

Policy for: *'Speaking Up'*

As part of our culture of Always Doing the Right Thing, we encourage and support individuals to 'Speak Up' about any ethical concerns or suspected wrongdoing. Under this 'Speaking Up' policy individuals can report their concerns through formal channels in the knowledge that they will be dealt with seriously and, where possible, confidentially and with the protection afforded to "whistle-blowers".

Reference no. GD/CFO/PL/BC/001

Document Owner: Head of Audit and Risk, Brett Stevenson

Published Date: August 2020

Effective Date: August 2020

Review period (from published date): 1 year(s)

1 Why we have a Policy for ‘Speaking Up’

The purpose of this policy is to encourage individuals that observe or suspect unethical conduct or wrongdoing that might impact Cadent, to ‘Speak Up’ in confidence knowing they will be supported. It also describes what individuals should expect if you Speak Up. Cadent is committed to conducting business with honesty, fairness and integrity, and we expect all those working for and on behalf of Cadent to maintain these high standards in accordance with our Ethical Code of Conduct, [Always Doing the Right Thing](#) and our [Supplier Code of Conduct](#).

2 Risk

All organisations face the risk of things going wrong from time to time, and individuals or groups of individuals acting in an unethical manner. Without the right culture of honesty, openness and accountability, Cadent is at greater risk of being either accused or perceived to be undertaking activities which could be illegal and/or unethical. Equally, there is a risk that without the suitable resource, skills and reporting procedures, serious concerns are not appropriately investigated, despite having been formally reported by individuals speaking up.

Our Board always have a minimalist appetite for compliance risk and expect employees and those working for us to behave ethically and uphold the law. Unethical and/or illegal conduct by Cadent or those working for us or on our behalf (e.g. suppliers) could result in reputation damage, regulatory action and significant financial penalties. Even the perception of unethical or illegal conduct could result in reputational damage and lengthy regulatory investigations.

3 Implementation plan

The ‘Speak Up’ policy will be implemented following its approval from the Audit and Risk 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 from the existing “Whistleblowing policy”; therefore, all training will still be appropriate. The rebranding from the terminology of “Whistleblowing” to “Speaking Up” is designed to be more encouraging and accessible for all. Links to the updated policy and all references to “Whistleblowing policy” will be amended, including those within the Supplier Code of Conduct and the induction process.

4 Scope

This policy applies to all employees of Cadent, employees of contractors working for Cadent (i.e. Agency staff), contractors and suppliers. It also applies to how we support third parties who want to raise a concern.

This policy applies in relation to raising concerns about suspected unethical conduct or wrongdoing that amounts to: any violation of the law; a breach of our Ethical Code of Conduct, [Always Doing the Right Thing](#) and/or the policies which we operate.

Examples of concerns that can be raised using this policy are:

- (a) criminal activity;
- (b) failure to comply with any legal or professional obligation or regulatory requirements;
- (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) damage to the environment;
- (f) bribery and/or corruption;
- (g) financial fraud or mismanagement of funds;
- (h) breach of our internal policies and procedures, including our Code of Employee Conduct;
- (I) conduct likely to damage our reputation or financial wellbeing;
- (j) unauthorised disclosure of confidential information;
- (k) the deliberate concealment of any of the above matters.

The company is committed to compliance with all relevant legislation, including the Public Interest Disclosure Act 1998, which can provide protection for individuals who make 'qualifying disclosures' in the public interest.

This policy is not a mechanism for resolving complaints relating to matters of personal interest that affect you or your individual employment contract. These concerns should be raised under the company's grievance policies as appropriate, which are owned by the Human Resources team.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the [Ethics Team](#).

5 Definitions

'**Speaking Up**' is the disclosure of information which relates to suspected unethical conduct or suspected wrongdoing related to Cadent

A **whistle-blower** is an individual who raises a genuinely held belief in relation to suspected unethical conduct or wrongdoing.

6 Principles

The principles of this policy are:

- (a) Individuals to whom this policy applies are expected and encouraged to 'Speak Up' as soon as possible.
- (b) We will treat all concerns of unethical conduct or wrongdoing seriously and, to the fullest extent possible treat all concerns confidentially.
- (c) We will undertake an independent investigation where this is necessary.
- (d) All individuals who raise genuinely held beliefs in relation to suspected unethical conduct or wrongdoing will be supported to 'Speak Up' and will not be prejudiced for doing so.
- (e) Further detail and information can be found in the 'Speaking Up' standard (see section 7 – related documents)

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

7 Related Documents

Please refer to the HR SharePoint site or a member of the HR team for all related [HR policies and procedures](#) including; grievance policies and procedures, discrimination, harassment and bullying policies, drugs and alcohol policy and Employee Code of Conduct.

Please refer to the [SHES SharePoint](#) site or a member of the SHES team for all related SHE policies and procedures including; environmental policy and safeguarding policy.

Please refer to the Ethics SharePoint site or a member of the Ethics team for all related [ethics policies and procedures](#) including; 'Speaking Up' standard, Always Doing the Right Thing, Anti-Corruption and Bribery policy.

Document History

Version	Changes	Author	Approved by	Approved on
V0.1	Updated Template	Emily Kelly	BPAC	18/02/2020

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 Page on the Depot Intranet site.

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

Copyright © 2020 Cadent Gas Limited - All Rights Reserved.

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:

Cadent
Ashbrook Court
Central Boulevard
Prologis Park
Coventry
CV7 8PE