

Electricity Supply Board
Statement on the Prevention of Modern Slavery and Human Trafficking 2024

Introduction

Electricity Supply Board (ESB) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

ESB is committed to ensuring that there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains and expects the same standards from all its contractors, suppliers and other business partners.

This is ESB's tenth statement on the prevention of slavery and human trafficking in response to the UK Modern Slavery Act 2015 ("the Act") and this statement sets out the steps taken by ESB during 2024 to prevent slavery and human trafficking in its business and supply chains.

This statement is made pursuant to Section 54 of the Act and constitutes the ESB statement for its financial year ended 31 December 2024.

ESB'S Business and Supply Chain

ESB is a vertically integrated utility whose business activities include the generation, transmission, distribution and supply of electricity in Ireland and the United Kingdom.

As the majority of ESB's operations are undertaken in the Republic of Ireland, Northern Ireland and Great Britain, ESB considers that the risk of modern slavery is more likely to arise in its supply chains rather than from its own business operations.

Excluding fuel, the company's annual procurement spend is approx. €2.2B with an active supply base of approx. 5000 vendors.

Further details of ESB business operations can be found at www.esb.ie

Steps Taken in 2024

ESB seeks at all times to comply with employment law applicable to the jurisdictions in which it operates and puts in place contractual arrangements with providers of agency staff requiring that they achieve the same level of compliance.

Following on from its previous statements on the prevention of modern slavery and human trafficking, ESB has during 2024 taken the following steps to prevent acts of modern slavery from occurring within its supply chain:

- During 2024, 91 Contractor Employment Standards audits were conducted on ESB managed sites throughout the Republic of Ireland.
- 4 onsite CSR audits were conducted during 2024 in locations including India, Poland and Tunisia.



- ESB undertook desktop-based audits to confirm minimum standards on a further 10 vendors in various locations around the world including China, Slovakia, Vietnam and Laos.
- ESB continue to engage with a third-party supply chain risk analysis organisation who provide regular risk updates on ESB's top suppliers by location and spend.
- ESB has updated its Modern Slavery policy, to include details of a confidential helpline which is now also available to all contractors and suppliers, external agents or any other non-employees working on behalf of ESB. Further, ESB updated its Human Rights policy in 2024.
- ESB continues to engage with our major coal suppliers to ensure that they are aware of ESB's commitment to the Bettercoal Organisation and the Bettercoal Code, including ESB's commitment to the use of Bettercoal tools in its due diligence and continuous improvement processes for the supply of coal. Mines are audited against the principles in the Bettercoal Code. The current version (2.0) of the Bettercoal Code incorporates the UN Guiding Principles on Business and Human Rights and the UN and International Labour Organisation's instruments on the rights of indigenous peoples.
- ESB continue to ensure that all tenderers were aware of and confirm compliance with ESB's Requirement for Third Parties policy which establishes clear contractual obligations on ESB's approach to Modern Slavery in Supply Chains.
- ESB continue to provide bespoke training to ESB Procurement teams on Modern Slavery risks. In 2024, 13 members of ESB's procurement team completed the Chartered Institute of Purchasing and Supply (CIPS) Practitioner Programme which includes training on ESG related issues.
- ESB are founding members of the Supply Chain Sustainability School which aims to raise awareness of sustainability in the construction and civil sectors. In 2024, the school has provided a number of workshops and training material aimed at identifying Modern Slavery in supply chains. ESB's procurement teams have participated in this training.

Mandatory training via ESB's online learning portal on ESB's Code of Conduct must be completed by all ESB employees. This training includes guidance on ethical business practices that apply to all ESB employees and contracting parties. Further details on ESB's Code of Ethics can be found here: [ESB Code of Ethics](#)

In addition, ESB's Human Rights Policy sets out company policy on human rights, spanning areas including health & safety, environment & sustainability, cultural diversity, equal opportunities & diversity, anti-bribery, corruption & fraud, whistleblowing and modern slavery. Further details of ESB's Modern Slavery Policy can be found here: [ESB Human Rights Policy](#)

ESB's Modern Slavery Policy was adopted by the ESB board in 2016 and updated in 2024. The policy continues to be communicated to all employees and all contractors and suppliers. This policy describes the actions that ESB will take to ensure the prevention of modern slavery, the roles and responsibilities from Board level down to each individual employee and the means by which any suspected incidences of modern slavery should be reported. Employees, contractors and suppliers are encouraged to report any suspected wrongdoing through a confidential helpline.

To understand how effective these controls are to ensure that modern slavery does not exist within our supply chain, external audits are conducted, where appropriate on the activities of

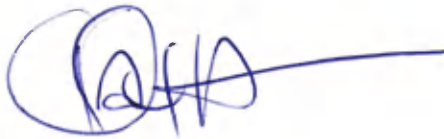


suppliers and contractors considered to operate in high-risk regions or industries. No incidents of modern slavery have been found to-date. The specific work outlined above will be complemented by a further programme of work for 2025.

APPROVAL

This statement was approved by the Board of Directors of ESB on 30th April 2025.

Signed by: Paddy Hayes.

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a series of loops and a long horizontal stroke extending to the right.

**Chief Executive,
Electricity Supply Board.**