

# **GAS NETWORKS IRELAND AND GNI (UK) LIMITED**

## **Statement on Slavery and Human Trafficking**

### **INTRODUCTION**

This is the statement of Gas Networks Ireland (“**GNI**”) and GNI (UK) Limited (together the “**GNI Group**”) on slavery and human trafficking following the introduction of the UK Modern Slavery Act 2015 (“the Act”). This statement is made pursuant to section 54 of the Act and constitutes the GNI Group’s statement for financial year ended 31 December 2022.

GNI is a wholly owned subsidiary of Ervia, established pursuant to section 5 of the Gas Regulation Act 2013. It carries out activities with respect, inter alia, to the construction, operation and maintenance of, and the provision of services with respect to, GNI’s transmission and distribution networks used to transport natural gas to and within Ireland and includes all businesses carried out or to be carried out by the networks business from time to time and any subsidiaries of GNI from time to time (other than GNI (UK) Limited).

GNI (UK) Limited is a wholly-owned subsidiary of GNI, registered in England and Wales. The principal activity of the company is the transportation of natural gas (1) together with GNI, through two pipelines from Moffat in Scotland to Gormanston and Loughshinny in Ireland; and (2) from Belfast to Derry (through the North-West Pipeline) in Northern Ireland, and from Gormanston, Ireland to Belfast (through the South-North Pipeline).

For more information on the GNI Group, please see GNI’s website, which can be found at [www.gasnetworks.ie](http://www.gasnetworks.ie).

### **APPROACH**

The GNI Group fully supports the aims of the Act and has a zero-tolerance approach to modern slavery. The GNI Group remains 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 GNI Group is committed to ensuring that there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains and expects the same high standards from all its contractors, suppliers and other business partners.

### **STEPS TAKEN**

In order to prevent acts of slavery and human trafficking from occurring within its business and supply chains, the GNI Group has taken the following steps:

- the GNI Group seeks at all times to comply with employment law applicable to the jurisdictions in which it operates and puts in place contractual arrangements with providers of agency staff requiring that they achieve the same level of compliance;
- the principles of the Act have been enshrined in the Code of Business Conduct (available at [www.ervia.ie](http://www.ervia.ie)) which is reviewed on an annual basis. This is also highlighted and supported by a group-wide programme called Doing the Right Thing which aims to ensure that everyone carrying out business on our behalf does so with integrity and in an ethical manner;

- the GNI Group has developed anti-slavery and human trafficking requirements for incorporation into its procurement processes and contractual arrangements with contractors, suppliers and other third parties;
- the GNI Group provides training to relevant employees, particularly those involved in procurement processes, on the risks of slavery and human trafficking occurring; and
- the GNI Group also provides a mechanism for employees, and others, to report suspected incidents of unlawful behaviour, including slavery and human trafficking.

In 2022, building on the output of an external (expert) review of our supply chain, the GNI Group:

- developed a framework for sustainable procurement, which included the development of a sustainable procurement policy, supplier charter and sustainable procurement processes;
- completed a gap analysis against ISO 20400 Sustainable Procurement Certification (Guidance Standard) which formed the basis of an action plan to embed sustainable procurement in the organisation;
- continued to risk assess suppliers using heatmap methodologies;
- commenced pilot procurements using additional award criteria requiring suppliers to demonstrate best practice in the prevention and mitigation of risks of modern slavery or human trafficking; and
- rolled out training and workshops in relation sustainable procurement, including modern slavery.

GNI is a member of the UK based supply chain sustainability school and is looking to partner with an equivalent Irish grouping.

#### **OUR CONTINUED COMMITMENT**

Over the course of the next financial year, we will continue to implement the findings of the 2022 report, enhancing our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers. In particular, the GNI Group plans to take the following steps:

- roll out our bespoke sustainable procurement policy which has been developed based on best practice guidance together with findings from surveys and interviews conducted as part of the broader sustainability project and the report, including drafting a supplier charter;
- roll out enhanced award criteria by requiring suppliers to demonstrate best practice in the prevention and mitigation of risks of modern slavery or human trafficking, in particular targeting high risk contract renewals to incorporate best practice modern slavery requirements;
- enhance contractual provisions in our key contracts to include annual supplier declarations of compliance and provision of evidence and data to confirm compliance;
- continue to enhance the training and education programme and roll out additional training and resources across the business, particularly to areas of the business involved in procurement processes; and
- continue the process of understanding our extended supply chain including our key and critical suppliers and their supply chains and associated risks including modern slavery and human rights.

Any instances of non-compliance with the Act will be assessed on a case-by-case basis, with any remedial action tailored appropriately.

This statement was approved by the Board of Directors of GNI and GNI (UK) Limited.

A new statement will be published each year on GNI's website for the GNI Group at [www.gasnetworks.ie](http://www.gasnetworks.ie).

A handwritten signature in blue ink that reads "Denis O'Sullivan". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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Denis O'Sullivan  
Director