

centrica

Supplier Code of Conduct

Final Version 2.0



Operate Safely, Securely and Responsibly

Centrica is committed to working with suppliers who uphold the highest standards of integrity, safety, and environmental responsibility.

Suppliers are expected to operate in a manner that protects people, communities, and the planet, and to comply with all applicable laws and regulations.



Health, Safety and Environmental Responsibility

Suppliers must ensure a safe, healthy, and environmentally responsible workplace for employees, contractors, and visitors. They are required to implement robust Health, Safety, and Environmental (HSE) management systems that comply with legislation and proactively manage risks. Expectations include:

- Formal HSE policy with board-level accountability.
- Identification and minimisation of environmental impacts through responsible resource use, pollution prevention, waste management, and the protection of nature.
- Competency development and training programmes.
- Setting and reviewing performance targets aligned to material risks and impacts.
- Regular measurement, reporting, and continuous improvement of HSE performance.

Environmental Management

Suppliers shall have in place or be working towards an environmental management system that is aligned with the requirements of ISO14001, the international standard for environmental management systems or other suitably recognised standards. Where appropriate the system shall be independently certified. Upon request, suppliers will share copies of the relevant certificates and their environmental policy documents with Centrica.

Ethical Sourcing and Critical Minerals

Suppliers must take reasonable steps to ensure all materials, including Critical Minerals, are sourced ethically, responsibly, and in compliance with applicable laws. Robust supply chain due diligence is required to prevent the use of critical minerals linked to armed conflict or human rights abuses. On request, suppliers must provide evidence of compliance. The UK Government's full list of Critical Minerals (Critical Minerals technical annex - GOV.UK)

Climate Targets and Carbon Reduction

Centrica encourages suppliers to support global efforts to combat climate change. Suppliers should have strategies in place to reduce greenhouse gas (GHG) emissions, improve energy efficiency, and contribute to Centrica's net zero ambitions. Where the annual contract value exceeds £5m, suppliers shall share their Carbon Reduction Plan with Centrica within three months of the contract being awarded. In addition, upon request suppliers will share environmental data, such as carbon emissions, waste, water and energy use so as to enable Centrica to track compliance with our targets.

Quality Assurance and Performance

Suppliers must maintain ISO9001-aligned QMS/IMS and meet all agreed design and performance requirements. They must take prompt corrective action when standards are not met and use recognised project management methodologies such as PRINCE2, Lean or APM. Centrica may request evidence of manufacturing practices, staff training, and related protocols throughout the contract lifecycle.

Products and packaging

Suppliers must comply with all applicable laws, regulations, and Centrica requirements on Producer Responsibility, including restrictions on certain substances and labelling for recycling and disposal. Upon request, suppliers shall provide required information on electrical and electronic equipment, batteries and packaging to support Centrica's compliance and reporting obligations.

Regulatory Compliance

Suppliers must comply with all applicable laws, regulations, permits, licenses, insurance, consents and reporting requirements. Any material changes to their business that could impact regulatory compliance must be disclosed to Centrica without delay.

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Conduct Business with
Integrity

Value Our People

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Fairly

Protect our Assets,
Information and Interests

Work Responsibly with
Communities and
Governments

Speak Up

*Contractors

(to be read in conjunction with the remainder of this Code of Conduct)

Operate Safely, Securely and Responsibly

Centrica is committed to partnering with contractors who share our dedication to operating with integrity, safeguarding people, and protecting the environment. As part of this commitment, we expect all contractors to uphold robust standards of health, safety, environmental stewardship, and ethical conduct.



Selection and Pre-qualification

Centrica partners only with contractors who uphold strong standards of integrity, safety and environmental responsibility. Contractors must protect people, communities and the planet, comply with all relevant laws and regulations, and operate in a safe, ethical and secure manner at all times.

Formal contracts detailing HSE requirements are established for all contractors.

Contractors shall notify Centrica immediately should the work deviates from the agreed scope at onboarding.

Contractors who are categorised into Category 1 (CAT1) and Category 2 (CAT2):

- CAT1 contractors receive comprehensive induction, tools, and equipment from Centrica, and are fully managed by the business.

- CAT2 contractors must meet Centrica's standards and provide verification of compliance. They are required to complete pre-qualification questionnaires and provide evidence of relevant training and certifications.

Management and Monitoring

- Regular reviews, including Monthly Business Reviews (MBR) and Quarterly Business Reviews (QBR), are conducted to monitor contractor performance against agreed Key Performance Indicators (KPIs).

- Effective communication is maintained throughout the contract period, and all HSE events are reported through the appropriate reporting system.

Subcontractor Oversight

Contractors must obtain Centrica approval before subcontracting any work.

- Ensure subcontractors meet all competency requirements onsite, safety, and compliance requirements.

- Remain fully accountable for subcontractor behaviour and performance.

Site Access & Security Requirements

Contractors must operate safely, responsibly, and professionally while onsite. Failure to follow these onsite requirements may result in removal from site, contract review, or termination.

- Comply with all site access controls, including sign in procedures and identity checks.

- Wear visible identification at all times.

- Follow all instructions from Centrica site managers and security personnel.

Only access authorised areas and never allow unauthorised individuals onto the site.

Contractors shall:

- Wear mandatory PPE as defined by the site-specific rules (e.g., hard hats, hi vis, protective footwear, eye protection).

- Ensure specialist PPE (e.g., arc flash, respiratory protection) is used when required.

- Maintain PPE in good condition and replace when damaged or expired.

- Complete all required site HSE inductions before starting work.

- Conduct dynamic risk assessments and comply with site safety management systems.

- Follow safe systems of work, including permits to work where applicable.

- Immediately report incidents, near misses, hazards, or unsafe conditions.

- Use only safe, certified, and well-maintained tools and equipment.

- Ensure vehicles are road worthy and comply with all onsite traffic rules.

- Store equipment safely and avoid leaving unsecured items in operational areas.

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Conduct Business with Integrity

Centrica is committed to ethical business practices and expects its suppliers to uphold the same high standards.

Suppliers must conduct their operations with honesty, transparency, and accountability, ensuring compliance with all applicable laws and regulations.



Regulatory Compliance

Suppliers must comply with all applicable local, national, and international laws, regulations, anti-money laundering and industry standards, including sanctions. They must maintain all required licenses, permits, insurances and authorisations, and promptly notify Centrica of any changes affecting their regulatory status or ability to deliver contracted services.

Business Ethics and Anti-Fraud

Suppliers must operate with integrity, implementing robust controls to prevent, detect, and address and report any serious fraud to relevant authorities. This includes accurate record-keeping, thorough third-party due diligence, and ensuring all transactions are fair, transparent, and lawful. Suppliers are also expected to meet agreed payment terms and conditions, supporting positive social and environmental impacts.

Anti-Bribery and Corruption

Suppliers must maintain comprehensive anti-bribery and corruption (ABC) policies (and associated employee training) that apply across their organisation, including subsidiaries, and govern interactions with government and public officials. These policies must prohibit all forms of bribery, including kickbacks and facilitation payments; with stipulations to not use gifts or donations, politically or otherwise to gain an improper advantage.

Suppliers may not lobby government officials on Centrica's behalf unless explicitly engaged for that purpose.

Conflicts of Interest

Suppliers must avoid any actual or potential conflicts of interest involving other business relationships or personal interests related to the Centrica engagement. Any potential conflicts must be disclosed to Centrica promptly.

Gifts, Hospitality, and Donations

Suppliers must not offer gifts, hospitality, or donations to Centrica employees, contractors, or stakeholders that could influence or appear to influence business decisions. Any gestures must be modest, infrequent, and compliant with Centrica's policies; excessive or inappropriate offerings are prohibited. No gifts or hospitality may be offered during the supplier selection process prior to contract award.

Data Protection and Confidentiality

Suppliers must protect all personal and confidential information provided by Centrica, complying with all applicable data protection laws, which include respecting individuals' rights and international transfer requirements. Data must be collected, stored, processed, shared and deleted securely and lawfully. Suppliers must ensure staff are trained in data protection and confidentiality and promptly notify and assist Centrica in the event of a personal data breach.

Responsible Use of Social Media

Suppliers must use social media responsibly, ensuring Centrica's reputation and confidentiality are protected. Any public reference to Centrica must be accurate, respectful, and authorised where appropriate. Content that is misleading, offensive, or harmful to Centrica or its stakeholders is strictly prohibited.

Financial records related to transactions with Centrica

Suppliers must provide Centrica on request with evidence of compliance with anti-fraud, anti-money laundering (AML), anti-bribery and corruption (ABC), and sanctions obligations, which may include information regarding third-party relationships and associated payments.

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Centrica believes that people are at the heart of responsible business.

We expect our suppliers to treat all individuals with dignity and respect, promote wellbeing, and advance fundamental human rights across their operations and supply chains.



Human Rights and Labour Standards

Suppliers must uphold internationally recognised human rights and comply with all applicable laws, including the Modern Slavery Act 2015 or local equivalents. Key requirements include:

•**Human Rights Commitment:** Maintain a policy aligned with the fundamental principles and rights at work set out by international standards such as with UN Guiding Principles, UN Global Compact, and ILO standards, covering direct and indirect operations.

•**Prohibition of Exploitation:** No forced, compulsory, involuntary, or child labour. No corporal punishment, or abusive practices.

•**Freedom and Equality:** Ensure freedom from discrimination and enable freedom of association and collective bargaining or equivalent representation.

•**Safe Working Conditions:** Provide a healthy, hazard-free workplace and acceptable living conditions where applicable.

•**Respect and Dignity:** Uphold fundamental rights, including liberty, freedom of expression, and the right to work and education.

Fair Employment Practices

Suppliers must provide fair and lawful employment terms, including wages, working hours*, and benefits. Centrica requires payment to be fair and at a minimum, aligned to at least the legal minimum or prevailing industry wage. We require our UK-based suppliers to pay Real Living Wage rates. www.livingwage.org.uk.

Centrica require suppliers / contractors to facilitate confidential/anonymous complaints or whistleblowing and have a zero-tolerance approach to retaliation. Further support is offered by Centrica's Speak Up confidential helpline.

*Working Hours

Ensure compliance with national laws and collective agreements on working hours: standard hours must not exceed 48 per week, excluding overtime. Overtime should be voluntary and capped at 60 hours per week, except in exceptional circumstances permitted by law and collective agreements, with safeguards to protect worker health and safety.

Health, Safety and Wellbeing

Suppliers must provide a safe and healthy working environment for all personnel. This includes implementing effective health and safety policies, conducting regular risk assessments, and promoting physical and mental wellbeing. Suppliers must foster a culture of care, inclusion, psychological safety and measures to prevent drug and alcohol misuse.

Responsible Subcontracting

Suppliers must ensure that any subcontractors or third-party personnel engaged in delivering services to Centrica meet the same standards outlined in this Code. Subcontracting must not occur without Centrica's prior written consent, and suppliers remain accountable for the conduct and performance of their subcontractors.

Diversity, Equity and Inclusion

Suppliers are expected to promote diversity, equity, and inclusion in their workforce. Discrimination based on race, gender, age, disability, sexual orientation, religion, or any other protected characteristic is strictly prohibited. Inclusive hiring and development practices should be actively strengthened with specific attention to support groups that might be under-represented including but not limited to women, ethnic minorities, LGBTQ+ and those with disabilities.

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Treat Our Customers Fairly

Centrica is unequivocally committed to delivering outcomes that are fair, transparent, and respectful for all customers.

This commitment underpins every aspect of how we design, deliver, and support our products and services.



Acting in the Best Interests of Customers

We expect all suppliers, partners, and contractors acting on behalf of, or in association with, Centrica to uphold these principles consistently and without exception. Supplier behaviour must always reflect the high standards of care, integrity, and accountability expected of Centrica, particularly where actions or decisions may directly or indirectly impact our customers.

Suppliers must always act in the best interests of Centrica's customers. This obligation takes precedence over commercial, operational, or performance considerations and applies to all customer interactions, decisions, and outcomes.

Suppliers must:

- Take reasonable steps to identify vulnerability and respond with appropriate care, flexibility, and support.
- Ensure customers are treated with dignity, empathy, and respect always
- Customers must never be disadvantaged by supplier behaviour, process design, or commercial incentives.

Customer-Centric Conduct

Products, services, and interactions must be delivered with integrity, professionalism, and care. Communications must be clear, accurate, accessible, and not misleading, enabling customers to make informed decisions with confidence. Suppliers must ensure that information is presented in a way customers can reasonably understand, and must not resort to complexity, omission, or technical language to the customer's detriment.

Ethical Sales and Marketing

All sales, marketing, and customer engagement activities must be ethical, respectful, and fully compliant with applicable laws, regulations, industry codes, and Centrica policies. High pressure tactics, misrepresentation, omission of key information, or any exploitation (particularly of vulnerable customers) are strictly prohibited. Incentives or commercial pressures must never compromise fair customer outcomes.

Complaint Handling and Resolution

Suppliers must maintain robust, accessible, and effective processes for handling customer complaints, concerns, and feedback. Complaints must be addressed promptly, fairly, and transparently, with clear communication throughout the process. Suppliers are expected to use complaints and feedback as a source of insight to drive continuous improvement, prevent issue recurrence, and enhance customer outcomes. Systemic issues must be addressed through corrective action and shared learning with Centrica.

Transparency and Accountability

Suppliers must be fully transparent about pricing, fees, terms, conditions, and service limitations. Any practices that could confuse, mislead, pressure, or disadvantage customers are unacceptable. Suppliers must identify and promptly escalate any issues, risks, or failures that could impact customer outcomes, and take ownership of those within their control. They are expected to work collaboratively with Centrica to deliver timely and effective resolutions.

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Protect our Assets, Information and Interests

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Protect Our Assets, Information and Interest

Centrica expects its suppliers to safeguard the confidentiality integrity, and availability of all services and data entrusted to them. This includes digital infrastructure, operational technology, physical assets, intellectual property and data.

Suppliers must operate with integrity and responsibility to protect Centrica's interests and reputation.



Information Security

Suppliers must implement and maintain robust security risk management and controls to protect against cyber threats, unauthorised access, data breaches, malware and insider threats, aligned to recognised Information Security Management Systems such as ISO27001.

Suppliers need a minimum of Cyber Essentials. When requested, suppliers will maintain their compliance evidence via Centrica's Third-Party Management service, Risk Ledger.

Suppliers should adhere to guidance as issued by the UK National Cyber Security Centre (NCSC). This includes incident notification to the relevant authorities and notification within 72 hours for any event affecting Centrica services, data or significant event impacting the supplier.

The supplier will agree to Centrica's right to audit and where appropriate, additional compliance requirements such as SOC reports, external assessments, penetration testing and Key Risk Indicators (KRI).

Suppliers will ensure staff involved in providing services to Centrica receive at least annual Information Security and Data awareness training. In-addition, for suppliers with access to Centrica services and data, completion of Centrica specific awareness training will be required.

Those suppliers involved in Operational Technology (OT) need to comply with IEC 62443.

Contractual, Financial and Legal Integrity

Suppliers must promptly notify Centrica of any i) actual, suspected, or potential issue that could impact their financial integrity, ii) changes that affect their legal or contractual entity (such as mergers, acquisitions, or name changes) iii) inability to meet their contractual obligations iv) suppliers must comply with all filing requirements in their country of origin..

Responsible Use of Artificial Intelligence (AI)

Where AI technologies are used in the delivery of goods or services to Centrica, suppliers must ensure transparency in how AI systems operate and make decisions. Ethical use of AI that avoids bias, discrimination, or harm. Compliance with applicable laws, standards, and Centrica's AI governance policies. Human oversight of AI-driven processes where decisions may impact individuals or business outcomes

Suppliers must not use AI in ways that compromise data privacy, security, or customer trust.

Suppliers will not use or introduce AI to Centrica services without explicit prior approval from Centrica.

Business Continuity and Disaster Recovery

Suppliers shall maintain a documented, regularly updated and tested Business Continuity Plan (BCP) that addresses potential disruptions to operations, inclusive of supply chain disruptions, as identified through business impact analysis, recovery strategies and communication protocols.

Where applicable, suppliers must have a Disaster Recovery Plan (DRP) for critical services and data, including backup procedures, data retention periods and restoration timelines.

Suppliers are expected to assess and manage risks within their own supply chains, including identifying critical dependencies and implementing mitigation strategies such as dual sourcing, back up supplies, or geographic diversification.

Suppliers must maintain and provide evidence of testing and improvement plans (BCP & DRP).

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Work Responsibly with Communities and Governments

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Work responsibly with our communities and governments

Centrica aims to be a trusted company and a modern energy and services provider.

We understand that society gives us the right to operate, so building strong relationships with governments, partnering with local communities to reduce our environmental impact is essential for long-term success.



Community Responsibility

Suppliers must actively manage their social and economic impact on local communities.

This includes:

- Maintaining a clear commitment on community engagement and impact management
- Conducting impact assessments at appropriate times and locations
- Allowing relevant stakeholders to participate in assessments
- Making assessment results accessible in a transparent manner
- Collaborating with local communities to deliver positive contributions.

Political Neutrality and Engagement

Centrica, its suppliers and contractors must operate with strict political neutrality, refraining from political contributions or activities when representing or acting on behalf of Centrica.

Business Ethics

At Centrica, we are committed to conducting business with integrity, transparency, and respect for the law. These principles are fundamental to how we operate and extend to everyone we work with, including employees, suppliers, contractors, and subcontractors.

This Third-Party Code of Conduct applies to Centrica's global operations. While it outlines universal standards, you must also comply with all relevant local laws and any specific policies referenced throughout if your work spans multiple jurisdictions.

We expect you to report any unethical or unlawful behaviour, or breaches of this Code, without delay to your primary contact at Centrica.

All concerns raised by a supplier, contractor or subcontractors employees will be reviewed thoroughly, fairly, and promptly. We do not tolerate any form of retaliation or victimisation against individuals who raise concerns in good faith. To further support this, Centrica provides a confidential Speak Up reporting mechanism, detailed at the end of this document.

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Concerns can be raised by telephoning the Speak Up helpline on the toll-free numbers listed, or via the Speak Up web Portal



It's Confidential

The Speak Up confidential helpline is an online and telephone reporting channel hosted by a third-party supplier (Navex Global) available 24 hours a day, 365 days a year.

Calls made through Speak Up are not recorded.

Concerns raised via Speak Up are confidential, with the ability to raise anonymously. Cases are reviewed by an independent team who decide how, and who, should investigate. Following investigation, appropriate action will be taken to address the issue.

The person raising the concern will be kept updated throughout, using communications through the Speak Up tool, where the ability to review the progress is provided.

Speak Up Telephone Numbers:

UK: 0808 234 6300

Ireland: 1-800-550-000
Enter 855-282-4792 when prompted

Denmark: 80 83 02 84
English/Danish speakers available

USA: 1-855-282-4792 English/Spanish speakers available

Speak Up Web Portal:

Concerns can also be raised online through our portal: www.centrica.ethicspoint.com

Alternatively, reports can be sent to the Speak Up mailbox: speakup@centrica.com

Who can Speak Up

Everyone in Centrica can and its affiliated companies, including all subsidiaries and joint ventures, are encouraged and able to use the Speak Up facility. This includes all employees, whether full-time, part-time, contract or temporary, independent contractors, consultants, suppliers, and other business partners who are working on our behalf, or in our name.

Reporting Bullying and Harassment

Sexual harassment, bullying and harassment of any kind; including unwanted sexual conduct, abusive behaviour, intimidation, humiliation, offensive comments, or physical behaviour that creates an intimidating, hostile or degrading environment are strictly prohibited. Suppliers must have effective policies, controls and reporting mechanisms to prevent such conduct, address concerns promptly and fairly, and protect individuals from retaliation.

Retaliation? - Zero Tolerance!

We are committed to protecting those who raise concerns in good faith and do not tolerate any form of retaliation against colleagues who report possible or actual breaches of Our Code. We consider retaliation as gross misconduct and anyone who believes they have suffered detriment after speaking up should raise this immediately with their line manager, Employee Relations or via Speak Up.

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