



Northern Ireland Electricity Networks Limited Statement on the Prevention of Slavery and Human Trafficking – 2025

ABOUT THIS STATEMENT

This is Northern Ireland Electricity Networks Limited's ('NIE Networks' or the 'Company') tenth Modern Slavery Statement in accordance with section 54 of the Modern Slavery Act 2015 which applies for the financial year ending 31 December 2025, and was approved by the NIE Networks Board of Directors on 24 March 2026.

NIE Networks is committed to the highest level of ethical standards and sound governance arrangements and has a responsibility to understand the risks within its own business and supply chain, to reduce those risks, and ensure that there is transparency in its own business and in its approach to tackling modern slavery throughout its business and supply chain, and expects the same high standards from all of its contracting partners, suppliers and other business partners. The Company considers the measures highlighted within this Statement, together with NIE Networks' overall approach to ethics and employee and supplier engagement, are helping to reduce the risk of modern slavery and human trafficking in its business and supply chain.

ORGANISATIONAL STRUCTURE

NIE Networks is part of the Electricity Supply Board (ESB), the vertically integrated group of companies based in the Republic of Ireland. NIE Networks is an independent business within ESB with its own Board of Directors, management and staff.

NIE NETWORKS' BUSINESS AND SUPPLY CHAIN

NIE Networks is the owner of the electricity transmission and distribution networks in Northern Ireland and the operator of the distribution network, which serves over 966,000 connected customers.

All of NIE Networks' operations and its circa. 1,700 employees are based in Northern Ireland, and the Company invested in excess of £245m in the electricity infrastructure in Northern Ireland during 2025.

The Company's annual procurement spend is approximately £251m across circa 1,070 suppliers. As all of its business is undertaken within Northern Ireland, NIE Networks considers that the risk of modern slavery is more likely to arise from its supply chain than from its own business operations.

Further details on NIE Networks can be found at www.nienetworks.co.uk.

MEASURES TAKEN DURING 2025

Following on from previous statements on the prevention of slavery and human trafficking, published each year since 2017, NIE Networks has continued, during 2025, to implement the following measures to prevent acts of modern slavery or human trafficking from occurring within its own business or its supply chain.

A. HUMAN RESOURCES

NIE Networks has a people-centred approach to its business which supports its goal to deliver a sustainable energy system, maintaining service continuity, trust, and morale. NIE Networks also has a variety of supportive employment policies and is fully compliant with minimum wage legislation.

NIE Networks recruitment programme is designed to ensure equal opportunity, compliance with legislation and its diversity and inclusion policy and practices all ensure its employees have the appropriate rights to work. Background and eligibility checks help to identify cases where workers may be at risk of human trafficking or modern slavery. Although perceived as low risk, the Company completes pre-employment checks during the recruitment process.

In accordance with business requirements, NIE Networks core employee base is supplemented by agency workers for short term or specialist roles; and third-party suppliers. Agency or short-term workers are recruited through a named, approved agency that has been sourced in accordance with procurement legislation and the Company's internal procurement policies and procedures. The agencies are responsible for carrying out the same checks as for directly recruited employees and the agencies are required to adhere to the principles of NIE Networks business ethics as detailed in the document "Requirements for Contracting Partners – Business Ethics". All third-party suppliers doing business with NIE Networks are required to comply with legislation and policies and to adhere to the Company's approach to working in an ethical manner as is summarised within the document "Requirements for Contracting Partners – Business Ethics".

B. POLICIES AND PROCEDURES

NIE Networks has a comprehensive set of policies and procedures that emphasise the Company's commitment to the identification and prevention of unethical activities, including the prevention of modern slavery.

The [Policy on Modern Slavery](#) which was reviewed and updated in 2026 reflects the Company's commitment to prevent modern slavery including the roles and responsibilities of the Board through to each individual employee and the means by which any suspected incidences of modern slavery should be reported.

Some of the other Company policies which are considered relevant to the management of unethical activities, including modern slavery and human trafficking risks faced by the Company, include:

[Code of Ethics](#) – the Code of Ethics (the Code) sets out the principles and standards employees are asked to adhere to, and the underlying principle of the Code is that those within the scope of the Code will strive to perform their duties in accordance with the highest standards of safety, integrity, loyalty, fairness and confidentiality, and that they will comply with all legal and regulatory requirements. Further information about the Code is available in the "Staff Education and Awareness" section.

[Whistleblowing Policy](#) – NIE Networks seeks to ensure that concerns about incidents of wrongdoing, or other suspected malpractice, may be raised without fear of criticism or future discrimination. NIE Networks commits to high ethical standards in the way it operates and the Company encourages and supports its employees to 'speak up' when they see or believe there is wrongdoing in the workplace. Its Whistleblowing Policy outlines how concerns may be raised. Although the aim of this policy is to provide an internal mechanism for reporting, a confidential, independent, external reporting line (including email) is also available should employees wish to raise concerns anonymously.

[Requirements for Contracting Partners – Business Ethics](#) – clearly communicates the Company’s requirements for contracting partners in relation to business ethics matters including compliance with legislation and policies and extending to the Modern Slavery Act 2015.

C. DUE DILIGENCE PROCEDURES

Procurement Processes

In terms of managing the risk of modern slavery or human trafficking existing within its supply chain, NIE Networks continued to implement the measures adopted in previous years and ensured compliance, where applicable, with the Procurement Act 2023, which came into force on 24 February 2025 in the UK. NIE Networks uses the Achilles Utilities Vendor Data Base (UVDB), a portal for suppliers in the utilities industry, to pre-select suitable suppliers. A question set is included which enables NIE Networks (and other utilities) to assess a suppliers procedures in relation to the prevention of slavery and human trafficking in its organisation and supply chain. A similar set of questions is included in NIE Networks’ E-Sourcing procurement system in order to capture those suppliers not using the UVDB portal. For those suppliers that NIE Networks enters into contracts with, provisions in respect of modern slavery are included in standard form contracts as part of contracting partners’ ongoing obligations to comply with a number of ethical requirements set out in NIE Networks’ Requirements for Contracting Partners – Business Ethics.

D. STAFF EDUCATION AND AWARENESS


NIE Networks reviewed and updated its Code of Ethics in September 2025, which provides guidance on ethical business practices and employees responsibilities to live up to the Code of Ethics. Periodically, during 2025, NIE Networks issued a series of internal communications which were intended to remind employees of the Company’s commitment to ethical practices, their responsibilities under the Code of Ethics to ‘speak up’ and to report any concerns of serious wrongdoing in the workplace. The Code of Ethics makes specific reference to the Company’s respect and promotion of international human rights standards and that any concerns should be reported immediately via any of the reporting channels detailed within the Company’s Whistleblowing Policy.

During the year, refresher training was also provided on the identification and prevention of slavery and human trafficking to all employees in the Procurement Department.

E. MEASURING EFFECTIVENESS

During 2025, in order to understand how effective the controls set out within this Statement are, and to ensure that modern slavery or human trafficking does not exist within NIE Networks’ supply chain, external desktop audits were conducted on the activities of suppliers considered to operate in high risk regions or industries. No incidents of modern slavery have been found to date. The specific work outlined above will be complemented by a further programme of work during 2026.

Signed by:



**Managing Director
Northern Ireland Electricity Networks Limited**