

Group Public Interest Disclosure ('Speak Up') Policy

1. Purpose

To provide a procedure to enable you to raise your concerns should you have reasonable grounds to believe that an incident of work malpractice or mismanagement has occurred, is occurring, or is likely to occur within the Centrica Group.

2. Scope

All employees, agency staff, consultants and directly contracted persons employed within the Centrica Group in the UK and overseas operations.

3. Policy

We are committed to dealing responsibly, openly and professionally with any genuine concern employees may have about any practice, procedure or policy carried out by any officer or employee of the Company, which may be a breach of rules, irregularity, malpractice, a danger to our employees or our customers, financial malpractice, breach of legal obligations or may damage the environment.

We encourage employees and those working with the Company in any other capacity to raise their concerns about any incidents of malpractice in the workplace at the earliest possible stage. Our approach to 'Speak Up' is to enable staff to raise their concerns internally or externally to disclose information they believe shows malpractice or impropriety in the first instance.

This policy is non-contractual and can be subject to change or withdrawn at any time.

4. Malpractice

The Public Interest Disclosures Act 1998 encourages staff to raise their concerns internally about malpractice or impropriety, which may include:

- I. the commission, or likely commission, of a criminal offence; or
- II. a failure to comply with any legal or regulatory obligation; or
- III. a miscarriage of justice; or
- IV. endangering the health and safety of any individual; or
- V. damage to the environment; or
- VI. fraud or financial irregularity; or
- VII. blackmail, corruption or bribery; or
- VIII. deliberate concealment relating to any of I to VII;

It is immaterial whether the relevant failure occurred, occurs or would occur in the United Kingdom or elsewhere, and whether the law applying to it is that of the United Kingdom or of any other country or territory in which the Centrica Group operates or has facilities.

5. Making a Disclosure

It is our primary aim to prevent workplace malpractice from occurring in the first place. If it happens, it is our objective to prevent it from recurring. If appropriate, every effort will be made to resolve the situation promptly. If this is not possible, we will take further action to fully investigate and then take appropriate action.

Initial Report

If an employee has a concern about work place malpractice, they should initially discuss it with their Line Manager or HR Manager. He or she will attempt to resolve the matter as promptly as is reasonably practicable.

There may be circumstances where the employee feels unable to approach their Line Manager or HR Manager and in these circumstances they can raise concerns via external helplines or directly with one of the people designated Public Interest Disclosure Act (PIDA) Officers¹ for this purpose. They will either deal with the matter or nominate a management representative, as appropriate.

Alternatively, employees can raise concerns through one of the following confidential helplines:

Independent 'Speak Up' Helpline - This confidential helpline is run by Expolink², our third party providers to ensure that concerns about malpractice in the workplace are properly raised and addressed.

Employees or fixed term workers who work in an area of the Company regulated by the Financial Services Authority (F.S.A.), may also raise their concerns directly with the Director of Business Assurance, on a confidential basis, or with the F.S.A. on 020 7066 9200 or via e-mail: whistle@fsa.gov.uk. Further information is available at <http://www.fsa.gov.uk/Pages/Doing/Contact/Whistle/index.shtml>

The employee may remain anonymous if they wish but he or she is encouraged to provide their name and contact details to help facilitate the effectiveness of the subsequent investigation and to keep them up to date with progress.

Company Action

Following Investigation, if the concern raised is found to be valid, we may take one or more of the following steps (which is a non-exhaustive list):

- Refer the matter to the Centrica Executive Committee with a view to an internal investigation being carried out;
- Refer to a technical expert;
- Refer you to the grievance procedure;
- Refer the matter to the Board of Directors;
- Refer the matter to the appropriate external regulatory body for further investigation;

The employee will, unless exceptional circumstances do not permit, be informed of the resulting action, either directly or via Expolink. If the employee is dissatisfied with the way the disclosure has been dealt with they should raise their concern in writing to one of the PIDA Officers or by telephone to Expolink and their concerns will be investigated.

¹ Also known as "Authorised Recipients"

² With the exception of North America

External Disclosure

If, after having followed the procedural steps set out above, the employee remains genuinely and reasonably dissatisfied with the outcome, they may raise their concern, on a confidential basis with:

the relevant regulatory authority;

a member of parliament; or

a professionally qualified lawyer for the purposes of obtaining legal advice.

Confidentiality

Provided the employee raises any concerns in good faith and not out of malice or with a view to personal gain and they have reasonable grounds for believing their concerns to be true and they have complied in full with the spirit of the policy and procedural steps set out above, the following will apply:-

So far as possible the employee's identity, if known, will not be disclosed at any time by the Company unless necessary for the purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation.

Whilst every effort will be taken to ensure the employee's identity is not disclosed it may become necessary to identify them or become possible for third parties to deduce your identity. For this reason no guarantee of anonymity can be given.

The Company will take all reasonable steps to ensure the employee is not subjected to any harassment, victimisation or disciplinary action as a result of raising the action.

So far as possible any supporting evidence relating to the disclosure will be kept secure at all times.

Unfounded Allegations

If an employee makes an allegation in good faith that is not confirmed by subsequent investigation no action will be taken against them. However, malicious or unfounded allegations may result in disciplinary action.

6. Responsibility

All those persons referred to within the scope of this policy are required to be familiar with the terms of this policy.

Individual managers are responsible for ensuring that this policy is communicated and applied within their own area. Any queries on the application or interpretation of this policy must be discussed with the HR Policy Unit prior to any action being taken.