

# **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 2025. 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](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, in **2025**, the GNI Group has taken the following steps:

- complied at all times with employment law applicable to the jurisdictions in which it operates and put in place contractual arrangements with providers of agency staff requiring that they achieve the same level of compliance;
- enshrined the principles of the Act in the Codes of Business Conduct (available at [www.gasnetworks.ie](http://www.gasnetworks.ie)) which are reviewed on an annual basis. This is also highlighted and supported by a group-wide programme called ‘Doing the Right Thing’ (“**DTRT**”) which aims

to ensure that everyone conducting business on behalf of the GNI Group does so with integrity and in an ethical manner;

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

Specifically, in **2025**, the GNI Group:

- continued to implement the sustainable procurement requirements set out in the Board approved Procurement Policy to ensure that 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 standards and values and 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 October 2025 which included an overview of GNI's Supplier Charter highlighting the expectations around human rights and modern slavery;
- enhanced its supplier risk management process which prioritises suppliers on a criticality basis with a focus on operational impact (the criticality of the supplier to the continuing operations of GNI), financial wellbeing (financial assessment of suppliers) and market risks (supplier business operating risks);
- continued the review of the GNI Group's top 40 critical suppliers, including preparation of risk reports on each supplier, which included reporting on human trafficking and modern slavery – by the end of 2025, 30 of the GNI Group's top suppliers had been assessed;
- conducted a demand plan risk analysis by identifying critical suppliers and contracts with a focus on key critical challenges, risks and opportunities including human rights, modern slavery and human trafficking;
- commenced phase 2 of the supply chain mapping project which includes a deeper assessment of human rights and modern slavery in the GNI Group's critical material supply chains;
- continued to incorporate anti-slavery and human trafficking requirements into its contractual arrangements with suppliers (as and when required);
- continued to include 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;

- continued to align its practices with ISO 20400 for sustainable procurement and maintained its “established” rating – this positions GNI as a leader in the utility sector among its UK and Republic of Ireland counterparts;
- continued to provide sustainable procurement training to employees, particularly those involved in procurement processes;
- retained its CDP Supplier Engagement Assessment score of A- and Climate Change score of B, based on its achievements in several sustainability criteria including upstream value chain transparency and human rights. CDP is an environmental impact disclosure rating system;
- as an appointed 2024/2025 Sustainable Development Goal (“SDG”) Champion, continued to raise awareness and actively promote the SDGs, and drove impactful actions towards their achievement;
- recertified to the Business Working Responsibly Mark in Ireland’s Economic, Environmental, Social and Governance standard. The GNI Group is one of only 40 companies in Ireland to hold the mark. Third party verified by the National Standards Authority of Ireland, the Business Working Responsibly Mark is the standard for sustainability that fosters a culture of continuous improvement, ongoing accountability, and leadership. The standard includes human rights as one of the indicators under the social pillar and the standard certification process also assesses organisations through the lens of human rights under the Economic Indicator of Product/Service Design and Lifecycle Management, which requires companies to demonstrate they have considered both Environmental and Social impact across their entire product or service lifecycle;
- commenced a review of the human rights and modern slavery due diligence process. The review included assessment of health and safety, quality, sustainability, cyber security, business continuity, supplier auditing and human rights and modern slavery against best practice Due Diligence Maturity Model. The overall assessment was that the GNI Group is making progress across the due diligence topics with recommendations made for enhancement;
- completed the GNI Fraud Risk Management Framework which addresses GNI’s fraud control strategy, fraud prevention and detection, communication and training and fraud reporting and response / investigation procedures;
- undertook a review of the GNI Group Protected Disclosures Policy, Codes of Business Conduct and Anti-Fraud, Bribery and Corruption policies;
- required the completion by all managers in the GNI Group of mandatory training on protected disclosures, risk reporting and anti-fraud, bribery and corruption;
- rolled out important initiatives as part of the GNI Group’s DTRT Programme including:

- integrity conversations across all teams in the organisation on protected disclosures and risk reporting;
  - launched a new video for the DTRT Programme;
  - issued a survey to all staff for feedback on how the Programme is being received and its impact; and
  - undertook targeted workshops on conflicts of interest
- carried out “no regret” work on foot of the requirements of the Corporate Sustainability Reporting Directive (“**CSRD**”) notwithstanding that the Directive is not currently applicable to the GNI Group. The double materiality assessment determined that human rights is embedded into every part of how the GNI Group operates and reports and the most important topics include governance, integrity and ethics, GNI’s own workforce, workers within the value chain, affected communities and consumers or end-users; and
- reshaped the GNI Group 2025 Annual Report to integrate the annual Sustainability Report around the CSRD double materiality assessment topics and conducted a refresh of its Sustainability Commitments.

## **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 in **2026**:

- develop and publish a new Supplier Code of Conduct which will set out the GNI Group’s expectations in relation to human rights and modern slavery for key suppliers. The Code will call out minimum standards in respect of which suppliers must comply including human rights and modern slavery and will outline the monitoring and tracking mechanisms as well as the mitigation process for non-compliance;
- continue to communicate GNI’s ‘Supplier Charter’ (which sets out environmental, social and governance standards and values) to partners and suppliers which includes GNI’s expectations with respect to modern slavery and human trafficking;
- host the annual supplier event which will include an overview of GNI’s Supplier Charter highlighting the expectations of suppliers with respect to human rights and modern slavery;
- review the remaining 10 of the top 40 critical suppliers, including preparation of risk reports on each supplier, which will include reporting on human trafficking and modern slavery;
- complete a high-level Supply Chain Human Rights and Modern Slavery risk assessment that will prioritise those suppliers with highest impacts;
- continue to communicate human rights and modern slavery expectations to GNI’s contract managers and suppliers through access to the Supply Chain School’s human rights resources, training events and GNI’s annual supplier event;

- continue to assess all above EU threshold tenders to identify potential human rights and modern slavery impacts, through GNI’s formal sustainability risk and opportunities assessment process;
- continue to include robust human rights and modern slavery requirements and clauses in contracts, particularly in respect of contracts that have been identified as a potential risk in relation to human rights and modern slavery;
- continue to provide sustainable procurement training to employees, particularly those involved in procurement processes;
- retain the GNI Group CDP Supplier Engagement Assessment Score of A-;
- deliver on the GNI Group sustainability commitments and continue to monitor progress in relation to CSRD and the Corporate Sustainability Due Diligence Directive requirements and the revised sustainability reporting standards;
- as a current SDG Ambassador (role of SDG Champion concluded in 2025), continue to raise awareness, actively promote the SDGs, and drive impactful actions towards their achievement;
- retain the Business Working Responsibly Mark; and
- continue to deliver mandatory training to all GNI managers on protected disclosures, risk reporting and anti-fraud, bribery and corruption.

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).



Kevin Toland  
**GNI Director**



Ronan Galwey  
**GNI (UK) Director**