



Carrington Power Limited (the “Company”)

Statement on the Prevention of Slavery and Human Trafficking - 2021

INTRODUCTION

The Company 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.

The Company 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.

In June 2022, the board of the Company approved its first statement on the prevention of slavery and human trafficking as required by the turnover provisions in the UK Modern Slavery Act 2015 ('the Act'). This statement sets out the steps taken by the Company during 2021 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 Company's statement for its financial year ended 31 December 2021.

ESB'S BUSINESS AND SUPPLY CHAIN

The Company is part of the ESB group of companies. ESB is a vertically integrated utility whose business activities include the generation, transmission and distribution and supply of electricity in Ireland and the United Kingdom. Further details of ESB business operations can be found at www.esb.ie.

STEPS TAKEN in 2021

In 2021, the ESB Group took the following steps to prevent acts of modern slavery in its supply chains:

- A framework agreement was awarded to British Standards Institute (BSI) and InterTek to provide desk-top risk assessment and on-site CSR audit services to ESB for the period 2021-2024
- 207 vendors have subsequently been identified for this desk-top risk assessment and the issue of questionnaires to these suppliers commenced in Q.1 2022
- We continued to engage with our major coal suppliers to ensure that they are aware of ESB's commitment to the Bettercoal Organisation and Bettercoal Code, including ESB's commitment to 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 ILO's instruments on the rights of indigenous peoples
- We ensured that all tenderers and suppliers were aware of and signed-up to ESB's 3rd Party Requirements Document, which sets clear contractual

obligations on ESB's zero tolerance approach to Modern Slavery in our Supply Chains

- We continued to provide bespoke training on Modern Slavery Risks and 11 members of the ESB Procurement Team completed the Chartered Institute of Purchasing & Supply's (CIPs) Practitioner Programme, which includes training on ESG related issues and Corporate Social Responsibility, and
- ESB was recognised as a Supplier Engagement Leader by the Carbon Disclosure Project (CDP) in 2021.

ESB also launched an updated ESB Staff Employee Code of Ethics "Our Code" in September 2021, which includes guidance on ethical business practices and communicated these guidelines to all employees and contracting parties, click on the following link for further information [esb-our-code---september-2021.pdf](#)

In addition, ESB published a Human Rights Policy in 2021, linking its policies on human rights areas (Health and Safety, Environment and Sustainability, Cultural Diversity, ESB Equal Opportunities and Diversity, Anti-Bribery, Corruption & Fraud, Whistleblowing & Protected Disclosures and Modern Slavery), see link for further information [Microsoft Word - ESB Human Rights Policy](#)

The Company has also adopted ESB's Policy on Modern Slavery (available at www.esb.ie). This policy sets out the actions that the Company 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 Group Policies set out the protections for employees in reporting serious malpractice at work.

In order 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 were found during the course of these audits.

The specific work outlined above will be complemented by a further programme of work for 2022.

APPROVAL

This statement was approved by the Board of Directors of the Company on 8th June 2022.

Signed by:



**Director,
Carrington Power Limited**