
Centrica

Our Approach to Political Involvement

Version:	2026
Owned by:	Alex Anderson, Public Affairs Director
Approved by:	Alan McLaughlin, Group Corporate Affairs Director
Date approved:	August 2026

1. Introduction

- 1.1 Our Approach to Political Involvement supports [Our Code](#), to ensure 'we engage with governments and politicians responsibly'.
- 1.2 Centrica operates in a highly-regulated market. Public policy decisions can affect all aspects of our operations including investments, consumer protection and employment relations.
- 1.3 Lobbying is a normal, acceptable and important part of the legislative process, provided all legal requirements are complied with.
- 1.4 Laws and regulations governing the activities of public affairs practitioners or attempts to influence the policy environment vary around the world. Centrica will uphold the spirit and letter of all relevant laws relating to our political activities.

2. Purpose

- 2.1 This document supports our high-level position set out in Our Code. It provides greater detail to explain the responsibilities of Group functions and business units, in observing and upholding our position on political involvement.

3. Scope

- 3.1 Our approach to political involvement disclosed here and in Our Code, applies to all Centrica employees (permanent or temporary staff, consultants and contractors) and extends to all our majority-owned businesses or business transactions in every country where our subsidiaries, our associates and we operate.
- 3.2 Where we have a minority interest we will encourage this approach to be applied among our business partners including contractors, suppliers and joint venture partners.

4. Approach

- 4.1 Centrica operates on a politically neutral basis and works closely with interested parties to inform policy on key issues including energy, environment, consumer policy and employment relations.
- 4.2 We proactively engage with our stakeholders, including government, legislators and regulators in order to shape proposals and manage risks. In developing our policy positions, we engage with a wide range of interested parties including charities, environmental groups and academics. Centrica does not make political contributions – whether to political parties, individual politicians or government employees. Centrica fully complies with the Political Parties, Elections and Referendum Act 2000 in the UK; as well as relevant devolved legislation; and with the Federal Election Campaign Act in the USA.
- 4.3 Centrica does not contract the services of individuals holding elected political office or serving in roles with executive political authority. Exceptions may be made for non-affiliated members of parliamentary or legislative bodies who do not hold party-political roles or actively engage in partisan political activities, subject to compliance and governance review.
- 4.4 In the UK the Ministerial Code prohibits Ministers from lobbying Government for two years from leaving office. Former Ministers must further seek advice from the independent Advisory Committee on Business Appointments about any appointments or employment they wish to

take up within two years of leaving office¹. Similar rules apply to civil servants and special advisers for two years after their last day of paid service. The Advisory Committee on Business Appointments (ACOBA), which provides advice on these rules, includes a standard phrase of “for two years from his last day of service he should not become personally involved in lobbying UK Government” in their guidance to former senior officials taking up new roles in the private sector. We support these safeguards and abide by them.

- 4.5 Centrica is registered with the EU Transparency Register. Responses to EU consultations must include Centrica’s EU Transparency register ID: 577829817108-84. Our entry can be found [online](#).
- 4.6 Centrica is also registered and complies with the Lobbying (Scotland) Act which came into force in March 2018. This requires us to declare all regulated lobbying under the terms of the Act, including meetings with Members of the Scottish Parliament (MSPs); Members of the Scottish Government (including the Scottish Law Officers); Scottish Ministers and Special Advisers and the Permanent Secretary of the Scottish Government. All registrations can be found within the Register [here](#).
- 4.7 In Ireland, Bord Gáis Energy complies with the Regulation of Lobbying Act (2015). This requires us to make information available to the public on the identity of those communicating with designated public officials on specific policy, legislative matters or prospective decisions through a web-based Register of Lobbying. Designated Public Officials (DPOs) under the Act are: Ministers and Ministers of State; TDs and Senators; MEPs for Irish constituencies; Members of local authorities; Special Advisers to Ministers and Ministers of State who have been appointed under section 11 of the Public Service Management Act 1997; Public Servants as prescribed; and other categories of persons as prescribed. All Bord Gáis Energy registrations can be found [here](#).
- 4.8 Centrica will conduct all direct advocacy with governments, regulators and policymakers in line with our climate goals and those of the Paris Agreement and assess indirect advocacy through trade associations we’re members of, against our climate goals and those of the Paris Agreement to ensure no misalignment. Trade association memberships will be assessed and approved by the Centrica Corporate Affairs Director.

5. Responsibilities

- 5.1 The Group Chief Executive has primary responsibility for implementing our approach on political involvement and for reporting to the Centrica Board of Directors. The business leader of each business unit will establish appropriate responsibilities and procedures within their operations.
- 5.2 Review processes are in place to ensure our approach remains effective and bribery and corruption risk is avoided. Political activities are reviewed by the Board’s Executive Committee twice a year. Internal Audit also review internal controls and financial records as required, to ensure activities are properly documented and remain effective in countering bribery and corruption.
- 5.3 Centrica recognises that engagement with governments, policymakers and wider stakeholders carries potential financial crime risks, including bribery and corruption, fraud, sanctions exposure, misuse of confidential or inside information, and the risk of providing inaccurate or misleading information in public-facing materials or policy engagement. These risks can arise through routine Corporate Affairs activity - including meetings with public officials, use of external advisers, participation in consultations, membership of industry groups, or the preparation of public statements and disclosures. While such activities are a normal and important part of the policy-making process, they must always be conducted in a

¹ Advisory Committee on Business Appointments, Fifteenth Annual Report, 2013-14.

manner that is transparent, proportionate and consistent with Centrica's ethical standards and legal obligations.

- 5.4 All colleagues are expected to consider financial crime risks as part of planning and delivering public affairs activity. This includes ensuring that:
- interactions with government officials and third parties are appropriate, properly recorded and compliant with applicable lobbying and transparency requirements;
 - no direct or indirect inducements are offered or accepted, including through gifts, hospitality or third-party arrangements;
 - any potential conflicts of interest are identified and managed appropriately; and
 - information shared externally - whether in meetings, submissions or publications - is accurate, evidence-based and consistent with approved company positions and disclosures.
- 5.5 These expectations are supported by established Group controls, including policies on gifts and hospitality, conflicts of interest, handling of confidential and inside information, and governance over approvals and disclosures.
- 5.6 By embedding consideration of financial crime risk into our public affairs activity, we protect the integrity of our engagement, maintain trust with stakeholders, and ensure compliance with the legal and regulatory frameworks in which we operate.
- 5.7 Designated employees in Group Corporate Affairs are responsible for engaging in and co-ordinating planned public affairs activity on Centrica's behalf. Given the range of touchpoints at which the business engages with Ministers, civil servants, parliamentarians and policymakers, all engagement of this kind must be agreed in advance with the Public Affairs team, with meeting notes shared where approved. This helps avoid duplication and cut-across, and ensures a joined-up approach, since individual meetings may not always be arranged with visibility of the wider context or parallel conversations taking place. No employee or director must make direct or indirect contributions or any form of inducement to political parties, individual politicians or government employees on behalf of the company.
- 5.8 Centrica may legitimately incur costs in engaging in public policy conversations (for example, attendance at party conferences). The Group Corporate Affairs Director is responsible for authorising such costs in line with delegated spending limits.
- 5.9 This document does not preclude you from making donations to, being a member of or standing as a candidate for, a political party in your personal capacity. However, if you are involved in political activity outside work, you must ensure your involvement does not, in any way, represent the views of Centrica or bring the company into disrepute.