National Grid Global Corporate Policy on Responsible Advocacy and Political Engagement

National Grid is committed to responsible advocacy and engagement with our elected leaders across all jurisdictions in which we operate – the UK, the US, and the EU. Whilst definitions of lobbying vary across these geographies, our engagement with governments, elected representatives and officials is always conducted in a way that is appropriate for the jurisdiction in which we are based.

All our advocacy and engagement is conducted in line with the principles and the targets set out within National Grid's Responsible Business Charter.

Anti-Fraud and Bribery

National Grid has a zero-tolerance approach to bribery and corruption of any sort, as set out in our Anti-Financial Crimes Policy. We also have strict internal policies in place around gifting and hospitality.

Secondments and Employment of Former Government Officials

Across both the UK and US, National Grid is committed to encouraging all those who may want to work with us to develop their full potential. As part of this, employees may wish to undertake secondments to public bodies, just as those working at public bodies may benefit from a secondment at National Grid. We have a clear policy on this in place, including how we approach cooling off periods and potential conflicts of interest concerning secondments and permanent moves from those working in public bodies, as covered in our Employment of Former Public Officials and Secondment of Employees into Public Bodies Policy. These policies and controls govern all secondments, including the protection of information which is written into agreements. When hiring current or former government officials, we screen every application to ensure compliance with applicable post-government service cooling-off periods, contractual restrictions on who they work for when they leave, and other conflict of interest restrictions.

Political Donations

National Grid does not give financial donations or support to political candidates, representatives and other officeholders, or parties or organisations, in any country in which we operate.

However, in accordance with applicable law, National Grid operates voluntary Federal and New York State employee political action committees that raise funds from certain eligible employees and contribute them to support political candidates in the United States. Further detail is set out in our Global Corporate Policy on Political Contributions.

Further detail on our approach to advocacy and engagement in the jurisdictions within which we operate can be found below.

Political engagement

UK and EU

Our engagement with government, policy-makers and the regulator, is aligned to the enabling role the company has at the heart of an affordable, reliable and clean energy future (aligned to the legally binding net zero target, as set out in the amended Climate Change Act 2008).

Engagements with Members of the Scottish Parliament and Scottish Government, as defined by the Lobbying (Scotland) Act 2016, are logged with the Scottish Lobbying Register.

In the EU, National Grid is registered on the EU transparency register, described as "a tool to allow European citizens to see what interests are being represented at Union level and on whose behalf, as well as the financial and human resources dedicated to these activities."

US

National Grid engages with officials in the federal government and in the states and local jurisdictions where we have operations. Our political advocacy focuses on sharing our practical experience and expertise in delivering energy safely and reliably, and on working with officeholders to support an affordable and responsible energy future aligned with local and state goals. We seek to provide value equitably to our customers, shareholders and the communities we serve. We regularly engage our elected leaders on legislative and regulatory proposals that could impact our business and our customers. The Corporate Affairs and Legal departments work closely to ensure full compliance with U.S. law, including the engagement of outside counsel with expertise in these matters and the compliance obligations related to them. We require our employees to undergo training and education on both our policies and the laws or regulations specific to the jurisdictions in which they operate.

We strictly follow lobbying disclosure laws, campaign finance and gift/ethics rules. We have registered under the U.S. Lobbying Disclosure Act and in each state and local jurisdiction where lobbying disclosure laws to disclose our employees' and vendors' advocacy is required.

Trade Associations

National Grid is a member of various trade associations across the UK, US, and EU, where we strive to share our knowledge, expertise, best practices, and insights to inform the work of respective bodies. As part of our commitment to transparency, we have conducted a review of relevant organisations and assessed their alignment with climate related policy positions and commitments. Full details on our findings are in our Trade Association Review.