

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 in the knowledge that reports will be dealt with seriously, fairly, confidentially and that those who speak up with a genuine belief will not suffer detriment as a result of doing so.

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Document Owner: Ethics and Business Conduct Manager

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Review period (from published date): 3 years

1 Why we have a Policy for 'Speaking Up'

Cadent is committed to conducting our 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](#).

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 they Speak Up.

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 maintain a low risk appetite for compliance risk and expects employees and those working for us to behave ethically and uphold the law at all times. 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 Scope

Who does this policy apply to?

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.

What is 'Speaking up'?

'Speaking Up' is the disclosure of information which relates to suspected wrongdoing or dangers at work. 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 under our Counter Fraud Bribery and Corruption policy/standard;
- g) facilitating tax evasion;
- h) financial fraud or mismanagement of funds;
- i) breach of our internal policies and procedures, including our Employee Code of Conduct;
- j) conduct likely to damage our reputation or financial wellbeing;
- k) unauthorised disclosure of confidential information;
- l) negligence
- m) sexual harassment
- n) the deliberate concealment of any of the above matters.

Cadent 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 a personal interest that affect you or your individual employment contract. These concerns should be raised under Cadent's [grievance policies](#) as appropriate, which sit within are owned by the My People Services Team.

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

4 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) Where appropriate, we will undertake an independent investigation all reports received .
- 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) Cadent will ensure, clear, accessible channels for reporting and will provide individuals with guidance on how to raise those concerns.

Further detail and information can be found in the 'Speaking Up' standard.

5 Related Documents

Please refer to Cadent's Policies Page, [Ethics SharePoint site](#) or Ethics and Business Conduct Manager for all related ethics policies and procedures including:

- Speaking up Policy
- Counter-Fraud, Bribery and Corruption Policy
- Counter-Fraud, Bribery and Corruption Standard
- [Always Doing the Right Thing](#)

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

6 Policy monitoring and compliance framework

Compliance with the 'Speaking Up' policy will be monitored by the Ethics and Business Conduct Team through oversight of speaking up activity. This includes ensuring that

‘speaking up’ channels remain accessible, clearly communicated and effective in enabling individuals to raise concerns safely and confidentially.

Additional assurance will be obtained through functional targeted assurance activities.

The Ethics and Business Conduct team also provides bi-annual reports to the Audit and Risk Committee.

Document History

Version	Changes	Author	Approved by	Approved on
V0.1	Updated Template	Emily Kelly	BPAC	18/02/2020
V1.0	Final Approved	Emily Kelly	Policy Committee	29 May 2020
V2.0	Updated Job Roles	Emily Kelly	Policy Committee	27 May 2021
V2.1	Removal of old office location	James Partington	BPAC	June 2022
V2.2	Minor grammar changes	James Partington	BPAC	June 2023
V3.0	The Policy has been updated to reflect updates in legislation, processes and organisational structure.	Poonam Lakhani	BPAC	09 June 2026

Note on version numbers: V0.x = draft before approval; V1.0 = first approved version; v1.x= updates during review process; V2.0 = next approved version

Application

Ensure you are in receipt of the current version of this document by referring to the Policies section on The Depot.

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