

# **Cadent** Modern Slavery Statement

July 2019





**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 and Cadent Gas Limited (together the "Group").**

This statement sets out the steps that the Group has taken to make sure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

Cadent Gas Ltd is a gas transporter based in the UK. We look after the pipes that bring gas to your home or business. It's our job to fix leaks, make sure everything is running as it should and connect new homes 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 you with a safe, efficient, gas supply. We have international supply chains which provide goods and services to our business.



# Our policies and processes to prevent slavery and human trafficking

We make sure all our employees are aware of and trained on our guide to ethical business conduct, which is called 'Always Doing the Right Thing'. This guide applies to everyone and sets out our values and the way we expect those working for us, and our behalf, to behave. 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.

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.

We encourage reporting on slavery and human trafficking, as well as all other ethical matters. As part of this, we have a specific whistleblowing policy. This policy includes the provision of both an internal and free external reporting telephone line, available to anyone who wishes to raise a concern in complete confidence.

To encourage and support these efforts, we have an internal Ethics and Business Conduct team. This year we have taken steps to enhance our ethics programme to ensure there are sufficient 'ethics champions' to support all areas of the business with local queries and concerns and have established regular ethics communications in our employee newsletter.





# Our processes for preventing slavery and human trafficking

As part of our initiatives to identify and reduce risk in our supply chains, we have the following control framework in place:

- **Pre-qualification of suppliers to our businesses:** 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.
- This is supplemented by our own risk assessment process, designed to identify high risk suppliers and assess whether further controls or assurances need to be put in place. No high risk suppliers have been identified. This is an ongoing process, which continues to monitor the risk in our supply chain.
- **Supplier Code of Conduct (SCoC):** In our Supplier Code of Conduct, we set out our requirements and expectation for those who work on our behalf, including compliance with the Modern Slavery Act 2015. We provide this code to all our suppliers and ensure they all commit to applying its principles. This SCoC is part of our standard contractual terms and conditions, and where possible it forms part of the contract with our suppliers. All of our contracts include provisions which require compliance with the law, including the Modern Slavery Act 2015
- **Supply Chain Monitoring:** We have a monitoring programme for our suppliers using the Dow Jones risk database. This, along with our on-going contract management will alert us to any specific issues within our own supply chain to be able 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.

## Our ongoing commitment to preventing slavery and human trafficking

We continue to review our processes to make sure we operate free from enforced labour, human trafficking and slavery, and provide regular guidance and training to our employees to embed our ethical code of conduct, 'Always Doing the Right Thing.' We also provide targeted training to relevant supply chain professionals, to raise awareness of the risks of slavery and human trafficking in the supply chains.



**Steve Hurrell**



**Interim Chief Executive Officer**

**Cadent Gas Limited**

**Date:**

*18 July*

**2019**

**Mark Braithwaite**



**Director**

**Quadgas Holdings Topco Limited**

**Date:**

*18 July*

**2019**

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.