approved on
V1.0	New format	Emily Kelly	BPAC	August 2020
V1.1	Company address	Emily Kelly	BPAC	December 2021
V2	Definition of fraud	James Partington	BPAC	April 2023
V3	Structural changes	Poonam Lakhani	BPAC	April 2024
V4	Minor changes to reflect the policy incorporates gifts and hospitality and conflicts of interest. Review period updated	Poonam Lakhani	BPAC	October 2024

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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