

Modern Slavery & Human Trafficking Statement

2023



Introduction

EirGrid Group operates and develops the electricity system in Ireland (EirGrid) and Northern Ireland (SONI Ltd). Our primary role is to operate, develop and enhance the all-island power system and the wholesale electricity market.

EirGrid Group's revenue is primarily derived from regulated tariffs. The main revenue is the Transmission Use of System (TUoS) tariff which is a charge payable by all users of the transmission systems in Ireland (EirGrid) and Northern Ireland (SONI Ltd.). The turnover from our licenced activities for the year ending 30th September 2022 was as follows:

| | EirGrid TSO €'000 | SEMO €'000 | SEMOpX €'000 | SONI TSO €'000 | EWIC €'000 | Eliminations | Total €'000 |
|-------------------------------|----------------------|---------------|-----------------|-------------------|---------------|--------------|----------------|
| Income Statement Items | | | | | | | |
| Segment Revenue | 658,150 | 21,069 | 4,371 | 143,804 | 83,180 | (48,951) | 861,623 |

This is EirGrid Group's Modern Slavery & Human Trafficking Statement setting out the steps taken to combat modern slavery in our business and supply chains in accordance with the UK Modern Slavery Act 2015.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes EirGrid Group's statement for the financial year ending 30 September 2022.

This statement is made by and on behalf of EirGrid Group.

Approach

The Board, the Chief Executive and the Executive Team are committed to upholding and respecting all aspects of human rights including ensuring that slavery and human trafficking is not taking place in our business or any of our supply chains. Our approach is summarised as follows:



Policies

We have a range of Group policies and procedures embedded within the organisation which relate to how we do business, specifically:

- Our “**Values & Behaviours**” articulate the core values we hold as a business and the behaviours we expect all employees and contractors to portray in delivering these values including transparency and acting with integrity;
- Employee and Director **Codes of Conduct** incorporate specific commitments to human rights, zero-tolerance of unethical practices within the Company and those organisations we work with and zero-tolerance of any form of bribery or corruption; and
- **Protected Disclosures Policy** (Whistleblowing) provides guidance to our workforce and encourages and sets out our expectation for employees and others to report any concerns relating to a wrongdoing in the workplace and elsewhere in relation to EirGrid’s operations. EirGrid shall not tolerate any employee being discriminated against or suffering any detriment as a result of raising a concern.



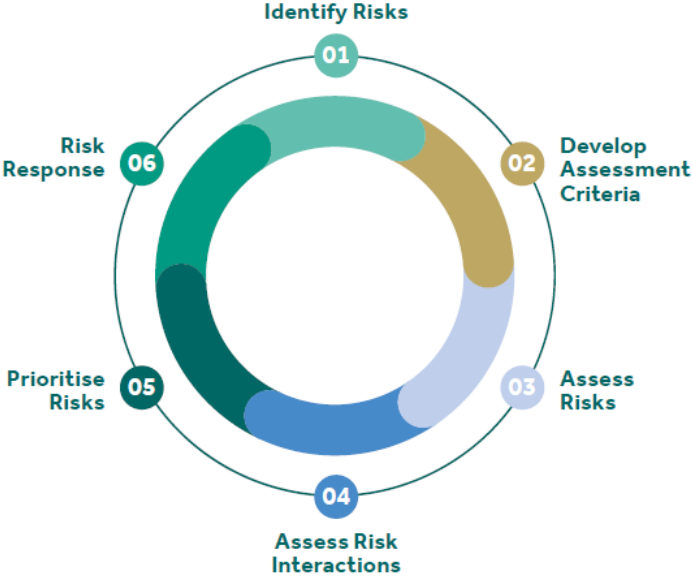
Due Diligence

- During the year we performed a **risk assessment review** of our key suppliers in both EirGrid and SONI Ltd by value based on both geographical area and information available on their approach to modern slavery/human trafficking to ensure that controls are in place and to understand how effective these controls are to ensure that modern slavery does not exist within EirGrid Group's supply chain.
- Developed a modern slavery **awareness training module** for employees.
- Incorporated Modern Slavery/Human Trafficking obligations and red flags within our **Anti-Bribery & Corruption Policy**.
- **Group Procurement Procedures** requiring “that all suppliers who participate in a formal tender process adhere to all statutory obligations under current Occupational Health & Safety, Environmental Management, Employment and Equality Legislation and the Modern Slavery Act”.
- **Supplier Terms & Conditions** which require all suppliers of goods and services to demonstrate compliance with governing laws, anti-bribery and anti-corruption regulations.

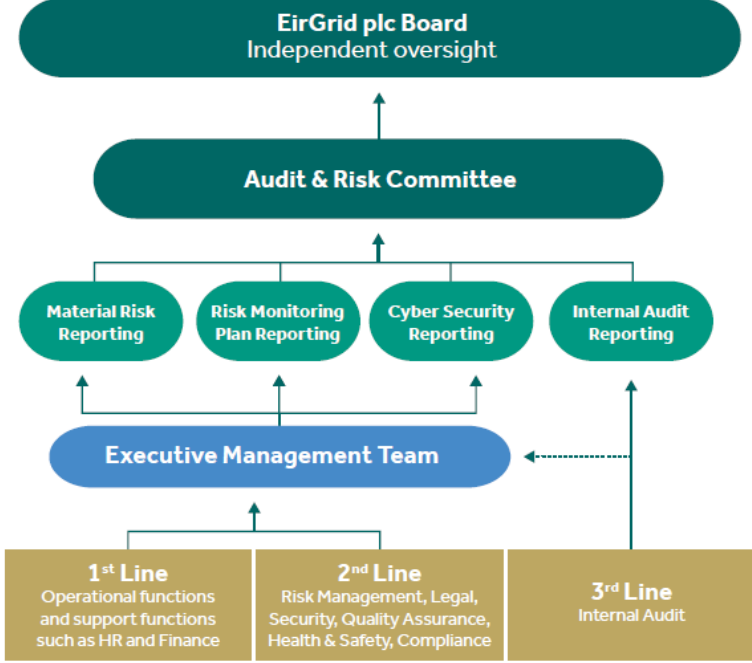


Risk Management & Review

Continued application of the **Group Risk Management Framework** to continually identify, assess and respond to any risks associated with slavery/human trafficking and continue to assess the risk environment to ensure our controls remain fit for purpose.



Ongoing review of the application of the above policies and procedures is performed via our three lines of defence model.



Continuous Improvement

We shall continue to promote awareness of our responsibility through the application of the above policies and processes and the provision of relevant training and guidance to our employees. In addition we intend to take the following steps in 2023 to further enhance our commitment to combatting modern slavery:

- Continue to monitor our **key suppliers** in both EirGrid and SONI Ltd to ensure that controls are in place and to understand how effective these controls are to ensure that modern slavery does not exist within EirGrid Group's supply chain.
- Perform a **focused risk-based review** of a sample of key suppliers to EirGrid and SONI Ltd on their approach to modern slavery/human trafficking.
- Deliver **awareness and refresher training** to all employees.

This statement was approved by the Board of Directors of on 19th April 2023.

Mark Foley (on behalf of the Board)

Chief Executive

19th April 2023

