

Modern Slavery Statement for Financial Year ended 31 December 2019

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and has been adopted by Firmus Energy (Supply) Limited and Firmus Energy (Distribution) Limited (together “firmus energy”). We oppose slavery and human trafficking in all its forms and make this statement to set out the steps that firmus energy has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. firmus energy has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

1) Our Business

firmus energy is responsible for the construction and operation of a natural gas network of over 1,500km across more than 30 cities, towns and villages across Northern Ireland. As well as supplying customers across its own licensed area, firmus energy also competes in the Greater Belfast natural gas market.

firmus energy’s financial year with reference to this statement ended on the 31st December 2019.

2) Our Policies

firmus energy operates a number of internal policies to ensure that it is conducting business in an ethical and transparent manner. These include:

1. Recruitment policy: We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will;
2. Employee controls: All employees are on full written contracts of employment with pay and conditions of a high standard and above legislative requirements;
3. Whistleblowing policy: We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals; and
4. Code of business conduct: This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

3) Our suppliers

firmus energy operates in the highly regulated utility sector. firmus energy is committed to ensuring transparency in all dealings with suppliers. The Company expects the same standards from our contractors and suppliers, as part of our procurement processes.

firmus energy require all prospective suppliers to complete the relevant documentation at supplier setup stage. If the documentation is not populated to a satisfactory level, firmus energy will not accept

goods or services from this supplier. The documentation details firmus energy's expectations and requirements regarding the Act. By returning the respective documentation, suppliers are stating their agreement that they are fully compliant with the Act.

4) Training

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and business, we provide training to our staff. During the year ahead, firmus energy will be conducting refresher training for the procurement/buying teams and other staff members within the business to ensure continued understanding of the signs of modern slavery and what to do if it is suspected that it is taking place within the supply chain.

5) Our performance indicators

firmus energy will know the effectiveness of the steps taken to ensure that slavery and/or human trafficking is not taking place within the business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

6) Approval for this Statement

This statement was approved by the Board of Directors on 26th May 2020.

Name: Michael Scott, Managing Director.

Signature:

A handwritten signature in black ink, appearing to read "MS" followed by a stylized flourish.

Dated: 26th May 2020