

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 consists of several licenced activities. As the transmission system operator (TSO) our activities in Ireland and Northern Ireland are regulated by the Commission for Regulation of Utilities (CRU) and the Utility Regulator (UR) respectively. The Group also holds two licences as Interconnector Operator, one from the CRU and one from the Office of Gas and Electricity Markets (Ofgem) in the UK. In addition, EirGrid Group via a contractual joint venture between EirGrid and SONI act as Single Electricity Market Operator (SEMO) for the all-island Single Electricity Market (SEM).

EirGrid Group is required to publish an annual Modern Slavery & Human Trafficking Statement presenting the measures taken to combat modern slavery in our business and supply chains in line with the UK Modern Slavery Act 2015.

Our Business

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 2020 was as follows:

Income Statement items	EirGrid TSO € '000	SEMO € '000	SEMO px € '000	SONI TSO € '000	EWIC € '000
Segment revenue	533,033	14,236	4,143	115,879	69,747

All of EirGrid Group's operations and its employees are based in Ireland (EirGrid) and Northern Ireland (SONI Ltd.). As all of our business is undertaken within Ireland and Northern Ireland, EirGrid Group would consider that we and the majority of our suppliers are operating within industries with a low risk of modern slavery/human trafficking.

Policies

We have a range of 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 EirGrid and SONI Ltd. or those organisations we work with and zero-tolerance of any form of bribery or corruption; and
- **Protected Disclosures Policy** (Whistleblowing) which provides guidance to our workforce and encourages and expects employees and others to report concerns relating to a wrongdoing in the workplace and elsewhere relating to EirGrid's and SONI Ltd.'s operations. EirGrid and SONI Ltd. shall not tolerate any employee being discriminated against or suffering any detriment as a result of raising a concern.

Due Diligence

- **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"; and
- **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

The application of a **Group Risk Management Framework** to identify and assess all risks including slavery and human-trafficking operates on an ongoing basis.

Review & Management

Ongoing review of the application of the above policies and procedures is performed via management oversight and the Head of Governance, Risk & Compliance. For the year ahead we shall continue to assess the risk environment in relation to Modern Slavery & Human Trafficking and ensure our controls remain fit for purpose.

Ongoing Commitment

The Board, the Chief Executive and the Executive Management 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 and 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. Measures which we shall take in 2021 to further enhance our commitment to combatting modern slavery include:

- Develop a Modern Slavery Policy informing our workforce and our stakeholders of our commitment to acting ethically, with integrity and defining effective preventative systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains;
- Performing a risk assessment review of our top 10 suppliers by value based on both geographical area and information available on their approach to modern slavery 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; and
- Provide refresher training to employees in the Procurement Department, and other relevant personnel involved in the procurement process.

Mark Foley (on behalf of the Board)

Chief Executive
May 2021