



# Modern Slavery Statement

## NGN Group

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 1st April 2024 - 31st March 2025



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# Message from the Chief Executive



**As a business with 1,100 colleagues serving communities across the North of England, Northern Gas Networks (NGN) is committed to upholding the highest ethical standards within our organisation and throughout our supply chains.**

Modern slavery is a violation of fundamental human rights and has no place in our operations or those of our partners.

This statement outlines our commitment to preventing modern slavery and sets out how we actively work to identify and address risks by fostering transparency, conducting due diligence, and collaborating with our supply chains.

This financial year we continued our focus on education – supporting our supply chains through our Supply Chain Sustainability School, improving our sub-suppliers right to work checks, as well as reviewing and strengthening our own policies and procedures.

Combatting modern slavery is an ongoing responsibility, and we remain committed to preventing, detecting and addressing potential risks to ensure fair and safe working conditions for everyone connected to our business.

A handwritten signature in black ink, which appears to read 'Mark Horsley'.

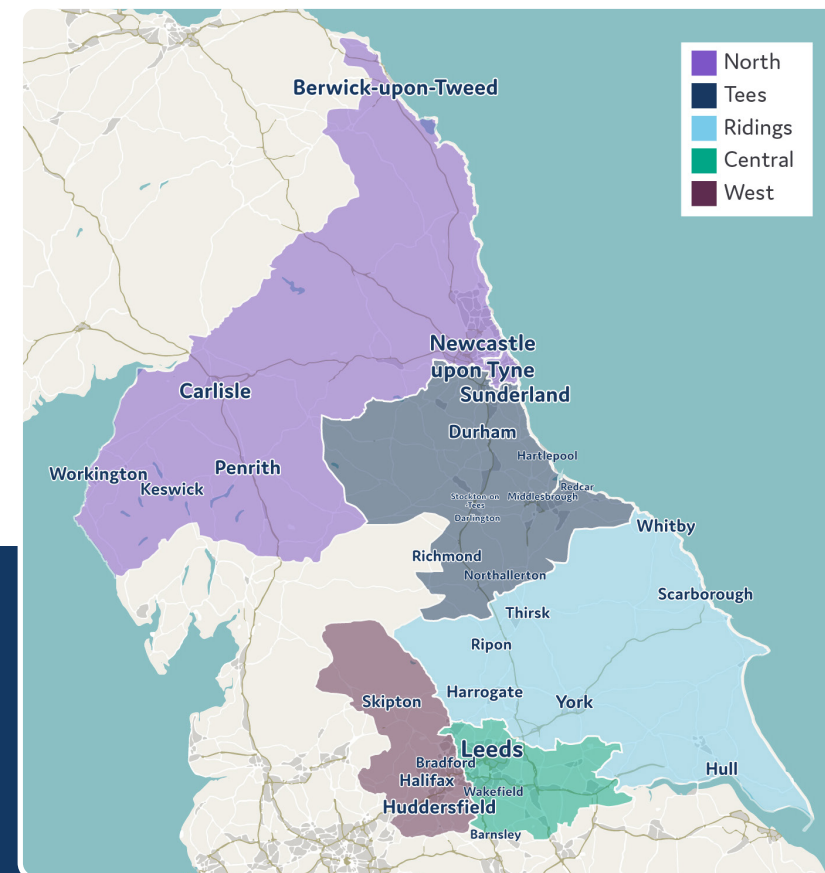
**Mark Horsley**  
Chief Executive Officer  
Northern Gas Networks

# Our Business

**Northern Gas Networks Limited ('NGN') is the licensed gas transporter for the North of England region, delivering gas to 2.9 million homes and businesses in the North East, Northern Cumbria and most of Yorkshire through our network of 37,000km 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's vision is for a fairer, greener future for the North of England. We aspire to be recognised by our regulator Ofgem as the top performing gas distribution network for customer experience and efficiency and by the Health and Safety Executive for our safety performance. NGN and its owners are wholly committed to supporting the business in its mission to provide a safe and reliable gas service, deliver excellent customer service and go the extra mile for the communities we serve.

NGN Region



# Our 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.

To date, we have not identified any modern slavery within the NGN Group.



# Our Supply Chain

## We have various processes in place to prevent modern slavery occurring within our supply chain. These include:

Our 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 a 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 state if they have ever been convicted for breach of the Modern Slavery Act as a prerequisite to selection as a potential supplier to the NGN Group. We are in the process of implementing additional checks for the supplier's own supply chain.

Furthermore, the standard supplier selection pre-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 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 continue to provide 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.



# 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.

NGN has an agreement in place with Safecall, who are an external, independent, company that enables colleagues to contact them with any concerns they may have. There are no restrictions as to what they can raise and all matters are investigated. This has been successfully implemented into our processes and will be a valuable asset to us.

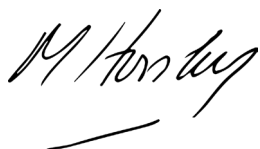
Through our work with our Policy Review Group we continually monitor policies and procedures to ensure they not only align with legislation but also best practice. Colleagues from all areas of the business are represented at this group.

Our colleagues responsible for right to work checks are all properly trained, we ensure all colleagues in need of work visas are fully vetted and compliant with our licence obligations.

We remain committed to ensure that all colleagues directly employed by NGN are paid at least the real living wage regardless of their role in the organisation.

# 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 2023 to 31 March 2024.



**Mark Horsley**

Chief Executive Officer  
Northern Gas Networks

**Date: September 2025**