

Confidentiality of Information and Business Independence

STATEMENT REQUIRED UNDER LICENCE CONDITION 42 OF THE STANDARD ELECTRICITY DISTRIBUTION LICENCE

29 May 2019



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1. Introduction

This statement outlines the practices, procedures and systems adopted (or to be adopted) by UK Power Networks (Operations) Ltd. on behalf of Eastern Power Networks plc, London Power Networks plc and South Eastern Power Networks plc to ensure that it does not restrict, prevent or distort competition in the supply of electricity or gas or the shipping of gas or the generation of electricity.

UK Power Networks (Operations) Ltd. is part of UK Power Networks Holdings Ltd., whose details are as follows:

UK Power Networks Holdings Ltd
Newington House
237 Southwark Bridge Road
LONDON
SE1 6NP
Registered Company Number: 07290590

This statement is produced to satisfy the relevant requirements of Electricity Standard Licence Condition 42 and is approved by Ofgem.

UK Power Networks (Operations) Ltd. will take reasonable measures to ensure compliance with the terms of this statement as from time to time revised.

For the remainder of this statement:

- UK Power Networks (Operations) Ltd. will be referred to as “UK Power Networks”;
- Eastern Power Networks plc as “EPN”;
- London Power Networks plc as “LPN”; and
- South Eastern Power Networks plc as “SPN”.

Note that UK Power Networks Holdings Ltd has within its group, an affiliate known as UK Power Networks Services Holdings which is an unregulated business and as such does not hold a licence. It does not meet the definition of a Relevant Exemption Holder in Licence Condition 42 and is therefore not a Relevant Undertaking.

2. Managerial Separation

UK Power Networks includes the three licensed electricity distribution businesses: EPN; LPN; and SPN. UK Power Networks does not contain any relevant supplier, shipper or generation business.

UK Power Networks has its own Chief Executive who is supported by an Executive Management Team and, together, they make the day-to-day decisions that control the running of the business.

3. Operational and Information Separation

Licence Condition 42 requires managerial and operational systems that prevent any Relevant Undertaking from having access to confidential information. UK Power Networks is a separate company with no Relevant Undertakings.

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4. Branding

UK Power Networks conducts activities in/on behalf of the three licensees using the following logo.



5. Code of Conduct and Staff Training

5.1 Code of Conduct Staff

All UK Power Networks staff, contractors and agents are bound by a strict Code of Conduct that makes it a disciplinary offence to pass confidential information to anyone who does not have a right to that information.

Disciplinary rules apply to all UK Power Networks employees. Listed below are situations which would be considered as examples of misconduct in respect of disclosure of confidential information:

- Deliberate misuse or unauthorised disclosure of data stored in any UK Power Networks' computer systems, or attempts (whether successful or not) to gain access to computer systems or files for which the employee does not have authority, or unauthorised interference with any such data; and
- Disclosure to others of confidential information gained during the course of employment with UK Power Networks, such disclosure being actually or potentially detrimental to UK Power Networks' interests.

Managers are responsible for ensuring all staff, contractors and agents who are involved in handling confidential data, or using systems that record confidential data, receive training that covers their responsibility to maintain confidentiality. Training to avoid anti-competitive behaviour is also given and refreshed on a periodic basis.

5.2 New Staff

All new staff joining the Company will undertake an induction process. As part of that process they are briefed on Licence Condition 42 and are given a Code of Conduct Staff Leaflet, as outlined in Section 6.1.

6. Appointment of a Compliance Officer

UK Power Networks has appointed Tahir Mahmood as its Compliance Officer under Licence Condition 43. They have been given full access to staff, resources, premises, etc. in order to discharge their duties, as described by Licence Condition 43.

7. Monitoring Compliance

The Director of Safety, Strategy & Support Services within UK Power Networks is responsible for ensuring compliance with Licence Conditions 42, 43 and 43B. The Director is responsible for the production of periodic reports as required under these conditions. This responsibility is devolved to the Head of Regulation & Regulatory Finance.

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8. Investigation of Complaints

Both the Compliance Officer and Head of Regulation & Regulatory Finance have developed appropriate working arrangements to ensure adequate communication, investigation, remedy and customer outcome notification, to deal with all reported potential breaches.

All reported potential breaches, including failure to comply with the controls implemented in UK Power Networks will be notified to the Compliance Officer and considered by the Director of Safety, Strategy & Support Services/Chief Executive Officer. Any procedural or control weaknesses will be identified and corrected and, if appropriate, disciplinary action will be taken.

9. Contacts

A copy of this Statement can be found on the UK Power Networks website: www.ukpowernetworks.co.uk

Should any person require a printed copy of this Statement, or wish to discuss any issue of a compliance nature, please contact Paul Measday the UK Power Networks Regulatory Reporting and Compliance Manager, or Tahir Mahmood the Compliance Officer, by writing to either of them at the following address:

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