BG Group Standard
Speak Up (Duty to Report)
BG-ST-LEG-ECCU-009
Contents

1.0 Executive Summary ........................................................................................................3
2.0 Ownership ..........................................................................................................................3
3.0 Objectives ..........................................................................................................................3
4.0 Scope and application ........................................................................................................3
5.0 Links to other controls .......................................................................................................4
6.0 Standard requirements ......................................................................................................5
   6.1 How BG Group shall implement the Speak Up (Duty to Report) Standard ................. 5
   6.2 Mandatory requirements on Personnel ........................................................................ 5
7.0 Appendices ........................................................................................................................6
   Appendix A – Gap Analysis Template ................................................................................ 6
1.0 Executive Summary

BG Group is a global business operating in diverse cultures and business environments. We rely on everyone who works for or on behalf of BG Group to live up to all of our Business Principles and Policies by behaving ethically and responsibly.

Failure to work in accordance with our Business Principles and Policies represents a risk to the reputation of BG Group which could threaten our licence to operate and continued success of our business. If breaches occur despite our system of internal controls, reports by personnel and others provide a means for BG Group to initiate proper investigation and to take any necessary action. We therefore impose a duty on Personnel to report actual or suspected breaches.

2.0 Ownership

Owing Function: Legal
Standard owner: Head of Ethical Conduct
Expert advisor: Head of Ethical Conduct
Dispensation: Head of Ethical Conduct

3.0 Objectives

The objective of this Standard is (i) to set out how BG Group shall implement Section 4.4. of the Governance, Conduct and Speak Up Policy and (ii) to set out the mandatory requirements, additional to those in Section 4.4 of the Governance, Conduct and Speak Up Policy, on Personnel who report any situation alleging there has been a breach, or potential breach, of our Business Principles, Policies and Standards or law or regulations by BG Group or its personnel or anyone associated with BG Group (such as its partners or contractors).

4.0 Scope and application

This is a Personal Conduct Standard. Application of Personal Conduct Standards is mandatory for all BG Group employees, consultants and other personnel working in controlled\(^1\) Assets and offices, and those seconded to non-controlled Joint Ventures, henceforth, referred to as “Personnel.”

For BG Group employees, breach of this Standard may result in disciplinary action, up to and including dismissal. Breach of this Standard by any individual who is not a BG Group employee may result in other appropriate action being taken in relation to the individual and/or the business which supplies services to BG Group, including termination of the relevant contract(s).

---

\(^1\) Refer to [Internal Control Framework - Integrity Standard](#) for the definition of controlled and non-controlled Joint Ventures.
This Standard is not contractual. BG Group reserves the right to amend, suspend or terminate this Standard.

5.0 Links to other controls

<table>
<thead>
<tr>
<th>Governing BG Group Policies:</th>
<th>Governance, Conduct and Speak Up: BG-Policy-02</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complementary and linked BG Group Standards:</td>
<td>Internal Control Framework – Integrity: BG-ST-LEG-SECT-001</td>
</tr>
<tr>
<td></td>
<td>Fraud Risk: BG-ST-FIN-GFIN-007</td>
</tr>
<tr>
<td>Supporting BG Group Guidelines:</td>
<td></td>
</tr>
<tr>
<td>Other Supporting Documents:</td>
<td></td>
</tr>
</tbody>
</table>
6.0 Standard requirements

6.1 How BG Group shall implement the Speak Up (Duty to Report) Standard

6.1.1 Details of how to report a concern shall be widely available to Personnel, including how to raise a concern if they feel unable to raise that concern with their line manager.

6.1.2 Investigations of concerns shall be promptly carried out under the direction of General Counsel.

6.1.3 The right shall be reserved not to investigate allegations (in particular anonymous allegations) which appear to be made without a reasonable belief that there has been a breach or suspected breach of (a) our Business Principles, Policies and Standards or (b) any laws or regulations and may, where appropriate, inform the party against whom the allegation was made.

6.1.4 In some circumstances, attempts to investigate or resolve a complaint shall take place via another relevant procedure (for example under a local grievance procedure). This decision will depend on the nature of the concern raised and shall arise particularly where a concern relates to an employee’s individual circumstances.

6.1.5 Progress of each case shall be tracked, recommendations implemented and appropriate action shall be taken, including disciplinary action when required.

6.1.6 Feedback shall be provided to the individual who raised the concern, where appropriate.

6.2 Mandatory requirements on Personnel

6.2.1 Personnel have a duty to report any situation alleging there has been a breach, or potential breach, of our Business Principles, Policies and Standards or law or regulations by BG Group or its personnel or anyone associated with BG Group (such as its partners or contractors).

6.2.2 Concerns shall be reported to line management, or if they feel unable to do so, to Legal, Group Audit or Human Resources. Alternatively, where they feel unable to use these channels, the independent and confidential Speak Up telephone or online reporting facility may be used.

6.2.3 As much information as possible shall be provided to ensure that a proper investigation can be carried out, and Personnel shall respond to requests for further information as the investigation progresses. The failure to provide additional information, without good reason, could lead to a presumption that an allegation has been made without a reasonable belief that there has been a breach or suspected breach of (a) our Business Principles, Policies and Standards or (b) any laws or regulations.

6.2.4 Allegations shall not be made without a reasonable belief that there has been a breach or suspected breach of (a) our Business Principles, Policies and Standards or (b) any laws or regulations.
# Appendices

## Appendix A – Gap Analysis Template

(please note that this is a summary of requirements, the Standard should be read in full)

<table>
<thead>
<tr>
<th>Standard Ref:</th>
<th>Summary of mandatory requirement</th>
<th>Author completes</th>
<th>Accountable / Business Unit</th>
<th>Can Asset / Function meet this requirement? Y/N</th>
<th>Action plan to meet requirement</th>
<th>Action plan completion date</th>
<th>Action owner (name and title)</th>
<th>Dispensation details (if action exceeds allowable implementation time)?</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1.1 V1.0</td>
<td>Details of how to report a concern shall be widely available to Personnel, including how to raise a concern if they feel unable to raise that concern with their line manager.</td>
<td>ECCU / Asset</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.2 V1.0</td>
<td>Investigations of concerns shall be promptly carried out under the direction of General Counsel.</td>
<td>ECCU</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.3 V1.0</td>
<td>The right shall be reserved not to investigate allegations (in particular anonymous allegations) which appear to be made without a reasonable belief that there has been a breach or suspected breach of (a) our Business Principles, Policies and Standards or (b) any laws or regulations and may, where appropriate, inform the party against whom the allegation was made.</td>
<td>ECCU</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.4 V1.0</td>
<td>In some circumstances, attempts to investigate or resolve a complaint shall take place via another relevant procedure (for example under a local grievance procedure). This decision will depend on the nature of the concern raised and shall arise particularly where a concern relates to an employee’s individual circumstances.</td>
<td>ECCU</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.5 V1.0</td>
<td>Progress of each case shall be tracked, recommendations implemented and appropriate action shall be taken, including disciplinary action when required.</td>
<td>ECCU</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1.6 V1.0</td>
<td>Feedback shall be provided to the individual who raised the concern, where appropriate.</td>
<td>ECCU / Asset</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.1 V1.0</td>
<td>Personnel have a duty to report any situation alleging there has been a breach, or potential breach, of our Business Principles, Policies and Standards or law or regulations by BG Group or its personnel or anyone associated with BG Group (such as its partners or contractors).</td>
<td>All personnel</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.2 V1.0</td>
<td>Concerns shall be reported to line management, or if they feel unable to do so, to Legal, Group Audit or Human Resources. Alternatively, where</td>
<td>All personnel</td>
<td>Y/N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
they feel unable to use these channels, the independent and confidential Speak Up telephone or online reporting facility may be used.

| 6.2.3 V1.0 | As much information as possible shall be provided to ensure that a proper investigation can be carried out, and Personnel shall respond to requests for further information as the investigation progresses. The failure to provide additional information, without good reason, could lead to a presumption that an allegation has been made without a reasonable belief that there has been a breach or suspected breach of (a) our Business Principles, Policies and Standards or (b) any laws or regulations. | All personnel |

| 6.2.4 V1.0 | Allegations shall not be made without a reasonable belief that there has been a breach or suspected breach of (a) our Business Principles, Policies and Standards or (b) any laws or regulations. | All personnel |