

## INTRODUCTION

Power NI Energy Limited (“Power NI or “the Company”) fully supports the aims of the Modern Slavery Act 2015 (“the Act”) and is committed to tackling slavery and human trafficking where it can. This statement is made pursuant to section 54(1) of the Act and constitutes the Company’s slavery and human trafficking statement for the financial year ended 31 March 2021.

Power NI is committed to the highest level of ethical standards and sound governance arrangements and prohibits all forms of slavery and human trafficking in all its different forms in any part of its businesses and its supply chain.

## ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Power NI’s parent company is Energia Group NI Holdings Limited and is part of the Energia Group which includes Energia Group Limited and its subsidiary undertakings (“the Group”). Energia Group Limited is registered in the Cayman Islands. The Group is the leading independent energy company in Ireland and operates under three business units, Renewables, Flexible Generation and Customer Solutions. The Renewables business owns and operates renewable electricity generation assets as well as purchasing renewable electricity from third party generators throughout Ireland. The Flexible Generation business owns and operates conventional electricity generation assets in the RoI and procures power from conventional generation assets in Northern Ireland. The Customer Solutions business supplies electricity and gas to customers in the RoI and Northern Ireland.

The Company operates in Northern Ireland, supplying electricity to residential and commercial customers through its Power NI business and procuring power through its Power Procurement Business. The Company also purchases renewable electricity from fellow Group subsidiaries and third-party generators in Northern Ireland. The Company had 424 employees at 31 March 2021. Turnover for the year ended 31 March 2021 was £717.7m. The majority of the Company’s supply chain is sourced from within the UK and the RoI.

There have been no changes in the principal activities of the Company for the financial year ended 31 March 2021.

The Company Secretary is responsible for the management of modern slavery within the Company.

## RELEVANT POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. During the financial year ended 31 March 2021 the Company Secretary reviewed and updated the Group’s Modern Slavery Policy. The updated Modern Slavery Policy was approved by the Board of Energia Group NI Holdings Limited on 10 March 2021.

Other Group policies which are considered relevant to the management of modern slavery risks faced by the Company include:

- Code of Conduct – formalises the high standards of behaviour and performance expected from employees e.g. to comply with all lawful directions given by or under

## Modern Slavery and Human Trafficking Statement For the year ended 31 March 2021



the authority of the employer and with all company rules, regulations, policies and procedures. Employees are also expected to give due consideration to the safety and welfare of others, including by complying with the provisions of legislation on health and safety and working conditions

- Equal Opportunities Policy – opposes all forms of unlawful discrimination and commits to the operation of fairness and equality at work and in the services provided to customers
- Recruitment and Selection Policy – commits that those involved in recruitment will comply with the principles of equality of opportunity and are appropriately trained in good recruitment practices
- Dignity at Work Policy - supports dignity at work for all employees, prevents harassment, provides guidance for the resolution of issues and prevention of recurrence
- Grievance procedure – procedures which allows for an employee who has a concern, problem or complaint about some aspect of their work to raise a grievance
- Anti-corruption and Bribery Policy – which commits the Group to uphold all laws relevant to countering bribery and corruption in all jurisdictions in which it operates
- Whistleblowing – procedures to allow employees, in the event that they discover serious malpractice or wrongdoing, to voice concerns in a responsible and effective manner without fear of reprisal

### **THE MODERN SLAVERY AND HUMAN TRAFFICKING RISK**

Our Modern Slavery Policy is key for the Company having in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Monitor potential risk areas in our supply chains and consider emerging risks of suppliers located within higher risk countries

We encourage the reporting of concerns by our employees to their line managers or heads of department. If they are unsure on whether to raise a concern they can contact our confidential advice line managed for us by Public Concern at Work to ensure independence.

### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking and have previously written to our suppliers notifying them of our support for the aims of the Act and provided them with a copy of our Modern Slavery Policy. The Energia Group's procurement policy includes cross references to Modern Slavery and the Modern Slavery Policy. Furthermore, we previously surveyed those suppliers identified as having an active business relationship with the Company as part of our efforts to identify and assess potential risk areas in our supply chains.

The Energia Group also employs a Procurement Manager and a Risk Governance Manager who, as part of their roles, ensure that there is a high level of understanding of the risks of slavery and human trafficking in our supply chains and our business.

During 2020/21 the Group was awarded the Business Working Responsibly Mark for responsible and sustainable business practices. The Mark, developed by Business in the Community Ireland and audited by the NSAI, is based on ISO26000.

Modern Slavery and Human Trafficking Statement  
For the year ended 31 March 2021

**Training**

The Group Procurement Manager undertakes CIPS Ethical Procurement training on an annual basis and during 2020/21 a number of additional Company and Group staff received CIPS Ethical Procurement training for the first time. Furthermore during 2020/21 all Group staff received online Anti Bribery and Corruption legislation training as part of the Group's compliance training programme. The Company will seek to build on its training programme during 2021/22.

This statement was approved by the Board of Power NI Energy Limited.

Alwyn Whitford  
Director  
14 September 2021