

CNG Modern Slavery Statement 2018/19

This statement has been published in accordance with s.54(1) of the Modern Slavery Act 2015. It sets out the approach that Contract Natural Gas Limited ("CNG" or "we") has/have taken both to understand all potential modern slavery and human trafficking risks related to its business, and the actions undertaken to reduce any such risks during the years 2018/19.

Introduction

CNG are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business. We are absolutely committed to preventing slavery and human trafficking in any of our business activities, and we expect the same high standards which we set for ourselves from those parties with whom we engage.

This commitment is emphasised and detailed below.

Our business

CNG is an independent shipper of gas (Wholesale) and supplier of gas and electricity (Retail) in the United Kingdom. CNG has 200 employees and, in addition to the Wholesale shipping business and Retail supply business also operates physical supply-chain fulfilment arrangements throughout Europe.

CNG's business is split into three primary business teams: Wholesale Suppliers (Shipping), Retail Supply (SMEs and larger corporations) and Trading (physical supply-chain fulfilment).

Third Party Supply Chain(s)

We understand that our biggest exposure to Modern Slavery is in our supply chains.

CNG has numerous relationships with third parties which pose certain risks, these include:

- Wholesale (third party) gas suppliers: Wholesale customers who use CNG's shipping license to supply to individual households.
- Retail/Business customers: CNG supplies gas to companies across the United Kingdom.
- Third Party Intermediaries: Include switching websites, brokers and energy efficiency advice providers and service customers.
- Brokers: CNG markets energy product deals through brokers who deal with the end customer.
- Agents: CNG requires a number of agents in place in order to service customers and meet our supply license obligations.
- National Balancing Point ("NBP") and Related Parties: As a shipper, CNG is required to meet the forecasted demand of our customers. Our Trading team purchases gas from the NBP, where the gas is drawn upon from various sources, in order to meet this forecast.
- Meter Asser Providers ("MAPs") and Meter Asset Managers ("MaMs"): The procurement of metering equipment from MAPs in order from MaMs to install equipment in order to support our business.
- Payment Service Providers ("PSPs"): PSPs process card payments on behalf of CNG.
- Those employed to maintain the premises where we work and the services provided to it.

The risk that these relationships pose is that CNG cannot control or guarantee the recruitment/hiring process of third party suppliers. In order to reduce this risk, CNG identifies and only does business with companies who have standards which match its own. CNG would encourage the businesses throughout its supply chain to adopt and enforce similar policies in their own operations. If a business who CNG is partnered with is found to be unethical in its practices CNG will break the relationship as soon as this becomes evident and it is possible.

Recruitment at CNG

CNG operates a clear and fair recruitment process; including conducting thorough eligibility checks for working in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our Risk Weighting, KPIs and Summary

CNG has undertaken a detailed risk analysis, and uses the following key performance indicators ("KPIs") to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Level of communication and personal contact with the next link in the supply chain. Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour.
- Operate a Whistleblowing Policy, aimed principally at our employees to encourage staff to report any wrongdoing. All reports here will be fully investigated and appropriate remedial actions taken.
- Our Managing Director is committed to raising awareness of the Modern Slavery Act and Human Rights through ensuring any supplier we work with has the same values and principles as CNG. This affirms our zero tolerance approach to human rights abuse; encourages suppliers to establish their own risk assessment processes; and informs them that we will be periodically checking compliance with our standards.
- Operate only in the United Kingdom – a low risk jurisdiction.

Approval for this statement



Jacqui Hall
Managing Director

Date 28-06-18