



Energy for
generations

THE WAY WE WORK AT ESB OUR CODE



Our Code: a quick guide	1
Message from Paddy	2
About Our Code	3
How do I make the right decisions?	8
Speak up	10
SECTION 1	
Our Personal and Business Integrity	11
Conflicts of Interest	12
Financial control	
Gifts and Entertainment	
Fraud, deception and dishonesty	13
Bribery and corruption	
Market Abuse	
Competition	14
SECTION 2	
Our people and working relationships	15
Health, safety and personal security	16
Human Rights	
Inclusion, respect and dignity	
Developing our people	17

SECTION 3	
Our assets and information	18
Company property and resources	19
Digital Systems	
Confidentiality	
Data privacy and personal information	20
External communication and social media	
Business records	
SECTION 4	
Our role in society	21
Environment	22
Relationship with customers	23
Relationship with suppliers and other business partners	
Government and political bodies	
Doing the right thing, together	24
Knowing, Understanding, Choosing	25



OUR CODE: A QUICK GUIDE

ESB's Code of Ethics, known as Our Code, sets out the principles and standards we must all adhere to in conducting our business. We can all benefit from following Our Code, not just to the letter but also in spirit, and helping each other to do the same.

All of the documents referred to in Our Code, as well as other documents that apply to the way we work at ESB, can be accessed online through the Hub employee intranet.

01 Use our values to guide our behaviours

At ESB, we believe that Our Values should clearly set out what we stand for as a company. ESB's values are to be Courageous, Caring, Driven and Trusted.

They are explained in our guide to The Way We Work – Our Values, and we use them to help us deliver the kind of service that will build on our existing reputation and help the company thrive.

02 Obey all laws and follow all policies and guidance

Following Our Code is in essence, about continually striving to work in a way that demonstrates honesty, loyalty, fairness and discretion: – that means always complying with the laws and regulations of Ireland and other countries where ESB operates, as well as following all policies, procedures and guidelines that relate to what you are doing.

03 Always act in the interests of ESB, your colleagues and everybody with whom we do business

When we live Our Code:

- We know what standards are expected of us, in whatever we are doing
- We understand what each of us must personally do to meet and reach beyond these standards
- We choose to take responsibility and do the right thing

Never do anything that would violate Our Code, and if you believe that a violation has occurred, immediately report it.

MESSAGE FROM PADDY

Our Code is a guide for everyone at ESB on how to behave as part of an ethical company. This means doing the right thing for society, for our customers and for one another.

Being an ethical company is grounded in the steps that each one of us takes every day to live our values and treat others with respect, whether or not anyone is looking - moments that show that we are courageous, caring, driven and deserving of the trust placed in us by our customers.

ESB's reputation and standing in society reflects the way that ESB employees and managers have collectively worked to create a brighter future for over 90 years. At the heart of this is the respect we hold for our customers and our colleagues, along with the numerous decisions and actions that have reflected Our Values over those 90 years. Through our history we have always held a long-term commitment to society that goes far beyond short term gain. This is the cultural legacy that we have inherited, and as Chief Executive, I am committed to creating the conditions for it to flourish and thrive into the future.

In this guide you will find the standards of behaviour expected of all of us at ESB. There is also guidance for specific situations where the right course of action may not be clear. However, it is ultimately up to each one of us to take responsibility for our own behaviours and those of our teams and consider how these either contribute to or detract from ESB's reputation and legacy.

ESB enjoys a very special position of trust in the communities we serve. As we go about our working day, we all have a responsibility to live up to this trust by calling out behaviours that don't align with our values and relentlessly asking the question, "are we doing the right thing?"



“
Being an ethical company is grounded in the steps that each one of us takes every day to live our values and treat others with respect.

—
Paddy Hayes
Chief Executive



ABOUT OUR CODE



WHO OUR CODE APPLIES TO

Who Our Code is for

Our Code is for the use of all employees of ESB, both permanent and temporary, in Ireland and overseas. Its principles also apply to people and organisations with whom ESB does business. We are committed to working solely with partners, contractors and third parties that have values and standards consistent with Our Code.

We are all responsible

The company's reputation as a trusted and responsible organisation is the responsibility of every one of us. By following Our Code, we all play a part in upholding and enhancing the respect ESB holds as a business and employer.

How managers provide guidance

As well as following Our Code, managers tell people about it, help everyone understand it and lead by example. They also ensure that guidance and training is made available and that any breaches are reported so that our high standards are maintained.

The role of ESB Board

The Board provides the leadership of the Group and, either directly or through the operation of Committees, applies independent judgement on matters of values, strategy, performance, resources and governance. The Board retains overall responsibility for ESB's governance framework, internal controls and risk management, including Our Code.

ESB's Ethics Committee

The ESB Ethics Committee ensures communication and awareness of Our Code across ESB, and proposes updates and revisions to Our Code. It reviews ethical issues organisation wide and considers what actions are needed to ensure that Our Code is adhered to.

WE ALWAYS, WE NEVER

We always

1. We always manage our finances carefully so that ESB maintains financial strength ensuring that we can deliver our ambitious strategy.
2. We always work to protect ourselves and others from risk at all times and support our colleagues in the delivery of their health and safety duties.
3. We always respect the human rights of everyone we come into contact with at ESB.
4. We always respect and protect the company's property and resources, and avoid using them for any improper purpose.
5. We always respect privacy rights and protect ESB's information, networks and products from cyber risks.
6. We always ensure our business records are complete, accurate and appropriately authorised
7. We always endeavor to work with and alongside companies who meet our standards and are aligned with our ways of working.
8. We always communicate with our stakeholders in a transparent way.
9. We always act responsibly, to protect the environment and climate, and to minimise any negative environmental and social impacts.
10. We always make sure that everyone in ESB is clear on what is expected of them, and has the opportunity to grow to their full potential.
11. We always deliver a professional, efficient service to our customers and make it easy for them to do business with us.

We never

1. We never do anything that will create a conflict of interest. It's the only way to ensure that all our decisions are made in the company's best interests.
2. We never accept or offer gifts or hospitality that could influence or be perceived as influencing a business decision.
3. We never defraud or deceive anyone, or act dishonestly, and we always protect the company against fraud.
4. We never tolerate bribery or corruption in any form.
5. We never use or share inside information about ESB (or any other company) for financial or other personal benefit.
6. We never disclose confidential company information to third parties unless required by law to do so.
7. We never damage the reputation of ESB through our own use of social media.
8. We never expose ESB's IT and digital systems to harm, so that we protect ESB's cybersecurity and the confidentiality of all company and personal data.
9. We never tolerate or engage in any activity that could lead to modern slavery.
10. We never compete unfairly or illegally in any market where we are active and never collude with competitors to fix prices, rig bids or share our customers, projects or territories.
11. We never penalise anyone disclosing instances of breach.

OUR CODE IN CONTEXT

Laws and Policies

All employees at ESB, along with our partners, contractors, suppliers and anyone else with whom we do business must respect and work within the laws of Ireland and any other country where we, or they, operate. Our Code reflects these laws as well as ESB's policies, standards and the regulations we follow. In particular, our Code should be viewed together with ESB's Anti-Bribery, Corruption and Fraud Policy and all the company's other governance and compliance policies.

Regulatory Excellence

We always comply with the laws and regulatory obligations that apply to ESB in Ireland and every market and country where we are working. In some cases, the laws of one country may apply to activities that take place outside of that country. This environment demands that every employee and leader be committed to regulatory excellence.

We know, understand and choose to comply with the laws, licences and regulatory requirements that affect our work. Regulators are treated professionally with courtesy, honesty and respect at all times. We coordinate with business or corporate experts when working with or responding to requests from regulators. And above all, we flag any potential regulatory breaches, through our line managers or the other reporting channels covered in the Speak Up section of Our Code

Ethics and Standards in Public Office

Some of us will be subject to the Ethics and Standards in Public Office legislation and must always take great care to follow it closely. That's why you may need to sign a confirmation to say that you have read and understood Our Code.

Quality

Today our company operates one of the world's most advanced electricity networks, delivering critical infrastructure to the economies we serve.

Our reputation drives our success. Since 1927 we have gained the trust of customers, shareholders, stakeholders, landowners and the public and each of us has a part to play in protecting that reputation and building on that trust.

We always:

- ensure that we represent ESB and our brands to the highest standards at all times. This includes how we speak, how we present ourselves, how we drive for business and how we use company tools and resources
- deliver the best possible customer experience by ensuring the quality of every customer interaction and the products and services we provide across our business areas
- require that all our business partners, including suppliers and contractors meet our working standards
- follow the quality management system that covers where we work in ESB



BREACHES OF OUR CODE ARE A SERIOUS MATTER

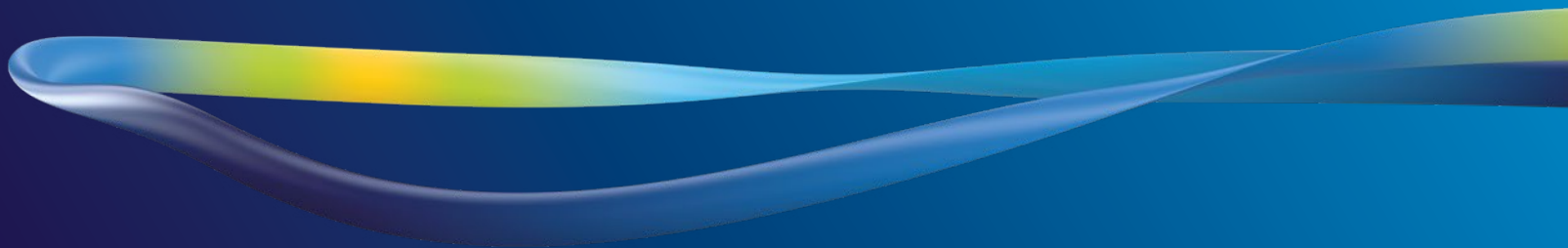
The trust of our customers is vital to us. It is important that we maintain this trust. If you are found guilty of breaching Our Code, you may face a disciplinary process in accordance with ESB's Disciplinary Procedures, and if you are found to have committed a violation, you will be penalised in such a way as to reflect on the seriousness of the offence, up to and including dismissal.

If a contractor, supplier, casual or agency worker breaches Our Code, we will report them to their employer and their contract may be terminated. ESB may also take action to recover any losses incurred as a result of the breach. Depending on the nature, ESB may be required to report to An Garda Síochána under the Criminal Justice Act 2011.

As a company, ESB complies with applicable trade restrictions, sanctions and various other legal and regulatory requirements set by recognised national and international authorities. If we don't follow these restrictions, sanctions and legal and regulatory requirements we face serious consequences which may lead to civil and/or criminal prosecution.



HOW DO I MAKE THE RIGHT DECISIONS?



HOW DO I MAKE THE RIGHT DECISIONS?

How can I be sure I'm doing the right thing?

Written standards like Our Code help us deal with issues that come up in our working lives. However, in a complex business like ours, it isn't possible to cover every situation that might happen. So, at times, we will have to use our own personal judgement.

Here you'll find some simple guidance to help get that judgement right.

What to keep in mind when taking action or making a decision:

- Our Values - we're courageous, caring, driven, and trusted
- The regulations, standards and laws that apply to that particular situation
- Policies, procedures and guidelines that relate to what you are doing
- How might your action affect:
 - our customers
 - our communities
 - our colleagues
 - our company
 - ourselves

So when faced with a choice or dilemma, think about the following:

- Does my action comply with regulations and laws?
- Is it in line with Our Values?
- Does it follow our policies?
- Does it follow procedures and guidelines?
- Does it set a good example to people with whom I work?
- Would I be happy with this if I were a customer or a member of our community?

If the answer to any of these questions is 'no', think again about what to say or do. Either talk to your manager or use ESB's reporting channels to speak up.

The phrases below are like red flashing lights.

Whether we say them ourselves or hear them from colleagues, we should take a moment to check if something wrong or illegal is happening:

No one will ever know.

Everyone else does it, so it must be OK.

Don't worry; it's the way we do things around here.

It doesn't matter how it gets done, just do it.

I don't want to know.

Speak Up

How do I speak up if I have concerns?

Being courageous is one of Our Values, which is why ESB expects us to report any concerns we have. Your line manager should be the first person you can turn to. If, for any reason, you're not able to talk to your line manager, there are other people that can help you, such as someone in HR, a different manager or Group Internal Auditor. Don't forget there is also the ESB Confidential Helpline (see contact details below).

Everyone at ESB should be able to ask questions and raise concerns without fear of penalisation. ESB will not tolerate penalisation, including bullying, intimidation, harassment, discrimination victimisation or disadvantage, of any person who reports a concern.

There are many ways to report your 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.

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:

+353 1 702 6049



SECTION 1 OUR PERSONAL AND BUSINESS INTEGRITY

Since we were established in 1927, millions of people have grown to trust ESB to provide vital services that affect many aspects of their lives. It's a big responsibility, but it's one we all welcome. By maintaining that trust and protecting our reputation, we all contribute to ESB's success.

OUR PERSONAL AND BUSINESS INTEGRITY

Conflicts of Interest

We never do anything that will create a conflict of interest. It's the best way to ensure that all our decisions are made in the company's best interests.

Conflicts of interest arise when our interests outside of ESB – whether family, business or personal – affect the way we carry out our functions within ESB. This can happen in many different ways, such as when we:

- are involved in activities that compete with ESB
- have a personal interest in business transactions involving ESB
- have family or friends who do business with ESB

For example, if you are involved in a tender process or a purchasing decision, and you feel like you might have a conflict of interest, you should notify the relevant Procurement Manager in writing. If the Procurement Manager then confirms that there is a conflict, you will be required to excuse yourself from the decision-making process.

Find out more in ESB's Policy on External Directorships of ESB Employees, ESB Group's Procurement Procedures, Disposal of IT Assets Policy, Policy on Appointment of External Legal Advisers, and Asset Disposal & Access to Infrastructure.

Financial Control

We always manage our finances carefully so that ESB maintains financial strength to support the delivery of our ambitious strategy.

We must follow our internal controls which keep ESB on course by promoting efficiency, reducing risk of asset loss, and helping to ensure the accuracy of financial statements and compliance with law and regulations. The Board, Senior Management and Financial Controllers are responsible for ensuring that we have an effective system of internal control operating across ESB and monitoring its effectiveness to provide reasonable assurance of compliance. All of us have a responsibility to implement and operate within our internal control framework and report any non-compliance issues.

Everybody has a responsibility for managing spend, regardless of the size of spend or method of procurement and we all have an obligation to seek value for money and to make saving where possible.

We must also ensure that we provide high-standards of internal services in an efficient manner, be accountable for the costs we have ownership of whilst driving cost reductions and ensure value for money across ESB.

Find out more in ESB's Internal Control Framework Policy, Internal Trading Policy, Group Policy for Corporate Procurement Credit Cards, Policy on benefit-in-kind, Guidelines for Internal Control over Financial Reporting, Policy on Contractual Limitations & Exclusion of Liability, JV Guidelines, ESB Group Procurement Guidelines and Risk Management Policy & Governance Framework

Gifts and Entertainment

We never accept or offer gifts or hospitality that could influence, or be perceived by others as influencing, a business decision.

Giving and receiving gifts and/or hospitality is recognised as an established and important part of doing business however it is important that this is limited, made for the right reason, legal, and is in line with our policies. For example, it can be customary at Christmas to exchange gifts of small value with suppliers and/or customers that we've dealt with during the year. Giving and receiving gifts of this type is acceptable provided they are unsolicited, infrequent, of low value (for example a bottle of wine), given openly and are recorded in line with ESB's Anti-bribery, Corruption and Fraud Policy.

Customer entertainment is also a feature of doing business, if it is limited in value, such as a meal at a local restaurant or a ticket to sporting event at a local venue. However, high value gifts, such as an offer of foreign flights and/or hotel bookings is not acceptable. If foreign travel is necessary in connection with your role, ESB will pay for the trip provided it is in line with our travel policy.

Remember:

- Never offer or accept any gift of cash or cash equivalents such as vouchers
- Particular care must be taken during a tender process when accepting any gift from a tenderer could be viewed as compromising our fair judgement
- If it's not practical to return a gift which is inappropriate, consider donating it to charity

Think carefully about how giving and/or receiving gifts or hospitality could be perceived by our stakeholders, competitors or customers.

Often the right answer is obvious but anyone in doubt should speak to their line manager.

Find out more in ESB's Anti-bribery, Corruption and Fraud Policy and our Group Policy for Corporate Procurement Credit Cards

OUR PERSONAL AND BUSINESS INTEGRITY

Fraud, deception and dishonesty

We never defraud or deceive anyone, or act dishonestly, and we always protect the company against fraud.

We will never seek to benefit from fraud, deception or false claims, or allow others to do so on our behalf. This includes defrauding or stealing from the company or any third party, and any kind of misappropriation of property. We all hold the trust of ESB, our partner organisations and our customers to make honest use of any funds, assets and properties that we are trusted to look after. Expense claims and working time records that we submit always accurately reflect our efforts on behalf of the company.

Find out more in ESB's Anti Bribery, Corruption and Fraud Policy, Group Sick Leave Policy, our Group Travel and Subsistence Expenses Policy and our Group International Assignment Policy.

Bribery and corruption

We never tolerate bribery or corruption in any form.

We never offer or accept a bribe to win or keep business or play any part in other illegal activities. We recognise that ESB's reputation can be harmed if it looks like we are doing the wrong thing.

Find out more in ESB's Anti Bribery, Corruption and Fraud Policy, IT Copyright Compliance Policy, and Guidelines for Managers on Managing Incidents of Fraud.

Market abuse

We never use or share inside information about ESB (or any other company) for financial or other personal benefit.

The law prohibits us, either in a personal capacity or on behalf of ESB, from using non public inside information to engage in transactions in listed securities, including bonds issued by ESB, financial instruments (assets that can be traded) and wholesale energy products.

Inside information means:

- precise information,
- that has not been made public,
- that relates directly or indirectly to ESB Group or relevant products,
- and that, once made public, could affect prices relating to ESB Group securities or those relevant products.

ESB's Group Policy on Market Abuse and Securities Dealing requires that we never share or use any non-public information for financial or other personal benefit.

All of us have a responsibility to follow rules about insider trading. The rules also apply when other people take action based on inside information we provide and may still apply even after we leave ESB.

In summary:

- be informed about ESB's policy on Market Abuse and Securities Dealing
- be aware of the risks
- be responsible and ask for advice if you need it

Find out more in ESB's Group Policy on Market Abuse & Securities Dealing.

OUR PERSONAL AND BUSINESS INTEGRITY

Competition

We never compete unfairly or illegally in any market where we are active and never collude with competitors to fix prices, rig bids or share our customers, projects or territories.

We never enter into any agreement with competitors that may prevent customers from being able to choose our competitors to get the best deal.

ESB believes in a healthy rivalry with our competitors and supports a free, open, competitive marketplace. Any of us that are involved in competitive markets and business development must be familiar with the relevant laws and customs of the countries where we do business and follow the guidance set out in ESB's Competition Law Manual.

We all want to succeed, but our success must reflect our honest efforts within the law and in line with our purpose and values. In most countries, competition (or antitrust) laws regulate dealings with competitors, customers, distributors, trade associations and other third parties. Be aware that competition laws may also apply to activities taking place outside Ireland.

Any works, supplies and services that are bought-in, should be fairly chosen through an open and competitive tender in line with with ESB Group's Procurement Guidelines. Purchasing/Procurement within the ESB Group is governed by ESB purchasing procedures (which reflect EU and Irish procurement laws).

You must disclose any actual or potential conflict of interest that may arise in the course of your purchasing responsibilities. If this situation arises you must remove yourself from any further involvement in the purchasing decision.

Find out more in ESB Group's Procurement Guidelines and ESB's Competition Law Compliance Manual.



SECTION 2 OUR PEOPLE AND WORKING RELATIONSHIPS

We work together to serve the public, our customers and communities every day and know many of them as friends, colleagues and acquaintances. By continuing to care for them, and each other, and have the courage to always keep people's best interests at heart, we can ensure the whole company keeps their respect.



OUR PEOPLE AND WORKING RELATIONSHIPS

Health, safety and personal security

We always work to protect ourselves and others from risk at all times and support our colleagues in the delivery of their health and safety duties.

At ESB our approach to safety, like everything else we do, is driven by our values. Every one of us should maintain our own personal safety and the safety of our colleagues, customers, the public and others who may be affected by our activities. Each of us has responsibilities in maintaining a work environment where everyone goes home safe and well from work every day. When dealing with safety issues we always act in an open, honest and respectful way, reporting any breaches or unsafe situations as soon as possible. Being safe and looking out for each other's health, safety and wellbeing is at the core of how we work everyday.

Find out more in our Group Health and Safety Policy and ESB Safety Audit Policy.

Human Rights

We never tolerate modern slavery or human trafficking and never engage in any activity in breach of our Policy on Modern Slavery.

We recognise our responsibility to respect and promote international human rights standards in everything we do. ESB expects all partners, contractors and suppliers of goods, services or works – to the company or on behalf of the company – to perform their duties in an honest and ethical manner, within the law and with respect for everyone's human rights. We are committed to acting ethically in all of our business dealings and relationships, and will take all reasonable steps to ensure human trafficking and/or modern slavery is not happening anywhere in our business or in the organisations with whom we do business. We immediately report any incidents of modern slavery.

Find out more in ESB's Policy on Modern Slavery.

Inclusion, respect and dignity

We always respect the human rights of everyone we come into contact with at ESB.

At all times, everyone at ESB is committed to fairness in our business affairs and in dealing in a fair and respectful way with every person we interact with.

As well as being responsible for our own behaviour, we always take an inclusive and open-minded attitude with colleagues, customers and suppliers, treating everyone with courtesy and respect.

ESB is committed to a safe working environment for everyone - free from discrimination and harassment. We avoid discrimination or unfairly judging anyone because of gender, marital/civil status, family status, age, disability, sexual orientation, race, religion, or membership of the traveller community.

It is ESB's policy to have a fair and transparent recruitment process, where successful candidates are appointed on merit.

Find out more in ESB's Policy for the Respect and Dignity of the Individual in ESB, Equal Opportunities and Diversity Code of Practice, Policy on Cultural Diversity, Code of Practice for People with Disabilities, Group Resourcing Policy and our Policy on Official Languages Act.

OUR PEOPLE AND WORKING RELATIONSHIPS

Developing our people

We always make sure that everyone in ESB is clear on what is expected of them, and has the opportunity to grow to their full potential.

ESB is committed to enabling everyone at ESB to fulfil their potential and maximise their contribution to ESB's success, so that we can deliver a high standard of service to our customers. Managing performance has two essential parts; having clearly agreed goals which set out what is expected of employees, and developing employees to grow in capabilities relevant to their existing roles as well as planning for their future career within ESB.

Each employee and their manager have a shared responsibility for delivering individual high-performance, and ensuring their continuing professional development. ESB provides a range of development supports including professional coaching and mentoring.

ESB, through strategic talent management, also plans for new roles, skills and capabilities which have been identified as important to deliver our Brighter Future Strategy, and encourages and facilitate employees to move into roles in other parts of the organisation.

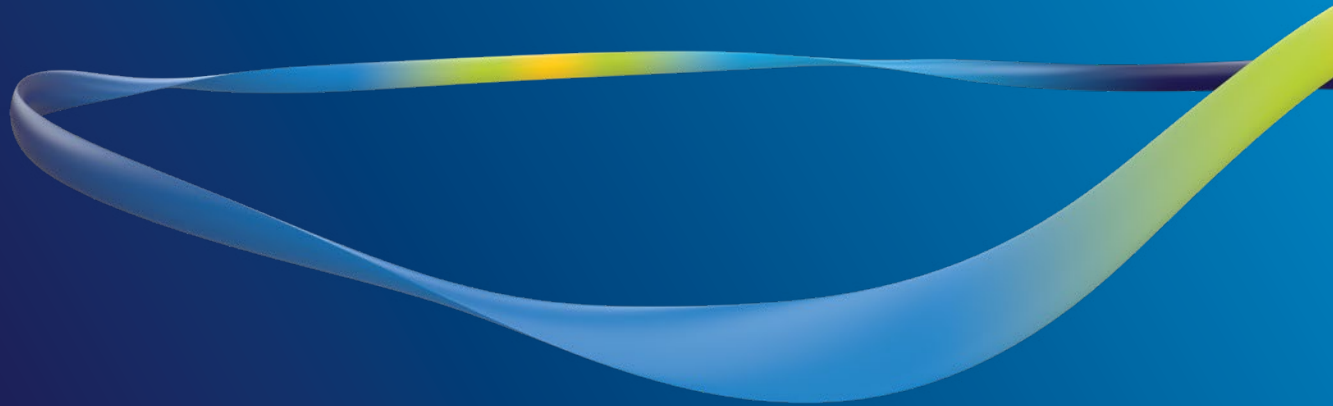
Find out more about the responsibility of individuals and managers in delivering high-performance and developing people in our Management Development Policy, ESB CPD Policy, ESB Coaching Policy and ESB Mentoring Policy.



SECTION 3

OUR ASSETS AND INFORMATION

During our working day, many of us will make use of company property or information. The care we take in looking after these assets and the level of trust that ESB places in us is an important responsibility.



OUR ASSETS AND INFORMATION

Company property and resources

We always respect and protect the company's property and resources, and avoid using them for any improper purpose.

Everyone at ESB is entrusted with company assets everyday. Some of these are physical items, such as tools, equipment, computer assets, phones, company money or facilities. Others are intangible such as data intellectual property, brand value or information. At times we may also be trusted with the property of other organisations, individuals or business partners.

We always make sure that we:

- only use ESB's assets in a way that is reasonable, appropriate and within the law, and never use, take, sell, lend, borrow or give away any of them without prior permission
- keep ESB's best interests in mind when spending company money or making financial commitments on the company's behalf
- always follow the local travel and expenses policy and show we can be trusted and responsible when submitting travel and expense claims, or approving those submitted by others
- respect the property and resources of other organisations and the property and resources of our business partners

Digital Systems

We never expose ESB's IT and Digital systems to harm, so that we protect ESB's cybersecurity and the confidentiality of all company and personal data

Nowadays very few of us can do our work without using digital systems, and we have policies and guidelines to ensure that we use these digital systems appropriately, to protect ESB and ourselves. We need to be particularly careful when using the internet and email, regardless of the device, so that we do not expose ESB to harm.

All of us at ESB use our digital IT systems for purposes that are within the law. Using our IT systems for personal use is allowed, provided it is used only occasionally and it does not interfere with business. All personal use must be appropriate and comply with our policies in this area. At any time, ESB reserves the right to revoke access to our IT systems.

Find out more in ESB's Policy on Cybersecurity, Internet Usage Policy, Email Usage Policy, Mobile Phone Policy, Cloud Usage Policy, Protection Against

Malware Policy, Remote Access to ESB's Corporate LAN Policy, Mobile Computing Storage Platforms and Devices Policy, Service Provider Access to ESB Systems Policy, User Access Management & User Authentication Policy, Desktop & Thin Client Security Policy, and our Print Management Policy.

Confidentiality

We never disclose confidential company information to third parties unless required by law to do so.

All ESB information that we come across while working in ESB should be treated as confidential. We must all comply with a range of legislation, including Data Protection and Freedom of Information legislation together with conditions set out in our regulatory licences, the ESB Networks Compliance Code of Conduct and ESB's own internal confidentiality arrangements.

Unless you are authorised to do so, you never disclose confidential information or commercially sensitive information about ESB's activities to any third party or, in the case of information relating to particular ESB business unit, to anyone in a different business unit in breach of business separation/ring fencing obligations. The obligation not to disclose confidential/commercially sensitive information remains even after leaving the company.

All ESB confidential and commercially sensitive information must be created and stored in accordance with ESB's Information Governance Policy.

We never acquire any information or business secrets by improper means. Any confidential information that comes into our possession (whether it is about ESB or not) will never be used for our own or anyone else's personal gain.

Find out more in ESB's Policy on External Directorships of ESB Employees, our Policy on Market Abuse and Securities Dealing and the ESB Networks Compliance Code of Conduct and our Policy On Fraud.

OUR ASSETS AND INFORMATION

Data privacy and personal information

We always respect privacy rights and protect ESB's information, networks and products from cyber risks.

In the course of our business some of us will hold or gain access to personal information about colleagues, customers, suppliers and other individuals. We always respect and protect this information and make sure we comply with applicable data privacy laws and ESB policies regarding the protection of personal data.

Any personal information which we hold, or which others collect, hold or process for us, or to which we have access, must only be used for the business purposes for which it was collected.

Sensitive personal information about a person's health, race, ethnic origin, political opinions, moral and religious beliefs, sexual life, trade union membership or criminal activity should be handled with particular care.

We always:

- ensure that anybody who provides personal information knows who will have access to their data and what we will do with the data
- consider data privacy law and whether a privacy impact assessment is required before starting any new activity involving personal information
- contact the Data Protection Officer for advice if you are unsure if you need to be collecting or processing personal data, or if you receive a request for access to personal data
- report any data breach immediately to the Data Protection Officer

Find out more in ESB's Corporate Policy on Data Protection and our Group Information Management Policy.

External communication and social media

We never set out to damage ESB's reputation

We never set out to damage ESB's reputation, through what we say in person or through our own social media channels. Everything we do or say, and everything said about us can positively or negatively impact on ESB's reputation.

While social media content can be both informative and engaging, it can also be damaging. Such content is instant, widely distributed, and permanent. Remember that your social media audience may be our stakeholders, including our customers, investors, commercial partners, the community and media.

Outside of work, anyone who makes comments on social media about the ESB, our brands, or any issue that relates to ESB, must make it clear that the opinions expressed are their own and not that of ESB's.

We must all take due care and attention before making comments and ask ourselves the following question: 'Could what I am saying have a negative impact on ESB, our brands, or our stakeholders?'

ESB's Corporate and Regulatory Affairs team manages all ESB owned social media channels, as well as handling all press queries, approving speaking engagements and appointing spokespeople. Communication with investors is managed by Corporate Finance. Always direct any queries to the appropriate team.

Find out more in ESB's Group Policy on Staff Engagement with Social Media and our Group Policy on Publishing to ESB Websites.

Business records

We always ensure our business records are complete, accurate and appropriately authorised.

We all have a responsibility to ensure that any records we create on behalf of ESB accurately represent the facts. We always report accurately on financial and non-financial information in order to meet our legal and regulatory obligations. Accurate reporting helps people within the company to make informed decisions about our business and helps us meet our responsibilities to shareholders, regulators and others.

Every ESB business and local operation needs to understand the financial control procedures that apply to them. If in doubt, check with your Line Manager or the Financial Controller for your business area.

SECTION 4

OUR ROLE IN SOCIETY

This is an exciting, transformational time for ESB. To thrive amid all the changes, we must approach each day with the energy, passion, persistence and drive needed to succeed and make a long-term difference for our customers, communities and colleagues.

OUR ROLE IN SOCIETY

Environment and Sustainability

We always act responsibly, to protect the environment and climate, and to minimise any negative environmental and social impacts.

ESB is committed to ambitious carbon reduction targets: in our generation business, our offices, IT systems, transport and in building a smart electricity network capable of connecting high levels of renewables generation. ESB respects our shared environment, including its biodiversity and the deep significance and meaning it holds for communities. Wherever we operate, we collaborate with those communities, customers, employees and suppliers.

We support the UN Sustainable Development Goals and our activities and projects observe UN principles for the wellbeing of local communities. We carefully consider the impact of any project on the environment and on the overall welfare of the communities we serve.

In all ESB's operations, we maintain and follow management systems, standards and procedures to avoid uncontrolled emissions to the air, water or soil and to improve our energy and resource efficiency. We manage and responsibly handle any waste materials. We speak up if something doesn't feel right as we carry out our work. Where an incident does happen, ESB will take appropriate remediation measures and will promptly alert the appropriate regulatory or other authorities as required.

Every year ESB lets our stakeholders know how we have performed on our carbon targets and our Environmental Social and Governance goals by publishing this information in accordance with international best practice.

Find out more in our Group Policy on Environment and Sustainability.



OUR ROLE IN SOCIETY

Relationships with customers

We will always provide a professional, efficient customer experience with accurate and timely communication whilst listening carefully and pro-actively responding to customer needs.

At ESB we have a long history of putting customers' needs at the heart of our business. Customer demands and expectations are increasing year on year, fueled by rapid advances in technology, developments in other industry sectors and increased competition within the energy sector.

Delivering an excellent customer experience is part of everyone's role not just those who interact directly with customers on a day to day basis. We aim to make every customer interaction a positive one, communicating clearly with our customers and making it easy for them to do business with us. The positive behaviours we espouse are aligned to our core values (being courageous, driven, caring and trusted) and form the foundation of every contact with our customers,

Guiding Behaviours - we promise to always be:

- Professional - respectful, competent, courteous and make our customers feel valued
- Accountable - take responsibility and see the job / customer issue through to completion, keep our promises and always act in a safe and ethical manner
- Helpful - listen carefully to customer needs, show empathy when required and make the whole experience easy and convenient regardless of how customers choose to interact with us
- Proactive - keeping customers advised and updated, being creative around issues which arise and seek out better ways of working

These guiding behaviours in every interaction will ensure we have a customer centered culture that ESB prides itself on and will continue to deliver benefits to our customers, communities and our business.

Relationships with suppliers and other business partners

We always endeavor to work with and alongside companies who meet our standards and are aligned with our ways of working.

We want to do business with partners who share our values. That's why we require all of our partners to adopt clear commitments on ethical business like those in Our Code.

Any organisation operating on ESB's behalf must ensure that their actions comply with Our Code and relevant policies. Any of us that have responsibility for a relationship with a business partner must make sure that their commitments meet our standards.

As a minimum, we expect our business partners to:

- comply with all relevant and applicable laws, regulations and industry standards
- be aware of Our Code and meet its principles within their own operations
- conduct their business in an ethical manner
- protect human rights and core labour standards
- value diversity and show a commitment to a fair working environment
- maintain a safe and healthy working environment
- protect the environment in their work and be actively committed to sustainability
- have zero tolerance for bribery and corruption in any form, including extortion and improper payments. They should also inform us of any connections with government officials
- avoid situations where a conflict of interest may occur and always disclose where a potential conflict exists
- proactively safeguard confidential and personal information. These are set out in our 'Requirements for Agents, Suppliers, Contractors, Advisors and other Third Parties' which form part of our contracts with third parties

Find out more in ESB's Group Policy & Procedure on Contractor Employment Standards, Policy and Procedure for Managing Agency Staff, ESB's Group Policy on Modern Slavery, ESB's requirements for Third Parties Documents and ESB's Outsourcing Guideline.

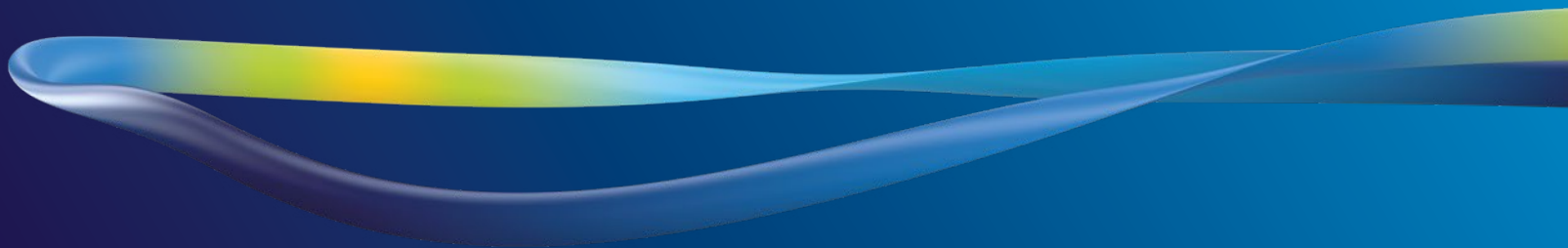
Government and political bodies

We always communicate with our stakeholders in a transparent way.

ESB follows the highest ethical standards in conducting business with politicians, Ministers and Government departments. When dealing with public representatives and officials, we are committed to being truthful, accurate and meeting all applicable laws, regulations and contractual terms and conditions, including legal obligations to report lobbying activities on behalf of ESB.

Find out more in our ESB-Lobbying-Policy-and-Procedure.

DOING THE RIGHT
THING, TOGETHER



DOING THE RIGHT THING, TOGETHER

The Way We Work at ESB is about knowing what is expected of each of us, understanding what that means for us and choosing to do the right thing.

Our Values, Our Code and our Group Policies help us understand and choose the right thing to do, as individuals and together.

Discover everything you need to know about The Way We Work at ESB on the Hub.



Knowing

I know

what standards are expected of me, in whatever I'm doing.

Understanding

I understand

what I personally must do to meet and reach beyond these standards.

Choosing

I choose

to take responsibility and do the right thing.

ESB Head Office

27 Fitzwilliam Street Lower
Dublin 2
D02 KT92
Ireland
T: +353 1 676 5831
E: info@esb.ie
www.esb.ie

ESB Confidential Helpline

The Confidential Helpline is operated by an independent company separate from ESB and can be contacted on:
1800 812 740 from Ireland
0800 915 1571 from UK
www.safecall.co.uk/clients/esb

All information in this edition of Our Code is correct at time of publication.
This edition published November 2022.

© ESB 2022

