

Human Rights

ESB is committed to respecting all internationally recognised human rights including those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

This commitment is supported by a range of policies covering focus areas within human rights. The Employee Code of Ethics requires all employees to operate fairly and to respect all human rights.

ESB has assessed its business areas and locations to identify potential Human Rights issues and risks and preventive measures, both within the company and in other organisations that provide goods and services. This is presented below. We will regularly report on our progress in our annual Sustainability and Corporate Responsibility report.

Human Rights Assessment

The following is ESB’s assessment of human rights and equality issues it believes to be relevant to its functions and the policies, plans and actions in place or proposed to be put in place to address those issues. This assessment is published in compliance with Section 42 (s) of the Human Rights and Equality Act (2014). A wide range of policies has been developed covering human rights, including employee rights, non-discrimination, diversity and inclusion, as well as modern slavery. Our Code of Ethics covers the range of behaviours expected of employees in line with ESB values. Focus areas and the actions taken and planned are summarised in the table below.

Issue	Action
Human rights and equality issues affecting employees of ESB (and its subsidiary companies, including ESB Networks DAC)	A wide range of policies are in place, including: <ul style="list-style-type: none">• Cultural Diversity Policy• Group Procurement Policy• ESB Equal Opportunities and Diversity Code of Practice• Health and Safety Policy• Environmental Management and Sustainability Policy• Whistle Blowing and Protected Disclosures Policy• ESB Employee Code of Ethics (Our Code),• The Way We Work• Modern Slavery Policy• Anti-Bribery, Corruption and Fraud Policy• Ongoing awareness and training programmes relating to the above policies
Human rights and equality issues in joint venture companies	<ul style="list-style-type: none">• Guidelines for joint ventures adopted• Governance Framework adopted for each joined venture formed.
Human rights and equality issues affecting our contractors	<ul style="list-style-type: none">• Contractual provisions included in all contractor agreements requiring all contractors to comply with specific standards relating to employment laws, ethics, bribery and corruption, anti-slavery and human trafficking, sanctions and related matters.• Contractor audits conducted by an independent third party

Human rights and equality issues arising in our supply lines

- ESB Supplier Charter adopted, setting out standards required of all suppliers.
- Supplier contracts include contractual provisions requiring all suppliers (as well as agents) to comply with specific standards relating to employment laws, ethics, bribery and corruption, anti-slavery and human trafficking, sanctions and related matters.
- Procurement of screening and audit service
- Financial standing of suppliers checked every year.
- Member of the Bettercoal organisation, a not-for-profit organisation that works towards responsible coal supply

ESB will report regularly on these measures in its Annual Report and Annual Sustainability and Corporate Social Responsibility Reports.

This assessment is published in compliance with ESB's obligations under Section 42 of the Irish Human Rights and Equality Commission Act 2014

[Modern Slavery

Modern Slavery is a criminal offence under the UK Modern Slavery Act 2015. 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 of a number of subsidiary companies with significant operations in the UK, ESB has adopted a Policy on Modern Slavery with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In accordance with the Act, ESB publishes an Annual Statement setting out the steps that ESB has taken during the previous financial year to ensure that slavery and human trafficking is not operating within either its own business or its supply chains. ESB carries out risk screening of its suppliers and, based on this, a number of site-based supplier audits are performed. The most recent Annual Statement on the Prevention of Slavery and Human Trafficking was published in May 2020 and is available on the ESB website, www.esb.ie.§