nationalgrid

Supplier Human Rights Toolkit (2026)



A message from our Chief Procurement Officer

At National Grid, our vision is to be at the heart of a clean, secure and affordable energy future. Delivering this future means putting people first whether they are working within our organisation or across our supply chain. Our human rights policy and supplier code of conduct guide how we approach this: with a commitment to responsible business practices, decent work, and inclusive growth. We are committed to ensuring the energy transition is free from exploitation and firmly underpinned by our responsible business fundamentals.

While labour exploitation has no place in our business or supply chain, we also recognise that many of our suppliers, particularly small and medium-sized enterprises, may not have the dedicated resources or in-house expertise to address these risks alone. That is why we're committed to walking this journey together.

This toolkit is designed to offer practical support not just principles. If something does not look right, we want you to feel confident that you can act.

The toolkit includes proportionate information to help you recognise warning signs, take appropriate steps, and understand your role in the escalation process. You will find quick-reference guides, definitions, checklists, and case studies. Where deeper knowledge is needed, we've signposted trusted external resources.



Simon Harnett
Chief Procurement Officer



Human Rights Policy
Supplier Code of Conduct

Executive summary

This toolkit is designed to help National Grid's suppliers understand and respond to risks of potential human rights exploitation in their operations and workforce. It provides practical guidance, and signposts to expert resources. The toolkit is not intended to replace a suppliers current processes or procedures, but to complement them and be used where most appropriate.

Why this matters

Anti-labour exploitation is a serious human rights issue that affects workers across many sectors. National Grid is committed to a secure, inclusive, and responsible supply chain as part of our broader vision for a clean and fair energy transition.

What this toolkit offers

Clear actions, real-world case studies, ready-to-use templates, and practical tools to help you spot, respond to, and report signs of exploitation no matter the size of your business.

Who it's for

All suppliers, particularly Small Medium Enterprises, who may not have dedicated capacity or expertise on these issues, but want to take meaningful actions.

How to use it

- Start with immediate actions if someone may be at risk.
- How to identify potential human rights issues and apply industry best-practice frameworks to prevent exploitation.
- Use definitions and signs to understand common indicators of exploitation.
- Refer to taking proactive steps to strengthen your readiness and support worker voice.
- Follow the escalation process to know what to do if an incident occurs.
- Use the incident reporting checklist to guide your response and ensure key steps are not missed.
- Explore the Human Rights Escalation template if you wish to raise a concern regarding any potential human rights issues.
- Review the Appendices and Contact Information page for in-depth guidance, case study and external resources.



Definitions & signs

Definitions

Labour exploitation	A term that covers serious forms of exploitation where people are controlled, abused, or forced to work. This includes forced labour, human trafficking, debt bondage, and servitude.
Human rights	When the potential or actual negative impacts on human rights that are linked to a company's operations, products, or services.
Forced labour	When someone is made to work against their will, often through threats, violence, or punishment.
Human trafficking	The movement or control of people through force, fraud or coercion, often for labour, sex work or other forms of exploitation.
Debt bondage	When someone is forced to work to repay a debt, often under unfair or impossible terms that trap them in exploitation.
Child labour	Work that is dangerous or harmful to children, or that interferes with their education and development.
Exploitation	Taking advantage of people through unfair, abusive or illegal work conditions, often for financial gain.
Vulnerability	Personal or situational factors that make someone more likely to be exploited, such as language barriers, migration status, poverty, or lack of legal protections.

Signs of labour exploitation

Appearance	• Signs of physical or psychological abuse. • Look malnourished or unkempt. • Appear withdrawn.
Possessions	• Have no travel documents/passports. • Few or no personal possessions. • Always wear the same clothes. • Clothes not suitable for their work.
Manner	• Reluctance to seek help. • Avoid eye contact. • Appear frightened or hesitant to talk.
Isolation	• Restricted freedom of movement. • Rarely allowed to travel alone. • Seem under control/influence of others.
Living conditions	• Living in dirty, cramped or overcrowded accommodation. • Living and working at the same address.
Time	• Unusual travel times. • Dropped off/collected for work on a regular basis, either very early or very late at night. • Work excessive hours.

Identification of exploitation framework

Is it a human rights issue?

Does it involve:

- Forced labour or child labour?
- Unsafe working conditions?
- Discrimination or harassment?

Does it impact:

- Health, safety, dignity?
- Freedom of association or fair wages?

Does it breach:

- Local laws, regulation and or International human rights standards?

This framework helps you identify potential human rights risks, assess their severity, and take appropriate action to prevent and remediate exploitation.

Assess & analyse the situation

Evidence & documentation:

- Worker interviews.
- Documentation. e.g., timesheets, attendance logs, working hours and rest periods.
- Site observations.

Identify the severity:

- Examine scale and scope.
- Is harm irreversible.

Map affected groups:

- Direct workers.
- Agency labour.
- Subcontractors.

Consult stakeholders:

- Worker representatives.
- Unions.
- Non-Government organisations.

Remediate & prevent

Provide remedies:

- Offer support and compensation to those affected.

Implement corrective actions:

- Fix root causes to prevent recurrence.

Strengthen policies:

- Improve policies and practices to protect rights.

Sources & standards

United Nations Guiding Principles on Business & Human Rights (UNGPs)

Defines how to identify and assess human rights impacts.

The International Labour Organisation Labour Standards

Provides definitions of forced labour, child labour, discrimination, working conditions.

Universal Declaration of Human Rights (UDHR)

Provides a framework of rights used to identify and assess potential or actual human rights risks and impacts in business activities.

The Organisation for Economic Co-operation & Development Due Diligence Guidance/MNE Guidelines

Defines severity, scale, scope, and prioritisation of human rights impacts.

Incident response checklist

* If you wish to raise a concern regarding any actual or potential incident related to human rights or labour exploitation encountered in your supply chain then please complete and submit the escalation template here.

The signs of human rights issues such as labour exploitation are not always obvious. This section is designed to help you recognise potential indicators whether physical, behavioural, financial or situational. No single sign confirms exploitation, but a pattern of concerns may point to a problem.

If something does not feel right, you do not need to be certain before taking action. Seek guidance from your manager and follow the appropriate steps highlighted in the appendices link. For more in-depth guidance on managing a potential case, guidance can be found in the appendices link.

Your attention and early action could make a critical difference.

1 Respond

Ensure the immediate safety and protection of the individual.

Before moving to the next stage, ensure:

- The victim has been moved to a safe, private location.
- Basic facts have been gathered and documented accurately.
- Emergency services have been contacted if the victim is in immediate danger.
- Discretion has been maintained to protect the victim's privacy.

2 Escalate

Involve the right people and organisations to support the case.

Before moving to the next stage, ensure:

- You have identified your internal point of contact.
- You have shared the concern with your National Grid contact (e.g. Category Manager).
- Relevant authorities or agencies have been notified if required.
- You have documented all communications and actions taken so far.

3 Investigate

Clarify what happened, who is affected, and what support is needed.

Before moving to the next stage, ensure:

- You have contacted relevant NGOs or third-party services where appropriate.
- A basic support plan for the victim is in place and documented.
- Records of actions and evidence are being maintained securely and appropriately.
- You are actively cooperating with National Grid in gathering facts.

4 Remedy*

Put things right for the victim and improve future prevention.

Before moving to the next stage, ensure:

- A written remediation plan has been developed and agreed (including next steps, responsibilities, and timeframes).
- The victim's immediate and longer-term needs are reflected in the plan.
- You have committed to any required changes in your own processes or practices.
- All actions are documented and ready to implement.

5 Review

Reflect on what happened and improve the system.

- A debrief or review has taken place involving relevant stakeholders.
- Key findings and lessons learned have been documented.
- Internal processes have been updated where necessary.
- Learnings have been shared with National Grid.

Immediate actions in case of danger to individuals



Ensure Immediate safety

- **Protect the victim from potential danger:**

  If safe to do so, discretely move the victim to a secure, private location away from the potential perpetrator(s) and public areas.

- **Do not confront:**

  Avoid direct confrontation with the suspected perpetrator(s) to prevent escalating the situation.



Contact emergency services

- **Dial 999 (UK) or 911 (US):**

  To report a suspected labour exploitation incident. Clearly state that you believe a person may be in danger or under threat.

- If there is no immediate danger but concerns remain, contact the Labour Exploitation Helpline on 08000 121 700 for advice and next steps. This is a free, confidential service.



Notify key contacts

- **Internal escalation point:**

  Inform your organisation's designated internal contact such as a line manager, safeguarding lead, or incident coordinator of the situation and what actions have been taken so far.

- **National Grid contact:**

  Where appropriate, notify your National Grid Category Manager or agreed point of contact to ensure coordinated support and escalation.



Document key details

- Take note of essential information, including descriptions of the scene, individuals involved, and any statements made by the victim or others.

- Ensure that all documentation is handled securely and shared only with authorised personnel.

Ethics Helplines for National Grid contacts:

Do you feel comfortable contacting someone in the Ethics and Compliance team directly?

If the answer is **no**:

Contact the external helpline where you have an option to remain anonymous (this service is provided by an external party).

UK - 0800 298 6231
US - 1 800 465 0121

If the answer is **yes**:

Discuss your query or raise your concern with the Ethics and Compliance team. The central Ethics and Compliance teams can be contacted either directly or via the following:

UK - 0800 328 7212
US - 1 888 867 6759

Appendices & contact information

Links to appendices can be found here.
Click the link to access our Supplier Code of Conduct.
Click the link to access our Human Rights Policy.

Ethics contacts

UK
External/Focus Helpline

Freephone: 0800 298 6231
(24 hours a day, seven days a week)
nationalgrid.ethicspoint.com

US
External/Alertline

Toll-free: 800 465 0121
(24 hours a day, seven days a week)
nationalgrid.ethicspoint.com

Slave Free Alliance

UK
External/Focus Helpline

Phone: 0300 008 004
info@slavefreealliance.org

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