

## **National Grid Global Corporate Policy on Political Contributions**

National Grid does not give financial donations or support to political individuals, representatives, parties or causes in any country in which we operate. However, National Grid has federal and New York State employee political action committees that donate to political campaigns. No employee or director is required or authorised to make direct or indirect contributions or any form of inducement to political action committees, political parties, individual politicians or government employees on behalf of the company.

### **What does this policy cover?**

Political contributions are defined as any gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing any election for office or any period in office; for the avoidance of doubt, this includes donations as defined for the purposes of the UK Political Parties, Elections and Referendums Act 2000. They include in-kind contributions (goods, commodities or services instead of money). Contributions by National Grid's employee's Political Action Committees (PAC) are not affected by this policy. See below for further information on National Grid USA's PACs. This policy forms part of the broader political activities framework set out in National Grid's Political Activities Guiding Principles document [\[LINK\]](#).

### **Who should you read this?**

This policy applies to all company employees, temporary staff, agents and contractors worldwide, as well as all third parties acting on our behalf. Those who violate this policy will face disciplinary action up to and including dismissal. The Company Secretary will ensure the Annual Report states our policy of not making political contributions. Any inadvertent contributions will be reported in the Annual Report, which will also contain an explanation of any contributions by National Grid's employee political action committees.

### **Company-wide Requirements**

Given the broad definition of a 'political' organisation under certain laws, operating companies who are concerned that they may be considering a political contribution must check with the Company Secretary and General Counsel that the contribution is not a political contribution under relevant laws (and therefore contrary to this policy) before proceeding.

### **US-specific Provisions**

Consistent with [federal](#) and [New York](#) campaign finance law, National Grid US operates two employee-funded Political Action Committees (PAC). Neither PAC accepts Company donations. Applicable law and Company policy prohibit coercion of all forms with respect to employees' decisions whether to support the PACs. A governing board of PAC members who work in a range of divisions of the US operating unit determines how the PACs distribute funds to campaigns or other political recipients. The National Grid federal and New York PACs are separate legal entities from the Company; PAC contributions are not political donations by the Company. All of the Company PACs' contributions are publically available in accordance with federal and New York campaign finance law. An independent auditing firm audits the Company's PACs every three years.

In line with the US Lobbying Disclosure Act, we provide details of our federal lobbying activities and expenditures in periodic reports to the Secretary of the Senate and the Clerk of the House of Representatives. These reports also disclose the names of, and political contributions by, National Grid employees who meet the lobbyist registration threshold. All registrations and reports are available to the public [here](#). We meet the lobbying compliance requirements in each of the states in which we operate.

#### Employees Acting in a Personal Capacity

National Grid employees are free to engage in the political process on any level, with no restriction by the Company, in their personal capacities, during personal time, and away from Company facilities. Company policy requires US employees and directors who engage in personal political activities to ensure their involvement does not, in any way, claim to represent the views of National Grid or bring the Company into disrepute.