

ESB POLICY ON MODERN SLAVERY

Revised May 2019

PURPOSE AND KEY PRINCIPLES

- 1.1 Modern slavery is a criminal offence under the UK Modern Slavery Act 2015 (the “**Act**”). The Act imposes obligations on organisations of a certain size which carry on a business in the United Kingdom. Modern slavery can occur in various forms, including servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. As the parent organisation of a number of subsidiary companies with significant operations in the UK (including NIE Networks Ltd., Coolkeeragh ESB Ltd. and Carrington Power Ltd.) ESB has adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term ‘modern slavery’ has the meaning given to that term in the Act.
- 1.2 This policy applies (a) to all employees, officers and directors of ESB and all ESB subsidiary companies and companies (b) to sales agents, vendors, contractors, representatives, advisors and other third parties acting on behalf of any ESB company and (c) to contractors and suppliers of goods and/or works or services to any ESB Group company¹.

POLICY STATEMENT

- 2.1 ESB has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and 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. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all of our contractors, suppliers and other business partners.
- 2.2 In summary:-
- We have a zero tolerance attitude to modern slavery.
 - We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.
 - We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

PREVENTION OF MODERN SLAVERY

- 3.1 In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall:
- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness, re-assessing at least biennially;
 - engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Act, at all times;

¹ A Policy consistent with the principles outlined in this Policy will be presented to the boards of NIE Networks and Coolkeeragh (and any other subsidiary company that is subject to the requirements of the Act in its own right) for adoption by each of those companies

- incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and, where appropriate, carry out an audit and/or investigation of the activities of those contractors, suppliers or business partners deemed high risk; and
- provide training to relevant employees to facilitate achievement of the objectives of this policy.

ROLES AND RESPONSIBILITIES

4.1 ESB management has overall responsibility for this policy. The key roles and responsibilities across ESB in relation to this policy are as follows:

Board

- Determination of corporate policy in respect of the UK Modern Slavery Act (i.e. this policy),
- supporting the ongoing implementation of this policy which may include regular review of the internal control framework and controls identified as being needed to drive compliance with this policy, and
- approving the annual statement required by the Act.

Management

- day-to-day operational responsibility for the implementation of this policy,
- allocating sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness,
- ensuring that all managers and other staff who may deal with concerns or investigations under this policy receive appropriate training,
- The Chief Procurement Officer is responsible for operating and maintaining internal control systems designed to prevent the occurrence of modern slavery in our supply chains, and
- The Executive Director People & Organisation Development is responsible for ensuring that appropriate internal control systems are in place to prevent the occurrence of modern slavery in the recruitment, selection and employment of employees or other persons engaged via agencies to provide services for ESB.

Employees (and third parties working for us or under our control)

- Conducting business in a manner such that the opportunity for any incidence of modern slavery is prevented
- Avoiding any activity that might lead to, or suggest, a breach of this policy.
- Reporting any suspected incidents of modern slavery.

REPORTING INCIDENTS

5.1 Employees

Employees are encouraged in the first instance to report any wrongdoing to their line manager, as they would any other concern in the course of their duties. Alternatively, ESB has made available a Confidential Helpline/ Web Facility which staff can use to report concerns arising in connection with this policy. This Helpline operates 24 hours a day, 7 days a week. The Helpline offers a safe, confidential and, if necessary, anonymous means of reporting wrongdoing for staff who may otherwise feel uncomfortable coming forward to their line manager. The Helpline/ Web Facility can be accessed by either of the following methods:

- By calling 1800-481-098 (international calls: 00353 1 7037201) at any time, or
- By completing an online report form at <https://esb.alertline.com>.

This Helpline/ Web Facility is managed and operated by an independent company separate from ESB. Callers to the Helpline will be asked by trained operators for details of their concerns. Similar questions are used in the web facility. At the end of the telephone interview or submission of an online report, a report number will be allocated to facilitate call back or subsequent access to the website to check for a response, or to facilitate the provision of additional information. The Group Internal Auditor receives reports from the Confidential Helpline/ Web Facility and will follow up as appropriate.

5.2 Non-employees

If contractors, external consultants, agents, third-party representatives, business partners working with us, or generally members of the public, have any concern, issue or suspicion of modern slavery in our business or related supply chain they should write with full details to the Company Secretary by emailing to marie.sinnott@esb.ie or by post to the Company Secretary, ESB, 27 Lower Fitzwilliam Street, Dublin 2.

POLICY VIOLATION

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

- The commission of a wrongdoing is a disciplinary matter, and any employee involved will be subject to the disciplinary procedures then in force and applying to the applicable employee, which may result in penalties being imposed on that employee (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.

AMENDMENTS

7.1 This policy may be revoked, replaced or changed at any time. Staff will be informed of any material changes made to the policy.

RELATED POLICIES AND PROCEDURES

Please refer to the following:

- [ESB Code of Ethics](#)
- [ESB Policy on Fraud and other Unlawful Activity](#)
- [ESB Policy on Respect and Dignity for the Individual](#)
- [Requirements for Agents, Suppliers, Contractors, Advisers and other Third Parties arising in connection with ESB Policies.](#)