Energy for generations

ESB Group Policy on Lobbying & Political Engagements

Approved: Nov 2025

Version 5.0

Next review date: Q4 2028

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1. Introduction

Lobbying and political engagement ("Lobbying Activity") are essential parts of the democratic process and integral to ESB's broader stakeholder engagement. ESB engages directly and indirectly with regulators, legislators, and other public officials on a range of matters. This enables them to better understand our position on matters that are important for the energy sector, our customers, the communities we serve, and delivery of our strategy.

Some of these engagements are lobbying activities within the meaning of applicable legislation in the relevant jurisdictions where ESB conducts its activities.

2. Policy Purpose

The purpose of this policy is to ensure that all direct and indirect lobbying activity complies with our legal obligations in the jurisdictions in which we operate, is consistent with ESB's Business Code of Ethics "Our Code" and is aligned with ESB's Net Zero Strategy.

This policy should be read in conjunction with ESB Lobbying under the Regulation for Lobbying Act 2015 guidance document and ESB Competition Law manual. A list of designated public officials under the Regulation of Lobbying Act 2015 can be found in the lobbying guidance document.

3. Policy Scope

This policy applies to Board members, Executive/Managing Directors and all employees (or those acting on their behalf) in ESB Group directly and indirectly involved in Lobbying Activity or engaging third parties to lobby on behalf of ESB Group.

For regulatory reasons, NIE Networks maintains its own company policies in respect of lobbying, aligned, as far as practical, to this policy.

For application of ESB policies to non-wholly owned subsidiaries, please refer to the Group Guidelines for Governance of Non-Wholly Owned Entities. These guidelines require non-wholly owned subsidiaries to adopt policies and/or otherwise conduct their affairs in a manner consistent with the spirit of this Policy.

4. Responsible Lobbying Framework

ESB seeks to operate to the Responsible Lobbying Framework, which comprises the below five pillars:

Legitimacy: That Lobbying Activity will consider the wider public interest, respecting the interests and needs of people, communities, and the environment.

Transparency: That all direct and intermediary lobbying activity will be complete and truthful and disclosed in an open manner.

Consistency: That all Lobbying Activity will be consistent with our strategy and Our Code, including that of Membership Organisations that ESB is party to.

Accountability: That there is adherence to all national and EU laws in the jurisdictions that ESB operates, and that any illegal or unethical activity is reported in line with our obligations.

Opportunity: That, where appropriate, ESB will seek to coordinate and align Lobbying Activities with other organisations where we identify areas that further the public interest and are of common concern.

5. Key Principles

- ESB shall remain politically neutral and does not, as a matter of policy, make donations to political parties. ESB works constructively with all parties on an equal basis.
- All representations and Lobbying Activity will be fair and balanced and in line with business objectives and the goals of ESB's Net Zero by 2040 strategy.
- ESB will only seek to be a member of Membership Organisations that align with ESB core values and business objectives.
- ESB will comply with all lobbying disclosure requirements in each jurisdiction in which it operates and carries out lobbying activities. ESB will comply with any cooling off period required under legislation for persons engaging in Lobbying Activity on behalf of the company.
- Only authorised personnel shall engage in Lobbying Activities or make representations to public officials on behalf of the company.
- No financial or in-kind contributions shall be made, or reciprocal arrangements entered into, as part of any lobbying or political engagement activity.

6. Membership Organisations

ESB participates in government, trade, business and industry associations and working groups ("Membership Organisations") that enable us to share industry insights, maintain important relationships within the energy sector, and extend our views that are important for the energy sector and delivery of our Net Zero strategy.

Any decision to join a Membership Organisation, should be based in the first instance on achieving the objectives set out in ESB's strategy and alignment to the values set out in Our Code. All memberships should be appropriately approved by the Business Unit Executive Director or their designated nominee / business unit Stakeholder Manager and notified to ESB's Public Affairs team.

Employees who participate in Membership Organisations should familiarise themselves with ESB Competition Law Manual and not disclose any commercially sensitive information relating to ESB. ESB employees should also abide by the internal rules and declarations laid down by the Member Organisation on which they serve.

Membership Organisations can have a diverse membership which could result in such a body lobbying for public policy that is at variance with ESB strategy and values. Where such concerns arise, this should be brought to the attention of the relevant Business Unit Executive Director or their designated nominee / business unit Stakeholder Manager.

It is the responsibility of the Membership Organisation to report any Lobbying Activity undertaken by their organisation to the relevant authority where required. Only Lobbying Activity undertaken by or on behalf of ESB needs to be reported through the ESB lobbying process.

7. Roles and Responsibilities

Business Unit Executive Directors are responsible for approving Designated Lobbyist[1] who are authorised to lobby on behalf of their business area and informing them of their responsibilities.

All employees, in particular the Chairman of the Board, Executive Directors, Managing Director ESB Networks and other Designated Lobbyist, must comply with this policy and supporting procedures and submit all relevant returns to Group Compliance.

ESB Group Compliance promotes the objectives of this policy, provides support and guidance and is responsible for overseeing compliance with the applicable legal obligations in the jurisdiction is which ESB conducts its business.

8. Breaches

Failure to comply with laws, regulations and licences, including the laws relating to lobbying could damage the company's reputation and result in administrative fines or criminal sanctions for employees and the company. Failure to comply with this policy may result in disciplinary procedures being invoked.

9. Monitoring & Reporting

Monitoring compliance with ESB's legal obligations in the jurisdictions in which it operates is the responsibility of Group Compliance. Group Compliance report Lobbying Activities undertaken by ESB to the Standards in Public Office Commission (SIPO) in the Republic of Ireland and to the Scottish Parliament, as appropriate.

[1] Designated Lobbyist is an internal designation within the ESB organisation, to assist us in managing lobbying returns at a group level.

Group Compliance reports annually to the Customer, Innovation & Brand Board Sub-committee on ESB's Lobbying Activities and compliance in the jurisdictions in which ESB operates.

10. Related Policies & Guidelines

Please refer to the following which are available on the Hub under A-Z, policies:

- ESB Lobbying under the Regulation of Lobbying Act 2015 Guideline & Procedure
- ESB Competition Law Manual
- Our Code
- ESB Group Policy on Anti-Bribery, Anti-Corruption and Fraud
- ESB Group Policy on Whistleblowing & Protected Disclosures
- ESB Group Policy on Gifts & Corporate Hospitality