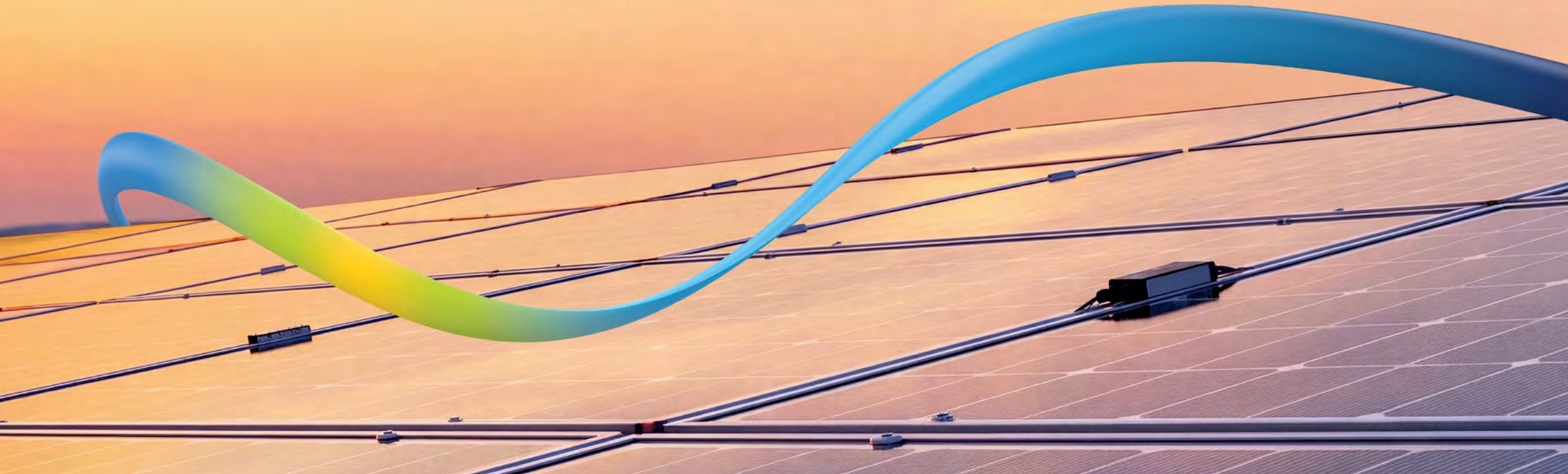
ESB Energy for generations

Delivering today for future us

Sustainability Report 2025



For future us

At ESB, we are stepping up to deliver bold energy solutions that will spark hope and drive change.

We're innovating with true creativity and imagination as we solve for the toughest energy challenges of this generation, and of those to come.

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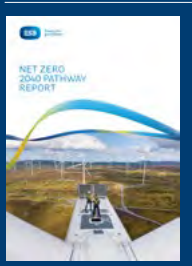
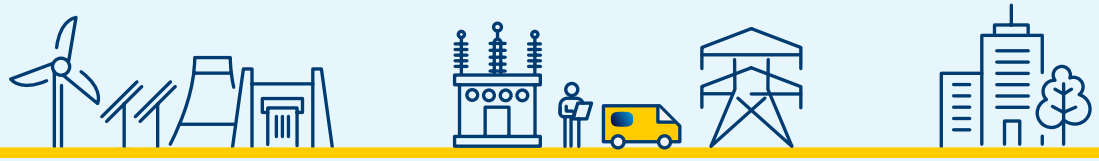
Sustainability Leadership Plan



Net Zero 2040 Pathway Report

ESB Group at a glance



Who we are

ESB was established in 1927 as a statutory corporation under the Electricity (Supply) Act, 1927. We are Ireland's foremost energy company, driven by an unwavering commitment to deliver a net-zero energy future for our customers and the communities we serve.

With a holding of 97.7%, ESB is majority- owned by the Irish Government. The remaining 2.3% is held by the trustees of an Employee Share Ownership Plan (ESOP).

What we do

As a strong, diversified utility, we operate across the electricity market, from generation through transmission and distribution, to the supply to our customers, in addition to using our networks to carry fibre for telecommunications. We are driven to make a difference by achieving zero carbon emissions by 2040.

How we do it

Generate electricity
from renewable and traditional sources.

Business units

Generation Trading (GT)
Develops and operates ESB's portfolio of wholly and jointly owned electricity generation assets. It also has a significant owned asset and third-party asset energy trading portfolio.

Operate electricity networks
ESB owns, builds and maintains the transmission and distribution network in ROI and NI.

Business units

ESB Networks*
ESB is the licensed onshore Transmission Asset Owner (TAO) and Distribution Asset Owner (DAO) in Ireland. ESB Networks DAC, a ringfenced subsidiary of ESB, is the licensed Distribution System Operator (DSO).

Northern Ireland Electricity (NIE) Networks
The owner of the electricity transmission and distribution networks and the licensed DSO in Northern Ireland.

Supply electricity, gas and energy services
to customers in ROI, NI and GB.

Business units

Customer Solutions
Brings together all ESB's customer offerings in Ireland and GB, including Electric Ireland, So Energy, Electric Ireland Superhomes, ESB's Smart Energy Services, ESB eCars and ESB Telecoms.

Support Functions

Engineering and Major Projects (EMP)
Provides engineering services to support the delivery of projects across ESB and manages ESB's commercial property portfolio. EMP also provides engineering and related professional services to external clients.

Enterprise Services
Provides business-critical processes and services to the Group as well as being an advisor in relation to professional services and leading the digital transformation of ESB.

Strategy, Innovation and Transformation (SIT)
Responsible for strategic direction, corporate affairs, legal, energy and regulatory policy and managing enterprise risk drivers. Also seeks to commercialise new transformational innovative business models and invest in the clean-tech sector.

* Staff in ESB Networks, a ringfenced business unit within ESB, carry out ESB Networks DAC's functions as Distribution System Operator and ESB's licensed functions as the licensed Transmission Asset Owner and Distribution Asset Owner for Ireland.

Highlights

c. 2.1 million
Smart meters Installed (Cumulative Republic of Ireland (ROI))

c. 280,000
Electric Ireland customers on smart tariffs

314g CO_2/kWh
Generation carbon intensity

+10,000
People employed

For future us since 1927

1920s

Established in 1927 to modernise Ireland's electricity supply, ESB launched the Shannon Scheme in 1929, using the power of the River Shannon to deliver reliable, renewable electricity.

← *Construction workers at Ardnacrusha Power Station, 1929.*

1930s

ESB expanded the national electricity network, increasing the number of homes and businesses with access to power.

→ *ESB's early advertising showed people how electricity could improve everyday life.*

1940s–1950s

Starting in 1947, ESB's Rural Electrification Scheme brought power to communities nationwide, boosting economic growth and improving everyday quality of life. Energy security was strengthened by diversifying fuel sources, as new peat, coal and oil generation sites were added in the 1950s.

↑ *Rural electrification crew on an ESB truck arriving in a rural town in 1951.*

1960s

As electricity became vital for economic growth, ESB expanded generation across the country, bringing investment and jobs to rural areas.

← *The peat-fired power stations built by ESB – such as this one in Cahirciveen – in the 1950s and 60s delivered economic benefits and employment to rural areas.*

1970s

Recognising its wider role in Irish society, ESB began considering its environmental impact and reporting on 'Social Responsiveness' in the 1970s. The 1974 Turlough Hill pumped storage station also introduced early nature-positive measures, such as reseeding to protect the landscape.

↑ *Turlough Hill pumped storage station nestled in the Wicklow Mountains.*

1980s–1990s

By the 1980s, ESB was a major contributor to the Irish economy through employment and domestic purchasing. Moneypoint coal plant opened and gas joined the generation mix in this decade, broadening fuel sources to strengthen energy security. As environmental awareness grew and early renewable projects emerged in the 1990s, ESB's first wind farm began operating in 1998.

← *Since ESB's first foray into wind energy in 1998, it has built an expansive on- and offshore wind portfolio in Ireland and Great Britain.*

2000s–2010s

Since the mid-2000s, ESB has driven Ireland's renewable energy growth by connecting large-scale renewables to the grid and expanding its own renewable generation. It also published its first standalone sustainability report in 2004.

↑ *ESB's cross-border EV charging network first went live in 2011.*

2020–2025

ESB's 'Driven to Make a Difference: Net Zero by 2040' strategy placed sustainability at the centre of its operations. Alongside major growth in renewable generation and grid connections, recent milestones include ESB's first battery projects, its first operational offshore wind farm, and its first wholly owned solar farm.

← *The end of coal-based generation at ESB's Moneypoint Power Station in June 2025 was a key milestone on the path to net zero.*

2026 and beyond

ESB continues to invest in low-carbon generation and resilient networks, helping customers and communities build a secure, sustainable energy future.

ESB Networks' distinctive yellow vans are a familiar sight around Ireland, particularly during storm responses.

Alignment with global standards and assessments

ESB is committed to aligning its sustainability strategy and disclosures with leading global standards and benchmarks. This alignment supports consistent, high-quality reporting for investors and stakeholders while demonstrating ESB's contribution to climate action, responsible business practices and broader sustainable development objectives.

As a statutory entity, ESB does not fall within the scope of the Corporate Sustainability Reporting Directive (CSRD), however ESB is committed to comprehensive and meaningful sustainability reporting, therefore ESB has decided to comply on a voluntary and Groupwide basis with CSRD reporting requirements. ESB is working towards delivering a CSRD compliant Sustainability Statement for reporting year 2027.

CDP (formerly known as Carbon Disclosure Protocol) is a global non-profit organisation that operates an environmental impact disclosure system. It facilitates the annual reporting of key environmental data, with the purpose of fostering transparency and driving actions towards a net-zero economy. ESB has maintained a B score for 2025.

Moody's Investor Services carried out a third-party assessment of ESB's emissions reduction pathway, using their 'Net Zero Assessment' (NZA) methodology. Moody's has assigned ESB an overall NZA score of NZ-3.

ESB was a founding member of BITC. It is a non-profit network dedicated to making businesses more responsible, sustainable, and inclusive. ESB has been awarded a recertification of the 'Business Working Responsibly Mark' by BITC, which is one of Ireland's leading standards for responsible business, assessing the full management system of an organisation across four pillars: governance, economic, social, and environmental.

The United Nations Sustainable Development Goals (SDGs) are a universal, actionable blueprint adopted by all UN Member States in 2015 to end poverty, protect the planet, and ensure global peace and prosperity by 2030. ESB aligns its corporate strategy with the UN SDGs, focusing on achieving net-zero emissions by 2040.

In conversation with our Chief Executive **Paddy Hayes** and Group Head of Sustainability, **Sharon McManus**

Leadership insights

Responsible actions for future us

2025 was a busy 12 months for ESB – from responding to the unprecedented impact on customers and infrastructure caused by Storm Éowyn in January, to progressing renewable ambitions with the announcement last winter that ESB and Ørsted had secured the rights to develop the 900 MW Tonn Nua offshore wind project. ESB Chief Executive Paddy Hayes and Group Head of Sustainability Sharon McManus reflect on key developments from the year and look to the challenges ahead.

What stood out to you in 2025 from a sustainability perspective?

Paddy Hayes There were many standout moments. One major milestone was ending the use of coal at our Moneypoint power station in a way that supports energy security; the determination, effort and drive from the organisation to deliver that ahead of schedule – that was really important. It took courage from both ESB and our joint venture partner EdF to bring the Neart na Gaoithe offshore wind farm in Scotland successfully through to commercial operation – that was a great achievement. And, while hugely challenging, the response of ESB Networks and NIE Networks to Storm Éowyn and the care shown by those teams (supported by many others) in restoring power to customers, while still coming through the year to deliver a total of 51,000 new connections, an over 15% increase on 2024 – that was tremendous.

Sharon McManus That also brings to mind the great progress made on enabling customers to generate their own electricity. We now have around 170,000 microgeneration installations in Ireland, mainly solar PV. It's been termed a 'rooftop revolution' for good reason, as it represents a broader transformation in how we use clean electricity. ESB has played a big role in supporting that – whether through ESB Networks enabling connections to the grid, or with related services and supports to customers provided by Electric Ireland or ESB Smart Energy Services.

Zooming out to look at ESB's long-term sustainability objectives: the concept of 'sustainability' can seem quite abstract or nebulous – from your perspective, what are the concrete ways that it influences strategic decisions in the organisation?

PH Sustainability stands out on the front page of ESB's strategy – so its importance is embedded at that very fundamental level. One practical implication of this is, for example, that for any of our investment decisions, the impact on future carbon emissions is considered, ensuring that sustainability is at the heart of the organisation's decision-making.

SM When seen through that long-term lens, you can also view sustainability as supporting resilience and leading to improved and adaptable electricity production. Affordability is another important piece of the puzzle, though, and there are questions around how to balance the objective of delivering net zero with the challenge of keeping costs affordable for customers. What are your views on how we navigate that?

"We've come a very long way and now it's essential to build on what has been achieved and to keep driving on."

Paddy Hayes

Leadership insights continued

PH I don't think those two objectives are in opposition to each other. Over the last few years, it has been the cost of gas on international wholesale markets that has really driven up the price of electricity. Moving from fossil fuels to renewables does take investment, but it increases our energy independence and reduces our exposure to international commodity gas markets where the prices can be volatile and driven by factors that are very much outside our control.

SM Yes indeed, an important facet of affordability is predictability and stability – avoiding a situation of huge peaks and troughs.

PH Exactly. And in the short term, we will have to keep finding ways to address the very real cost pressures faced by customers. For example, Electric Ireland has implemented a cumulative average bill reduction of 19% in electricity and 23% in gas since late 2022, and has kept electricity prices steady through this last winter to provide that stability for people.

The winter of 2025 brought Storm Éowyn to our shores, embodying a new kind of weather extreme that is becoming more and more frequent. What did 2025 reinforce for you in that space?

PH This impact of extreme weather continues to be felt around the globe: we have recently seen lives lost to flooding in South Africa, while Australia experienced flash floods side-by-side with forest fires and record-breaking heatwaves.

The physical impacts are becoming clear in Ireland, too. At ESB our hydro schemes mean that we are directly involved with a number of rivers and have been tracking water inflows for almost 100 years. The increase in the frequency of intense rain is very apparent, with some of the biggest sustained inflows ever recorded on the Lee and the Liffey being experienced during the past year. We often think about the affordability of investments in sustainability and carbon reduction – but it's just as important to consider the costs associated with not doing enough to stem climate change.

In 2025, we have delivered almost

€2.7 billion

capital investment

– more than double the volume in five years

SM I agree, and we are now facing the challenge of adaptation as well. We have focused so strongly on mitigation, and of course we need to keep accelerating that work. But adaptation is now coming into sharper focus, with planning and resources needed for that in parallel.

Looking to the future of ESB's sustainability journey, where do you see the greatest challenge on the road ahead?

PH When you look at how far and how fast we've come, it's incredible – but the road ahead always seems to get a bit steeper. The final piece of the journey is going to be tougher. We've made huge strides with wind, solar and battery storage. But ultimately, sometime between now and 2040, we're going to have to find a way to deliver long-duration energy storage economically and affordably – so that clean wind energy can be captured when there is a surplus and used when it's needed. That's probably the single most important challenge to come.

SM From a customer point of view, I think one area where progress is important is enabling a shift in behaviour as we move towards 2040 and 2050 – there may be a need to review market or pricing arrangements to make clean electricity more competitive relative to gas, or new measures to make the decision to move to an EV or electric heat pump more appealing.

To wrap up, as we look to that 2040 horizon and beyond – what gives you the most confidence in ESB's capability to deliver on its long-term sustainability objectives?

PH You just have to look at what has already been achieved by the electricity sector over the past 20 years. Through a period in which Ireland's electricity demand grew by 50%, the carbon intensity of our electricity reduced by 65%. We have successfully and responsibly phased out coal and peat generation without impacting energy security. In 2025, ESB delivered an investment of almost €2.7 billion in critical energy infrastructure, more than double the €1.2 billion invested in 2021 – evidence of the growth in ESB's capability to deliver on our strategy to support economic and social development and combat climate change, by delivering resilient infrastructure, developing renewables and empowering customers.

SM It's an impressive track record. And seeing sustainability playing that central role in the underlying decisions and actions on a day-to-day basis is really encouraging, as we accelerate our commitment to emissions reduction in all that we do. The best predictor of future performance is past performance, and ESB is in a strong position to demonstrate that as we move forward.

PH At ESB, I think everybody knows the importance of the electricity sector and that we will have to do more and faster in future, but we have shown our capability to deliver and scale up. We've come a very long way and now it's essential to build on what has been achieved and to keep driving on.

2025 sustainability highlights

What we've delivered, for future us.

Environment

Accelerating renewables, ending coal

1,050 MW

Delivered connections c.700 MW (grid scale) and c.350 MW for microgeneration renewables in 2025, bringing total renewables connected to almost 10 GW.

448 MW

The 448 MW Neart na Gaoithe offshore wind farm achieved commercial operations in May 2025, significantly increasing ESB's renewable capacity and supporting system-level emissions reduction.

310 MW

ESB has c. 310 MW of operational battery energy storage solutions (BESS) which enables renewables on the system.

314g CO_2/kWh

Carbon intensity reduced to 314 g CO_2/kWh, a 53% reduction versus 2005 baseline, reflecting sustained portfolio transition and system optimisation.

Social

Enabling customers, communities, capability

280,000+

Empowered 280,000+ customers with electricity insights via Smart Meter Tariffs. Installed over 2 million smart meters by the end of 2025. Supported vulnerable customers through targeted assistance measures and fuel poverty retrofit initiatives.

€2m

Over €2 million disbursed across community initiatives, including renewable community benefit funds and local development partnerships.

Marine Programme

The three-year ESB-funded Marine Mammal Observer Training Programme, supporting biodiversity in offshore renewable development, was the winner of the 'Renewable Skills Champion' Award at the 2025 Irish Renewable Energy Awards.

Governance

Embedding sustainability in strategy and oversight

ESG Reporting

Corporate Sustainability Reporting Directive (CSRD)-aligned reporting delivered enhanced sustainability disclosures aligned to emerging ESRS standards, strengthening double materiality integration and risk transparency.

Read more

Environment Page 24

Social Page 80

Governance Page 132

Global challenges and trends

It's important that we recognise and respond to the global challenges and trends that society faces.

International political energy policy developments

Global geopolitical instability continues, driven by conflicts in Ukraine and the Middle East, rising tensions in East Asia, and growing trade disputes. Measures such as EU and US tariffs on Chinese EVs reflect friction between trade policy and climate objectives, while major economies expand subsidies for clean technologies and strategic industries.

Political shifts are also influencing climate policy, with populist parties gaining ground in 2025 and mixed levels of support for decarbonisation across regions, continued EU backing contrasts with increased UK opposition.

Climate impacts also remain severe; January 2025 recorded temperatures 1.75°C above pre industrial levels, and Storm Éowyn highlighted the increasing risks of extreme weather.

Electricity networks investments

Global investment in electricity networks is increasing, driven by decarbonisation, electrification, rapid growth in renewable generation, and the need to strengthen resilience against extreme weather.

In Ireland, strong economic and population growth (along with housing targets) further amplifies network investment requirements and raises questions about future regulatory and funding models.

Across Europe, delivery of grid infrastructure continues to face constraints, including supply chain pressures, planning delays, social acceptance challenges, and shortages of skilled labour.

Grid investment momentum is increasing, and in July 2025, Ireland approved private electricity lines for public benefit to support direct generator–customer connections, hybrid grids, and EV charging.

Renewable developments

Global renewable energy deployment continues to grow strongly, but progress remains uneven. In early 2025, renewable generation increased faster than global electricity demand, slightly reducing fossil fuel use.

However, the International Energy Agency revised its 2030 outlook downward by 900 GW due to weaker prospects in the US and China. Solar remains the dominant and lowest cost technology globally, though further integration into grids requires smarter technologies and supportive policies.

Ember – a leading energy thinktank forecasts that fossil fuel demand could peak by 2030 if current trends persist.

Despite this momentum, offshore wind faces rising costs, supply chain pressures, and limited subsidies or revenue guarantees in several European markets. Reduced participation from oil and gas majors is shifting opportunities toward technology focused and industrial players.

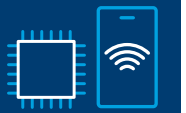
Economic/ financial backdrop

Inflation rates continued to fall in 2025 while interest rates were relatively stable.

Economic growth across Europe and the UK was subdued, while Ireland's economy and fiscal position remained comparatively strong despite emerging risks.

Growth is expected to continue into 2026, but geopolitical tensions and trade tariffs present ongoing challenges.

Technology adoption



In 2025, falling solar and battery storage costs supported faster renewable deployment globally and in Ireland.

Progress in hydrogen slowed, however, as projects were cancelled due to difficulties securing long-term offtake agreements.

Electricity demand from data centres continued to rise worldwide and in Ireland, driven by the rapid growth of AI. Data centres are increasingly shifting from being large, inflexible baseload users to becoming more dynamic grid partners by using AI, flexible workloads, and dynamic tariffs to support grid stability and renewable integration.

Foreword

FOREWORD

Sinéad Kilkelly

Executive Director, People & Sustainability

"I am proud of the progress and confident in the culture and capability we are building for the years ahead."

Sinéad Kilkelly

2025 was a year of embedding sustainability into how we work, lead, and make decisions. Across our organisation, colleagues continued to take responsibility; delivering on sustainability, improving data quality, strengthening governance, and bringing our Net Zero 2040 Strategy to life in practical, meaningful ways.

What stands out most to me is the collective momentum. Whether progressing renewable integration, strengthening biodiversity stewardship, modernising networks, or deepening our engagement with customers and communities, progress has been broad, disciplined and authentic.

We also made strong strides in people-centred sustainability. We advanced our DEI agenda and continued to address gender representation and pay transparency with openness. We strengthened our approach to Human Rights Due Diligence (HRDD), aligning our processes with the UN Guiding Principles and OECD guidance. Across the business, we engaged our people in the development of our new Safety, Health and Wellbeing Strategy and maintained ISO 45001 certification, reinforcing that caring for our colleagues, contractor partners and the public remains fundamental to how we operate.

The energy transition is delivered by people; engineers, project managers, network crews, customer teams and support functions all play a role. In 2025, we continued to invest in learning, leadership development and capability building through programmes such as our Navigator programme, recognising that delivering Net Zero 2040 requires long-term skills, resilience and confidence.

As we prepare for CRSD-aligned reporting, I want to acknowledge the significant effort across ESB to strengthen transparency, governance and internal controls. Our double materiality assessment has sharpened our focus on the impacts, risks and opportunities that matter most. This work is not just compliance; it is about trust, internally and externally, and about strengthening our licence to operate as a long-term energy infrastructure provider.

2025 showed what is possible with a strong vision and aligned leadership. I am proud of the progress and confident in the culture and capability we are building for the years ahead.

"The energy transition is delivered by people; engineers, project managers, network crews, customer teams and support functions all play a role. In 2025, we continued to invest in learning, leadership development and capability building."

Sinéad Kilkelly

Foreword continued

FOREWORD

Paul Stapleton

Executive Director, Group Finance

"Strengthening resilience, improving data integrity and aligning capital with long-term decarbonisation objectives enhances ESB's competitiveness and financial durability."

Paul Stapleton

This year marked a significant strengthening of ESB's sustainability governance and reporting architecture. The transition toward CSRD-aligned, audit-ready disclosure represents a new level of discipline, one that mirrors the expectations applied to financial reporting and reinforces confidence in the integrity of our disclosures.

We have enhanced data governance across the Group, clarifying ownership at source, strengthening internal controls and preparing for limited assurance from 2027. Sustainability risks are embedded within our enterprise risk management framework and overseen at Board and Committee level. Climate transition and physical risks are assessed using recognised scenario methodologies and integrated into financial planning and capital allocation.

Sustainability is increasingly shaping ESB's financial profile. Our Net Zero 2040 Pathway is embedded in strategic and investment decisions across generation, networks and customer solutions. Independent benchmarking of our transition plan, including Moody's Net Zero Assessment, provides external validation of our direction of travel.

At the same time, we remain clear-eyed about the challenges ahead, including the complexity of Scope 3 emissions and the scale of capital investment required for system transformation.

High-quality sustainability data now informs project appraisal, risk analysis, EU Taxonomy alignment reporting and access to sustainable finance.

What I see across the business is a maturing capability, one that understands that sustainability and finance are interdependent. Strengthening resilience, improving data integrity and aligning capital with long-term decarbonisation objectives enhances ESB's competitiveness and financial durability.

We are on the right path. While significant work remains, the progress made in 2025 demonstrates that ESB is building the governance, systems and discipline required to navigate a rapidly evolving regulatory and market environment.

Together, we are proud to present ESB's 2025 Sustainability Report.
It reflects the commitment of our people, the strengthening of our governance, and the clarity of our strategic ambition.

The scale of transformation across the energy system is considerable. But ESB is building the capability, culture and financial discipline required to deliver reliable energy today while progressing credibly toward a resilient, inclusive and net-zero future for the customers and communities we serve, for future us.

Sinéad Kilkelly

Executive Director, People & Sustainability

Paul Stapleton

Executive Director, Finance

Sustainability in context

In this section

About this report

Basis for preparation

BP-1 and BP-2

The purpose of this section is to set out how we prepare our sustainability report, including the scope of consolidation, the upstream and downstream value chain information and applicable timeframes. We will comply on a voluntary basis, as a statutory corporation, with the Corporate Sustainability Reporting Directive (CSRD) for 2027 FY reporting in the 2027 annual report. In the interim we will publish a CSRD aligned Sustainability Report in 2025 and 2026. Some disclosures are not included this year as we further develop the necessary methodologies and systems. This Sustainability Report does not require an external limited assurance review.

The scope of this report includes our own operations, along with our upstream and downstream value chains. The double materiality assessment (DMA) outlined in IRO-1 includes impacts, risks and opportunities (IROs) that extend across our full value chain. Material IROs identified for each topic can be found within those topics throughout the report.

For the purposes of this report own operations includes ESB parent undertaking and all its subsidiary undertakings. Our sustainability data is prepared on a consolidated basis which is the same as our financial statements. Consolidated sustainability data points do not include associate and joint venture data unless otherwise stated.

The time horizons used in the preparation of this report are within one year as short-term, one to five years as medium-term and more than five years for long-term, as aligned to ESRS guidance, unless otherwise stated.

We have developed processes for collecting, reviewing and validating data in this report. We continue to evolve and embed these procedures to improve data accuracy and control. Where direct data is not readily available, we use estimates in the reporting of certain data points. Estimates and underlying assumptions are based on historical experience and knowledge determined by management and reviewed on an annual basis.

Data governance has been enhanced and is underpinned by defined ownership at source, quality review controls and external review on key ESG indicators in preparation for limited assurance under CSRD from 2027 onwards.

This standalone sustainability report, aligned with the CSRD, aims for a balance of ambition, efficiency, and strategic flexibility.

Photo credit

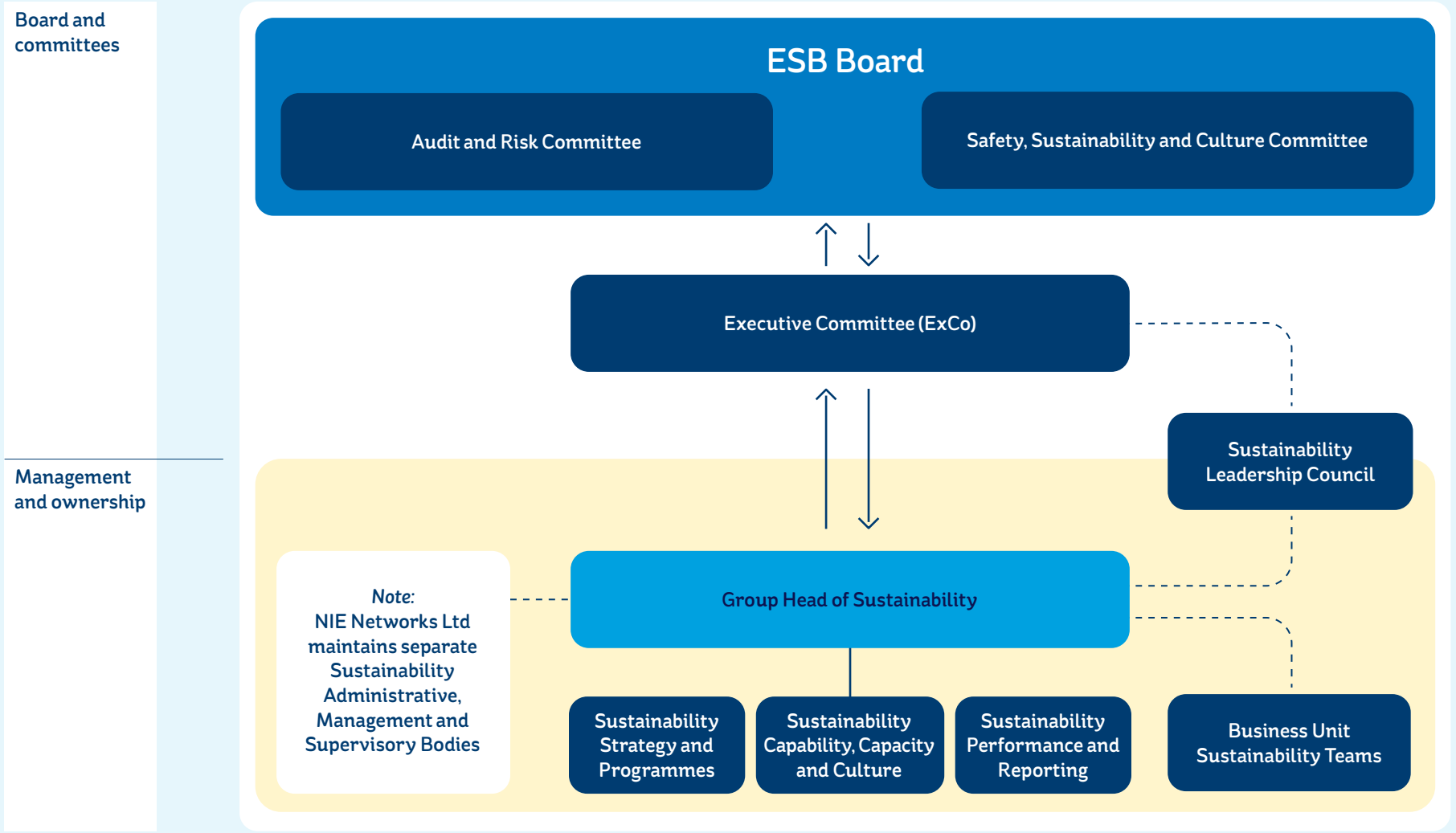
Thanks to Peter O'Hagan.

Sustainability governance

Our sustainability governance framework

Governance of sustainability within ESB is now embedded across Board, Committee, and Executive levels, with clear accountability for delivery and disclosure. This includes new management-level structures and roles introduced over the past two years, such as the Centre of Sustainability established in 2024 and the Sustainability Leadership Council at the end of 2025, which further strengthened our organisational oversight.

GOV-1



Sustainability governance continued

Roles and responsibilities

GOV-1 and GOV-2

ESB Board

The ESB Board has ultimate responsibility for and oversight of sustainability matters and related IROs. It receives updates on sustainability matters throughout the year and also receives annual training to augment its understanding and expertise on key sustainability matters. Board training in 2025 focused not only on substantive sustainability topics but also on CSRD readiness, an area where expectations and scrutiny continue to rise.

The Safety, Sustainability, and Culture (SSC) Committee

The Safety, Sustainability and Culture Committee assists the Board in fulfilling its oversight responsibilities in respect of reviewing the strategies, policies, programmes, risks, targets, and performance of the Company in relation to sustainability.

Audit and Risk Committee (A&RC)

The A&RC advises the Board on high-level risk-related matters, including sustainability risks, and monitors the quality and integrity of the sustainability reporting of the Company, in particular whether the company has followed appropriate sustainability standards and made appropriate estimates and judgements.

The Executive Committee (ExCo)

The ExCo has overall executive responsibility for the development of sustainability strategies, policies and plans, including the management and oversight of IROs. The ExCo reviews sustainability progress including performance against targets and considers the sustainability aspects of business decisions. Sustainability performance indicators are incorporated into senior leadership objectives, reinforcing shared accountability for delivery of ESB's Net Zero and sustainability targets.

Finance & Investment (F&I) Committee

The F&I committee is responsible for assessing new investment opportunities, partnerships, joint ventures and significant acquisitions and disposals in the context of the Board's approved strategy, including assessing sustainability risks and impacts. In particular, in relation to funding/treasury activities, it has responsibility in examining key policy issues including credit/climate risk ratings.

Sustainability Leadership Council (SLC)

2025 saw the agreement to develop an SLC to provide cross-company leadership and direction at the senior manager level to enable ESB to deliver leading sustainability performance. The SLC will be stood up in 2026 as part of the transition to business as usual and will monitor external sustainability developments and perspectives, and gather insights to feed into ESB's ambition and approach on Sustainability. The new Sustainability Leadership Council brings together senior leaders to test assumptions, challenge performance and ensure emerging issues are surfaced early.

The Centre of Sustainability (CoS)

The CoS serves as ESB's strategic hub for driving sustainability initiatives across the organisation. Led by the Group Head of Sustainability, who reports to the People and Sustainability Director, it is responsible for delivering ESB's sustainability vision, programmes, and compliance. CoS fosters capability and culture, ensuring sustainability is embedded throughout ESB's operations, and supports the development and implementation of robust sustainability frameworks and reporting.

Business Unit Sustainability Managers

Business Unit Sustainability Managers are strategic leaders who drive sustainability within their functions. They deliver sustainability strategy and programmes, oversee compliance, and nurture capability and culture at the business unit level. By aligning unit activities with ESB's sustainability goals, they embed sustainable practices and support the organisation's long-term success. Through the Centre of Sustainability management forum, Business Unit Sustainability Managers review progress, share ideas, and encourage collaboration across business units.

Enhancing our sustainability journey

2022 — 2023–2025 — 2026–2028

Our commitment

Declared our commitment to being Sustainable and Socially Responsible.

We committed to:

Playing a full role in building a resilient electricity system of the future

Enhancing nature and supporting communities where we operate

Empowering our people to act sustainably

Sustainable & socially responsible

Step forward on social and environmental responsibility, cultivating a safe, sound and sustainable ethos in line with our values

Read more on our website

STEP delivery

Building our sustainability capability, capacity, and culture.

1 Enduring Sustainability Operating Model

2 Sustainability reporting capability (CSRD focus)

3 Leadership, understanding and engagement

4 Related deliverables (reports, analysis, IT etc)

STEP

Sustainability Transformation Enablement Programme

Where we're going

We are now moving from programme to practice.

Sustainability embedded in ESB decision-making and ways of working – driven by our Sustainability Operating Model and informed by leading practice including CSRD.

Read about our Sustainability Governance framework on page 13 of this report

Awareness **Desire** **Knowledge** **Ability** **Reinforcement**

Stepping forward on our sustainability journey

As part of our commitment to a net zero future, the Sustainability Transformation Enablement Programme (STEP) was launched in 2023. The purpose of the programme was to embed sustainability and social responsibility across all roles and to establish robust sustainability performance reporting.

As STEP concludes in 2025, we move decisively from programme mode to a new phase of embedded sustainability leadership. STEP has strengthened the foundations, capabilities, performance frameworks and culture needed to make sustainability a core organisational principle rather than a standalone initiative. The focus now shifts to transparency, delivery, and continuous improvement as sustainability becomes fully integrated into everyday operations and decision-making.

We are now well positioned to meet stakeholder expectations, regulatory requirements (including the EU CSRD), and our own ambition to lead in sustainability performance and disclosure. STEP has delivered a Sustainability Operating Model including a new Centre of Sustainability, a strengthened sustainability reporting framework, and an organisation-wide engagement and learning programmes. This has enabled clearer governance and accountability for sustainability across all business unit and corporate functions.

Embedding the transition to new sustainability standards has created new operational demands for systems, skills, and shared accountability. These learnings now shape how we govern sustainability at scale.

Our strategy

Sustainability within ESB's strategy and business model

SBM-1

Sustainability is embedded within the corporate strategy and business model of ESB and is fundamental to how the organisation creates long-term value.

Driven to Make a Difference: Net Zero by 2040
ESB's strategy, *Driven to Make a Difference: Net Zero by 2040*, positions the energy transition and climate action at the core of the Group's strategic direction. This reflects our role as an integrated electricity utility operating across generation, networks and customer solutions. The strategy establishes three strategic objectives: decarbonised electricity, resilient infrastructure, and empowered customers, which directly shape our business activities, investment priorities and value proposition. Strategic targets in this report are those in place at 31 Dec 2025. These were under review at time of preparing this report, so are subject to change.

Sustainability is further embedded through the strategy's foundational capabilities, including the explicit commitment to operate as a sustainable and socially responsible organisation. This ensures that environmental, social and governance considerations are an integral part of the integrated business planning process, capital allocation, risk management and performance oversight at Group and business-unit level. Sustainability-related impacts, risks and opportunities are considered alongside financial and operational factors in strategic and operational decision-making.

The Sustainability Leadership Plan
Our Sustainability Leadership Plan (SLP) provides the framework for embedding sustainability across the organisation and value chain. As the core framework supporting the 'Sustainable and Socially Responsible' capability within our corporate strategy, Driven to Make a Difference: Net Zero by 2040, the SLP sets out how sustainability is integrated into our operations. While our net zero strategy sets out our decarbonisation ambition, the SLP defines how we will deliver this transition in a responsible and sustainable way.

The SLP takes a holistic approach across three pillars: Planet, Place and People, and outlines eleven focus areas spanning climate action, circularity, biodiversity, pollution, water, community and people, underpinned by a crosscutting "Making it Happen" pillar focused on governance, decision-making and leadership.

Our newly established Sustainability organisation leads four core workstreams:

- Climate Action
- Biodiversity
- Resource Use & Circular Economy
- People Centred Sustainability.

Through these, we commit to decarbonising our operations, regenerating natural systems, supporting communities and embedding sustainability as a core business capability.

Our strategy continued

Our **Strategic objectives** and **Foundational capabilities** are referenced throughout this document wherever you see these icons.

SBM-1

ESB's Strategy

Driven to make a Difference: Net Zero by 2040

Strategic objectives

Decarbonised electricity

Develop and connect renewables to decarbonise the electricity system by 2040

UN SDG contribution

Resilient infrastructure

Provide resilient infrastructure for a reliable low-carbon electricity system

Empowered customers

Empower, enable and support customers and communities to achieve net zero

Foundational capabilities

Our people

Ensure we have the people capability to deliver our strategic objectives with a strong values-based and inclusive culture

UN SDG contribution

Digital and data driven

Leveraging data and technology, transform ESB to a data-driven digital utility

Financial strength

Maintain the financial performance and strength required to deliver our purpose

Sustainable and socially responsible

Step forward on social and environmental responsibility, cultivating a safe, sound and sustainable ethos in line with our values

Sustainability Leadership Plan

Planet

- Addressing climate change
- Resource use and circular economy

Place

- Biodiversity
- Pollution
- Water
- Communities

People

- Employees
- Customers
- Supply chain

Making it happen

- Sustainability governance
- External leadership

Our value chain and sustainability matters

Our value chain spans our direct operations and indirect upstream and downstream activities.

SBM-1 and SBM-3

Across our value chain, we have identified 24 material sustainability matters and 58 related IROs. These represent our material issues and guide how we deliver value under our Sustainability Leadership Plan. The relevant IROs are referenced within each topical disclosure section throughout this report.

Upstream

Supply chain and resources

The business relies on a range of natural resources – sun, wind, water and natural gas – to generate and supply energy. These resources, along with key materials such as cement, steel and other construction and operational inputs, are extracted, processed and transported through our supplier network before being used to build and operate energy infrastructure.

Over the lifecycle of these assets, materials and components ultimately reach end-of-life, where they may be reused, refurbished, recycled or disposed of. We seek to take a circular economy approach wherever feasible, prioritising reuse and recovery to reduce environmental impacts.

Own operations

Business operations

Within our direct operations, we continue to scale renewable generation while maintaining gas-powered capacity to support system security. We also develop supporting technologies – including battery storage, synchronous compensators – that enable a stable, flexible and renewable-ready power system.

ESB Networks plays a central role in enabling the transition to a clean electric future by developing a net-zero-ready electricity network by 2040. This includes connecting new renewable generation and supporting adoption of solar PV, electric vehicles, electric heating and demand-side flexibility solutions.

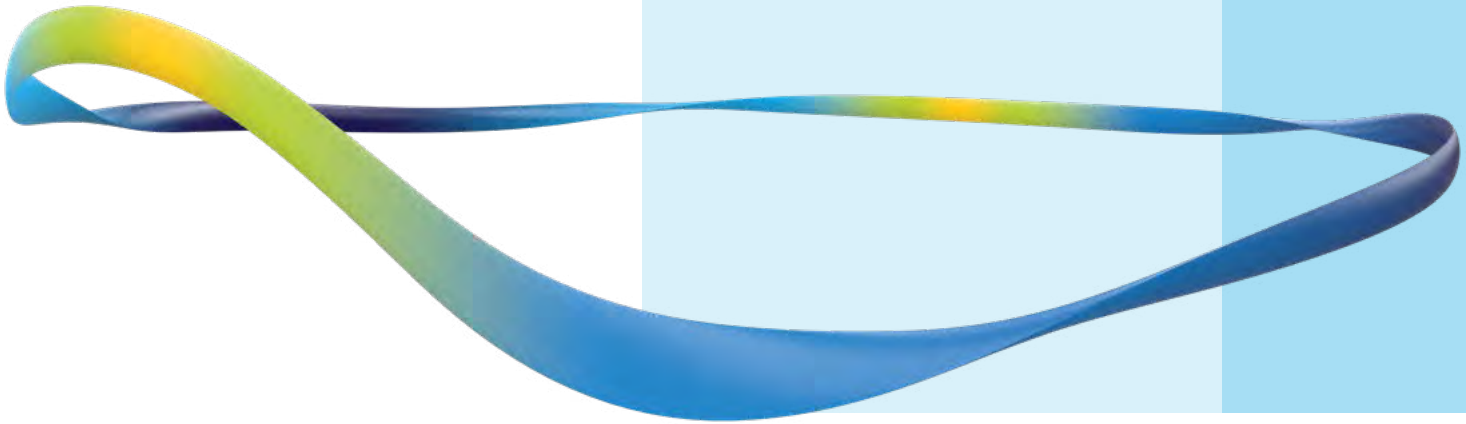
Downstream

Energy supply, products, services

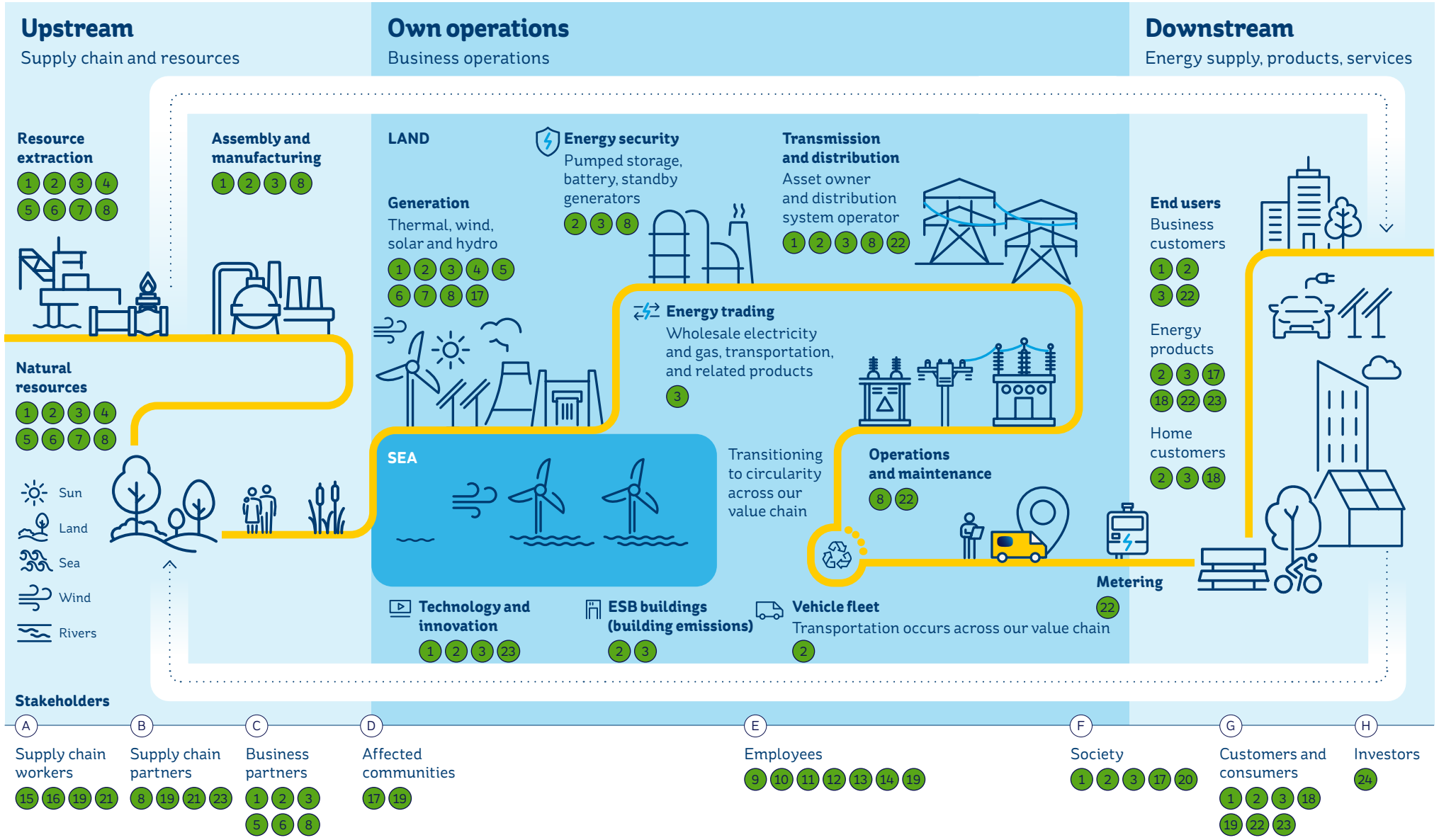
We supply electricity and gas to over two million customers and support them to reduce emissions through energy-efficiency initiatives, electrification solutions and behavioural-change programmes.

Our ability to create value depends on our employees and wider stakeholder ecosystem, including customers, investors, governments, regulators, suppliers, customers and communities.

Our strategy recognises that achieving net zero by 2040 must be done in a way that is sustainable and socially responsible. Our stakeholder groups influence and are affected by our transition to a net-zero electricity system. The Sustainability Leadership Plan sets out priorities across Planet, Place and People, guiding actions to protect ecosystems, support communities and ensure a fair, inclusive transition across the value chain.



Our value chain and sustainability matters continued



Material Sustainability Matters

1. Climate adaptation
2. Climate mitigation
3. Energy
4. Direct impact drivers of biodiversity loss
5. Impacts on the state of species
6. Impacts on the extent and condition of ecosystems
7. Impacts and dependencies on ecosystem services
8. Resource inflows, including resource use
9. Secure employment*
10. Adequate wages*
11. Health and safety*
12. Collective bargaining, including rate of workers covered by collective agreements*
13. Training and skills development*
14. Gender equality and equal pay for work of equal value*
15. Working conditions**
16. Other work-related rights**
17. Communities, economic, social and cultural right
18. Social inclusion of consumers, and/or end-users
19. Corporate culture
20. Political engagement
21. Corruption and bribery
22. Investing in modern, reliable infrastructure and developing a smart and flexible electricity network
23. Innovation and digitalisation
24. Sustainable finance

* Own workforce.
** Workers in the value chain.

Our double materiality assessment

As part of CSRD preparations, we undertook a Double Materiality Assessment (DMA) to identify the sustainability topics which are material to the business and our stakeholders. The DMA determines which topics, and their associated Impacts, Risks and Opportunities (IROs), must be reported under the European Union Sustainability Reporting Standards (ESRS) reporting requirements.

The DMA assesses both:

- impact materiality, how ESB's activities affect people and the environment, and;
- financial materiality, how sustainability factors may create financial risk or opportunities for the business.

A topic is considered material if it is significant in either dimension or both. This ensures that our reporting focuses on the issues that matter most to ESB and its stakeholders, guiding our strategy and disclosures.

The Double Materiality Assessment process

The DMA was conducted in accordance with the requirements of the ESRS.

We have outlined below the different stages and steps carried out to conduct the DMA:

1 Understanding the Context: Top-Down Assessment

- We conducted an assessment of peers to understand topics they report on and therefore potential areas for ESB
- We reviewed Sustainability Accounting Standards Board (SASB) standards, media articles and our own previous materiality assessment
- From this work, we identified topics relevant to us for which IROs were developed.

2 Value Chain and Stakeholder Analysis

- We prepared value chain maps and identified key actors
- These were validated through workshops across the business
- We assessed the impact of each actor and ESB's dependency on that actor
- This informed which value chain actors should feed into the development of IROs
- We determined which actors should be considered in the development of IROs
- We determined the stakeholder groups, numbers and engagement approach.

3 Identifying and Validating IROs

- We identified a comprehensive list of IROs linked to relevant topics from the Top-Down Assessment and established time horizons for each
- Using ESG data from ESB, external sources, and the Enterprise Risk Management system, we determined IROs through both internal and external ESG reporting
- Workshops with key business stakeholders reviewed the IRO list, confirmed their relevance, and addressed any omissions.

4 Stakeholder Engagement and Assessing Materiality

- We conducted a DMA for each IRO and validated the results
- We identified and interviewed or surveyed key stakeholders
- We collected feedback on topic materiality from stakeholders, which led to updates in IRO scores as needed.

5 Validation and Approval

- We validated IROs and material topics through discussions with management
- A report was prepared on the DMA process and results
- These results were presented to ExCo, Audit & Risk, and SSC Committees
- The DMA was approved by Executive Director, Group Finance and Commercial and the Executive Director, People and Sustainability.

Our double materiality assessment continued

Methodology

IRO-1

The DMA was completed in 2024 through intensive engagement with internal and external stakeholders to assess IROs across our entire value chain, including upstream, downstream and own operations. The assessment considered short-, medium- and long-term time horizons, and examined both the effects of our activities on society and the environment and the potential financial implications of sustainability-related factors. The definitions of our time horizons can be found on page 32. The process followed best practice and European Financial Reporting Advisory Group (EFRAG) guidance, involving over 90 external participants through interviews and online surveys and more than 70 internal stakeholders via interviews, workshops, and online surveys.

Outcome

The DMA results are shown in the matrix to the right aggregating per ESRS topic.

The analysis identified eight ESRS topics as material, along with three entity-specific topics: investing in a modern, reliable infrastructure; innovation and digitalisation; and sustainable finance. All eight topics and two entity-specific topics are material from both a financial and impact perspective. Sustainable finance was found to be material only from the financial perspective.

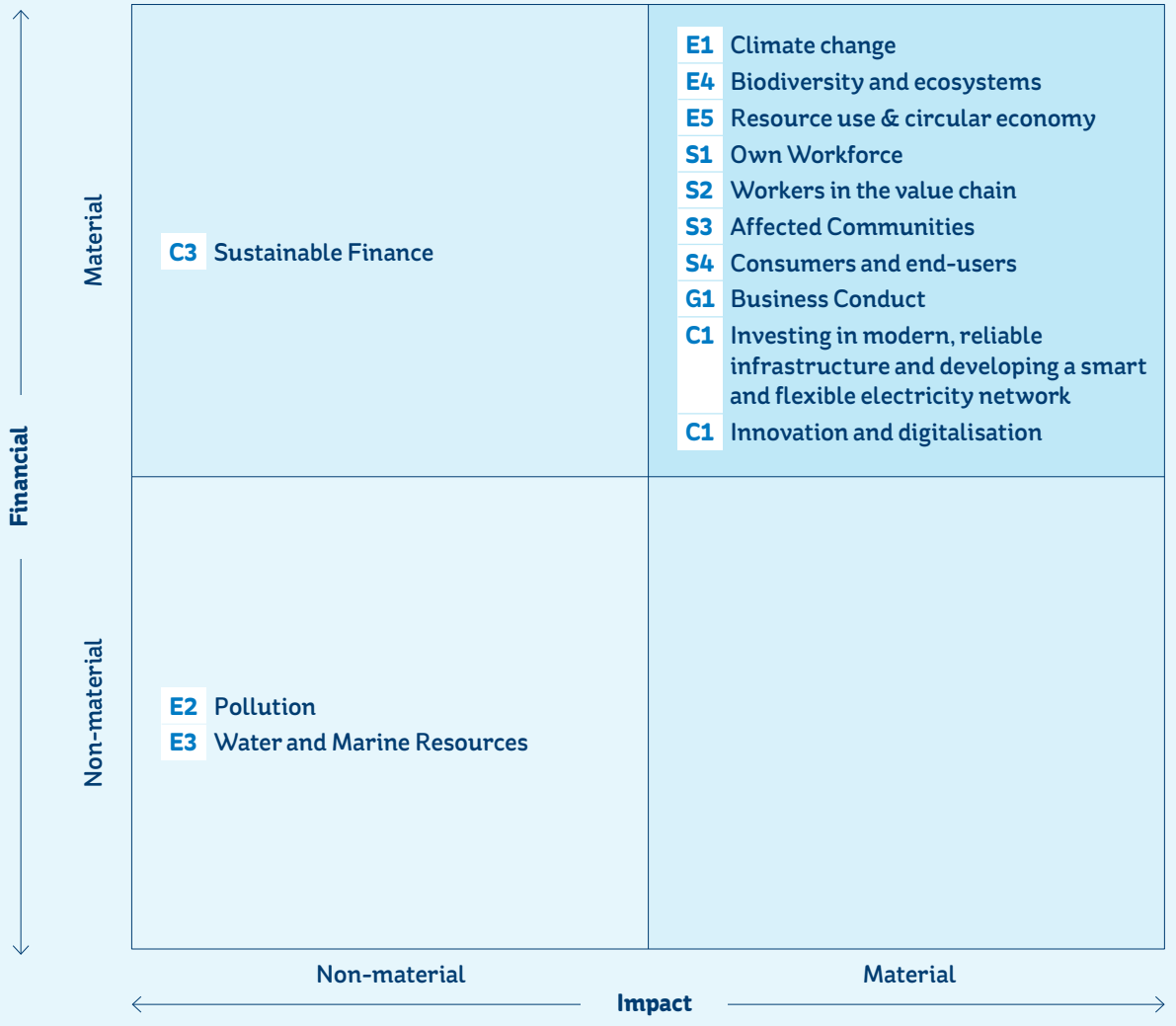
The ESRS topics deemed not material to ESB were ESRS E2 Pollution and ESRS E3 Water and Marine Resources.

Review and Approval

Following completion of the DMA process, the final results went through a formal review and approval process. We plan to revisit the DMA process during 2026 to ensure we continuously monitor our impacts, risks and opportunities and reflect material information in our annual and sustainability reports.

ESB Materiality Assessment Outcome

Note – The topics above are shown in chronological order and do not indicate any variation in levels of materiality.



Sustainability risk management

IRO-1

We have a well-established risk management framework that provides clear lines of accountability to ensure that we deliver on our strategic objectives. Sustainability risks are primarily identified, assessed, and managed through the Group-wide, top-down strategic risk framework, complemented with the bottom-up identification and reporting of risks at the business unit level. This governance framework supports our commitment to robust risk management and continuous improvement in sustainability performance.

At a business unit level, we adopt an integrated approach ensuring that each business unit is empowered to identify and manage sustainability-related risks in alignment with our overarching sustainability strategy. This approach allows business units to respond to emerging risks with agility and effectiveness, and ensures the comprehensive identification, management and mitigated of risks.

Oversight of the risk process is maintained through the Executive Committee, who collectively ensure that sustainability risks are addressed and incorporated into strategic decision-making. Sustainability-related risks and opportunities are integrated into our Risk Universe and monitored through quarterly updates linking climate, biodiversity, resources and social risks to strategic, financial and operational risk categories.

Sustainability reporting, transparency & assurance
We are committed to comprehensive and meaningful sustainability reporting and continue to advance our work to deliver CSRD-compliant sustainability statements. In February 2025, the EU Commission published its Omnibus Simplification Package aimed at streamlining a number of sustainability regulations, including the CSRD. We support the proposed changes and believe the proposals offer a proportionate approach. While waiting for the proposed changes to be finalised, we have continued our programme of work to implement a robust sustainability reporting framework. This sustainability report reflects current best practice trends and maintaining momentum toward eventual full compliance with the CSRD. We will continue to closely monitor sustainability regulation developments.

IROs and policies
Comprehensive detail on our material IROs and relevant policies are provided within the relevant topical disclosure chapters of this report.

Core components of ESB's Risk Management Framework

To learn more about corporate risk management, see our Annual Report, page 23
Click here to download

Risk Principles/Strategy and Business Plans
Articulates the purpose of risk management and how it supports the delivery of business objectives.

Risk Governance and Culture
Defines the governance and organisational structure to oversee risks, including the role of the Three Lines. Sets out the risk culture of ESB.

Risk Taxonomy
Sets out the types of risks that ESB is exposed to (Risk Universe).

Risk Appetite and Risk Tolerance
Sets out ESB's appetite for risk and the ranges and limits of acceptable risk taking.

Risk Policies and Procedures
Defines approach to monitoring and controlling risk.

Risk Management Processes
Tools that help managers identify and evaluate risks to which ESB may be exposed. Reporting and reviewing ongoing and emerging risks and assessing risk positions to the risk appetite targets and limits. The determination of sustainability-related IROs is considered within this broader risk management framework, ensuring that material sustainability topics are identified, assessed, and managed in line with ESB's overall risk governance approach.

Stakeholder engagement

We recognise that our activities influence and impact a wide and diverse range of stakeholders, and therefore place strong emphasis on maintaining open, constructive, and ongoing dialogue. This engagement is central to shaping our strategic direction, ensuring that decisions reflect stakeholder expectations while supporting the organisation's long-term sustainability. Regular feedback enables us to refine our approach, respond to emerging concerns, and support a collaborative, just and affordable transition to a low-carbon future.

We endeavour to understand stakeholder expectations as part of our operating model. Understanding our stakeholders' expectations and concerns is at the forefront of everything we do. We undertake comprehensive stakeholder research approximately every four years and conduct public surveys three times annually through brand and reputation tracking exercises. Additionally, analysis completed in 2024 as part of ESB's DMA enabled us to identify and prioritise key issues.

SBM-2

Our key stakeholder groups are outlined to the right, each with tailored engagement approaches and specific reasons for engagement.

Stakeholder Group	Customers	Communities	Stockholders	Debt investors and Rating Agencies	Supplier, Contractors and Partners	Employees	Regulators and Authorities	Industry Bodies and Non-Governmental Organisations (NGOs):
How we engage	Surveys Research Focus groups Digital channels Dedicated account managers to remain responsive and customer focused	Consultations Corporate partnerships Open days Volunteering Community funds	Formal briefings Consultations Written submission Attendance at the Annual General Meeting (AGM)	Announcements Roadshows, briefings Investor relations activities	Tenders Contract reviews Market consultations Events	Manager discussions Performance reviews Staff surveys Webcasts Employee network Trade union engagement	Briefings Forums Inspections Compliance reviews	Industry groups Ongoing dialogue with NGOs
Why we engage	To understand current and evolving needs – particularly amid energy price pressures and the ongoing transition to sustainable energy.	To foster positive relationships and ensure the company contributes meaningfully to local wellbeing.	To maintain transparency regarding performance, strategy, and sustainability commitments.	To communicate financial and sustainability performance, while strengthening market confidence and understanding among lenders and analysts.	To ensure high standards in safety, ethics, quality, and sustainability, while maintaining resilient supply chains.	To build, maintain and retain a skilled and motivated workforce.	To influence and respond to policy development and support regulators with evidence-based decision making.	To shape best practice and advance the transition to a sustainable, low-carbon energy system.

Photo credit
Thanks to John Wallace.

Environment

In this section

E1 Climate change

Photo credit
Thanks to David Deally.

Topical disclosure structure

Why this matters

As Ireland's leading energy provider, we recognise both the urgency of the global climate crisis and the pivotal role that electricity plays in addressing it.

Climate change is one of the defining challenges of this generation, and electricity is central to addressing it. As Ireland's leading energy provider, ESB has a pivotal role in enabling the transition to a low-carbon economy by decarbonising the electricity system and supporting the electrification of heat, transport and industry. At the same time, we must manage the growing physical risks of climate change, including extreme weather and its impacts on infrastructure, operations and communities. Effectively addressing climate change is therefore both an environmental imperative and a strategic necessity to secure a resilient, future-proof business and deliver long-term value for customers and society.

Our Driven to Make a Difference: Net Zero by 2040 Strategy establishes climate action as ESB's core strategic objective, with a clear commitment to achieve net zero emissions across the Group by 2040. This ambition is underpinned by our Net Zero Pathway Report, which sets out the key technical, operational and investment milestones required to transform generation, networks and customer solutions. Together, these define what we must achieve and how the electricity system will be reshaped to support Ireland's low-carbon future, aligned with the UN SDGs, particularly SDGs 7, 9 and 13.

Our approach

We are delivering this transition through three strategic objectives:

1. decarbonising the electricity system, by developing and connecting renewable generation at scale;
2. building resilient infrastructure, through sustained investment in secure, flexible and smart networks and energy storage; and
3. empowering customers and communities, by enabling more efficient and sustainable energy choices.

Climate action sits at the heart of our Sustainability Leadership Plan and Planet pillar, recognising its close interconnection with biodiversity, resource use, community resilience and social equity. By embedding climate considerations into governance, business planning, investment decisions and performance management, and by strengthening internal capabilities through innovation, digitalisation and financial resilience, we are ensuring progress towards net zero is credible, resilient and aligned with long-term value creation.

E1 Climate change continued

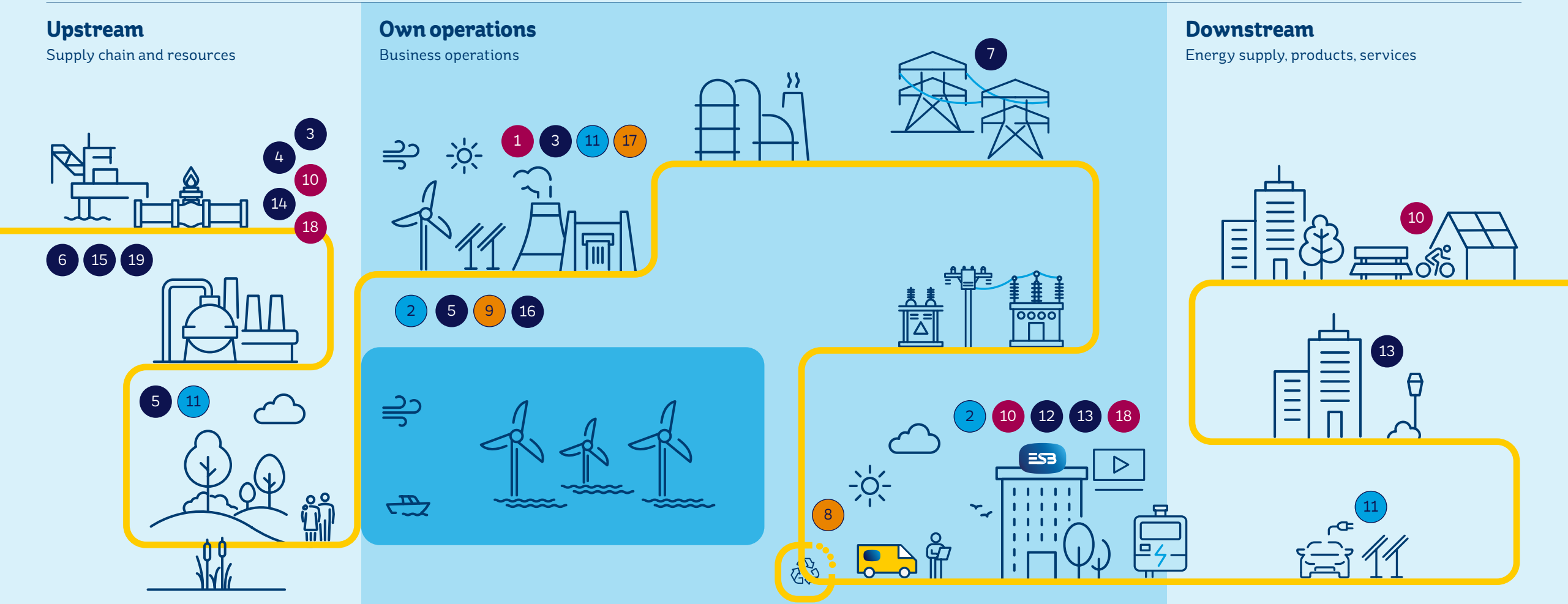
Material impacts, risks and opportunities

Key to IROs
- Negative impact
- Financial risk
- Positive impact
- Financial opportunity

Upstream
Supply chain and resources

Own operations
Business operations

Downstream
Energy supply, products, services



Stakeholders affected
- (C) Business partners
- Government

Stakeholders affected
- (F) Society
- (G) Customers and consumers

E1 Climate change continued

Material impacts, risks and opportunities continued

As part of our Double Materiality Assessment (DMA), we've identified climate-related impacts, risks, and opportunities (IROs) throughout our value chain that are material to our business. These IROs encompass climate change mitigation, energy, and climate change adaptation. You can see more about our materiality assessment methodology on pages 20–21. The table to the right shows the outcomes related to E1 Climate Change from this assessment.

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Key to IROs

- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Timeframe

S	Short term
M	Medium term
L	Long term

Value chain location

U	Upstream
O	Own operations
D	Downstream

Material IRO (E1-SBM-3)		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matter: 1 Climate adaptation				
1	**Negative impact through damage to local environment** – damage caused by location and operation of power generation facilities and networks during flooding and other climate events		S	O
2	**Opportunity for financial savings through investment in climate adaption technology** – opportunity to invest in emerging technologies with the potential to establish a 'future-proof' business model that is resilient to the threats posed by climate change		M	O
3	**Financial risk associated with adaptation and mitigation measures** – investment risk due to the large capital outlay associated with investment in growth of the electricity sector and adaptation measures for physical assets and technology		M | L	U | O
4	**Operational risk** – risk to developing and deploying renewable infrastructure caused by legislative delays		L	U
5	**Risk of climate change physical and/or major environmental incidents** – increasingly extreme and unpredictable weather patterns, and/or major environmental incidents (e.g. flooding, oil spill), resulting in supply chain disruption and impacting performance of assets and societal energy security		M	U | O
6	**Risk of downturn in economic conditions and public finance support** – a downturn in the Irish and UK economies may adversely impact climate adaptation investment/transition plans. The availability of public funding/attitudes of elected government therefore serve as a dependency for ESB's transition plan		M	U
7	**Risk of non-compliance with laws, regulations, licences** – risk of failure to comply with applicable legal and governance obligations whether imposed by law, regulation or licence		M	U | O
Sustainability matter: 2 Climate mitigation				
8	**Positive impact through role in national climate transition plan** – positive impact through role in the delivery of Ireland's national climate transition plan by providing renewable electricity and network infrastructures to support renewable connections		L	O
9	**Positive impact on climate change mitigation** – positive impacts created through reduction in usage of fossil fuels in own operations		S	O
10	**Negative impact from energy usage and GHG emissions** – emissions are associated with own operations, and the upstream and downstream value chain		S	U | O | D

E1 Climate change continued

Timeframe
S | Short term
M | Medium term
L | Long term

Value chain location
U | Upstream
O | Own operations
D | Downstream

Material impacts, risks and opportunities continued

Material IRO E1-SBM-3		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
11	**Opportunity to generate a commercial advantage** – advantages created through the increasing electrification of energy		M | L	U | O | D
12	**Financial risk associated with adaptation and mitigation measures** – investment risk due to the large capital outlay associated with investment in growth of the electricity sector and adaptation measures for physical assets and technology		M	O
13	**Climate transition risk** – failing to meet the sustainability targets from our net zero strategy or to inform or respond to climate change policies and/or capture opportunities and manage challenges in those policies. This could result in reduced performance along with public, customer and investor concerns		S | M | L	O | D
14	**Risks associated with the delivery of a renewable pipeline, including project quality management** – failing to deliver the scale and manage the project quality of renewable generation assets required to meet market and societal needs and achieve strategic objectives		M	U
15	**Risk relating to availability of capital and expertise** – we rely on partners to develop products and services which are critical to business operations. Without these partners, we may not be able to develop renewable energy		M	U
16	**Security of supply risk** – risk of capacity shortfall in electricity generation and/or fuel supply issues, such as insufficient generation capacity to meet peak demand, could lead to a negative impact on ESB's reputation and potential demand management measures		S	O
Sustainability matter: 3 Energy				
17	**Positive impact on long-term energy security** – generation of renewable energy and development of gas and other assets to support security during the energy transition, helping to increase Ireland's national energy security		L	O
18	**Negative impact from energy usage and GHG emissions** – emissions are associated with own operations, and the upstream and downstream value chain		S	U | O
19	**Risks associated with energy market and supply chain disruption** – there is a risk of volatility in energy markets and other elements of global supply chains resulting in effects on financial performance and ability to deliver strategic objectives		S	U

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Key to IROs
Negative impact
Financial risk
Positive impact
Financial opportunity

E1 Climate change continued

Material impacts, risks and opportunities continued

Managing our IROs

Strategic objectives	Indicator	2021 baseline	2030 target[5]
ESB has identified three strategic objectives which are core to the delivery of our net zero ambition.			
Decarbonised Electricity Develop and connect renewables to decarbonise the electricity system by 2040	Renewable and renewable-enabling generation portfolio (installed capacity)[1]	1.3 GW[2]	5 GW
	Scale of zero-carbon electricity enabled by our networks	4.7 GW in ROI 1.8 GW in NI	22 GW in ROI 2.6 GW in NI
	Share of generation output from zero-carbon sources[1]	14%	63%
Resilient Infrastructure Provide resilient infrastructure for a reliable low-carbon electricity system	Network Regulated Asset Base (RAB)	ESB Networks: €8.8bn NIE Networks £1.8bn	ESB Networks: €13–14bn NIE Networks £2.7–3.2bn
Empowered Customers Empower, enable and support customers and communities to achieve net zero	Number of smart meters installed	620,000	2.6 million
	Electrification of transport network: public EV chargers	704	3,000 (total)
	Customer satisfaction	81%	>85%

1 Joint venture projects are included in these metrics based on ESB's shareholding in the relevant entity.
2 Restated to include renewable-enabling assets (batteries and pumped storage).
3 Derived from results of Our Voice Staff Survey.
4 This metric does not include NIE Networks or So Energy.
5 Strategic targets in this report are those in place at 31 Dec 2025. These were under review at time of preparing this report, so are subject to change.

Foundational capabilities	Indicator	2021 baseline	2030 target
Underpinning the strategic objectives are four foundational capabilities which are essential to success.			
Our People Ensure we have the people capability to deliver our strategic objectives with a strong values-based and inclusive culture	Employee engagement[3]	7.0/10	>8/10
	Health and Wellbeing score[3]	6.9/10	>8/10
Digital and Data Driven[4] Leveraging data and technology, transform ESB to a data-driven digital utility	Digital maturity[4]	N/A	Mainstream/Leader
Financial Strength Maintain the financial performance and strength required to deliver our purpose	Strong investment-grade credit rating	Credit ratings of A- or BBB+ on standalone basis	BBB+/Baa1 or equivalent
	Return on Capital Employed (ROCE)	5.6%	ROCE > WACC
Sustainable and Socially Responsible Step forward on social and environmental responsibility, cultivating a safe, sound and sustainable ethos in line with our values	Carbon intensity of ESB's generation assets and activities[1]	440g CO_2/kWh	140g CO_2/kWh

E1 Climate change continued

Material impacts, risks and opportunities continued

How we manage climate change mitigation IROs

ESB's Strategy Driven to Make a Difference: Net Zero by 2040 has three strategic objectives, which align with SDGs 7, 9 and 13. These objectives are enabled by four foundational capabilities that cut across all activities and are essential to achieving our strategy. ESB is managing its material IROs through policies, actions or targets, dynamic risk management and by delivering on the strategic performance indicators (SPIs) and key performance indicators (KPIs) which underpin the strategy. The SPIs and KPIs ensure transparency and accountability in the delivery of our strategy and how we manage our IROs.

Read our Net Zero 20240 Pathway Report here

We aim to achieve net zero emissions across all operations by 2040, with a particular focus on the Decarbonised Electricity pillar of our strategy. We've created a detailed transition roadmap outlined in our Net Zero 2040 Pathway Report. We've taken comprehensive steps to identify and assess our actual and potential impacts on climate change. We've done this by thoroughly examining our greenhouse gas (GHG) emissions, through a combination of quantitative and qualitative methods. See the Climate Transition Plan on pages 31–34, where we provide further detail on how we manage our climate change mitigation IROs.

We have set ourselves a very ambitious target for 2040, but we do recognise that significant risks are present across our emissions landscape. Our generation emissions will reduce as additional renewables and zero carbon system services are added to the electricity system.

It is important to note that ESB's generation emissions will be driven by the levels of running on our fossil-fuelled thermal units, which will be influenced by our renewables rollout and the building out of renewables by others. We are cognisant of the risk that delays in adding new renewables to the electricity system would impact on the quantum of fossil-fuelled generation and emissions in the years to 2030 and to 2040. The transition to net zero requires a whole-system approach. ESB is proactively supporting and encouraging achievement of Ireland's renewable targets, through actions within its control and influence.

How we manage energy IROs

We're investing in an ever-expanding electricity network, under the Resilient Infrastructure pillar of our strategy. This will support the deployment of renewable electricity and underpins the widespread electrification of heating and transport. The network will use innovative and smart technologies to deliver a robust, reliable system – supporting Ireland's EU and national renewables and climate change targets.

We're committed to working alongside customers and communities, supporting them to achieve net zero, under the Empowered Customers strategy pillar. We're continuing investments in the national smart metering programme, electric vehicle (EV) charging infrastructure, clean energy and retrofit services for business and residential customers. We're also providing energy usage insights to customers, and growing our range of clean energy services, which are key to enabling customers and communities to make informed choices about their energy use.

How we manage climate change adaption IROs

Physical Risks and Adaptation

We've conducted a comprehensive assessment of physical climate-related risks to make sure our infrastructure and operations are resilient. This assessment evaluates the exposure and vulnerability of eligible assets to climate hazards. Our definitions and methodologies are aligned with the Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report (AR6). We analyse both acute events (e.g. heatwaves, flooding) and chronic trends (e.g. rising temperatures, coastal erosion). Analysis uses regional climate projections from the EURO-CORDEX initiative under Representative Concentration Pathway RCP 2.6 (likely range: 1.3°C to 2.4°C) and RCP8.5 (likely range: 3.3°C to 5.7°C) scenarios for 2030 and 2050.

To determine asset-level exposure, we've used spatial analysis of climate parameters and hazard likelihood. Where data is limited, we supplement projections with expert input from across the ESB Group, including the impacts they've observed. Cross-functional workshops support us to evaluate how sensitive our assets are, and our capacity to adapt to climate change. This ensures we have a robust understanding of climate vulnerabilities across our portfolio. We completed our assessment in 2023 and updated it in 2024 for newly constructed assets. The table of physical climate risks set out below is the result of this work to date.

Type	Category	Risk	Potential impact
Physical risks	Storms	Increased frequency of severe storms	Major disruption for customers and increased repair costs for networks and station assets
	Flooding	Increased riverine flooding and episodes of intense rainfall	Higher frequency of hundred-year plus flood events on rivers with dams
	Flooding	Increased riverine, pluvial, and coastal flooding	Damage to network substations, customer outages. Damage to generation assets
	Changing weather patterns	Chronic changes in climate and weather patterns resulting in reduced associated revenue wind speeds and lower river flows	Reduced renewable energy output and associated revenue

E1 Climate change continued

Climate Transition Plan

E1-1

The coming decades are critical in the global effort to limit the impacts of climate change. As a leading energy utility operating across the Republic of Ireland (ROI), Northern Ireland (NI), and Great Britain (GB), we recognise the urgency of this challenge and the scale of transformation needed to achieve a sustainable, low-carbon future. To respond to this challenge, we've committed to achieving net zero GHG emissions by 2040. This is ten years ahead of the legally binding Government targets for ROI, NI and GB.

The GHG Protocol Corporate Standard classifies a company's GHG emissions into three 'scopes'.

Scope 1 emissions are defined in the GHG Protocol as direct GHG emissions from sources owned or controlled by a company. The sources can include stationary combustion, mobile combustion, and fugitive emissions (e.g. equipment leaks).

Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heat, or cooling consumed by a company. This scope also includes Transmission and Distribution (T&D) losses on owned network assets.

Scope 3 emissions are all indirect emissions (not included in Scope 2) that occur in the value chain, including both upstream and downstream emissions. Scope 3 GHG emissions are considered as estimated emissions in comparison with Scope 1 and 2, as their calculation is based on a combination of methods and primary and secondary data. Indirect GHG emissions are a consequence of the operations of a company but occur at sources owned or controlled by another company.

In early 2024, we published our Net Zero 2040 Pathway Report (NZPR), which sets out a comprehensive and whole-system approach to our climate transition plans and objectives. Achieving net zero is inherently ambitious and challenging, and our roadmap to net zero reflects this reality by outlining credible and science-aligned routes for reducing our Scope 1 and 2 emissions. While we are continuing to develop a similarly robust pathway for Scope 3 emissions, our current focus remains on strengthening the data, methodologies, and partnerships needed to do so.

The NZPR outlines a roadmap to net zero, including intermediate reduction targets, strategic performance indicators (SPIs), and a wide range of decarbonisation levers and actions across our operations and value chain. It also highlights how we are contributing to wider societal decarbonisation by enabling customers, investing in low-carbon infrastructure, and driving innovation across the energy system.

Following the publication of our plan, Moody's Investor Services conducted an independent review in 2025. Their assessment benchmarked ESB's transition plan against global climate goals and assigned an NZ-3 Net Zero Assessment (NZA) score. NZA scores run from one (highest) to five (lowest). A score of three (significant) indicates that our ambition for Scope 1 and 2 reductions aligns with an IEA global warming scenario of 1.55°C – 1.80°C, consistent with the objectives of the Paris Agreement. This external assessment affirms the credibility of our approach and the strength of our commitment to climate action. We also recognise that a significant risk for 2040 lies in our Scope 3 emissions, those mainly associated with the upstream and downstream emissions of the fossil fuels we buy in wholesale markets and sell to end-use customers, as well as in our supply chain. Our transition plan is not static. It's embedded in our business strategy and financial planning and includes a dynamic risk assessment approach. It will inevitably evolve in response to the external environment including technological advances, policy developments, and stakeholder expectations.

Read more about our Moody's report

Transition risks and opportunities.
We are committed to achieving net zero emissions across all operations by 2040. To support this ambition and to progress our disclosures, we assess transition risks and opportunities through scenario analysis aligned with the International Energy Agency's (IEA) World Energy Outlook 2024. The IEA scenarios used are the Stated Policies Scenario (2.4°C) and the Net Zero 2050 scenario (1.5°C), both of which Ireland's Climate Action Plan and the UK Climate Change Act seek to align with. We evaluate risks for financial materiality across short-, medium-, and long-term horizons, which are defined on page 32.

E1 Climate change continued

Climate Transition Plan continued

ESB transition risk and opportunity time horizons
ESB's current definitions for short-term, medium-term and long-term time horizons are:

Short-term
0–5 years

Medium-term
6–10 years

Long-term
11–40 years

The IEA Stated Policies Scenario accounts for current energy, climate and related industrial policies that are already in place or announced. It considers the extent that these policies have adequate provisions to be implemented. The Stated Policies scenario is associated with a global temperature rise of 2.4°C by the end of the century.

As stated above, the IEA Net Zero Emissions 2050 scenario is a more ambitious scenario. It provides a pathway for the global energy sector to achieve net zero CO_2 emissions by 2050 and is consistent with limiting global temperature rise to 1.5°C by the end of the century, with limited overshoot.

The table below outlines the results of the transition risk and opportunity analysis for ESB, which we proactively manage within our risk management framework and policies. This table remains valid for 2025.

1	2	3	4
Informative	Important	Significant	Critical

				Current	Stated Policies		Net Zero 2050	
Type	Category	Risk/Opportunity	Potential Impact	2024	2030	2050	2030	2050
Transition risks	Policy	Pace of regulatory change	Potential delay in renewable energy and decarbonisation policies; mandates on and regulation of existing products and services	3	3	3	3	4
	Policy	Compliance with sustainability policy and regulatory exposure	Potential increase in costs to meet sustainability obligations and loss of value of existing gas generation assets due to regulatory exposure	3	3	3	3	4
	Technology	Pace of technological development and deployment	Potential delay in deployment of new low-carbon energy system, including network infrastructure	1	3	4	4	4
	Market	Volatility in supply chain	Increased costs and reduced availability of raw materials and services	3	3	3	4	4
Transition opportunities	Products and Services	Development and expansion of new products and services to support increased electrification	Increased demand for electrification (heat and transport), EV charging infrastructure, and consumer production and consumption services	2	3	4	4	4
	Policy/ Technology	New low-carbon investment and development energy system	Increased investment opportunities in zero-carbon generation, storage and network	3	4	4	4	4

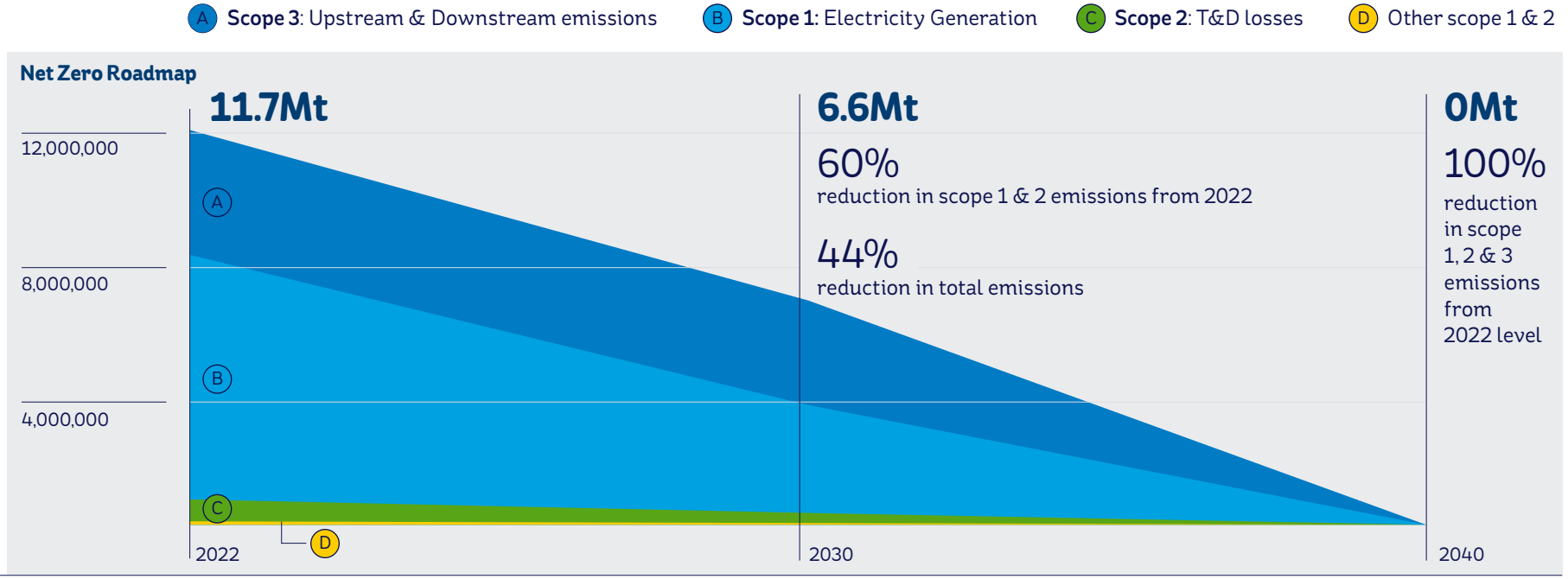
E1 Climate change continued

Climate Transition Plan continued

Ambition

At ESB, we're committed to achieving net zero across our operations by 2040. This includes decarbonising the electricity system through generation, transmission and distribution, electrifying our fleet and buildings, and engaging with suppliers and customers to reduce Scope 3 emissions.

Our approach is structured around the following decarbonisation levers (see Actions for more information) and supported by robust investment, financial planning, and performance monitoring.



Net Zero Pathway Report initiatives (2030)

B	5 GW renewables portfolio. Ending of coal generation
B	Develop hydrogen production capacity
B	Upgrade 80% of ESB Networks 10 kV network to 20 kV
D	>1,000 electric vans
D	Retrofit and improve efficiency of all ESB buildings
A	Engage with 75% of suppliers by spend
A	Enable customer adoption of efficiency and non-fossil fuel sources for heating

Near-term targets (2030)

- Up to 5 GW of renewable generation capacity operational
- 60% reduction in Scope 1 and 2 emissions from a 2022 baseline of 8 million tCO_2e
- 44% reduction in total emissions (Scope 1, 2, and 3) from 2022 levels
- 80% of residential customers on smart tariffs
- 35,000 home retrofits through Electric Ireland Superhomes
- 9,000 km of ESB Networks 10 kV network to be converted to 20 kV network from 2025 to 2030
- Engage with 75% of suppliers (by spend).

Net Zero Pathway Report initiatives (2040)

B	Transition thermal fleet to hydrogen operation
B	Build and deploy 3 TWh hydrogen storage and battery storage
D	Electrify all fleet and machinery
D	Remove SF6 emissions
A	Enable customer adoption of energy efficiency and non-fossil fuel sources for space and process heat requirements
A	Engage with 100% of suppliers by spend

Net Zero targets (2040)

- 100% reduction in Scope 1, 2, and 3 emissions from 2022 levels, dealing with any remaining residual emissions (maximum 10% of total baseline emissions) using a credible offset mechanism
- Transition of thermal generation zero-carbon fuels
- Commissioning of 3 TWh of hydrogen and battery storage capacity
- Reduce SF6 emissions with the development of new assets and in line with regulatory requirements
- Electrification of our fleet and machinery
- 100% supplier engagement (by spend)
- Electrify 2,000 vehicles by 2040.

E1 Climate change continued

Climate Transition Plan continued

Progress to date (as at end 2025)

As of 2022 (baseline year used in NZPR), ESB's total GHG emissions were 11.7 million tCO_2e, with Scope 1 emissions from electricity generation accounting for 62% of the total.

Key achievements at the end of 2025 (progress vs 2022 NZPR baseline) include:

- 28% reduction in total GHG emissions to 8.4 million tCO_2e in 2025. 37% reduction in Scope 1 & 2 emissions from a 2022 baseline of 8.1 million tCO_2e to 5.1 million tCO_2e
- Achievement of a key 2030 Net Zero Pathway initiative to end coal generation for ESB. ESB ceased coal generation at Moneypoint in June 2025. ESB's complete exit from coal marks a significant milestone
- ~1,400 MW of operational renewables, including full commercial operation of Neart Na Gaoithe offshore wind farm and addition of Lettermuckoo, a 101 MW onshore windfarm in Galway
- 310 MW of operational utility-scale battery storage
- Continued successful delivery of deep retrofits by Electric Ireland Superhomes, delivering 526 deep retrofits in 2025
- Continued development of hydrogen-ready infrastructure and partnerships.

Moody's assessment confirmed that ESB's targets cover all attributable emissions, including fuel and energy-related activities and use of products sold, categories that dominate Scope 3 emissions.

Climate Governance

Climate governance is embedded across ESB's Board and executive structures. The Safety, Sustainability and Culture Committee provides oversight, with integration into the Enterprise Risk Management (ERM) framework.

Read more about our sustainability governance structure at ESB on pages 13–14

Climate risk and opportunity is integrated into the strategic review process in ESB. Climate risk is also linked to the ERM process through two principal risks related to climate for 2025. The Audit and Risk Committee oversees the overall ERM process for ESB Group. This committee reviews risks throughout the year as well as having dedicated session on risk, including climate risk.

Moody's assessed ESB's governance and was scored at the highest Moody's tier for governance (Tier 1), which includes metrics around targets and transparency.

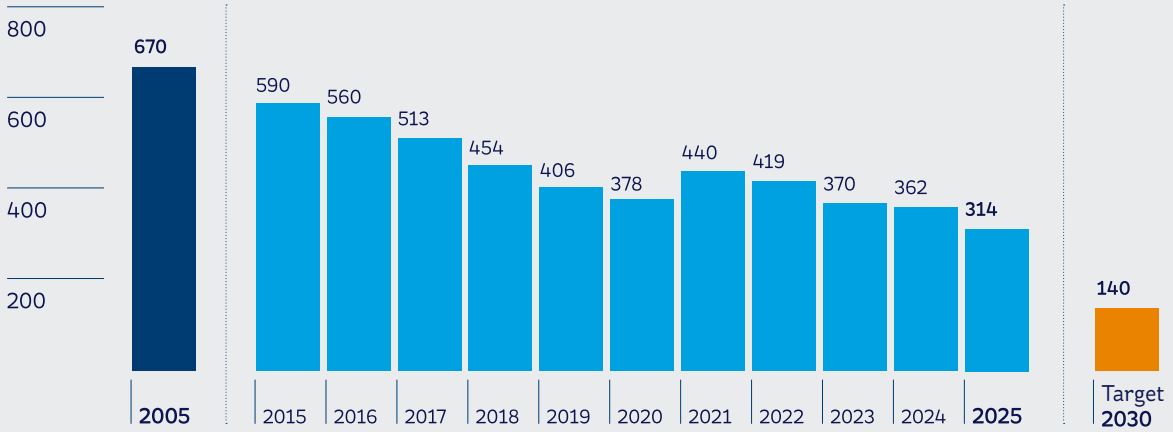
Read more about our Moody's report

Reporting

As well as reporting against key Net Zero Pathway Strategic Performance Indicators in the ESB Annual Report, we also make voluntary disclosures under EU Taxonomy Regulation.

Read more about EU Taxonomy on page 53

ESB's generation carbon intensity for reporting year (tCO_2e/GWh)



This reflects our focus on renewable generation, battery storage, and low-carbon network development and our commitment to the low-carbon transition, as evidenced by the scale of investment in taxonomy-aligned activities in line with our Net Zero 2040 Strategy.

Definition

Locked-in emissions: future greenhouse gas emissions that become practically unavoidable due to decisions made today, especially decisions involving long-lived infrastructure assets or technologies.

Once these systems are built or purchased, their associated emissions are effectively committed for their entire operational lifetime.

Locked-in emissions and mitigation

We recognise the challenge of locked-in emissions from existing infrastructure, particularly thermal generation and gas sales. ESB operates 10 thermal stations across Ireland, Northern Ireland, and Great Britain, which are the primary source of our direct GHG emissions.

To mitigate these emissions, we're:

- Avoiding long-term commitments to new fossil fuel generation
- Avoiding lock-in to fossil fuel by making sure any new thermal generation needed by the market can transition to a low-carbon fuel
- Developing and acquiring renewable assets.

E1 Climate change continued

Targets

E1-4

To stay on track towards our net zero by 2040 goal, we've set clear and measurable targets across key areas of our business. These targets are grouped under mitigation, energy and adaptation, helping us focus our efforts where they matter most. They guide our progress, hold us accountable and ensure we're delivering real results for customers, communities, and the climate. Our targets link to the IROs we identified through our DMA – see more detail on this on pages 20–21.

Mitigation and energy targets

Our GHG Emission Reduction Targets

To meet our commitment to be net zero by 2040, we've established a set of internally focused SPIs to measure and monitor our progress towards 2030. We disclose performance against these targets annually in our Annual Report and Financial Statements.

We've set specific greenhouse gas emission reduction targets, disclosed in both absolute and intensity values. These targets are aimed at managing material climate-related impacts, risks, and opportunities. ESB has set a core emission reduction target of 44% across all scopes (Scope 1, 2, and 3) by 2030, compared to 2022 levels. Since 2023, we've included GHG forecasting in our five-year Integrated Business Plan process.

ESB is making significant strides towards its 2030 sustainability goals, with a strong focus on decarbonisation and electrification. Since 2022, the company has expanded its renewable generation and renewable enabling portfolio from over 1.3 GW to c.2 GW, aiming to reach 5 GW by 2030. Through our networks, we've enabled 7.9 GW of zero-carbon electricity in Ireland, progressing toward a 2030 target of 22 GW (2.6 GW in NI). The share of ESB's generation output from zero-carbon sources has grown from 15% to 24.8%, with a goal of 63% by 2030. Smart meter installations have surged to almost 2.1 million, moving toward the 2.6 million target by 2030. In transport, ESB is scaling up public EV infrastructure, increasing the number of chargers from a baseline of round 800 in 2022 to c.1,026 in 2025, with a target of 3,000 by 2030. Additionally, the carbon intensity of ESB's generation has dropped from 419g CO_2/kWh to 314g CO_2/kWh, with a target to reduce carbon intensity to 140g CO_2/kWh by 2030, underscoring its commitment to a low-carbon future.

TARGETS

Emission reduction targets performance

Number	Key Target Name	2022 Baseline Year	2025 Progress	2030 Target[1]
T 1	**ESB renewable and renewable enabling generation portfolio (installed capacity)**	1.3 GW	2 GW	5 GW
T 2	**Scale of zero-carbon electricity enabled by our networks**	5.4 GW in ROI 1.8 GW in NI	7.9 GW in ROI 1.9 GW in NI	22 GW in ROI 2.6 GW in NI
T 3	**Share of ESB generation output from zero-carbon sources**	15%	24.8%	63%
T 4	**Number of smart meters installed**	1.1 Million	2.1 Million	2.6 Million
T 5	**Electrification of transport network: public EV chargers**	800 (island of Ireland and GB)	c.1,026 (island of Ireland and GB)	3,000 (total)
T 6	**Carbon intensity of ESB's generation assets and activities**	419g CO_2/kWh	314g CO_2/kWh	140g CO_2/kWh

1 Strategic targets in this report are those in place at 31 Dec 2025. These were under review at time of preparing this report, so are subject to change.

E1 Climate change continued

Targets continued

Adaptation targets

The management of physical risk and the subsequent climate adaptation actions is an important aspect of risk management for ESB. Climate risk assessments have been undertaken to highlight the key risks to ESB assets. The next phase of this work will involve the development of climate adaptation strategies, where relevant for the assets. Climate adaptation strategies will include targets, action plans and performance monitoring and reporting to ensure that physical risks are being managed.

Work has progressed on the development of climate adaptation plans and targets through the development of ESB Networks' business plan for PR6. In this plan, ESB Networks has committed to evolve their climate adaptability framework to ensure that the risks and impacts of climate change on the network are evaluated and addressed. The work to evolve this climate adaptability framework has also been informed by ESB Networks' inputs to the Department of Climate, Energy and the Environment's 2025 Sectoral Adaptation Plan released in November 2025 and further by the Storm Éowyn Review in response to the unprecedented impact of Storm in response to the unprecedented impact of Storm Éowyn in January 2025. This review identified a wide range of recommended actions aimed at further strengthening long-term storm resilience and enhancing preparedness across the business.

The published findings and recommendations of the Storm Éowyn Review complement the 2025 Sectoral Adaptation Plan. In April 2025, NIE Networks initiated a strategic programme to review severe weather resilience, taking a technology-led approach to strengthening network resilience and improving emergency response.

European Distribution System Operators (DSOs) have published a position paper on climate resilience metrics for electricity grids, which provides a level of guidance for network resilience metrics. Resilience metrics provide a link between the resilience of the network to a disruptive event, the programmes which improve that resilience, and how the impact of a disruptive event to the customer is reduced. ESB has contributed to the development of a position paper by Eurelectric on 'Strengthening climate resilience – Strategies for enhancing DSO resilience against climate change', with a case study on flood risk mitigation in ESB Networks' HV substations.

Work programmes on climate adaptability and network resilience will continue to evolve in 2026. ESB Networks has ambitions to develop specific resilience metrics and targets over the coming regulatory price review period. It is anticipated that these metrics would align with and be complementary to existing reporting obligations on network performance.

Flood risk targets

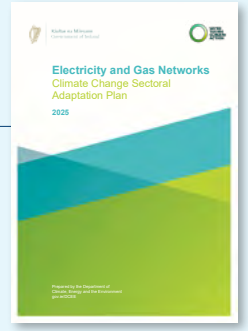
As noted in the table of physical risks on page 30, flooding has the potential to impact ESB's assets.

To manage the potential impact of higher frequency of hundred-year-plus flood events on rivers and dams, each hydro generation scheme (Shannon, Erne, Liffey and Lee schemes) has a comprehensive regimen for inspection and supervision of the dams. Each scheme has a Dam Safety Organisation Structure with assigned roles and responsibilities for competent internal personnel. The documentation for each hydro generation scheme outlines specific targets for each dam structure, but in general these are:

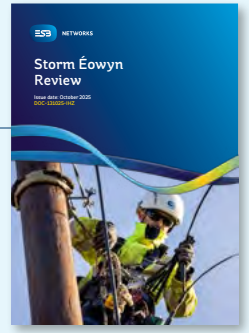
- Annual inspection and report
- Annual review by External Dam Safety Committee (EDSC)
- 5-year inspection by EDSC and report issued (for Category A dams), which is reviewed by the SSC Committee and the ESB Board.

Learn more

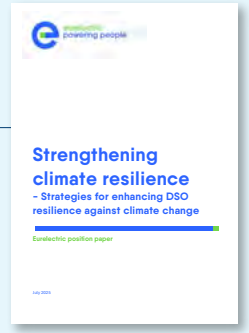
Sectoral Adaptation Plan



Storm Éowyn Report



Strengthening climate resilience – Strategies for enhancing DSO resilience against climate change



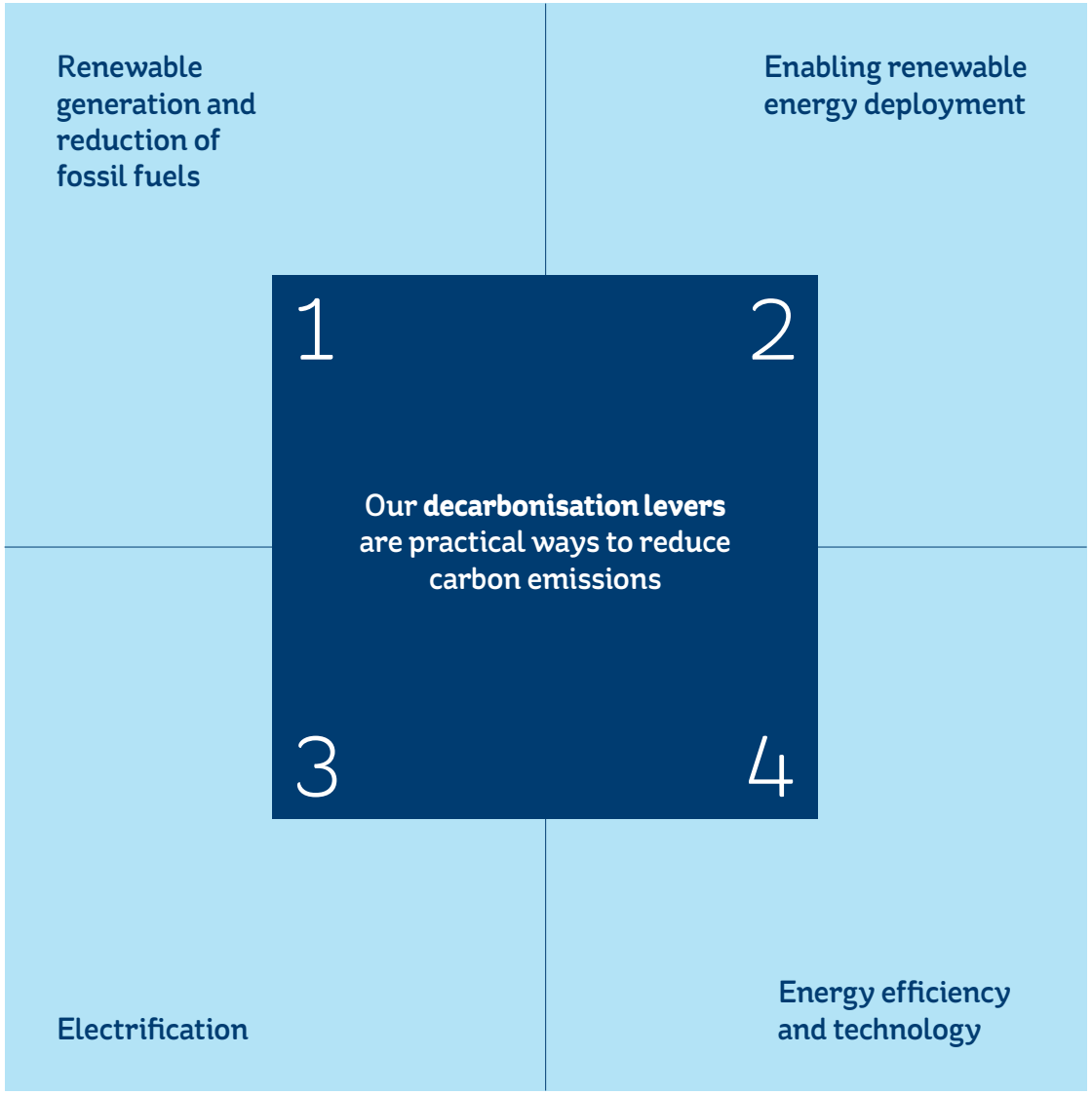
E1 Climate change continued

Actions

E1-3

We are accelerating Ireland's clean energy future by committing to reach net zero by 2040, a full decade ahead of the national 2050 goal. Our actions in this section are grouped into three key areas: mitigation, energy, and adaptation. This helps us focus on cutting carbon emissions, building a cleaner and smarter energy system, and preparing for the impacts of climate change.

Many of these actions are grouped by 'decarbonisation levers', which are practical ways to reduce carbon emissions.



DL 1 DL 2 DL 3 DL 4

Read more about our **decarbonisation levers** wherever you see these icons

By using these levers, we're making sure our efforts are effective, measurable and aligned with our climate goals. We've mapped key actions within our business to multiple IROs, acknowledging that some actions contribute to the management of more than one IRO.

We aim to reduce reliance on fossil fuels and accelerate efforts to decarbonise electricity, for example by increasing renewable generation to 5 GW by 2030. In 2025, we took a critical step forward in phasing out fossil fuels as we stopped using coal as a generation fuel source at ESB's only coal-based power station, Moneypoint, in Killimer, Ireland. We've transitioned the units to run on heavy fuel oil, a less carbon-intensive fuel – and this will only operate when called upon as a back-up if there's a shortage in supply on the Irish grid. See case study on page 38. Currently, we have almost 1,200 MW of operational onshore and offshore wind, over 200 MW of hydro generation and over 310 MW of battery storage. The following action tables show some of the actions we're taking to reach our 2030 target and address material IROs, including actions that will be taken in the future.

E1 Climate change continued

Actions continued

CASE STUDY

ESB's offshore wind leadership

IROs
See page 28
17

Decarbonisation Levers:
See page 37
DL 1

The context
Renewable energy is a cornerstone of ESB's Net Zero 2040 Strategy. Offshore wind energy plays a key role in reinforcing Ireland's energy security and positioning ESB as a leader in the transition to a low-carbon future. ESB's offshore portfolio is central to Ireland's target of 5 GW of renewable energy generation by 2030, and the goal of 20 GW offshore wind by 2040.

What we did
In 2025, ESB, in partnership with Ørsted, secured a landmark win in Ireland's second Offshore Renewable Electricity Support Scheme (ORESS) auction. The Tonn Nua project, located off the Waterford coast, achieved a competitive strike price of €98.72/MWh under a 20-year Contract for Difference (CfD).

The impact we're creating
This 900 MW fixed-bottom offshore wind farm will generate enough clean energy to power up to one million homes, cutting 1.8 million tonnes of CO_2 annually and delivering a circa €6 million per annum Community Benefit Fund over 20 years.

What we're doing next
ESB's commitment to offshore wind extends far beyond a single project. The company is building a diverse pipeline across Ireland and the UK, ensuring scale, resilience, and innovation:

- **Oriel Offshore Wind Farm** (Ireland): ESB is co-developing the 375 MW Oriel Wind Park in the Irish Sea, one of Ireland's first commercial offshore wind projects
- **Green Atlantic @ Moneypoint**: ESB's flagship decarbonisation project at Moneypoint includes plans for offshore wind integration alongside renewable hydrogen production
- **Inch Cape Offshore Wind Farm** (Scotland): A 50:50 joint venture with Red Rock Power, this 1.1 GW project achieved financial close in early 2025, backed by £3.5 billion in financing
- **Gwynt Glas Floating Offshore Wind** (UK): ESB and EDF secured a site in the Crown Estate's Round 5 leasing auction for a 1,500 MW floating offshore wind project
- **Operational Assets**: ESB already has stakes in major UK offshore wind farms, including Galloper (353 MW) and Neart na Gaoithe (448 MW).

900 MW

This 900 MW fixed-bottom offshore wind farm will generate enough clean energy to power up to one million homes

1.8M tonnes of CO_2

This will cut 1.8 million tonnes of CO_2 annually and deliver a €6 million Community Benefit Fund over 20 years

E1 Climate change continued

Actions continued

DL 1 **Renewable generation and reduction of fossil fuels**

Accelerating the shift away from fossil fuels by prioritising the development and deployment of renewable energy sources. This includes significant investments in increasing wind and solar capacity, with the goal of reaching 5 GW of renewable and renewable-enabling technologies by 2030. The approach involves phasing out high-carbon fuels in favour of less carbon-intensive alternatives used only for back-up, thereby making electricity generation cleaner and more resilient. By embracing these measures, the strategy aims to substantially cut carbon emissions, support long-term energy security, and ensure progress towards our net zero ambition by 2040.

IROs		Link to targets	Key actions taken
15	**Risk relating to availability of capital and expertise** We rely on partners to develop products and services which are critical to business operations. There's risk that without these partners, we may not be able to develop renewable energy, e.g. for the operation of wind farms	T 1 T 3 T 6	We're expanding our renewables capacity through strategic partnerships in wind and solar energy. Key collaborations include Coriolis and Coillte (onshore wind), Ørsted (offshore wind), and Harmony and Bord na Móna (solar). Notable projects for 2025 include: **Offshore Wind** • In partnership with Ørsted, ESB secured a landmark win in Ireland's second Offshore Renewable Electricity Support Scheme (ORESS) auction. The resulting Tonn Nua project will deliver 900 MW of clean renewable energy • ESB completed the construction of Neart na Gaoithe Offshore windfarm in 2025 (having purchased a 50% stake in the project in 2019) with a total capacity of 448 MW • Inch Cape, a 1,080 MW offshore wind farm development project of which ESB hold 50% ownership, achieved financial close in early 2025. Construction is progressing in line with expectations and commercial operations are expected in 2027 • ESB secured a seabed lease for a floating offshore wind development (1,500 MW total) in the Celtic Sea. Gwynt Glas is a joint venture development with EDF. **Onshore Wind** • ESB completed the acquisition of the onshore windfarm Lettermuckoo in County Galway, adding just over 100 MW to the renewable generation portfolio • FuturEnergy Ireland, a joint venture between ESB and Coillte to develop up to 1,000 MW of onshore wind farms on Coillte lands in Ireland, achieved Final Investment Decision on Drumnahough, a 58 MW wind farm to be developed in Co. Donegal in partnership with SSE.
14	**Risks associated with the delivery of a renewable pipeline, including project quality management** Failing to deliver the scale and manage the project quality of renewable generation assets needed to meet market and societal needs and achieve strategic objectives		
12	**Financial risk associated with adaptation and mitigation measures** Investment risk due to the large capital outlay associated with investment in growth of the electricity sector and adaptation measures for physical assets and technology		
17	**Positive impact on long-term energy security** Generating renewable energy and developing gas and other assets to support security during the energy transition, helping to increase Ireland's national energy security		
18	**Negative impact from energy usage and GHG emissions** Missions are associated with own operations, and the upstream and downstream value chain		

E1 Climate change continued

Actions continued

DL 1 **Renewable generation and reduction of fossil fuels**

IROs	Link to targets	Key actions taken
15 14 12 17 18 Continued from previous page	T 1 T 3 T 6	**Solar** • ESB energised its first wholly owned solar farm, Bullstown in County Meath (June 2025), which added an additional 8 MW to the renewable generation portfolio, powering 2,000 homes • Construction progressed on seven wholly owned solar projects during 2025, totalling c.422 MW of capacity, which were previously successful in RESS auctions. **Thermal** • Cessation of coal operations in Moneypoint was achieved in June 2025 (see case study) • Sale of Corby power station in August 2025. Corby was a 350 MW CCGT operating in the UK, in full ESB ownership since 2011 • The Board of ESB approved capital expenditure for the Dublin Bay Power overhaul in 2026. In addition to likely extending the life of the plant to 2040, the scope of work will also increase the maximum plant output from 415 MW to 445 MW, increase thermal efficiency by a minimum of 1.5% (which will reduce CO_2/MWh by 5%) and will facilitate up to 40% hydrogen blend to be burned (if/when available) • Construction continues on the 299 MW OCGT unit at Poolbeg, which will provide essential capacity to the market in times of peak demand.

For future us

The cumulative impact of these actions means that ESB Generation Trading reduced the carbon intensity of electricity, with CO_2 output falling by 68% to 4.7 M tCO_2 in 2025 and carbon intensity down 53% to 314 g CO_2/kWh compared to 2005, when EU ETS reporting commenced.

68%
reduction in CO_2 output

53%
reduction in carbon intensity

E1 Climate change continued

Actions continued

DL 2 Enabling renewable energy deployment

Enabling renewable energy deployment focuses on accelerating the development, connection, and integration of renewable energy sources across Ireland. These efforts are pivotal in reducing carbon intensity, increasing renewable generation capacity, and supporting Ireland's transition to a low-carbon energy system by 2050. ESB aims to enable over 24 GW of zero-carbon electricity through our networks across the island of Ireland by 2030.

IROs		Link to targets	Key actions taken
13	**Climate transition risk** – there is a risk if ESB fail to meet their sustainability targets communicated in ESB's Net Zero by 2040 Strategy or to inform or respond to climate change policies and/or capture opportunities and manage challenges presented by those policies. This could result in reduced performance along with growing public, customer and investor concerns	T 2	ESB is accelerating network connections under the Renewable Energy Directive to enable faster deployment of renewable projects during PR6 period 2026–2030. This includes plans for 4.4 GW of large grid-scale connections, 2.5 GW of micro-scale connections, and 255 new renewable connections, hubs, and reinforcement projects, subject to budget, necessary approvals and constraints. ESB Networks is playing a role in Ireland's National Energy Demand Strategy (NEDS), which aims to achieve 20% to 30% flexibility in energy demand by 2030. This calls on us to enable around 11% of this flexibility. This supports security of supply as customers can adjust their energy use, storage and local generation dynamically. We'll take on a more active role in managing energy flows to meet the requirements set out in the Clean Energy for All Europeans Package, the Climate Action Plan, and the National Energy Demand Strategy.
16	**Security of supply risk** – risk of capacity shortfall in electricity generation and/or fuel supply issues, such as insufficient generation capacity to meet peak demand, could lead to a negative impact on ESB's reputation and potential demand management measures		In 2025, ESB Networks and NIE Networks invested a total of €1.7 billion in network infrastructure across the island of Ireland. This investment aimed to upgrade and expand capacity, connect customers and renewable generation, and support the widespread adoption of electric transport and heating.
19	**Risks associated with energy market and supply chain disruption** – there is a risk of volatility in energy markets and other elements of global supply chains resulting in effects on financial performance and ability to deliver strategic objectives		ESB Networks connected 573 MW of new utility scale renewable generation and 83 MW energy storage to the network in 2025. This brought renewable generation on the system to 7.9 GW, including over 5 GW of onshore wind and 2.4 GW of solar. NIE Networks connected 128 MW of grid scale renewables in 2025 bringing the system total to 1.9 GW.
			ESB Networks connected over 47,000 (230 MW) microgeneration customers during the year. NIE Networks connected 138 MW of microgeneration customers in 2025.

E1 Climate change continued

Actions continued

CASE STUDY

Ending coal at ESB – a milestone for future us

IROs
See pages 27 and 28 10 16

Decarbonisation Levers:
See page 37 DL 1 DL 2

The context
Coal has historically been a cornerstone of Ireland's energy security, with Moneypoint providing up to 915 MW of generation capacity since the 1980s. Its retirement six months ahead of schedule demonstrates our commitment to climate action and supports UN SDG 13: Climate Action. Ireland and ESB now joins the ranks of European nations and electricity utilities that have eliminated coal from their electricity systems.

What we did
In June 2025, ESB officially ended all coal use in its portfolio with the cessation of coal burning at Moneypoint Power Station, marking one of the most significant steps in Ireland's energy transition. For the next few years, it will run exclusively on oil – a less carbon-intensive fuel – and will only operate when called upon as a back-up should there be a shortage in supply on the Irish grid. This transition represents a decisive move towards a low-carbon future and aligns with ESB's Net Zero 2040 Strategy.

The impact we're creating
This milestone exemplifies double materiality: reducing environmental impact while safeguarding energy security and supporting economic resilience. It demonstrates ESB's leadership in delivering systemic change and aligns with ESRS E1 (Climate Change) and ESRS S3 (Affected Communities).

Ending coal generation significantly cuts emissions from ESB's portfolio as well as reducing the carbon intensity of energy generation, while investments in grid technologies support Ireland's renewable targets. ESB continues to engage with employees and communities throughout all this to ensure a fair and inclusive transition.

What we're doing next
The end of coal is not the end of Moneypoint. The site is evolving into a renewable energy hub under the Green Atlantic @ Moneypoint initiative, a multi-billion-euro programme launched in 2021.

Key developments to date include the commissioning of Ireland's first synchronous compensator at Moneypoint, which supports increased renewable energy on the grid by enhancing stability, and a 17 MW onsite wind farm, signalling the shift to clean generation.

In addition, work is ongoing to realise the Green Atlantic Vision, with a series of interconnected projects that reshape Moneypoint into a strategic clean-energy hub. These include:

- Repowering for Lower-Carbon Dispatchable Generation: Investigating open-cycle gas turbine technology operating on low/zero-carbon fuels (e.g. HVO)

- Clean Energy Storage: Exploring long-duration energy storage opportunities
- Offshore Wind Port: Port facilities for fixed and floating offshore wind construction and deployment
- Zero-Carbon Fuels & Innovation: Pilot and large-scale projects to test and deploy hydrogen-derived fuels, including green ammonia, for electricity generation
- Coal Yard conversion: We plan to repurpose the existing coal yard for future power generation developments. Existing large-scale coal handling infrastructure will be removed from the site on a phased basis
- Ash circular economy project: Sustainable reuse of legacy materials, including pulverised fly ash (PFA), furnace bottom ash (FBA) and flue gas desulphurisation (FGD) by-products. These by-products have the potential for re-use, which is a significant benefit to the circular economy.

E1 Climate change continued

Actions continued

DL 3 **Electrification**

Accelerating the transition to a low-carbon energy system by supporting the adoption of electrified solutions and enhancing network infrastructure across Ireland. The aim is to reduce greenhouse gas emissions, improve the security and flexibility of energy supply, and enable customers to play an active role in managing their energy use.

IROs	Link to targets	Key actions taken
11 **Opportunity to generate a commercial advantage** – advantages created through the increasing electrification of energy	T 5	Customer Solutions continues to expand and upgrade its public EV charging network and can now support up to 1,400 EVs charging at any one time on the Island of Ireland and up to 450 on its GB network.
		In 2025, Electric Ireland offered a suite of Net Zero products to various customer groupings to engage, empower and accelerate their transition to electricity as a primary energy source and facilitate the consumptions of self-generated renewables. **Residential customer** • Offered free battery with domestic solar installations for a limited period. This campaign delivered total battery capacity installed of over 3.5 MWh • Electric Ireland partnered with the Department of Climate, Energy & Environment and Sustainable Energy Authority of Ireland (SEAI), to deliver fully funded solar PV to eligible customers on the Priority Services Register (life support category). This delivered over 400 solar PV installs for medically vulnerable customers in 2025 • Electric Ireland entered the EV home charger installation market in April 2025 to complement the range of innovative Time of Use electricity tariffs, such as Home Electric+ Night Boost • Electric Ireland launched a heat pump customer proposition in 2025 in collaboration with Electric Ireland Superhomes. The product is designed to engage customers that live in suitable heat-pump-ready homes and deliver a simple solution for switching from fossil fuel boilers to heat pumps. **Business and SME customer** • Introduction of a behind-the-meter solar generation solution for SMEs and customers in the agriculture sector. To date, 640 kWp of this offering has been provided to these customers, with 389 kWp now operational and delivering renewable energy and savings to customers, and the remainder ready to be granted export approval • Following a strategic review and the success of its solar solution, Electric Ireland began working to establish an EV charging product for its business customers to improve the sustainability of their fleet and employee commuting. By the end of 2025, this product was well advanced with delivery partners being put in place to provide chargers and managed services to workplace and destination sites from 2026 onwards.

E1 Climate change continued

Actions continued

DL 3 **Electrification**

IROs	Link to targets	Key actions taken
Continued from previous page	T 5	**Large energy users/industrial & commercial** • Delivery of several major solar PV projects for our customers, including a ground mount system for Silver Hill Foods 0.8MWp, the energisation of a 7.3 MWp ground mount installation for MSD Brinny in Co. Cork, and a roof mount solar PV installation for KCS. We also commenced construction on an 8 MWp solar PV project for Tirlán. Collectively, these projects support industrial customers in reducing emissions through onsite renewable generation • Progressed detailed design and development work across a range of industrial and commercial decarbonisation of heat projects. Many of these are scheduled to move into construction in 2026, providing customers with investment-ready, energy-efficient solutions that contribute to long-term emissions reduction • Completed detailed design for two large solar PV carport projects (1.3 MWp and 1.4 MWp) for a major industrial client. These projects will support future onsite renewable generation capacity • Successfully completed an EV charging trial for a large industrial customer resulting in the award to rollout 28 additional chargers at their site for delivery in 2026.

E1 Climate change continued

Actions continued

DL 4 **Energy efficiency and technology**

Accelerating ESB and customer decarbonisation through use of energy-efficient and innovative technologies, and empowering businesses and households to reduce emissions and transition to sustainable energy.

IROs	Link to targets	Key actions taken
8 **Positive impact through role in national climate transition plan** – positive impact through role in the delivery of Ireland's national climate transition plan by providing renewable electricity and network infrastructures to support renewable connection 9 **Positive impact on climate change mitigation** – positive impacts created through reduction in usage of fossil fuels in own operations	T 4	ESB Networks connected over 43,000 new customers during the year, with almost 95% of applications now made through the ESB Networks digital customer portal. NIE Networks provided over 8,000 new customer connections. ESB Networks continued smart meter deployment in 2025, installing approximately 190,000 units and bringing the total to almost 2.1 million. 26% of Electric Ireland customers now benefit from smart tariffs. Customers are sent communications about Time of Use which discusses the benefits of the smart meter. In addition, customers are incentivised to adopt smart tariffs with a 30% discount running throughout the year. Additional campaigns highlighting the "smart-first" message have resulted in 38% of our Smart Tariff customers now choosing a Time of Use Tariff, which leads to more efficient electricity use and helps manage system demand. Customers are further supported in their experience of smart tariffs through: • The launch of a redesigned mobile app and customer portal experience, shaped by extensive customer research to present insights more intuitively while keeping accessibility in focus with clear summaries, suggestions, and tips that guide customers on reasons for high electricity consumption and ways to reduce it • Energy insights emails to customers on a smart meter tariff, helping them to quickly interpret their usage across appliances and projected bills. Electric Ireland also advanced the development of EV charging infrastructure across several ESB Networks locations, beginning with Finglas and Leopardstown, with construction scheduled to commence in 2026. As well as investing in physical electricity network infrastructure, ESB Networks continued to work with stakeholders to advance a range of initiatives to deliver greater flexibility and demand response, including the development of smart services, demand flexibility and new connection pathways. This is in line with national policy objectives and the CRU's National Energy Demand Strategy. The first flexible generation connection also went live during 2025, and a minimum viable product for ESB Networks' first flexible demand connection was approved by the CRU.

E1 Climate change continued

Actions continued

DL 4 Energy efficiency and technology

IROs	Link to targets	Key actions taken
Continued from previous page	T 4	ESB Networks continued to leverage digital and data to enhance services and improve customer satisfaction. Over 250,000 customers have signed up to ESB Networks' Online Account allowing them to self-serve across a wide range of services and to access energy usage data and outage information. New digital notifications for planned outages and real-time SMS updates were also introduced, and a new field services platform went live in 2025 to improve scheduling, enhance customer communications and empower network technicians with real-time mobile tools.
		ESB is committed to increasing thermal plant efficiency where possible. Dublin Bay Power will undergo a major overhaul and life extension in 2026, which will increase thermal efficiency by a minimum of 1.5% (which will reduce CO_2/MWh by 5%) (see full text in Decarbonisation Lever 1).
	T 4	ESB Networks and NIE Networks are working towards significant decarbonisation of their fleets by 2040. ESB Networks, with over 2,000 vehicles, aims to fully electrify all two-wheel-drive vehicles by 2035.
		ESB Networks and NIE Networks will also replace internal combustion engine forklifts with electric or low-carbon alternatives by 2030 and 2034 for the respective businesses.
		Over the course of PR6 and RP7, investments will be made in smart grid technology upgrades including substantial investment in operational systems, control infrastructure and digital capabilities essential for creating a more intelligent, efficient, flexible and responsive distribution network. These investments will also facilitate the integration of distributed energy resources such as wind, solar and batteries.

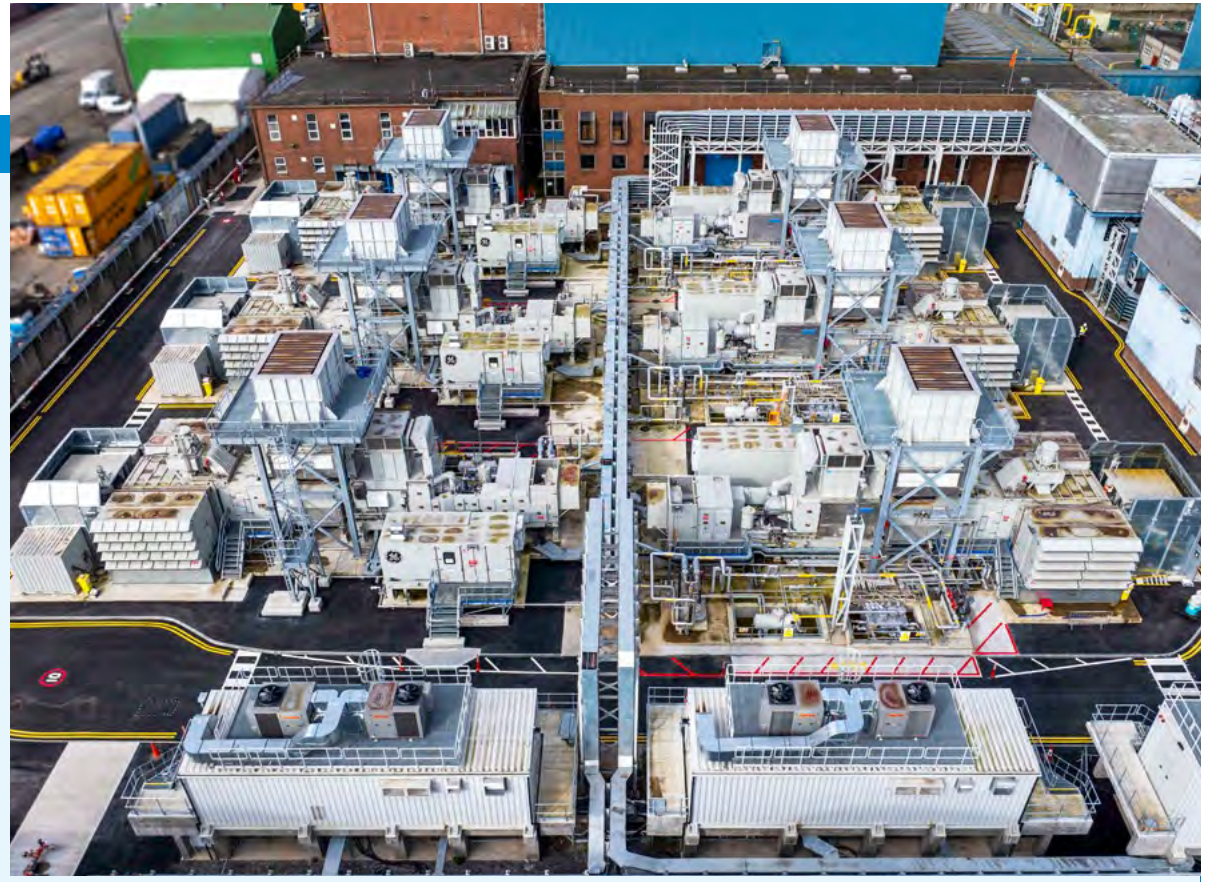
E1 Climate change continued

Actions continued

CASE STUDY

North Wall and Shannonbridge temporary emergency generation

IROs
See page 28
16
Decarbonisation Levers:
See page 37
DL 2



The context

Ireland's electricity demand is growing rapidly, surpassing 6,000 MW for the first time in January 2025. In anticipation of this increasing demand, a number of actions were identified in 2021 to address security of Ireland's electricity supply. This work was done in cooperation with the Commission for Regulation of Utilities (CRU), the Transmission System Operator (EirGrid), and the Department of Environment, Communications and Climate (DECC, now DCEE). Among the actions identified was the installation of new Temporary Emergency Generation (TEG), to be delivered within an accelerated timeline to bridge the gap to new enduring generation capacity.

What we did

ESB Generation Trading made two sites available for the installation of a total of 450 MW of flexible, fast-starting dispatchable generation; 200 MW of gas-fired generation at North Wall, Dublin, and 262 MW at Shannonbridge, Co. Offaly.

ESB worked with partners GE Vernova to safely install the plant at both sites. In both cases, an accelerated programme of works, strongly supported by DCEE, CRU, EirGrid, Environmental Protection Agency (EPA), Gas Networks Ireland, and ESB Networks, across a range of activities from consenting and licensing through to construction, enabled the capacity to be available ahead of winter 2023 (North Wall) and winter 2024 (Shannonbridge).

The impact we're creating

The rapid construction and commissioning of the North Wall and Shannonbridge TEG has provided an additional 450 MW of capacity to provide resilience to the system during the late 2020s. The TEG plants are available to generate 24/7 and can achieve full output in less than 15 minutes, providing EirGrid, the system operator, with fast-response generation options on days where there is a shortage of generation on the system. The high availability of the TEG plant has improved the resilience of the Irish electricity system with no demand amber alerts on the system since its installation. North Wall TEG has also provided resilience to the Dublin network in 2025, when it was called to operate to strengthen the Dublin network during a transmission cable outage.

What we're doing next

The TEG plants are temporary in nature. ESB GT will continue to ensure that the plant maintains high availability along with high safety and environmental standards for the duration of the plant. ESB GT is currently constructing a new 299 MW gas generator in Poolbeg, which when commissioned in 2027 will form part of the long-term system resilience, enabling the TEG plant to be decommissioned, having fulfilled their temporary but important role.

E1 Climate change continued

Actions continued

Adaptation actions

Climate change adaptation is an evolving area. We've taken pragmatic steps by conducting physical risk assessments to understand the extent of the risk. Over the coming years, ESB will take the output of these risk assessments and use them to inform areas of development for future adaptation-related plans, actions and targets. Our focus remains on improving the electricity network's reliability and resilience in the face of increasing demand and the impacts of climate change, to the greatest extent possible.

There are a number of existing measures already in place or planned to manage the physical risks of climate change and take advantage of opportunities within the businesses.

IROs	Key actions taken	Future actions
5 **Risk of climate change and/or major environmental incidents** – increasingly extreme and unpredictable weather patterns, and/or major environmental incidents (e.g. flooding, oil spill), resulting in supply chain disruption and impacting performance of assets and societal energy security	In 2025, ESB Networks created a new business area that has dedicated responsibility for network reliability and resilience. During 2025, ESB Networks has further developed their Climate Adaptability Framework to ensure that the risks and impacts of climate change on the network are evaluated and addressed. ESB Networks' approach will be aligned with EU and national policies and legislation. The framework will also ensure effective governance of climate risk and develop climate resilience metrics linking climate risk mitigation initiatives. In addition, ESB Networks provided input into the Department of Climate, Energy and the Environment's 2025 Sectoral Adaptation Plan released in November 2025.	The networks businesses will continue their programmes of work on climate adaptation with ESB Networks continuing to evolve their climate adaptability framework and NIE Networks continuing with their strategic programme for network and severe weather resilience.
1 **Negative impact through damage to local environment** – damage caused by location and operation of power generation facilities and networks during flooding and other climate events	During 2025, NIE Networks initiated a strategic programme to review severe weather resilience, taking a technology-led approach to strengthening network resilience and improving emergency response. ESB Networks and NIE Networks submitted work plans to their respective regulators to undertake works to improve network resilience and climate adaptability. In Northern Ireland the Utility Regulator made a Final Determination for RP7 in Dec 2024 to cover investment in the network for the period 2025–2031, and in Ireland the CRU made a Final Determination for PR6 in Dec 2025 for the period 2026–2030. These investments will deliver a significant expansion of and upgrades to infrastructure with enhanced extreme weather resilience and smart technologies for system operation to improve security of supply and increase network resilience.	These programmes will identify the requirements for the networks to adapt to changes in the climate and cater for the present and future needs of its customers while meeting our wider obligations.
2 **Opportunity for financial savings through investment in climate adaption technology** – opportunity to invest in emerging technologies with the potential to establish a 'future-proof' business model that is resilient to the threats posed by climate change		Network automation: We plan to deploy a range of smart devices on the overhead line network to automate processes, pinpoint fault locations, and enable fault responses to be activated or controlled centrally. These technologies will enable 'self-healing' of transient faults, better communications with central operations on fault locations, and faster restoration times to reduce outage durations.
3 **Financial risk associated with adaptation and mitigation measures** – investment risk due to the large capital outlay associated with investment in growth of the electricity sector and adaptation measures for physical assets and technology	A number of actions were undertaken as a result of Storm Éowyn, see case study on Storm Éowyn response on page 50, which was developed in the immediate aftermath of the storm. In addition, a review was carried out on ESB Networks PR6 submission to ascertain if sufficient investment was proposed in the area of network resilience. Finally, a formal review into Storm Éowyn was carried out, which noted a number of recommended actions for both ESB Networks and the National Emergency Coordination Group.	
	In addition, following a successful mutual aid arrangement between ESB Networks, NIE Networks and other European DSOs, ESB is leading a working group under E.DSO (European Distribution System Operators) comprising of 12 utilities from across the 37 member DSOs who are working together to formalise mutual aid arrangements with European utilities.	

Continued on next page

E1 Climate change continued

Actions continued

IROs	Key actions taken	Future actions
4 **Operational risk** – risk to developing and deploying renewable infrastructure caused by legislative delays 6 **Risk of downturn in economic conditions and public finance support** – a downturn in the Irish and UK economy may adversely impact climate adaptation investment/transition plans. The availability of public funding/attitudes of elected government therefore serve as a dependency for ESB's transition plan 7 **Risk of non-compliance with laws, regulations, licences** – risk of failure to comply with applicable legal and governance obligations whether imposed by law, regulation or licence	Ongoing flood risk management actions taken include continued integration of flood risk assessments in the development phase of projects. ESB Networks continues to work with the OPW and their Catchment Flood Risk Assessment Management model to identify HV substations at risk of flooding and implementing mitigation measures where necessary. The hydro generation fleet have a suite of regulations and guidelines for management of the rivers, which govern their operation. A number of climate adaptation measures for overhead lines continue to be implemented, such as the use of composite wood poles, which offer increased strength and resilience under storm conditions, and trials of covered conductors to mitigate against the risk of failing timber in particular applications. These measures are being implemented, where suitable, as projects are executed. Investigations were completed on the use of composite crossarms on the network which offer increased strength and resilience to the network under storm conditions. A trial of this component is planned for the overhead network. The networks businesses continued to implement vegetation management programmes. The criticality of these programmes was further underscored by the impacts of vegetation in Storm Éowyn, and further steps were undertaken as part of the Winter Grid Resilience Planning (see case study on page 50). Significant vegetation clean-up and remedial actions were required post Storm Éowyn. Resilient infrastructure also includes the development of generation assets that meet the needs of a safe, secure energy system. In 2025, ESB transitioned Moneypoint operations to HFO, as a generator of last resort, and continues to operate the Temporary Emergency Generation assets at the request of the system operator as required.	Continued from previous page To minimise outages caused by vegetation, ESB plans to significantly enhance its vegetation management programme to reduce the impact of storms on the network. We are also encouraging contractors to increase recruitment and training to support these efforts. Both networks businesses to implement flood mitigation and protection works over the PR6 and RP7 periods. These works will be undertaken at identified substations, prioritised by risk profile. Future actions will continue to be informed by adaptation work programmes.

E1 Climate change continued

Actions continued

CASE STUDY

Storm Éowyn Response

IROs
See page 27
1 5

The context
As a result of climate change, the island of Ireland is experiencing increasingly severe extreme weather events. In January 2025, Storm Éowyn brought hurricane-force winds which had an unprecedented impact and caused extensive damage to networks. At the peak, almost one million electricity customers on the island of Ireland were without power. The long duration of the resulting power outages resulted in significant challenges for electricity customers right across the island.

Photo credit
Thanks to Jaz Burns.

What we did
In response to Storm Éowyn, ESB Networks and NIE Networks, together with many other parts of ESB Group, worked tirelessly, often in difficult circumstances, to support customers, repair damage, restore supply and to communicate to the public. They were supported by contracting partners, volunteers from across the organisation, and teams from other DSOs.

The ESB Networks National Emergency Response Group co-ordinated a cross-company response, including colleagues being redeployed to our call centres and to damage assessment roles in support of ESB Networks. The company IT teams worked to ensure PowerCheck and our public-facing websites were available. Our external communications colleagues continually engaged with the media to ensure the public stayed informed.

As a longer-term response to extreme weather events, ESB Networks is developing its Climate Adaptability Framework, in addition to implementing Enhanced Winter Grid Resilience planning, which commenced in winter 2025. NIE Networks has also initiated a strategic programme to review severe weather resilience, taking a technology-led approach to strengthening network resilience and improving emergency response.

The impact we're creating
The damage from Storm Éowyn to electricity networks caused huge disruption and inconvenience for electricity customers, particularly in rural communities. It also resulted in additional cost to ESB of approximately €95 million.

Winter Resilience Grid planning aims to enhance the resilience of the electricity grid in the most vulnerable locations for the winter periods and take immediate short-term measures to reduce the impacts of potential storms each winter. Some specific examples include:

- Completion of network surveys in the worst affected areas and identification of required works
- Addressing overhead lines that have been damaged or weakened by the storm
- Procurement of emergency timber contractors
- Working with Government to address electricity network through forestry corridors and identifying the highest-priority corridors to engage with landowners
- Expansion of emergency storm stocks.

What we're doing next
Both ESB Networks and NIE Networks are investing in long-term measures to address the impacts of climate change on electricity distribution infrastructure.

E1 Climate change continued

Metrics

We aim for our metrics to provide clear, reliable insights into our energy use, GHG emissions and exposure to climate-related impacts, risks and opportunities. This supports transparency, accountability and informed stakeholder engagement.

Across our business, we're taking comprehensive steps to identify and assess our actual and potential impacts on climate change. We use quantitative and qualitative methods to thoroughly examine our GHG emissions and energy usage. Since 2005, we've reported our Scope 1 GHG emissions in accordance with the Greenhouse Gas Protocol methodology. Reporting on additional scopes and categories has continued to progress as data has become available and are now reporting across all applicable scopes and categories.

The data to the right is for ESB Group on a consolidated basis, inclusive of NIE and So Energy as wholly owned subsidiaries.

Energy

E1-5

The below tables highlight metrics associated with ESB's energy consumption and mix, aligned with ESRS E1-5: Energy Consumption and Mix.

Energy consumption and mix (MWh)	2025[1]	2024
(1) Fuel consumption from coal and coal products	689,307	1,867,254
(2) Fuel consumption from crude oil and petroleum products	1,233,918	1,588,863
(3) Fuel consumption from natural gas	20,005,825	19,529,316
(4) Fuel consumption from other fossil sources	–	–
(5) Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources[1]	23,346	
(6) Total fossil energy consumption from fossil sources	21,952,396	22,985,433
(7) Consumption from nuclear sources	–	–
(8) Total renewable energy consumption[1,2]	3,191	
Total energy consumption	21,955,587	22,985,433

Non-renewable and renewable energy production (MWh)	2025[1]	2024
Non-renewable energy production	11,169,507	
Renewable energy production	3,675,455	

1 Reporting under ESRS methodology. Some prior year comparators are not available.
2 Premise electricity consumption from renewable generation sources, including self-generated premise solar energy.

Overview of energy consumption

Coal and Heavy Fuel Oil usage in our thermal station Moneypoint reduced in 2025 as ESB ceased coal generation and transitioned Moneypoint operations to HFO. The station will operate on HFO as a generator of last resort at the direction of EirGrid. This led to a significant reduction in ESB's total energy consumption from fossil sources in 2025. Production of renewable energy grew significantly in 2025 largely due to the entry into commercial operation of Neart Na Gaoithe offshore wind farm and acquisition of Lettermuckoo onshore wind farm.

E1 Climate change continued

Metrics continued

Overview of Scope 1, 2, & 3 emissions

Overall total emissions have reduced from 9.5m tCO_2e in 2024 (restated) to 8.4m tCO_2e in 2025. The main reduction is in Scope 1 emissions, due to the cessation of coal generation in our thermal station, Moneypoint, in June 2025. Scope 3 emissions have reduced, with the main reduction being in Category 3.

Gross Scopes 1, 2, 3 and total GHG emissions

E1-6

The below tables highlights metrics associated with ESB's Scope 1, 2 and 3 greenhouse gas (GHG) emissions, aligned with ESRS E1-6.

Gross Scopes 1, 2, 3 and Total GHG emissions (tCO_2e)[1]	2025	2024[3]
Scope 1 Emissions		
Gross Scope 1 Emissions[4]	**4,686,462**	**5,111,417**
Percentage of Scope 1 GHG emissions from the EU Emissions Trading System (EU ETS) (%)[4]	99.5%	99.4%
Scope 2 Emissions[5]		
Gross Scope 2 Emissions (Location-Based)	**376,204**	**474,974**
Gross Scope 2 Emissions (Market-Based)[6]	374,764	
Scope 3 Emissions[2]		
Gross Scope 3 Emissions	**3,307,238**	**3,931,878**
Cat 1 – Purchased Goods & Services	121,612	105,970
Cat 2 – Capital Goods	601,717	408,652
Cat 3 – Fuel & Energy	1,024,419	1,804,302
Cat 5 – Waste	1,134	9,318
Cat 6 – Business Travel	6,058	8,489
Cat 7 – Employee Commuting/WFH	7,871	4,474
Cat 11 – Use of Sold Products	1,434,179	1,549,615
Cat 15 – Investments	110,248	41,058

1 Reporting under ESRS methodology.
2 During 2025 we have enhanced our reporting of categories 1, 2, 3 and 15.
3 Scope 3 2024 comparators for categories 1, 3 and 15 have been restated to align with ESRS methodology for comparison purposes.
4 Scope 1 emissions consist of emissions from thermal generation, vehicle transport, generators, gas in buildings and fugitive emissions. Thermal generation emissions are based on verified data.
5 Scope 2 emissions include Group Network Losses on transmission and distribution assets, adjusted for emissions already accounted for in Scope 1, and premise electricity consumption. Emissions factors have been revised to improve the accuracy of the Group Network Losses methodology.
6 Scope 2 market-based emissions reflect supplier-specific emissions factors. Prior year comparator is not available.

E1 Climate change continued

Policies

E1-2

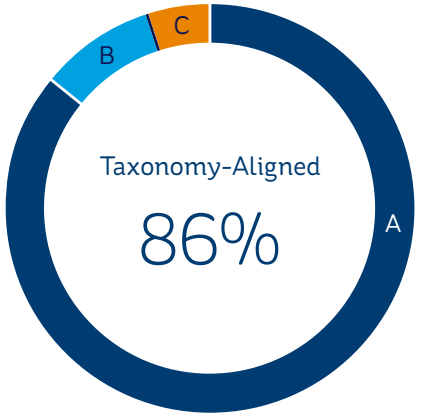
Climate change is managed under our Environmental and Sustainability Policy. We're guided by our goal to achieve net zero emissions by 2040. Our sustainability strategy sets the direction for us to support our customers and ensure continued growth and investment. This policy sets out the principles to guide our progress towards our ambition to achieve these goals.

This policy applies to everyone who works for us, including Board members, employees, contractors, casual workers, and agency workers within the ESB Group. The Head of Sustainability is accountable for implementing this policy. We've committed to conducting our activities and those of our subsidiaries in an environmentally responsible manner, complying with all relevant regulatory planning, environmental, and sustainability legislation. We review the policy periodically and update it as necessary.

EU Taxonomy

This year we have made voluntary disclosures under EU Taxonomy Regulation. This allows us to show how investments are aligned with sustainability criteria*.

CapEx



A	Taxonomy-Aligned	86%
B	Taxonomy Eligible but not Taxonomy-Aligned	9%
C	Taxonomy Non-Eligible	5%

* Investments in equity accounted investees (joint ventures) are not included but represent a growing proportion of ESB's capital investment in renewable generation.

Photo credit
Thanks to Martin Lynch.

Entity specific

Investing in modern reliable infrastructure and developing a smart and flexible electricity network

Topical disclosure structure

Why this matters

Investment in smart, resilient networks underpins Ireland's electrification and ESB's net-zero ambition

Modern, reliable and flexible electricity infrastructure is essential to delivering ESB's net zero ambition while maintaining security of supply. The electrification of transport, heating and industry is placing unprecedented demands on electricity networks, requiring significant investment and system transformation. Addressing these challenges is central to ESB's Driven to Make a Difference: Net Zero by 2040 Strategy, particularly the Resilient Infrastructure strategic objective, and to enabling Ireland's wider decarbonisation goals.

Investment in smart and flexible networks enables higher levels of renewable generation, supports customer participation in the energy system and enhances resilience to climate-related and operational risks. Within ESB's Sustainability Leadership Plan, infrastructure investment is guided by the integration of sustainability considerations into planning, design and decision making, ensuring that network development supports environmental protection, positive community outcomes and long-term system resilience.

Our approach

Since our foundation, ESB has always played a key role in Ireland's social and economic development and will play a critical role in delivering this transformation. Through sustained investment under Price Review 6 (PR6) and beyond, we are addressing immediate customer needs while laying the foundations for a clean electric future. This includes building the capacity required for a Net Zero Ready Distribution Network by 2040, optimising the use of existing assets, and deploying smart technologies and innovative solutions to manage network constraints efficiently. Alongside physical infrastructure investment, we are strengthening digital, data, cybersecurity and system operation capabilities, including through the Distribution Markets and System Operation (DMSO) function, to support a more flexible, efficient and customer-enabled electricity system.

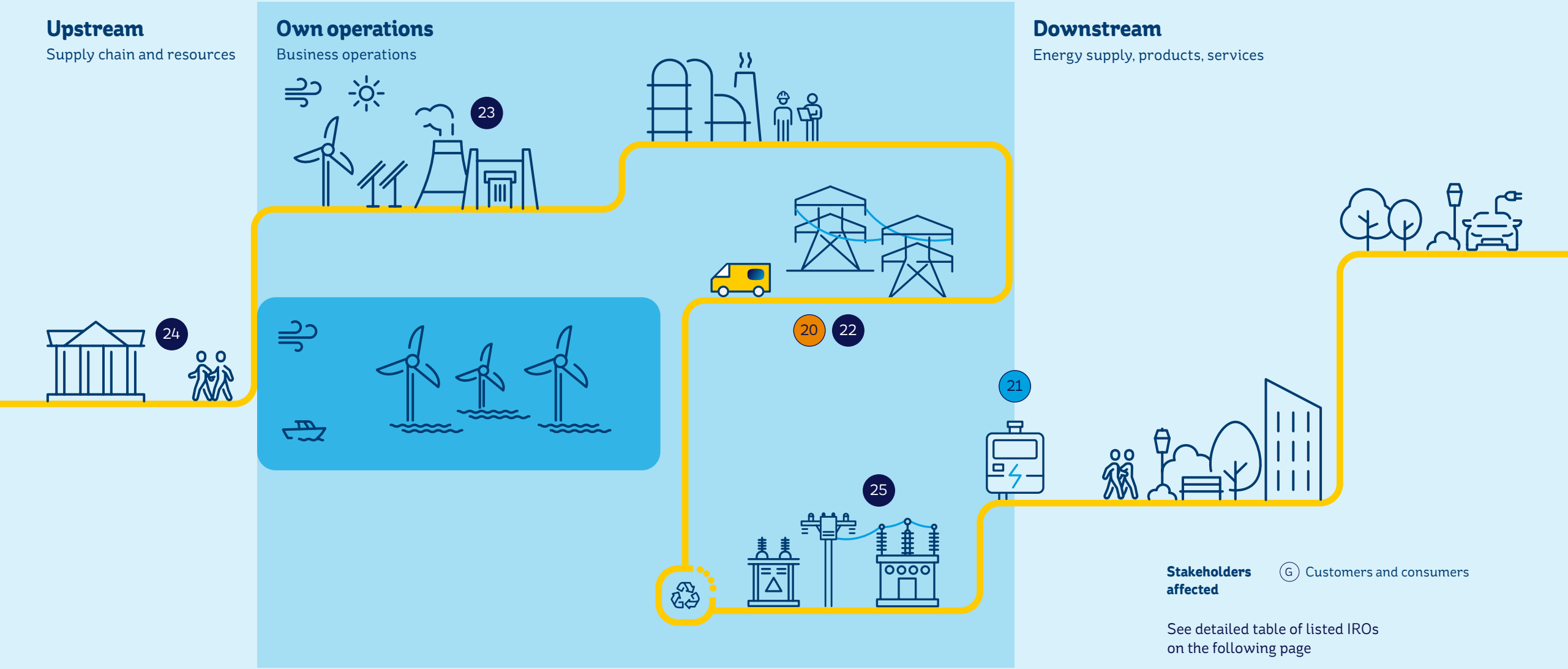
Through this approach, ESB is modernising the electricity network to support economic growth and societal needs, empower customers to participate in climate action and ensure the system remains secure, resilient and adaptable to evolving system needs.

Entity specific

Investing in modern reliable infrastructure and developing a smart and flexible electricity network continued

Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Material impacts, risks and opportunities



Stakeholders affected (G) Customers and consumers

See detailed table of listed IROs on the following page

Entity specific

Investing in modern reliable infrastructure and developing a smart and flexible electricity network continued

Timeframe
S Short term
M Medium term
L Long term

Value chain location
U Upstream
O Own operations
D Downstream

Material impacts, risks and opportunities continued

Managing these IROs

The delivery of a modern, reliable and decarbonised electricity network is shaped by a set of identified interconnected risks and opportunities. These relate to network maintenance, capacity expansion, customer-led flexibility, regulatory approvals and the measures required to safeguard national security of supply as renewable generation increases. For key actions taken and future actions planned for managing these IROs, please see Actions on page 57.

Material IRO		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 22 Investing in modern, reliable infrastructure and developing a smart and flexible electricity network				
20	**Positive impact through investment in and maintenance of networks** – to ensure security of supply		S	O
21	**Opportunity created through investment in system flexibility** – investment in system flexibility now can reduce the need for new infrastructure, which can reduce costs associated with infrastructure updates		S	O
22	**Risk related to maintenance and replacement of assets** – there is a risk of significant costs associated with maintenance and replacement of damaged and/or ageing high-value generation and network assets		S	O
23	**Risk of failure to deliver complex network infrastructures and systems** – failing to deliver the growing and increasingly complex network infrastructures and systems required to meet future customer and societal needs of accommodating more renewables, supporting wholesale electrification and distributed energy services		S	O
24	**Risks related to approval of plans and licences** – dependence on regulatory and government bodies for the approval of plans and provision of licences		S	U
25	**Security of supply risk** – risk of capacity shortfall in electricity generation and/or fuel supply issues, such as insufficient generation capacity to meet peak demand, could lead to a negative impact on ESB's reputation and potential demand management measures		S	O

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Key to IROs
Negative impact
Positive impact
Financial risk
Financial opportunity

Entity specific

Investing in modern reliable infrastructure and developing a smart and flexible electricity network continued

Actions

The following actions demonstrate how we are proactively managing impacts and risks and progressing opportunities across our network.
The tables below set out the practical measures, both completed and planned, that will enhance system performance, support flexibility, and safeguard security of supply.

IRO		Current actions
20	**Positive impact through investment in and maintenance of networks**	To reduce the likelihood of equipment failing under normal circumstances, we undertake maintenance and replacement programmes, using asset health models and more advanced systems to enable an evidence-based approach to risk management.
		Future actions
		Informed with more asset condition and climate data, we propose to undertake targeted asset replacement and maintenance programmes to improve network performance, enhance reliability and give customers the confidence they need to adopt low-carbon technologies.
IRO		**Key actions taken**
21	**Opportunity created through investment in system flexibility**	We initiated a pilot to facilitate early access to the distribution network on a flexible basis for generation projects. Wind, solar, and community energy projects are participating in the pilot. Of their total output of circa 40 MW, circa 5.65 MW is contracted on a flexible basis, with the first flexible access project energised in October 2024.
IRO		**Future actions**
22	**Risk related to maintenance and replacement of assets**	As we scale up to deliver a much larger capital investment programme, we are proposing to undertake significant measures to protect the health, wellbeing, and safety of the public and the communities we serve. Our risk-based approach to asset maintenance and replacement will reduce risks associated with aging assets, while our public safety campaigns will help to ensure a high level of awareness around the risks and dangers associated with the electricity network.
		As demand for electricity grows, it is important that HV substations can continue to reliably serve customers and are not at risk of failure. During PR6, we are planning to undertake an extensive asset replacement and upgrade programme, targeting highest-risk substations first.

IRO		Future actions
23	**Risk of failure to deliver complex network infrastructures and systems**	Our intention is to move away from piecemeal asset replacements and repairs and adopt a Build Once for 2040 approach involving full station replacements where appropriate. Where there is sufficient room, we intend to build on greenfield sites and use modular solutions to accelerate delivery.
IRO		**Key actions taken**
24	**Risks related to approval of plans and licences**	Together, EirGrid and ESB Networks have developed a CRU-approved process for early engagement on transmission projects to ensure that key deliverability aspects are considered up front in the project life cycle. The objective here is to address project development questions at the earliest possible opportunity so that the required infrastructure can be delivered efficiently.
IRO		**Key actions taken**
25	**Security of supply risk**	Due to the current system capacity and security of supply challenges, ESB Networks will be accelerating projects to connect emergency generation plant until newer, more flexible generators and storage solutions come on stream for system stability and for back-up during low wind periods.

E4 Biodiversity and ecosystems

Photo credit
Thanks to John Wallace.

Topical disclosure structure

Why this matters

Biodiversity underpins the essential resources upon which all life depends. As a business, ESB is acutely aware of the issue of biodiversity loss, which is a significant social, environmental, political and economic issue at the local, regional and global scale. Impactful engagement across all sectors of state and society is urgently needed to stop the continued erosion of nature.

As an organisation with a large physical footprint and extensive land, water and infrastructure assets, ESB recognises that its activities can both impact and support nature. Addressing biodiversity loss is therefore a critical component of sustainable development and an important consideration in how ESB plans, builds and operates energy infrastructure for the long term.

Our approach

Biodiversity action is embedded within ESB's Sustainability Leadership Plan, where it forms a core part of the Place pillar. This reflects our commitment to moving beyond a focus on carbon to consider wider environmental impacts, and to ensuring that the transition to net zero is delivered in a way that protects and enhances ecosystems, avoids unintended harm and contributes positively to nature restoration. Healthy ecosystems also play an important role in climate adaptation, supporting the resilience of infrastructure and assets to risks such as flooding, heat stress and ecosystem degradation, and reinforcing the delivery of ESB's Net Zero by 2040 Strategy.

Our ambition is to be nature positive by 2030, meaning that our activities reduce negative impacts on nature while actively contributing to its restoration and protection. To support this ambition, we are developing a group-level biodiversity strategic roadmap, building on existing business unit strategies, to strengthen our understanding and management of biodiversity-related physical, transition and systemic risks. The roadmap will embed the mitigation hierarchy across projects and operations, integrate biodiversity considerations into planning and delivery, and set out clear actions, targets and outcomes. This approach is already being advanced through initiatives such as Networks for Nature in ESB Networks and the Sustainable River Strategy in ESB Generation Trading, supporting a consistent, integrated and long-term approach to biodiversity across the Group.

Nature Positive: Definition

Nature Positive is a global societal goal defined as 'halt and reverse nature loss by 2030 on a 2020 baseline, and achieve full recovery by 2050'. To put this more simply, it means ensuring more nature in the world in 2030 than in 2020 and continued recovery after that.

E4 Biodiversity and ecosystems continued

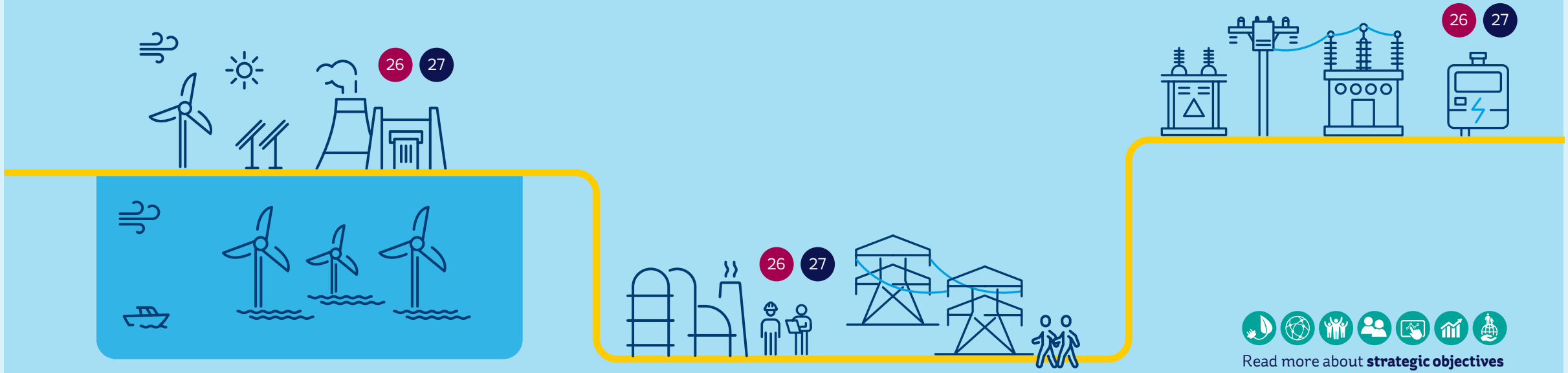
Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Timeframe
- S Short term
- M Medium term
- L Long term

Value chain location
- U Upstream
- O Own operations
- D Downstream

Material impacts, risks and opportunities

Own operations
Business operations



Read more about **strategic objectives** and **foundational capabilities** on page 17

Material IRO E4-SBM-3		Strategic Objectives/ Foundational Capabilities	Time-frame	Location in Value Chain
Sustainability matters: 4 Direct impact drivers of biodiversity loss 5 Impacts on the state of species 6 Impacts on the extent and condition of ecosystems 7 Impacts and dependencies on ecosystem services				
26	**Negative impact on ecosystems in Ireland and UK through land degradation, disturbances to habitats and displacement of species** – due to construction and operation of renewable energy assets		S M L	O
27	**Risk of project (e.g. generation development or network assets projects) delays** – potential project delays arising from ecological assessments, which are undertaken to avoid/reduce/mitigate impacts to biodiversity		S	O

E4 Biodiversity and ecosystems continued

Material impacts, risks and opportunities continued

As part of our DMA, we've identified two IROs that are material to our business, relating to Biodiversity and Ecosystems.

To manage these IROs, we've adopted a structured and evolving approach that integrates biodiversity considerations into project development, operational management, and environmental governance. We consider the biodiversity impacts of existing or proposed infrastructure in all areas within or in proximity to protected sites, as set out by national, regional or EU legislation. We also review potential impacts on other habitats and species of ecological importance which occur in non-designated areas in the wider countryside. All new projects, as well as proposed operational and maintenance activities, are screened at an early stage to determine the need for Environmental Impact Assessment (EIA), Ecological Impact Assessment (EcIA) or assessments deriving from the EU Habitats Directive (Appropriate Assessment (Ireland) or Habitats Regulations Assessment (UK)). These assessments allow us to make iterative revisions to project design or operational activities and implement any associated mitigation measures as appropriate.

To support this, we maintain an internal Group Standard for Biodiversity and Ecosystems, which defines a suite of measures to ensure compliance with relevant biodiversity legislation and encourage the sustainable management of biodiversity across the business. Our commitment to biodiversity is supported by specialist environmental staff, including an expanding in-house team of ecologists with considerable experience and expertise in terrestrial, freshwater, and marine ecology. We also operate a number of external ecological and environmental consultant frameworks to support our internal experts. Our biodiversity specialists are embedded across project development and operational lifecycles and provide advisory support and training to employees and teams across the business as required.

Through the course of 2025, we developed a Biodiversity Impact Driver assessment, enhancing our ability to identify and manage biodiversity-related impacts – see Figure 1 on the next page. It has been applied to all asset classes across the ESB Group, including energy generation technologies, transmission and distribution infrastructure, substations, offices and depots. This methodology supplements the DMA and will enable future site-level evaluation of biodiversity impacts, risks and opportunities. It will allow us to identify sites with significant potential or actual impacts on biodiversity-sensitive areas, and we will use it to inform how we prioritise mitigation actions in target locations.

E4 Biodiversity and ecosystems continued

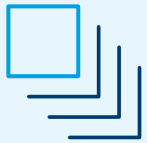
Figure 1: **Summary of steps in our Biodiversity Impact Driver assessment undertaken in 2025**

Impact Driver Approach

1 Identify

Identify our owned, managed or leased assets across all relevant business units and jurisdictions

2 Classify

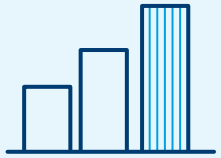


Group the respective assets into 'asset classes' according to the operational nature of the infrastructure or technology

3 Assess

Consider the potential biodiversity impacts of each asset class against the six primary drivers of biodiversity loss, namely Land use change, Direct exploitation, Pollution, Changes to freshwater/marine ecosystems, Invasive alien species and Climate change

4 Rank

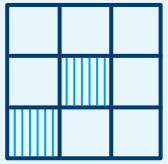


Undertake a ranking exercise, identifying the asset classes with the highest potential for significant impacts to biodiversity, based on a cumulative impact score across the six biodiversity loss drivers

5 Map

Cross-reference the locations of operational sites from the asset classes with the highest potential for significant biodiversity impacts against relevant geospatial databases of biodiversity-sensitive areas. Such areas intersecting with a 10 km buffer from an operational site are considered 'in or near'

6 Calculate



Tabulate the output of the geospatial intersect analysis, detailing the total number of operational sites located in or near biodiversity-sensitive areas

The Impact Driver assessment identified the following asset classes with the highest potential to negatively impact biodiversity-sensitive areas:

Thermal generation

- Land use change
- Contribution to climate change through atmospheric emissions
- Effects on aquatic ecosystems due to cooling water abstractions and outfalls

Hydro generation

- Land use change
- Effects on aquatic ecosystems due to diversions, abstractions and catchment connectivity reduction
- Effects on aquatic species arising from mortality risk

Onshore wind

- Land use change
- Effects on species due to disturbance or displacement
- Effects on species arising from collision mortality risk

E4 Biodiversity and ecosystems continued

Targets

E4-4

Our Sustainability Leadership Plan sets clear targets that reflect our ambition to lead in biodiversity action across our operations. Through our DMA process, we identified the potential for negative impacts on ecosystems in Ireland and the UK. Our targets address these potential impacts by fostering a nature-positive approach to our activities.

These targets are also aligned with national and international frameworks including Ireland's National Biodiversity Action Plan and the Kunming-Montreal Global Biodiversity Framework. They're designed to support long-term ecological resilience and responsible land stewardship, which also ties back to our IROs in this area. As we work on our group biodiversity strategic roadmap, we'll be creating a series of further detailed and measurable targets.

TARGETS

T 1 Biodiversity net gain on new capital projects

Target: We're committed to delivering Biodiversity Net Gain (BNG) on 100% of new capital onshore projects located on newly acquired ESB land by 2030.

Description: This target primarily applies for projects in Ireland, while aligning with evolving national and regional planning requirements in the respective jurisdictions where we operate. This reflects our ambition to embed biodiversity considerations into the earliest stages of project development. This commitment applies exclusively to land owned by ESB and does not include offsetting or land banking approaches.

T 2 Site-level biodiversity action plans

Target: By 2030, all ESB sites will implement actions aligned with the All-Ireland Pollinator Plan or equivalent biodiversity management plans.

Description: This reflects our broader commitment to enhancing biodiversity across our operations and builds on the success of pollinator initiatives already in place. We'll tailor site-level plans to local ecological conditions, informed by best-practice case studies from across the business.

T 3 Nature-positive river and lakeside habitats

Target: We'll implement a nature-positive approach along 30% of ESB-owned river channel or lakeside habitat by 2030, in line with the Global Biodiversity Framework and the EU Nature Restoration Law.

Description: This target focuses on protected sites and prioritises ecosystem-level restoration. By targeting land we own, we ensure effective stewardship and long-term ecological outcomes, supporting our longer-term ambition to enhance biodiversity across all relevant habitats by 2050.

E4 Biodiversity and ecosystems continued

Actions

E4-3

We're committed to actively supporting nature restoration across our activities. This includes taking targeted actions to mitigate potential negative impacts and address the key risks identified through our DMA. The following tables outline specific measures we're taking and planning to reduce these impacts and support the delivery of our biodiversity-related objectives.

IRO		Link to targets	Key actions taken	Future actions
26	**Negative impact on ecosystems in Ireland and UK through land degradation, disturbances to habitats and displacement of species** – due to construction and operation of energy assets	T 1	When developing new energy infrastructure, we take a range of actions to identify and mitigate potential impacts on biodiversity. All significant projects undergo applicable ecological assessments as required throughout the project development and operational lifecycles.	A broader rollout of the BNG toolkit is planned for projects during 2026, to support the journey to developing all new onshore project sites for BNG by 2030. Under PR6, ESB Networks has secured approval for a number of other actions tied to the Networks for Nature biodiversity strategy. These will be implemented during the 2026–2030 operational period of PR6. Priority actions for 2026 under the Sustainable River Strategy include implementing Green Schedule measures in pilot areas such as the Shannon Callows and the Gearagh; removal of invasive species from the Gearagh alluvial forest; and developing technical plans/options to improve fish passage on the Lee, Liffey and Erne systems.
		T 1 T 2 T 3	Our ecology team, supported by a consultant framework for terrestrial, freshwater, and marine ecology, provides advisory and training support across all stages of the asset lifecycle. These resources are critical to making sure we embed biodiversity considerations in day-to-day operations. An additional specialist ecological services framework was established during 2025 to cover highly specialised services including bat surveys, invasive species management and marine mammal surveys.	
		T 2	We're continuing to consolidate and refine spatial datasets of our landholdings as a foundation for biodiversity baselining. This work supports the development of site-specific management plans and future target setting.	
		T 2	We've drafted a suite of pollinator-friendly measures for suitable operational sites, which we'll scale up through tailored site management plans.	
		T 1	During 2025, we piloted a BNG methodology and toolkit adapted for Irish landscapes. This toolkit was tested across at least five ESB Networks substation site acquisition or redevelopment workflows. The pilot aimed to evaluate the toolkit's effectiveness and inform future implementation.	
		T 3	As part of the delivery of our Sustainable River Strategy, we have initiated work to enhance ecological conditions across suitable ESB-owned lands by 2030, through improving breeding wader habitats, establishing native woodlands and delivering other targeted interventions. As an example of this work, tree seed collection in the Gearagh alluvial forest was completed at the end of 2025 to support future tree planting efforts.	
		T 1 T 2	In 2025, ESB continued its funding of the final stages of the Nature+Energy project, having facilitated access to Carnsore Wind Farm for biodiversity research over the past five years. Biodiversity actions and sectoral guidelines developed by Nature+Energy provide evidence-based pathways for the wind energy industry to contribute to habitat and biodiversity restoration and enhancement at both development and operational stages.	

E4 Biodiversity and ecosystems continued

Actions continued

To mitigate the risk of project delays arising from biodiversity-related assessments, we've implemented strategic and operational measures as detailed in the below table.

IRO		Key actions	Future actions
27	**Risk of project (e.g. generation development or network assets projects) delays** – potential project delays arising from ecological assessments, which are undertaken to avoid/reduce/mitigate impacts to biodiversity	We incorporate early-stage ecological screening into project planning, making sure that we employ and resource people with the appropriate ecological experience and expertise. We've expanded our internal capacity by recruiting additional ecology specialists. We engage in horizon scanning and make use of innovative datasets and technologies to inform site and route selection as part of projects. This helps to avoid ecologically sensitive areas and reduce the likelihood of delays. We take part in industry forums and collaborate with peers to align with best practice and evolving regulatory expectations.	We're developing a more comprehensive ecological services framework to replace the current model. This will enhance our ability to respond to regulatory requirements and streamline project delivery.

CASE STUDY

Growing a Greener Future – NIE Networks and The Conservation Volunteers

IROs
See page 59
26

The context
NIE Networks manages vegetation near overhead lines for safety, and unfortunately this often means removing trees. To create a nature-positive approach, we wanted to offset the impact.

What we did
NIE Networks launched one of Northern Ireland's most ambitious biodiversity programmes, partnering with The Conservation Volunteers (TCV). The project restores habitats and enhances local ecosystems through large-scale tree planting.

Volunteers are planting birch, willow, oak, alder, and other native varieties to support biodiversity and climate resilience. Tree-planting sites include community spaces, schools, and council-owned lands across Northern Ireland – strengthening community ties.

TCV provides expertise in native species planting and habitat restoration. NIE Networks supports TCV with resources, including an electric vehicle for low-carbon operations, and collaborates on seed collection and nursery cultivation to make sure the trees are local.

The impact we're creating
So far, volunteers have planted 24,000 trees since 2023, with a target of planting 20,000 trees in the 2025/26 season. The project also supports employee engagement and involvement. For example, the Give a Tree a Home campaign encourages staff to plant saplings at home. The project also sees a new tree planted for every new NIE Networks employee, symbolising growth and sustainability.

What's next
Our long-term ambition is to plant 30,000 trees annually. This initiative reflects NIE Networks' commitment to net zero and environmental stewardship, making sure that sustainability is embedded in its core operations.

E4 Biodiversity and ecosystems continued

Actions continued

CASE STUDY

Building skills for a sustainable ocean – ESB's Marine Mammal Observer Programme

IROs
See page 59
27

The context
Offshore wind is a key contributor to the global effort against climate change and the transition to a zero-carbon economy. As ESB advances its offshore wind projects under our net zero strategy, we are committed to promoting the Marine Mammal Observer (MMO) role in Ireland and increasing the number of qualified professionals through bespoke training programmes. MMOs are specialist environmental consultants who monitor marine megafauna – such as whales, dolphins, porpoises, seals, and basking sharks – during offshore activities to ensure compliance with environmental regulations and minimise ecological disruption.

What we did
We developed and funded a dedicated Marine Mammal Observer training programme, which is run with the Irish Whale and Dolphin Group (IWDG). It has also been endorsed by UNESCO's Intergovernmental Oceanographic Commission, the Institute of Marine Engineering, Science and Technology (IMarEST), and the Marine Mammal Observer Association (MMOA).

The aim of the programme is to assist in developing marine ecology education and skills to support successful applicants at the early stages of their careers in the marine environmental profession. The programme involves a mix of both classroom and field training, which includes an offshore sea survival course at the National Maritime College of Ireland (NMCI) in Cork. The highlight for many participants is the training weekend in Kilrush, Co. Clare, while they also spend a half day on the IWDG research vessel called The Celtic Mist.

The programme is open to graduates, final-year undergraduates and postgraduate students who are studying or working in the area of marine science or related disciplines.

The impact we're creating
This MMO programme has been formally endorsed as a 'Decade Action Contribution' to the *United Nations Decade of Ocean Science for Sustainable Development (2021–2030)*. Additionally, this programme was the winner of the 'Renewable Skills Champion' Award at the 2025 Irish Renewable Energy Awards. By the end of 2025, 16 graduates have completed the fully funded programme, gaining essential certifications, offshore survival training, and field experience.

What we're doing next
We are committed to reinforcing leadership in sustainable offshore energy and ensuring best-practice marine mammal observation in our projects. Through continued collaboration with the broader industry, we intend to support conservation, sustainable use of marine resources, and ecosystem protection.

E4 Biodiversity and ecosystems continued

Metrics

E4-5

To support transparency and accountability in our approach to biodiversity and ecosystems, ESB is collating a robust set of metrics aligned with ESRS disclosure requirements. We also gather other data as part of our ongoing work to measure and support continuous improvement.

In this section, we're sharing data that describes sites that are owned, managed, or leased by ESB Group, and which are located in or near biodiversity-sensitive areas. For the purposes of this metric disclosure, we have based our assessments on the following protected sites classified as biodiversity-sensitive areas:

SAC	**Special Area of Conservation**
SPA	**Special Protection Area**
NHA	**Natural Heritage Area (ROI)**
ASSI	**Area of Special Scientific Interest (NI)**
SSSI	**Site of Special Scientific Interest (GB)**

We used the results of the Biodiversity Impact Driver assessment (see page 61) to identify the asset classes and associated sites in scope: those that potentially significantly impact biodiversity-sensitive areas during their respective operational phases.

We identified in-scope asset classes as hydro, onshore wind, and thermal generation and applied a 10 km buffer around all operational sites in these asset classes. From here, we assessed and quantified any designated biodiversity-sensitive areas inside these buffer zones that could potentially be negatively impacted and calculated the number of relevant operational sites. It should be noted that the existence of any protected sites within the 10 km buffer does not imply the occurrence of actual impacts to such sites.

An example of the mapping approach taken to identify biodiversity sensitive areas in proximity to ESB sites is presented in Figure 2 to the right.

Table 1 presents the output metrics of the spatial analysis for the ESB hydro, wind and thermal generation asset classes.

Figure 2:

Biodiversity-sensitive areas within 10 km of ESB operational sites

Example of the spatial analysis undertaken to identify the occurrence of any biodiversity-sensitive areas within 10 km of an operational ESB site.

Example analysis shown: **Aghada Generating Station**

E4 Biodiversity and ecosystems continued

Metrics continued

Table 1: **Metrics related to biodiversity and ecosystems**

Asset class	Potential contribution to drivers of biodiversity loss	Total number of ESB sites within asset class, across all geographical areas	Geographical area	Total number of ESB sites within asset class	Total number ESB sites within 10 km of a biodiversity -sensitive area	Cumulative count of biodiversity-sensitive areas within 10 km of an ESB site		
						SPA (ROI, NI & GB)	SAC (ROI, NI & GB)	National Designation Site (NHA/ ASSI/SSSI)
Hydro	Potential for land use change and effects on aquatic ecosystems due to diversions, abstractions and connectivity reduction	10	ROI	10	9	17	25	5
			NI	0	0	2	4	20
			GB	0	0	0	0	0
Onshore Wind	Potential for land use change and effects on species due to disturbance, displacement and collision mortality risk	23	ROI	14	14	16	38	22
			NI	6	6	1	14	56
			GB	3	3	1	4	49
Thermal	Potential for land use change, contribution to climate change through emissions and effects on aquatic ecosystems due to cooling water abstractions and outfalls	12	ROI	9	9	32	33	3
			NI	1	1	1	1	3
			GB	2	2	0	2	20
			Total	**45**	**44**	**70**	**121**	**178**

E4 Biodiversity and ecosystems continued

Policies

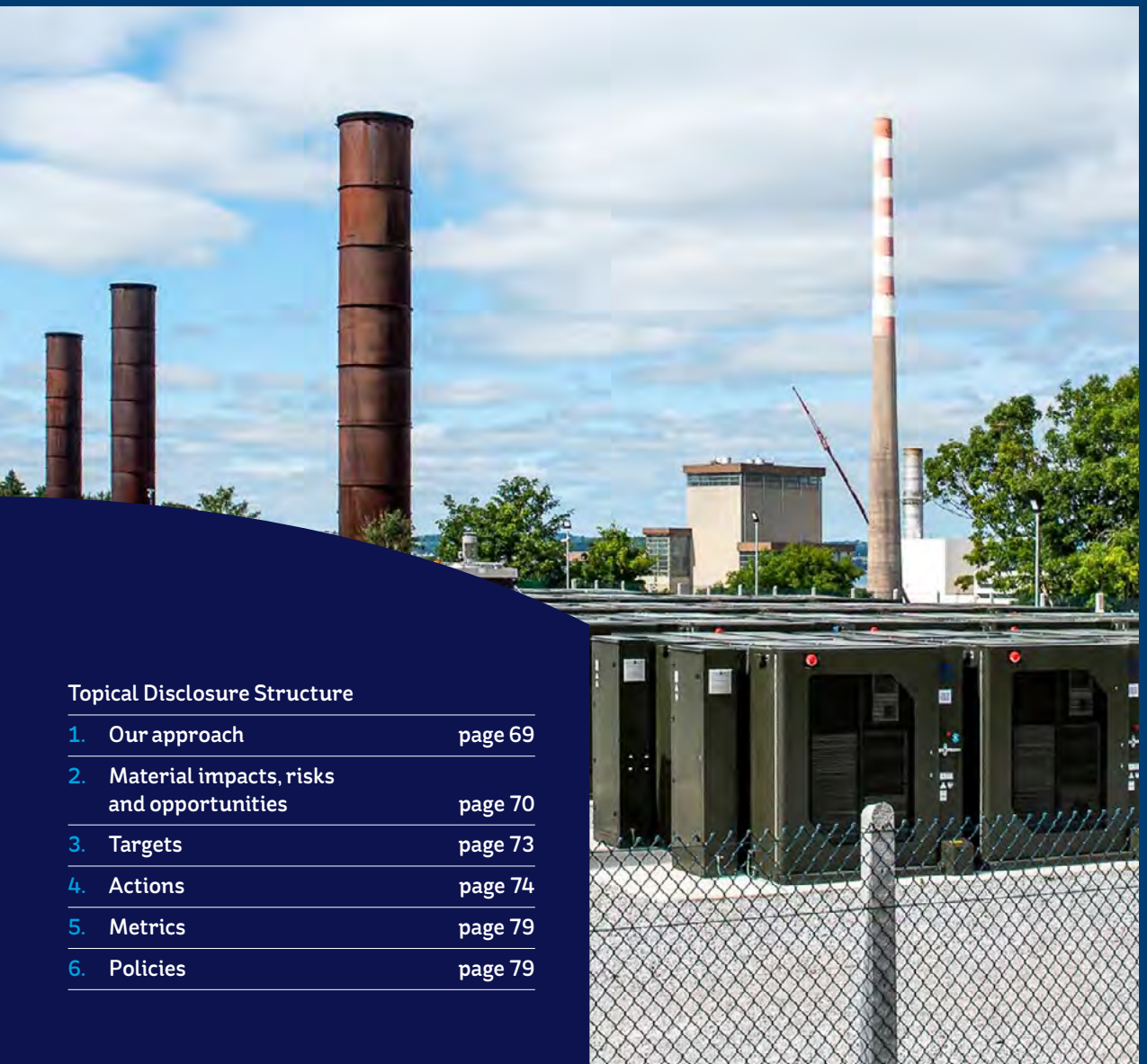
E4-2

Biodiversity is managed under our Environmental and Sustainability Policy. This policy sets out the principles we need to follow to ensure compliance and guide progress to achieve our goals in this area. It integrates these considerations into our environmental management processes and risk management framework. It's aligned with our broader sustainability strategy.

The policy applies to everyone who works at ESB, including Board members, employees, contractors, and agency workers. The Head of Sustainability is accountable for implementing the policy, which commits ESB to conducting its activities in an environmentally responsible manner and in compliance with all relevant regulatory planning, environmental, and sustainability legislation. We review the policy periodically and update it as necessary.

Photo credit
Thanks to Mark Phelan.

E5 Resource use and circular economy



Topical Disclosure Structure

Why this matters

Responsible resource use and circular economy principles are central to delivering ESB's Net Zero by 2040 ambition in a resilient and sustainable way.

Resource use and circular economy are central to how ESB delivers its Driven to Make a Difference: Net Zero by 2040 Strategy in a sustainable, resilient and responsible way. As a capital-intensive electricity utility, ESB relies on significant volumes of materials, assets and infrastructure across our generation, networks and customer-facing businesses. How these resources are sourced, used, maintained and ultimately recovered has a direct impact on our environmental footprint, cost base, security of supply and long-term value creation.

Within ESB's Sustainability Leadership Plan, resource use and circular economy sit within the Planet pillar, reflecting the recognition that the net zero transition cannot be delivered through decarbonisation alone. The scale and pace of infrastructure investment required to support electrification increases demand for materials such as steel, concrete, copper and critical minerals, while also creating end-of-life challenges for assets, including wind turbines, solar panels, batteries and network equipment. Adopting circular economy principles enables ESB to reduce reliance on virgin materials, minimise waste and pollution, and design assets and systems for longevity, reuse and recovery.

Our approach

Resource use and circularity is an emerging focus area for ESB. While we are at the early stages of developing a formal, group-wide approach, we are building on a strong foundation of work already underway across our business.

Our approach focuses on embedding sustainable resource use and circularity across the organisation, from the materials and equipment brought into our operations to how infrastructure is designed, built, maintained and decommissioned. We are working to extend asset life, reduce waste, promote reuse and ensure materials are managed responsibly at end of life. To build on existing activity, we are developing a group-level Resource Use and Circular Economy strategic roadmap, which will define a clear direction and embed circularity more deeply into how we plan and operate across ESB. Through this approach, ESB is strengthening system resilience, reducing value chain emissions and reinforcing the credibility and integrity of its net zero transition, while aligning with evolving regulatory, investor and societal expectations, including CSRD-aligned reporting.

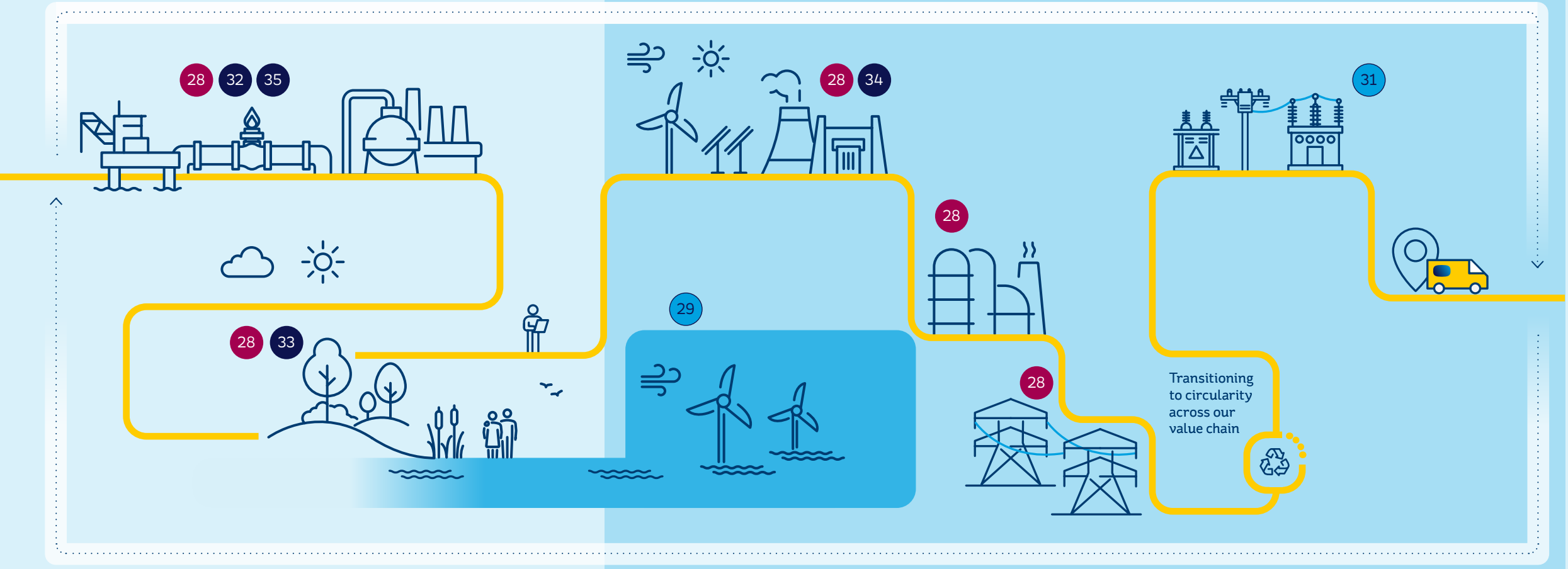
E5 Resource use and circular economy continued

Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Material impacts, risks and opportunities

Upstream
Supply chain and resources

Own operations
Business operations



Stakeholders affected
- (B) Supply chain partners
- (C) Business partners

See detailed table of listed IROs on the following page

E5 Resource use and circular economy continued

Timeframe
S | Short term
M | Medium term
L | Long term

Value chain location
U | Upstream
O | Own operations
D | Downstream

Material impacts, risks and opportunities continued

IRO-1

We've embedded the management of resource use and circular economy-related IROs within our broader sustainability governance and risk management frameworks. Our progress is guided by our Net Zero 2040 Strategy, the Net Zero Pathway Report and Sustainability Leadership Plan as well as our DMA. We are starting to integrate considerations around resource use and circular economy into procurement, operations, and infrastructure development, ensuring that sustainability and environmental risk management are components of decision-making across the organisation. Based on the DMA, our materials resource use relates primarily to resource inflows. An analysis of procurement spend identified input fuels and chemicals used in electricity production and gas supply as the most significant. The relevant metrics for this are on page 79.

We've identified eight IROs that are material to our business, relating to resource use and circularity, outlined in the table to the right.

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Key to IROs
Negative impact
Positive impact
Financial risk
Financial opportunity

	Material IRO	Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 8 Resource inflows, including resource use				
28	**Use of resources** – materials are used in business operations and in the supply chain through production of materials and equipment used by ESB		S	U | O
29	**Opportunities relating to offshore wind** – investment in offshore wind farms, harnessing the power of the wind to generate clean electricity		L	O
30	**Opportunities created through collaboration and partnerships** – establishment of partnerships with other organisations to enhance services and expand ESB's service offering and capacity to deliver large-scale generation projects		M	U
31	**Opportunity for long-term cost savings** – investments in resource efficiency can reduce waste and lead to long-term savings		L	O
32	**Risks associated with energy market and supply chain disruption** – there is a risk of volatility in energy markets and other elements of global supply chains resulting in effects on financial performance and ability to deliver strategic objectives		M	U
33	**Risk of availability of land** – land access is an ever-increasing challenge, there is currently a shortage of land on which to build generation/networks assets		M	U
34	**Reputational risk of resource use** – use of scarce or environmentally damaging resources in own operations through resource extraction or power generation activities could lead to public and investor opposition and damage reputation		M	O
35	**Security of supply risk** – risk of capacity shortfall in electricity generation and/or fuel supply issues such as insufficient generation capacity to meet peak demand, could lead to a negative impact on ESB's reputation and potential demand management measures		M	U

E5 Resource use and circular economy continued

Material impacts, risks and opportunities continued

The waste from our own operations was not identified as material. However, managing waste according to the waste hierarchy and in compliance with relevant legislation and regulation is an important part of our operations and managed by environmental management systems in relevant Business Units. These systems are accredited to ISO 14001. We monitor and report on waste data internally and to external stakeholders and authorities as needed.

Impacts

For material impacts, particularly the use of resources in our operations and supply chain, we focus on responsible sourcing, efficiency, and lifecycle planning. To reduce our inflow of materials we're reducing our reliance on fossil fuels by transitioning to renewable energy sources, ceasing coal operations, reducing the carbon intensity and improving the efficiency of our existing asset to optimise resource efficiency. Our procurement practices are aligned with ISO 20400, and we're embedding sustainability criteria into high-value tenders. We're also developing end-of-life plans for key assets, such as wind turbines, to incorporate circular economy principles – to maximise reuse and recycling, reducing waste and environmental impact.

Risks

We adopt a proactive and integrated approach to risk management, aligned with our strategic objectives and underpinned by a strong risk culture and governance framework. To address the risk around resource inflows, specifically energy market volatility and supply chain disruptions, we employ hedging strategies, dynamic pricing models, and maintain strategic resource levels. We safeguard security of supply through emergency generation initiatives, stakeholder engagement, network management and customer empowerment. We also mitigate reputational risks by aligning our operations with our Code of Ethics and engaging in industry innovation. We're members of the Responsible Commodities Sourcing Initiative (RECOSI), an organisation which works with its members and their suppliers to raise social and environmental standards in energy supply chains. We address land availability challenges through strategic reuse of existing sites, feasibility studies for site development, and strategic partnerships for land acquisition.

Opportunities

We manage opportunities to maximise resource efficiency through strategic investment and collaboration. We're expanding our renewable generation portfolio through partnerships with industry leaders and leveraging and expanding our existing infrastructure to support new technologies. Our actions relating to sustainable resource use are designed to reduce environmental impact, to unlock long-term cost savings and enhance operational resilience. We're committed to embedding circular economy principles into our infrastructure projects and procurement processes as we transition towards a net-zero future.

E5 Resource use and circular economy continued

Targets

E5-3

We're at the start of a journey to develop measurable and actionable targets in response to our DMA, in parallel with our Resource Use and Circular Economy (RUCE) group -level strategic roadmap. As the roadmap progresses, more robust targets around resource use will be developed in conjunction with all of the Business Units.

We've categorised our current and emerging targets by Impacts, Risks, and Opportunities, reflecting the structure of our material IROs.

TARGETS

Use of resources

Phasing out fossil fuels
We ceased coal operations at Moneypoint in June 2025. The station was converted to operate on heavy fuel oil only when required to support system capacity.

Sustainable Procurement
We are committed to ensuring sustainability-related contract award criteria are in use for all major tenders.

End-of-Life Planning for renewable energy assets

By 2025: Establish end-of-life guidelines for wind turbines.

2026–2030: Expand to include solar panels and batteries, with pilot projects informing best practices.

Reputational, supply chain, land, and security of supply

RUCE strategic roadmap
Develop a group-level RUCE strategic roadmap by the end of 2026, formalising approach to embedding circularity across all of ESB.

Life Cycle Analysis
Embed Life Cycle Analysis (LCA) as a core guiding principle within ESB's Group-Level Resource Use and Circular Economy strategic roadmap, so that life cycle impacts are incorporated into major decisions. Launch targeted pilot projects across key asset classes to incorporate LCA.

Renewable expansion, cost efficiency, and collaboration

Innovation and collaboration
Annually identify and pursue key collaborative initiatives that support RUCE and net zero goals, in alignment with the strategy.

Continue participation in industry forums and research partnerships (e.g. Circuléire, MaREI, RECOSI, ISEA), Wind Energy Ireland, WindEurope, ORE Catapult, WindEurope Sustainability Working Group, CIGRE, EPRI, EurElectric, ENA, and SEAI).

Circular design and infrastructure
Develop and integrate circular economy principles within the design phase of projects.

These targets reflect ESB's commitment to continuous improvement, transparency, and alignment with ESRS disclosure expectations. As our RUCE strategic roadmap is developed, we will refine and expand these targets to ensure they remain ambitious, measurable, and impactful.

E5 Resource use and circular economy continued

Actions

E5-2

Our actions are informed by the outcomes of our DMA. They're designed to mitigate negative impacts, reduce risks, and capitalise on opportunities. These actions span strategic planning, innovation, stakeholder engagement and operational improvements.

We're developing a Group-wide Resource Use and Circular Economy (RUCE) strategic roadmap to embed resource use and circular economy principles into strategic planning, governance, and operations. While EU legislation, policy and market direction is guiding the sector towards circularity, we recognise the global challenges in developing resilient, circular supply chains, particularly due to the absence of mature enabling systems. Innovation and collaboration – both within ESB and across our value chain – will be critical to overcoming these barriers and delivering a sustainable transition to net zero. Engaging with our suppliers and the wider Irish ecosystem will be critical to driving the development of a more circular ESB.

We've already started work to ensure that sustainability is embedded across the lifecycle of our assets – from design and procurement to operation and end-of-life. We've grouped our current and future actions under the three categories of material IROs, reflected in the tables adjacent and on the following pages.

IRO		Key actions taken	Future actions
28	**Use of resources** – materials are used in business operations and in the supply chain through production of materials and equipment used by ESB	We're continuing to transition away from fossil fuels. ESB marked a significant milestone in ending all coal operations at our plant in Moneypoint in June 2025. The station was converted to operate on heavy fuel oil only when required to support system capacity, alongside the other measures in the security of supply programme from the CRU.	We're embedding circular economy principles across our operations by developing end-of-life plans for wind turbines, solar panels, and batteries, with a particular focus on wind turbines initially. The development of end-of-life plans for batteries and solar panels will be the focus for 2026. Implement working groups to establish circular design, circular operation, waste and innovation across the business. Develop quantifiable and verifiable sustainability-related award criteria that are integrated into contracts. The procurement working group to deploy sustainability criteria into high-value tenders ensuring that suppliers align with our circular economy goals.

E5 Resource use and circular economy continued

Actions continued

CASE STUDY

Life Cycle Assessment (LCA) pilot for substations

IROs
See page 71
28 31

The context
Life Cycle Assessments (LCAs) aim to quantify the embodied carbon associated with substation construction and operation, covering all stages from material extraction and manufacturing, through construction and transportation, to operational use and end-of life. This holistic approach ensures that sustainability is considered throughout the asset lifecycle, not just during operation.

What we did
ESB conducted a case study assessment to baseline embodied carbon used from cradle to practical completion stages of selected standardised substation designs. The objective was to undertake an embodied carbon assessment of the building material usage and, following this baselining exercise, identify elements where embodied carbon reduction could be pursued.

The impact we're creating
This initiative supports the sustainable use of resources, reinforcing ESB's commitment to UN SDG 12, 'Responsible Consumption and Production'. The outcomes have enhanced our understanding of the impact that current designs and material choices have on the embodied carbon of our substation assets. The study provides opportunities to engage with stakeholders to challenge design assumptions, inform further optimisation and embodied carbon reduction through a value led approach, which may include for example low carbon concrete alternatives and reuse of steel.

Lessons learned are being incorporated into new designs and ways of working, advancing ESB's sustainability journey.

What we're doing next
ESB's Engineering & Major Projects Business Unit will engage stakeholders to share findings and build capacity for substation LCAs. Future work will focus on impact assessment and targeting materials for reduced carbon alternatives. The methodology will be applied to future substation projects, with a focus on continuous improvement.

E5 Resource use and circular economy continued

Actions continued

IRO		Key actions taken
32	**Risks associated with energy market and supply chain disruption** – there is a risk of volatility in energy markets and other elements of global supply chains resulting in effects on financial performance and ability to deliver strategic objectives	We manage these risks through our group principal risk process. This framework ensures that material risks are identified, assessed, and mitigated in line with strategic objectives. We embed actions such as hedging, dynamic pricing, strategic procurement, and stakeholder engagement within our broader sustainability and risk governance structures, to support resilience and continuity. Further detail is available in the ESB 2025 Annual Report.
35	**Security of supply risk** – risk of capacity shortfall in electricity generation and/or fuel supply issues, such as insufficient generation capacity to meet peak demand, could lead to a negative impact on ESB's reputation and potential demand management measures	This is managed through a combination of emergency generation capacity, smart metering, and stakeholder engagement.
		We maintain fuel reserves, deploy temporary emergency generators, and implement contingency policies to ensure stability.
		Our project and operational management systems and ongoing engagement with CRU's Security of Supply Programme help manage constraints and ensure timely resolution of issues.
34	**Reputational risk of resource use** – use of scarce or environmentally damaging resources in own operations through resource extraction or power generation activities could lead to public and investor opposition and damage reputation	We've made strong public commitments to resource efficiency and fossil fuel elimination. Our Net Zero 2040 Strategy and participation in initiatives such as RECOSI demonstrate our dedication to responsible sourcing.
		We actively engage with various groups including communities, industry, and academia through forums like the Research Ireland Centre for Energy, Climate and Marine research and innovation (MaREI) and the Supply Chain Sustainability School. This ensures that our actions contribute to the development of a circular economy in Ireland, while being transparent and inclusive. In 2025, ESB joined Circuléire, which is an industry-led research consortium for circular economy.

E5 Resource use and circular economy continued

Actions continued

IRO		Future actions
29	**Opportunities relating to offshore wind** – investment in offshore wind farms, harnessing the power of the wind to generate clean electricity	We're expanding our renewable generation portfolio. The key actions in climate change Decarbonisation Lever 1: Renewable Generation and Reduction of Fossil Fuels show the actions that also help us take advantage of this opportunity.
30	**Opportunities created through collaboration and partnerships** – establishment of partnerships with other organisations to enhance services and expand ESB's service offering and deliver on our strategic ambitions	We're working with industry and academia to explore and enhance opportunities for the development of upstream and downstream supply chains, critical to embedding circular economy principles and reducing our indirect emissions. We participate in industry forums and collaborate with peers to align with best practice and evolving regulatory expectations.
		Strategic partnerships with Coillte, Ørsted, EDF Renewables and others are enabling the development of large-scale wind and solar projects. These collaborations are essential for scaling our impact and accelerating the transition to a low-carbon future.
31	**Opportunity for long-term cost savings** – investments in resource efficiency can reduce waste and lead to long-term savings	Pilot projects will inform best practices, which will be rolled out over the coming years. These efforts not only reduce costs but also strengthen resilience and sustainability.

Non-material
We are committed to reusing existing equipment so it can remain in service longer, reducing the need for new materials and lowering environmental impact. This includes renewing components, upgrading systems, and returning refurbished assets to where appropriate. These actions support carbon-reduction goals by minimising waste generation and reducing the resource intensity associated with manufacturing new equipment.

E5 Resource use and circular economy continued

Actions continued

CASE STUDY

Circular Economy Refurbishment of Interface Transformers (IFT) Units at ESB Networks

IROs
See page 71 28 31

Before refurbishment

After refurbishment

The context
ESB Networks operates an Interface Transformer (IFT) refurbishment workshop in Tuamgraney, Co. Clare, dedicated to the 20 kV project team and in operation since January 2023. This initiative is a practical example of circular economy principles in action, aiming to extend asset life, reduce waste, and lower embodied carbon compared to purchasing new units.

What we did
The refurbishment steps include units being stripped down, degreased, cleaned, and repainted. New zinc-coated floors and brackets are installed to support reclosers and controllers, and a new control panel including a relay is fitted, enabling full automation.

The impact we're creating
More than 60 IFTs have been successfully refurbished, demonstrating the benefits of a circular approach.

This programme reduces lead times, lowers costs, and embodies direct carbon savings by avoiding the production of new equipment. It highlights ESB's leadership in applying circular economy principles.

What's next
This programme demonstrates ESB Networks' leadership in circular economy innovation, aligning with sustainability goals and supporting Ireland's transition to a more resource-efficient energy sector. This IFT refurbishment workshop will continue to operate, the approach is scalable and can be replicated across other asset types, further embedding circularity into ESB's operations.

E5 Resource use and circular economy continued

Metrics

We're developing a set of metrics on resource use and circular economy, aligned with ESRS E5 disclosure requirements. This will support transparency and accountability in our approach to these areas. These metrics focus on the quantity and type of resource inflows, including fuels, chemicals, and materials used in our operations.

Resource inflows

E5-4

Resource inflows refer to the essential materials and inputs required for our primary activities: the production and sale of electricity and sale of gas. We're currently only including our material resource inflows, with the key technical materials being fuels: natural gas, coal and oil.

Metric	2025 (t)
Total weight of technical materials	2,154,992
Total weight of biological materials	0

We're committed to improving what, and how, we monitor our resource consumption, ensuring transparency and providing an opportunity to reduce virgin material consumption and increase recycled material consumption.

Policies

E5-1

Resource use and circular economy activities are managed under our Environmental and Sustainability Policy. It sets out the principles we need to follow to ensure compliance and guide progress to achieve our goals in this area.

It integrates these considerations into our environmental management processes and risk management framework. It's aligned with our broader sustainability strategy.

The policy applies to everyone who works at ESB, including Board members, employees, contractors, and agency workers. The Head of Sustainability is accountable for implementing the policy, which commits ESB to conducting its activities in an environmentally responsible manner and in compliance with all relevant regulatory planning, environmental, and sustainability legislation. We review the policy periodically and update it as necessary.

Social

In this section

S1 Own workforce

Topical disclosure structure

Why this matters

ESB's people are fundamental to delivering our strategy, maintaining safe and reliable operations, and achieving net zero by 2040.

The scale of transformation required to decarbonise the electricity system and modernise energy infrastructure depends on a skilled, engaged and motivated workforce, supported by strong leadership and an inclusive organisational culture. Within ESB's Sustainability Leadership Plan, employees are a central focus under the People pillar, reflecting our recognition that sustainability outcomes are enabled by people through their expertise, behaviours, innovation and commitment.

Creating a safe, inclusive and supportive workplace is both a moral responsibility and a strategic enabler. This focus aligns directly with ESB's Driven to Make a Difference: Net Zero by 2040 Strategy, which identifies empowered people as a foundational capability underpinning the delivery of decarbonised electricity, resilient infrastructure and empowered customers. The transition to a low-carbon energy system requires new skills, new ways of working and a culture that supports learning, adaptability and collaboration across the organisation.

Our approach

Our People Strategy underpins this approach and is focused on attracting, developing and retaining the talent required to deliver ESB's strategic objectives, while building the culture and capabilities needed for sustained long-term performance. Effective management of safety, wellbeing, working conditions and equal opportunities is central to this strategy. In parallel, ESB is developing a People-Centred Sustainability strategic roadmap, due to be finalised in 2026, which will set out a more comprehensive and integrated approach to social sustainability across our own workforce, workers in the value chain, affected communities, and consumers and end users. Together, these strategies support long-term organisational resilience, strengthen capability and leadership, and ensure ESB can deliver its sustainability ambitions safely, responsibly and in line with stakeholder expectations.

S1 Own workforce continued

Our framework for action

Commitment to equal treatment and opportunities

Equal treatment and opportunities are core to our People Strategy. ESB is committed to building and sustaining a diverse workforce with a culture of inclusion, equity and belonging and to maintaining an environment where people can be themselves, thrive and feel connected to our purpose. Through our DMA, results, we identified both positive and negative material impacts and risks that shape and inform our People Strategy. From this, we identified that women in our workforce experience a material negative impact, reflected in the gender pay gap (GPG) (see more information under Metrics on pages 97–100).

Diversity, Equity and Inclusion (DEI) remained a strategic priority in 2025, underpinning the ambition to build a workforce that reflects the communities served and supports the organisation's Net Zero by 2040 Strategy. Through the people strategy, we also support the UN SDGs, particularly:

SDG 5 Gender Equality

SDG 8 Decent Work and Economic Growth

SDG 10 Reduced Inequalities

Prevention of forced and child labour

We consider the risk of forced or child labour in our own workforce to be low. This is because we maintain strong recruitment controls and adhere to the ILO Fundamental Principles and Rights at Work, including Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labour). We have also assessed UNICEF global data for countries where we operate and found no elevated risk in our own operations.

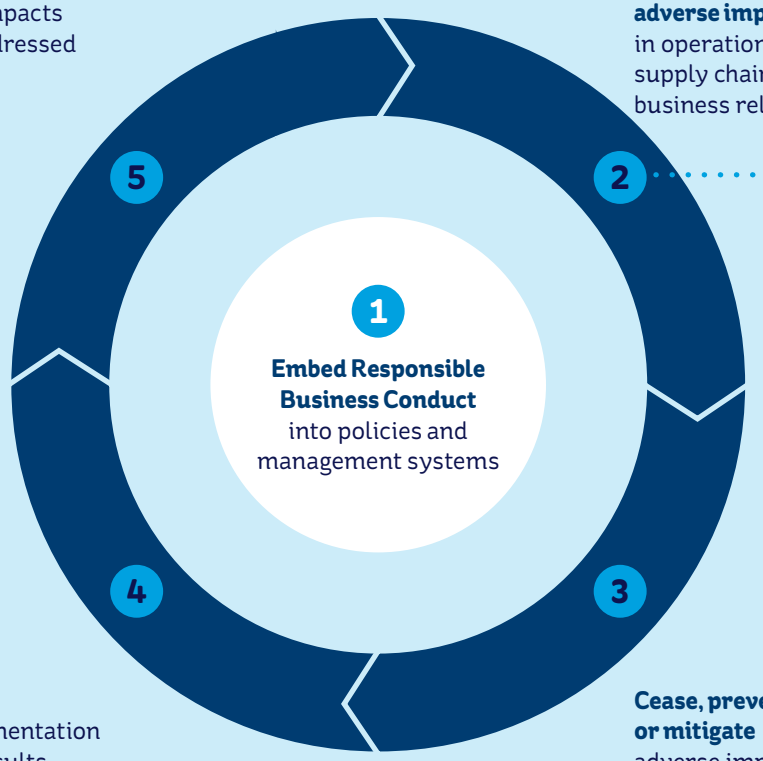
Approach to human rights

As outlined in our Human Rights Policy (see Policies on page 100), ESB is committed to respecting human rights, and to implementing and enforcing effective control measures in its operations, supply chain and in the communities and locations in which ESB operates to ensure human rights abuses are not taking place. This commitment is supported by a range of policies and by ESB's Code of Ethics ("Our Code") (see Policies on page 100).

During 2025, we continued the process of establishing a HRDD process across our business activities. HRDD is a structured process developed to help ESB to identify and manage any potential and actual adverse human rights impacts caused or associated with our business activities or linked to our activities through business relationships. Establishing a formal HRDD process across the organisation is a complex and ongoing process. We have assigned dedicated resources to lead, coordinate and provide governance for this work.

Our HRDD process is designed in line with UN Guiding Principles (UNGPs) and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. It incorporates six core components as illustrated below:

OECD Due Diligence Process and Supporting Measures



S1 Own workforce continued

Our framework for action continued

Safety, health and wellbeing approach

Safeguarding the health, safety and wellbeing of our colleagues, contractor partners and the public remains of primary importance for our organisation. These principles are embedded in every decision and action we take across the Group.

The Chief Executive has overall responsibility for the management of safety, health and wellbeing in ESB. ESB's Safety Statement sets out the overall policy and general arrangements in ensuring the safety, health and wellbeing of all employees. Functional responsibility is shared with all senior management and, in turn, with each manager, supervisor, team leader and employee. The Safety, Sustainability and Culture Committee supports the Board's monitoring and governance of health, safety and wellbeing. The committee meets regularly and assists the Board in fulfilling its oversight responsibilities by reviewing strategies, policies, programmes, risks, targets, and performance related to safety, health and wellbeing, the environment, and sustainability.

During 2025, we developed a new five-year Safety, Health and Wellbeing Strategy (2026–2030), themed 'Taking Care'. This theme reflects our commitment to fostering responsibility, empathy and proactive engagement, ensuring that everyone working for, or on behalf of ESB feels valued, supported and safe. The strategy is built on strong, proven foundations that emphasise resilience and continuous improvement. It is underpinned by the ISO 45001 certified Safety Management System (SMS), which ensures risks are consistently identified, assessed and managed. Robust assurance programmes and audits strengthen transparency and accountability, while ESB's long-standing ability to adapt to technological and regulatory change supports a culture of learning and readiness for future challenges. Aligned with our Driven to Make a Difference: Net Zero by 2040 Strategy, this new strategy reinforces our commitment to protecting our people (employees and contractors), our customers, the public and future generations.

This strategy was approved at a time of significant change for the organisation. ESB is experiencing a dynamic and increasingly diverse workforce, marked by high numbers of new joiners and a rapidly expanding contractor base. These shifts bring both fresh perspectives while also creating challenges around maintaining critical knowledge and corporate memory. Our culture continues to evolve as we embed new safety programmes and cultivate greater inclusivity and accountability. At the same time, we are responding to rising regulatory expectations, more complex and ambitious work programmes, including major capital investments, and an expanding risk profile as our operations and partnerships grow.

S1 Own workforce continued

Timeframe
S | Short term
M | Medium term
L | Long term

Value chain location
U | Upstream
O | Own operations
D | Downstream

Material impacts, risks and opportunities

Material impacts, risks and opportunities continued

We're committed to shaping a workplace where every colleague can thrive today and for the future. As part of our DMA, we have identified six IROs in our own operations related to our own workforce, which are listed in the table to the right. Further information on our materiality assessment methodology is provided in the Sustainability in Context chapter on pages 20–21.

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Key to IROs
Negative impact
Financial risk
Positive impact
Financial opportunity

Material IRO (S1-SBM-3)		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 9 Secure employment 10 Adequate wages				
36	**Positive impact on employees through provision of secure employment and adequate wages** – improving employees' wellbeing		S	O
Sustainability matters: 11 Health & safety				
37	**Positive impact on employees through implemented health & safety policies and provision of training** – providing employees with a safe working environment		S	O
38	**Financial risk through litigation** – caused by serious harm to the safety, health or wellbeing of employees or contractors resulting from operations		S	O
Sustainability matters: 12 Collective bargaining, including rate of workers covered by collective agreements				
39	**Positive impact on employees through participation in collective bargaining** – allowing employees' voices to be heard		S	O
Sustainability matters: 13 Training and skills development				
40	**Risk relating to resourcing/capability** – failing to secure the internal and external resourcing and capability required to deliver strategy		M	O
Sustainability matters: 14 Gender equality and equal pay for work of equal value				
41	**Negative impact through gender pay gap** – ESB currently has a GPG of 12.2% for 2025 (ROI employees)		S	O

S1 Own workforce continued

Material impacts, risks and opportunities continued

Managing these IROs

We've identified three positive impacts across the organisation that contribute to the overall well-being, health and safety of our workforce and their working environment. These include:

- The provision of secure employment and adequate wages
- The implementation of health and safety policies
- Additionally, our commitment to collective bargaining enables employees to have a meaningful voice in the workplace.

We identified one negative impact relating to gender equality and equal pay for work of equal value. In 2025, our mean GPG for ROI was reported at 12.2%, a 1.2% increase on 2024. When overtime and role-specific allowances are excluded, the mean GPG falls to 2.7%, a reduction of 0.3 percentage points from 2024. Find out more information under Metrics on pages 97–100 and under our Remuneration (gender pay gap) on page 99.

We have clear and measurable targets for gender (see Targets on page 88). Increasing the representation of women across the organisation and reducing the GPG are key goals of the People Strategy. Our initiatives include STEM programmes, inclusive hiring and "Pathways to Success" (a career development programme for women). These all support greater representation and a more diverse talent pipeline, which will help our net zero strategy succeed (see Actions on pages 89–96 for more information).

We've identified two key risks: the potential for financial liability due to health and safety incidents, and the challenge of securing the internal and external capabilities necessary to achieve our strategic objectives. We're proactively managing these risks through targeted programmes and strategic workforce planning initiatives. Find out more information under Targets on page 88 and Actions on pages 89–96.

S1 Own workforce continued

Engagement process

S1-2

At ESB, meaningful engagement with our workforce is essential to building a resilient, inclusive, and high-performing organisation. Our engagement approach ensures that the perspectives, experiences and needs of our employees inform decision-making and the management of actual and potential impacts. Effective engagement supports our ability to attract, develop, and retain a talented, motivated workforce that is central to delivering ESB's strategy and purpose.

We engage with our workforce through a variety of formal and informal mechanisms, including:

- Staff surveys
- Employee Resource Groups (ERGs)
- Employee Relations team
- One-to-one/team meetings
- Performance reviews/career development discussions
- ESB Employee All-Hands Webcast
- The Hub (ESB's information resource and employee communication platform)
- Online learning and training resources
- Engagement with trade unions
- Quarterly meetings between the Executive Committee and the Group of Unions.

We assess the effectiveness of all these engagement mechanisms through multiple channels, including the Our Voice survey, internal grievance mechanisms, and feedback from trade unions and ERGs. Through these efforts, we aim to foster a culture of openness, respect, and continuous improvement, ensuring that all members of our workforce feel heard, valued, and empowered to contribute to ESB's purpose and success.

Staff surveys

We conduct regular staff engagement surveys to understand employee experience, engagement, wellbeing, and culture. The surveys provide valuable insights that inform actions to enhance the employee experience and support the delivery of "Our People Promise". "Our People Promise" is an employee value proposition designed to ensure a positive, flexible environment where everyone feels safe, supported and able to grow.

In 2025, our employee engagement score remained strong at 7.5 out of 10. Employees also receive ongoing updates on culture, health and wellbeing, and resourcing and capability through The Hub, ESB's internal communication and information platform.

Employee Resource Groups (ERGs)

To strengthen inclusion and engagement, we have four ERGs focused on:

- Gender
- LGBT+
- Accessibility
- Cultural Diversity & Ethnicity.

These voluntary, employee-led groups provide a platform for sharing experiences, raising concerns, and shaping initiatives that promote equity and belonging at ESB.

Engagement with trade unions

We respect the right of employees to join a trade union and we engage in collective bargaining with several accredited trade unions through the ESB Group of Unions. This engagement ensures employee voices are represented in key decisions affecting working conditions, employment terms, organisational changes, and employee rights.

S1 Own workforce continued

Engagement process continued

Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-3

We're committed to maintaining a culture of openness, integrity and accountability. We provide multiple channels for our workforce to raise concerns related to potential wrongdoing, negative impacts or inappropriate conduct.

Employees can raise concerns through:

- Their line manager or another senior manager
- The Human Resources team
- Direct escalation to the Group Internal Auditor or Company Secretary
- A confidential, independently managed 24/7 helpline and web reporting service, by a third-party provider, which operates 24 hours a day, seven days a week
- External reporting in accordance with the provisions of the Protected Disclosures Act.

The Group Internal Audit (GIA) function oversees the confidential helpline and web service. All reports are reviewed quarterly to assess potential human rights impacts and ensure appropriate follow-up.

Grievance procedures

We operate internal grievance procedures, supported by the Industrial Council, to ensure fair and transparent resolution of workplace issues. Employees can raise concerns relating to:

- Employment terms
- Health and safety
- Working practices
- The work environment.

All grievances are acknowledged and handled in line with defined timelines, with the right to appeal decisions. This framework enables effective remediation of negative impacts and supports an environment of trust and accountability. Our Whistleblowing and Protected Disclosures Policy (see Policies on page 100 for more information) outlines the procedures for reporting suspected wrongdoing. All reported wrongdoings are treated confidentially and handled in accordance with legal obligations.

S1 Own workforce continued

Targets

S1-5

We've established a series of clear, measurable targets to manage and mitigate the IROs identified through our DMA. These targets support continuous improvement and drive accountability across the organisation. They're underpinned by robust KPIs and monitored through a range of feedback mechanisms, including the Our Voice employee survey, grievance channels, internal reporting systems, and engagement with trade unions.

This structured approach ensures alignment with ESB's broader People Strategy, the Driven to Make a Difference: Net Zero by 2040 Strategy, and our commitments to the United Nations SDGs (see page 17).

We're continuing to review whether additional targets are needed to strengthen the management of material IROs.

Annual targets

Target	Focus area	2025 targets	Target type	Target	2025 progress
T 1	Good Catch Reporting	A Good Catch is where an employee or contractor intervenes when they notice an unsafe act or unsafe condition Annual target of 11,400 Good Catch reports	Annual	11,400	11,423
T 2	P1 On-Time Investigation Closures	The P1 investigation closure KPI reports on the on-time completion of investigations into incidents which have the potential to cause life-changing injuries. Target 80% on-time closures in each calendar month	Monthly	80%	*82%
T 3	P1 On-Time Action Closures	The P1 action closure tracks the timely completion of all actions associated with P1 incidents Target 80% completion in each calendar month	Monthly	80%	*86%
T 4	Senior Management Leadership Activities/Audits	All senior managers in ESB are expected to demonstrate their safety leadership by conducting leadership activities each month. This target tracks completion of these activities	Monthly	80%	*79%

2030 targets

Target	Focus area	Target	Target	Target year	2025 progress	Baseline
T 1	Employee Engagement	Our Voice score relating to engagement increase score to over 8/10	8 out of 10	2030	7.5 out of 10	7 out of 10 (2021)
T 2	Female Representation	30% of the workforce to be female by 2030	30%	2030	27%	26.7% (2024)

* These are average rates per month.

S1 Own workforce continued

Actions

S1-4

We've implemented a range of proactive measures to enhance working conditions and strengthen workforce wellbeing across our operations. These actions directly address the material IROs identified in our DMA. They support secure employment, competitive wages, robust health and safety practices, an inclusive culture and meaningful employee representation.

By linking actions to specific IROs, we ensure a structured and transparent approach to managing workforce-related impacts while supporting long-term strategic delivery. The following tables outline both the actions taken and the planned actions to reinforce positive impacts across the organisation, and to mitigate financial risks arising from potential litigation related to serious harm to the safety, health or wellbeing of employees or contractors, resulting from operations.

IRO		Key actions taken
36	**Positive impact on employees through provision of secure employment and adequate wages** – improving employees' wellbeing	We continue to maintain high levels of permanent and full-time employment, with 90% of employees on permanent contracts in 2025. Our workforce grew to over 10,000 in 2025, reflecting the increased capability required to deliver our Net Zero by 2040 Strategy.
		Our reward offering includes a competitive pension scheme, health and wellbeing supports, family-friendly policies, and flexible working arrangements. Our hybrid working model, based on trust and flexibility, supports talent attraction and retention.
		We comply with all statutory wage requirements, and ESB follows an industry best-practice approach to benchmarking. A new three-year pay agreement was reached in 2025, covering approximately 6,200 employees.
		Employee turnover remained low at 6%, supporting continuity and organisational resilience.
37	**Positive impact on employees through implemented health & safety policies and provision of training** – providing employees with a safe working environment	We implement robust health and safety policies and practices through initiatives like Good Catch Reporting, P1 Investigation Closure, P1 Action Closure, Senior Management Leadership Activities and Audit Non-Conformity Closure. These initiatives foster a shared responsibility for safety and ensure all incidents are identified, reported and dealt with efficiently and quickly.
		ESB offers comprehensive safety and health training programmes. In line with our Health, Safety and Wellbeing Policy (see Policies, page 100), training is tailored to reflect varying levels of responsibility, ability, language proficiency, literacy, and risk, ensuring that all staff are equipped to work safely and confidently.
		In June 2025, we introduced Synergi Life, a new Environmental, Health and Safety (EHS) platform. This system streamlines incident reporting and audit processes, providing enhanced functionality and improved accessibility for employees across the organisation.
		Monitoring the Lost Time Injuries (LTIs) rates is a key area of focus, and we continue to invest in initiatives that enhance workplace safety. LTIs are work-related incidents resulting in at least one day of absence, excluding the day of occurrence. In 2025, we recorded 55 LTIs relating to employees only.

S1 Own workforce continued

Actions continued

Audit non-conformity closures

ESB is certified to externally accredited SMS. Non-conformities associated with external audits of these SMS are tracked for on-time completion. All actions were completed on time in 2025, and ESB was recommended for continued accreditation to the International IS0 45001 standard by its independent external auditors.

Key initiatives and programmes implemented or continued in 2025

- ESB continues to invest in initiatives to reduce the risk of injury to its employees and contractors
- 'Good Catch' proactive interventions encourage everyone to take responsibility for health, safety and wellbeing across ESB
- Centres of Competence provide leadership and direction to manage key safety and wellbeing risks
- The Fire Safety working group developed robust fire safety protocols, including fire hazard prevention, standardised evacuation procedures, training in extinguisher use and routine fire panel testing for system reliability across all sites
- Principal risks and their management are reviewed and reported quarterly to the Group Risk Manager and the Audit and Risk Committee
- The Competence and Assurance team continue to expand work activities covering all ESB Networks' work programme activities.

IRO		Key actions taken
37	Continued from previous page **Positive impact on employees through implemented health & safety policies and provision of training** – providing employees with a safe working environment	ESB's business units maintained their SMS certification to ISO45001 standard in 2025. This certification reflects ESB's commitment to the highest standards of occupational health and safety management. It provides a structured framework to identify, manage, and reduce workplace risks, ensuring the safety, health and wellbeing of ESB's people. By implementing ISO45001, ESB demonstrates compliance with legal requirements and fosters a proactive safety culture.
39	**Positive impact on employees through participation in collective bargaining** – allowing employees' voices to be heard	We engage in collective bargaining with numerous accredited trade unions through the ESB Group of Unions, e.g. implementing agreements on pay, expenses, annual leave etc in 2025. As an equal opportunity employer, ESB respects employees' rights to union membership and representation.
		Our internal grievance process includes an Industrial Council comprising management and employee representatives, chaired by an independent external party.

S1 Own workforce continued

Actions continued

IRO		Key actions taken
38	**Financial risk through litigation** – caused by serious harm to the safety, health or wellbeing of employees or contractors resulting from operations	We continue to use the self-developed 'Safe and Sound', a safety and wellbeing culture transformation programme that centres around our core values: caring for one's own safety and wellbeing and that of their colleagues; being courageous in speaking up when we see something unsafe; being trusted by employees, contracted partners and customers to be safe every day; and being driven to be leaders in safety, health and wellbeing and environmental responsibility. In 2025, employees from across our organisation took part in leadership skills and culture development programmes. The Safety Culture team developed safety engagement training modules, to partner with employees and contractors and influence positive safety behaviours on site. 'Safe and Sound' has been reinforced through strong and visible leadership and the development of a series of safety improvements since 2020. Internal capabilities have been built through the Safety, Culture and Leadership Coaches to ensure a sustained cultural journey, maintain and grow leadership teams and build on current foundations.
		Our Health and Wellbeing team delivers proactive, preventative, and early intervention services to promote physical and mental wellbeing and the development of healthy and sustainable habits. We also provide leadership and are strategic in managing key safety and wellbeing risks through our centres of competence, ensuring consistent standards and expert guidance across the organisation.
		All ESB business units operate formal Health & Safety Management Systems, which are externally certified to the ISO 45001 Standard. These systems provide a structured framework for managing health and safety risks across the organisation.
		'Good Catch' is a proactive safety, health, and wellbeing initiative that empowers everyone across ESB to take ownership. By identifying and acting on potential risks before they become incidents, we create a safer, healthier workplace, together.
		ESB has a range of wellbeing supports in place, including: • Health & Wellbeing programmes and monthly webinars promoting healthy and sustainable habits • A network of volunteer Wellbeing Champions, who support local wellbeing initiatives • The Employee Assistance Programme, a Mental Health First Aid network, and a 24/7 Counselling service to support mental health and wellbeing • Sports and social clubs that promote physical activity and social connection.

S1 Own workforce continued

Actions continued

IRO		Key actions taken	Future actions
41	**Negative impact through gender pay gap** – ESB currently has a GPG of 12.2% for 2025 (ROI employees)	Recruitment policies were reviewed and partnerships strengthened with organisations including Open Movement. These partnerships ensure that our talent pipelines are open and accessible to all, supporting broader workforce diversity. We've implemented a parenting transition programme, an evidence-based, award-winning coaching programme designed to support smooth and successful transitions for all new parents, regardless of their path to parenthood. We launched a Menopause Support Programme to support wellbeing across life stages. In 2025, we expanded our menopause support with new webinars on Fertility and on Menopause for Neurodivergent People, hosted three successful and highly engaged Menopause Cafés across our locations and, in October, launched the Menopause Framework, which was a major milestone in our commitment to raising awareness and providing meaningful support around menopause and perimenopause. In collaboration with TU Dublin, we established TrailblazHER, an initiative which promotes gender equality for women in education and careers (see Case Study on page 95). Our four Employee Resource Groups (Accessibility, Cultural Diversity and Ethnicity, Gender, and LGBT+) continued to provide safe spaces, represent employee voices, and inform DEI Strategy. These voluntary, employee-led groups play a vital role in fostering inclusion, facilitating awareness training, marking key dates, and providing input to ESB's DEI Strategy. Reflecting our progress, in 2025, ESB achieved Silver Accreditation from the Irish Centre for Diversity. This accreditation affirms that ESB has embedded inclusive practices and a culture of fairness and belonging. The 2025 'Equality Score' from ESB's annual employee engagement survey increased steadily to 8.3, up from 8.2 in 2024 and 8.0 in 2022. ESB Networks established a targeted Apprenticeship Programme to drive greater inclusion in craft electrical roles. Key actions of the programme include inclusive recruitment practices, outreach to schools and career counsellors, mentorship networks, and regular feedback sessions. As a result, female participation increased incrementally from 0% in 2016 to 26% in 2025. ESB Networks now leads the sector in female representation in craft electrical roles.	In 2026, we'll continue to grow the Women in Tech@ESB initiative, which supports our commitment to closing the GPG by addressing gender disparities in technology roles. By promoting role models, fostering peer support, and driving advocacy, the programme aims to inspire more women to pursue and thrive in tech careers while also cultivating a more inclusive and equitable tech community within ESB. To increase female participation in apprenticeships, graduate programmes, and engineering roles, we're focused on building the talent pipeline through initiatives like the STEM Teacher Internship Programme and encouraging women at ESB to act as visible role models.

Continued on next page

S1 Own workforce continued

Actions continued

IRO		Key actions taken	Future actions
	Continued from previous page	In 2025, women represent 35% of ESB's top management, compared to 65% men. To help close this gap, we have completed a pilot career development initiative called 'Pathways to Success'. This initiative, designed by women for women, equips participants with the tools for long-term career success at ESB. Piloted in 2024 and then formally launched in January 2025, the programme has received overwhelmingly positive feedback by welcoming over 120 participants and achieving a 99% Net Promoter Score. Participants reported increased confidence, empowerment to explore career opportunities, and value from shared experiences. Due to high demand, we plan to expand the programme in 2026 and double the number of programmes delivered. Our partnership with AHEAD's WAM programme has placed over 180 graduates with disabilities since 2006. In 2025, we received the Disability Inclusion Award at the Diversity in Tech Awards and the WAM Leader Award from AHEAD. Employees with disabilities were offered Copilot 365 licences as assistive technology, Disability Awareness training was delivered to customer-facing staff, and Irish Sign Language (ISL) training (QQI Level 3) was launched. NIE Networks has become the first company in the UK to earn Investors in People Platinum accreditation across all three assessed areas. This follows its Platinum accreditation last year, the Platinum award for Apprentices, and most recently, the Wellbeing accreditation in October. The "We invest in Wellbeing" Platinum award is the highest recognition of NIE Networks' commitment to creating a supportive, valued and thriving workplace. A rigorous, independent assessment of its behaviours, practices and processes confirmed the company had achieved the top standard. We've made targeted efforts to recruit more women and individuals from underrepresented groups into traditionally non-diverse roles. We introduced the 'Inclusion Principle' for representation at the interview stage: 40% male, 40% female, and 20% open to any gender identity to ensure broader inclusivity. When overtime is excluded, the pay gap reduces to 2.7%, indicating that the overall gap is largely driven by overtime and storm-related activity. We are making good progress in narrowing the gap in the areas within our control. See more information under Metrics on page 97.	

S1 Own workforce continued

Actions continued

We recognise the risk that we may face challenges in attracting, developing, and retaining the capabilities needed to deliver on our business strategy, e.g. commercial and digital skills. We look to a diverse workforce, including outsourcing partners, to ensure we have diverse skills.
To mitigate this risk, we're committed to building a future-ready workforce through a sustainable and inclusive approach to talent development. This is underpinned by our People Strategy and Talent Management Framework outlined in the table to the right the actions taken and future actions.

IRO		Key actions taken	Future actions
40	**Risk relating to resourcing/ capability** – failing to secure the internal and external resourcing and capability required to deliver strategy	ESB continues to build future-focused, sustainable skills through @MyDevelopment, leadership programmes, mentoring, coaching, innovation challenges, rotations and professional-qualification support. These initiatives help colleagues grow and support ESB's clean-energy ambition. Since 2020, ESB has trained 251 coaches and mentors, earning the EMCC Global Coaching Award (2023) and the Best People Development in Engineering Award (2025). Hybrid working remains embedded across the organisation and continues to exceed the Government's Climate Action Plan 2023 remote-working targets. ESB's Talent Management Strategy supports attraction, development and retention. A total-workforce resourcing model is in place to ensure capability and capacity align with strategic delivery needs. Leadership development remains a priority as ESB embeds a coaching-led culture. In 2025, the 'Leading Through Our Values' programme engaged around 1,400 managers, with a new 'Leading Through Our Behaviours' programme planned for 2026 to further strengthen behavioural leadership and support an inclusive, high-performing organisation. ESB maintains strategic focus on future workforce trends. Anticipating and preparing for future capability needs is essential to ESB's long-term success. In 2025, the People function worked with business units to identify the critical skills required to support the net-zero transition. These insights will guide ESB's long-term strategic workforce plans, ensuring the right talent is in place at the right time. An Offshore Wind and Hydrogen Capability Action Plan is in place. In 2025, the Offshore Wind Capability Development Plan delivered strong results, strengthening EMP's team capability ahead of offshore portfolio expansion. ESB's Early Careers Strategy continues to strengthen its pipeline of emerging talent. In 2025, ESB welcomed record numbers to its Graduate Programme and recruited over 150 new apprentices into the ESB Networks Craft Apprenticeship Programme. By inspiring and enabling the next generation – particularly in STEM and technical disciplines – ESB is building the critical capabilities needed for Ireland's clean energy future.	Over the next five years, we aim to recruit people across a range of capabilities, with a strategic focus on increasing workforce diversity. ESB Networks' Training Centre in Portlaoise will continue to be the centre of excellence in providing technical training and will expand capacity to meet the increased requirements for training and onboarding of ESB Networks' technicians and apprentices.

S1 Own workforce continued

Actions continued

CASE STUDY

Employee Resource Groups (ERGs) – driving inclusion, engagement, and innovation at ESB

IROs
See page 84 41

The context
Employee Resource Groups (ERGs) are voluntary, employee-led groups at ESB. They bring together individuals with shared lived experiences or demographics – and their allies – to amplify employee voice, foster inclusion, and drive positive organisational change.

What we did
A new ERG operating model was implemented in June 2025. This model ensures key roles within the ERGs are filled and membership numbers are maintained. This ensures the efficiency and effectiveness of each of the ERGs. Current ERGs include Accessibility (est. 2023), Cultural Diversity & Ethnicity (est. 2023), Gender (est. 2023), and LGBT+ (est. 2016, BeMe@ESB). Each ERG is sponsored by a member of the Executive team, ensuring visibility and strategic alignment. Each group is co-led by employees from across the business, reflecting ESB's commitment to shared leadership and diverse perspectives, and are sponsored by a member of the Executive team, ensuring visibility and strategic alignment.

The impact
All ERGs have seen strong engagement, with hundreds of employees participating in events, campaigns, and discussions. Quarterly ERG Newsletters highlight vibrant activities, including Pride celebrations, cultural events, accessibility workshops, and allyship campaigns.

What we're doing next
The Board reaffirmed its commitment to diversity, equity, and inclusion, recognising ERGs as central to ESB's People Strategy and long-term success.

ERGs enhance representation, visibility, and innovation, serving as sounding boards for strategy and helping to attract, retain, and progress diverse talent. They contribute to a more inclusive work environment, higher engagement and morale, and increased diversity of thought.

TrailblazHER

IROs
See page 84 41

In 2025, the Energy For Generations fund supported 47 projects and maintained two key strategic partnerships: TrailblazHER, a TU Dublin initiative advancing gender equality in sectors where women are underrepresented, and the EPIC programme by Business in the Community (BITC) Ireland, which helps refugees and migrants access employment opportunities.

Beyond financial support, ESB employees actively contributed to these partnerships by participating in mock interviews for EPIC students, hosting the EPIC annual graduation, engaging in the TrailblazHER MentorHER programme, and sponsoring the TU Dublin TrailblazHER Sustainability Award. Additionally, EFG provided Christmas funding to 24 charities, including the Capuchin Day Centre, Barnardos, Depaul, Cork Penny Dinners, Focus Ireland, and ISPCC. Through these diverse initiatives, the fund continues to strengthen and build resilient communities across Ireland.

S1 Own workforce continued

Actions continued

CASE STUDY

The Sustainability Navigator Programme – igniting a movement for net zero

IROs
See page 84 40

The context
As part of a wider culture shift around sustainability in ESB, driven by our Net Zero 2040 Strategy, there was an opportunity to create an internal training programme that focused on key sustainability topics. The Navigator programme was devised so anyone in ESB could apply, with an expectation that people who complete the course, AKA 'Navigators', will be empowered to share their knowledge among their team/colleagues, promote sustainability initiatives in their area and accelerate progress across ESB.

What we did
The Sustainability Navigator Programme was set up to help transform ESB from the inside out by empowering staff with more sustainability knowledge. Launched as part of the Sustainability Transformation Enablement Programme (STEP), this flagship initiative is building a dynamic network of sustainability champions who are driving change across the organisation.

Participants complete 40–50 hours of learning across six modules, covering everything from climate action and biodiversity to circular economy and sustainable supply chains. The curriculum blends expert-led workshops, site visits, peer learning, and real-world projects, with prestigious external Lantra certification as a mark of excellence in sustainability leadership.

The impact
Since its inception in 2024, 70 participants have graduated from the programme. Navigators represent many business units, ensuring sustainability is championed at every level and location.

Navigators act as local sustainability leaders, sparking conversations, challenging the status quo, and embedding sustainability into daily decisions. This distributed model means sustainability is not just a top-down directive; it's a grassroots movement, owned and energised by staff. Navigators are required to share their learning with at least 10 colleagues after each session, but many go beyond, running team sessions, leading green initiatives, and mentoring peers. Over 3,500 employees have attended briefings, workshops, or events led by Navigators – amplifying the programme's reach and multiplying its impact.

Graduates have spearheaded projects in biodiversity, carbon reduction, circular economy, and sustainable procurement – delivering measurable progress towards ESB's Net Zero 2040 Strategy.

What we're doing next
Following the success of the Sustainability Navigator Programme since its inception in 2024, it is set to continue with a new intake of prospective 'Navigators' in 2026.

At present, there is a strategic review underway to identify areas where the programme could be refined and improved. This review involves liaising with ESB's Sustainability Managers across five business units, the Centre of Sustainability's four Topic Leads (Climate Change; Biodiversity; Circular Economy; People-Centred), and interviews with previous staff members who have completed the programme, as well as others who were unable to complete, to get their feedback.

S1 Own workforce continued

Metrics

We monitor a range of key workforce metrics that support the effective management of material IROs identified in the DMA. These metrics cover the characteristics of ESB's employees, collective bargaining coverage, diversity and inclusion indicators, adequate wages, health and safety performance, remuneration, incidents of discrimination and other human rights incidents. Monitoring these indicators enables ESB to assess the effectiveness of its workforce-related policies, actions and targets, and to identify areas requiring further improvement.

In the line of requirements of the CSRD, and ESRS S1, this section reports only the metrics that are required for disclosure and directly link to the material outcomes of our DMA. All metrics provided in this section are reported at group level and reflect ESB employees only, unless otherwise stated.

Characteristics of undertaking employees

S1-6

ESB reports employee metrics based on headcount as at 31 December 2025. The data includes all individuals employed on permanent or temporary contracts across the Group. In line with national legislation and practice, ESB defines an employee as an individual in an employment relationship with the organisation.

Permanent employees are defined as those engaged under contracts of indefinite duration, with no specified end date. Temporary employees are defined as those engaged under fixed-term contracts, which conclude on a defined date, upon completion of a specific task, or following the occurrence of a particular event. Temporary employees include apprentices, trainees, graduates, and individuals engaged in project-based roles.

Table 1: **Employee headcount by gender at group level**

A	Female	2,739
B	Male	7,387
	Total Employees	10,126

Table 2: **Employee headcount by country at group level**

A	Republic of Ireland	7,805
B	United Kingdom	2,277
C	Other	44
	Total Employees	10,126

S1 Own workforce continued

Metrics continued

We define employee turnover as the total number of ESB employees who exited the organisation during the reporting period, and the corresponding employee turnover rate in that reporting period.

Employee turnover is calculated as the aggregate number of ESB employees who left the organisation voluntarily or due to dismissal, retirement, or death in service during the reporting period. This figure forms the numerator of the employee turnover rate. We use the closing headcount as at the end of the reporting period as the denominator. Undergraduate placements and apprentices are excluded from the leavers figure.

Table 3: **Employee headcount by contract type at group level**

	Female	Male	Total
Number of employees	2,739	7,387	**10,126**
Number of permanent employees	2,463	6,641	**9,104**
Number of temporary employees	276	746	**1,022**
Number of non-guaranteed hours employees [1]	–	–	**-**

1 No employees within ESB are employed on a non-guaranteed hours basis.

Table 4: **Employee turnover at group level**

	2025
Total leavers	**594**
Employee Turnover %	**6%**

Collective bargaining

S1-8

We define collective bargaining as the process through which the organisation engages with representatives of ESB's Group of Unions to negotiate and agree on matters relating to pay and other terms and conditions of employment. This process is a key component of ESB's employee relations framework and reflects the organisation's commitment to constructive engagement with employee representatives.

Table 5: **Collective bargaining coverage and social dialogue**

In 2025, 86% of the Group's total employees within the European Economic Area (EEA) were covered by collective bargaining agreements. This figure excludes employees in non-EEA countries.

Collective bargaining coverage		Social dialogue
Coverage rate	Employees (EEA)	Workplace representation (EEA)
0–19%		
20–39%		
40–59%		
60–79%		
80–100%	ROI	ROI

Diversity

S1-9

The table below provide a summary of the gender distribution at top management level during the reporting period.

For reporting purposes, top management is defined as employees at senior management grades, excluding the Executive Committee in the Republic of Ireland. In the United Kingdom, top management includes certain senior managers based on role designation.

We have clear and measurable targets for gender (as disclosed in the Targets section on page 88). In 2025, women comprised 27% of the workforce, with a dedicated STEM Strategy Project Manager advancing progress towards the 30% target (including NIE Networks and So Energy) by 2030.

Senior management female percentage is calculated by including all female employees in ESB's total senior management as a % of total senior management as at 31st December 2025.

Table 6: **Gender distribution top management level at group level 2025**

Gender	Total	Percentage
Male	231	65%
Female	124	35%
Total	**355**	**100%**

S1 Own workforce continued

Metrics continued

Adequate wages

S1-10

In 2025, all ESB employees were paid an adequate wage. The adequate wage benchmark used for comparison is the National Minimum Wage in the Republic of Ireland and the UK.

Health and safety

S1-14

Table 7 summarises key health and safety indicators for the reporting period, including employee coverage under safety systems, fatalities and recordable work-related accidents.

Table 7: **Health and safety at group level 2025**

	2025
Percentage of ESB employees who are covered by the Health & Safety Management System based on legal requirements and (or) recognised standards or guidelines	100%
Number of ESB employee fatalities as a result of work-related injuries and work-related ill health	0
Number of recordable work-related accidents (ESB employees)[1]	55

1 Work-related accident that results in an LTI, where one working day or more is lost after the injury.

Remuneration (gender pay gap)

S1-16

The GPG table presents GPG metrics for staff in the Republic of Ireland and NIE Networks and SO Energy in the UK. The GPG is defined as the difference in average pay between female and male employees, expressed as a percentage of the average male pay.

The mean GPG (ROI) in 2025 was 12.2%, an increase of 1.2 percentage points compared to 2024. Excluding overtime and role-specific allowances, the gap narrowed to 2.7%, a 0.3 percentage point improvement. The primary driver remains lower female representation in STEM roles, which attract more overtime and allowances.

The impact of Storm Éowyn, which led to an increase in overtime (and 98% of Network Technician roles are held by men), contributed to the increase. Despite this, the overall trend since 2021 is positive, with women's representation rising year on year.

In 2025, women held 35% of senior management roles, 40% of the Executive Committee, and 42% of Board positions. ESB remains committed to transparency and action on the GPG. Increasing the representation of women across ESB and reducing the GPG are key goals of the People Strategy.

Read more
For more information read our Gender Pay Gap Report here

Table 8: **Gender pay gap**

GPG Reporting	ROI (including overtime)[1]		ROI (excluding overtime)[1]		NIE Networks[2]		So Energy[3]	
	2025	2024	2025	2024	2025	2024	2025	2024
Mean GPG	12.2%	11.0%	2.7%	3.0%	1.8%	6.2%	15.7%	14.5%
Median GPG	11.5%	10.6%	0.9%	0.3%	-1.3%	1.2%	10.4%	0.3%

1 Reflects the requirements of Irish Gender Pay Gap Information Act, 2021 (and covers the 12-month reporting period ending 30 June). ESB's GPG report in full can be found on ESB's website.

2 While UK GPG requirements have been in place since 2017, there is currently no legal requirement in Northern Ireland to report on this. Calculations are based on full pay relevant employees as at the pay period that includes the snapshot date of 5 April. In addition to the above, the mean bonus GPG is -10.7% (2024: 11.4%) and median bonus GPG is -40.8% (2024: -7.1%).

3 Reflects the requirements of The Equality Action (Gender Pay Gap Information) Regulations 2017 (and covers the pay period that includes the snapshot date of 5 April). In addition to the above, the mean bonus GPG is 20.2% (2024: 22%) and median bonus GPG is 18.8% (2024: 16%).

Note: GPG reporting for ESB's other UK employees (i.e. excluding NIE Networks and So Energy) is not currently completed as ESB does not meet the 250-employee threshold on the snapshot date.

S1 Own workforce continued

Metrics continued

Discrimination & other human rights incidents

S1-17

This metric encompasses all substantiated records and complaints brought to the attention of the Employee Relations department during the full year 2025. Employees can lodge formal complaints through the company's Grievance Procedure. All allegations of discrimination and human rights incidents are fully investigated by the company, and appropriate actions are taken where required.

Table 9: **Discrimination & other human rights incidents**

	2025
Number of incidents of discrimination (Including harassment)	0
Number of human rights incidents connected to its own workforce (excluding discrimination above)	0
Amount of fines, penalties, and compensation for damages, incidents of discrimination and other human rights incidents (EUR)	0

Policies

S1-1

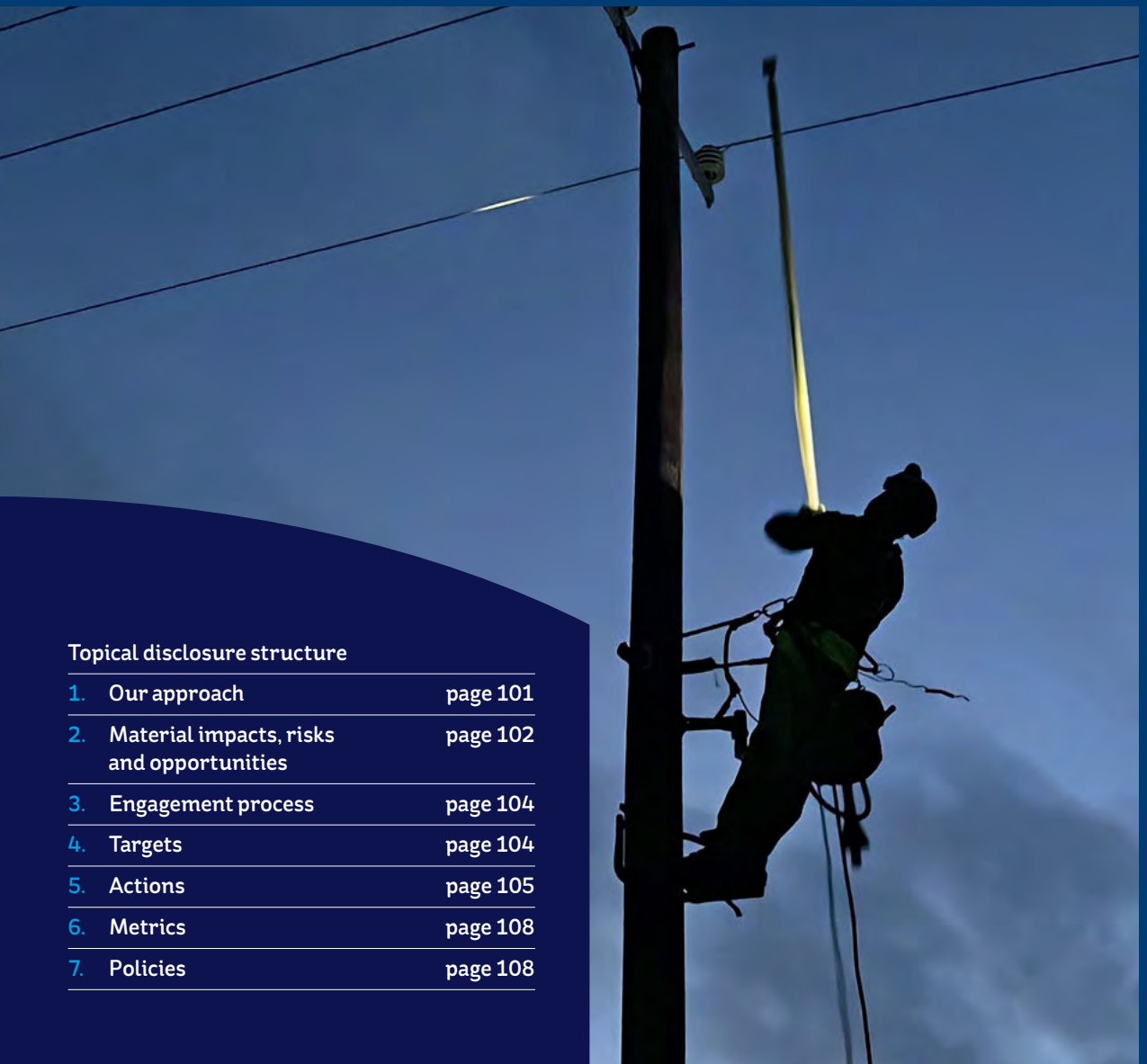
ESB has implemented a comprehensive suite of policies to manage IROs related to our own workforce. These include:

Policies	Where publicly available
ESB Code of Conduct for Staff (Our Code)	here
ESB Group Policy on Human Rights	here
Modern Slavery Policy	here
Health, Safety and Wellbeing Policy	here
Accessibility and Reasonable Accommodations Policy	here
ESB Whistleblowing and Protected Disclosures Policy	here
Gender Identity and Expression Policy	here
Respect and Dignity for the Individual Policy	here
ESB Group Environment and Sustainability Policy	here

These policies apply to all ESB's own workforce and are made available through the ESB Hub (ESB's information resource and employee communication platform) and the Employee Handbook. Mandatory annual training is provided on Our Code and other key policies. Managers and supervisors are responsible for ensuring policy awareness and compliance, supported by trade unions and employee representatives.

Together, these policies form a robust framework for managing own workforce-related impacts, risks and opportunities, supporting ESB's long-term sustainability and performance.

S2 Workers in the value chain



Topical disclosure structure

Why this matters

As reliance on global supply chains grows, ESB recognises its responsibility to promote high labour, human rights and ethical standards beyond its direct operations.

Our supply chain plays a critical role in delivering the infrastructure, technologies and services required for the net zero transition. As investment accelerates, ESB increasingly relies on global supply chains for materials, equipment and specialist services, many of which carry environmental, social and ethical risks. How these risks are managed is fundamental to delivery resilience, security of supply, value chain emissions management, long-term value creation and ultimately delivery of our Net Zero by 2040 Strategy.

Within ESB's Sustainability Leadership Plan, supply chain sustainability sits under the People pillar, reflecting our responsibility to promote high standards of labour practices, human rights, environmental performance and ethical conduct beyond our direct operations. Responsible procurement and supplier engagement support ESB's Net Zero by 2040 strategy by reducing exposure to supply disruptions, supporting cost stability and quality assurance, and contributing to a just and responsible energy transition.

Our approach

Our approach is built on clear expectations, responsible procurement and active engagement with suppliers, contractors, partners and joint ventures. Through our Code of Ethics, Supplier Charter and Requirements for Third Parties Policy, we set transparent standards for lawful, ethical and respectful conduct across the value chain, embedding human rights, anti-slavery, employment law and ethical business requirements into procurement and contracting processes. We also participate in sector initiatives to strengthen labour standards and transparency in high- impact value chains, undertake risk assessments and supplier compliance checks, and apply governance frameworks to joint ventures. Confidential whistleblowing and Protected Disclosures channels support accountability and continuous improvement across our value chain.

This topic is addressed within ESB's developing People-Centred Sustainability strategic roadmap, which provides an integrated framework for managing social impacts across our value chain.

S2 Workers in the value chain continued

Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

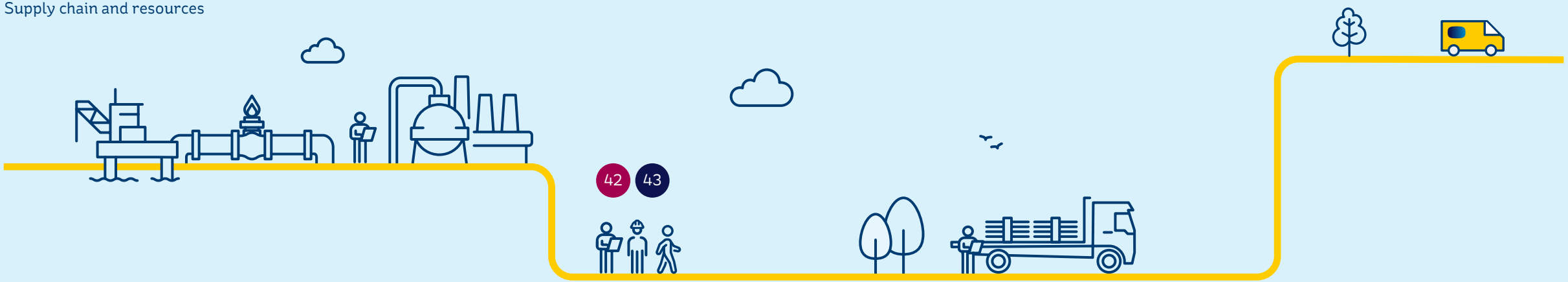
Timeframe
- S Short term
- M Medium term
- L Long term

Value chain location
- U Upstream
- O Own operations
- D Downstream

Material impacts, risks and opportunities

Upstream

Supply chain and resources



Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Material IRO (S2-SBM-3)		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 15 Working conditions 16 Other work-related rights				
42	**Negative impact on value chain workers** – owing to countries where suppliers or supplier of partners are/may be based and where labour laws may not protect workers and their working conditions		S	U
43	**Reputational risk** – if using suppliers or engaging with partners with poor compliance on labour laws, working conditions and human rights or those engaging in unethical business conduct		M	U

S2 Workers in the value chain continued

Material impacts, risks and opportunities continued

We rely on a wide network of contractors, subcontractors, suppliers and other value chain workers who contribute to the delivery of our services and strategic objectives. As part of our DMA, we identified two material IROs relating to the working conditions, rights and wellbeing of our value chain workers. These relate to the potential adverse impacts on workers within global or higher-risk supply chains, and the reputational and compliance risks to ESB arising from labour practices within partner and supplier organisations.

Further information on our materiality assessment methodology is provided in the Sustainability in Context chapter on pages 20–21.

How we manage the IROs

A material negative impact was identified regarding workers employed by suppliers or partners located in countries where labour laws may not adequately protect workers or their working conditions. This may expose workers in ESB's value chain to risks associated with weaker regulation and oversight. To help mitigate these impacts, we embed human rights, ethical conduct and labour practice expectations within our procurement and governance processes. All suppliers providing goods, services or works to ESB and/or on behalf of ESB are required to:

- act honestly and ethically
- comply with all applicable laws
- respect internationally recognised human rights
- meet ESB's standards on employment practices, anti-slavery and human trafficking, and ethical conduct.

These expectations are set out clearly in ESB's Supplier Charter and ESB's Requirements for Third Parties Policy (see Policies on page 108 for more information). We also participate in industry initiatives, including the Bettercoal Colombia Working Group (although we ceased burning coal in 2025, we remain members and continue to influence improved practices), Solar Stewardship Initiative (SSI), and RECOSI Gas Programme, to help drive responsible sourcing and contribute to better working conditions in producer countries and manufacturing hubs (see Actions on pages 105–108 for more information).

A material reputational risk was identified relating to the potential for ESB to be associated with suppliers or partners that fail to meet labour, human rights or ethical business standards. Non- compliance in supplier operations, including breaches of employment law, unsafe working conditions, unethical conduct, modern slavery, or failures of due diligence, may result in significant reputational, legal or operational consequences.

To manage this risk, we apply a comprehensive governance and due diligence approach, which includes:

- mandatory contractual requirements covering employment law, anti-slavery and anti-trafficking, ethical conduct, sanctions and anti-bribery and corruption
- supplier screening, pre-qualification checks and risk-based HRDD
- supplier audits, compliance checks and follow-up on areas of concern
- governance frameworks for joint ventures to ensure alignment with ESB standards
- confidential whistleblowing and Protected Disclosures channels through which concerns may be raised by any worker, including those within ESB's value chain.

For more information on how concerns are investigated to help strengthen our overall approach to responsible business conduct, please read our Business Conduct section on pages 133–138.

S2 Workers in the value chain continued

Engagement process

We have an engagement process in place to identify, assess, and respond to actual and potential impacts on workers in the value chain. This process includes mechanisms for gathering insights, engaging with suppliers, and providing access to remedy where applicable and necessary.

Interests and views of value chain workers

SBM-2

To understand the perspectives of workers, particularly those who may be vulnerable or marginalised, we engage and gather insights through:

- Pre-qualification questionnaires that include questions on labour practices and human rights compliance
- Annual confirmations from joint venture partners regarding governance and incident reporting
- Whistleblowing reports submitted by workers in the value chain
- External data sources such as ILO, UNICEF, and OECD to assess jurisdictional risks
- Participation in ethical sourcing initiatives such as Bettercoal (although we ceased burning coal in 2025 we remain members and continue to influence improved practices), RECOSI and SSI.

These inputs help inform our HRDD and guide our risk mitigation strategies.

Processes for engagement

S2-2

We engage with value chain workers and suppliers through a variety of channels:

- Auditing: Regular audits in Ireland and in non-EU countries are conducted in partnership with independent third parties
- Supplier Onboarding: Suppliers are required to confirm compliance with CES and Requirements for Third Parties, which is a mandatory condition for contract award
- Ongoing Contract Management: Business units maintain regular engagement with suppliers to monitor compliance and address issues
- Industry Collaboration: ESB participates in responsible sourcing initiatives and engages with third-party analytics providers to identify ESG risks
- Capacity Building: Through the Irish Supply Chain Sustainability School, ESB supports suppliers in understanding and implementing human rights policies.

Responsibility for overseeing engagement lies with the Chief Procurement Officer, with additional oversight by ESB-appointed directors in joint ventures.

Grievance mechanisms and remedy

S2-3

We provide multiple channels for value chain workers to raise concerns, including:

- A confidential, independently managed helpline and web service (available 24/7)
- Group Internal Auditor Manager on: gia@esb.ie
- External parties as outlined in the Protected Disclosures Act.

All reports are acknowledged within seven days, and an impartial assessment is initiated. Where necessary, a formal investigation is conducted, and feedback is provided within three months.

To ensure effectiveness, we:

- Track and monitor all reported issues through our GIA function
- Review whistleblowing reports quarterly for human rights-related impacts
- Ensure that grievance channels are accessible and clearly communicated through the Modern Slavery Policy and “Our Code”
- Commit to non-retaliation and confidentiality for all individuals raising concerns.

Targets

S2-5

We haven’t yet established formal quantitative targets specific to value chain workers, but we are actively developing a framework to support target-setting and performance monitoring in this area.

Target development process

As part of our broader HRDD programme, we’re undertaking the following steps to define meaningful and measurable targets that:

- Engage with value chain workers through existing channels, primarily supplier relationship management, additionally including audit programmes and whistleblowing reports
- Consult external reports and expert insights to inform the feasibility and relevance of proposed targets
- Align with our sustainability leadership objectives and risk management priorities.

S2 Workers in the value chain continued

Actions

S2-4

We recognise that workers in our value chain may be exposed to heightened risks in jurisdictions where labour protections are less robust. In response, we have implemented a structured programme of actions to prevent, mitigate, and remediate material negative impacts, while supporting continuous improvement in working conditions across our supply chain. This is complemented by ongoing engagement with and continued monitoring of the following to ensure our actions remain aligned with emerging best practice and evolving expectations:

- Industry bodies
- International human rights organisations
- Relevant global initiatives.

IRO		Key actions taken	Future actions
42	**Negative impact on value chain workers** – owing to countries where suppliers or suppliers of partners are/may be based and where labour laws may not protect workers and their working conditions	We are in the process of establishing a formal HRDD process (see our Own Workforce chapter, Our approach, page 81 for more information) and have completed a human rights saliency assessment in line with OECD guidelines. Monitoring is supported by Contractor Employment Standards audits across ESB-managed sites in Ireland and the United Kingdom and workplace conditions assessment audits of suppliers in non-EU jurisdictions.	In 2026, ESB will combine the Modern Slavery and Contractors Employment Standards policies into a single Workers in the Value Chain Policy, providing a unified framework for managing standards across ESB's entire value chain. This will strengthen due diligence processes and ensure that robust mechanisms are in place to identify, prevent and respond to modern slavery risks or other unethical practices.
		As outlined in our Group Policy on Modern Slavery and reported on annually in our Modern Slavery Statement, we've embedded human rights and ethical labour standards into our procurement and governance frameworks. All supplier contracts include clauses requiring compliance with employment legislation, anti-slavery and human trafficking laws, and ethical conduct standards. These are supported by risk screening and audit provisions. Procurement processes include compliance checks on modern slavery and labour laws, with non-compliance grounds for exclusion.	
		A new Supplier Charter was published in 2025 with a supplier event held in March to launch it. Suppliers are required to confirm adherence to ESB's Third Party Requirements and the Supplier Charter, which articulate our zero-tolerance approach to human rights abuses. Supplier capability is further supported through participation in the Irish Supply Chain Sustainability School.	
		In relation to joint ventures, we conduct mandatory risk assessments prior to formation, evaluating alignment with our values and governance standards. Governance frameworks are adopted for all non-wholly owned entities not operating within our internal control environment. We seek to retain audit rights and obtain annual confirmations of governance compliance. While ESB policies do not directly apply to joint ventures, partners are expected to operate in a manner consistent with the spirit of our policies.	
		We are enhancing our approach to responsible sourcing by aligning procurement practices with international standards, including ISO 20400 and the Ethical Trading Initiative base code.	
		We are updating our due diligence procedures and expanding supplier engagement through training and collaboration, including continued support for the Irish Supply Chain Sustainability School, of which ESB was a founder member in Ireland.	

S2 Workers in the value chain continued

Actions continued

CASE STUDY

Solar Stewardship Initiative – driving responsible supply chains

IROs
See page 102
42 43

The context
ESB recognised the need for transparency and to uphold human rights and sustainability standards across its value chain. Aligned with our Sustainable Procurement Principles and ISO 20400, we identified a suitable industry collaborative initiative and in 2025 joined the Solar Stewardship Initiative. In 2025, ESB joined the Solar Stewardship Initiative (SSI) as part of its commitment to upholding human rights and sustainability standards across its value chain. SSI is an industry-led programme designed to raise standards and enhance transparency in the global solar PV supply chain.

What we did
Through participation in SSI, ESB collaborates with other stakeholders to address key risks associated with solar technology production, including modern slavery, resource use, and ethical sourcing, supporting a responsible and sustainable energy transition.

For example, the initiative complements our new Workers in the Value Chain Policy. This policy consolidates Modern Slavery and Contractor Employment Standards into a single operational framework. Our Supplier Charter, launched in Q1 2025, sets clear expectations for ethical practices, also reinforcing SSI principles.

Our membership of SSI

SSI supports three core objectives:

Ensuring **responsible sourcing** of solar components through robust due-diligence frameworks.

Aligning ESB's **procurement practices** with international human rights standards and **OECD guidelines**.

Supporting **industry-wide efforts** to create a standardised assurance framework for solar PV supply chains.

The impact we're creating
As a result of joining SSI, we're part of the push towards enhanced transparency and accountability in solar PV procurement, reducing risks of human rights violations. We're contributing to global efforts for sustainable energy transition by ensuring solar projects are built on responsible practices. This all strengthens our reputation as a leader in ethical supply chain management.

What we're doing next
Going forward, we will continue to actively contribute to raising industry standards, including through participation in the SSI procurement working group collaborating to develop minimum standards.

S2 Workers in the value chain continued

Actions continued

CASE STUDY

Sustainable procurement at ESB – raising the bar for net zero

IROs
See page 102
42 43

The context
Sustainable procurement is central to ESB's Net Zero 2040 Strategy, with an annual procurement spend of approximately €2.4 billion. We've transformed procurement practices to embed environmental, social, and governance (ESG) standards across the value chain. The newly launched ESB Supplier Charter 2025 marks a step-change in partnership, transparency, and ambition – setting clear expectations for a resilient and responsible supply chain.

What we did
Launched in 2025, the Supplier Charter sets out sustainable procurement principles and requirements for all suppliers, making it a core pillar of supplier engagement and contract expectations. It's built on our Sustainability Leadership Plan (Planet, Place, People), with an emphasis on circular economy, resource efficiency, social value, and transparent due diligence. The Charter is now referenced across new and existing contracts, supporting compliance with CSRD/CSDDD and reinforcing our procurement as an enabler of Net Zero. It's anchored by the Supplier Charter, ISO 20400 alignment, and large-scale supplier capability initiatives.

We've directly engaged with over 450 suppliers through our Sustainable Procurement video and other charter communications. We're holding ongoing briefings and workshops to build capability and reinforce expectations.

The impact we're creating
ESB's sustainable procurement programme is setting a new standard for the sector. It empowers suppliers, accelerates progress toward net zero, and builds a supply chain that is resilient, responsible, and future ready.

- Systemic change: Sustainability criteria are embedded into major tenders, with lifecycle cost assessments, circularity requirements, social value objectives, and transparent due diligence
- Charter adoption: Charter expectations are integrated into contract language and supplier guidance, supporting measurable improvements across the value chain
- Circular economy in action: Procurement has supported initiatives such as refurbishment and asset life extension, ash reuse feasibility, and biodiversity projects – demonstrating how sourcing decisions enable circularity and ecosystem benefits.

What we're doing next
Looking ahead, we will continue to build supplier capability by partnering with the Supply Chain Sustainability School, a free virtual learning platform focused on sustainability in the built environment. This collaboration will support ongoing learning, strengthen supplier performance and accelerate progress towards a more sustainable and future-ready supply chain.

S2 Workers in the value chain continued

Actions continued

To manage reputational risks, ESB engages in collaborative industry initiatives and maintains strong internal governance as outlined in the actions below. All ESB procurement is conducted in a manner that is compliant with all applicable National and EU procurement law and the Code of Practice for the Governance of State Bodies and ISO 24000 sustainable procurement guidance.

Metrics

No relevant metrics are currently available for this topical disclosure. We are in the process of reviewing our data collection capabilities and governance procedures to support future reporting and ensure alignment with the CSRD framework.

IRO		Key actions taken
43	**Working conditions and other work-related rights** **Reputational risk** – if using suppliers or engaging with partners with poor compliance on labour laws, working conditions and human rights or those engaging in unethical business conduct	We have been an active participant in the Bettercoal organisation since 2013, promoting improved labour standards in the coal supply chain. Although we ceased burning coal in 2025, we remain members and continue to influence improved practices. We are an active participant member of the RECOSI Gas Programme, which is involved in developing a standardised ESG assurance framework for responsible gas sourcing. We are also a member of the SSI, joining in 2025, which aims to increase transparency and enhance standards across all aspects of the Solar Value Chain (see the case study on page 106 for more information).
		Our Code of Ethics governs all activities, ensuring integrity, impartiality, and transparency in all we do. It's the policy of ESB to conduct all of its business in an honest and ethical manner. All third parties are required to confirm compliance with ESB's Requirements for Third Parties Policy, which contains minimum requirements in terms of employment standards (see Policies to the right). ESB also maintains cyber governance policies to protect third-party data and ensure responsible data handling.
		We actively support reporting of any wrongdoing through our Whistleblowing and Protected Disclosures Policy, which provides accessible and confidential channels for value chain workers to raise concerns. These concerns are monitored by ESB's Internal Audit function to ensure timely and fair resolution. Investigations are carried out objectively, following clear procedures and accountability standards, with outcomes communicated within defined timeframes.

We assess the effectiveness of these actions, in line with our Modern Slavery Policy, through regular audits, review of external audit findings, analysis of whistleblowing reports, and outcomes from the HRDD process. Through these measures, ESB continues to strengthen its approach to managing human rights risks, preventing modern slavery and forced labour, and promoting responsible business conduct across our value chain.

Policies

S2-1

We're committed to upholding the rights and wellbeing of workers across its value chain. Our policies are aligned with international human rights standards and are designed to ensure that all third parties conducting business with us meet our expectations for ethical conduct, labour rights, and responsible sourcing. We've implemented a comprehensive suite of policies to manage IROs related to workers in the value chain. These include:

Policies	Where publicly available
ESB Group Policy on Human Rights	here
Workers in the Value Chain Policy	
ESB Supplier Charter	
ESB Requirements for Third Parties	
Governance of Non-Wholly Owned Entities	
Our Code	

S3 Affected communities

Topical disclosure structure

Why this matters

Strong, resilient communities are essential to the successful delivery of ESB's strategy and the net zero transition

As a national electricity utility with infrastructure embedded across towns, cities and rural landscapes, ESB operates in close proximity to the communities we serve. Maintaining trust, social licence and meaningful engagement is therefore critical to delivering infrastructure at the pace and scale required.

Within ESB's Sustainability Leadership Plan, communities are a core focus under the Place pillar, reflecting our commitment to delivering social value alongside environmental outcomes. While the energy transition brings opportunities such as cleaner air, new jobs and local investment, it can also create disruption if not managed responsibly. Embedding community considerations into planning and investment decisions helps reduce delivery risk, avoid delays and support long-term societal wellbeing.

ESB recognises that communities living or working near our assets and development sites may experience impacts associated with our activities and value chain. Our DMA highlights both local communities and more remote communities connected to our supply chain as areas of focus. Understanding how our operations intersect with community wellbeing informs how we plan, build and operate our infrastructure.

Our approach

Our approach is guided by ESB's values, with being trusted central to how we engage with communities. Public safety, responsible development and respect for human rights underpin our decision making. ESB Networks' Public Safety Strategy 2026–2030 provides a structured framework to manage safety risks associated with the electricity network, supported by clear governance, stakeholder collaboration and performance monitoring.

Community perspectives are integrated throughout project lifecycles through early engagement, statutory planning processes and community benefit schemes for near neighbours of wind and solar projects. This topic is addressed within ESB's developing People Centred Sustainability strategic roadmap, which provides an integrated framework for managing social impacts across our value chain. By working in partnership with communities, ESB strengthens its social licence and underpins delivery of a resilient, decarbonised electricity system.

S3 Affected communities continued

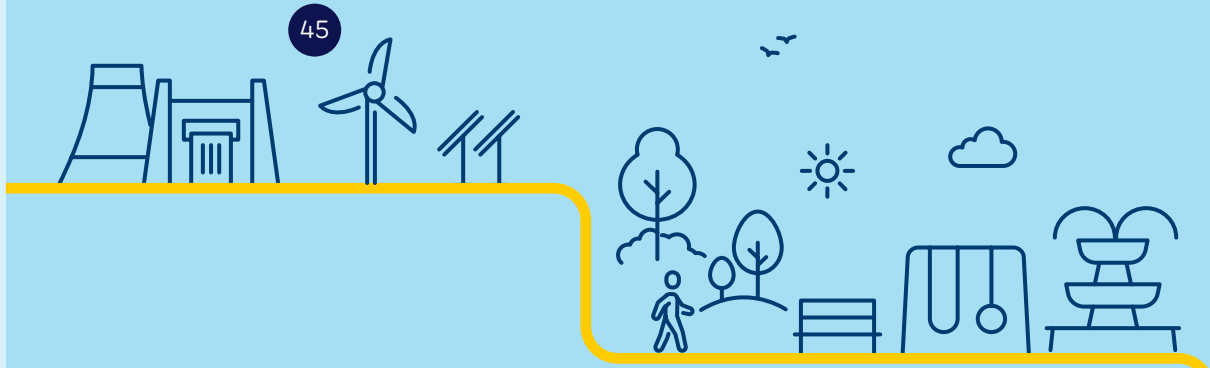
Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Timeframe
- S Short term
- M Medium term
- L Long term

Value chain location
- U Upstream
- O Own operations
- D Downstream

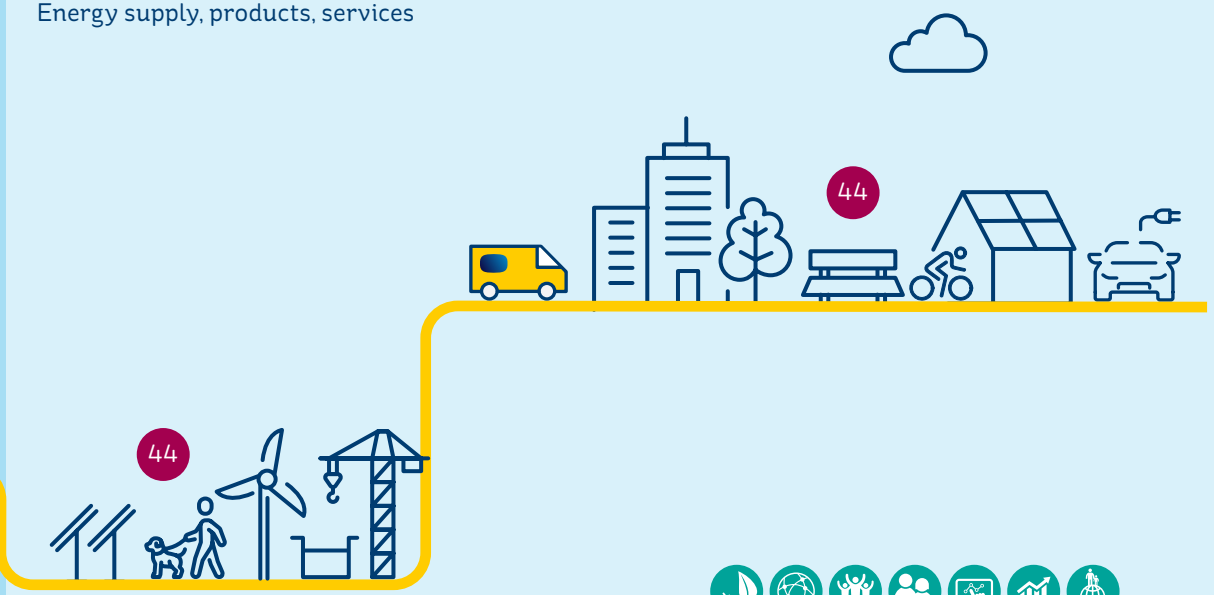
Material impacts, risks and opportunities

Own operations
Business operations



Stakeholders affected
- (D) Affected communities
- (F) Society

Downstream
Energy supply, products, services



Stakeholders affected
- (D) Affected communities
- (F) Society

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Material IRO S3-SBM-3		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 17 Communities, economic, social and cultural right				
44	**Negative impacts on public safety** – members of the public may encounter power lines or other assets resulting in injury		S	D
45	**Risk of community opposition** – there may be delays to developing generation or network assets caused by community objections		M	O

S3 Affected communities continued

Material impacts, risks and opportunities continued

How we manage these IROs

ESB manages these material IROs through proactive engagement with affected communities, safety-focused operational practices and structured governance processes.

Public safety impacts identified as material through the DMA relate specifically to ESB Networks' activities. While public safety is managed across all ESB business areas, only network-related public safety impacts were assessed as material; therefore, this section focuses on ESB Networks. Governance of these impacts is overseen by the ESB Networks Safety, Health and Environmental Board (SHEB), which is responsible for public safety performance and ensures that risks arising from interactions with network assets are effectively managed. ESB Networks' Public Safety Strategy 2026–2030 provides the strategic framework for this work.

ESB manages the risk of community opposition through early engagement, transparent consultation, community benefits, and strong safety communication. We contribute more than €2 million to community initiatives across Ireland every year. Our Community Benefit Funds are a central pillar of this work, providing support to projects in the vicinity of our wind and solar farms.

For distribution projects, ESB Networks' approach is to work closely with local communities in relation to the infrastructure, to help identify concerns early, support the mitigation of land related risks, and enable responsible and socially responsive development.

These measures are underpinned by internal policies and procedures (see Polices on page 120 for more information) that ensure concerns raised by communities are addressed appropriately and that risks are effectively mitigated. We continue to monitor and review these processes to ensure they remain responsive to community needs and aligned with evolving regulatory and stakeholder expectations.

Engagement and remediation process

We engage with affected communities across all areas of our operations, recognising that meaningful engagement is central to managing impacts, building trust, and ensuring that our infrastructure and services reflect evolving social expectations of society, today and in the future. Engagement structures and processes vary across the organisation. We do not operate a single Group-wide community concerns mechanism for general complaints, although a Group-wide framework does exist for human rights-related concerns.

Business unit level engagement approaches

S3-2

Each business unit (BU) applies tailored engagement processes and has dedicated personnel to support interactions with affected communities. Across the organisation, ESB draws on a range of professionals, including Community Engagement Managers, Community Relations Managers, Land Access Engagement specialists, stakeholder engagement teams and communications professionals who support engagement activities for projects of different scales and levels of impact.

S3 Affected communities continued

ESB Networks' Stakeholder Engagement Framework

ESB Networks employs a structured Strategic Stakeholder Engagement Framework, based on a continuous five-step process and underpinned by the principles of transparency, collaboration and continuous improvement. A variety of engagement channels are made available, including:

- Public consultations
- External panels and working groups
- Bilateral meetings
- Digital channels
- Community engagement initiatives.

ESB Networks' approach is informed by international best practice, guided by the AA1000 Stakeholder Engagement Standard (AA1000SES). In Q2 2025, ESB Networks joined the AA1000SES Working Group as part of the Practitioner Review Committee, contributing to the development of Version 3 and accessing global benchmarking best-practice stakeholder engagement.

AA1000 Stakeholder Engagement Standard (2015) and AA1000 Stakeholder Engagement Principles (2018) are available at: https://www.accountability.org/standards/

Stakeholder engagement is a strategic priority for ESB Networks, led by the Managing Director and the Senior Leadership team. While engagement is considered part of every employee's responsibility, ESB Networks also has a dedicated Stakeholder Engagement Manager and team. These structures are under review in light of the PR6 investment programme, including updates to the steering group's terms of reference.

Tailored engagement by project and location

Engagement with communities is adapted to the scale, context and potential impacts of individual projects or activities. ESB uses a mix of formal and informal methods with public consultation undertaken in accordance with planning legislation. Additional engagement is supported through:

- Local elected representatives
- Community liaison officers
- Representative groups.

For large-scale infrastructure projects, we appoint dedicated Community Engagement Managers or external communications specialists to lead public consultation and maintain ongoing dialogue. For smaller projects, engagement is typically managed through existing operational teams, with support from local contacts.

For large programmes of work, such as our five-year investment programmes, insights from consultations, workshops, and direct engagement help prioritise investments, refine programme design and ensure alignment with expectations of Government, the CRU and wider society.

Integration into decision-making

Community perspectives form a key part of ESB's investment and project-planning processes. The type and frequency of engagement activities are determined by project characteristics and potential for community impact. ESB's approach also supports evaluation of development proposals through full application of statutory consenting procedures and the discharge of planning conditions.

Engagement with affected communities, as part of wider stakeholder management activities, are the responsibility of the senior management within the project. The outcomes from these engagement activities are used to inform risk management and decision-making.

ESB Networks recognises that effective stakeholder engagement is essential for the successful management of its business. As a strategic priority, it is led by the Managing Director and the Senior Leadership team and is seen as a vital activity at every level of the organisation.

Stakeholder engagement is embedded in its business culture and is seen as the role and responsibility of every employee within the organisation. In addition, a dedicated Stakeholder Engagement team coordinates ESB Networks' stakeholder engagement activities, which includes preparing the annual stakeholder engagement strategy and tracking and reporting on stakeholder engagement activities. The team is also responsible for putting in place structures to coordinate stakeholder engagement across the business.

S3 Affected communities continued

Approach and process for providing remedy

S3-3

General complaints:

ESB has detailed systems and processes in place for managing customer complaints. ESB Environmental Systems manages public complaints related to environmental and planning impacts through Environmental Management Systems (EMS) at relevant operational sites. These systems outline procedures for receiving, recording, and addressing complaints through to resolution.

Human rights-related concerns:

ESB has adopted a Group-wide human rights policy framework to identify, prevent, and mitigate potential or actual human rights abuses across its value chain. Where ESB's operations cause or contribute to adverse impacts, we commit to taking appropriate action to address and remedy them.

In line with ESB's Human Rights Policy, affected community members can raise concerns through several channels:

1. **Confidential helpline/web service**
   Operated independently by a third-party provider, this service is available 24 hours a day, 7 days a week, ensuring anonymity and impartiality.
2. **External party**
   Concerns may also be raised with designated external parties as outlined in the Protected Disclosures Act.
3. **Community liaison for generation trading projects**
   Contact details are provided through the Asset Development Community Engagement Framework.
4. **ESB Networks' project contacts**
   Community members may also report concerns through the designated representative or contact number provided in the Code of Practice for Survey, Construction and Maintenance of Overhead Lines in Relation to the Rights of Landowners.

These channels reflect ESB's commitment to upholding human rights and ensuring that all stakeholders have access to fair and transparent grievance mechanisms.

Tracking and monitoring issues raised

ESB's GIA function tracks and monitors all issues received via the Confidential Helpline through to resolution. Reviews are carried out quarterly to any potential human rights-related patterns or impacts, and ESB continues to strengthen these processes; however, we do not currently assess the extent to which affected communities are aware of or trust the available channels.

S3 Affected communities continued

CASE STUDY

ESB Community Benefit Fund – empowering local communities

IROs
See page 102 and 110 43 45

The context
We've put community benefit funds in place to encourage stronger interaction and engagement with communities neighbouring our wind farm and solar sites in Ireland and Great Britain. ESB's Community Benefit Fund makes €1 million available to communities neighbouring its wind farm and solar sites for the development of local infrastructure and services. We deliver the fund alongside joint venture partners.

This fund ensures that renewable energy projects deliver tangible, long-term benefits to local communities. Since it started, the fund has invested over €5.3 million in more than 1,000 projects, supporting social, cultural, and environmental initiatives. These projects align with CSRD ESRS S3 (Affected Communities) and ESB's Net Zero 2040 Strategy.

Ballyfad Community hall revitalisation (Raheenleagh Wind Farm)

An old community hall in a 19th-century schoolhouse was transformed into a vibrant hub for local residents. The hall now hosts Irish language classes, youth clubs, and remote working facilities.

Outcomes:
- €94,800 awarded over 12 years enabled structural renovations and modern amenities
- Created a central space for cultural and educational activities, reducing rural isolation.

Impact:
- Increased community engagement and social cohesion
- Supports ESB's commitment to cultural heritage and inclusive development.

All-weather sports pitch – Kilanerin Ballyfad GAA Club

Development of a durable, all-weather pitch for local sports teams and schools.

Outcomes:
- Provides year-round access for training and matches, regardless of weather conditions
- Promotes physical health and wellbeing for all age groups.

Impact:
- Strengthened community spirit through sport
- Aligns with SDG 3 (Good Health and Well-being).

Near Neighbour Initiative – Cappawhite Wind Farm

Pilot programme offering additional support to residents living closest to the wind farm.

Outcomes:
- Builds trust and strengthens ESB's relationship with local communities
- Provides tailored benefits beyond standard fund allocations.

Impact:
- Enhanced social licence for renewable projects.

The impact

The initiatives made possible by this Community Benefit Fund have myriad impacts, such as creating a central space for cultural and educational activities, which reduces rural isolation; promoting physical health and wellbeing for all age groups and strengthening community spirit through sport; encouraging outdoor activity and appreciation of renewable energy infrastructure, and enhancing local tourism potential.

What we're doing next

We will continue to expand the Community Benefit Fund, support new local initiatives and work closely with communities to ensure that the transition to clean energy delivers meaningful, long-term benefits for the people who host our projects.

S3 Affected communities continued

Targets

S3-5

We are actively implementing actions that support affected communities, delivered primarily through the ESB Networks Public Safety Strategy (update 2026–2030) and the multi-channel engagement approaches used across the organisation in the development and operation of assets.

While we have not yet formalised dedicated targets relating specifically to affected communities, work is underway to develop measurable objectives that reflect our ongoing commitments. These future targets may include indicators linked to public safety performance and the effectiveness of community engagement activities. As part of target-setting, we will engage with stakeholders through existing mechanisms, including public consultations, community representatives and established feedback channels – to ensure the resulting objectives are meaningful, feasible and aligned with community needs. Progress against these targets will be monitored and reported through ESB's wider sustainability performance framework.

Employee volunteering

IROs
See page 110 45

Employees of ESB volunteer in many ways, from committee membership of both the EFG Fund and ElectricAid, to getting involved in a variety of volunteering initiatives and organising fundraising events. ESB also partners with BITC in both primary and secondary schools throughout Ireland, enabling employees to volunteer in the Time to Read, Time to Count, Towards your Future and World of Work programmes. These programmes aim to improve literacy and numeracy skills in primary schools and prepare secondary school students for the world of work. In 2025, over 100 ESB employees volunteered almost 1,000 direct hours on these initiatives, supporting c.180 students nationwide.

ESB employees who volunteer over 20 hours with a registered charity can apply for €500 funding for their charity and an additional €250 for a second charity. This initiative encouraged employee volunteering efforts, and ESB employee volunteers collectively gave over 4,300 hours to various organisations throughout Ireland during 2025. Also, as part of the EFG Fund 20-year anniversary, a Charity Champions draw took place in 2025 for ESB employees, resulting in nine charities successfully obtaining funding to a total of €20,000.

ESB employee volunteers gave over 4,300 hours during 2025

4,300 hours

In 2025, over 100 ESB employees volunteered

100+

Nine charities successfully obtained funding to a total of

€20,000

Volunteers on these initiatives supported c.180 students nationwide

c.180 students

S3 Affected communities continued

Ireland's Greenest Places

IROs
See page 110 45

Ireland's Greenest Places was a groundbreaking national partnership between Electric Ireland and The Irish Times, celebrating the communities leading Ireland's transition to a cleaner, greener future and inspiring others to join them.

Born from a shared belief that small changes can make a big difference, the initiative set out to champion sustainability at a grassroots level.

For Electric Ireland, Ireland's Greenest Places provided an authentic, human-centred platform to demonstrate real sustainability leadership, not only through its product portfolio but through its commitment to supporting people and communities.

A distinguished judging panel including Eamon Ryan, former Green Party leader and Minister for the Environment; Kevin O'Sullivan, Environment and Science Editor at The Irish Times; Lisa Browne, Head of Marketing for Electric Ireland; Rosita Boland, The Irish Times Senior Features Writer; and Mary Minehan, Features Editor ensured the competition was transparent, expert-led, and editorially robust.

The results were remarkable: over 150 sustainability submissions whittled down to five winners, a national platform celebrating environmental progress, and a legacy of community-driven storytelling that will continue to inspire.

- **Ireland's Greenest Town:** Skerries, Dublin
- **Ireland's Greenest Community:** Dysart River Project, Midlands
- **Ireland's Greenest Village:** Inagh, Co. Clare
- **Ireland's Greenest Suburb:** Dún Laoghaire, Co. Dublin
- **Ireland's Greenest Place:** Dingle Peninsula, Co. Kerry.

S3 Affected communities continued

Actions

S3-4

ESB has implemented a comprehensive suite of actions to manage and mitigate risks to public safety arising from its infrastructure as per the table to the right.

IRO		Key actions taken	Future actions
44	**Negative impacts on public safety** – members of the public may be injured by power lines or other assets resulting in injury	During 2025, ESB Networks developed its new Public Safety Strategy for the period 2026–2030. It is a comprehensive roadmap that reaffirms ESB Networks' unwavering commitment to protecting the public and those who interact with the electricity network and ESB infrastructure. This strategy builds on the strong foundations laid over the past five years with the implementation of the previous Public Safety Strategy. It sets out clear, measurable actions to enhance public safety awareness, education, and engagement. The strategy details a collaborative approach – working closely with communities, emergency services, local authorities, ESB Networks' framework partners, third-party contractors, and other stakeholders to ensure that safety is embedded in every aspect of ESB Networks' operations. We have implemented the ESB Networks Public Safety Strategy (2021–2025), which focuses on proactive engagement with at-risk groups including the farming sector, construction industry, emergency services, and the general public. Key achievements in the last five years include: • Implementation of predictive maintenance management systems • Analysis of safety data to identify root causes and implement proactive preventive safety measures • Increased interaction and collaboration with at-risk stakeholder groups • Policy for response to reports of Low/Grounded Conductors (LGC) or Contact with Conductor (CWC) successfully implemented • Use of data trends to target communication to stakeholders • Improved public awareness through integrated marketing communications targeting key audiences and enhanced with partnerships e.g., 'Stay Safe, Stay Clear' primary schools poster competition, Agriland and Irish Farmers Journal • Tailored communications to extend the reach of electrical safety awareness across the public domain • Public Safety Programme Summary dashboard developed.	As per the 2026–2030 strategy, a Public Safety Action Plan will be developed.

Continued on following page

S3 Affected communities continued

Actions continued

IRO		Key actions taken	Future actions
44	Continued from previous page **Negative impacts on public safety** – members of the public may be injured by power lines or other assets resulting in injury	• Enhanced communication channels and engagement throughout ESB Networks • Development of the Public SMS • Successful compliance with Transmission Asset Owner, Distribution Asset Owner, and Distribution System Operator licence requirements, as certified by the National Standards Authority of Ireland in public safety audits undertaken during the strategic period • Participating in any industry/peer bodies on safety.	
		ESB Networks maintains a 24/7 emergency response service and retains certification to ISO 45001 for occupational health and safety. The ESB Central SMS, which is certified to ISO 45001:2018, encompasses staff across five key business areas comprising Customer Solutions; Enterprise Services; Central Business Units; Generation Trading; and Engineering & Major Projects. ESB Networks Public Safety complete an annual independent external audit to ensure compliance with the Commission for the Regulation of Utilities licence conditions.	
		Public awareness is promoted through national media campaigns, educational outreach in schools, and targeted safety messaging. Educational initiatives include the 'Stay Safe, Stay Clear' primary school competition, which promotes awareness of electrical hazards among children. In Northern Ireland, NIE Networks delivers public safety messaging through radio, print, and digital media, and engages directly with schools through the KidzSafe programme. Safety presentations are delivered to contractors and utility partners across the sector.	
		ESB implements enhanced audit processes for ESB Smart Energy Services, electrical awareness sessions for local authorities, and targeted campaigns in partnership with farming bodies, such as IFA and through agricultural publications to promote farm safety.	

S3 Affected communities continued

Actions continued

To address the risk of community opposition to infrastructure development, ESB has established a structured approach to community engagement which involves the following key actions. These actions are supported by ESB's broader HRDD process and informed by jurisdictional risk assessments using external data sources. Through this approach, ESB aims to ensure that infrastructure development is undertaken with the support and participation of the communities it affects.

IRO		Key actions taken
45	**Risk of community opposition** – there may be delays to developing generation or network assets caused by community objections	ESB has established a structured approach to community engagement which includes early engagement with the community in the project lifecycle and is tailored to the scale and nature of the development. See Engagement Strategy and Remediation Process on pages 111–113 on how this is done. Community benefit funds are made available to support local sustainability initiatives and address emerging needs. These include the ESB Community Fund and the Wind Farm Community Fund, which are designed to enrich local communities and foster long-term positive relationships. Project teams also hold regular community engagement meetings to review progress and address any issues raised.

S3 Affected communities continued

Metrics

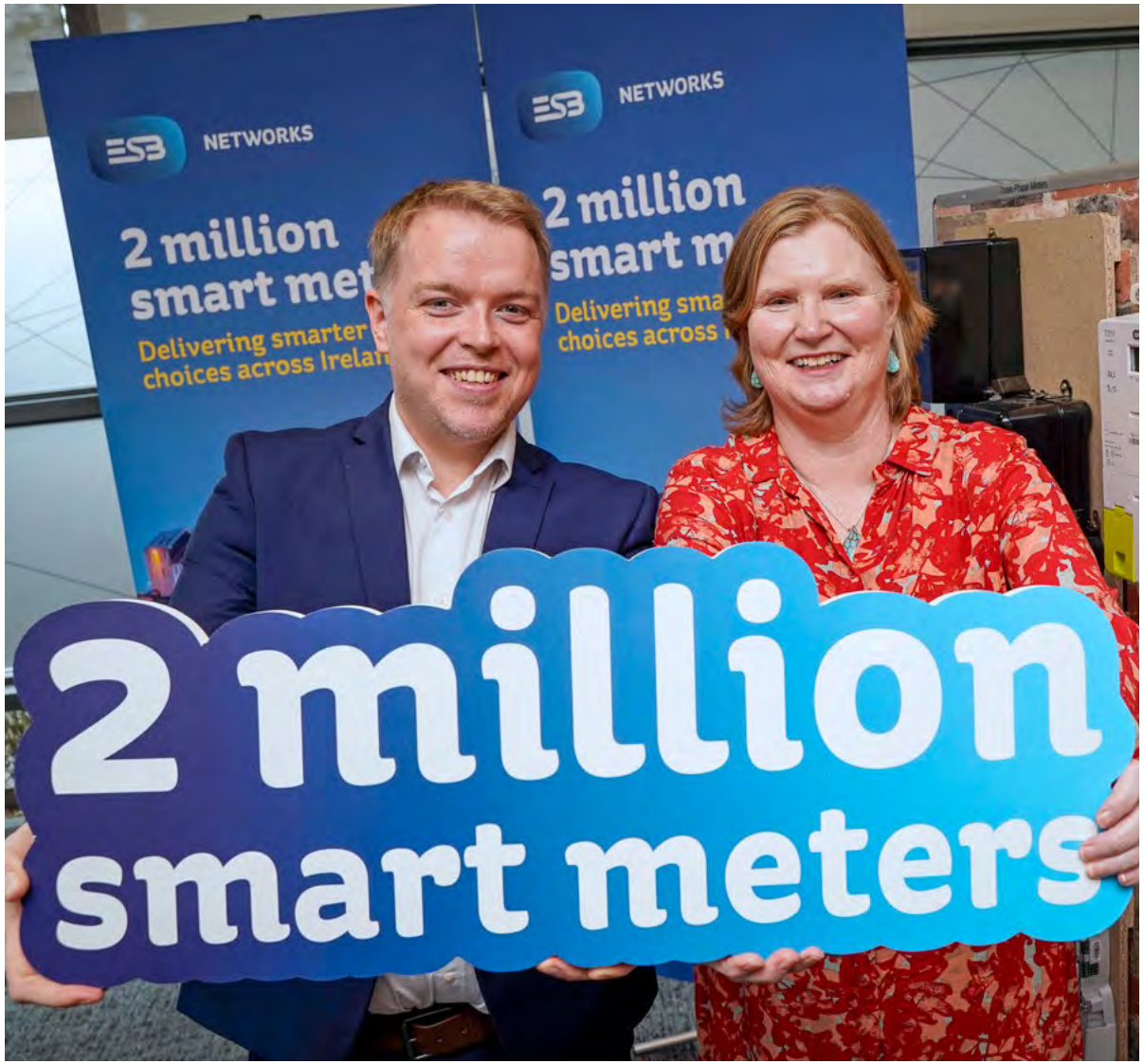
No relevant metrics are currently available for this topical disclosure. We are in the process of reviewing our data collection capabilities and governance procedures to support future reporting and ensure alignment with the CSRD framework.

Policies

S3-1

ESB has implemented a comprehensive suite of policies to manage impacts, risks and opportunities related to affected communities. These include:

Policies	Where publicly available
Human Rights Policy	here
Our Code of Conduct	
Health, Safety and Wellbeing Policy	
Environment and Sustainability Policy	
ESB Networks: Stakeholder Engagement Strategy	
ESB Networks: Public Safety Strategy as well as a Public Safety Advice publication	



S4 Consumers and end users

Topical disclosure structure

Why this matters

Customers play a central role in achieving net zero, and empowering them to participate in the energy transition is a core element of ESB's strategy.

As electricity becomes the primary energy carrier for decarbonisation, customers increasingly rely on ESB's infrastructure, services and solutions to reduce emissions, manage energy use more efficiently and maintain secure, affordable supply. Placing customers at the centre of decision making reinforces trust and supports ESB's role as a long-term partner in delivering a sustainable energy future.

Within ESB's Sustainability Leadership Plan, consumers and end users are addressed under the **People** pillar, recognising that sustainability outcomes are shaped not only by our direct actions but also by how customers are enabled to make informed and sustainable choices. Access to clean electricity, smart technologies, flexible tariffs and reliable information directly supports the **Empowered Customers** objective of ESB's **Net Zero by 2040** Strategy, while contributing to system efficiency, resilience and inclusivity.

ESB's consumers and end users span a diverse customer base, including electricity network users in the Republic of Ireland and Northern Ireland, retail customers across Ireland, Northern Ireland and Great Britain, and clients of ESB's engineering consultancy services. Engagement with these groups provides critical insight into customer needs and informs how we identify, manage and mitigate actual and potential impacts across our value chain.

Our approach

Our approach focuses on delivering accessible, affordable and inclusive energy services, recognising electricity as an essential service. Particular emphasis is placed on supporting customers who are vulnerable or experiencing financial hardship through flexible payment solutions, compassionate assistance funding and proactive engagement. Across the Group, ESB Networks and NIE Networks maintain Vulnerable Customer Registers and dedicated strategies to ensure appropriate protections and enhanced support are in place for customers with additional needs, in line with regulatory and consumer protection frameworks.

We also apply a just transition lens, including targeted engagement with energy-poor households, to ensure affordability and inclusion are safeguarded as the energy system decarbonises. This topic is addressed within ESB's developing **People-Centred Sustainability strategic roadmap**, which provides an integrated framework for managing social impacts across our value chain, including the assessment and mitigation of affordability risks. By empowering customers and responding to diverse needs, ESB supports widespread participation in the energy transition and the delivery of long-term societal value.

S4 Consumers and end users continued

Key to IROs
Negative impact | Positive impact | Financial risk | Financial opportunity

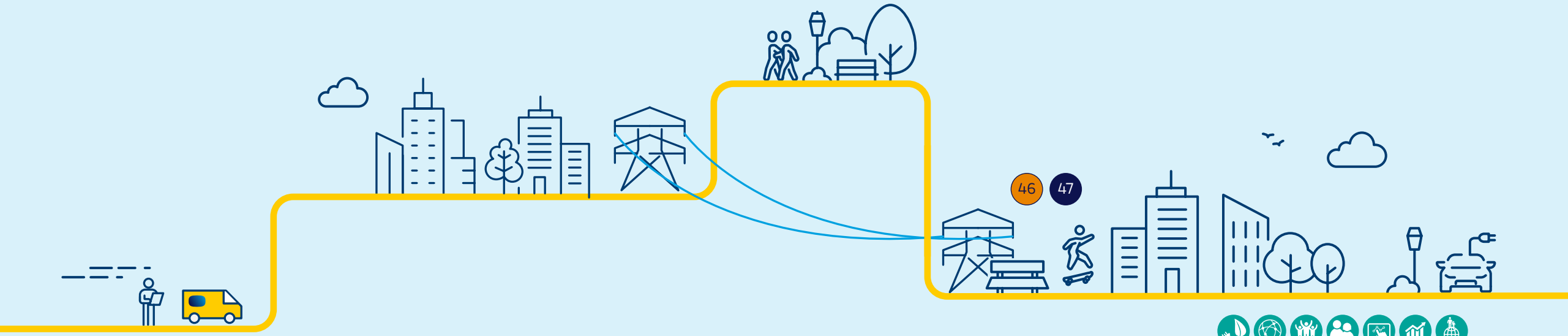
Timeframe
S Short term | M Medium term | L Long term

Value chain location
U Upstream | O Own operations | D Downstream

Material impacts, risks and opportunities

Downstream

Energy supply, products, services



Stakeholders affected (G) Customers and consumers

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Material IRO (S4-SBM-3)		Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 18 Social inclusion of consumers, and/or end-users				
46	**Positive societal impact through delivering a range of customer supports** – customer supports are administered in the form of energy credits		S	D
47	**Risks relating to energy affordability** – increasing fuel and other costs and wider economic pressures negatively impact the affordability of products and services, impacting customers and giving rise to negative political or regulatory intervention		S	D

S4 Consumers and end users continued

Material impacts, risks and opportunities continued

ESB serves a broad and diverse customer base across Ireland, Northern Ireland (NI), and Great Britain (GB). In line with our DMA results (see more in our Sustainability in Context chapter on pages 20–21), we engaged with a selection of large customers and community groups to ensure a range of stakeholder perspectives informed the identification of two material IROs related to consumers and end users.

The DMA found that ESB's key consumer-related impacts are primarily concentrated among residential customers in Ireland. A material positive impact is our contribution to social inclusion. This is supported through customer assistance initiatives designed to protect vulnerable and energy-poor households and enable equitable access to essential energy services.

The assessment also identified a material risk relating to energy affordability, stemming from rising energy costs and wider economic pressures. These risks have the potential to negatively affect consumers, particularly those experiencing financial vulnerability or hardship. This affordability challenge is further shaped by the regulatory requirement that ESB cannot cross-subsidise between different business units, as set out under CRU-regulated licence conditions. Our Generation and Supply businesses must operate separately, meaning profits from ESB's Generation business cannot be used to offset costs incurred by Electric Ireland. These restrictions ensure transparency and fair competition but also limit the range of levers available to mitigate retail price pressures.

These identified material issues are managed through a combination of targeted customer support programmes, structured engagement with customers, and policies designed to ensure access, fairness, and responsiveness. See more under Actions on pages 126–130. We continue to monitor evolving customer needs and adapt our approach to remain aligned with regulatory expectations and social priorities.

S4 Consumers and end users continued

Engagement and remediation process

S4-2

We strive to have a positive impact on all the people that we engage with, including the customers we serve. Engaging with our stakeholders is crucial to how we shape the future of our business and the electricity network. The perspectives of our customers is an important information source when we design processes to manage actual and potential impacts. We maintain a range of dedicated structures, processes and channels to ensure that consumers and end users can raise concerns, seek redress, and have issues resolved fairly, transparently and in line with regulatory and human rights commitments.

ESB dedicated structures and channels

Our public-facing businesses have established dedicated functions to manage interactions with consumers and end users, with due regard to regulatory ringfencing requirements. These teams are responsible for ensuring that engagement and issue-resolution processes are consistent, inclusive, and responsive across business lines. Channels for customer interaction include telephone, email, in-person meetings, surveys, workshops, and digital platforms.

Tailored and inclusive engagement

Complaints, concerns and feedback channels are tailored to different customer segments and service areas. For example, ESB Networks conducts telephone-based satisfaction surveys with customers, while Electric Ireland gathers insights through online and telephone interviews. These insights are reported monthly and used to inform service improvements. Additional ad hoc, topic-specific engagement (e.g. energy poverty) is conducted through workshops and third-party research to ensure that emerging issues are identified early and addressed appropriately.

Feedback integration and monitoring

Customer feedback is systematically analysed through monthly insights reports, which categorise complaints and identify recurring themes. These reports inform remedial actions and service enhancements. We also use brand awareness surveys and customer satisfaction metrics to evaluate the effectiveness of our services, engagement and marketing strategies. Engagement outcomes are integrated into strategic planning and target-setting processes.

Approach to remedy and redress

S4-3

ESB has formal complaints-handling procedures in place for ESB Networks, Electric Ireland, So Energy, ESB eCars and Electric Ireland Superhomes, enabling concerns to be addressed promptly, fairly and transparently. Complaints may result in redress or compensation on a case-by-case basis. Where issues cannot be resolved internally, they can be escalated to the CRU for independent review and resolution.

Channels for consumers and end users to raise concerns

Consumers and end users can raise concerns through multiple internal and external mechanisms:

- ESB Networks – Customers can contact the National Customer Contact Centre, as detailed in the Customer Charter and Complaints Handling Procedure
- Electric Ireland – Customers may raise concerns through the Customer Care team, in line with the Customer Charter and the Code of Practice for Complaints Handling
- The CRU – Customers may escalate complaints to the CRU for independent resolution
- Human Rights Channels – As set out in ESB's Human Rights Policy, consumers and end users are encouraged to report any concerns, issues, or suspected breaches directly to the ESB Group Internal Audit Manager or via the ESB Confidential Helpline
- Confidential Helpline/Web Service – Operated independently by a third-party provider, available 24 hours a day, 7 days a week, to ensure confidentiality and impartiality
- External Parties – Consumers may also raise concerns through the mechanisms provided under the Protected Disclosures Act.

These channels reinforce our commitment to ensuring accessible, fair, transparent, and effective grievance mechanisms for all consumers and end users.

Tracking and monitoring issues raised

We operate robust systems to track, monitor and resolve issues raised through our various reporting and complaints channels:

- **GIA** oversees the Confidential Helpline, ensuring all reports are tracked to resolution. Quarterly reviews assess the potential for human rights-related impacts, in line with the Whistleblowing and Protected Disclosures Policy. Reporting individuals receive updates following the initial assessment and within three months thereafter
- **ESB Networks** records and monitors complaints through a dedicated complaints management system. Cases are tracked until resolution, and insights are consolidated in a monthly complaints management report to support continuous improvement
- **Electric Ireland** logs and tracks all complaints through its dedicated system, with a typical final response issued within two months unless ongoing engagement is required. Complaint trends and resolution performance are monitored through a monthly query and complaints dashboard.

These mechanisms help ensure that consumer concerns are not only addressed but also inform ongoing service enhancements, operational improvements and risk management processes.

S4 Consumers and end users continued

Targets

S4-5

To support the delivery of our strategy and manage material IROs relating to customers and end users, we have established the following targets:

- Install over 2.6 million smart meters by 2030
- Achieve over 85% customer satisfaction across customer-facing business lines by 2030.

These targets are informed by customer engagement and internal risk assessments. Progress is monitored through customer satisfaction surveys, brand awareness surveys, and operational dashboards. Customer feedback is then used to refine targets and ensure they remain relevant and achievable.

CASE STUDY

Driving Ireland's EV future – completion of €23M charging programme

IROs
See page 122 46

The context
In October 2025, we opened our state-of-the-art high-power charging hub at Airside Retail Park, Swords, Co. Dublin. This milestone marked the successful completion of a €23 million investment programme to transform Ireland's public EV charging network. It was co-funded by the Government's Climate Action Fund (CAF) and ESB, showing how strategic partnerships and bold ambition can accelerate the transition to a cleaner, greener future. This project aligns with both national climate targets and our own Net Zero 2040 vision.

What we did
Through this project, we significantly improved the speed and reliability of our public EV charging network across the country. Specifically we:

- Delivered over 55 new charging hubs: including 52 high-power hubs (150 kW and above), enabling ultra-fast charging for modern EVs
- Upgraded 100 charge points: faster speeds mean shorter charging times and greater convenience
- Replaced 500 AC charge points: improving reliability and user experience across the network.

The impact
We now operate one of Europe's most robust and future-proof EV charging infrastructures. We're empowering drivers – reduced charging times and improved reliability make EV ownership easier and more attractive. This is a tangible step towards decarbonising transport and achieving Ireland's climate goals, demonstrating our leadership on climate.

What we're doing next
Going forward, we will build on this investment by continuing to strengthen Ireland's public EV charging network. We are actively contributing to the development of industry-wide best practice, including through participation in sector working groups focused on setting minimum standards for charging infrastructure. This ongoing collaboration will help ensure that our network remains reliable, future-ready and aligned with national climate ambitions.

S4 Consumers and end users continued

Actions

S4-4

We deliver a range of initiatives aimed at supporting social inclusion and improving outcomes for our consumers and end users. These include:

IRO		Key actions taken
46	**Positive societal impact through delivering a range of customer supports** – customer supports are administered in the form of energy credits	Electric Ireland has committed €1 million to a programme of targeted activities for this winter 25/26. This includes a range of measures such as a Compassionate Assistance Fund, incentivising Smart Pay-As-You-Go (PAYG) and Instalment Plans, Energy Cost Education and enhanced Customer Care.
		We offer household budgeting schemes and flexible payment plans to help certain vulnerable customers manage energy costs.
		We support our customers with advanced electricity insights to manage their energy usage through smart meter price plans. These are delivered in a number of ways: • We offer Time of Use Tariffs, designed for homes that have a smart meter. Instead of paying one flat price all day, the price per unit of electricity changes depending on the time of day. Our time of use Tariff lets our customers save money by using electricity at cheaper times of the day, especially overnight • In addition to our bill, we provide customers an insights tool where: – Customers receive clear visibility of their electricity use across different Time of Use bands – They receive clear prompts about their highest-use periods – Insights also compare their energy usage across appliance categories – We also provide social comparisons that show customers how their usage stacks up against similar homes – These insights help inform and empower our customers to make better energy usage choices for themselves and the planet.
		We are a designated supplier of last resort, an initiative to ensure continuity of service for customers whose supplier has exited the market.
		We assist with providing information and assistance to help customers access government supports.
		Our Energy for Generations Fund sees over €1 million per year disbursed across a range of community and issues-based initiatives through a bi-annual fund to charities working in the areas of social inclusion relating to access to education as well as access to employment, and homelessness.
		ESB Networks has engaged with an external accessibility partner to redesign the customer website to optimise accessibility (98% accessibility score).

S4 Consumers and end users continued

Actions continued

Delivering for society, delivering for future us

ElectricAid

IROs
See page 122 47

Community support

Throughout 2025, ESB invested over €2 million through its social programmes aimed at community support. This included almost €1 million from the Energy for Generations Fund, €0.3 million via ElectricAid and a further €1 million via the Community Benefit Fund.

Energy For Generations (EFG) Fund

In 2025, EFG, ESB's social giving fund, marked 20 years of making an impact in communities across Ireland. Since its establishment in 2005, the EFG fund has provided €1 million annually in funding and supported 800 projects and initiatives, with a strong focus on suicide prevention and social inclusion through access to employment, access to education, and addressing homelessness.

Supporting communities at home and abroad

ESB is a proud corporate partner of the employee-funded-and-led social justice fund ElectricAid, a registered charity established by employees of ESB in 1987. Today, ElectricAid has a membership of around 2,000 serving and retired ESB and EirGrid employees, with donations matched by ESB on a 2:3 ratio to a ceiling of €300,000 annually. In 2025, ElectricAid provided almost €0.6 million in funding to 59 projects in 22 countries worldwide, and on average projects received €10K in funding.

Each project directly addressed one or more of the United Nations Sustainable Development Goals. In addition, €0.1 million in emergency funding was provided to UNICEF for humanitarian aid in Gaza and the Myanmar Emergency Appeal, and the Irish Red Cross for the Valencia floods. ElectricAid also funded €0.1 million to strategic partners, including SeeBeyondBorders to support an education project in Cambodia. Total funding released in 2025 amounted to €0.8 million. Further information is available on the ElectricAid website www.electricaidcharity.ie

1 In addition to the above, ESB provides financial support to the Business in the Community volunteering programmes ("Time to Read," "Time to Count", "Towards Your Future" and" World of Work)."

Energy for Generations
Fund celebrates 20 years

Homelessness
2005–2025: **220 projects**

€5.5m

Supported projects nationwide that focused on housing programmes and supporting people who experienced homelessness

Suicide prevention
2005–2025: **320 projects**

€8m

Funded mental health and crisis support services across Ireland with an overall aim of suicide prevention

Access to education
2011–2025: **250 projects**

€6.3m

Enabled learning and development opportunities by supporting projects that focused on education access for all

Access to employment
2024–2025: **10 projects**

€200,000

Created pathways to work through funding programmes that provided employment support

S4 Consumers and end users continued

Actions continued

To address the risk of energy affordability, we've implemented a number of mitigation measures, including the following below. The effectiveness of these initiatives is assessed through surveys, focus groups, and formal market research. ESB uses these tools to understand customer experiences and evaluate the impact of its support programmes. These actions are monitored through internal dashboards, complaints tracking systems, and customer satisfaction metrics. In addition, ESB is also exploring further mechanisms to assess the effectiveness of its affordability initiatives to ensure that they are reaching those most in need.

IRO		Key actions taken
47	**Access to products and services** **Non-discrimination** **Risks relating to energy affordability** – increasing fuel and other costs and wider economic pressures negatively impact the affordability of products and services, impacting customers and giving rise to negative political or regulatory intervention	We have made price reductions for residential electricity and gas customers in the Republic of Ireland in 2023, 2024 and 2025 (Gas Only). Since September 2024, all of our smart meter tariffs are 2% lower than our standard tariff. We have expanded the compassionate assistance funding and payment flexibility options. ESB continues to provide access to the networks for all customers, with ESB Networks connecting over 43,000 new customers during the year and NIE Networks providing over 8,000 new customer connections. A formal Energy Poverty Programme is underway: • Conduct surveys to build greater baseline knowledge of customers' energy poverty risk • Energy education campaign is in development for autumn 2025 • Partnered with Energy Cloud and exploring potential technology trials • Pilot customer support agent training in supporting distressed/vulnerable customers • Range of financial/non-financial support measures and trials are currently being considered • Electric Ireland has formally communicated support for government proposals to adapt the rules of the Energy Efficiency Obligation • Scheme to increase the potential for energy poverty measures, and to make these works more affordable • We plan to update the definition of vulnerable customers to include low-income households. Vulnerable Customer Policy – ESB Networks has received funding under PR6 to provide dedicated teams to support vulnerable customers. We are drafting a plan as part of the People-Centred Sustainability strategic roadmap to assess the affordability implications of the energy transition.

S4 Consumers and end users continued

Actions continued

CASE STUDY

Energy Poverty & Financially Vulnerable Customer Programme

Supporting financially vulnerable customers

IROs
See page 122 47

The context
Electric Ireland's Energy Poverty & Financially Vulnerable Customer Programme is a cornerstone of ESB's commitment to social sustainability and a just energy transition. Energy poverty affects nearly one-third of Irish households. This initiative recognises that while we can't eliminate energy poverty alone, we can make a significant difference by listening to customers, learning from their experiences, and leading with meaningful action. Through this programme, we aim to:

- Deepen understanding of financially vulnerable customers through research and engagement
- Deliver practical solutions that empower customers to manage energy use and costs
- Align social responsibility with ESB's Net Zero 2040 strategy, ensuring no one is left behind.

What we did
Through our customer insight programme, we conducted research and immersion exercises to understand behaviours and challenges faced by fuel-poor households. We then focused on energy advice and education: delivering targeted campaigns reaching over 1 million customers with cost-saving tips and energy literacy resources.

We trained all our customer-facing staff (approx. 450 employees) to handle vulnerability cases with empathy and expertise. We also worked with the Money Advice and Budgeting Service and ALONE (a charity supporting older people to live at home) to implement a Compassionate Assistance Fund. Together, we distributed financial support during 2025. With an innovation focus, we piloted Smart PAYG adoption incentives, enabling 5,000 customers to gain better control over energy costs.

The impact we're creating
By combining targeted initiatives like energy advice and education with substantial financial support through the Compassionate Assistance Fund delivered in partnership with organisations such as Alone and MABS, Electric Ireland is setting a benchmark for responsible business conduct and social inclusion in the energy sector. In addition, we have provided support via donations, such as recently with SVP. We've created impact through:

- Direct Support: Helped over 20,000 financially vulnerable customers through hardship funds and flexible payment options since Covid
- Policy Influence: Advocated for changes to the Energy Efficiency Obligation Scheme to improve affordability for thousands of households.

What we're doing next
Going forward, we will continue strengthening our support for financially vulnerable customers and advancing best practice across the energy sector. We will build on our insights, partnerships and training programmes to enhance how we identify and assist customers experiencing energy hardship. We will also collaborate with industry and community partners to help shape more consistent minimum standards for supporting vulnerable households. Through this ongoing work, we aim to expand our impact and ensure that the transition to net zero is fair, inclusive and leaves no customer behind.

S4 Consumers and end users continued

Actions continued

Empowering smarter energy use: 'Is this a good time?'

IROs
See page 122 46

Smart meter tariffs from Electric Ireland offer customers advanced energy insights, which allow them to understand and analyse their personal home energy use. Customers who are then willing to shift their usage to different times of the day or night with a Time of Use smart tariff like Night Boost, Weekender or a Standard Smart Tariff can further benefit from reduced electricity bills.

ESB Networks' 'Is This a Good Time?' programme offers participants the opportunity to get rewarded for creating a more sustainable Ireland. Households can earn rewards for shifting electricity use to cleaner, less congested times on the network. Participants sign up by linking their MPRN to an ESB Networks online account, and then receive alerts by SMS or email to take part in "Energy Events", either a peak event (when renewable supply is low and demand is high) or a flexibility event (when ESB Networks asks households to be flexible: sometimes by taking advantage of surplus renewable energy, and sometimes by easing off when supply is tight).

'Is This a Good Time?' now has over 40,000 participants – that's 40,000 people shifting their home's electricity use. It's a powerful sign of growing public interest in smarter energy habits, and the momentum continues to build, shifting 198.67 MWh of electricity in 2025, which is enough to make ~2 million cups of tea.

Read more
See more about the campaign here

Metrics

We monitor a number of key external facing metrics that relate to our targets and support the management of material IROs relating to our consumers and end users.

Consumers and end users	2025
Customer satisfaction score: ESB Networks	78.94%
Customer satisfaction score: Electric Ireland Residential	*83%
Total % of customer solutions customers on smart tariffs	26%
Total number of smart meters installed to date	2,080,568

* Average of monthly score.

Policies

S4-1

We have implemented a comprehensive suite of policies to manage the material IROs related to consumers and end users. These include:

Policies	Where publicly available
Human Rights Policy	here
ESB Networks: Customer Charter	
Electric Ireland: Customer Charter	
Our Code	

S4 Consumers and end users continued

Actions continued

Digital media initiative

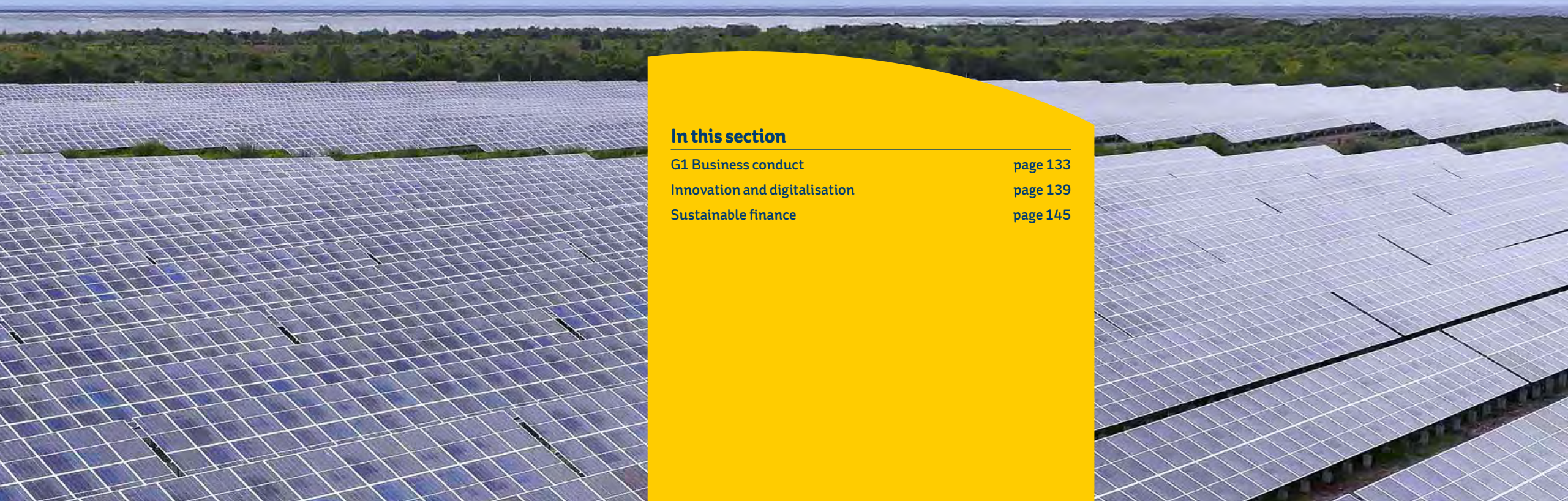
IROs
See page 122 46

Electric Ireland delivered an award-winning, world-first digital media initiative that led to a 67% reduction in digital media emissions, through its smart meter campaign. The initiative introduced a new approach that optimised both ad delivery and ad selection to significantly reduce the carbon footprint associated with online advertising. By applying adaptive streaming technology and AI-driven optimisation, the campaign ensured that video files were dynamically adjusted in size and format, using only the data required for each viewer's device and connection.

This innovation demonstrates the potential for technology-led improvements within the everyday operational activities that are critical to an energy retail business, and highlights how digital processes can be re-engineered to support ESB's broader sustainability objectives. It also reflects Electric Ireland's commitment to integrating responsible practices across its customer communications and digital channels.

The sustainability leadership of this campaign has been recognised internationally, receiving the Best Sustainable Programmatic Campaign award at the 2025 AdExchanger Programmatic Impact Awards, along with additional industry commendations. This recognition reinforces the campaign's role in advancing lower-carbon approaches within the digital advertising sector and illustrates the impact of applying sustainability principles at scale.

Governance



In this section

G1 Business conduct

Topical disclosure structure

Why this matters

Strong business conduct underpins ESB's ability to deliver its purpose, maintain trust with stakeholders and successfully implement the **Net Zero by 2040** Strategy.

As a publicly owned, infrastructure-intensive utility operating in a highly regulated environment, ESB is entrusted with delivering essential services in a manner that is ethical, transparent and accountable. High standards of business conduct are therefore fundamental to our licence to operate and long-term sustainability.

Within the **Sustainability Leadership Plan**, business conduct is embedded through the **Making it Happen** pillar, reflecting the critical role of governance, culture and decision making in delivering sustainability outcomes. Ambitious climate and sustainability objectives can only be achieved where they are supported by robust governance frameworks, clear accountability and consistent ethical behaviour across ESB and its value chain. This focus directly supports the delivery of our **Driven to Make a Difference: Net Zero by 2040** Strategy.

Our approach

Our approach to business conduct is grounded in integrity, accountability and respect, guiding how we operate across all parts of the organisation. We are committed to conducting our activities ethically and transparently, in full compliance with applicable laws, regulations and internal policies. These principles underpin the trust placed in ESB by customers, employees, partners, regulators and wider society.

ESB regularly assesses business conduct-related impacts, risks and opportunities arising from how we operate and engage externally. Key areas of focus include ethical governance, anti-bribery and corruption, political engagement and responsible lobbying. While strong preventative controls are in place to limit exposure to misconduct-related risks, we recognise the importance of continuous vigilance, effective oversight and ongoing training to reinforce expected standards of behaviour.

By embedding ethical standards, transparency and oversight into business processes and decision making, ESB reduces operational and reputational risk and strengthens the credibility of its sustainability commitments. This approach supports alignment with evolving regulatory and reporting requirements, including CSRD, and enhances the reliability and comparability of sustainability disclosures. Strong business conduct ensures that ESB's climate, environmental and social commitments translate into credible, accountable action over the long term.

G1 Business conduct continued

Material impacts, risks and opportunities

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Timeframe
- S Short term
- M Medium term
- L Long term

Value chain location
- U Upstream
- O Own operations
- D Downstream

Upstream
Supply chain and resources

Own operations
Energy supply, products, services

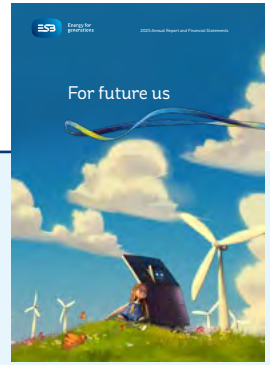
Stakeholders affected
- A Supply chain workers
- B Supply chain partners
- D Affected communities
- E Employees
- F Society
- G Customers and consumers
- H Investors

Material IRO	Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 19 Corporate culture			
48 **Positive impact through establishing a robust corporate culture and functioning compliance management system** – benefitting all stakeholders of ESB		S	O
49 **Risk of non-compliance with laws, regulations, licences** – risk of failure to comply with applicable legal and governance obligations whether imposed by law, regulation or licence		S	O
50 **Reputational risk** – if found to be engaging in unethical business conduct		S	O
Sustainability matters: 20 Political engagement			
51 **Constructive political engagement** – proactive engagement on relevant issues, can create opportunities for change which may translate to increased government investment		S	U
Sustainability matters: 21 Corruption and bribery			
52 **Positive impact from ESB's anti-bribery, corruption and fraud prevention policies and conducting business in a responsible manner** – benefitting all stakeholders of ESB		S	O
53 **Reputational risk** – if using suppliers or engaging with partners with poor compliance on labour laws, working conditions and human rights or those engaging in unethical business conduct		S	U

G1 Business conduct continued

Material impacts, risks and opportunities continued

Business conduct is a foundational element of ESB's governance and sustainability framework. Through our DMA, we have identified IROs that are material to ESB, including corporate culture, political engagement, and corruption and bribery. Further information on our materiality assessment methodology is provided in the Sustainability in Context chapter on pages 20–21. The outcomes of this assessment are detailed in the table on the previous page.



Read more
ESB 2025 Annual Report and Financial Statements

Business conduct matters

The role of administrative, management and supervisory bodies

GOV-1

The Board is responsible for ensuring that the organisation conducts its affairs in compliance with legal and regulatory obligations and in a socially responsible manner. The Board sets the tone at the top in relation to conduct, ethics and accountability supported by its collective expertise and established oversight structures.

In 2025, the Board reviewed its own Code of Conduct. The alignment and consistency of values-led behaviours demonstrated by the Board, and how these are lived through their decisions and actions, are the key to setting "tone from the top".

Board members are also mindful of their obligations under the Ethics in Public Office Act, 1995 and the Standards in Public Office Act, 2001. The Board Code of Conduct is publicly available on the ESB website.

Details of the Board's experience in Business Conduct matters are provided in the Director's biographies on pages 86–89 of the Annual Report, along with the Experience and Board Skills Mix matrix on page 99.

Business

Business conduct policies and corporate culture

G1-1

ESB's Code of Ethics, known as "Our Code", sets out the organisation's commitment to responsible and ethical business conduct and is underpinned by our core values. The Code reinforces the principle that employees best serve ESB by upholding to the highest standards of integrity, loyalty, fairness, and confidentiality, while meeting all legal and regulatory requirements.

Training on Our Code is mandatory for all new direct employees as part of induction and is available at any time through ESB's learning and development platform. Completion rates are actively monitored. We also assess corporate culture through regular staff surveys and engagement initiatives.

For regulatory ringfencing purposes, NIE Networks maintains its own Code of Ethics. Regular communications are issued to NIE Networks staff to reinforce awareness of the Code and its requirements.

So Energy has developed their own set of Core Values, Living Our Values (which develops core values into principles on how to interact and behave day to day) and a set of Must Do Training Cycles, which are aligned with local legislation, policies and procedures, while mirroring the structure and intent of ESB's Our Code.

Policies

G1-1

ESB has implemented a comprehensive suite of policies to manage impacts, risks and opportunities related to business conduct. These include:

Policies	Where publicly available
ESB Group policy on Anti-bribery, anti-corruption & fraud prevention	here
ESB Group policy on whistleblowing and protected disclosures	
ESB Code of Ethics ("Our Code")	
ESB Group policy on lobbying and political engagement	
Board Code of Conduct	

G1 Business conduct continued

Business conduct matters continued

Confirmed incidents of corruption or bribery

G1-2

GIA oversees all investigations ensuring that appropriate terms of reference are agreed, appropriate budget is available to conduct investigations and fair, unbiased investigations are conducted in line with ESB's Whistleblowing and Protected Disclosures Policy and related guidelines for investigating/managing incidents of wrongdoing. The outcome of each investigation is reported by GIA to the Audit and Risk Committee.

During 2025:

- There were no convictions or fines relating to the violation of anti-corruption or anti-bribery laws by ESB or ESB staff
- There were no confirmed incidents of corruption or bribery
- There were no confirmed incidents relating to contracts with business partners that were terminated or not renewed by an ESB Group company due to violations related to corruption or bribery
- There were no insufficiencies identified in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery.

Incidents or attempted incidents of fraud are reported to the Audit and Risk Committee on a quarterly basis.

Prevention and detection of corruption and bribery

G1-3

ESB has a zero-tolerance approach to bribery, corruption and fraud. The organisation is committed to ensuring that all reported incidents are investigated promptly, independently and objectively. ESB maintains a comprehensive Anti-Bribery, Anti-Corruption and Fraud Prevention Policy, which sets out the standards of behaviour expected of staff and outlines the controls in place to prevent, deter and detect bribery, corruption and fraud. This policy, available on the ESB website, aligns with the Irish legislation enacted in accordance with the aims of the United Nations Convention against Corruption. Please see the policies overview on the previous page for additional detail.

Key measures include:

- Mandatory online training for all staff, included in new employee induction
- Fraud risk assessment and awareness workshops facilitated by the Fraud Risk Manager
- Investigations management (Ireland): GIA oversees all investigations ensuring appropriate terms of reference, appropriate resources and the completion of fair, unbiased investigations.

These processes follow our Whistleblowing and Protected Disclosures Policy and associated guidelines.

In addition to Our Code and the Anti-Bribery, Anti-Corruption and Fraud Prevention Policy, ESB has, in compliance with the Protected Disclosures Act, 2014 (as amended), a Whistleblowing and Protected Disclosures Policy, which outlines specific procedures for the reporting and investigation of concerns raised in relation to wrongdoing. The policy is available on ESB's website. A telephone helpline and online webchat service provide employees and external parties with a confidential and, if required, anonymous means of reporting any suspected wrongdoing or ethical concerns. NIE Networks has a process in place for raising a concern to the Company Secretary. Measures to protect whistleblowers are outlined in ESB's Whistleblowing and Protected Disclosures Policy.

Ireland and the UK (other than NIE Networks)
When a wrongdoing is identified through any of the forums noted above or through business line management, an initial assessment is completed to determine whether there is sufficient information to merit a formal investigation. The initial assessment is conducted by an independent manager appointed by the Wrongdoing Triage Committee chaired by the Group Internal Auditor. Where a formal investigation is required, the Triage Committee appoints an independent investigator(s), with advice obtained from Legal and HR as required. The investigator/investigation team is independent from the incident, with no connection to the subject matter of the investigation, and will have the relevant skills and expertise to conduct the investigation properly. The investigator/investigation team may be ESB employees or external third parties (or a combination of both).

GIA oversees all investigations ensuring that fair, unbiased investigations are conducted in line with ESB's Whistleblowing and Protected Disclosures Policy and related guidelines for investigating/managing incidents of wrongdoing. The outcome of each investigation is reported by GIA to the Audit and Risk Committee and, if required, it is reported to relevant external parties including An Garda Síochána. The outcome is reported to the complainant, if known.

Investigations management (NIE Networks): The Company Secretary is responsible for ensuring any investigations are undertaken, and an impartial individual is designated to conduct the investigation to determine if there is sufficient evidence that wrongdoing may have occurred. If wrongdoing has occurred, a formal investigation will be initiated by the Company Secretary, in consultation with relevant senior managers, to investigate the matter further. Reports are made to the Police Service of Northern Ireland or to a regulatory body where appropriate. All cases are reported to GIA and subsequently reported to the Audit and Risk Committee.

G1 Business conduct continued

Political influence and lobbying activities

G1-5

Lobbying is an essential part of the democratic process and integral to ESB's broader stakeholder management plans.

In accordance with ESB policy on Lobbying and Political Engagement, ESB seeks to operate to the Responsible Lobbying Framework to ensure that lobbying activity is conducted in a transparent, consistent and accountable manner and in compliance with legal obligations. Management of compliance with ESB policy on lobbying resides with Group Compliance.

Under ESB policy, political donations are prohibited and no ESB designated lobbyists have previously held a position of Designated Public Official (DPO) in Ireland in the previous two years. ESB is registered on the EU Transparency register, registration number 441077550178-21.

ESB complies with the following lobbying legislation:

- **Ireland:**

  ESB is registered with the Standards in Public Office Commission (SIPO) on the publicly available Lobbying Register (www.lobbying.ie) and files the required returns on an annual basis.

  In accordance with the requirements of the Regulation of Lobbying Act, 2015 (as amended), ESB has made the required returns to SIPO for the three return periods across 2025 focusing on influencing government policies required to enable ESB's Net Zero by 2040 Strategy delivery. Lobbying activities in Ireland during 2025 included outlining ESB's perspective on the development of Ireland's offshore renewable policy, seeking changes to planning procedures and policy in support of the efficient delivery of renewable energy projects, and measures for ensuring a safe and resilient electricity network in the event of storms. Full details of all lobbying activity can be found on www.lobbying.ie

- **Scotland:**

  In accordance with the Lobbying (Scotland) Act, 2016, ESB is also registered with the Scottish Parliament, and two nil returns were submitted during 2025 as no lobbying activity (as defined) was deemed to have taken place.

- **United Kingdom (UK):**

  In the UK, under the Transparency of Lobbying, Non-Party, Campaigning and Trade Union Administration Act, 2014, registered consultant lobbyists engaged by ESB must submit details of lobbying activity they have completed on behalf of ESB on a quarterly basis. In 2025, external consultants in the UK engaged in lobbying efforts aimed at safeguarding vulnerable customers. These efforts focused on securing the permanent ban on acquisition-only tariffs, addressing household energy debt, and improving affordability by refining the price cap to enable greater flexibility in pricing and encourage innovation.

CASE STUDY

Embedding Sustainability through *Our Code* training

IROs
See page 134 50

The context
In 2025, ESB launched mandatory *Our Code* training for all employees, reinforcing its commitment to ethical conduct, responsible decision making and sustainability. *Our Code* is ESB's business code of ethics and sets out the principles that guide how the organisation operates, including personal integrity, respectful working relationships, environmental stewardship and wider societal impact.

Our Code is built on ESB's core values – Courageous, Caring, Driven and Trusted – which underpin the company's sustainability ambitions and its Net Zero 2040 Strategy. The training ensures that all employees understand how these values translate into everyday actions that support environmental, social and governance (ESG) objectives.

The training is mandatory for all ESB employees, ensuring a consistent and aligned approach to ethical and sustainable behaviour across the organisation and throughout its supply chain.

What we did
The training equips employees to ask, "Am I doing the right thing?" and to make decisions that positively influence the environment, society and ESB's reputation. It covers key topics including environmental protection, human rights, diversity and inclusion, anti-bribery and responsible resource use.

Managers are expected to lead by example, embedding ethical conduct and sustainability considerations in everyday team discussions and decision making. The Safety, Sustainability and Culture Committee provides oversight of how *Our Code* is embedded across the business.

The digital training module is updated annually and tracked through ESB's learning portal. Employees are encouraged to raise concerns, supporting a transparent and accountable organisational culture.

The impact
By embedding *Our Code* into employee development, ESB ensures sustainability principles are lived behaviours rather than policy statements. This strengthens ESG performance, supports delivery of the Net Zero 2040 Strategy and aligns with CSRD and ESRS expectations for ethical culture, governance and social responsibility.

What we're doing next
Looking ahead, ESB will continue to enhance *Our Code* training to deepen employee engagement. The organisation plans to roll out refresher courses annually, ensuring that ethical, sustainable, and responsible conduct remains at the forefront of its culture.

G1 Business conduct continued

CASE STUDY

Generation Trading 2025 Sustainability Fund

Empowering local action for net zero

IROs
See page 134 48

The context
In summer 2025, ESB's Generation Trading (GT) business launched the GT Sustainability Fund, a pilot initiative designed to empower employees to design and deliver locally focused sustainability projects. The fund was created to support initiatives that may not generate a direct commercial return or sit within regulatory requirements, but which offer meaningful environmental and social benefits aligned with ESB's Net Zero by 2040 Strategy. By enabling staff to shape and lead these initiatives, the fund reflects GT's ambition to strengthen community impact, foster innovation and embed sustainability into everyday work.

What we did
The fund opened for applications in July for two months. Projects selected for funding will be delivered to end of 2026, subject to local permissions and operational considerations. Engagement exceeded expectations, with 21 applications submitted from across GT, covering a wide range of sustainability themes including biodiversity, circular economy, energy efficiency and community engagement. The fund was significantly oversubscribed, with demand at twice the available budget. A dedicated Funding Committee oversaw the selection process to ensure governance, transparency and alignment with the fund's objectives. Ultimately, 10 projects were awarded funding.

Selected projects included enhancing pollinator habitats through The ESBee Project, installing solar panels and battery storage to support ESB's Nature Positive approach, exploring circular economy opportunities for Moneypoint ash, supporting Seal Rescue Ireland, creating a biodiversity garden at Carrington Primary School, installing wildlife waystations, protecting Lesser Horseshoe Bat roosts, monitoring marine mammals near Moneypoint Jetty, GPS tagging terns with BirdWatch Ireland and planting 500 native trees at Ardnacrusha.

The impact
The GT Sustainability Fund demonstrates how empowering employees can unlock innovative, high-impact sustainability solutions. Many projects go beyond compliance, reflecting ESB's ambition to lead in environmental stewardship. The strong interest and high quality of submissions indicate significant potential for future rounds and wider rollout across ESB.

What we're doing next
Going forward, the Generation Trading Sustainability Fund will establish itself further across the business unit, based on the initial momentum generated when it was first piloted in 2025. The strong interest shown in 2025 demonstrated a high demand for the funding of sustainability initiatives within the business unit and, accordingly, the fund will have additional resources available to it in 2026. The learnings from 2025 will also be taken into account in shaping the future direction of the fund, and it will act as a key enabler for locations across GT as they embark on their sustainability journeys in the coming years.

Entity specific

Innovation and digitalisation

Topical disclosure structure

Why this matters

Innovation and digitalisation are critical enablers of ESB's energy transition and long-term sustainability.

The scale and complexity of delivering net zero requires new technologies, data-driven decision making and innovative business models that can operate at pace and scale. This directly supports the Digital & Data Driven foundational capability of ESB's Net Zero by 2040 Strategy and underpins the delivery of decarbonised electricity, resilient infrastructure and empowered customers.

To support achievement of the SLP, innovation and digitalisation will play a key role in improving environmental performance and operational efficiency. Digital tools enable smarter networks, enhanced customer engagement, improved asset management and more robust sustainability reporting. By investing in innovation, ESB strengthens its ability to adapt to change, reduce costs and deliver sustainability outcomes at scale.

Our approach

Innovation has long been part of ESB's DNA – from the development of Ardnacrusha in 1927 to today's advances in renewables, digital and data technologies. As climate change, evolving customer needs and rapid technological progress reshape the energy system, innovation is essential to growing our business and leading the transition to a low-carbon future.

ESB's Group Strategy sets a clear direction for innovation-related activity, underpinned by the ESB Innovation Strategy. Innovation at ESB collaborates across the organisation and its eco-system of industry partners to envision, trial and deliver solutions that accelerate progress towards net zero. This includes enabling the decarbonisation of electricity, strengthening system resilience and empowering customers, while also supporting our foundational capabilities through developing our people, embracing data and digitalisation, maintaining financial strength and delivering on our sustainability and social responsibility ambitions.

Our Innovation Strategy enables both incremental innovation, improving existing business models and operational performance, and transformational innovation, creating new products, services and ways of working aligned to ESB's Net Zero by 2040 Strategy. Through this balanced approach, innovation and digitalisation play a central role in ensuring ESB can deliver a secure, efficient and sustainable energy system for the future.

Entity specific

Innovation and digitalisation continued

Key to IROs
Negative impact | Financial risk
Positive impact | Financial opportunity

Timeframe
S Short term
M Medium term
L Long term

Value chain location
U Upstream
O Own operations
D Downstream

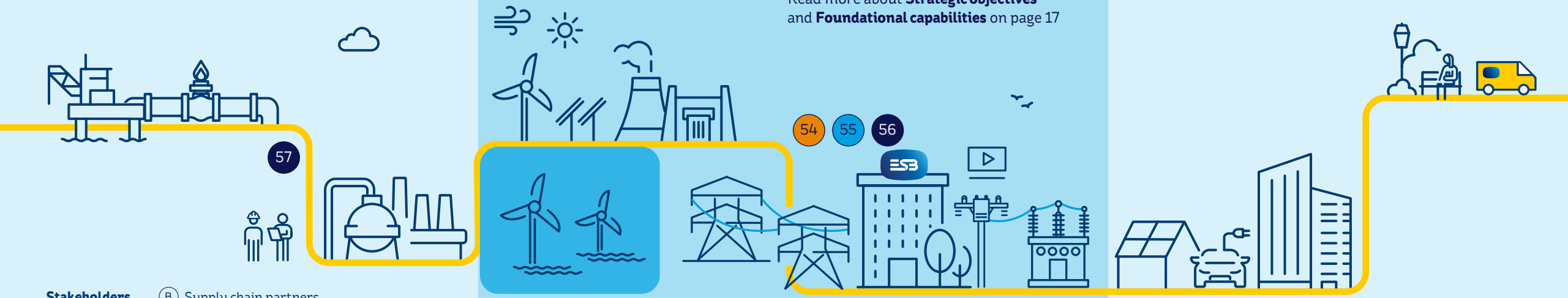
Material impacts, risks and opportunities

Upstream
Supply chain and resources

Own operations
Business operations

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Downstream
Energy supply, products, services



Stakeholders affected (B) Supply chain partners

Material IRO	Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 23 Innovation and digitalisation			
54 **Positive impacts created through investment in technology** – investing in emerging technologies (e.g. Long Duration Storage or Real Time Visualisation (RTV)) has the potential to play a key role in the resilience of the future decarbonised energy system		S	O
55 **Opportunity created through new technology adoption and technological efficiencies** – new technologies can create new opportunities, efficiencies and increase productivity		S	O
56 **Risk of system outage/cyberattack/data leakage** – extended outage of critical IT/OT systems arising from non-malicious infrastructure failures or successful cyberattacks and/or significant data leakage		S	O
57 **Risk associated with maturity of the supply chain** – there may be supply chain constraints and shortages of technology due to the immaturity of the supply chain for new technologies		S	U

Entity specific

Innovation and digitalisation continued

Material impacts, risks and opportunities continued

As part of our DMA, we have identified impacts, risks, and opportunities (IROs) that are material to our business, relating to innovation and digitalisation. Further information on our materiality assessment methodology is provided in the Sustainability in Context chapter on pages 20–21. The outcomes of this assessment are detailed in the table on the previous page.

Targets

While ESB does not currently have a specific policy or targets relating to innovation and digitalisation, we are in the process of considering if any enhancements are required to support progress on this entity-specific topic.

Actions

IRO		Key actions taken
54	**Positive impacts created through investment in technology** – investing in emerging technologies (e.g. Long-Term Evolution (LTE) Network or Real Time Visualisation (RTV)) has the potential to play a key role in the resilience of the future decarbonised energy system	Completed a proof of concept with Neara to create an engineering grade digital twin of network assets using LiDAR and digital imagery, enabling better visibility of capacity and improved resilience planning.
		Advanced Go Trade to enable real-time renewable energy tracing and hourly, geo-precise Guarantees of Origin, supporting demand shifting to high renewables periods.
		Developed eFuels opportunities that use green hydrogen and biogenic CO_2 to create zero-carbon drop in fuels for OCGTs and backup diesel sets, and a Sustainable Aviation Fuel pathway aligned with EU requirements. Delivered eHubs with partners to provide shared ecars, ebikes and ecargo bikes, demonstrating a scalable model to reduce transport emissions and empower affordable low-carbon travel choices. Initiated a pilot with ReWind to produce a material composition breakdown for the wind farm, connect to optimal recycling and decommissioning providers, and generate stakeholder-ready decommissioning plans with an aim of zero landfill waste.
		ESB produces an Emerging Technologies report each year which gives an ESB view of emerging technologies across generation, storage, empowered customer, carbon capture and storage and grid technologies.
55	**Opportunity created through new technology adoption and technological efficiencies** – new technologies can create efficiencies and increase productivity	We used QEA Tech's drone-based thermographic audits across three ESB Networks sites (Killarney, South Lotts Road, Carrick-on-Shannon) to identify energy losses, quantify impacts, and prioritise highest ROI retrofits.
		We leveraged Neara to automate asset location correction, phase tracing, and hazard detection, reducing manual processes, costs, and timelines.
		Go Trade established fractionalised GOs for efficient, data-driven matching of consumption to renewables, enabling productivity gains in energy certification and reporting.
		Our eHubs rollout improved utilisation of shared mobility assets, lowering dependence on private vehicles and supporting cost-efficient, multimodal transport.

Entity specific

Innovation and digitalisation continued

Actions continued

IRO		Key actions taken
56	**Risk of system outage/cyberattack/ data leakage** – extended outage of critical IT/OT systems arising from non-malicious infrastructure failures or successful cyberattacks and/or significant data leakage	Cyber policies, strategy and governance model in place and continued development of cyber IT/OT operating model data governance risks inherent in unified datasets.
		The cyber operating model in place to manage First Line and Second Line for IT and OT.
		Data protection policies and operating model in place across the organisation.
		Regular testing and simulation exercises for Critical Response Plans to test organisation readiness.
57	**Risk associated with maturity of the supply chain** – there may be supply chain constraints and shortages of technology due to the immaturity of the supply chain for new technologies	ESB actively collaborates across the energy supply chain and operates an open innovation eco-system to manage the supply chain constraints from the introduction of new technologies.
		ESB publishes its Innovation Strategy which includes the key new technologies it expects to partner with the supply chain.
		ESB is an active member of several industry collaborations that smoothen the supply chain risk from the introduction of new technologies, including Free Electrons, EPRI, EurElectric, and eDSO.
		ESB's collaboration strategy is designed to accelerate the transition to net zero by sharing knowledge, enhancing skills within the supply chain, and co-developing new technologies.

Entity specific

Innovation and digitalisation continued

CASE STUDY

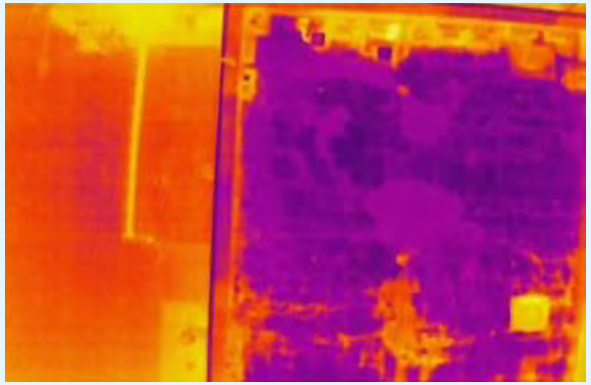
ESB and the Free Electrons Global Energy Innovation Programme

Free Electrons pilot with QEA Tech from Canada to perform non-intrusive building envelope energy audits

IROs
See page 140 54 55

The context
Free Electrons is the world's largest open innovation accelerator for energy start-ups, founded in 2017 by a consortium of global utilities, including ESB. Now entering its 10th edition, it has grown into a recognised platform that helps scale solutions essential to the clean energy transition. As climate impacts intensify, ESB recognises that achieving net zero requires global collaboration and access to emerging technologies. Free Electrons provides this through a connected ecosystem where utilities and innovators work together to accelerate decarbonisation.

What we did
As a co-founder and long-standing partner, we are involved in every stage of the programme: design, outreach, selection, piloting and knowledge sharing. In 2025, Free Electrons received 877 applications from 86 countries, reflecting its growing global reach. Our Innovation Pipeline team sources and screens solutions aligned to ESB's net zero needs, collaborates with partner utilities to deliver the programme's four modules, and engages more than 150 ESB colleagues in evaluation and partnership development.



Example of decay of insulation and connections

Each year, we work directly with the Top 15 start-ups to define use cases, scope pilots and procure proof of concept projects. This results in a steady pipeline of innovation, with ESB business units initiating on average one new pilot every two months. In 2025, nine pilots were launched, including technologies supporting wind turbine maintenance (ReBlade), grid flexibility (Copia), network capacity enhancement (Third Equation), weather resilience (Neara) and wind farm decommissioning planning (ReWind).

The impact
The programme has delivered significant value for ESB and the wider decarbonisation agenda. Free Electrons has generated more than 280 pilot projects across partner utilities, with over €123 million in follow-on investment, giving us early access to frontier technologies that support its Net Zero 2040 Strategy. It strengthens our internal capabilities by exposing teams to global innovation and embedding a culture of open collaboration. As a founding partner and frequent host of major programme events, we also enhance Ireland's global reputation in clean energy innovation.

What we are doing next
We will continue scaling successful pilots, expanding participation across business units and leveraging programme insights to advance digitalisation, grid innovation and renewable integration while maintaining Free Electrons as a key global link in ESB's net zero ecosystem.

Entity specific

Innovation and digitalisation continued

CASE STUDY

Carbon Capture and Storage (CCS) technologies ranking study

IROs
See page 140 57

The context
ESB has explored multiple pathways to support long-term decarbonisation, including past assessments of carbon capture at Moneypoint and reserving space for future CCS integration at Carrington. In recent years, ESB has also participated in European research initiatives such as the Horizon EU "Realize" project. While renewables, storage and low-carbon fuels continue to drive ESB's primary decarbonisation strategy, emerging evidence shows that carbon neutrality will also require carbon removals. Research by MaREI indicates that Ireland will need 3–5 $MtCO_2eq$ of removals annually by 2050 to meet national climate goals.

At the same time, the voluntary carbon market has expanded rapidly, prompting new policy developments across the EU (CRCF), UK (GGR), and Ireland (CCS Taskforce). International utilities have begun exploring this space through dedicated entities, signalling rising interest in scalable carbon removal technologies. These developments required ESB to build a clear understanding of technology options and their potential role in the Irish energy system.

What we did
ESB conducted a comprehensive ranking study of negative emissions technologies. A cross-business working group defined the evaluation criteria, assessed options, and visited sites to understand more complex systems firsthand. The analysis found that afforestation and reforestation scored highest across all scenarios due to technological maturity and proven carbon removal potential. Other established solutions – such as bioenergy with carbon capture and storage (BECCS) in ethanol plants – also performed strongly. Emerging solutions, including direct air capture and biomethane pyrolysis, ranked lower due to early stage development and higher uncertainty.

The impact
The study has strengthened ESB's internal capability in carbon capture and removals, creating a robust knowledge base to assess future CCS proposals and inform strategic decision making. It highlighted the additional benefits of sustainable woodland management, leading to a new cross-business conversation on carbon accounting and opportunities for expanding forestry-related activities. The work also positions ESB to engage with emerging technologies and the evolving voluntary carbon market.

What we're doing next
ESB is now progressing actions informed by the study, including defining the future role of woodland management, exploring partnerships in the voluntary carbon market, and trialling low technology readiness level (TRL) carbon removal technologies. These solutions are viewed as complementary to ESB's core strategy of expanding renewable generation and storage capacity.

Metrics and policies

No relevant metrics and policies are currently available for this topical disclosure. We are in the process of reviewing our approach for future reporting.

Entity specific

Sustainable finance

Topical disclosure structure

Why this matters

Delivering net zero by 2040 requires sustained, long-term investment at scale. Access to sustainable finance is therefore a critical enabler of ESB's strategy, supporting the delivery of essential infrastructure while maintaining financial strength, affordability and resilience over the long term.

Sustainable finance aligns with the Financial Strength foundational capability of ESB's Net Zero by 2040 Strategy and supports our ability to attract capital aligned with our climate and sustainability ambitions. Sustainable finance reinforces transparency, accountability and alignment between sustainability performance and capital allocation. It also supports investor confidence and evolving regulatory expectations, including CSRD-aligned disclosures, by strengthening the link between strategy, performance and financing.

Our approach

ESB maintains a robust balance sheet and strong liquidity position, which underpin the financial resilience required to deliver our long-term strategic ambition. Preserving a strong investment-grade credit rating and securing optimal, long-term funding solutions remain core priorities, ensuring we can continue to invest in the infrastructure and technologies necessary to support the energy transition.

As part of our financing strategy, ESB leverages sustainable finance instruments, including our Green Bond Framework and Sustainability Linked Revolving Credit Facility (RCF), to fund delivery of our strategy. Green Bonds provide transparency and assurance to investors seeking to allocate capital to environmentally responsible projects, enabling them to directly support ESB's transition towards delivering reliable, affordable and low-carbon energy solutions for customers and communities.

Governance of sustainable finance is supported through a dedicated Green Finance Committee, which oversees compliance with the Green Bond Framework and the issuance process. The Committee reviews proposed projects against defined eligibility criteria and assesses alignment with EU Taxonomy requirements, including Do No Significant Harm and Minimum Safeguards. Through this disciplined and transparent approach, ESB demonstrates leadership in integrating sustainability into financing decisions while supporting long-term value creation and a credible transition to net zero.

Entity specific

Sustainable finance continued

Key to IROs
- Negative impact
- Positive impact
- Financial risk
- Financial opportunity

Timeframe
- S Short term
- M Medium term
- L Long term

Value chain location
- U Upstream
- O Own operations
- D Downstream

Material impacts, risks and opportunities

Own operations

Business operations

Stakeholders affected (H) Investors

Read more about **Strategic objectives** and **Foundational capabilities** on page 17

Material IRO	Strategic objectives/ foundational capabilities	Time-frame	Location in value chain
Sustainability matters: 24 Sustainable finance			
58 **Opportunities created through sustainable financing instruments** – use of financial instruments such as green bonds and sustainability-linked loans can lead to lower costs of finance		S	O

Entity specific

Sustainable finance continued

Material impacts, risks and opportunities continued

As part of our DMA, we have identified impacts, risks, and opportunities (IROs) that are material to our business, relating to sustainable finance. Further information on our materiality assessment methodology is provided in the Sustainability in Context chapter on pages 20–21. The outcomes of this assessment are detailed in the table on the previous page.

Targets

ESB is currently considering whether there is an appropriate specific target in relation to sustainable finance. However, some of ESB's existing financing arrangements include ESG targets, for example our €2.4 billion Sustainability Linked RCF entered into in July 2025 and a number of green bonds issued under our ICMA aligned Green Bond Frameworks.

CASE STUDY

Sustainability Linked RCF

IROs
See page 146 58

The context
In February 2020, we advanced our sustainable finance journey by signing a €1.4 billion five-year Sustainability Linked Loan (SLL), becoming the first Irish utility to adopt this innovative structure. Arranged with a syndicate of 14 international banks, the SLL refinanced our existing revolving credit facility and built on the success of the company's inaugural Green Bond issued in 2019.

What we did
In 2025, we further strengthened our commitment to sustainable financing by securing a €2.4 billion syndicated Sustainability Linked RCF with 15 international banks. This new five-year facility replaced the 2020 arrangement and reflects the scale of investment required to deliver ESB's Net Zero by 2040 strategy. The increased facility enhances our financial flexibility to support a significant capital programme focused on decarbonisation and the energy transition.

The updated RCF incorporates expanded sustainability linked targets covering Scope 1, 2 and 3 emissions reductions, the proportion of capital investment aligned with the EU Taxonomy, and gender diversity metrics, reinforcing ESB's commitment to social as well as environmental progress. The facility matures in July 2030, with options to extend to July 2032, providing long-term funding certainty for ESB's strategic objectives.

The impact
A Sustainability Linked RCF strengthens ESB's financial flexibility while directly tying the cost of liquidity to the achievement of key ESG targets, including decarbonisation, EU Taxonomy-aligned investment, and gender diversity. The inclusion of these ESG targets has brought increased senior management focus on the delivery of these metrics.

What we're doing next
This Sustainability Linked RCF is a five-year agreement with the option to extend by a further two years, which will enable ongoing focus on these ESG target and engagement with our banking partners.

Entity specific

Sustainable finance continued

Actions

As part of our financing strategy, ESB leverages sustainable finance instruments, including our Green Bond Framework and Sustainability Linked RCF, to fund delivery of our strategy.

IRO		Key actions taken	Future actions
58	**Opportunities created through sustainable financing instruments** – use of financial instruments such as green bonds and sustainability-linked loans can lead to lower costs of finance	Entered into a new Sustainability Linked RCF in 2025. Significant engagement across the Group on identifying and selection of ambitious ESG targets for inclusion in the RCF.	Continue to improve on quality and transparency of ESG information to external stakeholders.
		Established a Green Bond Framework in 2019 and updated in 2023.	Currently considering whether there is an appropriate specific target in relation to sustainable finance.
		Issuance of €1.7 billion of Green Bonds since 2019.	Currently evaluating the next evolution of the green bond framework.
		Publication of Green Bond allocation reports.	
		Green Finance Committee established in 2019 which meets periodically to consider sustainable finance activities.	

Entity specific

Sustainable finance continued

CASE STUDY

Green Bond Framework: Financing the transition, for future us

IROs
See page 146 58

The context
ESB has long demonstrated its commitment to financing projects that advance our ambition of achieving a net zero future. A major milestone was reached in 2019 when ESB published its first Green Bond Framework and, through ESB Finance DAC, issued Ireland's first ever corporate public Green Bond, a €500 million 1.125% fixed rate bond maturing in 2030. This was followed by a €200 million tap in 2020 and a further €500 million 1.0% 12-year Green Bond issued in 2022.

What we did
In 2023, ESB updated its Green Bond Framework to reflect evolving sustainable finance best practice, aligning eligible project categories with the EU Taxonomy and the latest ICMA Green Bond Principles. Under this updated framework, a €500 million 4.25% 12-year Green Bond was issued in September 2023.

By 31 December 2025, ESB had issued €1.7 billion in Green Bonds, with €1,689.6 million in net proceeds fully allocated by year end 2024. Funds supported renewable generation, smart metering, the BREEAM Excellent redevelopment of ESB's Head Office, and electric vehicle charging infrastructure, demonstrating clear progress toward ESB's sustainability objectives.

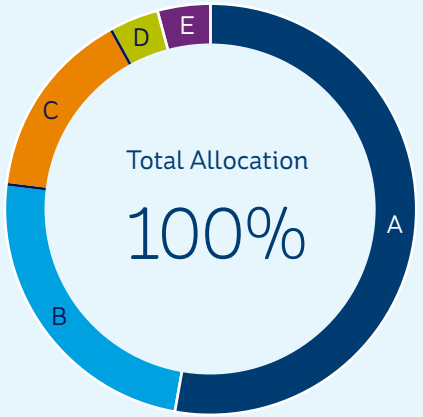
The impact
These green bond issuances marked ESB as a leader in sustainable finance within Ireland and set the foundation our sustainable financing ambitions.

What we're doing next
ESB is committed to our Green Bond programme and is starting to evaluate the next evolution of our green bond framework.

€1.7 billion

issued in Green Bonds by ESB by 31 December 2025

Total Allocation by Technology



A	Wind	53%
B	Smart meters	24%
C	Battery storage	15%
D	Solar	4%
E	Other	4%

Metrics

ESB currently does not have a specific target in relation to sustainable finance.

Policies

While ESB does not currently have a formal sustainable finance policy in place, we are actively considering whether such a policy should be developed to strengthen the governance and clarity of our sustainable finance activities. In this context, ESB's 2023 Green Bond Framework provides a relevant reference point, demonstrating ESB's approach to green financing.

Read more
Further information on ESB's Green Bond Framework and Green Bond Reports can be found in Green Financing here

Additional information

In this section

Environmental management

ESB recognises that its activities, comprising of electricity generation, transmission, distribution and supply, have the potential to cause environmental impacts and that it is the Group's responsibility to manage its activities in a manner that provides a high level of protection for the natural environment. ESB is committed to leadership in caring for the environment in which ESB's businesses operate and aims to minimise its impact on its surroundings.

ESB strives for excellence in all its activities to comply with all applicable laws and regulatory requirements. ESB maintains EMS certified to ISO14001:2015 standard throughout the Group to manage its environmental responsibilities and continuously improves environmental performance. They provide the governance framework for controlling impacts, emissions reduction, and pollution prevention, underpinned by robust compliance monitoring and reporting for its sites, which are licensed and permitted by the EPA, Northern Ireland Environment Agency, the UK Environment Agency and local authorities. This structured approach supports ESB's commitment to operating as a responsible, compliant, and environmentally sustainable energy utility.

Environmental Management responsibilities are managed and led by the respective Business Unit Environment Teams, Managers and Specialists. They are supported centrally by the Group Safety, Health and Environment (SHE) function, with oversight from the SHE Leadership team.

ESB operates several EMS certified to ISO 14001, with certifications held and managed by ESB Networks, Customer Solutions, Enterprise Services, Engineering & Major Projects, Generation Trading, and NIE Networks.

Business units track key environmental performance indicators including waste volumes and non-GHG emissions to air, ground and water.

Environmental incidents and near misses are monitored and reviewed using the Synergi Life platform. A new addition to Synergi Life in 2025 was the functionality for staff to log Environmental Good Catches on the platform, empowering staff to intervene where they encounter potential for an environmental issue to arise.

ESB Networks:
ESB Networks operate an ISO 14001-certified EMS and reports annually to the CRU on environmental performance. It successfully completed a full recertification audit under ISO 14001 during 2025. ESB Networks focuses on preventing pollution, protecting biodiversity, and managing key environmental risks, including SF6 gas, fluid-filled cables, creosoted poles, and hazardous waste streams. In 2025, ESB Networks continued to connect renewable energy, further progressed smart meter rollout, and implemented demand-side flexibility initiatives. ESB Networks applies the waste hierarchy to minimise waste and ensure compliant recycling and disposal. Looking ahead, ESB Networks remains committed to reducing greenhouse gas emissions, enhancing nature-positive outcomes, and delivering a net-zero-ready network by 2040.

Generation Trading
Generation Trading includes ESB's power generation assets including thermal, hydro, wind and solar across the island of Ireland and Great Britain. Each of ESB's thermal stations in Ireland holds an Industrial Emissions (IE) licence issued and strictly monitored by the EPA to control and prevent pollution. The EPA issues these licences to ensure that activities with potential to harm the environment are conducted in a way that protects human health and the environment by setting strict operating conditions, which are managed by and complied with in full by ESB.

The EPA also administer the EU's Emission Trading Scheme (ETS), for which each of ESB's thermal stations must maintain a greenhouse gas permit. Through the EU ETS, ESB's thermal stations must monitor, externally verify and submit their greenhouse gas emissions on an annual basis.

In addition, ESB Generation Trading holds several certified EMS in each of the thermal stations, and in the hydro, wind and solar areas.

ESB is also carefully managing the decommissioning and remediation of several former generation sites, ensuring that the environmental impacts of historical activity are dealt with in a structured and responsible manner.

Engineering & Major Projects (EMP)
EMP operates a certified ISO14001 EMS which includes the management of the environmental impacts of all infrastructure development projects it delivers on behalf of ESB Networks and ESB Generation Trading.

In addition, the Planning and Environmental teams within EMP comprise specialist environmental teams across the disciplines of spatial planning, environmental consenting and compliance, ecology, EMS, sustainability and environmental engineering. These teams provide a broad range of environmental services, which include environmental compliance, to infrastructure projects delivered by EMP and across ESB Group both on projects and on operational activities.

Customer Solutions
Customer Solutions operates and maintains an EMS certified to ISO 14001:2015 standard. The purpose of this EMS is to manage the environmental risks and impacts associated with the business activities, and to comply with the company's policy statement and legislative and regulatory requirements. Certification and continued registration for ISO 14001:2015 of the EMS facilitates the achievement of these goals.

Our management and staff are committed to the continuous improvement of an effective management system to enhance the environmental performance of our business.

The EMS applies to all activities performed by Customer Solutions that are within its control and those of its contractors. Our business activities at our locations, those delivered by our service partners and our contractors on our behalf are under scope of this certification across the three jurisdictions where we operate. Scope of the EMS includes Electric Ireland, ESB's Smart Energy Services, ESB eCars and ESB Telecoms.

Environmental management continued

Enterprise Services
Enterprise Services operates and maintains an EMS certified to ISO 14001:2015 standard. The EMS Scope includes ESB's award-winning head office, Fitzwilliam 27, and over 1,000 Enterprise Services staff across departments and teams that play a pivotal role in enabling ESB's strategic ambitions.

Energy Management and Performance
Energy Management and Performance ESB operates a Group-wide energy management system for its buildings and transport fleet, which is certified to ISO50001:2018. In Q4 2025, the system successfully underwent a surveillance audit, maintaining their certification. ESB and other public bodies are subject to energy reduction targets under the transposition of the EU Energy Efficiency Directive SI426/2014, with amendments setting 2030 targets of a further 50% energy efficiency improvement and a 51% reduction in absolute carbon emissions associated with operational energy use. ESB's energy performance continues to progress, with a 55% cumulative energy reduction against baseline performance reported by the SEAI, surpassing the Energy Efficiency improvement target several years ahead of 2030. The energy management system will be used to drive further savings and performance improvements towards the 2030 energy and carbon targets.

Access to Information on the Environment

ESB and ESB Networks DAC are separate public authorities under the European Communities (Access to Information on the Environment) Regulations 2014–2018 (the "AIE Regulations"). These regulations give members of the public the right to request environmental information held by or for ESB or ESB Networks DAC, promoting transparency and accountability. By providing access to information under AIE, ESB and ESB Networks DAC demonstrate their commitment to open communication and environmental responsibility.

AIE Requests 2025

	2025	
	ESB	ESB Networks DAC
New AIE requests	9	14
Requests brought forward from previous calendar year	1	1
Requests carried forward to next calendar year	0	2
Requests granted/part granted	7	7
Requests refused	2	2
Requests transferred	0	4
Requests withdrawn	1	0
Internal review requests	3	6
Requests appealed to Office of the Commissioner for Environmental Information OCEI	1	1

Glossary of terms

Commission for Regulation of Utilities (CRU)	The independent regulator of water and energy in the Republic of Ireland.
Corporate Sustainability Reporting Directive (CSRD)	A directive of the European Union which sets out the rules concerning the social and environmental information that companies report on.
Diversity, Equity and Inclusion (DEI)	Refers to ESB's commitment to building and sustaining a diverse workforce and fostering a culture of inclusion, equity and belonging. At ESB, DEI means: • Diversity: Recognising and celebrating the variety of backgrounds, identities and perspectives across the workforce • Equity: Ensuring fair access to opportunities, resources and career development, including targeted support initiatives to enable all employees to thrive • Inclusion: Creating a workplace where everyone feels respected, valued, connected, and able to contribute fully, supported by employee resource groups and community partnerships.
EirGrid	The electricity Transmission System Operator (TSO) for Ireland.
Energy for Generations Fund	A corporate responsibility initiative that sees up to €1 million per year disbursed across a range of community and issues-based initiatives.
European Financial Reporting Advisory Group (EFRAG)	A private association established in 2001, supported by the European Commission, to serve the public interest. It plays a dual role in strengthening EU corporate reporting by advising on the adoption of international financial reporting standards (IFRS) and developing European Sustainability Reporting Standards (ESRS).
Environmental, Social and Governance (ESG)	Refers to the impact that a company has on its employees, customers and communities in which it operates. ESG Reporting refers to the information or data provided relating to an organisation's environmental, social and governance performance.
European Sustainability Reporting Standards (ESRS)	EU-mandated disclosure rules requiring companies to report structured sustainability impacts, risks, and opportunities using double materiality.
EU Taxonomy	A classification system, establishing a list of environmentally sustainable economic activities. The EU Taxonomy provides appropriate definitions for which economic activities can be considered environmentally sustainable.
Electric vehicle (EV)	A vehicle powered entirely or primarily by electricity rather than a petrol or diesel internal combustion engine.
Gender Pay Gap (GPG)	The difference in the average hourly pay of men and women across a workforce.
Gigawatt (GW)	The amount of power equal to one billion watts.
Gigawatt Hours (GWh)	The amount of energy equivalent to delivering one billion watts of power for a period of one hour.
Great Britain (GB)	England, Scotland and Wales.
Green Bond Framework	The Green Bond Framework is a structured set of guidelines allowing ESB to issue green bonds to finance existing or future projects supporting the Net Zero by 2040 strategy, with a focus on a climate resilient economy and low-carbon electricity infrastructure.
Greenhouse Gas Emissions (GHG)	Any gas that has the property of absorbing infrared radiation (net heat energy) emitted from the earth's surface and reradiating it back to the earth's surface, thus contributing to the greenhouse effect.
ICMA	The International Capital Market Association.
Lost Time Injuries (LTIs)	A work-related injury causing an absence for one or more working days, counting from the day after the injury, before the person returns to normal or restricted work.
Megawatt (MW)	The amount of power equal to one million watts.

Glossary of terms continued

Megawatt Hours (MWh)	The amount of energy equivalent to delivering one million watts of power for a period of one hour.
Microgeneration	Small-scale renewable electricity generation.
Net Zero	Defined in line with the SBTi Net-Zero Standard which defines corporate net-zero as: • Reducing scope 1, 2, and 3 emissions to zero or a residual level consistent with reaching global net-zero emissions or at a sector level in eligible 1.5°C-aligned pathways; and • Permanently neutralising any residual emissions at the net-zero target year and any GHG emissions released into the atmosphere thereafter.
Price Review 6 (PR6)	Regulatory periods are of five years' duration and the Price Review 6 (PR6) covers the period 2026 to 2030 and sets out the total regulated allowed revenues over that period as determined by the CRU.
Return on Capital Employed (ROCE)	A financial performance metric used under the foundational capability Financial Strength in ESB's Driven to make a Difference: Net Zero by 2040 strategy.
Safe and Sound	An ESB culture change programme that will serve to build a world-class safety culture and environment that is sustainable over time.
Sustainable Development Goals (SDGs)	17 global goals established by the UN in 2015 as part of the 2030 Agenda for Sustainable Development.
Smart Energy Services	A complete energy management solution that brings all the skills and experience of a global energy innovator to businesses.
Smart Metering Programme	This programme is delivering the next generation of energy meter and replacing traditional electricity and gas meters. The smart meters will remove the need for a home visit to read the meter and therefore eliminate the need to use estimates whenever a meter cannot be read.
STEM (Science, Technology, Engineering and Mathematics)	An approach to learning and development that integrates the areas of science, technology, engineering and mathematics. STEM education supports children's capacity to understand and engage fully with the world around them.
Sustainable Energy Authority of Ireland (SEAI)	Ireland's national energy authority established under the Sustainable Energy Act, 2002.
Sustainability Linked Revolving Credit	A five-year syndicated sustainability linked revolving credit facility with a group of 15 international banks. The facility is in place to support the significant investment required to deliver ESB's Net Zero by 2040 strategy.
Synergi Life	A comprehensive environment, health and safety software platform designed to help organisations manage incidents, risks, audits, and quality processes through integrated reporting, analysis, and continuous improvement tools. The platform strengthens ESB's ability to systematically manage safety risks, incidents, and audits.
United Kingdom (UK)	England, Scotland, Wales and Northern Ireland.
Utility Regulator (UR)	The independent non-ministerial government department set-up to ensure the effective regulation of the electricity, gas and water and sewerage industries in Northern Ireland.
Value Chain (VC)	The value chain is the full range of activities, resources and relationships ESB uses or relies on to create its products or services, from conception through delivery, use and end-of-life, including its own operations and its upstream (suppliers) and downstream (customers, distributors) actors.

Glossary of terms continued

Corporate Sustainability Reporting Directive (CSRD): European Sustainability Reporting Standards (ESRS) glossary:

General Disclosures

BP-1 – General basis for preparation of sustainability statements

BP-2 – Disclosures in relation to specific circumstances

GOV-1 – The role of the administrative, management and supervisory bodies

GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

SBM-1 – Strategy, business model and value chain

SBM-2 – Interests and views of stakeholders

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

ES – Entity-specific disclosures

E1 – Climate change

E1-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

E1-1 – Transition plan for climate change mitigation

E1-2 – Policies related to climate change mitigation and adaptation

E1-3 – Actions and resources in relation to climate change policies

E1-4 – Targets related to climate change mitigation and adaptation

E1-5 – Energy consumption and mix

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

E4 – Biodiversity and ecosystems

E4 – SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

E4-2 – Policies related to biodiversity and ecosystems

E4-3 – Actions and resources in relation to biodiversity and ecosystems

E4-4 – Targets related to biodiversity and ecosystems

E4-5 – Impact metrics related to biodiversity and ecosystems change

E5 – Resource use and circular economy

E5-IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

E5-1 – Policies related to resource use and circular economy

E5-2 – Actions and resources in relation to resource use and circular economy

E5-3 – Targets related to resource use and circular economy

E5-4 – Resource inflows

S1 – Own workforce

S1-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

S1-1 – Policies related to own workforce

S1-2 – Processes for engaging with own workforce and workers' representatives about impacts

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S1-6 – Characteristics of the undertaking's employees

S1-8 – Collective bargaining coverage and social dialogue

S1-9 –Diversity metrics

S1-10 – Adequate wages

S1-14 – Health and safety metrics

S1-16 – Remuneration metrics (pay gap and total remuneration)

S1-17 – Incidents, complaints and severe human rights impacts

S2 – Workers in the value chain

Glossary of terms continued

S2 – SBM-2 – Interests and views of workers in the value chain as stakeholders

S2 – SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

S2 – 1 – Policies related to value chain workers

S2 – 2 – Processes for engaging with value chain workers about impacts

S2 – 3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2 – 4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action

S2 – 5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S3 – Affected communities

S3-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

S3 – 1 – Policies related to affected communities

S3 – 2 – Processes for engaging with affected communities about impacts

S3 – 3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

S3 – 4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

S3 – 5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S4 – Consumers and end-users

S4-SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

S4 – 1 – Policies related to consumers and end-users

S4 – 2 – Processes for engaging with consumers and end-users about impacts

S4 – 3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

S4 – 4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

S4 – 5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

G1 – Business conduct

G1-GOV-1 – The role of the administrative, supervisory and management bodies

G1 – 1 – Business conduct policies and corporate culture

G1 – 2 – Management of relationships with suppliers

G1 – 3 – Prevention and detection of corruption and bribery

G1 – 5 – Political influence and lobbying activities

Energy for generations

Delivering today for future us

ESB Head Office
27 Fitzwilliam Street Lower
Dublin 2
D02 KT92
Ireland

T: +353 1 676 5831
E: info@esb.ie

Find us online
X: @ESBGroup
LinkedIn: esb
Instagram: @theesbgroup
YouTube: ESBVideo
TikTok: @theesbgroup

www.esb.ie