

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 2021 was as follows:

Income Statement items	Note	EirGrid TSO € '000	SEMO € '000	SEMO px € '000	SONI TSO € '000	EWIC € '000
Segment revenue		574,209	17,378	3,798	125,520	69,021

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 2021.

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

Approach

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.

Steps Taken

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 top 10 suppliers in both EirGrid and SONI Ltd 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;
- Developed modern slavery **awareness training module** for employees in the Procurement Department and Legal Services Function to be rolled out in FY2022;
- **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 Act¹;
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 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.

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.

Ongoing Commitment

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 2022 to further enhance our commitment to combatting modern slavery:

- Our **Modern Slavery Policy** is being developed this year which shall confirm our zero-tolerance approach to modern slavery/human trafficking and our commitment 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/human trafficking is not taking place anywhere in our own business or in any of our supply chains;
- Performing a review of our top 10 suppliers in both EirGrid and SONI Ltd by potential risk with regard 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; and
- Deliver **awareness and refresher training** to employees in the Procurement Department, and other relevant personnel involved in the procurement process.

This statement was approved by the Board of Directors of on 22nd March 2022.

Mark Foley (on behalf of the Board)



Chief Executive
4th April 2022

¹ Extract from EirGrid Group Procurement Procedures Section 5 (Sustainable Procurement).