



ESB Group Policy on Workers in the Value Chain

Approved by:	Executive Director, Enterprise Services
Policy Owner:	Chief Procurement Officer
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***Legal Oversight	Jamie Doddy
Communication Plan	Yes
Training Plan	Yes

1. Policy Details

1.1 Purpose of Policy

This policy aims to prevent opportunities for the occurrence of modern slavery and support the upholding of ethical labour practices within ESB's businesses and supply chains. ESB is committed to ensuring fair treatment and the existence of at least minimum employment standards for all workers involved in providing services to or on behalf of ESB.

1.2 Scope of Policy

This policy applies to all employees, workers (including agency and casual workers), officers and directors of ESB and all wholly owned ESB subsidiaries. This policy will apply to all contracts awarded by ESB to contractors, suppliers, representatives, advisors and any other Third Parties acting on behalf of ESB and contractors and suppliers of goods, works and services to any ESB Group company.

NIE Networks and SO Energy shall produce a policy that is consistent with the principles outlined in this document. Non-wholly owned entities shall, where appropriate, comply with the principles in this policy or produce a policy aligned with the principles of this policy and compliant with legislation in the jurisdiction in which the entity operates.

1.3 Definitions

Contractor(s): Any individual or organisation (including their personnel), including sub-contractors and their personnel of all tiers, including those otherwise engaged by a third party, providing goods, works and/or services to or on behalf of ESB in any jurisdiction.

Employment Standards: as described in Section 4 of the ESB policy entitled *Requirements for Agents, Suppliers, Contractors, Advisors and Other Third Parties Arising in Connection with ESB Policies* ("ESB's Requirements for Third Parties Policy")

Modern Slavery: has the meaning given to that term in the UK Modern Slavery Act 2015, encompassing servitude, forced or compulsory labour and human trafficking.

Supply Chain: The full range of activities and entities involved in producing and delivering ESB's products and services.

Third Party: means all persons (including sub-contractors) of all tiers and their employees employed or otherwise engaged by a third party in the provision of goods and/or Services to or on behalf of ESB in any jurisdiction, and "Third Parties" shall be construed accordingly.

1.4 Compliance Obligations

The policy aligns with all applicable Irish employment legislation, the Criminal Law (Human Trafficking) Act 2008, the UK Modern Slavery Act 2015 and all relevant ESB policies.

1.5 Key Policy Principles / Policy Statement

ESB maintains a zero-tolerance approach to Modern Slavery in all its forms, and unethical and illegal labour practices. ESB is committed to ensuring that there is transparency in our approach to tackling Modern Slavery and that there is a consistent approach to the management of Employment Standards within ESB's Supply Chain. This policy seeks to provide ESB with assurance that all Contractors, suppliers and Third Parties are aware of and committed to complying with all applicable legislation and maintaining the high standards expected by ESB.

In order to provide this assurance, ESB shall;

- Identify, monitor and continually assess those areas of our business and value chain most at risk from Modern Slavery.
- Incorporate Modern Slavery and Employment Standards compliance obligations as part of all contract award decisions and include explicit Employment Standards clauses in all contracts where applicable.
- Assess the compliance of all new and existing Contractors from the outset of our business relationship through the contract award process and on an ongoing basis throughout the lifecycle of the contract.
- Undertake compliance checks both desk-top based and onsite to ensure continuing compliance.
- Promote good employee and industrial relations on our sites, to work in partnership with ESB trade unions and to ensure any contractor on ESB owned sites respects the right of freedom of association.
- Provide training to employees to promote awareness of ESB's responsibilities and minimum acceptable standards in this area.
- Inform the appropriate authorities in the event that ESB establishes that a Contractor is in breach of any applicable Employment Standards or Modern Slavery legislation in any such jurisdiction in which such breach is believed to be occurring.
- Publish an annual statement outlining the measures undertaken to prevent occurrence of Modern Slavery within ESB's Supply Chain.
- Collaborate with recognised bodies to enhance transparency and raise standards along the Supply Chain.

2. Roles & Responsibilities

The **ESB Board** is responsible for approving the annual statement as required by the Modern Slavery Act 2015.

Each **Business Unit** within ESB is responsible for ensuring that Contractors performing contracts that have been awarded within the Business Unit are compliant with the principles of this policy during the lifecycle of the contract.

The **Chief Procurement Officer** is responsible for the effective implementation and ongoing compliance with this policy. The Chief Procurement Officer shall report material non-compliances of this policy through the quarterly attestation process. The Chief Procurement Officer will liaise with all internal stakeholders to ensure that appropriate resources are maintained to effectively manage the requirements set out in this policy and will prepare, annually, a draft Modern Slavery Statement for approval by the Board.

The **Group Head of Sustainability** is responsible for ensuring that the requirements set out in this policy are considered within ESB's social sustainability objectives.

All **ESB line** managers with responsibility for management of Contractors must;

- conduct business in a manner such that the opportunity for any incidence of Modern Slavery is prevented;
- avoid any activity that might lead to, or suggest, a breach of this policy; and
- report any suspected incidents of Modern Slavery to their line manager, Group Internal Audit, the Chief Procurement Officer or by contacting the confidential helpline.

3. Compliance

3.1 Monitoring

Compliance with this policy will be monitored by a nominee of the Chief Procurement Officer.

Any employee of ESB or ESB's Contractors, suppliers or Third Parties may report a suspected violation of this policy to their line manager (where applicable) or directly to ESB's confidential helpline at:

Ireland: 1800 812 740

UK: 08009151571

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

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

Contractors, their staff or in general members of the public can also email their concerns to ESB's Group Internal Audit Manager, gia@esb.ie

3.2 Non-Compliance and Sanctions

Any suspected breaches or non-compliances will be investigated by ESB or its representative. Non compliances shall be reported through the quarterly governance reporting process within each Business Unit. ESB will take all appropriate actions to resolve any non-compliances of this policy.

An employee or contractor involved in a wrongdoing in breach of this policy may face the following consequences:

- Any action in breach of this Policy by an employee is a disciplinary matter and may result in disciplinary procedures being invoked. This may result in penalties being imposed (up to and including dismissal).
- The commission of a wrongdoing by a contractor, casual or agency worker will be reported to the relevant person's employer and may result in the termination of the service contract with the contractor, contracting company, casual or agency worker. ESB may take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the employee / contractor and/or other individuals concerned.

4. Related Documents

This policy should be read in conjunction with the following documents;

- ESB Code of Ethics
- ESB Anti-Bribery, Corruption and Fraud Policy
- ESB Group Policy on Human Rights
- ESB Requirements for Third Parties Policy
- ESB Group Procurement Policy
- ESB Group Supplier Charter
- ESB Group Policy on Contingent Workers

Version History

Document Control, Review and Approval

Ver.	Date	Document Developer	Description of Change / Review	Approved by
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