



Coolkeeragh ESB Limited (the “Company”)

Statement on the Prevention of Modern Slavery and Human Trafficking 2025

1. Introduction

The Company operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships. ESB maintains and enforces policies, procedures and controls designed to reduce the risk of modern slavery occurring within its operations or supply chains.

The Company is committed to transparency in its approach to addressing modern slavery throughout its supply chains and expects equivalent standards from its contractors, suppliers and other business partners.

In June 2017, the board of the Company approved its first statement on the prevention of modern slavery and human trafficking in response to the UK Modern Slavery Act 2015 “(the Act)”.

This statement is made pursuant to section 54 of the Act and covers ESB’s financial year ended 31 December 2025.

2. ESB’s Business and Supply Chain

ESB is a vertically integrated utility operating across electricity generation, transmission, distribution and supply in Ireland and the United Kingdom.

As the majority of ESB’s operations are undertaken in the Republic of Ireland, Northern Ireland and Great Britain, ESB considers that the risk of modern slavery is more likely to arise in its supply chains than in its own operations.

Excluding fuel, ESB’s annual procurement spend is approximately €2.4 billion, with an active supply base of approximately 5,000 suppliers.

Further details of ESB’s business operations can be found at www.esb.ie.

3. Actions Taken in 2025

The Company complies with applicable employment law in the jurisdictions in which it operates and requires equivalent compliance through contractual arrangements with agency staff providers.

During 2025, ESB undertook the following steps to assist in preventing modern slavery within its supply chain:

- Undertook 92 Contractor Employment Standards audits on ESB-managed sites across the Republic of Ireland and the United Kingdom.
- Completed 48 supplier self-assessment questionnaires across various locations worldwide.
- Completed a follow-on audit at a key supplier facility in India.
- Continued to engage a third-party supply chain risk analysis organisation to provide periodic risk updates on ESB’s key suppliers, including by location and spend.

- Updated its Modern Slavery Policy to include a confidential helpline, which is available to contractors, suppliers, external agents and other non-employees working on behalf of ESB.
- In 2025, ESB joined the Solar Stewardship Initiative and continued its membership of the Responsible Commodities Sourcing Initiative (RECOSI) to enhance standards and transparency within supply chains.
- Required tenderers to acknowledge, and confirm compliance with, ESB's Requirement for Third Parties policy, which imposes contractual obligations reflecting ESB's approach to addressing modern slavery in supply chains.
- Continued to develop its supply chain risk management approach. In 2025, ESB introduced an updated risk assurance process reflecting the expanded scope of its supply chain.
- Engaged with suppliers regarding ESB's sustainability objectives and published an updated Supplier Charter setting out the principles governing collaboration.
- As a founding member of the Supply Chain Sustainability School, ESB supports awareness of sustainability in the construction and civil sectors. In 2025, the school provided workshops and training materials on identifying modern slavery in supply chains, and ESB's procurement teams participated.

4. Training

All ESB employees are required to complete mandatory Code of Conduct training via ESB's online learning portal. The training addresses ethical business practices applicable to ESB employees and contracting parties. Further details on ESB's Code of Ethics are available here: [ESB Code of Ethics](#).

5. ESB's Modern Slavery Policy and Workers in the Value Chain Policy

The Company adopted ESB's policy on Modern Slavery in 2017 and subsequently updated in 2024, and is communicated to employees, contractors and suppliers. The policy sets out the actions ESB will take to assist in preventing modern slavery, the roles and responsibilities from Board level to individual employees, and the process for reporting suspected incidents. Employees, contractors and suppliers are encouraged to raise concerns through a confidential helpline.

6. ESB's Human Rights Policy

ESB's Human Rights Policy sets out its approach across areas including health & safety, environment & sustainability, cultural diversity, equal opportunities & diversity, anti-bribery, corruption & fraud, whistleblowing and modern slavery. Further details are available here: [ESB Human Rights Policy](#).

7. Conclusion

Based on the foregoing, the Company considers that appropriate controls are in place to mitigate the risk of modern slavery within its business and supply chains. The effectiveness of these controls is assessed through external audits of suppliers and contractors operating in higher-risk regions or industries. No incidents of modern slavery were identified in 2025.



8. Approval

This statement was approved by the Board of Directors of Coolkeeragh ESB Ltd on 8th May 2026

Signed by:

A handwritten signature in black ink, appearing to read 'j. Kelly'.

Joseph Kelly
Director,
Coolkeeragh ESB Limited.

Appendix 2

The Act requires that the statement must describe the steps the organisation has taken during that year to ensure that modern slavery and human trafficking are not taking place in any of its supply chains, and in any part of its own business.

The statement may also include the following:

- the organisation's structure, business and supply chains
- its **policies** in relation to slavery and human trafficking
- its **due diligence** processes in relation to slavery and human trafficking in its business and supply chains
- the parts of its business and supply chains where there is a **risk** of slavery and human trafficking taking place, and steps to assess and manage that risk
- its **effectiveness** in ensuring that slavery and human trafficking is not taking place in its business or supply chains, using appropriate performance indicators
- employee **training** about slavery and human trafficking