

The Modern Slavery Act

31 March 2022

Modern Slavery Act Transparency Statement

Northern Gas Networks Holdings Limited, Northern Gas Networks Limited, Northern Gas Networks Pension Trustee (UK) Limited, Northern Gas Networks Operations Limited and Northern Gas Networks Finance Plc (UK)

(together the “NGN Group”)

For the Financial Year 1 April 2021 to 31 March 2022

Background

Northern Gas Networks Limited (NGN) is the licensed gas transporter for the North of England region, delivering gas to 2.7 million homes and businesses in the North East, Northern Cumbria and most of Yorkshire through our network of 36,000km of gas mains. The NGN Group employs more than 1,100 employees across the region, with offices in Leeds, Sunderland and nine other operational depots.

NGN has a clear vision to be the best and to be recognised by the regulator Ofgem as being the top performing gas network for customer experience and efficiency and by the Health and Safety Executive for our safety performance. NGN and its owners are committed to supporting our business in its mission to provide a safe and reliable gas service, deliver excellent customer service and go for the extra miles for the communities we serve.

Anti-Slavery Commitment

The NGN Group and its owners are fully committed to ensuring that the group complies with all applicable legal requirements including without limitation the Modern Slavery Act 2015.

The NGN Group and its owners have a zero tolerance to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Supply chain and Procurement

The NGN Group’s suite of standard form contracts contain provisions which require suppliers to comply with the Modern Slavery Act 2015 and also provide the NGN Group with the right to audit suppliers’ compliance with this Act. Furthermore such contracts provide the NGN Group with the right to ultimately terminate the agreement if the supplier in question is found to have breached the Act.

The NGN Group’s internal procurement policy requires its staff to comply with the Act at all times when undertaking procurement events and engaging with the supply chain. In addition the NGN Group’s invitation to tender pre-qualification questionnaire requires prospective

suppliers to confirm their compliance with the Act as a prerequisite to selection as a potential supplier to the NGN Group.

Furthermore, the standard supplier selection questionnaire used by Achilles* requires suppliers to confirm compliance with the Modern Slavery Act 2015 as a prerequisite to registration as an approved supplier pursuant to the Achilles UVDB.

The NGN Group has also implemented a Supplier Code of Conduct which sets out key expectations and requirements, including compliance with the Modern Slavery Act 2015. Prospective suppliers are required to provide a Modern Slavery Policy and for suppliers with an annual turnover of £36m or more this is a mandatory requirement for trading with the NGN Group. Potential suppliers are required to sign a compliance certificate. Where limitations are identified, suppliers are required to take corrective actions. The Code prompts suppliers to cascade compliance requirements to their own supply chains to drive improvement.

Additionally, the NGN Group will be providing free training materials and resources relating to Modern Slavery to suppliers via the Supply Chain Sustainability School. The platform allows the creation of specific supplier learning and development pathways to enable us to upskill and educate our supply chain on Modern Slavery issues.

*Achilles is the operator of the Achilles UVDB (Utilities Vendor Database), which is used by the NGN Group and other utilities as an approved qualification system for the purpose of undertaking qualifying procurement events in compliance with The Utilities Contracts Regulations 2016.

Human Resources

All new and existing employees are subject to prescribed right to work checks so as to ensure that the NGN Group does not employ illegal workers thereby ensuring compliance with the Immigration, Asylum and Nationality Act 2006.

The NGN Group operates an Anti-Slavery Policy that reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In addition the NGN Group operates an employee code of conduct which requires its employees amongst other things to uphold the NGN Group's high standards of business integrity, honesty and transparency in all its business dealings. Employees are required to immediately report any possible breach of the code of conduct to their relevant line manager, Human Resources or a member of NGN's Senior Management Team or via NGN's confidential whistleblowing line.

Furthermore we work with our recognised trade unions and workers' representatives to monitor employee wellbeing and working conditions and discuss and resolve any issues that may arise.

Statement

This statement is made by the NGN Group pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the NGN Group's slavery and human trafficking statement for the financial year 1 April 2021 to 31 March 2022.

Name: Mark Horsley

Position: Chief Executive Officer, Northern Gas Networks

Signature: 

Date: 28 April 2022