



# Workforce Disclosure Initiative

## WDI Survey 2025

Centrica

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# COMPANY DETAILS

Reporting period

Question Number	Question Text	Question Tier	Privacy setting of Answer	Scoring Information	Answer Criteria
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	Start date	Mandatory Public		0
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01 January 2024

	End date	Mandatory Public		0
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31 December 2024

# 1 GOVERNANCE

## Governance structure and management

Question Number	Question Text	Question Tier	Privacy setting of Answer	Scoring Information	Answer Criteria
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1.1	Which workforce-related topics are subject to Board level oversight (Board members and committees), if any? Select all that apply.	F	Mandatory Public		Yes/No
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All of the following items will be selected via the online submission.

- Attracting and retaining workers - selected
- Diversity and Inclusion – selected
- Forced labour, modern slavery and Human trafficking – selected
- Gender pay equity – selected
- Grievance and whistle blowing processes - selected
- Human Resources - selected

- Human rights – selected
- Mental health in the workplace - selected
- Occupational health and safety – selected
- Responsible sourcing – selected
- Training and development – selected
- Wage levels / living wages – selected
- Worker engagement – selected
- Other

1.2	Identify the Board members and committees and/or executive management positions with governance responsibility for workforce matters in the company’s direct operations and supply chains. State their remit of responsibility.	F	Mandatory PUBLIC		150 word limit
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The Board has two Executive Directors (Chief Executive Officer and Chief Financial Officer) alongside nine Non-Executive and Independent Directors, including the Chair. The Board ultimately has responsibility for agreeing workforce strategy proposed by People, H&S, Responsible Sourcing & Sustainability teams amongst others, and holds them to account. They’re supported by various Committees and forums in carrying out this duty - principally the Safety, Environment and Sustainability Committee (SESC) and Centrica Leadership Team (CLT). Together, they review matters such as engagement, attraction and retention, diversity, equity and inclusion, training and development, health, safety and wellbeing, human resources, human rights issues like modern slavery, responsible sourcing, grievances and whistleblowing. The latter two also go to the Audit and Risk Committee (ARC) who reviews compliance and risk. The Remuneration Committee predominantly covers salary levels and bonus aligned to performance. Meanwhile, the Nominations Committee reviews senior attraction and retention for succession planning.

1.3	Describe how information on workforce matters is integrated into governance processes, and how this informs company strategic planning.	F	Mandatory PUBLIC		250 word limit
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The Board has overall responsibility for and regularly reviews workforce matters. Members sit on people-focused Committees to optimise collaboration with leaders and inform strategic decisions. Workforce strategy and performance are primarily managed via triannual SESC meetings and around 11 CLT meetings a year. Progress against our People & Planet Plan together with plans to achieve them are reviewed. At least annually, SESC and CLT reviews and approves the forward business schedule for the year, comprising of priority areas and standing items like engagement, H&S, training, DE&I and responsible sourcing, proposed by

leaders from People, H&S, Responsible Sourcing and Sustainability amongst others, with the Group Chief People Officer and Group General Counsel and Company Secretary overseeing. SESC also receives reports from Internal Audit and Risk on adequacy of systems to identify and manage people-related risks and opportunities. Key areas of focus like human rights and skills are tabled, with any pertinent issues including action against modern slavery, recommended for Board consideration. The Board additionally receives minutes, actions and updates from wider Committee Chairs to assist overseeing key issues like DE&I, remuneration and incentives. The Nominations Committee further assists the Board with succession planning. Workforce divisions report these stated issues to the stated bodies and challenges performance or areas of improvement as necessary. Through good governance like this, we've the right strategic planning in place to add value to our business model to ensure we deliver on our Purpose: to energise a greener, fairer future.

1.4	How does the company ensure those with governance responsibility (identified at Q1.2), possess, or have access to, sufficient expertise on workforce matters, such as those identified at Q1.1? Provide one example of how the company has ensured sufficient expertise for those with governance responsibilities	F	PUBLIC		250 word limit
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We review and refresh Board capability to ensure they've the necessary expertise to effectively govern workforce matters and champion the needs of colleagues. Workforce management is a shared responsibility across the Board so expertise is assessed during recruitment and annually, including reviewing past employment history as well as consulting on knowledge and establishing gaps. This process is supported by the Chair, who informed by the Nominations Committee, is responsible for Board training and discusses needs with each Director to ensure we maintain the right mix of skills and experience. An annual Board Evaluation Review in line with the UK Code, further shapes this process by reviewing effectiveness and identifying areas for continuous improvement, with facilitation by an independent third party every three years (see Q1.5). An annual training and engagement plan is subsequently established. As a result in 2024, Board members travelled to Aalborg and Glasgow sites, to better understand business operations as well as meet colleagues to learn more about their working environment and answer questions. The Board were additionally supported by our Shadow Board of diverse colleagues who serve a 24-month term and regularly meet leaders to share views and deliver colleague-centric outcomes. Our Joint Council comprised of union leaders alongside our own, further ensures key developments/concerns are discussed collaboratively. Leaders hear from colleagues at townhalls and receive insight via quarterly engagement surveys, with KPIs tracking how colleagues feel about leadership and whether they believe their voices are heard/acted upon across workforce matters like DE&I and skills.

Performance incentives

Question Number	Question Text	Question Tier	Privacy setting of Answer	Scoring Information	Answer Criteria
1.5	How does the company assess and incentivise the performance of those with governance responsibility (identified at Q1.2) for workforce matters, such as those identified at Q1.1? Include relevant KPIs and weighting in compensation or remuneration schemes.	F	PUBLIC		250 word limit

Our governance structure enables effective performance evaluation which is reflected in remuneration arrangements. The Board and its Committees regularly review and challenge progress against KPIs and targets across key issues like DE&I (e.g. gender parity goal), HSE (e.g. process safety), engagement (e.g. engagement score) and modern slavery (e.g. indicators/incidence). To ensure the Board and its Committees operate effectively, a performance evaluation is conducted to assess discharge of duties and company performance annually, with an externally facilitated evaluation triennially. The 2024 independent assessment undertaken by the Institute of Business Ethics, concluded that the Board operated effectively with actions agreed to deliver continuous improvement such as aligning the skills matrix with succession planning and improving visibility. Feedback on individual Directors is flowed into the annual review process. The remuneration plan for Executive Directors and wider colleagues is tied to short and long-term performance incentives across 18 metrics with a combined weight of 37.5% in determining awards, including KPIs like engagement alongside those for our transition to net zero. The Annual Incentive Plan has targets and weightings allocated annually by the independent Remuneration Committee. The Restricted Share Plan has a three-year vesting period and a two-year holding period, with the Committee making decisions on targets and performance subject to a performance underpin. This ensures consideration of matters like sanctions, fines and/or a major incident, alongside overall progress achieved against KPIs. Where relevant, specific performance criteria is embedded in wider leadership objectives, with associated compensation arrangements. This ensures we drive accountability and sustainable progress.

Delegating authority

Question Number	Question Text	Question Tier	Privacy setting of Answer	Scoring Information	Answer Criteria
1.6	How does the company organise the day-to-day management of workforce matters, including within supply chains, to delegate responsibility for managing risks to workers' rights to the relevant business functions and senior managers, and beyond?	F	Mandatory PUBLIC		250 word limit

The Board and Group Chief Executive Officer has overall responsibility for business strategy which encapsulates workforce matters. To discharge duties effectively, delegated authority is given to relevant Committees - primarily the SESC but also the CLT alongside Audit and Risk, Nominations and Remuneration Committees. SESC reviews and recommends the Group sustainability strategy, key initiatives, new commitments and policies for approval. SESC additionally monitors progress relating to areas like our People & Planet Plan goals or modern slavery prevention. Our Group Chief People Officer is key in overseeing the management of workforce issues, including setting policies and procedures. She consults and briefs her People Leadership Team, who in turn have responsibility for embedding policies and procedures as well as advancing action on projects to better support colleagues. Involved teams cover a spectrum of specialisms such as Reward, Learning & Development and DE&I. Our VP of Procurement has oversight of supply chain management and is supported by a team of Procurement and Responsible Sourcing leads, to likewise set and manage policies and procedures day-to-day. Collaboration is also sought beyond the People and Procurement functions as needed, including leaders from Ethics and Compliance as well as H&S. Leaders receive training to support their teams to deliver effectively, overseeing day-to-day management and conducting quarterly performance reviews to review effectiveness. Leaders also flag and monitor associated risks and opportunities via the Enterprise Risk and Controls team.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
1.7	Does the company have a public commitment to respect all internationally recognised human rights that is approved at Board level? Provide a link to or attach the relevant public documents. If the company does not have the commitment, explain why not and any plans to adopt one, including an expected date for publication.	F	Mandatory PUBLIC		150 words

We're a member of the UN Global Compact and adhere to internationally recognised human rights standards such as the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Our human rights due diligence is based on these principles and helps ensure we operate in a way that safeguards human rights. Our Code of conduct sets out our approach to human rights which is aligned to these standards and approved by the Board. Our Code is available at [www.centrica.com/ourcode](http://www.centrica.com/ourcode).

1.8	Does the company have a public commitment to prohibiting, identifying, and preventing forced labour, modern slavery and human trafficking in its operations and value chain? Provide a link to or attach the relevant public documents. If the company does not have the commitment, explain why not and any plans to adopt one, including an expected date for publication.	F	Mandatory PUBLIC		URL/doc upload 150 words
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The respect of human rights is fundamental to our Purpose and integral to how we operate as a business. Our Code sets out our approach to prohibiting, identifying and preventing forced labour, modern slavery and human trafficking in our direct operations as well as our wider value chain at [www.centrica.com/ourcode](http://www.centrica.com/ourcode). Our annual Modern Slavery Statement supports Our Code and provides further information on our approach and ongoing commitment on this important topic at [www.centrica.com/modernslavery](http://www.centrica.com/modernslavery).

1.9	Does the company have a public commitment to provide a remedy where it has caused or contributed to adverse human rights impacts affecting/linked to its business operations and relationships? Provide a link to or attach the relevant public documents. If the company does not have the commitment, explain why not and any plans to adopt one, including an expected date for publication.	F	Mandatory PUBLIC		150 words
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If we identify human rights impacts across our value chain, including trafficking and/or modern slavery, we will co-operate in or provide appropriate and legitimate processes to ensure remedy. We have a public commitment to provide remedy where we may have directly or indirectly contributed to or caused adverse human rights impacts. This commitment is available in Our Code and our Modern Slavery Statement, both of which are available at: [www.centrica.com/ourcode](http://www.centrica.com/ourcode) and [www.centrica.com/modernslavery](http://www.centrica.com/modernslavery).

## 2 RISK ASSESSMENT AND HUMAN RIGHTS DUE DILIGENCE

### Human rights and due diligence

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
2.1	Does the company conduct regular human rights due diligence to identify, prevent, mitigate and account for human rights risks and adverse impacts?	F	Mandatory PUBLIC		Yes/No

Yes

2.1a	If yes, provide more information (see guidance for what to include).	F	Mandatory PUBLIC		250 word limit
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Due diligence helps identify, prevent, mitigate and account for actual/potential human rights impacts, with processes aligned to the ILO Core Conventions, UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Diligence spans direct operations, supply chain and business partners. Risks are aggregated at Group with analysis occurring at business unit (BU) and project level quarterly. In direct operations, we've a lower level of risk with mature policies, processes and practices, including checks on rights to work. Where risks are identified, targeted action plans are developed which may involve updates to policies and processes. Supply chain risk is considered greater. We use third-party supplier sustainability management platforms alongside country and commodity risk rating tools, to undertake due diligence aligned with our Responsible Sourcing Policy during onboarding and subsequent evaluations. If flagged as higher risk, an audit is undertaken. Findings are shared with relevant personnel to determine action including collaboration to raise standards or terminating our relationship and reporting the abuse. Procurement/others may flag risks with relevant risk teams and leaders including the Board, who can request a deep dive to review action. Higher risk teams receive targeted human rights training whilst all colleagues undertake Our Code training which spans human rights which is reviewed annually. Effectiveness is tracked with KPIs like training completion rates and number of grievances and audit findings. Positive outcomes in 2024 include raising labour standards through corrective action plans to address 191 non-compliances identified through audits. See more: [Modern Slavery Statement](#).

## Risks and Opportunities

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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2.2	Describe the company's process for identifying and assessing workforce risks and opportunities in its direct operations. Include how the company's human rights due diligence activities inform the process.	F	Mandatory PUBLIC		250 word limit
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Risks are identified and assessed via risk registers and managed through the Enterprise Risk Management Framework (ERM), which covers 0–5-year risks. Longer-term emerging risks are considered and inform ERM and Board strategic planning. Risks are typically assessed at a BU level, with subject matter experts (SMEs) incorporating stakeholder feedback (e.g. colleagues, trade

unions) to evaluate impact and likelihood (1–5 scale), alongside financial impact (1–5 scale), whilst applying mitigating controls. Day-to-day ownership sits with BU management. Heads of Enterprise Risk and Group Controls attend BU Risk and Control committees to identify themes or escalate risks to the Group Risk Control and Compliance Forum, which meets quarterly and monitors Principal Risks, chaired by the Group General Counsel. Risk profiles are subsequently shared with CLT before quarterly review by the Board’s ARC. The Board also reviews risk annually in its Strategic Review and approves the Principal Risk and Uncertainties disclosure. Management and control systems are evaluated annually, supported by senior management certification of controls and policy adherence. Our workforce strategy continues to evolve to address strategic risks and opportunities. In 2021, the SESC and Board approved our People & Planet Plan to build a more sustainable and inclusive future. This involved SMEs conducting a materiality assessment using internal and external feedback to identify ESG risks and opportunities where we have the biggest impact and can make the greatest difference. This process is being enhanced through double materiality assessment processes aligned with CSRD for ESG risk identification and management.

2.3	Describe the company's process for identifying and assessing workforce risks and opportunities in its value chain, if different from Q2.2. Include how the company's human rights due diligence activities inform the process	F	Mandatory PUBLIC		250 word limit
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The process outlined in Q2.2 also applies to identifying and assessing value chain workforce risks and opportunities, which are fed into the Group’s ERM and materiality processes. Some specific procedures are, however, worth highlighting. For example, we continuously risk rate suppliers using a country and sector risk segmentation third-party tool which considers the product and/or service being offered alongside any risks including those relating to human rights. Suppliers flagged as potentially higher risk undergo enhanced risk assessment, reviewing sustainability standards such as labour and workers’ rights. If a supplier remains high risk, a third-party auditor conducts a site visit or remote worker survey to assess human rights including labour and H&S practices. During the audit, workers are observed and any direct contact considered. If the supplier fails to meet our standards, we collaborate to deliver improvements. Audit results are communicated via the auditor. Corrective action plans are subsequently agreed with suppliers and tracked by Procurement Managers. If suppliers cannot or will not raise standards, the relationship may be terminated. Outcomes are shared at least annually with SESC to ensure oversight. We also engage third-party experts like the Slave Free Alliance, to gain insight into potential human rights issues and enable continuous strengthening of processes. The Procurement Director is responsible for ensuring a responsible supply chain and embedding this commitment via Procurement Managers. Procurement Managers receive targeted training to identify risks and opportunities in ongoing engagements.

2.4	Identify three workforce opportunities for the business relating to the company's direct operations and/or supply chain.		F	Mandatory PUBLIC	
Business opportunities <i>(Please note row headings cannot be edited nor rows added)</i>	Category of opportunity (select one)	Description (25 words)	More details (150 words)		
Opportunity 1	Diversity & Inclusion	To build a more sustainable future, we need a diverse and inclusive team, where every colleague feels welcome and able to succeed.	Achieving net zero is a big challenge and to get there, we need the best team – a diverse team where different thoughts and ideas can come together, to create innovative solutions that meet the needs of our customers now and into the future. We promote diversity and inclusion by targeting greater representation through our goal to reflect the full diversity of our communities by 2030, whilst advancing our culture of inclusion to ensure every colleague feels counted. This enables colleagues to feel motivated, engaged and able to be their best selves.		
Opportunity 2	Training	Training and skills investment is critical to developing our workforce which is key to colleague and customer satisfaction.	Colleagues are the beating heart of our business so we must invest in providing enhanced training and skills development opportunities now and through the energy transition. To achieve this, we've set a goal to create 3,500 apprentices whilst providing skills development opportunities more broadly which includes improving digital fluency. As a result, colleagues will have the opportunity to develop a fulfilling and exciting career they can be proud of which boosts job satisfaction and wellbeing. In turn, their skills will help us better satisfy the diverse needs of our 10m customers.		
Opportunity 3	Employee Engagement	Positive employee engagement and social dialogue drives increased satisfaction and	Having an engaged workforce is key to running and growing a successful business. To ensure we have the engaged team that's needed to deliver for our customers, we listen to colleagues and strive to act quickly and effectively on issues that matter to them. We also aim to provide a caring and		

		productivity.	supportive environment that enables our colleagues to feel empowered and thrive. In doing so, we can boost satisfaction and productivity whilst reducing unplanned attrition and absence.
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2.5	What action has the company taken, or intends to take, to ensure these opportunities add value to the company? If none, please explain why not and any plans to do so in the future.	F	PUBLIC		Table (250 word limit)
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Business opportunities	Action taken to capitalise on identified opportunities
Opportunity 1 – Diversity & Inclusion	We're supporting every colleague to be themselves and better serve our customers by advancing dedicated DE&I Positive Action Plans. Towards this, we're focused on 1) advancing diversity of representation with our People & Planet Plan goal to reflect the full diversity of our communities by 2030 – this means attracting, promoting and retaining more diverse talent by targeting all company and senior leaders to be 48% women, 18% ethnically diverse, 20% disability, 3% LGBTQ+ and 4% ex-service (aligned with Census data for working populations). In support of this, we're 2) providing equity of opportunity with initiatives like embedding diverse shortlists and succession planning, expanding talent and development programmes for all, and providing industry-leading approaches that help different colleagues be at their best including via our carers leave and fertility support as well as through enhanced paternity leave and flexible working. We're also focused on 3) valuing difference by growing our culture of inclusion and sense of belonging through educational and awareness opportunities delivered centrally and in conjunction with our 10+ colleague-led diversity networks, whilst collaborating with forward-thinking forums like the POWERful Women Leaders Coalition to drive change beyond our business. Since we launched our goals, we've made steady progress with improvements of up to 6% since 2021 and 3% during 2024. Our efforts have earned colleague and third-party recognition, demonstrated by DE&I being ranked in the top quartile via our engagement survey and achieving inclusion in The Times Top 50 Employers for Gender Equality.

<p>Opportunity 2 – Training</p>	<p>With training consistently highlighted by colleagues as a top priority, we've evolved our learning and development offer to meet colleague and business needs. We launched My Learning Campus in 2022, where all colleagues can access training on core skills needed for their job alongside growth areas like leadership development. The Campus receives excellent feedback which we review and use to introduce new opportunities to grow capability and close skills gaps year-on-year. One example is our Powered by Purpose digital learning programme launched in 2025, which uses a gamified approach to drive success by better connecting colleagues to our Purpose and behaviours, with additional levels soon to be available to enhance digital fluency on topics like AI. This is supplemented with targeted mentoring for under-represented groups, including the 30% cross-sector mentoring programme. We're also tapping into the talent of under-represented groups to grow a more inclusive and sustainable future through our People &amp; Planet Plan goal to recruit 3,500 apprentices with the ambition that 50% of engineering apprentices will be women. The ability to do this is underpinned by our world-class British Gas Training Academies which is also being harnessed to progress our ambition for 3,000 of our engineers to have green skills by 2030. Effectiveness is demonstrated by positive engagement scores for training offerings, as well as over 1,500 apprentices being recruited since 2021 with 19% of engineering roles being filled by women compared to the 0.3% gas engineering UK national average amongst others.</p>
<p>Opportunity 3 – Employee Engagement</p>	<p>We listen to colleagues and act on key issues – whether that's through their desire to feel more connected to the company Purpose, strategy and leaders, or wanting to feel more supported and enabled through an enhanced focus on DE&amp;I, training and wellbeing. Towards this, we launched a new Purpose in 2024 to energise a greener, fairer future and ensured every colleague understood how they contributed to it and why working for us is more than a career. Regular leader-led townhalls brought our Purpose, strategy and leadership team to life, whilst providing colleagues with the opportunity to ask questions or share concerns and ideas. Leaders furthermore continue to uphold their Open Letter commitment to create a more diverse and inclusive company, supported by enhanced DE&amp;I efforts, training and wellbeing offerings whilst embracing a flexible-first approach to working. This enables colleagues to better balance work with personal commitments/preferences, by choosing when to work from home or come into the office. With volunteering being a key lever of engagement, we also empower colleagues to support local causes they're passionate about and in 2024, they volunteered 10,700 days towards our 100,000 day goal by 2030. We run quarterly engagement surveys and focus groups, enabling continuous dialogue and ability to adjust plans. By prioritising colleagues with action like this, engagement levels have risen year-on-year for the past five years and in 2024, our engagement score rose to top quartile for our sector and retention improved.</p>

2.6	What are the company's salient human rights issues relating to workers' rights in the company's value chain? Select the area of the business as applicable.	F	Mandatory PUBLIC	Table
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Salient human rights issues <i>(Please note row headings cannot be edited nor rows added)</i>	Category of human rights issue	Description (25 words)	More details (150 words)	Area of the business [drop down, not scored]
Issue 1	Health & Safety and Wellbeing	Failure to keep workers safe and well is a key risk because it could result in avoidable harm alongside adverse legal, regulatory and reputational impact.	Keeping colleagues safe and well is a core foundation of how we do business – from colleagues working at home or in the office (lower risk), to engineers travelling to homes and businesses or working at one of our energy assets (higher risk). We're therefore committed to reinforcing a strong safety culture whilst providing a proactive approach to wellbeing. Significant H&S events such as fires or explosions, could not only cause people avoidable harm but impact service levels as well as lead to legal, regulatory and reputational repercussions as well as disrupt operations and/or service levels. This could adversely affect some/all of our business. In our supply chain, the risk of not protecting the health, safety and wellbeing of workers is greatest in operations where machinery is involved, such as factories, and in higher risk countries like China and India.	<ul style="list-style-type: none"> <li>- Direct operations</li> <li>- First tier supplier</li> </ul>

Issue 2	Modern slavery & child labour	Modern slavery and child labour is a hidden but real risk, causing undoubted harm and potential legal, regulatory and reputational impact.	Although we have zero-tolerance for modern slavery and child labour, we know that risk exists, especially in our supply chain where we've less transparency and control over activity. Based on associated jurisdictional and industry risk, the following areas are most at risk which include suppliers that manufacture garments, solar and battery systems alongside smart technology products, which often have operations in areas like China and India. At the same time, we must look within our direct operations to ensure that all colleagues have freely and legally chosen to work for us. With the rising risk of modern slavery over the last decade, all companies in the UK are required to publish an annual statement, setting out whether they've identified modern slavery together with the steps taken to mitigate risk and/or seek resolution.	<ul style="list-style-type: none"> <li>- Direct operations</li> <li>- First tier supplier</li> </ul>
Issue 3	Diversity & Inclusion	Sexual harassment/discrimination is a persistent feature of society that's under-reported. This is a risk to colleague wellbeing and could cause legal, regulatory and reputational impact.	We pride ourselves on being an inclusive place to work but we know there's more that must be done to reduce risk of workplace sexual harassment and discrimination, irrespective of whether the intention was conscious or unconscious. Unwanted conduct of a sexual nature violates dignity and creates a hostile, intimidating and offensive environment. That's why we fully support our legal duty to take all reasonable steps to prevent occurrence among our workforce. Failure to do so could cause adverse harm to colleagues and may inhibit their ability to be at their best and actively contribute to the success of the company. It could also lead to potential legal action and reputational damage. Protections are also in place to safeguard workers in the supply chain. Workers most at risk include those who may appear more vulnerable, such as women and the young alongside migrants and/or refugees in the supply chain.	<ul style="list-style-type: none"> <li>- Direct operations</li> <li>- First tier supplier</li> </ul>

2.7	How did consultations with workers and/or worker representative bodies, including trade unions, help the company identify these salient human rights issues? State the stakeholders consulted.	F	Mandatory PUBLIC		Table
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Salient human rights issues <i>(Please note row headings cannot be edited nor rows added)</i>	Consultations with workers and other stakeholders (250 words)
Issue 1 - Health & Safety and Wellbeing	<p>Within our business, we've H&amp;S and wellbeing management systems which are informed by stakeholder input. We invest in training and regularly engage agencies like the Oil and Gas Authority, the Health and Safety Executive and the Department for Energy Security and Net Zero, to ensure legal and regulatory compliance. We also collaborate with organisations like the CCLA, to promote wellbeing best practice. Additionally we frequently engage lead UK trade unions such as GMB, Unite, Prospect and Unison, using input to create/update H&amp;S policies and procedures, support incident investigation, conduct inspections and input into addressing risk areas. Union safety representatives receive updates on wellbeing metrics and HSE reports, to assist this process. Moreover, colleagues are engaged directly face-to-face and online, to capture feedback. For example, our Involve Me forum enables input on safety workwear whilst focus groups and Our Voice engagement surveys, ask colleagues to share how we can better support their welfare. In our supply chain, we work with external sustainability supply chain platforms and analysts, to review risk of new and strategic suppliers. Higher risk suppliers then receive either an independent audit site visit or remote worker survey, to assess working environments and seek worker feedback. If risk is identified, this typically results in a collaborative action plan to raise standards. Meanwhile, ethical and trade organisations like the Slave Free Alliance, enable us to stay abreast of supply chain best practice to continually inform identification and mitigation of H&amp;S and wellbeing risks.</p>

<p>Issue 2 - Modern Slavery &amp; Child Labour</p>	<p>Internal and external stakeholder views are essential in aiding our identification and mitigation of forced as well as child labour. For example, our external supply chain experts review and rate the risk of forced labour for all new and strategic suppliers, which enables us to identify whether further exploratory action is needed. If required, we may further use an independent auditor to conduct a site inspection or remote worker survey, whose views are vital in providing a clearer picture of the potential or actual level of risk. Workers are interviewed as part of this process whilst also having the opportunity to share concerns more broadly via an independent and anonymous Speak Up phone and online helpline. All of these channels, help us determine appropriate action – whether working with the supplier to establish an action plan to raise standards, or ending our relationship and reporting the abuse. Meanwhile, we partner with ethical and trade organisations such as the Slave Free Alliance and Utilities Against Slavery, to stay informed on risks and best practice within and across sectors, which helps continuously strengthen approach within direct and indirect operations. We also work with employment agencies and recruitment teams to ensure effective controls across direct operations, including right to work screening and adopting the ‘Employer Pays Principle’, so that temporary and permanent workers never have to pay to work for us.</p>
<p>Issue 3 - Diversity and Inclusion</p>	<p>We’ve consulted with internal and external stakeholders to strengthen identification, mitigation and resolution methods relating to sexual discrimination and harassment during 2024. Our approach has been informed through a series of engagement activities, including focus groups to understand colleague sentiment on sexual harassment and other forms of harassment. We also worked with expert organisations like Pinsent Masons and recognised trade unions, to develop and implement a new policy specifically on the prevention of sexual harassment. We continue to use insight from ongoing investigations into cases colleagues have raised via our Speak Up helpline alongside grievance channels, to enhance our understanding of incidence, risk and ultimately inform future actions to help mitigate harassment as well as ensure colleague are given sufficient support during the process. To identify discrimination and harassment in our supply chain, we run the same process as set out in Issues 1 and 2. This includes external supply chain experts reviewing and risk-rating new and strategic suppliers for discrimination and harassment. We use an independent auditor to complete site inspections or remote worker surveys for higher risk suppliers, whose views provide clarity on appropriate action – from establishing an action plan, to terminating our relationship and reporting the abuse. Meanwhile, we partner with ethical and trade organisations like the Slave Free Alliance, to stay attuned to latest insight that informs the evolution of our responsible sourcing practices.</p>

2.8	What action has the company taken, or intends to take, to prevent and mitigate salient human rights issues identified?	I	Mandatory PUBLIC		Table
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<b>Salient human rights issues</b> <i>(Please note row headings cannot be edited nor rows added)</i>	<b>Action taken by the company</b>
Issue 1 - Health & Safety and Wellbeing	<p>Within our business, our H&amp;S and wellbeing management systems include policies, standards, and procedures, to protect colleagues and third-parties. These are available to colleagues and as needed, rolled into induction, refresher training, awareness campaigns and leadership communications. Colleagues undertake annual Our Code training which includes the commitment to a safe and healthy workplace. Through awareness campaigns, colleagues are encouraged to speak up about concerns to line managers, People teams and/or the Speak Up helpline to ensure issues are addressed. They're likewise encouraged to seek expert advice through our wellbeing support suite which includes our 120-strong network of colleague Mental Health First Aiders, a 24/7 MyCare helpline and a company-funded benefit healthcare plan for all. We engage the likes of the Oil and Gas Authority, UK HSE, Enhesa and the CCLA, to ensure compliance with legislative/regulatory requirements and grow best practice. Due diligence is additionally undertaken over suppliers to reduce risk. This includes risk rating all new and strategic suppliers and if needed, conducting further evaluations and audits. The majority of improvement areas arising from supplier audits related to health and safety. We've worked with suppliers to embed corrective action plans to raise standards. All suppliers are also required to uphold clauses in supplier contracts to ensure the health and safety of workers, whilst our labour practice toolkit encourages adoption of H&amp;S practices that go beyond compliance. The SESC reviews safety performance three times a year and supplier due diligence at least annually, ensuring challenge and oversight.</p>

<p>Issue 2 - Modern Slavery &amp; Child Labour</p>	<p>All suppliers are required to uphold anti-modern slavery and child labour clauses in contracts whilst our labour practice toolkit helps advance labour practices beyond compliance. We additionally conduct supplier due diligence which includes risk rating all new and strategic suppliers and if needed, conducting a site inspection or remote worker survey, to help us better understand the risk and resultant action needed – whether that’s working with the supplier to raise standards, or terminating our relationship and reporting the abuse. To this end, we ran 27 site audits alongside remote worker surveys during 2024. Training is also a vital part of mitigating risk, reflected by all of our Procurement Managers completing dedicated training to enhance ability to identify and report signs of modern slavery or child labour. Within our business, we additionally aim to educate and raise awareness of modern slavery, requiring all colleagues to undertake the annual Our Code training which includes a commitment to uphold human rights whilst running awareness campaigns and encouraging concerns to be raised via our Speak Up helpline, enabling investigation and remedial action. Meanwhile, partnering with organisations like the Slave Free Alliance and Utilities Against Modern Slavery as well as the Solar Steward Initiative, enable collective advancements to reduce risk. The SESC and Board reviews risk and sufficiency of action at least annually. No instances of modern slavery or child labour were identified during 2024.</p>
<p>Issue 3 - Diversity &amp; Inclusion</p>	<p>We’ve taken all reasonable preventative steps against sexual harassment and discrimination. In 2024, we introduced a Workplace Prevention of Sexual Harassment Policy which clearly sets out what harassment means, how we expect colleagues to behave, and what colleagues/managers should do if they experience or suspect harassment. The policy is being embedded through dedicated in-depth leadership and employee training, with Our Code continuing to provide training to help everyone support a culture that’s free from discrimination and harassment which 99% of colleagues completed and stated they’d uphold. All-employee campaigns encouraged colleagues to speak up and raise concerns whilst signposting our 24/7 MyCare emotional support service. To ensure People teams effectively challenge undesirable behaviour and ensure investigations are sensitively conducted, they also undertook upskilling training. For higher risk activities like our customer-facing operations, we’ve additionally reshaped our abusive customer policy to formalise how we’ll address unacceptable behaviour towards colleagues whilst trialing body cameras for those entering customer homes. In our supply chain, all suppliers have diversity and inclusion clauses they must uphold. We also risk rated all new and strategic suppliers and as necessary, conducted independent audits to better understand risk, with associated corrective action plans implemented as needed. Across operations, collaboration with trade unions and third-party auditors, ensured issues were addressed through open dialogue. At least annually, the ARC reviewed performance related to grievances like sexual harassment and discrimination whilst SESC reviewed supply chain performance to ensure the approach remains effective.</p>

Remediation and effectiveness of actions in the direct operations

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
2.9	Provide an example of how the company has monitored the effectiveness of actions taken to address negative impacts on the human rights of workers in the reporting period, including by consulting with impacted workers and any lessons learned.	I	PUBLIC		250 word limit

Around the world, the solar supply chain has been identified as higher risk. This is because solar panels are reliant on polysilicon production which is predominantly made in China where there’s potential links to forced labour in the Xinjiang Uyghur Autonomous Region (XUAR). We take our responsibility very seriously to monitor developments in relation to forced labour allegations at a raw material level and have taken the following actions to minimise the risk of knowingly or inadvertently procuring solar panels from suppliers with a connection to XUAR within their supply chain. For instance during 2024, we continued to: 1) update and use our preferred supplier list which we had created following a market review using enhanced due diligence to assess a supplier’s potential exposure to XUAR, 2) maintained solar panels in scope of our independent expert audit programme which takes into account worker consultation, 3) collaborated with other industry participants and external experts to influence/drive improvements via the Solar Stewardship Initiative, and 4) maintained leadership oversight of approach, developments and progress at our Human Rights and Modern Slavery Steering Group as well as at the SESC, to ensure ongoing ethical procurement of solar panels. We’ll continue to monitor the solar supply chain closely and act accordingly.

### 3 WORKFORCE COMPOSITION

Structure and location of direct operations

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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3.1	Provide the total number of employees in the company's direct operations.	F	Mandatory PUBLIC		0
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22,423 total headcount comprising of 20,942 employees, 96 fixed-term employees and 1,385 second party contingent workers.

Note Q3.1: We don't include people employed by Spirit Energy due to people management systems not being integrated. Headcount may vary from other annual reporting due to differences in timing of running the report and scope.

Provide the percentage (%) of total employees in the company's direct operations in each of the company's significant operating locations.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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3.2	Please enter the details in the following table	F	Mandatory PUBLIC		Table
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Significant operating location	Percentage (%) of total employees in the direct operations
Group/Global	100
UK	94
Europe	5
USA	1

3.2a	Please define what a “significant operating location” is for your company.	F	Mandatory PUBLIC		150 word limit
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We define a ‘significant operating location’ as a country or region where we have the strongest presence in terms of brands, colleagues and revenue. For example, British Gas and Hive are based in the UK, Bord Gáis Energy in Ireland and Centrica Business Solutions spans both of these locations as well as having a presence in the USA and Europe amongst other countries further afield. Our Europe operations include Ireland, Netherlands, Germany, Belgium, Denmark, and Sweden. Countries further afield include India and Singapore. The majority of our direct workforce are located in the UK, Ireland and Denmark. Group/Global has been provided to easily share aggregated performance as we believe it’s important to transparently provide our overall company performance alongside the wider country-specific breakdown, to ensure a meaningful picture of our company.

3.2b	How many operating locations does your company have in total in your direct operations?	F	Mandatory PUBLIC		50 word limit
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Our HR management system shows operations in ten countries. These include the UK, Ireland, Netherlands, Germany, Belgium, Denmark, Sweden, the USA, India and Singapore. Within these countries, employees are attached to around 80 sites, the majority of which are in the UK.

3.3	Provide the number and/or percentage (%) of the company’s employees on each contract type as a proportion of the total direct operations workforce.	F	Mandatory PUBLIC		Table
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Contract type	Total number of employees on each contract type	Percentage (%) of all direct operations employees on each contract type
Indefinite/permanent employees	20,858	93
Fixed-term/temporary employees	180	1

Full-time employees	19,767	88
Part-time employees	2,656	12
Non-guaranteed hours employees (casual workers, on-call employees, zero-hours contracts)	0	0

3.4	Provide the gender balance (as a percentage (%) for each contract type in Q3,3, as well as the overall gender breakdown of your direct operations workforce.	F	Mandatory PUBLIC		Table
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Contract type	Female (%) of employees on each contract type	Male (%) of employees on each contract type	Non-binary (%) of employees on each contract type
Indefinite/permanent employees	30	70	0
Fixed-term/temporary employees	43	56	
Full-time employees	27	73	
Part-time employees	64	36	
Non-guaranteed hours employees (casual workers, on-call employees, zero-hours contracts)	0	0	
Total direct operations workforce	31	69	

3.5	Provide the total number and/or percentage (%) of the company's other direct operations workers as a proportion of the total direct operations workforce.	F	Mandatory PUBLIC		Table
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Contract type	Total number of employees on each contract type	Percentage (%) of all direct operations employees on each contract type
Contractors (independent, self-employed)	246	1
Agency workers (e.g. labour agency, recruitment agency workers)	1,139	5
Franchisee workers	0	0
Other workers (e.g. subcontracted service workers, third-party workers)	0	0

3.6	Provide the gender balance (as a percentage ((%) of the figures presented at 3.5) for each contract types.	I	PUBLIC		Table
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Contract type	Female (%) for each contract type	Male (%) for each contract type	Non-binary (%) for each contract type
Contractors (independent, self-employed)	-	-	-
Agency workers (e.g. labour agency, recruitment agency workers)	-	-	-
Franchisee workers	-	-	-
Other workers (e.g. subcontracted service workers, third-party workers)	-	-	-

Note Q3.6: We currently do not hold diversity data for contractors and are therefore, unable to complete the table.

3.7	Scope of disclosure (relates to 3.3-3.6)		Mandatory PUBLIC		Dropdown
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- domestic operations/HQ only
- all significant operating locations
- ≤25% of direct operations workforce
- 26%-50% of direct operations workforce
- 51%-75% of direct operations workforce
- ≥76% of direct operations workforce - selected**
- All direct operations workforce – selected

3.8	Has the proportion of workers on contingent contracts (i.e. fixed-term/temporary employees, contractors, agency workers and/or other workers) increased or decreased substantively over the last reporting period?	I	PUBLIC	Not scored	Yes/No
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No

3.8b	If no, state if there is likely to be a change in the use of contingent workers in the future.	I	PUBLIC	Not scored	150 words
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The proportion of second party contract workers remained fairly steady at 6% in 2024, compared to 7.1% in 2023. We don't have any immediate plans to change use of contingent workers and therefore believe these numbers will remain relatively stable during 2025.

## 4 DIVERSITY AND INCLUSION

Monitoring diversity and inclusion					
Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
4.1	What action has the company taken, or intends to take, to improve diversity and inclusion? State any time-bound diversity and inclusion targets and/or KPIs set and progress achieved, as applicable. Attach or upload documents or policies as relevant.	F		Mandatory PUBLIC	250 word limit

To improve diversity and inclusion, we've implemented DE&I Positive Action Plans. As part of this, we're building a team that reflects the diversity of our communities by 2030 (goal for all company/senior leaders to be 48% women/18% ethnically diverse/20% disability/3% LGBTQ+ and 4% ex-service with 2025 milestones of 40%/16%/10%/3%/3% respectively). Since launching in 2021, we've seen positive progress with improvements of up to 6% including 3% during 2024. We recognise systemic change across business, sector and society does, however, take time. Diversifying senior levels and growing disability representation are particular focus areas for us, as is attracting more women into engineering given our large field team reflects the existing male-dominated market which impacts our overall Group performance that would otherwise be on track. We're therefore recruiting 3,500 apprentices by 2030 with the ambition for 50% of engineering apprentices to be women. 19% of these apprentices are now women verses the gas-safe registered average of 0.3%. Initiatives to build an inclusive team also include diverse shortlists, training for all, and our diverse Shadow Board of colleagues who drive colleague-centric decisions. These advances are good for colleagues and our business. For example, our industry-leading carers leave allowance has estimated benefits of ~£1.8m annually through avoided unplanned absence, presenteeism and recruitment costs. We share DE&I performance with colleagues quarterly and seek feedback to build inclusion via focus groups and engagement surveys. For our efforts, we've ranked in The Times Top 50 Employers for Gender Equality for the fourth consecutive year amongst other recognitions.

Uploads: [Diversity, Respect and Inclusion Policy \(full document\)](#) and [People & Planet Plan Update 2023 \(pages 17-22\)](#).

4.2	Provide the percentage (%) of the company's total direct operations workforce within each age category.	F	Mandatory PUBLIC		Table
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Age group	Percentage (%) of total direct operations workforce
<30 years old	18
30-50 years old	62
>50 years old	20

Note Q4.2: This is percentage of all employees as we do not hold DE&I data for contingent workers.

Provide the percentage (%) of the company's total direct operations workforce by race or ethnicity.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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4.3	Provide the percentage (%) of the company's total direct operations workforce by race or ethnicity.  If the company is legally prohibited from collecting ethnicity data in all of its locations, they can explain that in the online reporting platform in a 150 word text box and the company won't be penalised.	C	PUBLIC		Table
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Race or ethnicity category	Percentage (%) of total direct operations workforce
Ethnic diversity overall	16
White	60
Asian	11
Black	3
Minority ethnic	2
Unknown (blank/prefer not to say)	24

Note Q4.3: We only collect ethnicity data for direct colleagues in the UK, Ireland and US.

4.4	<p>Provide the percentage (%) of persons with disabilities in the company's total direct operations workforce.</p> <p>If the company is legally prohibited from collecting disability data in all of its locations, they can explain that in the online reporting platform in a 150 word text box and the company won't be penalised.</p>	F	PUBLIC		Number
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6%

4.5	<p>Provide the percentage (%) of the company's total direct operations workforce in leadership positions by gender.</p>	F	Mandatory PUBLIC		Table
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Seniority level	Percentage (%) of total direct operations workforce	Female (%) at each seniority level	Male (%) at each seniority level	Non- binary (%) at each seniority level
Board	0.06	46	54	0
Executive committee (senior executives, C-Suite)	0.08	31	69	0
Senior management (any position/individual who directly reports to the Executive committee)	0.55	41	59	0

Provide the percentage (%) of the company's total direct operations workforce in leadership positions by race or ethnicity.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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4.6	<p>Provide the percentage (%) of the company's total direct operations workforce in leadership positions by race or ethnicity.</p> <p>If the company is legally prohibited from collecting ethnicity data in all of its locations, they can explain that in the online reporting platform in a 150 word text box and the company won't be penalised.</p>	C	PUBLIC	Table
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<b>Race or ethnicity category</b>	<b>Board (%)</b>	<b>Executive committee</b> (senior executives, C-Suite) (%)	<b>Senior management</b> (any position/individual who directly reports to the Executive committee) (%)
Ethnic diversity overall	8	13	8
White	92	87	87
Asian	8	13	6
Black	0	0	1
Minority ethnic	0	0	1
Unknown (blank or prefer not to say)	0	0	5

4.7	<p>Provide the percentage (%) of the company's total direct operations workforce with disabilities in leadership positions.</p> <p>If the company is legally prohibited from collecting disability data in all of its locations, they can explain that in the online reporting platform in a 150 word text box and the company won't be penalised.</p>	C	PUBLIC	Table
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<b>Seniority level</b> <i>(Please note row headings cannot be edited nor rows added)</i>	<b>The percentage (%) of the company's total direct operations workforce with disabilities</b>
Board	0
Executive committee (senior executives, C-Suite)	12
Senior management (any position/individual who directly reports to the Executive committee)	13

4.8	What action has the company taken, or intends to take, to increase diversity in leadership positions? Include details on senior leadership training and mentoring opportunities provided and uptake among under-represented demographic groups, as applicable.	C	PUBLIC		250 word limit
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Our DE&I strategy focuses on attracting, promoting and retaining more diverse talent at all levels including senior levels. To reflect the diversity of our communities, we set goals for all company and senior leaders that are aligned with Census data for working populations - targeting 48% women, 18% ethnic diversity, 20% disability, 3% LGBTQ+ and 4% ex-service by 2030. BUs have DE&I Positive Action Plans to achieve the goals with quarterly reviews by the Group Chief People Officer and wider leaders. The SESC are also updated on progress at least three times a year with DE&I going to the Board at least annually. Progress is challenged and plans adjusted if we fall short of expectations. To drive progress, we've implemented initiatives like diverse shortlists and succession planning for senior roles as well as targeted development and secondments. For example, we've ramped up our My Learning Campus training offer for all colleagues looking to advance their career and have run bespoke talent development and mentoring programmes targeted at under-represented groups which include the 30% Club alongside our in-house reverse mentoring programme which pairs senior with junior colleagues. Programme effectiveness is monitored and measured via survey feedback alongside assessment of subsequent progress of participants, with adjustments made where performance could be optimised. Additionally, we see our flexible working practices and carer-friendly policies, empower senior leaders to progress careers whilst balancing personal commitments. Colleagues say increased flexibility and support, has enabled take-up of development opportunities that otherwise wouldn't have been possible.

4.9	Provide the rate of internal hires (as percentage (%) of total internal hires) by gender.	I	PUBLIC		Table
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Gender	Internal hire rate (%)
Female	35
Male	65
Non-binary	0

Provide the rate of internal hires (as percentage (%) of total internal hires) by race or ethnicity.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
4.10	<p>Provide the rate of internal hires (as percentage (%) of total internal hires) by race or ethnicity.</p> <p>If the company is legally prohibited from collecting ethnicity data in all of its locations, they can explain that in the online reporting platform in a 150 word text box and the company won't be penalised.</p>	C	PUBLIC		Table

Race or ethnicity category	Internal hire rate (%)
Ethnic diversity overall	18
White	64
Asian	12
Black	2
Minority ethnic	3
Unknown (blank/prefer not to say)	10

Note Q4.10: We only collect ethnicity data for direct colleagues in the UK, Ireland and US.

4.11	Scope of disclosure (relates to Q4.2-4.8): - what part(s) of the business does this data cover? - if providing ethnicity data, state the source of the ethnicity categories used in Q4.3, Q4.5 and Q4.8 or provide more information on how the categories are defined if using an internal classification system - If the company is restricted from collecting data on employees' age, state which jurisdictions this restriction applies to.	F	PUBLIC	250 word limit
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Data relating to gender and age spans all direct workers across the business and is hosted in our Workday People Management system. Ethnicity data encapsulates information from colleagues on a voluntary basis via self-identification for those based in the UK and Ireland where the majority of our workforce is located as well as in the USA. Ethnicity data is categorised in Workday, with employees selecting their ethnicity from a list of recognised categories from local Census or relevant governmental reporting agency – for example in the UK, we use 20 ethnicity categories aligned to the 2021 Census of England and Wales. We've then aggregated these distinct categories into Asian, Black, Minority Ethnic and White, for reporting purposes. Disability is additionally captured via Workday through colleague self-declaration aligned with the Equality Act 2010 for physical and mental conditions. We don't collect diversity data for contingent workers. It is illegal to collect diversity information like ethnicity and sexual orientation in Denmark.

4.12	Does the company collect any other categories of diversity data, if any? Select all that apply from the drop down list.	F	PUBLIC	Drop down
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- Sexual orientation – selected**
- Gender identity – selected**
- Socio-economic status
- Religion and belief
- Other - selected**

4.12a	For each category selected, provide evidence that this data has been collected.	F	PUBLIC	150 word limit
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2024 tracking relied on self-declaration of direct employees, mainly via Workday. With gender representation, women constituted 31% of all company and 34% of senior leaders against our 2030 gender parity goal (behind). 0.01% chose not to declare their gender. Disability representation at an all company level was 6% and senior levels 5%, against our 2030 goal of 20% (behind). LGBTQ+ at an all company level was 4% (on track) and senior leaders was 2% (on track) versus our 2030 goal of 3%. Ex-service personnel is tracked in the UK and US only and against our 2030 goal of 4%, 2% of all company and senior leaders identified as ex-service (on track). Identification of carers is managed via the carers register by People teams based in the UK only, and in 2024 around 3,000 colleagues identified as a carer. See our [People & Planet Plan Report](#).

4.12b	For any categories not selected in Q4.10, state why this data is not collected and any plans to do so in the future. If all categories were selected in Q4.10, put 'n/a'.	F	PUBLIC	150 word limit
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We focus on diversity characteristics aligned to Census data - data which we can track and advance. Through our goal focused on reflecting the full diversity of the communities we serve in line with Census data for working populations as outlined in Q4.1, having a religiously diverse and socio-economic diverse team should be a natural outcome of our targets so we don't track it. Although there isn't an immediate plan to broaden data captured, we review our approach annually. In the meantime, we'll continue to support all colleagues to thrive. This includes recognising and celebrating all faiths. To help people openly express their religion and beliefs, we provide support such as multi-faith prayer rooms across our sites and help raise awareness of religious events taking place. Likewise, we actively encourage the attraction, promotion and retention of people from different socio-economic backgrounds through targeted recruitment campaigns.

Parental leave

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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4.13	Does the company have a shared parental leave policy that exceeds the statutory minimum requirements?	F	PUBLIC		Yes/No
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Yes

4.13a	If yes, provide a link to or attach the relevant document and give information on uptake of parental leave/the scope of this policy	F	PUBLIC	150 words	
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Our Group Parents and Family Leave Policy sets out colleague entitlements. For example, we offer enhanced maternity leave (52 weeks with full pay for 26 weeks) whilst paternity leave was extended in 2025 to eight weeks full pay. Adoption leave mirrors our maternity policy for the primary adopter, with the paternity policy supporting the non-primary adopter. Up to 5 days paid leave per 12-months is provided for premature birth, miscarriage, adoption appointments and fertility treatment etc. Carers are supported with up to six weeks paid leave when matched with annual leave. We believe our advanced flexible working and industry-leading carers policy, help colleagues better balance work and home life, resulting in fewer people needing parental leave. During 2024, parental leave was used by 31 women (351 days), one man (31 days) and zero non-binary colleagues. Policies are reviewed at least annually to ensure they meet the changing needs of colleagues.

Uploaded: Family Leave Policy (full document available in the WDI portal only).

Discrimination and harassment

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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4.14	Does the company have a public policy on discrimination and harassment, or similar?	F	Mandatory PUBLIC		Yes/No
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Yes

4.14a	Does the company have a public policy on discrimination and harassment, or similar?	F	Mandatory PUBLIC		URL/doc link
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Uploaded: [Diversity, Respect and Inclusion Policy](#) (full document)

4.15	Provide the number of discrimination and harassment incidents reported and resolved in the reporting period.	C	PUBLIC		Table
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<b>Discrimination and harassment incidents reported</b>	<b>Discrimination and harassment incidents resolved</b>
133	117

Note Q4.15: By the end of 2024, 88% of incidents had been resolved in year with the remainder to complete in 2025. Reported and resolved incidents relate to cases raised verses cases upheld.

## 5 WORKFORCE WAGE LEVELS AND PAY GAPS

### Pay gaps and pay ratios

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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5.1	Provide the CEO to median worker pay ratio.	F	Mandatory PUBLIC	150 words	Table
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CEO-median worker pay ratio	Explanation
78:1	Our UK median pay ratio was 78:1, down from 142:1 in 2023. Compared with the average colleague, the CEO pay ratio decreased significantly as 2023 included the 2021 LTIP award which vested that year and reflected year-on-year improvements in business performance alongside exceptional share price growth. In 2024, under the current Remuneration Policy, long-term incentives were delivered to the CEO through the new Restricted Share Plan (RSP) which has a lower overall quantum at 50% of the previous level of LTIP awards. As a large proportion of CEO remuneration is delivered through variable pay in shares, the pay ratio can vary significantly. For calculation, we've used the gender pay gap data (Option B in the Directors' Reporting Regulations), to determine colleagues remuneration packages at the lower, median and upper quartile positions across our UK workforce. This is the most appropriate methodology for us, given varying pension and benefit arrangements.

5.2	Provide the company's median gender pay gap for the company's domestic operations.	I	PUBLIC	150 words	Table
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Gender pay gap (%)	Explanation
13%	Our UK median gender pay gap improved by 1% to 13% during 2023-24. Meanwhile, our mean gap improved by 2% to also hit 13%. Like many companies with roles rooted in STEM, our gap is primarily driven by a greater number of men working in higher paid roles like gas and electrical engineering which make up a significant proportion of our workforce, coupled with more women working in roles such as customer service and administration which are essential but less specialist and therefore lower paid. We're working to reduce the gap but believe it'll take time for the positive impact of our DE&I Action Plan to transform our business, sector and society. We don't have an equal pay issue, demonstrated by a less than 1% median and mean equal pay gap. Our pay gap calculations are based on the mandated UK Gender Pay Gap methodology.

5.3	<p>Provide the company's median ethnicity pay gap for the company's domestic operations.</p> <p>If the company is legally prohibited from collecting ethnicity data in all of its locations, they can explain that in the online reporting platform in a 150 word text box and the company won't be penalised.</p>	C	PUBLIC	150 words	Table
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Ethnicity pay gap (%)	Explanation
7%	<p>Since 2020, we've voluntarily published our UK ethnicity pay gap using the gender pay gap methodology. In 2024, our median gap improved by 4% to 7% whilst our mean increased by 8% to 10%. The gap is driven by an under-representation of ethnic diversity in higher paid roles like engineering, with an over-representation in lower paid but valued jobs like customer service and junior Information Systems roles. Our disclosure is based on 77% of colleagues voluntarily disclosing their ethnicity at the time of calculation. We strive to encourage more colleagues to disclose who they are via #ThisIsMe and #EveryColleagueCounts campaigns run throughout the year, which is helping to secure year-on-year disclosure gains. We want more companies to voluntarily publish their pay gaps so that collective insight and action can be improved. We pay ethnically diverse colleagues fairly, demonstrated by our median equal pay gap of less than 1%.</p>

5.4	<p>What action has the company taken, or intends to take, to reduce pay ratios and gaps? State any KPIs and progress towards these, as applicable.</p>	I	PUBLIC		250 word limit
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We regularly review colleague remuneration to ensure consistency and competitiveness. Our global salary management rules and procedures support fair pay during hiring, promotion, moving roles or in annual salary/bonus reviews. This is underpinned by the Hay Job Evaluation Methodology to deliver robust pay structures, alongside manager training/toolkits/guidelines to remove bias and ensure every colleague is rewarded fairly. We additionally have collective bargaining agreements relating to fair pay and reward for large portions of our workforce. Furthermore, we undertake equal pay audits across key territories to uphold this requirement. Pay gaps by gender and ethnicity in the UK and Ireland, are also reviewed annually. Our DE&I goal to reflect the full diversity of our

communities by 2030 (all company and senior leaders to be 48% women/18% ethnically diverse/20% disability/3% LGBTQ+/4% ex-service, is likewise key to reducing gaps and ratios. We've implemented a DE&I Positive Action Plan to improve representation including via building a pipeline for women in engineering whilst working towards a more inclusive culture where everyone can thrive. Although change takes time, we're starting to see progress. Since first reporting, we've at least halved our median gender and ethnicity pay gaps (gender pay gap: 30% in 2017 to 14% in 2024 and ethnicity pay gap: 14% in 2020 to 7% in 2024 - median used in both cases as it's considered more accurate than the mean given its less affected by outliers). We've also seen an increase of up to 6% against our 2030 DE&I goal since launching in 2021.

Wage levels

5.5	Provide the percentage (%) of female and male employees in the bottom, lower middle, upper middle, and upper pay quartiles.	F	Mandatory PUBLIC		Table
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Pay quartile	% Female	% Male	Non-Binary
Upper	27	73	0
Upper-middle	19	81	0
Lower-middle	25	75	0
Bottom	48	52	0

5.6	What is the percentage (%) of male and female employees, as a total of the direct operations workforce, whose basic salary is equal to or up to 10 per cent higher than the legal minimum wage?	C	PUBLIC		Table
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<b>Female (%)</b> employees, as a total of the direct operations workforce, whose basic salary is equal to the legal minimum wage or just above <i>(Please note row heading can be edited but rows cannot be added)</i>	<b>Male (%)</b> employees, as a total of the direct operations workforce, whose basic salary is equal to the legal minimum wage or just above <i>(Please note row heading can be edited but rows cannot be added)</i>
3.8	3.1

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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5.7	To what extent does the company pay its employees a living wage or above? Select one option from the drop- down list as applicable.	I	PUBLIC		Dropdown
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- Not in any direct operations
- 1 location only – selected**
- More than 1 location
- All global operations

5.8	Provide more detail, including the company's methodology used for determining whether at least a living wage is paid.	I	PUBLIC		250 word limit
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We've a long-standing reputation for being a good employer which includes paying people fairly. In 2015, we became a Living Wage Employer which commits us to pay at least the Real Living Wage, a value set by the UK's Living Wage Foundation, which applies to wages of around 20,000 colleagues based in the UK where the majority of our team is located. We have robust safeguards in place to ensure we pay the Real Living Wage which includes annual reviews of all our pay rates undertaken by the People team. We also use the Hay Job Evaluation Methodology which is designed to promote fairness and consistency in levels, to make sure we pay colleagues fairly across our Group-wide operations. We additionally enter into yearly pay negotiations with our recognised trade unions, enabling a mechanism to share feedback and alternative proposals, which are then put to colleagues to vote. Fair pay practices like this are further supported by a commitment to no zero hour contracts as well as a profit- sharing scheme which shares company success with colleagues annually. Processes and initiatives relating to pay are reviewed regularly throughout the year by our People teams, to ensure we continue to reward colleagues fairly.

5.9	How is the company working to improve wage levels for its contractors and other workers, if not already paying at least a living wage? Include details on the methodology used to assess wage levels.	I	PUBLIC		250 word limit
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We operate fair and transparent reward and recognition processes that are supportive of employment rights, development and fair wages. As a signatory to the Living Wage Foundation, this commits us to pay colleagues and contractors working on our behalf, the Real Living Wage in the UK. We ask suppliers to uphold this commitment to safeguard workers through a Real Living Wage clause embedded in our Responsible Sourcing Policy and in new contract terms and conditions across the UK. This includes the option to require verification that the Real Living Wage is being paid where contractually stipulated, which is managed via ongoing vendor management discussions with contractors. We additionally expect employment agency partners to uphold the same high standard of employment that direct employees receive, including the adoption of the 'Employer Pays Principle', to ensure no one ever has to pay to access temporary or permanent work with us or across our supply chain. For contractors and supply chain workers in countries that don't operate a formal living wage, we're committed to pay at least the minimum wage or a fair representation of the prevailing sector wage, and will comply with the laws on fair wages as well as mandated benefits in the countries where we operate. We engage various organisations such as third-party experts at resource agencies, civil society organisations, trade unions and auditors, to support us as needed. In 2024, we continued to reinforce our ability to uphold the Real Living Wage with refresher training for our Procurement team.

## 6 STABILITY

### Employee turnover rates

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
6.1	Provide the total, involuntary and voluntary employee turnover rates (as a percentage (%)) during the reporting period and for female and male employees.	F	Mandatory PUBLIC		Table

Turnover category	Total turnover rate (%) of all direct operations	Turnover rate (%) for female workers	Turnover rate (%) for male workers	Turnover rate (%) for non-binary workers
Involuntary	3	3	3	0
Voluntary	8	9	8	0

6.2	Provide the number and rate (as a percentage (%) of employee turnover by contract type (if no employees on any one of the contract types, state "n/a").	I	PUBLIC		Table
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Contract type	Total turnover rate (%)  (if no employees on any one of the contract types, state "n/a")
Indefinite/permanent employees	11
Fixed-term/temporary contract employees	50

Changes to employee turnover rates

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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6.3	Describe how the company's turnover rate has changed significantly since the last reporting period and explain any increase or decrease for any particular category of workers. If turnover has remained stable, state this.	I	PUBLIC		150 word limit
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Turnover of employees has continued to reduce, moving from 13% in 2023 to 11% in 2024. For those on fixed-term/temporary contracts, turnover likewise continued to reduce from 63% in 2023 to 50% in 2024. These changes reflect recent years being a period of stability and growth alongside embedding of our employee proposition, where working for us is more than a career. Changes to turnover were fairly evenly spread across the business but mainly related to the UK, where the majority of our workforce is located. Based on CIPD analysis of the UK's Annual Population Survey 2023-24, this compares to an average UK turnover of 34% (27% for those working in electricity, gas or air conditioning supply).

## 7 TRAINING AND DEVELOPMENT

Training and development strategy					
Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
7.1	Describe the company's strategy for developing the skills and capabilities of employees. State the KPIs as applicable.	F	PUBLIC		250 word limit

In 2024, our long-term L&D strategy was launched to drive success throughout the employee lifecycle - from onboarding to excelling in role and beyond. Modular learning is available to all via our My Learning Campus, harnessing in-house training with third-party sources like LinkedIn Learning, spanning voluntary development areas (e.g. leadership), strategic priorities (e.g. net zero) and mandatory matters (e.g. safety). To ensure strong take-up, we've redesigned the L&D Hub and regularly engage People Partners and colleagues, including via internal social media. Longer-term on-the-job training is largely delivered through our British Gas Training Academy, contact centres and Centrica graduate and apprenticeship programmes. Internal/external mentoring

alongside targeted development programmes, help colleagues progress to senior roles whilst all managers complete bespoke learning to ensure consistent and inclusive team management. Everyone including contractors must complete mandatory Our Code training to uphold Centrica's standards. Timings vary across programmes with on-demand and controlled annual intakes. Apprenticeships are funded by the levy whilst additional funding is available for professional qualifications/learning that support business growth. Our approach is shaped by annual skills gap assessments conducted by People teams in consultation with business leaders and horizon scanning. Trade union engagement and survey feedback also inform offerings, focusing on job retention and responsible skills transition. For example to support net zero and customer service excellence, we're cross-skilling engineers to install products like EV charging points and heat pumps, whilst recruiting 3,500 apprentices by 2030. Efficacy is evaluated depending on training type, including NPS/other satisfaction measures, ROI, retention and career progression.

Tracking training and development

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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7.2	Provide the number and/or percentage (%) of employees that participated in regular performance and career development reviews by gender.	I	Mandatory PUBLIC		250 word limit
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Performance review data	Female	Male	Non-binary
The number of performance reviews	1	1	0
Percentage (%) of performance reviews per employee	31	69	0
Percentage (%) of reviews that occurred as a proportion of the agreed number of reviews by management	31	69	0

Note Q7.2: We're currently unable to track performance reviews by gender so we've provided a conservative estimate to support transparency in answering this question. Whilst quarterly reviews are encouraged, at least one annual review is mandatory for year-end calibration. We're confident all colleagues have had at least one review although actual volumes may be higher.

7.3	Provide the average number of hours of training provided to employees (on an FTE basis) by gender.	I	Mandatory PUBLIC		250 word limit
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<b>Gender</b> <i>Please note row headings cannot be edited nor rows added</i>	<b>Average number of hours of training provided to employees (on an FTE basis)</b>
Female	7
Male	14
Non-binary	0

Note Q7.3: Training hours aren't captured in a single system due to various delivery channels. Reporting consequently covers primary learning channels with available data including My Learning Campus and Academy Training (classroom/on-site), whilst excluding contact centre training. Males have greater hours recorded than females due largely to their strong presence in engineering roles and related apprenticeships which have a higher proportion of mandatory and voluntary training verses wider roles. Data reflects FTE for permanent and contract employees. We aim to enhance reporting in future years.

7.4	Provide the average number of hours of training provided to employees (on an FTE basis) by contract type (if no employees on any one of the contract types, state "n/a").	F	PUBLIC		Table
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Contract type	Average number of FTE training hours (if no employees on any one of the contract types, state "n/a")
Indefinite/permanent employees	12
Fixed-term/temporary contract employees	7

Note Q7.4: Reflects scope of training set out in Note Q7.3.

7.5	How does the company measure the impact of its training programmes on business productivity and worker satisfaction?	F	PUBLIC		250 word limit
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Ensuring training delivers meaningful results is core to our L&D strategy. In 2022, we launched My Learning Campus to provide a centralised experience-led platform for online learning. In response to colleague feedback, it offers clearer learning pathways including Powered by Purpose - a digital learning hub designed to embed our Purpose and behaviours whilst strengthening colleague advocacy. Every colleague, regardless of geography, can access the platform to understand and grow their role in our success, with managers able to track completions. Our core learning offerings are assessed for impact on business productivity, colleague satisfaction (NPS), internal promotion rates, ROI (including savings from hiring externally), and return on expectation. Quantitative and qualitative measures track impact, which varies on activity. For example, digital modules frequently include assessments to confirm understanding whilst colleagues can rate modules in real-time, identifying what's working and what needs improvement. Ratings alongside wider insights like take-up, enable us to track effectiveness and inform future enhancements. Programmes like our Aspire and Live Events series are evaluated by participants, facilitators and team leaders. They monitor effectiveness during and after training, providing feedback for continuous improvement. External quality assurance is also sought, with Aspire recognised by the National Quality Awards as a best-in-class development programme. Classroom-based learning follows the Kirkpatrick Model, focusing on post-course evaluation on-the-job. Apprenticeships are fully assessed against national Government standards, with compliance monitored in real-time. Apprentices also give interview feedback at key development stages and upon qualification, helping refine future learning to ensure its inclusive and effective.

7.6	Describe the risks, impacts and opportunities that may affect the company's workforce as a result of the transition to a climate-neutral economy?	I	PUBLIC		250 word limit
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Delivering net zero requires a shift in skills which creates impacts, risks and opportunities (IROs). Like many companies, it's too early to know the full effect the energy transition may have on colleagues. This will become clearer when society moves more fully away from gas production and use in the mid-to-late 2030s. Some jobs will inevitably be retired, which is a risk managed through our commitment to address skills gaps internally as we guard against job losses by cross-skilling, retraining and redeploying colleagues wherever possible into new opportunities generated by the energy transition. For example, the demand for low carbon products has already stimulated an ambition for 3,000 of our British Gas and Bord Gáis Energy engineers in the UK and Ireland to have green skills by 2030 whilst Centrica Business Solutions and Hive are expanding to support the deployment of low carbon technologies across the UK, Europe and USA which offers growth for new and existing colleagues. Communities hosting fossil fuel assets can also benefit as they transition to low carbon infrastructure. Through our existing plans to transform Easington into a hydrogen production site, Rough into a hydrogen store and Morecambe into a CCS facility for instance, we expect to safeguard jobs and generate ~6,500 new ones. IROs were identified through a double materiality assessment which considers human rights. As technologies, policy and strategy evolves, so too will our analysis. Our approach is shaped by input from colleagues, trade unions and trade bodies via meetings, consultation and wider insight.

7.7	Explain the action has the company taken, or intends to take, to ensure workers are protected against risks and can access opportunities resulting from the transition to a climate-neutral economy.	I	PUBLIC		250 word limit
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We're focused on minimising risks and optimising opportunities across our workforce. As we transition from fossil fuels to lower carbon assets, services and solutions, we're seeking to train and reskill through our world-class training academies to help close skills gaps and maintain comparable terms and benefits. We've already begun cross-skilling engineers to install heat pumps and EV charging points to meet demand which is expected to rise. Moreover, we're unlocking the talent of under-represented groups to help us get to net zero. That's why we want all of our team to reflect the full diversity of the communities we serve, with goals aligned to Census data for working populations. Meanwhile our award-winning apprenticeships are helping more women into engineering whilst supporting social mobility by not dropping pay for internal candidates whilst they train. Where job losses may be unavoidable, we'll offer support through initiatives like counselling, job coaching and early retirement plans. Plans take into consideration human rights impacts as well as the views of colleagues and trade unions, including via our Joint Council which enables Centrica and union leaders to collaborate on key issues. We've also engaged expert organisations like BiTC and CA100+

to guide our approach. We're starting to see positive results with more engineers being cross-skilled and women now making up 19% of our engineering apprentices compared to the 0.3% national gas engineer average, as we work towards our ambition for gender parity by 2030. As the climate transition gets further underway, we'll continue strengthening our approach.

7.8	Provide the number and/or percentage (%) of employees that have been reskilled, redeployed or had their employment ended as a result of the transition to a climate-neutral economy.	C	PUBLIC		250 word limit
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Treatment of employees	Number of employees	Percentages (%) of employees
Employees that have been reskilled	1,900	9
Employees that have been redeployed	-	-
Employees whose employment has ended	-	-

Note Q7.8: As part of our updated Climate Transition Plan 2024, we set a new ambition for 3,000 engineers to have green skills by 2030. This includes activities like being able to install smart meters, EV charging points and heat pumps. In 2025, we started tracking against this ambition and as part of our efforts to be as transparent as possible, we've disclosed our progress in the table whilst noting that this figure may evolve as the year completes. We do not have a system that tracks wider reskilling, redeployment or redundancy of workers related to the energy transition but we believe that current activities do not have a material impact. As the energy transition deepens, we'll consider how we may be able to capture broader information in future years.

7.9	Describe any workforce surveillance measures used to monitor workers, and how the company ensures this does not have a disproportionate impact on workers' right to privacy. If the company does not conduct any form of workforce surveillance, state this.	I	PUBLIC		250 word limit
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We respect the right to privacy and only use surveillance when it's needed to protect colleagues, customers and businesses in line with law – such as upholding regulatory requirements, preserving evidence for legal proceedings or guarding against malicious or unlawful intent. Monitoring spans activities like calls with customers and suppliers/partners, geo-tracking engineer fleet vehicles, site access, H&S records and computer/phone use. Privacy rights are safeguarded through internal policies such as our Data Protection Standard, Data Governance Standard, Information Security Policy and Acceptable Use Policy, all of which ensure privacy safeguards are built into the creation and deployment of surveillance. We're fully transparent with colleagues about surveillance and why it's needed via tailored communications. In line with regulatory obligations, we'll only store information for as long as needed, whilst ensuring robust safeguards for specific access by personnel managing the issue – whether that's Group Security, Cyber Security, H&S or others. When introducing or enhancing surveillance, the respective business team and Data Privacy Team carefully assess requirements by reviewing scope, context and whether or not it's likely to result in a high risk to the rights and freedoms of individuals. To further safeguard privacy, monitoring is often focused on wider workforce populations rather than individuals. A governance framework supplements this, with a Group DPO as the final point of escalation for privacy concerns alongside a central Privacy Team, who are supported by a network of BU Privacy Champions. As needed, we engage colleagues and trade unions to seek views and shape implementation plans.

7.10	Provide the number and/or percentage (%) of employees that have been reskilled, redeployed or had their employment ended as a result of automation.	C	PUBLIC		Table
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Treatment of employees	Number of employees	Percentages (%) of employees
Employees that have been reskilled	0	0
Employees that have been redeployed	0	0
Employees whose employment has ended	0	0

Note Q7.10: We don't currently track KPIs linked to AI and the workforce. Due to the nature of AI technology implemented, however, we believe that colleagues haven't been adversely impacted by reskilling, redeployment or redundancy related to this area. AI automations generally enable colleagues to free up their time to focus on higher value work rather than requiring a fundamental change in role. For example, we automated the way smart meters are commissioned by creating an AI solution that allows engineers to self-serve PIN codes to commission the meters. This means the engineer no longer needs to spend time on the phone waiting for the PIN to be generated because they can now do it themselves. This benefits the engineer as they can use the time to work on activities that are more interesting for them, whilst unlocking additional capacity to serve more customers and provide a better experience.

7.11	Describe how the company uses artificial intelligence in workforce management, including in recruitment, performance management and workplace decisions.	C	PUBLIC		250 word limit
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We're committed to the responsible application of AI across the company which is guided by ethics, values and legal standards. Our strategy identifies ten themes supporting strategic goals which include workforce management. Across career development and performance for example, we harness machine learning and GenAI for skills assessment, tailored learning and training simulations. Other applications of AI include reporting for expenses and attrition risk, as well as support assistants for People policies to help colleagues efficiently find the information they need. The tools we use therefore assist rather than replace colleagues. We're acutely aware of the risks relating to AI adoption, such as concerns relating to bias and privacy. We seek to effectively manage and mitigate risks through human oversight, privacy impact assessments, GDPR compliance and clear AI policies that robustly govern our approach as set out in Our Code of conduct and acceptable use policy amongst others. Oversight is provided by our Director of AI and Digital Technology Services, whilst relevant teams may further assist in assessing and managing any potential or actual human rights impacts relating to AI. For example, this may involve teams such as Privacy, Ethics and Compliance and Risk. Authorised AI is deployed with experienced partners like Microsoft and AWS to reduce risk. We maintain open dialogue with trade unions and colleagues to ensure transparent and positive AI adoption across the organisation.

## 8. HEALTH, SAFETY AND WELLBEING

Occupational health and safety

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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8.1	Describe the company's strategy for identifying and managing health and safety risks and hazards in the workplace, including through audits, training and the provision of personal protective equipment. State the KPIs as applicable.	F	Mandatory PUBLIC		250 word limit
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We prioritise controls and monitoring to ensure a strong health and safety (H&S) culture across operations, including physical and psychological wellbeing. H&S risks are managed through Group-wide policies, standards, operating procedures and risk assessments aligned with legal requirements and ILO standards across jurisdictions – all of which are accessible in appropriate languages and formats. Our H&S assurance team periodically assesses and updates Group standards based on regulatory changes, third-party audit findings that typically span operations, systems and performance insights to ensure they remain effective. Safe systems of work are implemented including permits, pre-task checks, DSE assessments and PPE provision. All workers receive HSE inductions whilst higher risk roles receive job-specific training alongside risk assessment training. Higher risk roles include field engineers who collectively drive millions of miles a year to service and repair homes/businesses, alongside workers operating and maintaining energy assets. Managers are active in reinforcing a strong safety culture, delivering inspections and leading Toolbox Talks to share learnings/concerns. Adjustments are made for injured, ill or vulnerable workers, including modified duties or phased returns. Each business maintains its own H&S management system, risk register and controls, supported by H&S professionals who identify new hazards and conduct first-line-of-defence inspections. Observations, incidents and actions are recorded in a central system with investigations and corrective actions agreed/tracked. Monthly KPI's like total recordable injury frequency rate (TRIFR) and action plans are reviewed by business divisions and the CLT, ensuring appropriate oversight and challenge. Lessons from significant incidents are shared across the Group to prevent recurrence.

8.2	Does the company consult with workers and/or worker representative bodies when developing and evaluating health and safety policies and practices?	F	PUBLIC		Yes/No
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Yes

8.2a	If yes, provide more details	F	PUBLIC	Rule 3 (1 point for Yes)	250 word limit
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We regularly seek the views of workers and their representatives because we understand that collaboration is vital to keep colleagues safe. Trade unions play a particularly important role in helping us shape and update our approach to H&S policies and procedures. In the UK, our workforce are typically represented by unions such as the GMB, Unison, Unite and Prospect, who we engage on safety matters throughout the year. Trade union safety representatives additionally receive H&S reports, observe investigations and help conduct inspections whilst identifying risk areas and contributing to procedural improvements. Alongside union engagement, we undertake wider direct colleague engagement. As part of the ongoing maintenance of management systems, risk assessments and controls, H&S professionals regularly engage operational teams to ensure process and practices remain robust. As needed, employee consultations are likewise employed, to ensure feedback can be used to optimise changes to policies and procedures. In some cases, we may run trials to test effectiveness of changes, enabling fine-tuning of proposals with colleagues. Further feedback channels via annual campaigns like Stop for Safety provide us with opportunities to improve our safety culture, whilst surveys and focus groups enable our award-winning wellbeing support suite to continuously evolve to better meet the preventative and remedial needs of colleagues. Colleagues are additionally encouraged to report H&S observations and near-misses in real-time as well as support associated investigations, enabling them to play an active role in the prevention of re-occurrence.

Provide the total number and/or rate of work-related injuries or ill health (excluding fatalities), as well as the change in the number of incidents since the last reporting period, for employees for each of the company's significant operating locations.					
Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria

8.3	Provide the total number and/or rate of recordable incidents of ill health or work-related injuries or (excluding fatalities), as well as the change in the number of incidents since the last reporting period, for employees for each of the company's significant operating locations.	F	Mandatory PUBLIC		Table
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Significant operating location	Number of incidents of ill health or work-related injuries (excluding fatalities)	Change in the number of incidents since the last reporting period	Rate (%)	How rate is calculated (e.g. based on either 200,000 or 1,000,000 hours worked) [not scored]
Group/Global	167	-20	0.63	Based on 200,000 hours worked
UK	159	-17	0.65	Based on 200,000 hours worked
Europe	8	-3	0.44	Based on 200,000 hours worked
USA	0	0	0	Based on 200,000 hours worked

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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8.4	Provide the total number and/or rate of fatalities as a result of work-related injury, as well as the change in the number of fatalities since the last reporting period, for employees for each of the company's significant operating locations	F	Mandatory PUBLIC	Table	
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Significant operating location	Number of fatalities as a result of work-related injury	Change in the number of incidents since the last reporting period	Rate (%)	How rate is calculated (e.g. based on either 200,000 or 1,000,000 hours worked) [not scored]
Group/Global	0	0	0	Based on 200,000 hours worked
UK	0	0	0	Based on 200,000 hours worked

Europe	0	0	0	Based on 200,000 hours worked
USA	0	0	0	Based on 200,000 hours worked

Provide the total number and/or rate of work-related injuries or ill health (excluding fatalities), as well as the change in the number of incidents since the last reporting period, for other direct operations workers for each of the company's significant operating locations.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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8.5	Provide the total number and/or rate of recordable incidents of ill health or work-related injuries (excluding fatalities), as well as the change in the number of incidents since the last reporting period, for non-employee direct operations workers for each of the company's significant operating locations.	F	PUBLIC		Table
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Significant operating location	Number of incidents of ill health or work-related injuries for non-employee direct operations workers (excluding fatalities)	Change in the number of incidents since the last reporting period	Rate (%)	How rate is calculated (e.g. based on either 200,000 or 1,000,000 hours worked) [not scored]
Group/Global	35	+3	0.75	Based on 200,000 hours worked
UK	30	+1	0.74	Based on 200,000 hours worked
Europe	5	+2	0.80	Based on 200,000 hours worked

USA	0	0	0	Based on 200,000 hours worked
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Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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8.6	Provide the total number and/or rate of fatalities as a result of work-related injury, as well as the change in the number of incidents since the last reporting period, for non-employee direct operations workers for each of the company's significant operating locations.	F	PUBLIC		Table
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Significant operating location	Number of fatalities as a result of work-related injury for non-employee direct operations workers	Change in the number of incidents since the last reporting period	Rate (%)	How rate is calculated <i>(e.g. based on either 200,000 or 1,000,000 hours worked)</i>  <i>[not scored]</i>
Group/Global	0	0	0	Based on 200,000 hours worked
UK	0	0	0	Based on 200,000 hours worked
Europe	0	0	0	Based on 200,000 hours worked
USA	0	0	0	Based on 200,000 hours worked

8.7	Scope of disclosure (relates to Q8.5-8.6)	PUBLIC	Not scored	Dropdown
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- Contractors (e.g. independent, self-employed) – selected**
- Agency workers (e.g. labour agency, recruitment agency workers) – selected**
- Franchisee workers – selected**
- Third party on site workers (e.g. subcontracted service workers, third-party contract workers) – selected**

Mental health risks and safeguarding

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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8.8	Does the company monitor and report on employee mental health and well-being, such as sick days due to mental health?	F	PUBLIC		Yes/No
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Yes

8.8a	If yes, provide more details	F	PUBLIC		250 words
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Looking after colleague psychological, emotional and social wellbeing is a top priority. We therefore have a comprehensive mental health and wellbeing programme and run campaigns encouraging colleagues to access support and speak up if they need help, or take time out when needed. Absence is recorded in our Workday People management system which enables colleagues to seek further support via our MyHealth service. Mental health absence is closely monitored by business leaders in real-time through Workday. Additionally, a detailed MyHealth report with key insights and trends to identify higher risk age groups, genders, roles or societal factors, together with associated actions that can be taken to better support colleagues, is shared quarterly with business leaders, People Partners and safety teams. KPIs tracked within the report are comprehensive and include the number of incidence, types of wellbeing incidence reported, improvement in conditions, return to work rates, NPS and ROI. Using this data, we can identify trends and predictions as well as structure our risk-based wellbeing programme to better target support in the areas colleagues need most, such as emotional wellbeing, sleep, nutrition, exercise and financial wellbeing. It also helps us

ensure signposting to areas of particular need, are optimised. Metrics are shared with trade unions via meetings. We additionally publish our annual Wellbeing Statement that discloses our approach and performance on wellbeing, earning us a Tier 1 leadership position in the CCLA’s external mental health benchmark for the fourth consecutive year.

8.9	Does the company integrate mental health safeguarding into job design and workplace conditions?	C	PUBLIC		Yes/No
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Yes

8.9a	If yes, provide more details	C	PUBLIC		250 words
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We design roles with physical and mental wellbeing in mind, guided by ‘good work’ principles. Job design considers fair hours and flexible work patterns aligned with national and international standards. Inclusive recruitment practices support current/prospective colleagues, including most office-based roles being advertised as flexible or hybrid, diverse shortlists and interview panels being in place and virtual or in-person interview options. Once hired, colleagues can benefit from healthy working environments with health and workplace assessments ensuring they’ve the right tools, adjustments and ergonomic setups, with access to nutritious food, fitness incentives and meaningful volunteering and/or development opportunities. To ensure colleagues are healthy and engaged in their role, regular one-to-ones and performance reviews with managers enable matters like workload and wellbeing to be discussed alongside potential changes in duties/schedules, which may be driven by accessibility needs, care responsibilities, professional development or retirement planning. Colleagues can access extra support via diversity networks and the mental health suite of support. Meanwhile, opportunities exist to shape more colleague-centric working practices via forums like the quarterly engagement survey, focus groups, Shadow Board, collective consultation and trade unions. During 2024 for example, we engaged colleagues on various topics - from ways of working and organisational changes, to parental leave and engagement levels. We monitor implemented changes through direct feedback as well as KPIs like colleague engagement, absence and retention. Managers are empowered to support their team through dedicated mental health training for leaders as well as toolkits targeted at helping colleagues through different life and career stages.

8.10	Identify the company’s operating locations, business lines and workforce demographics where physical and/or mental health and safety risks and injuries are reported to be higher, and any processes in place to address problem areas.	F	PUBLIC		250 word limit
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Physical and mental health incidence are evenly distributed across jurisdictions, with slightly higher rates in the UK where most of our workforce is based. This may reflect our mature culture of openness, supported by proactive awareness campaigns and leadership role-modelling. Some role-based trends are evident, with incidence higher in engineering teams where the physical nature of the job increases musculoskeletal occurrence. This contributes to the trend we see of men aged 40-49, accounting for the highest number of lost hours in this area. Mental health concerns, particularly anxiety and depression, likewise span our workforce but appear more common in office-based populations with women aged 40-49 accounting for the highest number of lost hours in this area. We see underactivity, obesity and sleep deprivation underpin occurrence whilst absence is highest within 0-3 years of employment. To support colleagues and reduce incidence, we promote early intervention and holistic wellbeing, including sleep, nutrition, and stress management. Our internal MyHealth annual report provides recommendations for leaders to help at-risk individuals. We've also strengthened our award-winning support ecosystem in recent years with a 24/7 helpline, wellbeing app, over 120+ Mental Health First Aiders, GP24 and a company-funded Healthcare Plan to fast-track assessment and treatment. Wellbeing campaigns educate colleagues on mental health and the importance of daily maintenance whilst initiatives including Time Out for Safety team talks, safety training and updates to processes and procedures, continue to support a healthier workplace to drive down slips, trips and musculoskeletal occurrence which helps reduce our TRIFR.

Worker wellbeing

Question Number	Question Text	Question Tier	Privacy setting of Answer	Scoring Information	Answer Criteria
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8.11	Does the company offer a health and well-being programme?	I	Mandatory PUBLIC		Yes/No
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Yes

8.11a	If yes, provide an example of how the company has improved workers' wellbeing and how the company can evidence this.	I	Mandatory PUBLIC		150 words
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Our UK wellbeing service is primarily delivered through MyHealth, providing support across physical and mental health needs. Colleagues can access specialists for mental health, musculoskeletal issues, nutrition, sleep, and exercise. MyHealth includes a 24/7 MyCare psychological support phone line, a manager advice line, access to Silvercloud CBT services and proactive support for both in-work and time-off scenarios. In 2024, over 81,700 positive interventions were made (+2.13% vs 2023), with 64% of users returning to work earlier than clinical norms, saving an estimated £7.7m in reduced absence. 99% of supported colleagues reported no further absence during the year and MyHealth achieved an NPS of +88 (+2 vs 2023). We also offer Onehub Wellbeing, an app providing access to meditation, breathwork, deskercise and other wellbeing resources. Our wellbeing support contributed to a top quartile engagement score of 8.1/10 (+0.4 vs 2023), reflecting our commitment to proactive health interventions and colleague wellbeing.

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
8.12	What measures does the company have in place to ensure that workers who are unwell take sick leave, and other necessary leave, and are protected economically if they need to do so?	F	Mandatory PUBLIC		500 word limit

Our sick leave policy complies with and in some cases exceeds local legal requirements across every country we operate in. Our Attendance Management Policy and Wellbeing Policy are clear, fair and transparent, ensuring colleagues are financially protected and won't be penalised for absence exceeding local requirements. A generous package of enhanced sick pay is available whereby colleagues with over two years' service receive up to 13 weeks full sick pay and 39 weeks at 67% (those with less service can access 10 weeks full pay within a rolling 12-month period, followed by statutory pay). Sick leave is logged in our Workday People management system, formalising the process and enabling access to further support. Sickness absences are referred to our MyHealth Case Management team to triage within 24-48 hours. Depending on the case, further interventions may be triggered via our MyHealth service to ensure appropriate support is provided where it's needed. Line managers play a key role in supporting recovery, holding guided conversations at critical stages of absence, to monitor wellbeing and plan a suitable return to work. This may include a phased return to avoid overwhelming colleagues too soon. We also offer other types of leave where we know people may need time off to support their health and wellbeing. These include bereavement, adoption, fertility and gender affirming leave, as well as carers leave which provides industry-leading support of up to six weeks paid leave when matched with annual leave to help colleagues better balance work with caring responsibilities. For those needing to isolate, such as with COVID-19 during the peak of the pandemic, we amended policies to ensure related absence didn't negatively impact pay and we'll continue

to adapt policies as needed to ensure they remain fit for purpose. Our Group income protection scheme also covers 67% of basic annual salary for eligible colleagues with 52 weeks continuous absence due to injury or illness, offering peace of mind and allowing colleagues to focus on recovery. To further support financial wellbeing, free education and money management tools, enhanced benefits and discounts are offered. Our family leave policies and wellbeing suite are reviewed at least annually to ensure they continue to promote fairness and work-life balance.

8.13	Which workers are covered? Select all that apply from the drop-down list.	F	Mandatory PUBLIC		Dropdown
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- Indefinite/Permanent employees – selected
- Fixed-term/temporary employees – selected
- Non-guaranteed hours employees (e.g. casual workers, on-call employees, zero-hours contracts/on-call employees)
- Contractors (e.g. independent, self-employed)
- Agency workers (e.g. labour agency, recruitment agency workers)
- Franchisee workers
- Third party on site workers (e.g. subcontracted service workers, third-party contract workers)

8.14	Does the company enable workers to work flexibly?	I	PUBLIC		Yes/No
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Yes

8.14a	If yes, describe the initiatives the company has in place to enable workers to work flexibly. Include details on which workers these initiatives apply to and levels of uptake.	I	PUBLIC		150 words
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We embrace flexible working. FlexFirst allows office-based colleagues to combine home and office working with flexible hours. Seasonal Hours for call centre colleagues enables us to meet winter demand in exchange for more time off in summer, whilst providing shift preferences alongside 4/5-day working weeks on a rotational basis. There’s also been an encouraging uptake of our Short Term International Remote Working Policy, whereby colleagues can request working up to 20 days per year from a non-home/office location. Additionally, 3,700+ colleagues used flexible benefits to gain extra annual holiday. We provide guides and toolkits for managers and colleagues to optimise flexible working and primarily monitor feedback through engagement surveys.

This ensures flexibility continues to support colleague wellbeing and their ability to access development opportunities that may otherwise not be possible, whilst meeting business needs. Given our flexible approach, we're unable to report the percentage of employees benefitting from flexible working.

## 9 WORKER VOICE AND REPRESENTATION

### Freedom of association and collective bargaining

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
9.1	Describe the company's process for consulting with workers, their representative bodies and trade unions, as applicable, and other steps to secure workers' rights to freedom of association and collective bargaining.	F	PUBLIC		250 word limit

Working in partnership with trade unions Group-wide, is vital to achieving business goals that benefit colleagues, customers and wider society. In 2024, we upheld the right to union membership, with ~35% of colleagues being members. We continued to support employed trade union representatives with facilities time and time-off to maintain open dialogue. Meetings, both in-person and virtual, were held alongside accessible consultations and negotiations on statutory and voluntary issues on a local and national basis. For example, we've six UK collective bargaining units, each with their own collective arrangements/recognition agreements. Under these, we hold national and local councils which meet regularly to consult on key matters. The Centrica Joint Council, now in its fifth year, also meets bi-annually and brings together our Group Chief Executive, members of senior leadership teams and National Energy Officers from recognised unions. We additionally undertake engagement via the Future Energy Skills Programme which is co-chaired by our Chief Executive and the General Secretary of the GMB Union, with support from other recognised unions including UNISON, Unite the Union, and Prospect, to discuss skill development/transition. Engagement across channels span wider topics like ways of working, fair pay agreements and proposed large-scale organisational changes including contractual changes and redundancy mitigation. These discussions are pivotal in helping shape outcomes that enable us to energise a greener, fairer future. Outcomes from engagements are shared with colleagues in various ways such as via union representatives, National Energy Officers, townhalls led by leadership, meetings with line managers and intranet updates.

9.2	Provide the percentage (%) of employees covered by collective bargaining agreements for all locations in the direct operations	F	Mandatory PUBLIC		
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75%

9.3	Scope of disclosure (relates to Q9.2)		Mandatory PUBLIC		Dropdown
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- Domestic operations/HQ only
- All significant operating locations
- ≤25% of direct operations workforce
- 26%-50% of direct operations workforce
- 51%-75% of direct operations workforce
- ≥76% of direct operations workforce – selected**
- All direct operations workforce

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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9.4	Provide the percentage (%) of employees covered by collective bargaining agreements by each of the company's significant operating locations.	I	PUBLIC		Table
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Significant operating location	Percentage (%) of employees in each location covered by collective bargaining agreements
Group/Global	75
UK	78
Europe	35

USA	-
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Note Q9.4: We no longer source USA data following divestment of Direct Energy in January 2021, due to low colleague populations now in this location during 2024. Europe calculation is based on collective bargaining in Ireland only.

9.5	How does the company secure the rights of other direct operations workers to collective bargaining?	F	PUBLIC		250 word limit
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We support all workers to further their employment interests and voice by having freedom of association and collective bargaining, or alternative means to facilitate this. This commitment is enshrined in Our Code and backed up by our membership of the United Nations Global Compact as well as our commitment to the ILO Core Conventions and UN Guiding Principles on Business and Human Rights. Third party workers are enabled to experience these same rights as our own employees through clauses on collective rights in supplier contracts which are set out in our Responsible Sourcing Policy. Those who uphold this right and cascade them within their own supply chains, are incentivised to do so with the potential award or renewal of a contract. Upholding this is one of the key principles for being able to do business with us. Compliance is monitored via our risk processes for supplier onboarding which includes running a detailed analysis of labour practice which is managed by Procurement Managers. If categorised as higher risk, we undertake further review processes such as conducting a site inspection or remote worker survey, with relevant questions that test whether the right to collective bargaining is in place. Any breach of our policy may result in termination of our contractual relationship with the supplier or working together to raise standards. Further information is available in [Our Code](#) and [Responsible Sourcing Policy](#).

9.6	Has the company identified any risks or restrictions to employees' right to freedom of association or collective bargaining in any of its direct operations?	I	PUBLIC		Yes/No
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No

9.6b	If no, provide an example of action taken to prevent risks or restrictions, including through engagement with workers and/or worker representative bodies, as applicable	I	PUBLIC		250 word count
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We believe our processes are sufficient in protecting the right to freedom of association and collective bargaining across direct and indirect operations, with no risks or restrictions identified via risk processes. For example, Our Code sets out our commitment to uphold collective bargaining which we do through a joint working framework with trade unions, enabling us to strive towards productive engagements to achieve positive outcomes for all. Through active participation, we role model our support and raise awareness of opportunities for colleagues to get involved and have their voice heard via a range of channels including townhalls, new starter inductions, leadership updates, consultations and more. Colleagues are made aware of this right via Our Code annual refresher training which everyone must complete, embrace and uphold which secured a 99% completion rate in 2024. Freedom of association and collective bargaining is also rigorously protected in our supply chain. This stipulation forms a core part of ongoing tender and onboarding due diligence, so any supplier who doesn't uphold these rights can't progress through tendering. If concerns arise that collective bargaining and freedom of association aren't being upheld or if we engage suppliers in higher risk jurisdictions, we'll conduct further rolling audits to gain a better understanding. Any contravention identified will either result in collaboration to raise standards or ending our partnership. Should anyone within/beyond the company have concerns that rights aren't being honoured, an anonymous 24/7 Speak Up online and phone-based helpline is available, enabling us to investigate and take action.

Worker voice

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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9.7	Describe the mechanism(s) for enabling workers' participation in corporate decision making, such as worker representation on the Board, having a Non-Executive Director with responsibility for employee engagement, town hall meetings etc.	F	PUBLIC		250 word limit
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Colleague participation in corporate decision-making strengthens our culture and business success. Board members share responsibility for engaging colleagues and acting on their behalf. That’s why during 2024, they undertook site visits to improve understanding of operations and worker experience. This is supported by our Shadow Board of diverse colleagues serving a 24-month term, who regularly meet with leaders to challenge executive-thinking and promote colleague-centric decision-making. They inputted on many issues during 2024 including workplace strategy, bringing our Purpose to life and launching the #EveryColleagueCounts campaign to build inclusion. Shadow Board members now also sponsor our employee-led diversity networks, enabling better representation of employee needs. This supplements our direct engagement with the networks to improve support for all colleagues. Additionally, leader-led townhalls hosted throughout the year were launched a few years ago in response to colleagues telling us that they wanted to feel more connected with leaders and company strategy. Townhalls continue to be an important way to achieve this as well as be a forum to ask questions and help shape decision-making. All of these activities are underpinned by our quarterly engagement survey, whereby feedback directly informs workforce action plans at a Group, business and team level. Through these mechanisms, we’ve been able to better serve colleagues – an example of which includes launching enhanced parental leave following network and trade union engagement during 2024. Engagement channels are reviewed at least annually to ensure they remain effective, including quarterly review of engagement survey participation rates and Shadow Board progress.

9.8	How does the company obtain worker feedback? Provide the percentage (%) of employees who participated in the company's most recent engagement survey and the level of satisfaction indicated	F	Mandatory PUBLIC		250 word limit
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Over the last few years, colleagues have faced challenging times with COVID-19 and the cost-of-living crisis. We’ve endeavored to support them by understanding what we’re doing well and where we can improve. Our Group-wide quarterly engagement survey is fundamental to achieving this as it provides regular insight across a variety of workforce areas which enables us to take action. Engagement feedback is split by business, department and team, and shared with leaders and managers for discussion at team meetings to deliver more tailored action plans. During 2023-24, our engagement score improved by 0.4 points to 8.1/10 which is top quartile for our industry and was based on a participation rate of 82%. Gains were driven by us acting on feedback as we sought to improve recognition and investment in colleagues, provide a safe and inclusive place to work, and galvanise a stronger belief in our new Purpose and strategy. These are areas we’ll continue to focus on in 2025 in our quest to maintain top quartile performance. At Group-level, employee feedback has been the key driver in continuing to run frequent townhalls hosted by the Group Chief Executive and Managing Directors from across the business, to ensure a greater understanding of our Purpose and company strategy, whilst fostering a deeper connection between leadership and colleagues. Feedback is additionally sought through wider forums like focus groups, working groups or additional surveys for matters like workforce strategy, or via employee diversity networks and the Shadow Board for inclusion matters.

9.9	Provide one example of how workers have influenced decision making on an issue of substance in the reporting period.	C	PUBLIC		250 word limit
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During 2024, we continued listening to colleagues and focused on building a more inclusive workplace. Colleagues helped shape our DE&I Positive Action Plans to support progress towards our 2030 goal of reflecting the full diversity of our communities. We partnered with our Diverse-ability Network to launch the Great Minds module, offering enhanced education and tools to better support neurodiverse colleagues. Following colleague feedback, we additionally collaborated with our Working Parents Network and trade unions to increase fully paid paternity leave from two to eight weeks. We also introduced our Transgender Inclusion Policy, developed with the LGBTQ+ Network and trade unions, to foster a safe and inclusive workplace that affirms all identities. The policy is a first-of-its-kind in our sector and won 'Best Network Initiative of the Year' at the Employee Network Awards. In response to ongoing cost-of-living concerns, we continued to actively promote our holistic wellbeing approach to ensure we could be on hand to support colleagues, including via campaigns to raise awareness of our company-funded healthcare plan, wellbeing app, and access to 120+ Mental Health First Aiders. We also offered discounts such as our energy allowance (15% off the price cap) for employees that are British Gas customers alongside market-competitive pay rises for parts of our business. To further grow belonging and trust, we launched the #EveryColleagueCounts campaign. These actions contributed to a more inclusive and supportive workplace, reflected in our top quartile engagement score at an overall level as well as for DE&I specifically.

## 10 GRIEVANCE MECHANISMS

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
Grievance mechanisms					

10.1	Provide details of the channel(s)/mechanism(s) through which workers can raise complaints or concerns, including how these operate and how workers were consulted on the design of the mechanism(s).	I	Mandatory PUBLIC		250 word limit
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Our Group Grievance Policy outlines the process for colleagues to raise concerns. Colleagues are encouraged to report any malpractice or grievance such as discrimination and wider human rights abuses to their line manager, senior manager, People team or via the independent Speak Up phone and online helpline which allows for anonymous reporting. For interpersonal issues raised, the Employee Relations Team offers grievance mediation through trained internal mediators as an informal way to address concerns and seek resolution. If mediation is unsuccessful, the formal grievance process is initiated. An independent leader is subsequently appointed to investigate the grievance raised, interviewing relevant parties and reviewing associated documentation. Outcomes are typically provided in writing with details shared on the appeals process. For wider issues raised via Speak Up and depending on the subject matter, the Ethics and Compliance team or Employee Relations team support the independent investigation. Both teams store outcomes confidentially and monitor volumes and trends via KPIs like reports per 100 employees against external benchmarks. They also seek to incorporate learning into business strategy to prevent recurrence, which often involves collaboration between People and/or Ethics and Compliance teams alongside business leaders, to improve work practices. Both grievance and Speak Up processes follow best practice HR protocols and are further shaped through trade union and colleague engagement.

10.2	Which workers can access the channel(s)/mechanism(s) identified in Q10.1? Select all that apply from the drop-down list.	I	PUBLIC		Yes/No
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- **Employees - Selected**
- **Non-employee direct operations workers – Selected**
- **Value chain workers – Selected**
- **Other - Selected**

10.2a	For every group of workers covered, provide more details (see guidance for what details to include).	I	PUBLIC		250 words
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We're committed to acting fairly and with integrity, ensuring everyone can raise concerns safely. Our grievance policy, focused on Group-wide employees and contractors, encourages concerns to be raised directly with local leaders or People teams initially, enabling informal resolution. Grievances and concerns around contraventions of Our Code involving illegal or unethical behaviour, can be reported via the independent Speak Up helpline - accessible through our intranet and external website. Speak Up supports open or anonymous reporting and is available in English, with phonelines for Denmark, UK, Ireland, and the USA. It's accessible to direct employees, contractors, agency and third-party workers, value chain workers (mainly Tier 1), business partners, customers and the public. We ensure procedures are in place across operations and use a layered approach to respond to reports in local languages when needed. To ensure colleagues feel safe to speak up, we run awareness campaigns that signpost available channels and reinforce our commitment to protecting whistleblowers and those who report concerns in good faith. All concerns are reviewed by Group Ethics and Compliance and Employee Relations teams, who determine appropriate action and facilitate independent investigations as required. Channel usage and effectiveness is monitored against industry norms and colleague feedback, with oversight from the Audit and Risk Committee. Audits and remote worker surveys managed by third-party experts are conducted with higher-risk Tier 1 suppliers, requiring responses to ethical, social, and environmental questions in local languages. All concerns raised are investigated/actioned appropriately, with oversight from the Responsible Sourcing team.

10.2b	For any group of workers not covered, state why not and any plans to give access in the future.	I	PUBLIC		250 words
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n/a

10.3	Does the company assess the effectiveness of its grievance mechanism(s) against the criteria in Principle 31 of the UN Guiding Principles on Business and Human Rights (that is, whether the mechanism(s) is legitimate, accessible, predictable, equitable, transparent, and compatible with human rights)?	F	PUBLIC		Yes/No
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Yes

10.3a	If yes, provide more details (see guidance for what details to include)	F	PUBLIC		(250 words)
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Grievance mechanism effectiveness is assessed against Principle 31 of the UNGPs, in that it's legitimate, accessible, predictable, equitable, transparent and compatible with human rights. Through feedback and usage rates, we know colleagues are aware of and have access to the process. If levels drop/queries increase, we respond. In the past, if we've noticed a decline in Speak Up reports, we raise awareness by enhancing training, running campaigns on the importance of speaking up and improving signposting. We run annual Our Code refresher training to remind colleagues of their responsibilities and how to raise concerns formally. Stakeholders like trade unions and NGOs review performance, particularly for significant issues or if colleagues seek representation. Trade unions and NGOs have further helped us develop and improve awareness of grievance mechanisms, with process learnings applied. For instance in 2021, we worked with trade unions to streamline three grievance policies for different business units into one, ensuring consistency and improving clarity around timelines alongside roles and responsibilities. Today, this helps cases run more smoothly and efficiently. Our Employee Relations team have also improved in-house mediation by identifying and addressing conflict trends, which are discussed with trade unions in dedicated forums helping to reduce grievance volumes through stronger mediation resolution. In 2024, we additionally increased audit activity to ensure greater insight into worker conditions at higher risk supplier sites, running 27 third-party on-the-ground audits whilst continuing to work with our partner, AndWider, to deploy remote worker surveys.

10.4	Provide the number of grievances relating to human rights and/or workers' rights reported and resolved in the reporting period in the company's direct operations and in the company's value chain.	I	PUBLIC		Table
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Area of operations (Please note rows cannot be added)	Number of grievances reported	Number of grievances resolved
Direct operations	530	519

Value chain	0	0
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Note Q10.4: Number of grievances relate to all reported and resolved cases raised irrespective of whether they were upheld, within the same 2024 reporting year. A small number of grievances were subsequently resolved the following year due to factors such as the timing of grievance raised and/or complexity of case/resolution. In our direct operations, we cannot split the data by a human rights specific category, so we have instead reported all cases which may stretch into wider areas. In the future across our value chain, we'll explore additional ways that grievances can be reported.

10.5	Provide an example of how the company has provided or contributed to providing a remedy for a human rights/workers' rights grievance raised in the reporting period, including by consulting with impacted workers and any lessons learned.	I	PUBLIC		250 word limit
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Whilst solar panels are an essential technology to support the transition to net zero, we're acutely aware of the industry-wide concerns relating to the potential use of forced labour in the solar supply chain and specifically, the manufacturing of polysilicon which originates from the Xinjiang Uyghur Autonomous Region (XUAR). Recognising this challenge is not one we face alone and the difficulties surrounding traceability, we've taken steps to mitigate risk within our business and in collaboration with others which we continued during 2024. To reinforce ethical and sustainable procurement of solar panels, we now use a preferred supplier list that has been developed through robust market analysis and alignment to an agreed set of principles designed specifically to address stated challenges. We've also worked with the Solar Stewardship Initiative to drive greater visibility within the supply chain which includes the development of a chain of custody solution to be adopted throughout the manufacturing of solar panels to enhance traceability and reduce risk. To strengthen our approach, we expanded onsite audits and remote worker surveys to our solar supply chain in 2023 and in 2024, we continued to deepen due diligence and dialogue. Although we did not identify presence of modern slavery, our Responsible Sourcing team continue to closely monitor forced labour concerns at a raw material level to ensure the ongoing ethical procurement of solar panels. Our Human Rights and Modern Slavery Steering Group and SESC continue to maintain oversight. Progress and findings are communicated via our Modern Slavery Statement.

10.6	What policies and procedures does the company have to protect workers from retaliation and reprisal for speaking up or lodging a grievance relating to their rights as workers and working conditions?	F	PUBLIC		250 word limit
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We've a zero-tolerance approach to any form of retaliation to employees, contractors or workers in the value chain, who report a grievance or suspected/actual breach of Our Code in good faith, even if they were mistaken. This approach is supported by our commitment to anti-retaliation within our Whistleblowing Policy, which applies to all. We consider retaliation gross misconduct. If retaliation is identified, this should be raised with line management, People teams or via the Speak Up helpline. Penalties for contravention are up to and including dismissal. Through communication campaigns, our annual online Our Code refresher training and colleague inductions, we aim to foster a culture where colleagues feel able to speak up without fear of retaliation. For instance, in our communications and training, we specifically raise awareness of the protections in place to guard against retaliation and highlight that colleagues can raise concerns anonymously via our 24/7 Speak Up online and phone-based helpline. We've seen increases in use of the helpline following campaigns and/or training activity, which demonstrates that these methods are effective at delivering cut-through, giving us confidence that people feel satisfied with protections. During the investigation phase, personal details are kept highly confidential. No information is disclosed outside of the immediate team dealing with the grievance unless required by law or if an important public interest is at stake. If it's necessary for anyone in the investigating team or beyond to know the identity of individual(s) involved, this will first be discussed with the complainant or complainant's representative.

## 11 SUPPLY CHAIN TRANSPARENCY

Supply chain structure and location

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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11.1	Provide a description of the company's value chain and explain its role in the company's business model.	F	Mandatory PUBLIC		250 word limit
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To energise a greener, fairer future, we supply energy, services and solutions to over 10m customers through leading brands that are powered by around 21,000-strong colleagues and 7,000 Tier 1 suppliers. In 2024, our Group value chain spanned three areas: 1) Retail – Focused on customer-facing businesses to run and heat homes and business through British Gas in the UK, Bord Gáis Energy in Ireland and Centrica Business Solutions (CBS) in the UK, Europe and USA (>4,000 suppliers: 61% supply chain spend), 2) Infrastructure – Provides energy to homes and businesses through our subsidiary Spirit Energy and minority stake in the UK's existing nuclear power stations, alongside our Whitegate power station in Ireland, CBS power generation and storage assets as well as Centrica Energy Storage+'s Rough storage facility in the UK (>2,500 suppliers: 22% supply chain spend), and 3) Optimisation – Connects our infrastructure with our retail market whilst helping balance and support energy markets globally via Centrica Energy (>1,000 suppliers: 1% supply chain spend). Across these operational divisions alongside our Group Functions, we spend around £3bn for goods and services directly sourced from Tier 1 suppliers operating across more than 30 countries. These include some higher-risk jurisdictions such as Cambodia, China, India, Morocco and Serbia, although the majority of our spend is with suppliers based in lower risk countries like the UK. We don't have full visibility over Tier 2-3 suppliers and are therefore unable to state how many suppliers make up this category. See [centrica.com/modernslavery](https://centrica.com/modernslavery) for more.

11.2	Provide details on the company's efforts to map its value chain, including beyond the first tier. State the percentage of the company's upstream value chain mapped to date.	F	PUBLIC		250 word limit
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100% of Tier 1 suppliers register in our third-party supplier management system and are therefore mapped with respect to location, commodity and annual spend. In some cases, however, Tier 1 is mapped to the headquarters verses site location. To better understand our supply chain, due diligence is conducted on all Tier 1 suppliers. Those identified as high risk according to third-party country and commodity risk indices via our third-party tool, are subject to regular enhanced risk assessments and potentially a site audit which may result in an improvement plan. Beyond Tier 1, we've undertaken mapping on a category centric basis in accordance with whether activity or jurisdiction are considered higher risk. Based on this criteria, the manufacturing of garments, solar panels and smart metering, have been mapped further with supplier support, providing greater transparency and traceability including across Tier 2. For our solar supply chain, we've reached Tier 3 with the help of the Solar Stewardship Initiative, mapping to mono-grade silicon level due to polysilicon's potential exposure to the Xinjiang region. This approach has enabled us to better evaluate risk and target action to ultimately safeguard workers' rights. Given the breadth of our supply chain and challenges gaining greater transparency, we recognise the gaps in knowledge for parts of our supply

chain, particularly across Tiers 2-3. To ensure efforts are best spent, we'll continue to maintain our approach to mapping focused on higher risk areas and review extending coverage as appropriate in the future.

11.3	Does the company publicly disclose the results of its value chain mapping?	I	Mandatory PUBLIC		Yes/No
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No

11.3b	If no, how is the company improving transparency of its value chain? Include examples and state the total number of first tier suppliers in the company's upstream value chain.	I	PUBLIC		(150 words)
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We've around 7,000 Tier 1 suppliers and don't currently disclose value chain mapping. To improve transparency over our value chain, we maintain focus on all of our Tier 1 suppliers undertaking due diligence via an onboarding responsible sourcing questionnaire and Sedex risk assessment with any suppliers identified as higher risk, required to undergo an audit. If any non-compliance is identified, we work with the supplier to put a remediation plan in place. This approach ensures we can identify risk and raise standards. We then communicate our progress transparently in our annual reporting which we believe meets our stakeholder needs and has earned us a place in the CCLA's second highest performance tier, for our approach and disclosure on modern slavery. We do, however, recognise the need to enhance our approach, particularly as we build towards CSRD. In the future, we hope to publish supply chain mapping once further work completes.

Supply chain numbers

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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11.4	Provide the number of first tier suppliers in each of the company's top ten sourcing locations (determined by percentage of overall procurement/spend).	I	PUBLIC		Table
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Top ten sourcing locations by percentage of overall procurement/spend	Number of first tier supplier organisations
UK	2,901
Ireland	344
USA	324
Netherlands	28
Germany	22
France	11
Hong Kong	5
Luxembourg	4
South Africa	4
India	3

Note Q11.4: Constitutes our Tier 1 suppliers available via our primary UK system only. A broader breakdown is not yet readily available.

11.5	Provide the estimated number of workers in the first tier of the company's upstream value chain. Companies can indicate what percentage of their upstream value chain this covers in 11.6.	C	PUBLIC		(150 words)
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Around 6m.

Note Q11.5: Our figure of 6m is a rudimentary estimate. Our primary third-party sustainability tool used to engage suppliers doesn't have functionality that enables us to report on the number of workers in Tier 1 of our supply chain. To complete a response to this question in an effort to be as transparent as possible, we've therefore based our calculation on the average number of workers per company based on information disclosed by a small number of higher risk suppliers in the Sedex supplier management tool which has been used as a proxy for wider calculation. The number may be higher in reality.

11.6	Scope of disclosure (relates to Q11.5)		PUBLIC		Dropdown
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- ≤50% of first tier – selected**
- 51%-75% of first tier
- ≥76% of first tier
- All of first tier

11.7	Provide the average length of relationship the company has with its direct suppliers.	I	PUBLIC		50 words
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Three years is our average contract length. We are currently unable to access information relating to ongoing relationships.

11.8	Does the company collect data on the gender composition of its value chain workforce?	C	PUBLIC		Yes/No
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Yes

11.8a	If yes, provide evidence.	C	PUBLIC		(150 words)
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In our Responsible Sourcing Policy, we require all suppliers to uphold and embrace diversity and inclusion. We use a supply chain management system whereby all medium and high-risk Tier 1 suppliers are continuously being rolled onto the system and are encouraged to provide gender composition via completion of the self-assessment questionnaire. Over 130 suppliers have completed this information which reveals a workforce breakdown of 64% men and 36% women. This is the first time we've reported a gender split, albeit on a relatively small proportion of our supplier base, and we hope to continue to build on our gender disclosure in the future to enable stronger supply chain insight. In the meantime, we continue to monitor and review risk in additional ways, such as via our direct worker reporting programme which captures gender of those answering the surveys, enabling us to identify and action related issues in higher risk areas.

High risk supply chain areas

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
11.9	Provide details on any specific products, services and raw materials, wherever these feature in the value chain, identified to be of particular risk of forced labour, modern slavery and human trafficking.	I	PUBLIC		250 word limit

We've conducted risk assessments across our supply chain and identified four focus areas that are of particular risk to modern slavery based on their associated industry and jurisdictional risk (according to Sedex Radar which rates sites, sectors and countries 0-10 on various ethical issues and associated risk, coupled with external and internal subject matter expertise). Our focus areas are: 1) Garment manufacturing of engineer uniforms in Cambodia, China, Poland and Serbia, 2) Smart technology products manufactured for branded goods like our Hive home solutions in China alongside smart metering in China, Greece and Morocco, 3) Solar panel manufacturing with specific reference to polysilicon production which is a key component and occurs in China, and 4) Battery systems manufacturing of both systems and components in India. The first focus area is essential to our everyday operations whilst the latter is largely critical to energise a greener, fairer future and are areas we expect to ramp up as the energy transition deepens. Higher risk suppliers operating across these areas are monitored closely via site audits using the ETI-Base Code and SMETA rating alongside ongoing risk assessment and relationship meetings. These suppliers form a small part of our supply chain, constituting 0.35% of our suppliers, with the vast majority of our primary spend categories comprising of business and professional services operating from lower risk countries.

## 12 RESPONSIBLE SOURCING

### Sourcing strategy

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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12.1	What measures are in place to incentivise those responsible for the company's day-to-day sourcing decisions effectively ensure the company meets responsible sourcing and workers' rights commitments (beyond adherence to the company's Employee/Business Code of Conduct/Ethics Code etc)?	I	PUBLIC		250 word limit
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We've a number of incentives to support and drive effective decision-making for those responsible for day-to-day sourcing, enabling Centrica to meet its commitments on responsible sourcing including workers' rights. For example, our Procurement Managers are responsible for understanding and embedding responsible sourcing in day-to-day interactions. They undergo training on matters like modern slavery and are supported by Responsible Sourcing Champions who can provide additional guidance. This approach enables colleagues to carry out their job effectively, with evaluation of this conducted via quarterly performance reviews linked to remuneration. Additional day-to-day incentives are available via our global 'Recognition' platform. The platform enables all colleagues to nominate one another in recognition of a key achievement – in this case, embedding and maintaining robust responsible sourcing standards, with the reward of feedback that can be used in performance reviews and points that can be turned into monetary vouchers and redeemed at key retailers. Incentives are also in place for roles accountable for ensuring the right strategic decisions are made to uphold responsible sourcing and workers' rights, as well as the identification of any issues in relation to these focus areas. For instance, Procurement Directors alongside other key Responsible Sourcing personnel, are incentivised through standard performance evaluation processes linked to remuneration based on their ability to reduce risk and strengthen supply chain resilience. All incentives go beyond the requirement for colleagues to uphold Our Code's fundamental commitment on human rights, which forms part of everyone's contract who works for or with us.

12.2	Does the company assess supplier performance against its own human rights commitments, as applicable, as part of the process for selecting new suppliers?	F	PUBLIC		Yes/No
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Yes

12.2a	If yes, what percentage of new suppliers (in the last reporting period) were assessed in this way and how is performance on workers' rights weighted or balanced against other selection criteria?	F	PUBLIC		250 words
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100% of new suppliers were assessed on human rights commitments in 2024. This forms a central part of the onboarding and risk assessment process, whereby suppliers are required to uphold and protect human rights as set out in our Responsible Sourcing Policy which is aligned to international human rights standards. Initial due diligence is undertaken before contracting, consisting of a series of robust onboarding checks across multiple labour, product, country/origin and financial crime indicators. Suppliers are also required to complete a responsible sourcing questionnaire at onboarding or when participating in a tender. When deciding supplier selection, sustainability is weighted equally to other areas on the scorecard such as cost, quality and service. Potentially higher risk suppliers identified via the onboarding process, are required to undergo further risk assessment via the Sedex supplier management platform, to ensure human rights risks are understood. Assessment includes criteria such as working hours, pay/overtime rates, site facilities and more. Following assessment, 34 sites across our four focus areas outlined in Q11.9, underwent on-the-ground audits or remote worker surveys. In 2024, 0.35% of suppliers were identified as higher risk. If a potential supplier is not willing to work with us to match our high standards on human rights, we'll not enter into a new relationship or tender with them. For example following engagement during 2024, two suppliers based in India operating under our grid infrastructure purchasing category, will not be allowed to participate in tenders or receive orders until standards are raised.

12.3	Does the company require suppliers to respect a minimum set of labour standards of workers' rights in a supplier code of conduct, or similar?	F	Mandatory Public		Yes/No
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Yes

12.3a	If yes, provide a link to or attach the relevant public document or describe the terms included in contractual arrangements?	F	Mandatory Public		150 words
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Every supplier we partner with is required to sign up to and uphold our Responsible Sourcing Policy and Our Code. The policy includes all key sustainability objectives spanning the Real Living Wage, equal pay and other responsible payment practices like the 'Employer Pays Principle', human rights, health and safety, diversity and inclusion, collective bargaining and more. Our policy was originally established more than a decade ago and is in line with leading international standards such as the UN Global Compact and the Universal Declaration on Human Rights, as well as the ILO Convention 155 and Recommendation 164 on occupational health and safety. Further detail is available in our [Responsible Sourcing Policy](#).

Monitoring suppliers

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
12.4	Describe the process for monitoring or auditing supplier performance against the document disclosed at 12.3, including beyond the first tier of the upstream value chain, the standards used for the monitoring process, and whether the results are made public. State the percentage of suppliers independently audited.	I	PUBLIC		250 word limit

100% of Tier 1 suppliers are monitored by Procurement through the standard onboarding and risk assessment processes. Medium and higher risk Tier 1 suppliers undergo further monitoring and auditing through the Sedex supply chain management platform. This assesses the minimum standards across sustainability matters, including in relation to the 'Employer Pays Principle'. If suppliers receive a higher-risk rating, they're considered for further due diligence. This typically involves a site visit by an independent auditor who has expertise in labour rights. The auditor undertakes a series of inspections in line with the SMETA 4-Pillar Audit protocol, spanning labour standards, health and safety, business ethics and environmental performance, based on the Ethical Trading Initiative (ETI) Base Code alongside local law requirements. This includes analysing the working environment and company documentation, as well as undertaking interviews with workers. The 27 site audits and seven remote worker surveys undertaken in 2024 at higher risk suppliers, constituted 0.35% of suppliers. Whilst efforts didn't identify 'business critical' non-conformances, 191 instances of non-compliance was identified. Corrective action plans were put in place to raise standards which are closely monitored to ensure progress. By the end of 2024, 89% of non-compliances were resolved with the remainder on track for completion in 2025. Beyond Tier 1, our approach to monitoring risk is primarily managed through risk management tools and supplier engagement which draw on ISO principles. We share results of monitoring and auditing processes in our annual Modern Slavery Statement ([centrica.com/modernslavery](https://centrica.com/modernslavery)).

12.5	How does the company assess whether its sourcing and/or purchasing practices allow a supplier to meet its workers' rights commitments e.g. by requesting feedback on the business relationship from suppliers etc?	I	Mandatory PUBLIC		250 word limit
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We engage suppliers to understand if our sourcing and/or purchasing practices allow suppliers to meet their workers' rights commitments. Towards this, Procurement Managers maintain collaborative relationships with suppliers to ensure high standards are upheld whilst exploring whether our practices may have unintended adverse impacts – whether that's on paying worker wages or ensuring strong health and safety practices. They're supported in this process with dedicated training as well as insight from risk assessments. Where concerns arise around worker welfare, we roll-out audits and hear directly from workers via remote worker surveys which were deployed to nearly 7,000 people during 2024. To date, we haven't received feedback confirming that our sourcing and/or purchasing practices have had a material adverse impact. Conversations with suppliers have, however, enabled us to better support suppliers and their workers. For example, we continued to offer 30 days payment terms for all small companies and charities during 2024. This follows engagement in 2022 which enabled us to better understand the cash-flow struggles they were facing and informed our decision to slash payment terms in half to help maintain their vital place in society. We also continued to engage suppliers and the Living Wage Foundation on the Real Living Wage to ensure that together, we maintain our commitment to pay at least the Real Living Wage to contractors in the UK. We remain open to exploring further supplier engagements to understand what we're doing well and where we can improve, whilst harnessing collaborative opportunities to support people and planet.

12.6	Do the company's responsible sourcing policies and practices apply to third party labour providers (labour agencies, logistics, cleaning, security, etc.)?	F	PUBLIC		Yes/No
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Yes

12.6a	If yes, provide more details	F	PUBLIC		150 words
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All suppliers, including third-party labour providers, must adhere to our Responsible Sourcing Policy which forms part of our contract with them. These include respecting, upholding and advancing the protection of human rights, as defined by the UN Global Compact, the UNGPs and the ILO. As part of this policy, suppliers mustn't use any form of involuntary or child labour, ensure overtime is voluntary and not excessive, provide a safe and inclusive workplace free from discrimination or abuse, and offer fair reward and recognition. We work

with external agencies where we source labour for specific jobs, such as security or onsite maintenance, to ensure our employment requirements are met. These include right to work screening and adopting the 'Employer Pays Principal' as well as the Real Living Wage in the UK. Contractual arrangements ensure anyone who fails to comply, must instigate immediate remediation or agreements will be terminated.

12.7	How does the company measure whether it is effectively incentivising supplier progress on workers rights and working conditions? State the performance incentives and KPIs used, and progress against these.	I	Mandatory PUBLUC		150 word limit
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During the tender process, responsible sourcing principles and KPIs are measured and ranked, allowing us to increasingly consider things like workers rights and the environment. Once onboarded, suppliers undergoing a sustainability desktop assessment or audit, are tied to the analysis of strong labour rights and conditions. If a labour non-compliance is found, we implement a corrective action plan and closely monitor implementation of improvements via a dashboard. Whilst continued non-compliance may result in ending our relationship with the supplier, good labour practices can be rewarded with contract renewals or longer-term contracts. We see this as an effective way to encourage good performance. This can be demonstrated by all suppliers who have undertaken action plans, improving performance. For instance, 83% of the 191 non-compliances identified across audits during 2024 were resolved in year with the remainder on track for completion during 2025.

## 13 SUPPLY CHAIN WORKING CONDITIONS

Workers' rights in the supply chain

Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
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13.1	What action has the company taken to build the capacity of other entities in its value chain to mitigate and manage risks to workers' rights, including in their own value chain (e.g. through training)?	C	PUBLIC		250 word limit
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Through our commitment to raise standards across our supply chain, we focus on building capability so that we strengthen and share best practice with suppliers to effectively manage and mitigate risks relating to workers' rights across their business and wider supply chain. We've run enhanced in-house modern slavery and human rights training which 100% of our Procurement Managers have completed, enabling us to build capability to identify and address issues if they arise at supplier sites. Across Cambodia, China, Greece, India, Morocco, Poland, Serbia, Turkey and the UK, we also conducted third-party on-the-ground and remote worker audits that resulted in corrective action plans for 34 suppliers. As a result, these suppliers were helped to create action plans to address 191 non-compliances and raise standards for workers in areas like health and safety, working hours, wages, environment and terms of employment – improvements that may otherwise not have been implemented. Additionally, a Responsible Labour Practice Toolkit is provided as part of our supplier portal on [centrica.com](http://centrica.com). The Toolkit can be used to grow capability by developing a shared understanding of our minimum expectations whilst providing best practice to suppliers who want/can go further in building their labour practices, including ways to guard against forced labour. Through our membership of industry-leading organisations like the Slave Free Alliance, Utilities Against Slavery and the Solar Stewardship Initiative, we continuously learn, share and disseminate best practice across our supply chain.

13.2	How is the company working to ensure that value chain workers can exercise their rights to freedom of association, including the right to unionise, and collective bargaining?	I	PUBLIC		250 word limit
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We ensure our supply chain workers can exercise their rights to freedom of association, including the right to unionise and participate in collective bargaining. This is enshrined in Our Code and our membership of the UNGC. From the outset of our relationship with suppliers, we state the need to uphold workers' rights through stipulations in our Responsible Sourcing Policy which suppliers agree to adhere to in supplier contracts. All suppliers are then assessed on freedom of association and collective bargaining via the onboarding risk process. Strategic suppliers are further evaluated through a third-party sustainability risk assessment platform and if they're considered higher risk, we explore deeper due diligence which may involve an independent auditor undertaking a site inspection or rolling out remote worker surveys. During these audits, the right to freedom of association and collective bargaining is investigated, such as checking company policies, minutes and

asking workers if they've access to appropriate information to take-up their rights. If suppliers fall short of our standards, we'll consider appropriate action which may result in creating an action plan for improvement or ending our relationship. A challenge or constriction to this commitment is that in China, workers can only join legal unions rather than forming their own. In these instances, we endeavour to monitor rights carefully and utilise direct worker engagements through remote worker surveys, to ensure we've the right knowledge to manage the risk and safeguard rights. We'll also work directly with trade unions to resolve specific issues and grievances.

Improving working conditions in the supply chain					
Question Number	Question Text	Question Tier	Privacy setting of Answer		Answer Criteria
13.3	How does the company assess whether it is improving conditions for workers in the value chain? Describe any steps or initiatives the company is taking to improve the working conditions of value chain workers and provide evidence demonstrating the effectiveness of these measures.	I	PUBLIC		250 word limit

We've initiatives that improve supply chain working conditions and track progress with KPIs. In 2024, we collaborated with independent sustainability supply chain risk experts and auditors to detect and audit higher risk suppliers, enabling our audit scope to widen. Whilst no 'business critical' issues were identified via the audits, 191 time-bound non-compliances were tackled and tracked via corrective actions plans. Non-compliances mainly related to health and safety matters, with the majority of actions closed in year and the remainder due during 2025. Responsible Sourcing performance alongside associated strategy, is overseen by the Procurement VP and Director, with oversight maintained by the SESC and Board. A high-level summary of audits is published in our Modern Slavery Statement, approved by these bodies. We strive for strong relationships with suppliers and work to enhance those where greater transparency is needed. In 2024, remote worker surveys supported this process, which had satisfactory completion rates. We've additionally created a Responsible Labour Practice Toolkit to grow a shared understanding of our minimum expectations including adoption of the 'Employer Pays Principle' whilst providing best practice to suppliers keen to improve further. Partnering with ethical organisations like the Slave Free Alliance alongside trade bodies such as the Solar Stewardship Initiative, enables us to harness learning to improve resources like the Toolkit whilst supporting systems-level change. As a result of our robust approach, no instances of forced labour were identified during 2024. We do, however, remain vigilant and focused on continuous improvement.

13.4	Has the company identified any instances of forced labour, modern slavery, human trafficking or child labour in its value chain in this reporting period?	I	PUBLIC		Yes/No
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No

13.4b	If no, state why not and describes steps taken to conduct due diligence on forced labour, modern slavery, human trafficking and child labour risk.	I	PUBLIC		(150 words)
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We've identified no explicit instances of forced labour and/or modern slavery/human trafficking/child labour. To guard against risk, during onboarding we assess modern slavery risk whilst an external supply chain expert rates suppliers to identify risk. If they receive a higher risk rating, companies undergo a third-party on-the-ground site audit to inspect labour practices and working environment whilst reviewing company documentation and talking to workers. Remote worker surveys may also roll-out to enable direct feedback. Across audits in 2024, auditors didn't identify 'business critical' non-compliances but did identify instances of poor working practices including poorly maintained fire safety signage alongside potential indicators of forced labour like excessive overtime - these were, however, investigated further and not considered modern slavery. Overall, 191 non-compliances were identified and corrective action plans agreed with suppliers. Off the back of these, we continuously monitor effectiveness of controls and take action to raise standards.

13.5	Is prison labour used in the company's value chain?	I	PUBLIC		Yes/no
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Yes

13.5a	If Yes, provide more details	I	PUBLIC	250 word limit
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Our National Distribution Centres have contracts with waste and recycling company Recycling Lives, who uses prison labour largely from HMP Buckley Hall near Rochdale, to breakdown some of our old smart meters and scan associated data. They've a contract with the Ministry of Justice (MoJ) to use voluntary prison labour to ultimately enable the prisoners to change their lives and avoid reoffending when released by arming them with new skills and self-confidence. The academy programme is run to high UK labour and safety standards, with work hours limited to around 5-6 hours maximum Monday-Friday. Prisoners sign a Memorandum of Understanding that shares what's expected of them, and what they can expect in return on issues like remuneration, training and support as well as their ability to withdraw their labour at any time. Recycling Lives is popular among prisoners. The MoJ pays their wages according to regional and skill level which tends to be much higher than what prisoners could earn from normal prison jobs, and a good proportion of their wage is consequently put into a savings account to support their eventual reintegration into society. The wider wrap-around package of support from the specialist team is also key in helping them get ready for the outside world – from ensuring they've correct ID and working documents, to setting up accommodation and employment through connections with a variety of employers. Less than 5% of those on the programme reoffend and return to prison, which compares incredibly favourably against the national average.