

Northern Ireland Electricity Networks Limited

POLICY ON MODERN SLAVERY

Company Secretary
November 2018

Contents

1. Purpose and Key Principles	3
2. Policy Statement	3
3. Prevention of Modern Slavery	3
4. Roles and Responsibilities	4
5. Reporting Incidents	5
6. Policy Violation.....	5
7. Review of Policy	6
8. Related Policies and Procedures.....	6

1. PURPOSE AND KEY PRINCIPLES

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “**Act**”). The Act imposes obligations on organisations of a certain size which carry on a business in the United Kingdom. Modern slavery can occur in various forms, including servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. NIE Networks has adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term ‘modern slavery’ has the meaning given to that term in the Act.
- 1.2 This policy applies (a) to all employees, officers and directors of NIE Networks (b) to agents, vendors, contractors, representatives, advisors and other third parties acting on behalf of NIE Networks and (c) to contractors and suppliers of goods and/or works or services to NIE Networks.

2. POLICY STATEMENT

- 2.1 NIE Networks has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all of our contractors, suppliers and other business partners.
- 2.2 In summary:
- We have a zero tolerance attitude to modern slavery.
 - We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.
 - We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

3. PREVENTION OF MODERN SLAVERY

- 3.1 In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall:
- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness, re-assessing at least biennially;

- engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Act, at all times;
- incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and, where appropriate, carry out an audit and/or investigation of the activities of those contractors, suppliers or business partners deemed high risk; and
- provide training to relevant employees to facilitate achievement of the objectives of this policy.

4. ROLES AND RESPONSIBILITIES

4.1 NIE Networks management has overall responsibility for this policy. The key roles and responsibilities within NIE Networks in relation to this policy are as follows:

4.2 Board

- Determination of corporate policy in respect of the Act (i.e. this policy), and
- Approving the annual statement required by the Act.

4.3 Audit & Risk Committee

- Supporting the ongoing implementation of this policy which may include regular review of the internal control framework and controls identified as being needed to drive compliance with this policy.

4.4 Management

- Day-to-day operational responsibility for the implementation of this policy,
- Allocating sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness,
- Ensuring that all managers and other staff who may deal with concerns or investigations under this policy receive appropriate training, and
- The Head of Procurement is responsible for operating and maintaining internal control systems to prevent the occurrence of modern slavery in our supply chains.
- The Human Resources Director is responsible for operating and maintaining internal control systems to prevent the occurrence of modern slavery in the recruitment, selection and employment of employees or other persons engaged via agencies to provide services for NIE Networks.

4.5 Employees (and third parties working for us or under our control)

- Conducting business in a manner such that the opportunity for any incidence of modern slavery is prevented,
- Avoiding any activity that might lead to, or suggest, a breach of this policy, and
- Reporting any suspected incidents of modern slavery.

5. REPORTING INCIDENTS

- 5.1 Employees (and agency staff, trainees, external consultants and contractors working with NIE Networks) are encouraged in the first instance to report any suspected wrongdoing to their Head of Department who will raise the matter with the Company Secretary. Alternatively, employees can raise the matter directly with the Company Secretary.

NIE Networks has also made available an external Confidential Telephone/Web Reporting Facility provided by “Safecall” which employees can use to report suspected serious malpractice or wrongdoing. This offers a safe and confidential (and if necessary an anonymous) means for employees who may otherwise feel uncomfortable coming forward to their line manager / head of department or the Company Secretary, using any of the following methods:

- By calling Safecall at any time on **0800 915 1571**, or
- Via email nienetworks@safecall.co.uk, or
- Via the web at www.safecall.co.uk/report



This Helpline/ Web Facility is managed and operated by an independent company separate from NIE Networks. Callers to the Helpline will be asked by trained operators for details of their concerns. Similar questions are used in the web facility. At the end of the telephone interview or submission of an online report, a report number will be allocated to facilitate call back or subsequent access to the website to check for a response, or to facilitate the provision of additional information. Further details can be found in NIE Networks “Whistleblowing” Policy (available on The Wire) and on the NIE Networks website at www.nienetworks.co.uk.

NIE Networks Company Secretary receives reports from Safecall which will be followed up in accordance with the Whistleblowing Policy.

Any other third party, including members of the public who have any concern, issue or suspicion of modern slavery in our business or related supply chain should write with full details to the Company Secretary by emailing to ruth.conacher@nienetworks.co.uk or by post to the Company Secretary, NIE Networks, 120 Malone Road, Belfast, BT9 5HT.

6. POLICY VIOLATION

- 6.1 An employee or contractor involved in a wrongdoing in breach of this policy may:

- face employee disciplinary procedures, which may in turn result in penalties being imposed on that employee (up to and including dismissal).
- be reported to the relevant person’s employer which may in turn result in the termination of the service contract with the contractor, contracting company, or agency worker. NIE Networks may also take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the employee / contractor and/or other individuals concerned.

7. REVIEW OF POLICY

- 7.1 Following its initial adoption, this policy will be reviewed on an annual basis. It may be revoked, replaced or changed at any time. Staff will be informed of any material changes made to the policy.

8. RELATED POLICIES AND PROCEDURES

- 8.1 Please refer to the following NIE Networks policies and procedures which can be found on The Wire, on the NIE Networks' website at www.nienetworks.co.uk, from line managers or from the Company Secretary:
- Code of Ethics
 - Whistleblowing Policy
 - Policy on Fraud and other related unlawful activities
 - Requirements for contractors - Business Ethics