

# Modern Slavery Statement 2020/21

July 2021



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# Introduction

## Message from the Chief Executive Officer

**“Modern slavery is a serious global issue and Cadent recognise the important role we can play in tackling it. I am committed to supporting those who work directly for Cadent, and those who work on our behalf, in their working rights including, having the appropriate working conditions, being treated with respect and being paid fairly”.**

Our modern slavery statement sets out the steps that we have taken to prevent slavery and human trafficking from taking place in any part of our business or expect from our supply chain.

Our policy framework, training and awareness programmes incorporate the commitment we make towards the respect for human rights at every level in the business.

We have taken positive steps forward, improving our policies, processes and training so we can mitigate the possibility of exploitation within our supply chain.

This year, we have partnered with the Supply Chain Sustainability School who co-ordinate organisations in the Utilities Sector in combatting Modern Slavery. All our suppliers are strongly encouraged to join the School and take advantage of the numerous resources offered.

We continue to build on our relationships within the industry; keeping abreast of developments and highlighting emerging risk areas, all with the shared goal of preventing human trafficking and slavery whilst upholding core values of fairness, diversity and inclusivity.



**Steve Fraser**  
Chief Executive Officer



# Overview of our business and our values

## Keeping people warm, while protecting the planet.

As the UK's largest gas distribution network, it is our responsibility to look after the gas pipes so they can continue to deliver safe, reliable and low carbon energy for years to come. It's our job to fix leaks, make sure everything is running as it should and connect new homes and businesses to the network. As part of this work, we are replacing the old gas pipes that have been in the ground for decades, so that they last long into the future and continue to provide a safe, efficient, gas supply. We have international partners in our supply chain who provide goods and services to our business.

We provide extra care for those who might need it in a gas emergency. We manage the National Gas Emergency Service for all gas customers in the UK. If something goes wrong, we are the first point of call to make sure it's dealt with calmly, quickly and safely.

## Our networks

We look after over 131,000 kilometres of pipeline and almost 50% of Great Britain's gas customers are served by our pipelines. Each area has its own geographical and social requirements and we are committed to improving our levels of service with a localised customer operating model that can respond to the specific needs of the communities we serve.



## Our values and behaviours



### We work together

- I collaborate to deliver the best solutions
- I engage with others to identify root causes and generate better outcomes
- I embrace inclusivity and diversity
- I communicate clearly
- I treat everyone with respect



### We drive performance

- I strive for excellence
- I take ownership of everything I do
- I put the customer at the heart of everything I do
- I think things through before acting
- I move things forward at pace



### We take responsibility

- I stop and make things safe
- I speak up when things aren't right
- I consider the financial impact of my decisions
- I do the right thing
- I look after my own and support others' health and wellbeing



### We shape the future

- I challenge the status quo
- I welcome new ideas and different ways of thinking
- I embrace change and am open to learning and adapt
- I take action to make a difference
- I act in a sustainable way

# Our people

## Recruiting, developing and rewarding our people

The last 12 months has seen a transformation in the shape of the organisation, with an increase in our direct workforce from 4,391 to 6,163. Our operating model has also seen significant changes, taking decision making and accountability much closer to our customers to ensure we continue to deliver for our diverse range of customers and communities. We 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.

The way we recruit is designed to ensure equal opportunities are available to all aspiring applicants and that our process complies with legislation and our core values. We are proud that we go beyond legal requirements and pay all our employees the real Living Wage. We carefully monitor compliance to our recruitment policies and processes, meaning the risk of forced or trafficked labour being employed directly by us and our employment agency is very low.

We know that our industry is traditionally male dominated, but we are working to make positive change in this area. Our mean gender pay gap is currently 16.5%. This year we have increased the number of female employees by 3% and are proud that 39% of our non-statutory directors that sit beneath the executive and are the next level of senior directors are female.

### Our Employee Communities



#### Women in Cadent

Creating a network of colleagues from across our business, who are all committed to creating equality and supporting women's professional and personal development.



#### Embrace

Raising awareness of the different faiths, discuss issues that affect colleagues from an ethnic minority background, and to help develop a workforce that reflects the communities we serve.



#### Cadent Military Community

Actively supporting service leavers entering the business, our current reservists and those that have previously served. We are proud signatories to the Armed Forces Covenant, and it is important that we demonstrate that we are an Armed Forces friendly employer.



#### Pride at Work

Allowing current and future generations of LGBTQ+ colleagues to feel comfortable, safe and included at work. Our employee-led community, Pride at Work, is a welcoming and safe space where our Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ+) and allied members can thrive.



#### Thrive!

Raising awareness of and supporting disabilities in the workplace. Our community is made up of both disabled and non-disabled employees who share a common vision of focusing on ability and making our workplace accessible and supportive to all. We raise awareness on the spectrum of disabilities, what this means to our people and how we can support the business to become a leading employer for those with disabilities.

## Equality, diversity and inclusion

We work to promote diversity across the workforce, with many positive programmes in place to ensure we are attracting diverse talent, such as; family friendly policies, partnerships with specialised organisations (i.e. Social Mobility Foundation, Women's Engineering Society and Stonewall), diverse career fairs and more.

All our employees are supported by an internal health and wellbeing programme and have access to a confidential employee assistance helpline. Within the last 18 months, we have launched five employee-led Employee Communities which play an important role in promoting and championing inclusiveness and integrating a diverse workforce.

The communities have worked collaboratively to support each other on a variety of different initiatives; hosting 'lunch and learns', networking events, 'role model' series, celebrated National Inclusion Week, Black History Month, Pride Month, LGBTQ+ History Month, Race Equality Week, International Women's Day, International Men's Day and more.

### More information about diversity of our workforce

6,163

EMPLOYEES

39

YEARS IS THE AVERAGE AGE  
OF OUR EMPLOYEES

8%

OF OUR WORKFORCE ARE  
FROM BLACK, ASIAN AND  
MINORITY ETHNIC

21%

OF OUR WORKFORCE  
ARE FEMALE

# Promoting a ‘Speaking Up’ culture

## Speaking Up

We continually promote a culture of ‘speaking up’ which is supported by the numerous channels available to all employees, those working on our behalf and the wider population to raise concerns. We have confidential helplines available both internally and externally, operating 24/7. Details of these helplines 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 take all allegations of any type of potential ethical misconduct very seriously. We have a dedicated Ethics and Business Conduct team supported by a network of ethic champions across all functions of the business. The team is trained to deal with all reported concerns sensitively and thoroughly, by carrying out independent investigations and taking any relevant action. Our Executive Committee is committed to supporting and promoting a positive ‘tone from top’ particularly with regards to ‘speaking up’. They also receive regular reports in relation to ethics and business conduct and oversee the ethical standards of the company and monitor compliance to our policies, procedures and ethical code of conduct, ‘Always Doing the Right Thing’.

## Training and awareness

We make sure all our employees are aware of and trained in our ethical code of conduct, ‘Always Doing the Right Thing’. This ethical code of conduct applies to everyone working for us and on our behalf, setting out our values, behaviours and expectations. It raises awareness of the risk of slavery and human trafficking, and our commitment to preventing slavery and human trafficking in our business and supply chains.

As one of the Supply Chain Sustainability School partners, we benefit from workshops, masterclasses, resources and training materials, which we provide to our relevant supply chain professionals and contract managers to raise awareness of the risks of slavery and human trafficking in the supply chains.

All procurement and supply chain professionals will be promoting the use of the Sustainability School’s training to our suppliers and contractors. Progress and uptake of our suppliers and contractors using the School’s resources will be monitored and reported to identify any future improvements that will form the basis of driving inclusion in this critical resource. In 2021, we will be developing the training currently available to procurement and supply chain professionals within Cadent to raise further awareness and understanding of the signs of modern slavery. As a responsible business, we can help inform our employees and suppliers to have the knowledge to recognise and report any concerns that they may witness.



# Our policies

## Our policies and processes to prevent modern slavery and promote fairness, diversity and inclusivity

We know that setting clear expectations is very important. Our policies are summarised below, which collectively set the standards we require, encompassing the prevention of modern slavery in the workplace and in our supply chains. We regularly monitor compliance with our policies and report on how we're doing to both our Executive and Audit and Risk Committees.

### Our policies relevant to modern slavery

Policy	Relevance to modern slavery
Always Doing the Right Thing (our ethical code of conduct)	Our Ethical Code of Conduct outlines the values and guidance on all business interactions. It includes guidance relating to Modern Slavery identification and reporting.
Equality, Inclusion and Diversity	Recognises and respects the importance of an inclusive and diverse workforce. We are fully committed to complying with all relevant legislation, specifically that which is outlined in the Equality Act 2010.
Supplier Code of Conduct	Our expectations of how our suppliers, and their supply chain partners, act when providing us with goods or services, ensuring the way our suppliers do business aligns to our values and aspirations. We expect all our suppliers to act in accordance with the highest ethical standards, and to comply with all relevant laws, regulations and licences.
Procurement	Sets out the responsibilities of our employees, and those working on Cadent's behalf in purchasing third party spend. The principles set out in the policy aim to ensure that our code of conduct and standards on ethical procurement are maintained as well as ensuring compliance with relevant legislation and regulatory standards.
Anti-Bribery and Corruption	Sets out the responsibilities of our employees, and those working for us, in observing and holding our high ethical standards in relation to bribery and corruption. We take a zero-tolerance approach and are committed to acting professionally, fairly and with integrity in all our business dealing and relationships.
Speaking Up (whistleblowing)	We encourage reporting on slavery and human trafficking, as well as all other ethical matters through our specific 'Speaking Up' policy. This includes the provision of both an internal and external reporting telephone line, and email address available to anyone who wishes to raise a concern in complete confidence.
Recruitment	Our employment policies and processes make sure that all direct employees have the appropriate rights 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.
Disciplinary	All employees know what is expected of them and the consequences for misconduct.



# Our supply chains

We work with around 1,000 suppliers and spend in the region of £1bn with them annually. We are 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

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

As part of our tendering process, we use an industry wide external vendor qualification system, called the Utilities Vendor Database (UVDB). The UVDB includes questions on slavery and human trafficking as part of the registration process and answers are reviewed as part of our procurement and contract management processes. For certain high-risk categories, an external company perform on-site supplier audits on which they report.

We also use the due diligence services provided by Dow Jones for managing regulatory and reputational risks, especially for companies we have identified as a higher risk.

We are currently looking to improve our current onboarding process by requesting Modern Slavery Statements at pre-qualification question (PQQ) stage for high risk suppliers which include any labour contracts.

We reserve the right, as stated within standard contract terms, to terminate a supplier if they are found to be non-compliant with the standards as set out in the supplier code of conduct including modern slavery.

As we continue to evolve our approach to ensuring that our commitment to removing modern slavery is embraced by our supply chain, we are developing our supply chain assurance frameworks to include active assurance of compliance through supplier audits in both our procurement and contract management processes. These audits will look beyond the compliance statements and policies of those suppliers that are identified as high risk to ensure that the commitments made within these statements and policies are being enacted and driving positive outcomes.

We recognise the importance of having responsible and sustainable procurement processes in place and as part of our RIIO-2 regulatory plans for 2021–26, we are launching a Sustainable Procurement Standard that covers the management of Modern Slavery in our Supply Chain.

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We continue to collaborate across the industry and work with our suppliers to mitigate risks associated with modern slavery. We are members of a number of working groups that are designed to share best practice and drive change on a broader scale.

## Here are some highlights

### Supply Chain Sustainability School (SCSS)

We are one of the school's key partners and have been awarded Gold Level Membership in recognition of our Supply Chain Sustainability maturity. The School provides a sector-relevant platform for organisations to manage, drive and develop a sustainable supply chain by addressing all aspects of Environmental, Social and Economic sustainability including modern slavery.

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### Sustainability First's 'Fair for the Future' project

This has involved active participation in establishing the four pillars of a sustainable licence to operate. This work has featured heavily in our 'Trust Charter' and we continue to play an active role in the project.

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### Slave Free Alliance

We are a member of the Utilities Modern Slavery working group which collaborates with the Slave Free Alliance. As part of this working group, we are reviewing our procurement processes to keep them in line with best practice in the Utilities Sector; hence preventing enforced labour, human trafficking and slavery in a co-ordinated manner within our industry.

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# Risk assessment and management

## Modern slavery risk assessment

We have captured the risks associated with modern slavery within our company risk management system. This includes the risk of modern slavery in our supply chain. A control framework is in place detailing how we mitigate these risks from materialising.

We use our risk assessment process, designed to identify high risk suppliers and assess whether further controls or assurances need to be put in place.

### Identification of high-risk suppliers

We have brought many of our extended workforce in house, creating a more sustainable environment for our people and forging greater bonds between different areas of the business.

In terms of suppliers, all organisations providing labour would be considered as a risk area for modern slavery. However, we procure materials mainly from industries that do not use high-risk sources in this context. Therefore, we deem the risk of modern slavery in our supply chain as low.

We are reviewing our process for identifying potential high-risk suppliers, this includes our processes by which any potential new suppliers are assessed for compliance with modern slavery through impact assessments and new PQQ questions within our revised procurement process. We will be working closely with our new Contract Management Organisations (CMO) to support them through assessing their supply chains and identify where any potential risks may arise.

### Monitoring of suppliers

To inform our ongoing risk assessment we have a number of monitoring processes to provide use with the up to date position in respect of our suppliers and the wider market. These include:

- Monitoring of suppliers' financials by Dun and Bradstreet.
- Verify audits over our product suppliers registered with Achilles (UVDB). For certain key products, our internal team will carry out independent audits.
- Monitoring programme covering our suppliers using the Dow Jones risk database which we use alongside our ongoing contract management. This is designed



to alert us to any specific issues within our supply chain to enable us to take appropriate action. This will be expanded to companies in the broader industry to help us understand emerging risks that may require further mitigation.

- Monitor the media and other sources and receive alerts from ARIBA in respect of companies suggested to be engaging in modern slavery practices.

### Control Framework

Through our RIIIO-2 framework contracts any risks identified at the sourcing stage will be reviewed and managed through the contract management processes as part of range of health checks. In an instance where a supplier is either unwilling to or unable to provide the relevant evidence, this would result in a formal process to review the contract and influence the allocation of any future project work over the framework period.

### Impact of COVID-19 on the supply chain

During COVID-19, we have adapted our business to a more virtual environment, we have continued to complete supplier audits remotely and have asked questions regarding impacts to their supply chains. Suppliers have responded well to these changes within their supply chains

### Measure of effectiveness

To date, no modern slavery concerns have been raised to our Ethics and Business Conduct team. Procurement teams work closely with our suppliers and have identified no direct concerns.

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.

# Our ongoing commitment

## Looking ahead

We continue to review our processes to make sure we operate free from enforced labour, human trafficking and slavery. We also continue to provide regular guidance and training to our employees to embed our ethical code of conduct, 'Always Doing the Right Thing'.

We are fully committed to work on the following focus areas during 2021/22.

### Focus areas for 2021/22

1

Develop our supply chain assurance frameworks to include active assurance of compliance through supplier audits in both our procurement and contract management processes.

2

Further develop targeted training to relevant supply chain professionals, to increase awareness of the risks of slavery and human trafficking in the supply chains.

3

Identify and utilise scorecard metrics from the Supply Chain Sustainability School to monitor supplier engagement and capability on sustainability.

4

Embed a Sustainable Procurement Standard that covers the management of Modern Slavery in our Supply Chain

5

Share our recognised good practice and associated materials that relate to the well-being of employees, with our supply chains.

6

Utilise the Government Modern Slavery Register as an additional compliance measure.



## Governance

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

## 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 Services 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: 14 July 2021



Mark Braithwaite

Director

Quadgas Holdings Topco Limited

Date: 14 July 2021

*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.*