

SPEAK UP

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What is Speak Up?

What is Speak Up?

Speak Up is the process whereby you can seek advice or raise a concern relating to possible improper, unethical or illegal practice and/or conduct within Centrica including potential or actual breaches of Our Code.

How do I Speak Up?

In the first instance, we encourage you to talk to line management. However, if you are not comfortable or it is impractical or inappropriate to do so, you can contact a member of the Human Resources department, the Legal department, Internal Audit, the Ethics & Compliance team or the Speak Up team. You can also ask a question or raise your concerns through our Speak Up helpline.

Do you feel comfortable approaching your line manager?

YES

Discuss your question or raise your concern with your line manager

NO

Do you feel comfortable approaching another manager in your team?

YES

Discuss your question or raise your concern with the manager

NO

Do you feel comfortable approaching someone in a function that supports you?

YES

Discuss your question or raise your concern with HR, Legal, Ethics & Compliance, or Audit, or send an email to speakup@centrica.com

NO

Contact the Centrica Speak Up helpline

Can I raise a concern via the Internet or the telephone?

Yes, the Speak Up helpline offers both options.

Who can Speak Up?

Everyone in Centrica and affiliated companies including all subsidiaries and joint ventures are encouraged to Speak Up. This includes all employees, whether full time, part time, contract or temporary to Independent contractors, vendors, consultants, suppliers and other business partners who are working on our behalf or in our name through outsourcing of services, processes or any other business activity.

Why should I raise a concern?

At Centrica, we are committed to conducting business with fairness, integrity and respect for the law, our regulatory obligations and our values. It's very important to us that you Speak Up as it enables us to safeguard our reputation, success and ability to operate.

Does Centrica really want me to raise a concern if I witness a breach of Our Code?

Centrica actively promotes employees to do the right thing. We encourage you to raise concerns and ask questions. By doing so, you give Centrica an opportunity to deal with the concern.

Can I remain anonymous when I Speak Up?

You can raise your concerns anonymously (where permitted by local legislation). However, we may encourage you to reveal your identity as it can be more difficult, and in some circumstances even impossible, for us to investigate concerns that are raised anonymously.

If I raise a concern, will it be confidential?

Yes, the company will not disclose your identity unless it's reasonably necessary to do so for purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation. Your personal data will only be disclosed to need-to-know employees and/or third parties (consultants, authorities etc.).

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The Speak Up helpline

What is the Centrica Speak Up helpline?

The Centrica Speak Up helpline is a comprehensive and confidential reporting tool to assist Centrica employees, vendors, suppliers and business partners to raise concerns relating to improper, unethical or illegal practice and/or conduct, or seek guidance regarding Our Code, or our other policies or applicable regulations and laws.

The Speak Up helpline is designed for users to ask questions or raise any concerns relating to possible improper, unethical or illegal practice and/or conduct within the organisation, including potential or actual breaches of Our Code.

Why do we need a Speak Up helpline?

By having more open channels of communication, Centrica is demonstrating that we value the help of employees who raise concerns and contribute to sustaining our reputation, success and ability to operate – both now and in the future.

The Speak Up helpline allows for an effective reporting system which will aid in our efforts to foster a culture of integrity and ethical decision-making.

The Speak Up helpline also offers an effective way for employees who raise concerns to maintain their anonymity.

Who are Navex Global?

NAVEX Global is an independent third party service provider that has been retained by Centrica to administer the Centrica Speak Up helpline and case management system.

What is EthicsPoint?

EthicsPoint is the name of the comprehensive and confidential internet and telephone based reporting tool provided by Navex Global.

If I use the Speak Up helpline to raise a concern, where does it go?

Concerns raised are entered directly into NAVEX Global's secure server to prevent any possible breach in security.

Who can access the concern once its raised via the helpline?

Concerns raised are made available by NAVEX Global only to a very limited number of specific individuals, mainly within the Ethics & Compliance teams, within Centrica who are entrusted with evaluating the reports, based on the type of reported concern and location of the incident. Each of these report recipients has had training in keeping these reports confidential to the fullest extent practicable under the circumstances.

Can I raise a concern via the helpline if I don't have access to the internet?

You can raise a concern via the Speak Up helpline from any computer that can access the Internet.

If you do not have access to, or are uncomfortable using a computer, you can call the Speak Up helpline which is available 24 hours a day, 365 days a year. At the moment, this service is only available from the UK, North America, Canada and Ireland. We will be expanding the helpline availability in 2018.

International dialling options are available, by country, on the website.

Is the system just an example of someone watching over me?

The NAVEX Global system is a tool utilised by Centrica to maintain a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, and communicate any potential concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

Centrica has carefully chosen this reporting tool to meet our reporting requirements.

Can I raise a concern from home and remain anonymous online?

Yes. The NAVEX Global system is designed to protect your anonymity. In fact, NAVEX is contractually committed not to pursue your identity. To further ensure your anonymity, you may - as a reporting party – not reveal any identifying details when raising your concern.

No matter where a report is generated if raised anonymously it will remain protected, anonymous and, to the extent possible, confidential. An internet portal never identifies you by screen name and the NAVEX Global system strips away identifying information, such as an IP address, so that anonymity is maintained. Plus, NAVEX Global is contractually committed not to pursue your identity.

Please be aware that anonymity may not be permitted in some countries due to local law.

It is my understanding that any concern I send from a company computer generates a server log that shows every website my PC connects with; won't this log identify me as a report originator?

NAVEX Global does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX Global is available when you access the Centrica Speak Up helpline. In fact, NAVEX Global is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside of the work environment through the NAVEX Global secure website. Many people choose this option.

Can I raise a concern from home and remain anonymous over the phone?

Yes. You will be asked to provide the same information that would be provided in an internet-based report. The representative will type your responses directly into NAVEX Global's secure environment. The Speak Up helpline telephone-based reports have the same security and confidentiality measures applied to them during delivery as Internet-based reports.

Please be aware that anonymity may not be permitted in some countries due to local law.

What if my boss or other managers are involved in the concern? Will they see that I have raised a concern?

The NAVEX Global system and report distribution protocols are designed so implicated parties are not notified about or granted access to reports in which they have been named, unless required by local laws.

What if I remember something important about the incident after I raise the concern via the helpline?

When you raise a concern via the Centrica Speak Up helpline either using the web portal or through NAVEX Global's telephony, you receive a unique report key and are asked to select a password. With the report key and your password, you can return to the NAVEX Global system again, either by internet or telephone, and access the original report. At that point, you can add more details.

What if you have questions for me relating to the concern I raised online or over the telephone?

NAVEX Global provides functionality that enables the Speak Up team to post questions for you, even if you raise a concern anonymously. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed (7 days). When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such dialogue aids in investigating matters.

Are these follow-ups on concerns as secure as the first one?

All NAVEX Global correspondences are held in the same strict confidence as the initial concern, continuing under the umbrella of anonymity, if you so choose, to the extent permitted by local law and local company mandate.

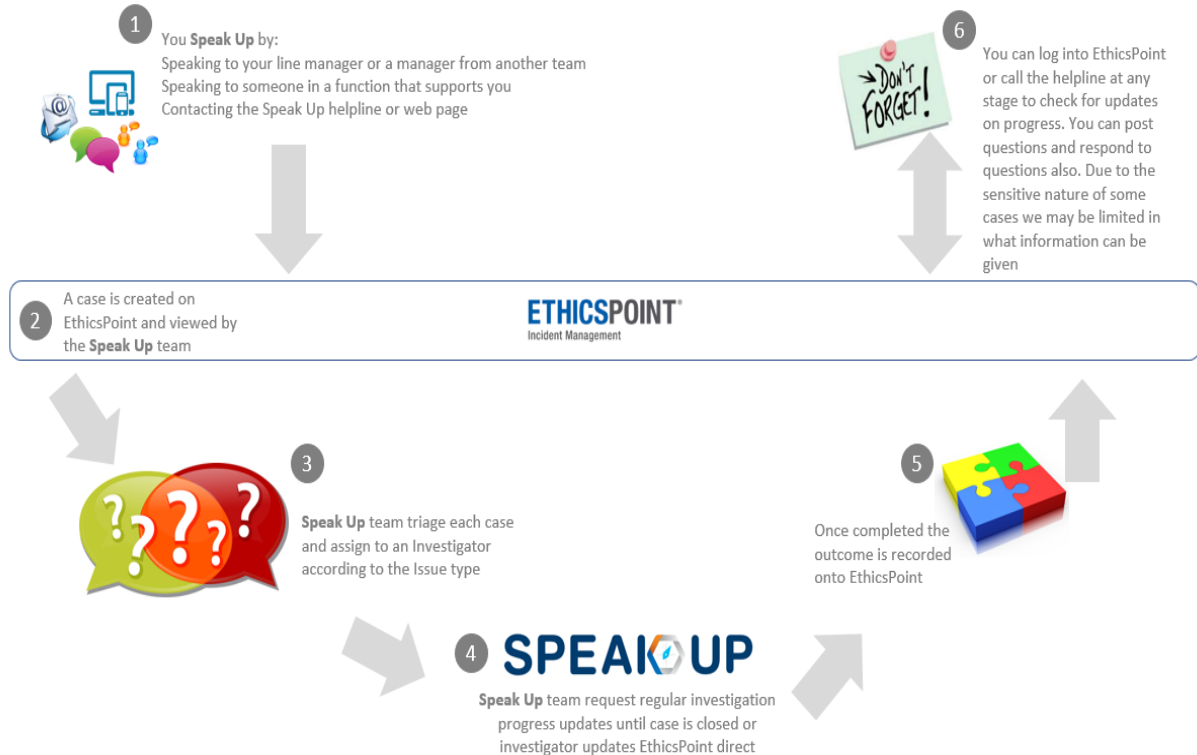
What if I lose my report key or password?

To maintain the highest level of confidentiality, you will be asked to raise a new concern if you lose either your report key or your password. You should mention that your new concern relates to one raised earlier.

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The Speak Up process

What happens when I Speak Up?



Does it help if I identify myself when I raise a concern?

Investigating a concern is usually faster and more successful when the Centrica Speak Up team can follow up on the issue directly with the person raising the concern.

If you have identified yourself, reasonable efforts will be made to respect your confidentiality. Your identity will not be disclosed unless necessary for carrying out a proper investigation, required in the course of legal proceedings, or as required by local regulations or laws.

Centrica operates a zero tolerance policy on retaliation and will not tolerate any form of retaliation when a concern is raised in good faith.

What happens after I raise a concern?

Concerns raised will be assessed. If deemed appropriate, the concern will be escalated to the Speak Up team or relevant department. In any event the concern will be investigated with remedial action taken (if necessary).

How can I monitor the progress of my concern via the helpline if I choose to remain anonymous?

Once you have raised your concern via the helpline, you will be provided with a report key and asked to create a password. With these two pieces of identification, you will be able to follow up on a concern, either by visiting the Centrica Speak Up portal or by contacting the telephone helpline.

You may need to wait a few days after your submission before you can monitor progress and check whether you are being asked for any additional information. To allow for protection of the matter and any parties involved, details of the case cannot be provided.

What happens if a false or malicious concern is raised?

Malicious allegations, or allegations made for personal gain, may result in disciplinary action. If you raise your concern in good faith and the subsequent investigation concluded that there was no wrongdoing, no action will be taken against you.

Centrica operates a zero tolerance policy on retaliation and will not tolerate any form of retaliation when a concern is raised in good faith.

What happens if my concern is in respect of a breach of regulations?

All concerns that require escalation to a regulator will be sent to the appropriate external regulatory body for further investigation. You are also able to raise your concerns directly to a regulator.

Can I raise a concern directly to a regulator?

At Centrica, we encourage you in the first instance to raise your concerns internally, however you may disclose concerns to the regulator directly should you wish to do so. It is also possible to raise concerns with both Centrica and the regulator at the same time.

Centrica have a zero tolerance policy on retaliation, what does this mean?

We do not tolerate employees preventing others from raising concerns or victimising others for raising concerns. We deem such actions as retaliation and consider any form of retaliation against those who raise concerns, a breach of Our Code as gross misconduct. This could lead to disciplinary action up to and including termination of employment.

My manager has retaliated against me as a result of a concern I raised, what should I do?

If you are a victim or witness to any form of retaliation, this should be raised with line management, Human Resources, or the Speak Up team immediately. Alternatively, you can contact the Speak Up helpline.

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