

**Electricity Supply Board
Statement on the Prevention of Slavery and Human Trafficking – May 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 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 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 ninth 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 2023 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 2023.

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 the 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. €1.6B across approx. 4000 vendors.

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

STEPS TAKEN

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 slavery and human trafficking, ESB has, during 2023, taken the following steps to prevent acts of modern slavery from occurring within its supply chains:

- A desktop risk assessment of 180 suppliers was completed in collaboration with the British Standards Institute (BSI). These assessments reviewed each company's practices across a range of CSR related topics including:
 - company practices in relation to human rights,
 - child and young labour,
 - site conditions,
 - wage and benefits,
 - working hours, and
 - disciplinary practices.
- On completion of this assessment, 24 suppliers were deemed to have an "elevated" risk rating and 3 suppliers had a high-risk rating. Following further investigation, including 3 on-site audits, no significant issues were identified;
- An externally hosted AI-enabled Risk Analysis Tool was introduced in 2023, to further inform third-party risk assessments. This tool provides insights on third party risk including Labour Health & Safety, Labour Compensation, and Labour Rights and a further 45 Suppliers to-date have been assessed using this tool;
- 69 Contractor Employment Standards Audits were also conducted on ESB managed sites throughout the Republic of Ireland by ESB appointed third party auditors;
- ESB has long signalled its intention to cease burning coal at Moneypoint by the end of 2025 and is actively progressing plans to achieve that objective. Furthermore, ESB is now actively winding down its coal stocks at Moneypoint, with a target to fully use the existing stocks over the next 12-18 months. Notwithstanding this, ESB continues to be active in Bettercoal and 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;
- We continued to ensure that all tenderers and suppliers were aware of and signed-up to ESB's 3rd Party Requirements Document, which establishes clear contractual obligations on ESB's zero tolerance approach to Modern Slavery in our Supply Chains;
- During 2023, ESB became one of the 15 Founding Partners of the Irish Supply Chain Sustainability School. The school was formally launched on 24th January 2024 and will provide free of charge learning paths and supports, including guidance and training on the prevention of Modern Slavery in supply chains to ESB's supply chain partners and ESB Staff;
- ESB was assigned an B leadership rating for Supplier Engagement by the Carbon Disclosure Project (CDP) in 2023.

Mandatory training via ESB's online learning portal on ESB's Staff Employee Code of Ethics must be completed by all ESB staff. This training includes guidance on ethical business practices that apply to all ESB employees and contracting parties, click on the following link for further information [esb-our-code---september-2021.pdf](#)

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, see link for additional information [ESB Human Rights Policy](#)

ESB's Policy on Modern Slavery (available at www.esb.ie) which was adopted by the ESB Board in 2016 and updated in May 2019 continues to be communicated to all employees. This policy and its subsequent amendments detail 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 are encouraged to report any suspected wrongdoing, and ESB's Policies sets out the protections for employees in reporting serious malpractice at work.

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 considered to operate in high-risk regions or industries. No incidents of modern slavery have been found to-date.

The steps taken in 2023 to prevent incidences of modern slavery in ESB's supply chains will be complemented by a further programme of work in 2024.

APPROVAL

This statement was approved by the Board of Directors of ESB on 1st May 2024.

Signed by: Paddy Hayes

A handwritten signature in black ink, appearing to be 'P. Hayes', written over a horizontal line.

**Chief Executive,
Electricity Supply Board.**

15th May, 2024.