



ESB Group Policy

Human Rights

ESB Group Policy on Human Rights

Policy Statement

At ESB, we respect all internationally recognised human rights including those rights set out in the International Bill of Human Rights and in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to implementing and enforcing effective measures in our operations, our supply chain, in the communities and locations in which ESB operates and throughout our value chain to ensure that human rights abuses are not taking place. Our commitment to respect human rights is founded on:

- UN Guiding Principles on Business and Human Rights, and
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

We commit to respecting fundamental worker rights set out by the ILO including:

- freedom of association and the right to collective bargaining,
- the elimination of forced labour,
- the abolition of child labour,
- the elimination of discrimination in employment and occupation,
- the right to a safe and healthy working environment.

ESB has a zero-tolerance approach to modern slavery and is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our respect for human rights aligns with our Sustainability Leadership Statement, which sets out our commitment of working to protect the rights of all people in our value chain. Our commitment is consistent with our values of being courageous, caring, driven and trusted. We work to embed respect for human rights throughout our business through our values and culture and through our Code of Ethics (Our Code). We understand how critical it is to conduct our business in a way that protects the dignity and wellbeing of every person impacted by our operations and through our value chain.

Our human rights commitment is supported by a range of policies and procedures including employee and worker rights, non-discrimination, diversity, equity, and inclusion, and prevention of modern slavery, human trafficking and forced labour. We inform our employees on human rights and encourage them to report any actual or potential abuse of human rights.

We encourage anyone who has a concern about human rights breaches in the context of ESB's business operations, to contact us via our confidential phone line or by emailing details to: gia@esb.ie We have a process in place to respond to concerns and investigate actual or potential adverse human rights impacts.

Through our human rights risk assessment process, we assess potential and actual impacts caused or contributed to by our own activities or linked to our activities through our business relationships. We take steps to prevent and mitigate any adverse impacts. We commit to remedying adverse human rights impacts caused or contributed to by our own activities.



Sinéad Kilkelly
Executive Director, People & Sustainability
12 July 2024

Assessing, Addressing and Reporting on Human Rights Risks

ESB is committed to an ongoing coordinated human rights due diligence process throughout ESB's value chain in line with best practice. Through this process we will engage with ESB's internal and external stakeholders to:

- Identify any potential and actual human rights impacts,
- Act upon the findings,
- Assign responsibility to ensure identified actions are implemented,
- Track ESB's performance on preventing and mitigating impacts,
- Communicate ESB's effort and progress on protecting human rights.

We report on key human rights issues impacting ESB and related actions to address, in ESB's Annual Report and in ESB's Sustainability Report, both of which are available on the ESB website at: www.esb.ie

Raising a Concern

We strongly encourage all parties including our employees, our contractors, external consultants, agents, third-party representatives, business partners, or members of the public to report concerns regarding any potential negative human rights impacts linked to ESB activities or in our value chain. Being courageous is one of our ESB Values, which supports our commitment to report any concerns we have.

Employees

In all situations, employees can report any concerns to their line manager or if for any reason they are not able to talk to their line manager, they can talk to someone in HR, a different line manager or Group Internal Audit.

There is also the ESB Confidential Helpline (contact details below). Everyone at ESB is encouraged to ask questions and raise concerns without fear of penalisation. There are many ways to report concerns but the most important thing of all is to speak up.

ESB's Whistleblowing and Protected Disclosure Policy sets out procedures for raising concerns and reporting wrongdoing. Our Anti-Bribery, Corruption and Fraud Policy also sets out relevant details.

Non-Employees

All others, including members of the public, can report any concern, issue or suspicion of human rights breaches including modern slavery and forced labour in our business or related supply chain by emailing full details to ESB Group Internal Audit Manager at gja@esb.ie or by contacting the ESB Confidential Helpline.

ESB Confidential Helpline

The Confidential Helpline is operated by an independent company separate from ESB and can be contacted on:

Call:

Ireland: 1800 812 740

UK: 0800 915 1571

Other jurisdictions: www.safecall.co.uk/freephone

Webmail:

Online: www.safecall.co.uk/clients/esb

Group Internal Audit

You can contact the ESB Group Internal Audit Manager on: gja@esb.ie

Remedy

We have a process in place to follow up on any human rights concerns raised. We take steps to prevent and mitigate any potential or actual human rights abuses in our value chain. We commit to address and remedy any adverse human rights impacts caused or contributed to by our own activities. We will report on our remediation actions as part of our human rights due diligence reporting.

Scope

This policy applies to all our employees, our board members, our contractors, our business partners, our suppliers, and businesses in our value chain.

For regulatory reasons, NIE Networks maintains its own company policies aligned, as far as practical, to ESB Group policies. For application of this policy to non-wholly owned subsidiaries, please refer to the Group Policy for Governance of Non-Wholly owned Entities.

Responsibility

Group Head of Sustainability, ESB has overarching responsibility for ensuring compliance with our human rights policy.

The Chief Procurement Officer is responsible for operating and maintaining internal audit systems designed to detect the occurrence of human rights abuses, including modern slavery, in our supply chains.

Prevention of Modern Slavery and Human Trafficking

ESB has zero-tolerance of modern slavery and human trafficking and is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains and expects the same standards from all its contractors, suppliers, and other business partners.

ESB fully complies with Irish legislation including The Criminal Law (Human Trafficking) Act 2008 and the Criminal Law (Human Trafficking) (Amendment) Act 2013.

As an organisation that operates in the United Kingdom, ESB fulfils its obligations under the UK Modern Slavery Act 2015 and is committed to preventing modern slavery in all its forms. ESB Group Policy on Modern Slavery is available on ESB's website at: [Corporate Codes and Group Policies \(esb.ie\)](https://www.esb.ie/corporate-codes-and-group-policies)

In accordance with the requirements of UK Modern Slavery Act, ESB reports annually on actions taken during the year to prevent acts of modern slavery from occurring within its supply chains. ESB's annual Statement on the Prevention of Slavery and Human Trafficking is available on ESB's website: [Corporate Codes and Group Policies \(esb.ie\)](https://www.esb.ie/corporate-codes-and-group-policies)

Related Policies

Related ESB Policies include:

- Our Code
- Respect and Dignity of the Individual
- Health, Safety and Wellbeing Policy
- Modern Slavery Policy
- Whistleblowing and Protected Disclosures Policy

Related Legislation & Guidelines

Related legislation and guidelines include:

- UN Guiding Principles on Business and Human Rights (2012)
- Irish Human Rights and Equality Commission Act (2014)
- International Bill of Human Rights
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- UK Modern Slavery Act 2015
- The Criminal Law (Human Trafficking) Act 2008
- Criminal Law (Human Trafficking) (Amendment) Act 2013
- Corporate Sustainability Reporting Directive (CSRD)