

Bord na Móna

Modern Slavery Statement

Bord na Móna Plc

29th March 2023

Introduction

The United Kingdom's Modern Slavery Act 2015 (the "Act") requires commercial organisations operating in the United Kingdom, providing goods or services and having an annual turnover above £36m to produce a statement setting out the steps they are taking to address and prevent the risk and/or occurrence of modern slavery in their operations and supply chains. This statement is made pursuant to section 54 of the Act and relates to the financial year ending 29th March 2023 (the "Financial Year").

BNM's structure, its business and its supply chains:

Bord na Móna Plc is Ireland's leading environmentally responsible integrated utility service provider encompassing electricity, heating solutions, resource recovery, horticulture and related services. Bord na Móna Plc is incorporated in Ireland and has subsidiaries both nationally and internationally that supply goods and services both in Ireland and abroad, including the United Kingdom (together "BNM"). BNM is subject to the Act as during the Financial Year it had UK and Irish subsidiaries providing goods within the UK and has an annual global turnover in excess of £36m.

BNM ceased commercial operations in the UK during the Financial Year, the requirements of the Act therefore no longer apply to BNM from the end of the Financial Year.

Policies in relation to slavery and human trafficking

BNM has always taken pride in giving back to local communities through active and direct involvement. This ethos is extended to international communities where BNM has direct dealings, whether through itself, supply chains, suppliers and/or contractors. BNM is committed to upholding and respecting all aspects of human rights. This is enforced at both the parent company level and at the subsidiary level.

BNM's policies, including Protected Disclosures, Codes of Conduct, Anti Bribery, Corruption and Fraud, and Procurement, support this commitment.

The parts of the business and supply chains where there is a risk of slavery and human trafficking taking place and its due diligence processes in relation to slavery and human trafficking in its business and supply chains;

BNM considers the biomass operations as the area most at risk for human trafficking and slavery as it interacts with suppliers in "at-risk" countries. Procurement and Legal are functions which have assisted in ensuring compliance with the Act due to the nature of the services they provide, these functions have an awareness that such supply chains may require additional due diligence in relation to slavery and human trafficking.

Although no longer required to comply with the requirements of the Act and notwithstanding that there is currently no direct equivalent to the 'Act' in Irish legislation, BNM remains committed to the principles of anti-modern slavery.

Bord na Móna

Training and capacity building about slavery and human trafficking available to its staff

The aim is to have the following measures in place over the next financial year:

1. Consider BNMs approach to anti modern slavery as part of the EU's proposed Corporate Sustainability Due Diligence Directive ("CSDDD") which aims to foster sustainable and responsible corporate behaviour and to anchor human rights and environmental considerations in companies' operations and corporate governance
2. Review BNM's Procurement Policy. The policy currently requires suppliers to comply with the principles enshrined in the Act and confirms that BNM shall incorporate anti-modern slavery commitments in its procurement agreements and contractual processes as appropriate.

This Modern Slavery Statement will be published on the Bord na Móna website relating to the Financial Year. Although not required by Irish legislation, BNM will consider continuing to publish a statement akin to that required by the Act to demonstrate its commitment to anti-modern slavery as part of the EU's proposed Corporate Sustainability Due Diligence Directive ("CSDDD").

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Tom Donnellan
Managing Director of
Bord na Móna Plc

24 May 2023