

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 2024. GNI was 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.

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

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.gasnetworks.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 behalf of the GNI Group 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 2024, the GNI Group:

- continued to implement a sustainable procurement policy to ensure sustainability considerations, including prevention of illegal labour practices and modern slavery, are integrated consistently across all GNI Group procurement activities;
- continued to communicate GNI's Supplier Charter (which sets out environmental, social and governance ("ESG") standards and values) which partners and suppliers are expected to comply with when engaging with the GNI Group, including with respect to modern slavery and human trafficking;
- hosted a supplier event in September 2024 which included a presentation on the outcome of a Supplier Survey (which included a series of questions on the implementation of ethical practices and human rights);
- enhanced our supplier risk management process which prioritises suppliers on a criticality basis with a focus on operational impact, financial wellbeing, market risks, business continuity and ESG risks (to include modern slavery and human trafficking);
- won the Sustainable Procurement Team of the Year (SME) at the 2024 National Procurement Awards which acknowledges progressive and best practices in sustainability including protection of labour rights and prevention of modern slavery and human rights in procurement processes;
- aligned its practices with ISO 20400 for Sustainable Procurement and in June 2024 it achieved an "established" rating which was an improvement on its previous "evolving" rating from 2022. This positions GNI as a leader in the utility sector among its UK and ROI counterparts – the benchmark assessment included an evaluation of the social aspects of GNI's procurement and supply chain, including the protection of human rights and efforts to combat modern slavery;
- continued the review of its top 40 critical suppliers, including preparation of risk reports on each supplier, which include reporting on human trafficking and modern slavery – by the end of 2024, 25 of GNI's top suppliers had been assessed;
- continued to review its supply chains (following phase 1 of a supply chain mapping report) to enable it to understand key risks in the supply chain of critical materials, including the source metals and minerals;

- continued to provide sustainable procurement training to employees, in particular, those involved in procurement processes;
- incorporated anti-slavery and human trafficking requirements into its contractual arrangements with suppliers (as and when required);
- included additional award criteria in its tender processes requiring suppliers to demonstrate best practice in the prevention and mitigation of risks of modern slavery or human trafficking – this is done on a case-by-case basis following a defined risk assessment;
- retained its A- rating for 2023 from the CDP (a sustainability and carbon disclosure rating system) based on its achievements in relation to several sustainability criteria including modern slavery and human trafficking;
- was one of the 15 founding partners of the Irish Supply Chain Sustainability School which is a free virtual learning platform designed to upskill individuals working within, or aspiring to work within, the built environment sector – it includes a focus on modern slavery and human rights;
- continued to engage with other organisations as a member of the Semi-States Sustainability Forum and the Semi-States Corporate Sustainability Reporting Directive Technical Workgroup where requirements and implementation of human rights and modern slavery best practices are shared;
- rolled out an updated Protected Disclosures Policy and training in line with the Irish Government’s Statutory Guidance in November 2023 for public bodies and the Protected Disclosures (Amendment) Act 2022; and
- rolled out a number of initiatives as part of its ‘Doing the Right Thing Programme’, including mandatory manager training on Protected Disclosures as well as an integrity conversation required to be undertaken across all teams in the organisation on Protected Disclosures and the importance of a positive speaking up culture where employees are encouraged to raise issues of concern, in the knowledge that they will be supported and protected by the organisation as appropriate.

OUR CONTINUED COMMITMENT

Over the course of the next financial year, the GNI Group will continue to implement and enhance its procedures to help 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:

- publish GNI’s first Human Rights Policy to include sections relating to modern slavery and human trafficking;
- publish GNI’s first Supplier Code of Conduct which will outline mandatory human rights and modern slavery measures that all key suppliers must implement;

- commence a due diligence process review which will include a review of the human rights and modern slavery due diligence process and recommendations for enhancement – this will feed into the above referenced Code of Conduct;
- implement human rights monitoring, tracking and remediation processes to align with the international human rights framework;
- publish contact details for the reporting of any human rights and / or modern slavery concerns in its value chain;
- participate in the important Semi-State National Human Rights Dialogue sponsored by the Department of Enterprise, Trade and Employment and the Department of Foreign Affairs in 2025 – the aim is to bring together various stakeholders, including government officials, semi-state bodies, civil society organisations, and human rights experts, to discuss and promote human rights within Ireland;
- conduct a demand plan risk analysis for 2025 by identifying critical suppliers and contracts for the forthcoming year with a focus on key critical challenges, risks and opportunities including human rights, modern slavery and human trafficking;
- commence phase 2 of the supply chain mapping project which includes a deeper assessment of human rights and modern slavery in GNI's critical material supply chains;
- continue to prepare for the implementation of the Corporate Sustainability Reporting Directive and the Corporate Sustainability Due Diligence Directive through dedicated internal committees;
- require all managers in GNI to undertake mandatory training on Protected Disclosures, Risk reporting and Anti-Fraud, Bribery and Corruption; and
- continue to roll out important initiatives as part of the Doing the Right Thing Programme including integrity conversations across all teams in the organisation on Protected Disclosures and Risk reporting. Launch a new video for the programme and issue a survey to all staff to get feedback on how the programme is landing and its impact. Undertake targeted workshops on conflicts of interest in areas where there is a heightened risk of conflict of interest.

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.



Cathal Marley
Director