



Code of Ethics and Speak-Up Policy

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2. Welcome

A word from Jon Butterworth, Chief Executive Officer

We are here to lead a clean energy future for everyone and this purpose, together with our values and priorities, guides how we serve our customers and look after the communities we operate in.

In National Gas, we're also working hard to build a strong culture that's caring, purpose-led, and results-driven as we play our critical role in the energy transition and make sure no-one is left behind. Both our purpose and our culture are positive proof of our belief that we need to stand for something beyond profit. They also emphasise the importance of trust, which we earn not just by meeting our commitments, but by making sure we do so in the right way. How we work is as important as what we do.

Our Code of Ethics & Speak-Up Policy applies to everyone across the organisation. It's intended to help protect our reputation as an ethical business and so

maintain the trust of everyone we do business with. The choices and decisions we make every day really matter and we should all feel confident in voicing our opinions and in challenging behaviour which doesn't feel right.

The Code sets out the policies and guidelines we have to help us do the right thing. You will also find where to get further advice and the Speak-Up Policy explains how to raise a concern. Remember, if you see something that isn't right, you should speak up. No matter who is at fault, or the mistake that was made, we should all be prepared to learn from each other.

So, please take time to read and reflect on this Code and apply its principles to how you do things every day. You'll be protecting yourself, our business and our reputation for excellence.

Jon



3. Our Code of Ethics and Ethical Decision Making

- 3.1** This Code of Ethics (“the Code”) contains guidance sections that highlight key principles, ethical dilemmas and frequently asked questions (FAQs) to support our understanding, as well as details of what the guidance means to us.
- 3.2** Our Code is supported by robust processes for investigating concerns raised and responding to related queries. Please refer to the contact information at the back of the Code for details of how to report ethical concerns or for further guidance on questions or queries.
- 3.3** Failure to comply with the Code and any associated company policies and procedures is taken seriously and may result in disciplinary actions up to and including dismissal, in line with local disciplinary procedures.
- 3.4** Our Code also reinforces the importance of speaking up, so we can learn from our mistakes and address unethical behaviour. That means being open and honest and speaking up if we see something unsafe, unethical or potentially harmful. We do not tolerate victimisation or retaliation against anyone who raises a concern or provides information to an internal investigation, and consider such acts to be misconduct. Any such acts will be subject to disciplinary procedures

As a National Gas employee, consultant or contractor I will:

- ✓ comply with the laws, regulations and company requirements that apply to my job;
- ✓ follow the guidelines set out in this code and seek further information when required;
- ✓ not tolerate poor ethical standards in others and will speak up promptly about possible misconduct;
- ✓ treat employees and third parties with respect;
- ✓ cooperate fully with internal and external auditors, lawyers, HR, Ethics and any other people involved in investigations; and
- ✓ build trust and create an environment that makes it comfortable and safe for colleagues to speak up.

National Gas will:

- ✓ conduct our business in an ethical manner;
- ✓ promote an environment where everyone can do the right thing and feel comfortable raising any concerns about actions or decisions that they think are unethical;
- ✓ investigate the facts thoroughly and fairly where concerns are raised in good faith and ensure appropriate actions are taken; and
- ✓ not tolerate retaliation or victimisation of any kind and will take action against any employee who is found to have victimised someone for raising a concern or providing information to an internal investigation.

Ethical Decision Making

- 3.5** This Code sets out the ethical framework in which we operate. However, the Code is not exhaustive and will not cover all situations you may face at work. To help you do the right thing when making decisions at work, ask yourself the following questions:

- ✓ Is your approach in the best interests of National Gas?
- ✓ Is your approach legal, fair and honest, and does it comply with National Gas’s policies?
- ✓ Do you have any personal connection that someone else could perceive as a conflict of interest in this situation?
- ✓ Does the approach avoid creating a sense of obligation?

- 3.6** If in any doubt as to whether a proposed approach is ethical, please reach out to the Ethics team using the contact information at the back of the Code.



4. Acting Responsibly

Safety, Health & Wellbeing	
Introduction	Our activities and those of our contractors can involve risks. We must assess those risks and remove or minimise them by putting in place preventative and protective measures to keep ourselves, the people who work with us, the public, and our assets safe.
Principles	✓ We all take responsibility for achieving our safety ambition, to have a culture where we always do the right thing regarding safety, keeping everyone safe every day. ✓ We take ownership and consider the safety impacts in everything we do. ✓ Everyone understands what they need to do to keep themselves and others safe. ✓ We commit to openly discussing safety issues and constructively challenging unsafe behaviours. ✓ We report all incidents, near misses and good catches.
Dilemma	I've worked with the same team for a few years. Recently, one member has cut corners in following safety procedures. I feel that this has put him and the rest of the team at risk. Other team members have noticed it too, but they haven't told our manager. They say I shouldn't worry about this and that our colleague is just going through a tough time. I don't want an incident to happen, but I also don't want to distance myself from the other team members or get this employee into trouble. What should I do? It's good to be loyal to your team, but that loyalty should prompt you to take action. You should constructively challenge the unsafe behaviour and raise your concerns. This could be by having a safety conversation with the individual or discussing it collectively as a team in an appropriate forum/meeting. You should also report your concerns to your manager. There could be many reasons for your colleague's unsafe behaviour, but whatever the reason, it can't continue. Remember that cutting corners and not following safety procedures could lead to an incident and someone could get hurt. Raising concerns enables us to learn from our mistakes, implement improvements and keep ourselves and each other safe.
FAQs	Do I really have to report a minor accident if nobody had to take time off work? Yes. You must report all incidents, no matter how minor. We look at all incidents – however trivial they may seem – to identify any hazards and trends, so that action can be taken to prevent injuries from occurring.
What this guidance means to you	We strive to be best in class when it comes to safety. It's important that we always work safely and comply with health and safety rules and regulations. You should constructively challenge unsafe behaviours, and you must report all incidents and near misses, so we can investigate them and take appropriate action.
Policy Section Owner	Safety, Health and Wellbeing Management

Environmental Protection	
Introduction	As a responsible business we aim to go beyond legal compliance and seek opportunities to operate in a sustainable way by not only preventing negative environmental impacts, but by leaving the natural environment in an improved state as a result of our actions. We're all responsible for protecting and enhancing the environment.
Principles	✓ We identify and manage our environmental risks and opportunities, including addressing the climate emergency, and developing mitigation plans aligned to our Net Zero glidepath. ✓ We comply with all applicable environmental regulations and requirements, following our environmental procedures, and when required, we seek specialist advice to inform our decisions. ✓ We protect the environment by preventing pollution and implementing mitigation strategies throughout the lifecycle of our assets. ✓ We set ambitious environmental targets to address our most significant environmental aspects across our five pillars: Climate change, circular economy, nature, supply chain and stakeholder engagement. ✓ We assess and implement innovative techniques to lead the transition towards decarbonising our operations. ✓ We upskill our employees and supply chain with the necessary resources to drive behavioural change in environmental sustainability and to achieve our targets. ✓ We report all environmental incidents and near misses, however minor they may seem. We treat environmental incidents as we do safety incidents. ✓ We work with our stakeholders and our supply chain to influence and improve environmental stewardship and support the delivery of our targets.
Dilemma	During a recent site visit I found that on-site controls and monitoring records hadn't been inspected, which have to be done as part of our regulator and environmental permit commitments. What should I do? Tell your manager straight away. You may also need to contact your regional Environmental team, the central Environmental & Sustainability team or the Legal department to inform them of the matter. They'll discuss it with you and give advice. ----- When reviewing reports, I routinely print out paper copies. What should I do? Consider whether it is necessary to print the reports instead of reviewing the reports on your computer.
FAQs	Do I still have to report an environmental incident if no pollution was caused? Yes. You must report all environmental incidents, no matter how minor. We investigate all incidents that are reported – however trivial they may seem – to identify hazards, capture any learning and prevent it from happening again.

What this guidance means to you	This guidance helps you understand how environmental policies, procedures and processes apply to your job. Remember that to meet our environmental commitments we must all support the environmental sustainability policy in all areas of our work.
Policy Section Owner	Environment & Sustainability Manager, Engineering & Asset Management



Insider Threats	
Introduction	If an employee or contractor misuses National Gas information or access to harm our company, this is referred to as an 'Insider Act'. Insider acts can include criminal activities such as theft, fraud, sabotage, terrorism and commercial or state-sponsored espionage. A person from outside National Gas could also pose a threat by exploiting a relationship they have with one of our employees or contractors.
Principles	✓ We ensure that, prior to their start date, background checks for all new employees and contractors are completed to ensure they do not pose an unacceptable risk. ✓ as part of National Gas's Insider Threat framework, all roles are subject to security role risk assessment. Where a role presents elevated opportunity, access, or impact risk, National Security Vetting is mandated as a preventative control to mitigate insider threat. This is a higher level of vetting to pre-employment screening and is performed by the Government. ✓ We remain vigilant at all times in the workplace and adopt the approach of always speaking up: If you see something, say something. ✓ We are mindful of changes in colleagues' attitudes, mindsets and loyalties. These changes can sometimes result in people becoming more likely to use their access to our systems and other assets in ways that could cause us harm. We will report any suspicious or unusual behaviour and deal with security concerns when they arise. ✓ We look out for our colleagues and offer support as appropriate. We will not jump to conclusions or assume that a change in a colleague's behaviour means that they are doing something wrong. Just by talking to them to show our concern may help. ✓ Where we have any security concerns, such as those related to changes in behaviour, we raise these with our line manager or contact the Security team at Box.CorporateSecurity@nationalgas.com or call on 0345 30 30 999. You can also phone the Ethics reporting line (0800 0260 488).
Dilemma	A usually lively outgoing team member has become withdrawn and seems anxious. They have changed their working pattern and have frequently been observed working unusual hours and are reluctant to take any holiday. I have noticed they have started to regularly take files home with them. Some of the files appear to contain sensitive information about our infrastructure and security measures. What should I do? The problem could be they have a heavy workload and are struggling to complete assigned work. However, taking sensitive files home would be concerning and you should report the situation to your line manager or contact the Security team.
FAQs	What should I do if I don't feel comfortable raising an insider threat concern with the person or my line manager? You can raise it with the Security team or the Ethics team or contact the Ethics reporting line (0800 0260 488).
What this guidance means to you	The security of our people, and our other assets and information is vital to us and the national infrastructure. Taking appropriate security measures is an important way in which we can help protect both ourselves and National Gas against people who may cause us harm.
Policy Section Owner	Security, IT



Physical Security	
Introduction	National Gas maintains responsibilities as the owner and operator of infrastructure that's critical to the countries we work in. We must ensure all necessary steps are taken to protect this infrastructure. Employee participation in security fundamentals helps keep our people and assets safe and secure.
Principles	✓ Safety of our employees, contractors, visitors and members of the public is our number one priority. To achieve this, we will all: ✓ Challenge others when you are unsure if they should be in that location. ✓ Report any loss or theft from National Gas to the Security Operations Centre. ✓ Report suspicious activity – if you see something, say something. ✓ Use the security arrangements and controls we have in place (e.g. locking gates/doors) and report them if they're not working correctly. ✓ We report all security concerns and incidents to the Security Operations Centre by email box.soc@nationalgas.com or calling 0345 3030 999. ✓ We protect our sites and people by not revealing any security arrangements or sensitive information to people who don't need to know these details. ✓ We do not take photographs, use cameras or recording equipment in secure areas unless there is a clear business reason using approved and safe equipment. ✓ We do not tailgate to avoid security barriers, use others' access privileges, or allow others to tailgate or use our access card.
Dilemma	I would like to be able to leave a security gate open at certain times to facilitate construction access/egress during a project. What should I do? Speak to the Security Operations Centre. Together you may find a temporary solution to accommodate your needs whilst keeping National Gas secure. Gates should not be insecure without security mitigations in place. ----- I'm due to make a business presentation in front of numerous people in a public space. I've noticed activist activity in the media from protestors who appear to be focused on energy sector businesses. How can I ensure my safety while giving this presentation? National Gas's Security team routinely monitors for indicators and communication from protestors and activists who might display an unusual interest in National Gas, our employees and the wider Energy Sector. Contact Security for updates and advice well in advance of any event where National Gas employees are attending. Guidance and information to help all concerned remain safe can be provided.
FAQs	Why should I challenge an unescorted visitor? Isn't that Security's job? Security is everyone's responsibility. When we all look for and challenge unescorted visitors, National Gas becomes a much safer environment for everyone. ----- I have noticed some activity that may compromise our physical security at a location. How do I report it? If you are at a facility/site with a local security team, notify them at the earliest opportunity. Otherwise, contact the Security Operations Centre on 0345 3030 999. Obtain and record full details to provide an accurate account.

What this guidance means to you	Security is everyone’s responsibility. Everyone can help keep our people and assets safe. Challenge behaviour that could threaten our security and report any concerns you have to the Security team.
Policy Section Owner	Security, IT



Community Volunteering, Investment And Sponsorship	
Introduction	We play a vital role in connecting people to the energy we all use, and we recognise the impact our work can have on people and communities. We're at the heart of communities, so investing in and connecting with them is the way we do business. We actively support local charities, initiatives and community organisations because we want every community we work in to thrive, both now and for the long term.
Principles	✓ All requests to contribute to community projects or to make corporate charitable donations are handled in line with our charitable giving guidance and/or Community Grant Fund eligibility criteria and must meet the "delegations of authority" requirements. ✓ No commitments will be made without the appropriate process and authorisation. ✓ Applications must come from charities and community organisations and not from employees. ✓ All employee volunteering activity must take place in line with our Employee Volunteering Policy ✓ All sponsorship requests must be referred to the ESG team within People
Dilemma	Our work in a small community has caused significant disruption. Representatives from the community have asked us to donate towards a new recreational area in the local park. As the overall project has come in under budget, I'm keen to help. What should I do? Project funds cannot be used for donations. Refer to the ESG team for advice. In future, if you expect your work may cause disruption, the Community Relations team can help you plan proactive engagement with the community, manage expectations, and avoid issues before they arise.
FAQs	Can I ask for donations from or for our suppliers, vendors, or customers? Speak to the Ethics and Business Conduct team or the ESG team before asking for any donations, either to be made to, or requested from, our suppliers, vendors, or customers. In most cases we would advise against this. ----- How can I find out more? If you have any questions about employee volunteering, community investment, sponsorship or donations please contact the ESG team.
What this guidance means to you	Getting involved with communities is the way we do business in National Gas. There are lots of ways in which you can make a difference – from volunteering your time and skills to fundraising. See Connect for more information.
Policy Section Owner	People (ESG)



Human Rights

Introduction

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status as defined by the United Nations and respect for human rights is incorporated into our employment practices, business relationships and our values.

Principles

- ✓ All employees of National Gas are treated fairly and in a way that safeguards their human rights.
- ✓ We believe all employees should be able to work freely and receive fair pay in return.
- ✓ We adopt the 'Employer Pays' approach, where no one should have to pay to obtain a job at National Gas or within the supply chain.
- ✓ Our supply chains are required to, and we expect them to adopt the same principles communicated via the Supplier Code of Conduct.
- ✓ We work with our supply chains to align with the principles of the United Nations Global Compact, The Ethical Trading Initiative Base Code, the Modern Slavery Act 2015 and the requirements of the Living Wage Foundation
- ✓ We take responsibility to report, monitor and support remediation of human rights breaches and mitigate against any risk in our supply chain through proportionate, risk based supplier assurance and audit activity

Dilemma

I'm working on a National Gas site with a contractor. Some of the contractor's employees seem unseasonably dressed, have incorrect or no safety equipment and appear to be restricted in the way that they are allowed to engage with me.

What should you do?

These three observations may be indicators of forced labour practices. In these situations, we want you to report this immediately to your manager and the Ethics team. You should not attempt to investigate the situation yourself or challenge the contractor directly. Concerns will be handled confidentially, and retaliation against anyone raising concerns will not be tolerated.

FAQs

I travel to the Far East as part of my role where working conditions are very different. Do these rules apply?

Yes, they apply to anyone we employ, and anyone engaged through our supply chain.

What steps does National Gas take to safeguard against modern slavery and human trafficking?

We recognise that modern slavery and human trafficking are inherent risks in many global supply chains. Based on our current assessments, we consider the risk within our business and first tier supply chain to be low. We produce an annual statement which sets out the steps taken to monitor and manage any potential risk of modern slavery in our supply chain and have recruitment policies in place to mitigate the risk in our direct employee workforce. Furthermore, our Supplier Code of Conduct sets out our expectations and fundamental principles that we expect our suppliers will perform with the highest ethical standards and to comply with all relevant laws, regulations and licenses when working for National Gas. While working conditions and practices may vary by country, our minimum standards do not change.

What this guidance means to you	At National Gas we are committed to maintaining a work environment and supply chain that recognises and upholds the importance of human rights. National Gas has a strong commitment to the communities we serve, and support programs designed to help improve the way people live and work.
Policy Section Owner	Supply Chain



5. People and Behaviour

Drugs And Alcohol

Introduction	We are committed to having a workplace that's free from alcohol and drugs. There will be circumstances where you may be taking controlled or prescribed drugs. In such instances you need to consider whether they could affect you and you should seek advice from your doctor about potential affects. You must tell your manager if there are any potential impacts on your performance.
Principles	✓ Help and support is available to anyone who voluntarily reports a drug or alcohol dependency and anybody needing support should contact their manager or People. ✓ We take responsibility and accountability for ensuring we are not under the influence of alcohol or illegal drugs whilst working for the company. ✓ We understand that while the controlled use of prescription drugs is allowed, if we feel that at any time they may impact our ability to carry out our role safely then we will inform our manager. ✓ We are aware that drug and alcohol tests can be carried out: ✓ if required by law; ✓ before a job offer; ✓ after an incident; ✓ if there is a good reason to believe that a person's work is affected by their use of alcohol or drugs; or ✓ in our random drug and alcohol testing programme (which is carried out on a continual basis).
Dilemma	I'm taking prescription medication that could affect my ability to work, but I don't want to tell my supervisor because I don't want to reveal my medical condition. What should I do? You don't have to tell your supervisor the type of medication you're taking or why you're taking it but if you think that the medication you are taking could affect your performance you must let your supervisor know. Your supervisor can then get advice from Occupational Health to decide if you can do your work safely.
FAQs	If I have a drug or alcohol problem, how can National Gas help? We will support you if you have a genuine problem and want help. Contact your manager immediately. If you do not wish to tell your manager you can instead tell another manager or HR. Our Employee Assistance Programme (EAP) can also give employees and managers confidential support on a range of issues at any time of the day or night, every day of the year.
What this guidance means to you	We aim to maintain a safe, healthy and productive working environment for all employees, customers, contractors and visitors who are involved with our work. We have a duty to ensure our work environment is free from alcohol and drugs and that you never work if you are under the influence of alcohol or drugs.
Policy Section Owner	People



Discrimination, Harassment And Bullying

Introduction	We believe in treating everyone fairly and respectfully. We can all contribute to ensuring our workplaces are free from discrimination, harassment and bullying by promoting an environment where we all treat each other as we want to be treated and in line with our company values.
Principles	✓ We will treat others fairly and equally. ✓ We will not tolerate any type of discrimination, harassment or bullying. ✓ If we are subjected to discrimination, bullying or harassment, we will report it promptly. ✓ We will report any behaviours that we witness that could be considered to be discriminatory, harassing or bullying. ✓ We will not make any video or audio recordings of other members of staff without their permission to do so.
Dilemma	My colleagues came to me and showed me inappropriate text messages sent to her by another employee that made her feel uncomfortable and she doesn't know what to do. What should I do? If your colleague is able to, they should raise their concerns with their manager. If they don't feel comfortable doing that, they should contact People or the Ethics team or call the external reporting line. Alternatively, you could offer to raise this on behalf of your colleague. ----- At our team meetings, one of my colleagues will continuously shout at me and dismiss any of my suggestions which makes me feel intimidated and humiliated. What should I do? These actions could be considered bullying. You should raise this concern to your manager and if you are not comfortable with that, you should contact People or the Ethics team or call the external reporting line.
FAQs	If my manager is pushing me to meet my objectives, is this considered bullying? This is unlikely to be considered bullying. Managing people to reach targets is normal management activity. What is discrimination? Discrimination is when someone is treated unfairly for any of these reasons: ✓ age; ✓ disability; ✓ gender reassignment; ✓ marriage or civil partnership; ✓ pregnancy and maternity; ✓ race (including colour, nationality, ethnic and national origin); ✓ religion or belief; ✓ sex; or ✓ sexual orientation. What is harassment? Harassment can include any unwanted behaviour or conduct that has the effect of creating an intimidating, offensive or hostile work environment, which can be physical action, spoken or written remarks, and videos or pictures.

	Harassment may include: ✔ Derogatory comments or jokes ✔ Mocking, ridicule, or exclusion ✔ Offensive language, imagery, or emails ✔ Bullying behaviour linked to a protected characteristic ✔ Repeated conduct, or a single serious incident What is sexual harassment? Sexual harassment is unwanted conduct of a sexual nature which has the effect of: ✔ violating someone’s dignity, whether it was intended or not; or ✔ creating an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not. What is Bullying? Bullying is any verbal or physical abuse or mistreatment that threatens, humiliates or intimidates an individual. Bullying or harassment can be between two individuals, or it may involve groups of people. It may be persistent or an isolated incident and can occur in written communications, by phone or through email, not just face to face.
What this guidance means to you	At National Gas we are committed to maintaining a work environment that respects people’s differences. None of us should tolerate harassment, bullying or discrimination of any kind.
Policy Section Owner	People



Workplace Violence	
Introduction	We believe in providing a safe work environment for our employees. Anything that threatens the safety of the workplace or any person is not allowed. This includes threats or violence against other employees, customers or property. It also includes any other type of behaviour that puts, or could put, the safety of anyone at risk. We have a zero tolerance for any form of workplace violence, threats of violence, intimidation or attempts to instil fear in employees or other third party. Violent, abusive or threatening behaviour towards a fellow employee or other third party is viewed as Gross Misconduct and will be treated as such under our Disciplinary Policy.
Principles	✓ If we witness or are subjected to any acts of violence or threatening behaviour in the workplace we will report it. ✓ We understand that we are not allowed to carry weapons or other dangerous objects and substances while working for or representing National Gas.
Dilemma	I witnessed an altercation between two employees in which one employee pushed the other employee. What should I do? You should immediately notify your supervisor/manager
What this guidance means to you	At National Gas we are committed to maintaining a work environment that is free from violence.
Policy Section Owner	People

6. Conflicts of Interest

Conflicts Of Interest

Introduction	We will avoid situations where our personal interests could conflict with those of National Gas. A conflict of interest arises when our personal interests or activities could affect our ability to perform our work or make unbiased decisions on behalf of National Gas. Involvement in public duties outside of work is encouraged, but only if there is no conflict of interest, or the appearance of one.
Principles	<u>Outside directorships, second jobs and other outside activities</u> ✓ We will obtain prior written approval both from our manager and the Ethics Manager before taking any outside directorship or second job, or engaging in any other activity that could potentially, or be seen to, present a conflict of interest with our role in National Gas. This includes involvement in any company that is a current or potential supplier to, customer of, competitor to or acts as a regulatory body to National Gas. ✓ We understand that approval will only be given if the role/ activity does not: ✓ affect our ability to do our job or negatively affect our ability to meet the terms and conditions set out in our contract of employment; ✓ cause a real or apparent conflict of interest with our responsibilities as a National Gas employee; ✓ involve our use of company time, equipment or other resources; and ✓ affect our obligations under any relevant laws. ✓ We will declare all outside directorships and any role or significant financial interest that could potentially, or be seen to, present a conflict of interest with our role in National Gas by completing a Conflicts of Interest Declaration. <u>Personal Relationships in the Workplace</u> ✓ A personal relationship is defined as any relationship between employees that could be considered a romantic relationship, any relationship in which employees cohabit, and/or any relationship with a relative (by blood or marriage). ✓ We will declare all personal relationships with any members of National Gas staff by completing a Conflicts of Interest Declaration. ✓ We will immediately inform our manager and the Ethics team if we are involved in a personal relationship with someone in our reporting line or where one party may be in a position to influence areas like pay or commercial decisions. <u>Close Contacts in Other Companies</u> ✓ If a close personal friend, relative or business associate works for any company that is a current or potential supplier to, customer of, competitor to or acts as a regulatory body to National Gas, we will declare this relationship to our managers and by completing a Conflicts of Interest Declaration. ✓ Where we are involved in business decisions involving the third party, we must agree with our managers appropriate steps to mitigate any potential conflict of interest. <u>Conflicts of Interest Declaration</u> ✓ All staff must disclose any potential conflicts of interest, as above, as soon as they are known by completing an annual Conflicts of Interest Declaration. When completing this, we will err on the side of disclosure and amend it anytime something changes during the year.



Dilemma	My brother-in-law is a part owner of a business that is bidding on a contract to provide pipe to National Gas. I have been asked to get involved in the bid evaluation process. What should I do? This situation would present a conflict of interest and should be disclosed to your manager immediately. It's likely that you will not be permitted to get involved (now or in the future) in any decisions related to your brother in law's business. This relationship must also be disclosed on your Conflicts of Interest Declaration. ----- Earlier this year I become romantically involved with my co-worker. I was recently promoted to a higher grade with my companion now reporting up to me. What should I do? You should immediately disclose it to the Ethics team who will take steps to ensure that your companion is not in your reporting line, avoiding any conflicts of interest.
FAQs	I was recently elected to public office. Will this create any conflicts of interest with my job at National Gas? As per the principles in this section, you should have already gained approval from your manager before standing for election. If this hasn't happened, you should tell your manager about the commitment and make sure that: ☑ it doesn't conflict with your working hours at National Gas; ☑ you don't use company resources for your duties in public office; and ☑ you don't use your position to look for favours for National Gas or to grant any favours. You must remove yourself from any discussions pertaining to National Gas and not provide any opinions as they could be construed as the opinion of the company
What this guidance means to you	You must ensure that your financial, employment or other interests, or those of your family or friends, will not affect, or appear to affect, the decisions you make for National Gas. As an employee you will report any personal, financial, employment or other circumstances that could create a potential conflict of interest between you and National Gas using this link.
Policy Section Owner	Business Integrity, General Counsel

Relationships With Third Parties

Introduction	Our relationships with vendors/suppliers are particularly vulnerable to real and apparent conflicts of interest, so we all need to be extra vigilant and exercise caution in our day-to-day business with them. The Suppliers, contractors and business partners of National Gas are an extension of our business and therefore we expect that they are treated as such and are also held to the same standards of conduct as National Gas employees. This is also described in our Supplier Code of Conduct.
Principles	✓ We will treat our suppliers with respect, and we will not tolerate any discrimination, disrespectful or unethical behaviours from or toward our suppliers. ✓ When we are managing supplier contracts or overseeing contractors, we will ensure we understand the terms of the contracts and the obligations of our role in contractor oversight where appropriate. ✓ We will not purchase goods or use the services of any contractor or supplier retained by National Gas for private purposes, except under the normal terms and conditions of that contractor or supplier (or under special arrangements negotiated by National Gas for the benefit of all employees). ✓ When we buy goods or services on behalf of National Gas, we will disclose in writing to our manager any personal interests or associations that might appear to impair or conflict with our ability to make objective procurement decisions. ✓ We will comply with procurement policies that relate to identifying potential suppliers, bids, negotiations, contracts or sole source justifications, managing orders and contractors, and payment of invoices. If we are involved in procurement tender events, we will keep all bidding information confidential. ✓ If a close personal friend, relative or business associate of ours works for any company that is a current or potential supplier to, a customer of, a competitor to or acts as a regulatory body to National Gas, then we will declare this relationship to our managers and by completing a Conflicts of Interest Declaration. ✓ We apply a risk based approach to managing relationships with third parties, proportionate to the nature, location, criticality and services provided.
Dilemma	A close friend owns a business that is bidding on a contract to provide services to National Gas. If she wins the bid she would be providing services to my department and I would be able to work with her each day. I would like to work with my friend and I also want her to succeed in her business. She asked me if I could obtain copies of bids submitted by other businesses bidding on the same contract. What should I do? You should tell your manager about your relationship and the request your friend has made. You should also declare the relationship by completing a Conflicts of Interest Declaration. Do not provide your friend, or any outside party, with information that would give them an unfair advantage when bidding on a contract. ----- A contractor that I work with has confided in me that he feels he is being harassed and bullied by a National Gas employee. What should I do? Let him know that he can get in touch through any of the means National Gas has in place, including the confidential speak up line, to report concerns or offer to report this on his behalf. His concern will be investigated thoroughly and promptly. The company takes all concerns brought to its attention seriously.

FAQs	I have been made aware that one of our contractors is undertaking an activity that is potentially unlawful. What should I do? You should immediately notify your manager about the contractor’s activity, and the Ethics Team. Our vendors and contractors are important business partners who must be held to the same standards of conduct, because our reputation is at stake.
What this guidance means to you	We need to hold all third parties including our vendors/suppliers and contractors to the same ethical standards as our employees. If you are responsible for third party oversight you should recognise the additional responsibilities that are expected of you. You should realise the importance of our relationships with suppliers, customers and other third parties, as well as how these relationships are managed where real or perceived conflicts could arise. You need to be extra vigilant and make sure you adhere to the relevant procurement policies. If you are responsible for third party oversight, you should recognise the additional responsibilities that are expected of you, including compliance and escalation.
Policy Section Owner	Supply Chain



Price Sensitive Information, Insider Trading And Material Non-Public Information

Introduction	Information is 'price sensitive' when: ✓ it's precise; ✓ not yet public knowledge; ✓ relates directly or indirectly to the Group's business or its listed securities including financial instruments; and ✓ if disclosed, might lead to a significant movement (up or down) in the price of the securities including financial instruments such as retail bonds. It includes information that would have a substantial likelihood of affecting a reasonable investor's decision to buy, sell or hold securities issued by the Group. The term 'price-sensitive' applies to information about securities of any company listed on the stock market. It's also known as 'inside information'. In our case we retail bonds listed on the London Stock Exchange. By their nature the price of bonds is more stable and therefore the information that could be price-sensitive is likely to need to be of a higher level of materiality than if we had listed shares. Nonetheless the same rules apply once inside information exists. It's a legal requirement that if you have access to price sensitive information you must be named on a specific list that the Group is required to maintain. This is called an Insider List and means you will be considered to be an Insider.
Principles	✓ We understand that it is illegal to unlawfully disclose price sensitive information; this means if we require access to price sensitive information in order to carry out our job, we will keep that information confidential. Also, we will not share the information with anyone else except where we are required to do so by law or as part of our employment. ✓ We understand that if we have access to price sensitive information, we will be considered an Insider and therefore must not deal in securities issued by companies in the Group without obtaining prior clearance from the Legal team. ✓ We understand that if we are granted clearance to deal and use price sensitive information to influence our securities dealing, this is called 'insider dealing', which is illegal. Insider dealing isn't limited to financial information and can apply to information about the activities and future prospects of any other company listed on the stock market. This applies whether we are doing this in person or through an intermediary. We may also be responsible if we pass price-sensitive information on to a third party, who then uses it to buy or sell securities. ✓ We understand that we cannot use price sensitive information to influence our dealings and we must not recommend or induce anybody else to engage in insider dealing, as this is also illegal. ✓ We will only share price sensitive information where required to do so by law or as part of our employment and prior to obtaining clearance from the Legal team. ✓ Where we think we may have access to price sensitive information and have not been informed that we are classified as an Insider, or where we require more information, we will contact the Legal team immediately.
Dilemma	Recently I overheard two employees talking about the possibility of National Gas buying another company. I checked the market listings and found out the other company's share price is down because they haven't been performing well. If National Gas announces its plans to buy this company, the value of that company's stock will increase. I realise I can't invest in this company because I work for the National Gas group. However, my parents just sold their home and have a large sum of money they are looking to invest.



	Can I tell them that National Gas is thinking about buying this company and/or recommend that they make an investment? No. It's illegal to pass on price-sensitive information to others, even if you don't make any investments yourself. The laws on insider dealing contain severe civil and criminal penalties. You should never use price-sensitive information to make, or encourage others to make, investments in shares or other securities. This also applies to investments in other companies National Gas might be planning to buy or merge with.
FAQs	What are examples of potentially price-sensitive information? ✓ Exceptional events or facts in the annual or half-yearly financial results. ✓ Major business developments (such as substantial projects or regulatory developments). ✓ Circumstances which may affect the issuer's ability to pay amounts due under the debt securities ✓ A buyback of a significant percentage of outstanding bonds. ✓ Changes to the issuer's credit rating ✓ Dividend announcements. ✓ Major deals to buy or sell a business. ✓ Significant changes in our financial condition or business performance. ✓ Significant changes in expectations of our performance. ✓ People being appointed to, or leaving, our Board of Directors. ✓ Major contracts awarded. ✓ Significant potential legal action.
What this guidance means to you	Never deal using price-sensitive information because that's insider dealing, which is illegal. Be aware at all times to never disclose price-sensitive information to a third party because this could lead to insider dealing.
Policy Section Owner	Legal, General Counsel



7. Anti-Corruption and Transparency

Fraud, Bribery and Corruption

Introduction	We are committed to preventing, deterring and detecting fraud, bribery and all other corrupt business practices. To protect our organisation, we have a compliance programme to detect and prevent fraud, bribery, financial crimes, money laundering or other corrupt business practices that can seriously damage our reputation, as well as cost us money.
Principles	✓ We're all responsible for controlling the risks of fraud, bribery, financial crimes, money laundering and corruption. ✓ We all take individual responsibility for ensuring that we never participate or engage in fraudulent activity, offer/ accept bribes or engage in other corrupt business practices. ✓ We will always investigate any related concerns. ✓ We expect employees, suppliers and agents to comply with the laws that prohibit bribery and corruption, wherever we work in the world
Dilemma	Following completion of emergency work by National Gas, a customer approaches me with a gift with a value greater than £50 to thank me for my work. What should I do? In the first instance, we would recommend that you thank the customer for the kind offer but refuse the gift and advise your manager of this situation. If you wish, you could advise the customer that National Gas has in place recognition schemes for our employees and if they wish, these details can be shared. If you feel that your personal safety may be compromised, you should take the gift and report it immediately to your manager and the Ethics team. Be aware that we can never accept cash of any value.
FAQs	What is fraud? Fraud is a crime. It's a deception that's designed to benefit someone or cause a loss to someone else. What is bribery? Bribery is when anything of value is given in return for influencing the way someone performs their duty. It could include a duty to carry out a public office (such as a policeman or official who approves permits), a commercial duty (such as an employee who should act in the best interest of their employer) or some other legal duty. Bribery doesn't have to involve an actual payment changing hands. In fact, it can take many forms, including a gift, lavish treatment during a business trip, property, an offer of employment, or tickets to an event. Examples include: ✓ bribing an agent acting for a landowner in order to get permission to build on the land; ✓ bribing a foreign official to make sure goods get through customs; and ✓ bribing a health and safety inspector so they turn a blind eye to problems. Other corrupt business practices: Money laundering is transforming the proceeds of crime into legitimate money or assets. Criminal facilitation of tax evasion is when someone providing a service for or on behalf of National Gas criminally facilitates tax evasion and National Gas did not have procedures in place to prevent it.

What this guidance means to you	You must keep to the highest standards of honesty, integrity and ethics at all times when working for us. Every employee is responsible for controlling the risks of fraud, bribery and corruption. If you know about, or suspect, any illegal activity, you must report it to the Ethics Team, regardless of who is responsible. You should never look the other way.
Policy Section Owner	Business Integrity, General Counsel



Gifts and Hospitality

Introduction

We do business, and have relationships with many people, such as suppliers, vendors and customers. Sometimes they (or we) might offer meals, hospitality and business entertainment. There may also be certain circumstances where we receive gifts from, or offer them to, people outside National Gas.

All of this may seem harmless, but it can create a real or perceived obligation, potentially leaving us vulnerable to accusations of unfairness, bias, deceit or even bribery. Our personal or business reputation may be put at risk. Therefore, we have this guidance and controls in place to protect ourselves as employees and the interests of our company

Principles

- ✓ We will consider the following important question before offering or accepting gifts or hospitality: is it serving a legitimate business purpose?
- ✓ We will not let our decisions be influenced – or appear to be influenced – by gifts or hospitality that our suppliers, vendors, customers or others may offer.
- ✓ We will not try to influence – or appear to be trying to influence – others by providing gifts or hospitality.
- ✓ We will neither make an offer to, nor accept gifts or hospitality from, a vendor or supplier that is involved in a current tender/request for proposal (RFP) event which we personally are taking part in, and we will let our manager know if we do receive an invitation or gift [personally involved means acting as part of the team preparing and evaluating the tender or may include the DOA approver(s)].
- ✓ If we wish to make an offer to, or accept an invitation or gift from, a vendor or supplier that is involved in a current tender/RFP event with National Gas but that we are not personally involved with, we will refer the request to the Ethics Manager and the Supply Chain Director who will determine whether the offer/acceptance is appropriate.
- ✓ As an exception to the above, Supply Chain team members may make an offer to, and accept hospitality from, strategic suppliers and framework suppliers when mini-tenders are in flight under existing Frameworks, but we will let our manager know in advance to enable the risks to be assessed and we will comply with ethics reporting requirements. Where Supply Chain team members are in a spot tender or refreshing a Framework we will refer the request to the Ethics Manager and the Supply Chain Director who will determine whether the offer/acceptance is appropriate.
- ✓ We will be mindful if hospitality, entertainment or gifts are being offered regularly by one person or organisation. At a minimum this could be viewed as an attempt to influence business decisions, or perhaps it is an actual attempt to influence our decision making. In such situations we understand that we need to decline the offer and raise this issue with our supervisor/manager
- ✓ We will not accept or offer an invitation to offensive or inappropriate entertainment.
- ✓ We will not offer or accept money or gifts to or from politicians, government officials or regulators, and we will comply with the rules set out in the Political Interaction and Lobbying section of this Code.

Gifts

- ✓ We will never offer or accept cash or cash equivalents (like gift cards, cheques or shares).
- ✓ Gifts of nominal value (up to £20 per head) can be accepted with no need to record.
- ✓ Gifts with a value between £20 and £50 per head can be accepted, but need to be recorded in the Gifts & Hospitality system.
- ✓ Gifts with a value greater than £50 per head cannot be accepted, other than in exceptional circumstances and with the prior approval of a member of the Executive.



Dilemma	- These values are cumulative over a year; if you receive multiple gifts from the same person/company within a year, you need to consider the total value of these gifts against these rules. - Offers of gifts with a value above £20/head need to be recorded in the Gifts & Hospitality system regardless of whether the gift is accepted or not. Meals, entertainment and hospitality - Hospitality of nominal value such as refreshments, working lunches, etc. (up to £20 per head) can be accepted with no need to record. - Hospitality with a value between £20 and £50 per head can be accepted, but needs to be recorded in the Gifts & Hospitality system. - Hospitality with a value between £50 and £500 per head can be accepted, but needs to be recorded in the Gifts & Hospitality system and approved by your line manager (minimum Band C). - Hospitality with a value greater than £500 per head can be accepted, but needs to be recorded in the Gifts & Hospitality system and approved by a member of the Executive. - Approvals should be obtained in advance where practicable, but it is recognised that this will not always be possible, e.g. a last-minute hospitality offer; in such circumstances staff should use their judgement as to whether to accept and seek approval afterwards. Hospitality in excess of £500/head should always be approved in advance. - Offers of hospitality with a value above £20/head need to be recorded in the Gifts & Hospitality system regardless of whether the gift is accepted or not.
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Summary	Value per head being offered or received (whether accepted or not)				
	£0-£20	£20.01 - £50	£50.01 - £500	£500.01+	Cash of any value
Gifts (Cumulative value over a year)	No record or managerial approval required	Need to record. No managerial approval required	Cannot give or accept gifts worth more than £50*, or cash of any value (but any offers need to be recorded)		
Hospitality			Need to record. Manager's approval (Min Band C) required	Need to record. Exec approval required	N/A

*In exceptional circumstances may offer/receive a gift worth more than £50 but this requires prior approval from an Exec member

FAQs	A large holiday gift basket of fruit and other perishables was shipped to me from a vendor. What should I do? Since it's a perishable item and difficult to return, you can share the basket with the rest of the department. This reduces the per person value below our nominal gift value. ----- Hospitality: My partner and children have been invited to an event. Can they go? Partners and children may attend events, but the event must serve a legitimate business purpose. If you're not attending the event yourself, or your host will not be there, it's unlikely that there will be any legitimate business purpose and therefore your partner and children should decline.
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What this guidance means to you	You should not allow gifts or hospitality to influence your business decisions, personal judgement or appear to do so. You should use this link to make Gifts and Hospitality declarations. If you have any concerns or need more guidance, speak to your manager or contact the Ethics Team.
Policy Section Owner	Business Integrity, General Counsel



Business Travel & Employee Expenses

Introduction	We have policies and guidelines for incurring reimbursable business-related expenses on behalf of the Company. Our policies are designed to enable adequate controls to minimise costs ensuring accuracy of cost allocations and legitimacy of all business expenses claimed. The Company will reimburse ordinary, allowable and reasonable expenses you incur on behalf of the company when you: properly submit claims for these expenses, comply with prudent business practice and exercise prudent business judgment.
Principles	✓ We all take responsibility for the legitimacy of expenses that we claim, and the adequacy and authenticity of supporting documents that we submit, including but not limited to any required receipts. ✓ We will submit expenses in a timely manner. ✓ We will familiarise ourselves with the expenses and business travel policies, relevant cost allocation guidelines, supporting systems and reimbursement procedures. ✓ If we are an approving manager, we will apply due diligence by making sure all claims are accurate, prudent and reasonable business expenses that have been incurred wholly and exclusively for legitimate business purposes and have proper back up documentation. ✓ We will obtain management approval for all categories of business travel and expenses before incurring them, where practical. ✓ We will book all travel via the company appointed service provider. ✓ We understand that where expenses incurred are for more than one individual, e.g. a team event, the most senior person present will submit the expense.
Dilemma	I'm a manager and have taken my team out for a group dinner in recognition of a recently completed project, who should pay and claim reimbursement? If you are the most senior employee in attendance you should be the one paying and claiming reimbursement. Additionally, you should include the names of all employees in attendance on the receipt.
FAQs	Q: If I'm travelling and staying with friends or family instead of using a hotel, am I entitled to any additional compensation? A: Whilst travelling on National Gas business, employees may stay with friends or family and can (if approved by your line manager) be reimbursed for providing a host with a small gift (e.g. chocolates or flowers) up to the value of £25 per night. A receipt must be obtained and submitted as expenses. ----- Q: Tipping and gratuities are customary and, in some cases, required when dining or in other circumstances. Can I claim gratuities as a reimbursable expense? A: Yes. You should include gratuities as part of the total cost of service you're requesting reimbursement for. You do not need to claim them separately. We just ask that you please be prudent when providing gratuities.
What this guidance means to you	National Gas is committed to giving you clear and consistent guidelines for incurring reimbursable business-related expenses on behalf of the company. Be familiar with policies, guidelines and processes related to reimbursable business and travel expenses as well as the different types of acceptable expense categories.
Policy Section Owner	Supply Chain



Use of Company Resources	
Introduction	The company assets you rely on for your work (for example, computers and phones) are intended to be used for our business. Where appropriate, we have provided you with the things you need to do your job, such as a computer/laptop or a mobile device such as a phone/tablet.
Principles	✓ We understand that we can use our mobile device for limited occasional personal use, but this must not interfere with our work or the work of others, breach IT policies, break any laws, or incur significant cost to the company. ✓ We understand that using company vehicles (cars, vans and aircraft) for personal use is not allowed unless it's specifically authorised (for example, company cars that are provided for private and company use). ✓ We understand that company property and resources such as facilities, equipment and information are provided for business purposes only and therefore not allowed for personal use. ✓ We take responsibility for the security of the company equipment we use.
Dilemma	A couple of my colleagues have been using a company excavator or backhoe to do some work on their personal property. What should I do? Using company resources for personal purposes is not allowed. You should raise your concern to your line manager or speak to the Ethics team. The unauthorised use of company equipment is considered theft which is fraud. ----- One of my colleagues is using his company computer to run an accounting side business. Is this acceptable? No. Company computers/laptops cannot be used to conduct a personal side business.
FAQs	Can I use mailing supplies to post some important personal papers? No, use of postage stamps, franking and postal supplies such as envelopes is not allowed. You may place personal mail in the outgoing mail tray as long as you use your own postal supplies and have already paid the postage. ----- Is gambling allowed on company property and/or using company resources? No, gambling or gambling activities are not allowed on National Gas property.
What this guidance means to you	We're all responsible for protecting our resources and making sure they're used appropriately.
Policy Section Owner	Business Integrity, General Counsel



Political Interactions and Lobbying

Introduction

With so much of our work in the public eye, it is only natural that we will meet with politicians and civil servants. While it is important to build and develop good relationships, it is also important that we manage them appropriately. Lobbying laws can be complex, and carry severe penalties if breached.

As a reminder:

- ✓ Politicians are defined as individuals in elected offices (for example: Ministers, MPs, MSPs, MSs, MLAs, Mayors, and Councillors).
- ✓ Civil servants are employed by government, working across departments and public bodies (for example Permanent Secretaries, Director Generals, or Directors in government departments such as DESNZ or HM Treasury).

Principles

- ✓ We will always be open and transparent in our dealings with civil servants.
- ✓ We will not offer or accept money to or from elected officials, civil servants, or public bodies.
- ✓ We will comply with the international, national, and regional laws and regulations that apply to interactions with elected officials, civil servants, or public bodies. For example, there is a lobbying register to comply with in the Scottish Parliament and Government, but not in the UK Parliament and Government. (See below for further information specific to lobbying in Scotland).
- ✓ We will offer and receive entertainment in line with declaration requirements (and limits) outlined by our Ethics and Legal teams, mirroring the central entertainment policy. National Gas has an [entertainment form](#) that needs to be submitted before offering or receiving hospitality and gifts.

Corporate Affairs owns National Gas's relationships with elected officials, civil servants, and public bodies – so always let them know if you are meeting or working with any of the following on our behalf:

- ✓ An elected official (such as a Minister, MP, MSP, MS, MLA, Mayor, or Councillor).
- ✓ A civil servant (such as a Permanent Secretary, Director-General, Director, or policy official in any UK Government or devolved government department).
- ✓ A non-departmental public body (such as the Climate Change Committee, or the National Infrastructure and Service Transformation Authority).
- ✓ An interest group (such as the CBI or the Green Alliance).

When you are working with elected officials, civil servants, or public bodies, it is important that you keep any personal political interests or activities separate from your role as a National Gas employee. You should also comply with the Association of Professional Political Consultants (APPC) Code, the Bribery Act, and the Political Parties, Elections and Referendum Act.

Lobbying Register in Scotland

- ✓ The Scottish Lobbying Act 2016 introduced a new public register for 'Regulated Lobbying' in Scotland.
- ✓ All employees of National Gas are required to record any engagement with:
 - ✓ Members of the Scottish Parliament (MSPs)
 - ✓ Ministers in the Scottish Government (Cabinet Secretaries, Junior Ministers, or Law Officers)
 - ✓ The Scottish Government's Permanent Secretary
 - ✓ Scottish Government Special Advisers



	✓ There are financial penalties for failure to comply with the Act. ✓ Corporate Affairs are responsible for managing the Scottish Lobbying Register, so it is crucial to make them aware if you have any engagement with the elected officials or civil servants listed above in Scotland (corporateaffairs@nationalgas.com).
Dilemma	I have invited two well-known Members of Parliament (MPs) to speak at an event that my team is hosting. They have accepted the invitation but have asked for a small payment in return for attending. We think their contribution will be useful for us. What should I do? While the MPs' contribution may be valuable, you must not give them money under any circumstances. In addition, you should speak to Corporate Affairs in the first instance, as they should make any approaches to MP on your behalf since they own that relationship.
FAQs	What should I do if a Member of Parliament (MP) only agrees to attend a meeting or function if we pay for their travel and accommodation? You can offer expenses, but only if they are deemed reasonable and proportional. This would include situations where MPs must travel from their usual location to attend a meeting, or where they would have to stay overnight to attend a meeting or function. Can I offer civil servants hospitality? There is no ban on civil servants having dealings with lobbyists and companies where this serves a proper purpose and is conducted in a proper manner. Any engagement would need to be declared on the National Gas entertainment form beforehand. It is important to remember that the need for propriety is crucial. When deciding whether to accept hospitality, civil servants must judge whether: there is benefit to the government accepting the invitation; whether the entertainment is lavish, on a scale which could not personally be afforded; whether they are accepting too much hospitality from the same source; and, if their post is prominent, whether just their attendance at an event may be open to interpretation as a signal of support. As best practice, we would not recommend spending more than £30 per civil servant and occasion. Some departments will also have specific regulations around hospitality that civil servants will have to follow. If you feel offering hospitality could breach any of these tests, it should not be offered. All hospitality accepted by the civil service is declared and made publicly available.
What this guidance means to you	Working with politicians and civil servants is an important part of the work we do. You will be open and honest in any dealings with politicians and public and government officials. You will follow all regional requirements related to interactions with government/public officials and must seek guidance from Corporate Affairs or Legal in advance.
Policy Section Owner	Corporate Affairs



Competition	
Introduction	Competition is generally recognised as a good thing for consumers as it helps keep prices for goods and services down. Competition may naturally occur, for example between supermarkets. Where it doesn't, regulation may be needed to ensure businesses that have limited, or no, competitors still behave in a fair manner.
Principles	✓ We will always seek legal advice before entering into arrangements that might be viewed as anti-competitive (including sharing confidential or commercially sensitive information). ✓ We will always act fairly and not place anyone at an unfair commercial advantage or disadvantage, including affiliated entities. ✓ We will be objective, fair and non-discriminatory in all our dealings with potential customers and suppliers. ✓ We will keep relevant documented evidence of our decisions and interactions with customers, suppliers and competitors and ensure all communications are written clearly, professionally and responsibly. ✓ We are all responsible for ensuring resources are not cross subsidised. ✓ We understand that an informal understanding or agreement that may affect competition will be treated by the competition authorities in the same way as a formal legal agreement.
Dilemma	I am bidding to win work through a competitive tender process. I haven't had explicit discussions with any competitors or other sources, but I am generally aware of the types of prices our competitors may bid for such work. What should I do? Make sure you consider your prices on a standalone basis, rather than based solely on what your competitors may bid. As a minimum, you should aim to recover all your costs and make a reasonable profit within any applicable regulatory framework in which you are operating. General market intelligence can be useful, but it cannot be obtained through inappropriate means such as: ✓ directly from competitors; or ✓ discussing competitors' prices with customers. If you have any queries or concerns about discussions relating to competitors or how you price your bids, please contact the Legal Team.
FAQs	What should I do if I'm worried that I might have broken, or be about to break, competition law? Contact the Legal team, which will be able to advise you. What takes priority – competition law or the licences? Neither – both apply where relevant, although Ofgem is required to consider using its competition powers, where appropriate, before using its regulatory powers. Competition law applies to all our activities, not just our regulated businesses.

What this guidance means to you	This guidance will help you make sure we act fairly and don't give anyone an unfair commercial advantage or disadvantage. You should never agree to 'fix' any market and you must be seen to be acting in a non-discriminatory way at all times. Always record the reasons behind your decisions. This will help you demonstrate that what you are doing isn't breaking the rules.
Policy Section Owner	Legal, General Counsel



8. Information and Communication

Data Privacy

Introduction	Personal information is any information that can identify an individual directly (for example their name or e-mail address) or indirectly when combined with other information we hold. This includes factual details like a photograph, bank account number, identification numbers or a computer IP address, as well as opinions or assessments, for example, interview notes or performance related feedback. Some personal information is more sensitive and requires greater protection. This includes information relating to an individual's health, race, religion, sexual orientation, or trade union membership. These categories are known as special category personal data under data protection law. The UK General Data Protection Regulation (UK GDPR) and associated data protection laws require us to handle personal information lawfully, fairly, transparently, and securely. This includes ensuring appropriate safeguards are in place especially when personal information is shared with third parties or transferred outside the UK. Every one of us as has a responsibility to protect personal information we access or handle. This means taking steps to ensure it is not lost, misused, accessed without authorisation, shared inappropriately, altered without justification, or destroyed prematurely.
Principles	✓ We comply with National Gas's data privacy policy and all applicable data protection laws. ✓ We respect individuals' rights over their personal information. ✓ We collect, use, and share personal information only for clear, legitimate purposes. ✓ We confirm and record any required consent before using or disclosing personal information. ✓ We keep personal information only as long as necessary and dispose of it securely. ✓ We share personal information with third parties only when legally permitted and in line with policy. ✓ We protect personal information against unauthorised access, loss, misuse, or alteration. ✓ We maintain personal information so that it is accurate, relevant, and up to date. ✓ We follow established procedures for handling privacy incidents, complaints, and disputes.
Dilemma	I realise that I have sent personal information by mistake to someone who should not have access to it and does not have a business reason to see it. What should I do? Any incident involving personal information being sent to the wrong recipient, or any other potential data breach must be reported immediately. Contact the Cyber Response team via cyberresponse@nationalgas.com or call 0345 3030 999 and inform your line manager.
FAQs	Who can I share personal information with at work? Only share personal information when there is a clear business need, and it supports the reason the data was collected. It must be relevant, necessary, and shared only with those who need it to carry out their role. -----

	Can I share individual performance or feedback data with others in my team? No, individual performance information is confidential and should only be accessed by the person it relates to and those directly involved in the managing or assessing their performance. Team-level performance can be shared if it is anonymised or aggregated.
What this guidance means to you	This guidance helps ensure that we handle personal information safely, securely, and in line with the law. It protects individuals' rights and supports responsible handing of data across the business.
Policy Section Owner	Business Integrity, General Counsel



Electronic Communications	
Introduction	Electronic communication, which includes email, internet, and apps, brings many benefits to businesses. It can reach many people, over great distances, almost instantly. However, it also brings a number of risks and potential problems. When it comes to electronic communications, be cautious. You should always be aware that they have the potential to damage our company or people. For example, they may carry computer viruses that can infect our systems, be from an untrustworthy source, or they may be misinterpreted and cause offence. They could also affect our reputation and electronic messages may need to be disclosed in court proceedings or investigations.
Main points Principles	✔ We will take responsibility for how we use our company email, internet access and applications and will do so in line with National Gas policies, standards, and procedures, in particular, our SECPOLO9 – Acceptable Use Policy V1.0. ✔ We will not use these tools to: ✔ Download or pass on material that is dangerous, offensive, or illegal. ✔ Download and/or install any unauthorised software or applications. ✔ Conduct any illegal activities. ✔ Send or solicit messages that are political, religious, or activist. ✔ Violate any licence agreement, copyright, or trademark law. ✔ Impersonate anyone online or maliciously change any messages. ✔ Produce, introduce, or forward chain letters or personal video clips. ✔ Send unsolicited junk messages. ✔ We will comply with National Gas's security controls when accessing our communication systems or internet facilities. ✔ We understand that limited personal use is allowed, but that use must not: ✔ interfere or create conflict with our work. ✔ take priority over our work. ✔ give rise to any risk, liability, potential loss, or expense for the company. ✔ have any negative effect on the company (refer to Social Media section for further details).
Dilemma	I have received an email that I wasn't expecting that includes an attachment. What should I do? If in any doubt about the validity of the email you have received, you must not open any links contained within the email and should report these to Security via cyberresponse@nationalgas.com or click the "Report Phish" button in Outlook.

FAQs	Can I use the Internet for personal use during my breaks? Yes, as long as it is limited and used in line with the requirements detailed above under Personal Use. ----- Can I use my work email to enter a non-work related competition? No, it could make you or our system vulnerable to a security incident.
What this guidance means to you	We allow you to use your email and the internet for limited personal reasons, and within the law, as long as it doesn't affect your work or expose you or the network to risk. Be aware of social engineers. These are people who pretend to be someone they are not so they can gain information about yourself or National Gas.
Policy Section Owner	Security, Technology



Information Security

Introduction	We're all responsible for protecting information from deliberate, accidental, or unauthorised access, and from being altered, destroyed, or disclosed. This applies to information held electronically (soft copy), on paper (hard copy), or in our minds (have knowledge of). Sharing information and ideas within National Gas is great for our business and allows us to make the most of information technology. But there are risks. If our confidential or sensitive information falls into the wrong hands, it could be used to damage our (and our partners') reputation and business operations. The same applies to confidential or sensitive information we have about our employees, business partners or suppliers.
Main points Principles	✓ We understand the data classifications and classify information we create and handle. ✓ We will only share information with those that have a business need and are entitled to receive it. ✓ We store and dispose of information in line with our relevant policies. ✓ We will protect our access to information by having strong. passwords/passphrases, being careful where we have confidential conversations, and keeping our workspace clean. ✓ We will keep passwords/passphrases confidential and will not share details of these with anyone.
Dilemma	I know I'm not supposed to share my log-in ID and password/passphrase, but we really need to get this work done while I'm on holiday. What should I do? You cannot share your log-in ID or password/passphrase. The reason you must never share your log-in ID and password/passphrase is simple – if you do this, you're effectively allowing someone else to 'be you' on our systems, and that's not acceptable under any circumstances. You are expected to act responsibly whenever you log on to our systems. If you reveal your log-in details to someone else, you're breaking that trust. If you know there is going to be a problem, contact IT as soon as possible and explain the situation. They will then start working on a secure solution for you. You can also utilise the new O365 collaboration tools to share documents securely.
FAQs	What do we mean by 'information'? Information covers all forms of written, printed, verbal and electronic material. It includes information that: ✓ you talk about or hear in meetings; ✓ originates from informal discussions or conversations; ✓ is saved on storage media (for example, disk, memory stick or hard drive); ✓ is held on a computer/mobile device; ✓ is being sent over communications lines including Instant messages, Skype chat, Teams chat, What's app, iPhone texts, Yammer etc;

	☑ is held in digital, graphic, text, voice or image format; and ☑ is held in an electronic form on your personal devices. You may also hear the term ‘data’ used, which is sometimes used interchangeably with ‘information’. Am I allowed to access O365 (including MS Teams and Outlook) on my personal device? Yes, as long as you are connected to a secure network. ----- What is multifactor authentication? Multifactor authentication (MFA) is necessary to keep us safe and secure from malicious individuals and is a standard requirement for accessing National Gas systems and data. For more information please go to the IT Portal or call the IT helpdesk.
What this guidance means to you	We’re all responsible for protecting information. You should always be on your guard because the content of some emails, faxes (some fax machines and printers have a memory store), text messages, voicemail messages and other recorded conversations could cause significant problems if they’re not protected and an unauthorised person has access to them.
Policy Section Owner	Security, Technology



Managing Records

Introduction

National Gas recognises the value of business-related records as a corporate asset and records management as a key corporate function. Every employee, as an Information User, is responsible for creating, maintaining and preserving accurate records (in any format) that support and document their activities.

Efficient management of information and records is necessary to:

- ✓ support and provide evidence of National Gas core functions,
- ✓ to comply with its legal and regulatory obligations,
- ✓ to meet accountability requirements and stakeholder expectations,
- ✓ to enable the effective management of the company,
- ✓ to advance its strategic priorities.

Main points Principles

The following principles should be adhered to when creating or managing information and records in any format:

Principle 1 – The record is accurate

Principle 2 – The record can be accessed

Principle 3 – The record can be interpreted

Principle 4 – The record can be trusted

Principle 5 – The record can be maintained throughout its lifecycle

Principle 6 – The record is valued

FAQs

What is a record?

A record is information created, received and maintained as evidence and information by an organisation or person, in relation to legal obligations or in the transaction of business.

Who is responsible for managing information and records within National Gas?

- ✓ *All employees are responsible for creating, maintaining and preserving accurate records that support and document their activities in accordance with this policy
- ✓ *All Information Owners are responsible for ensuring that all records within their area of responsibility are managed in line with the Information and Records Management policy as well as any associated guidance and procedures.
- ✓ *The Records Manager is responsible for developing and supporting compliance with this policy including the development of retention schedules
- ✓ *National Gas owns all information and records created by its employees in the process of carrying out its related functions and activities. Records received by National Gas are also its property unless the originator asserts ownership.

My team creates a lot of information and records as part of their day-to-day activities. Where can I find guidance on how long we should retain it for?

Each team within National Gas should have a retention schedule which sets out how long information and records should be retained for and how to dispose of them when the time is right. Consult your line manager in the first instance or contact the records management for further guidance (box.recordscentre@nationalgas.com).

What this guidance means to you	All company records, information and communications should be complete, fair, accurate, easy to understand and produced in a timely manner. You should make sure they're stored in appropriate systems.
Policy Section Owner	Business Integrity, General Counsel



Social Media

Introduction

At National Gas, our Code of Ethics serves as a cornerstone for maintaining our integrity and reputation.

Purpose: This document outlines the ethical principles and standards that guide our behaviour, ensuring that we conduct our business with honesty, transparency, and respect.

Scope: The Code of Ethics applies to all employees, contractors, and stakeholders associated with National Gas.

In today's interconnected world, the lines between personal and professional conduct can often become blurred. It is crucial to remember that actions taken in personal capacities can impact professional responsibilities and the company's reputation. Therefore, employees are expected to uphold the same ethical standards both inside and outside the workplace, avoiding any behaviour that could be deemed inappropriate or harmful to National Gas's values and mission.

People are increasingly talking about National Gas on social and digital media channels such as X (formerly Twitter), LinkedIn, Facebook, Blue Sky, Instagram and TikTok, and it's important that we are aware of the conversations taking place about the business. This will help us to understand the needs of our customers and the communities we serve. A conversation that takes place online can be just as important as a letter or email.

Main points Principles

- ✓ We only engage with National Gas's social media channels in a positive way. Any complaints should be directed to the correct internal channels, via connect, or to your line manager.
- ✓ We only speak on behalf of National Gas, respond to customer queries or company crises on social media where we are authorised to do so by Corporate Affairs.
- ✓ When using social media, we will do so in a manner consistent with National Gas's values and social media policy.
- ✓ We never disclose confidential corporate information when using social media. For example, by:
 - ✓ Referring to confidential information about an individual or business materials.
 - ✓ Disclosing insider information – for example financial or strategic information about the company that is not public.
- ✓ We will never act in a way that could bring National Gas into disrepute. For example, by:
 - ✓ Criticising, disagreeing, or arguing with consumers, clients, colleagues, competitors, or managers.
 - ✓ Sharing content that criticises our competitors.
 - ✓ Getting involved in arguments with journalists or other media to defend us.
 - ✓ Pretending to be someone else to promote us above competitors.
- ✓ We only use the National Gas brand in any social media posts handles/ usernames/ profile images where we are authorised by Corporate Affairs to do so.
- ✓ We report any social media concerns to the Corporate Affairs (corporateaffairs@nationalgas.com) and Ethics (box.ethics@nationalgas.com) teams, where appropriate.
- ✓ We will not use our official National Gas email address or any other National Gas details when participating in social media or online. This includes LinkedIn as using National Gas email addresses increases phishing vulnerability and data leakage.



- ✓ The 'Dos and Don'ts' of social media. Please consider what you are posting and, if you are unsure, please contact Corporate Affairs (corporateaffairs@nationalgas.com).

Do:

- ✓ Respect and abide by the rules, norms, and guidelines of each social networking site.
- ✓ Use common sense.
- ✓ If discussing National Gas online, be transparent and open. Always disclose your name, company and position as outlined in this document.
- ✓ Respect brand, trademark, copyright information and/or images including logo.
- ✓ Look to regularly update yourselves on the social guidelines and policies.
- ✓ Before entering any conversation, understand the context. Who are you speaking to? Is there a good reason for you to join the conversation? Listen before you join in.
- ✓ Always consider National Gas' principles and what this guidance means for you (as outlined above).

Don't:

- ✓ Don't create a company account and link it to a personal email address.
- ✓ Don't publish any content requiring a non-disclosure agreement or any company material (software, internal memos, or policy information with a 'Confidential' or 'Restricted' status) on social networking sites, without further approval from the Corporate Affairs team.
- ✓ Don't use inappropriate, sexist, discriminatory, or profane language.
- ✓ Don't post material that could put National Gas at a competitive disadvantage.
- ✓ Don't create a company account without speaking to the Corporate Affairs team first.
- ✓ Don't discuss competitors on social media channels unless you are doing so as an authorised representative of the company.
- ✓ Avoid publishing your contact details where they can be accessed and used widely by people that you did not intend to provide them to.
- ✓ Do not make fake blog or reviews for the company or competitors and do not pay others to do so.

Dilemma

Some of my colleagues are using Facebook to make derogatory comments about people on their team, both inside and outside working hours.

What should I do?

This is unacceptable. You should tell your line manager, the People team, or a member of the Ethics Team.

Some third parties online are spreading incorrect/false information about a National Gas lines or business/service online.

What should I do?

You should never get in arguments online to defend National Gas and instead raise the matter with the Corporate Affairs team.



FAQs	A couple of journalists contacted me after I placed a post on Twitter. Can I talk to them? No. Should you be approached by a journalist in any manner, you should inform Corporate Affairs which will deal with the enquiry on behalf of National Gas. Take the journalist's details and pass them on to the Corporate Affairs team, who will then decide the best course of action (corporateaffairs@nationalgas.com). What if a National Gas customer asks me a question via social media? You should seek advice from Corporate Affairs before responding via social media unless your role permits you to do so and you are able to correctly answer the question.
What this guidance means to you	Remember that anything posted on the internet is likely to be permanent, even if you delete it – the information could have been copied and reposted. You're accountable for anything that you post on social media platforms.
Policy Section Owner	Corporate Affairs

9. Our Code of Ethics and Ethical Decision Making

9.1 National Gas is committed to the highest standards of business integrity, and we expect all staff to maintain these high standards in accordance with our Code of Ethics. However, we recognise that things can go wrong from time to time, and an open and accountable culture is essential in order to properly address such situations when they occur and learn lessons to prevent them re-occurring. Our Code is supported by robust processes for investigating concerns raised and responding to related queries. Please refer to the contact information at the back of the Code for details of how to report ethical concerns or for further guidance on questions or queries.

9.2 The aims of this policy are:

- a. To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected.
- b. To provide staff with guidance as to how to raise those concerns.
- c. To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

9.3 This policy covers all employees, officers, consultants, contractors, casual workers and agency workers of National Gas.

What Can I Raise Concerns About?

9.4 We want members of staff to raise concerns about suspected wrongdoing at work. There are many potential activities that could be classed as wrongdoing in National Gas, from breaches of our internal policies to criminal activity. Some examples include:

- ☑ Theft or fraud
- ☑ Danger to health or safety
- ☑ Corrupt or dishonest activity
- ☑ Damage to the environment
- ☑ Abuse of authority
- ☑ Failure to comply with legal or regulatory requirements
- ☑ Covering up wrongdoing
- ☑ Abusive, derogatory or discriminatory behaviour towards others

How To Raise a Concern

9.5 You can raise concerns with your line manager, or you can contact the Ethics team directly via the mailbox: ethics@nationalgas.com. The Ethics team will acknowledge all concerns raised within one working day.

9.6 Concerns can also be raised via our external reporting service, See Hear Speak Up. Reports via this service can be made anonymously if you wish. You can use this service in any of the following ways:

- a. Complete an online form at: <https://fileaconcern.org/nationalgas>
- b. Call the freephone number: 0800 0260 488
- c. Email to: report@seehearspeakup.co.uk



Confidentiality

- 9.7** We hope that you will feel able to directly raise concerns about wrongdoing with our Ethics team. We will treat all concerns as confidential and will take all reasonable steps not to disclose your identity unless we have to, e.g. because of disciplinary or court proceedings.
- 9.8** You may wish to make a concern anonymously where you feel unable to raise the matter directly, and our external reporting channels allow for this. However, it will be much more difficult for us to look into anonymous reports effectively if we cannot obtain further information from you. Further, we cannot guarantee that the people involved in your concern will not be able to work out your identity once we start to investigate the matter, and if this is likely then raising the concern openly may be the best option.
- 9.9** We will make every effort to protect the identity of anyone raising, or involved with, an ethics concern or internal investigation. Where a Subject Access Request under data protection legislation is received we will prioritise maintaining confidentiality when responding.
- 9.10** All investigations data is collected, stored and processed in line with the Company's [privacy notice](#).

Protection And Support

- 9.11** It is understandable that staff raising concerns are sometimes worried about possible repercussions. We encourage speaking up and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.12** We will not tolerate retaliation or victimisation of any kind against anyone who raises a concern in good faith or provides information to an internal investigation, and any such acts will be treated as misconduct and subject to disciplinary procedures.
- 9.13** If you believe that you have suffered any such treatment as a consequence of raising a concern around wrongdoing, you should inform the Ethics team immediately.

What Happens After I Raise a Concern?

- 9.14** Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. Where required we will appoint an investigator and identify staff with specialist knowledge of the subject matter.
- 9.15** The investigator will then examine the issues, and this may involve speaking to you to obtain further information. Investigations are conducted on a “need to know” basis; your line manager and/or colleagues will not be informed unless there is a need to do so.
- 9.16** The investigation outcome may make recommendations for change to enable us to minimise the risk of future wrongdoing. In some cases, this may include a recommendation for disciplinary action.
- 9.17** If we conclude that the person raising the concern has made false allegations maliciously or with a view to personal gain, they may be subject to disciplinary action.
- 9.18** We cannot always guarantee the resolution that you may be seeking, but we will try to deal with your concern fairly and appropriately. All staff spoken to as part of an internal investigation are expected to treat the matter as confidential.
- 9.19** We will follow up a concern with the original reporter where possible.

Raising a Concern with External Bodies

- 9.20** We hope that this policy gives you the assurance that we have an appropriate internal mechanism for reporting and remedying any wrongdoing in the workplace. In most cases there should be no need for you to alert any external parties of your concern.
- 9.21** However, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or the police. If you feel that you need to report this externally then we suggest that Protect, an independent whistleblowing charity, may be able to advise you on your options (<https://protect-advice.org.uk>, 020 3117 2520).

Key Contacts

9.22 National Gas Ethics team: box.ethics@nationalgas.com

9.23 External reporting service, See Hear Speak Up:

- a. Online form at: <https://fileaconcern.org/nationalgas>
- b. 24/7 freephone number: 0800 0260 488
- c. Email: report@seehearspeakup.co.uk



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