

Modern slavery

Our statement on slavery and human trafficking 2025



national**grid**

Introduction

In a world that's constantly evolving, we remain focused on delivering secure, affordable and clean energy for our customers and communities.

At the heart of our work is our belief that every colleague deserves safe and inclusive working conditions and fair pay. Our commitment to human rights extends beyond our company, as demonstrated by our Human Rights policy that sets expectations for fair working conditions across all of our operations and supply chains. We put this into practice with our Supplier Code of Conduct, a vital component of our supplier contracts which ensures human rights values are upheld in all partnerships. In FY25, we enhanced our procurement assessment tool that now puts human rights considerations at the centre of our decision-making processes.

To further advance our Anti-Modern Slavery Programme, National Grid is collaborating with non-governmental organisations (NGOs), including Slave-Free Alliance (SFA) and Action Sustainability (AS). Together, we are developing best practices to mitigate the risk of human rights violations and make a meaningful difference in tackling modern slavery risks in our operations and supply chain, and creating a robust escalation and remediation framework. We are also leveraging FY24 lessons learned, continuing external benchmarking with the UK's Churches, Charities and Local Authorities (CCLA) and recognising the new BSI Standard (BS 25700 Organisational Responses to Modern Slavery). Through these measures, we will continue to progress on our anti-modern slavery action plan.

This National Grid Modern Slavery Statement ("Statement"), which covers National Grid's financial year ending 31 March 2025, outlines our current and continuing commitments to combatting modern slavery under the Modern Slavery Act 2015. This Statement applies to National Grid plc and its subsidiaries listed at the end of this statement. I hereby sign this Statement on behalf of the Board of Directors of National Grid plc, following its approval in July 2025.



A handwritten signature in black ink that reads "J. Pettigrew." The signature is written in a cursive, slightly stylized font.

John Pettigrew
Chief Executive

Contact us about this statement
See National Grid's statements for previous years

Contents

1. Our progress summarised

In our Statement for FY24, this is what we said we would do:	This is what we have delivered in FY25, against the commitments we made:
Continue collaborating with SFA and AS to develop a plan for reviewing and implementing recommendations from their assessment of our Statement and approach to risk assessment and due diligence.	<p>We have integrated potential human rights risks into our third-party risk management approach based on the AS assessment. Suppliers whose products or services pose human rights implications will be required to complete an additional risk assessment questionnaire. Contracts cannot be finalised until the appropriate outcome status is verified with the relevant stakeholders.</p> <p>In collaboration with SFA, we are enhancing stakeholder engagement across our global operations to facilitate site assessments aimed at addressing modern slavery. This includes training, policy development, supply chain risk assessments, and effective grievance mechanisms to ensure workers' voices are heard and their rights are upheld.</p>
SFA will conduct on-site labour audits throughout the year, focusing on construction sites with multiple contractors.	We developed a three-year Human Rights Action Plan in partnership with SFA, who will deliver effective site-based labour assessments through FY28. We are adopting a phased, collaborative approach to build stakeholder engagement, supplier capability, and internal processes. This approach ensures practical and impactful assessments in both the US and the UK during FY26.
Review our escalation process using best practice approaches and insights from others' experiences, while ensuring adequate victim support.	To better address potential labour exploitation risks, we partnered with SFA to develop a comprehensive Modern Slavery Escalation and Remediation Framework. This framework provides guidance for colleagues and suppliers on managing modern slavery incidents and supporting victims. We will pilot this framework at high-risk sites across various supplier categories and refine it based on the feedback from these pilots.

2. Our business and supply chains

An introduction to our business and our values.

National Grid is an energy company operating in the UK and the US. We play a vital role in connecting millions of people to the energy they use. We enable the innovation that is transforming the energy system.

Our values underpin everything we do. They inform our decisions, how we show up and the way we treat each other. They shape our company and how our customers and communities experience us. When we live our values, we show National Grid at its very best.



Our purpose

is to Bring Energy to Life. We believe it is crucial to have a clear sense of what we stand for as a company.

Our vision

is to be at the heart of a secure, affordable and clean energy future.

Our values

are that every day we do the right thing, find a better way, and make it happen.

Our business units

Our business (UK)

◆ UK Electricity Transmission (UK ET)

We own and operate the high-voltage electricity transmission (ET) network in England and Wales. The Strategic Infrastructure (SI) business unit was established on 1 April 2023 to deliver major UK infrastructure projects through the Accelerated Strategic Transmission Investment (ASTI) framework.

◆ UK Electricity Distribution (UK ED)

We own and operate the electricity distribution networks for the East Midlands, West Midlands, the Southwest and South Wales. The ED business includes a Distribution System Operator (DSO) which is overseen by an independent panel.

Our business (US)

◆ New England

We own and operate electricity transmission networks in Massachusetts, New Hampshire, and Vermont. In Massachusetts, we also own and operate electricity and gas distribution networks.

◆ New York

We own and operate gas and electricity transmission and distribution networks across upstate New York. We also own and operate gas distribution networks in New York City and on Long Island.

◆ National Grid Ventures (NGV)

NGV develops, constructs, operates, and invests in energy assets and businesses across the UK and US. Its portfolio includes electricity interconnectors, competitive transmission, Liquefied Natural Gas (LNG) storage, liquefaction and regasification, battery storage, and conventional generation

◆ Other activities

Other activities primarily relate to National Grid Partners (NGP), the venture investment and innovation arm of National Grid, as well as UK Property, Insurance and Corporate Activities.



Our people

At National Grid, we truly value our people and take pride in our workforce across the globe, primarily in the UK and the US. Our commitment to maintaining the highest standards of ethical conduct is reflected in our robust policies and procedures

As a responsible business, we take pride in treating all employees fairly and ensuring they thrive in a respectful, safe, and inclusive environment. Our recruitment programme is designed to provide equal opportunities, comply with local legislation, and guarantee that all employees have the appropriate rights to work. We use employment agency partners to attract temporary workers and they are contracted to uphold the same standards of employment that we offer our direct employees. Contract Managers actively oversee these agencies, ensuring they meet our rigorous employment requirements, including relevant screenings, paying the Real Living Wage, and adhering to the “employer pays” principle, which is a commitment by employers to cover all costs associated with the recruitment of workers, rather than passing these costs onto the workers themselves. This means that no employee should ever have to pay to become a temporary or permanent worker within our organisation or supply chain.

We closely monitor our practices, believing that our policies and procedures significantly mitigate the risk of forced or trafficked labour being employed directly by National Grid or its employment agencies. In the UK, we are committed to paying our employees, trainees, and contractors working on our behalf at least the Real Living Wage, as determined by the Living Wage Foundation. In the US, we ensure that all our employees receive at least the minimum wage, with prevailing wages paid in New York. Supporting our employees and their families is a top priority. We offer comprehensive internal health and wellbeing programmes, along with access to a confidential employee assistance helpline that provides support in areas such as emotional well-being, debt management, and legal advice. We also encourage our employees to join trade unions, and, in the UK, we actively engage with them through HR to raise awareness of associated human rights risks. National Grid is building a workplace where everyone feels valued, supported, and empowered to succeed.



Workforce Disclosure Initiative (WDI)

The WDI is one of the world's leading programmes aimed at improving corporate transparency and accountability on workforce issues, providing companies and investors with comprehensive and comparable data and helping increase the provision of good jobs worldwide.

Through the programme's annual survey and engagement, they collect and process data that companies voluntarily disclose on workforce practices across their operations and supply chains. This information is shared with signatory investors, to inform their analysis, stewardship and decision making. They also share practical insights on how to address pressing workforce issues.

National Grid has completed the WDI survey for the past six years, continually enhancing our data each year. For our FY24 submission, we achieved an overall Scorecard of 85%, surpassing the Utilities sector average. We scored 100% in several key sections, including risk assessment and human rights due diligence, worker voice and representation, supply chain transparency, responsible sourcing, and supply chain working conditions.

Our supply chains

We work with over 15,500 suppliers across our global organisation. The image below illustrates Tier 1 supplier locations where spend exceeds £1 million.

Tier 1 Supplier spend (£1m+) by geographical location



You can find more information about our supply chain



3. Our policies

Our policies, summarised below, establish the standards required to prevent modern slavery in the workplace and our supply chains. These policies are supported by an internal business management system that outlines our actions and procedures, ensuring we uphold our values. We consistently monitor compliance with these policies and report our progress to the executive and audit committees.

Policy	Scope	Programme Focus
Code of Ethics	This is our company code of conduct, which applies to all employees and outlines our values as well as the expected behaviour of employees while working at National Grid.	Our code sets our stance on harassment, discrimination, bullying, sexual harassment, and human rights, outlining National Grid's commitment to a zero-tolerance policy towards all forms of human rights misconduct. Additionally, it details the channels available for raising concerns and the measures we will take to protect those who 'Speak Up' about any issues.
Supplier Code of Conduct	This document is reviewed and updated annually and distributed to all our suppliers. It outlines the standards to which we expect our suppliers to adhere to and encourages them to extend these standards throughout their own supply chains while working with National Grid.	Our code sets out our expectations for suppliers regarding key international labour standards, including the Ethical Trade Initiative Base Code, the UK Real Living Wage requirement, and the New York Prevailing Wage. We urge all suppliers to publish a modern slavery statement, regardless of their legal obligations.
Recruitment (internal)	Our internal recruitment policies guarantee that employees receive equal opportunities, possess the necessary rights to work, and are hired in accordance with all legal requirements.	Our implemented recruitment checks protect human rights by reducing the risk of directly hiring individuals who are being trafficked or forced to work.
Disciplinary (internal)	This policy outlines the actions that will be taken if employees intentionally violate the requirements specified in the Code of Ethics.	All employees know what is expected of them and the consequences for misconduct including human rights violations.
Anti-Financial Crimes Policy	This policy sets out our commitment to prevent financial crime and corruption. It applies to all employees and those who work on our behalf.	Establishes the responsibility of all employees to remain alert to and report any suspicious activities or payments, which could potentially relate to human rights violations.
Contracted Service Provider Background Checking Policy	This policy outlines the requirements for conducting background checks on contractors working for or on behalf of National Grid.	Conducting thorough background checks helps identify individuals with histories of involvement in human trafficking or forced labour. This reduces the risk of employing individuals who might perpetuate these abuses.
Human Rights Policy	This policy outlines the process for raising concerns and how the company responds to them. It details the steps for reporting a concern and the protections that reporters can anticipate.	The commitments outlined in this policy guarantee that we maintain internal governance and oversight of the necessary controls, supporting the provision of decent working conditions for all individuals working for or on behalf of National Grid.
Group "Speak Up" Policy	This policy outlines the process for raising concerns and how the company responds to them. It details the steps for reporting a concern and the protections that reporters can anticipate.	The policy is applicable to all employees, contractors, and any other individuals working for or on behalf of National Grid and its subsidiaries.
Sanctions & Recusal Policy	Outlines the company policy and guidance to assist National Grid employees in complying with relevant economic sanctions laws and regulations.	National Grid has established processes to screen parties to ensure that we do not engage in business with individuals or entities that have been sanctioned, including those sanctioned under US, UK, and EU sanctions regimes related to human rights.

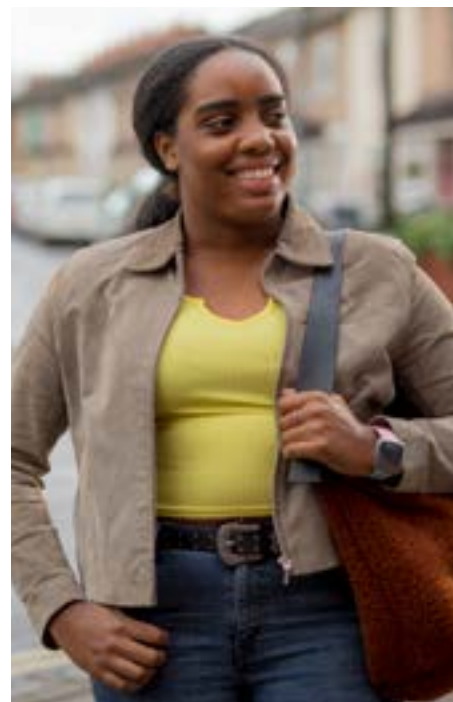
Responsible Business Charter

Our Responsible Business Charter is built on three core pillars: our environment, our customers and communities, and our people. These pillars are supported by our responsible business fundamentals. Responsible business practices are integral to our purpose, embedded in our values, and reflected in our strategic priorities.

Our responsible business fundamentals include commitments to:

- **Compliance and Ethical Business:** We adhere to our Code of Ethics, shaped by our values and behavioural expectations, ensuring compliance and ethical conduct in all our activities.
- **Promoting and Respecting Human Rights:** We uphold our Human Rights policy, promoting and respecting the rights of everyone working with us.
- **Decent Working Conditions and Fair Pay:** We provide an inclusive, safe, and supportive working environment.

Our Responsible Business Charter ensures that we conduct our business with respect, fairness, and accountability. By embedding these principles into our operations, we actively work to mitigate the risks of slavery and human trafficking.



Social Mobility Initiatives at National Grid

Social mobility initiatives can play a crucial role in protecting individuals from human trafficking and exploitation by addressing the root causes of vulnerability and providing opportunities for upward mobility. The initiatives include education and skills development, economic empowerment, awareness and advocacy, support networks, policy and legal reforms, and access to essential services.

In FY25, we are proud to continue to be recognised on the Social Mobility Index (SMI) as one of the top 50 employers in the UK, leading the charge in promoting social mobility and creating equitable outcomes for everyone, which helps prevent individuals from becoming vulnerable to human trafficking. We have made significant strides this year, improving our ranking to 42, up from the previous year.

At National Grid, we believe in the power of collaboration. Through these partnerships, we shine a spotlight on the exciting employment opportunities related to Net Zero, empowering overlooked talent to apply for roles at National Grid.

Our initiatives not only open doors for individuals but also play a crucial role in safeguarding vulnerable members of our communities from exploitation. Together, we are building a brighter, more inclusive future where everyone has the chance to thrive.

The groups and associated programmes are detailed below.

Access Programme: For 16-18-year-olds in schools and colleges in under-served areas, providing promotion of and coaching for apprentice and trainee opportunities.

Excel Programme: For undergraduate high achievers from low or zero-income backgrounds, offering promotion and coaching for graduate opportunities.

Accelerate Programme: For individuals aged 25+ who have relevant skills and workplace experience but have been out of employment for more than seven years, focusing on reintegration into the workforce.



To help support and protect those members of our communities that are most at risk from exploitation, National Grid is privileged to work with Catch 22 (a not-for-profit organisation with a social mission). This organisation embeds regular direct work visits and trial work experience sessions for selected cohorts of care-leavers and those at risk of different forms of exploitation.

Young people referred by Catch 22 come from immensely challenging backgrounds. National Grid believes that by providing frequent and skill-specific experiences for these people and showing them a taste of working life, we begin to prepare them better for future opportunities. By demystifying what it takes to secure employment in large organisations and giving them the beginnings of a professional network, they can receive the support, mentoring and guidance they need.

Our Social Mobility Partners

Access:

Catch 22, Young Enterprise

Excel:

Generating, Genius, RAE GEEP, IET

Accelerate: STEM Returners

4. Risk assessment

Controls Framework

We have developed a Controls Framework using the Modern Slavery Due Diligence Checklist from the Supply Chain Sustainability School (SCSS) and the ETI Modern Slavery Statement Framework. This framework includes a checklist covering key areas to understand and address potential modern slavery risks in our operations and supply chains. It consists of various modern slavery and human rights questions, including:

- People
- Policy
- Leadership & Governance
- Risk & Opportunity Assessment
- Measurement
- External Engagement
- Procurement Process
- Recruitment

We objectively score ourselves and our suppliers against these questions based on financial and reputational impacts, including key control frameworks to prevent potential labour risks in our operations and supply chains.

For some of our key infrastructure projects in the UK, we have adopted the BREEAM (Building Research Establishment Environmental Assessment Method) Infrastructure standard. This award scheme aims to improve the sustainability of projects and requires evidence of compliance with various criteria, including ethical labour practices. It helps drive awareness at the project level and raises the profile of the importance of this topic within the wider business.

Risk Assessment

As part of our strategic sourcing process, we have incorporated anti-modern slavery considerations into our

procurement sustainability assessment tool, informed by the NGO risk assessment.

Risk Assessment and Management

Aligned with the Global Industry Classification Standards (GICS) and National Grid's procurement categories, our procurement sustainability tool identifies risks related to social and environmental factors by category type. This tool provides tailored questions for sourcing events, prompting suppliers to offer detailed insights into their policies, procedures, and due diligence frameworks supporting our human rights policy. This includes critical aspects of human rights, modern slavery, and sustainable procurement practices.

We have integrated this tool into our main sourcing system, enhancing transparency and accessibility for our category

teams in the US and UK. This integration allows them to better understand supplier frameworks and practices aimed at preventing modern slavery.

National Grid will evaluate these responses to ensure suppliers effectively identify, prevent, and mitigate risks, addressing potential human rights impacts. This collaborative approach with our value chain—from conception to delivery—meets our operational needs while actively promoting and protecting human rights, reinforcing our commitment to ethical business practices.

Processes and Procedures

We have conducted a comprehensive review of our suppliers' modern slavery risk assessment processes, extending beyond the initial pre-qualification stage. In FY25, we partnered with AS to perform a gap assessment of our sustainable procurement practices in line with BS 25700: Organisational Response to Modern Slavery. This risk assessment highlighted categories with inherent human rights risks, such as low-paid or low-skilled work, temporary labour, vulnerable demographics, and materials or activities from high-risk countries. These insights have clarified which categories require prioritisation for human rights due diligence, including products and services for our

network equipment, network construction, High Voltage Direct Current (HVDC) links, and Indirect Operations. Recognising the potential human rights risks within our supply chain, we have collaborated with SFA to develop escalation processes and remediation frameworks. These tools enable us and our partners to respond effectively to potential modern slavery incidents within our operations or supply chains. A human rights escalation framework will also be available on our suppliers' webpage in 2026.

5. Due diligence

We are collaborating across the industry and actively engaging with our suppliers to enhance our strategies for identifying and mitigating potential risks of exploitation. Together, we are creating a safer and more ethical environment for everyone involved, ensuring that our collective efforts lead to meaningful change and protection for those at risk.

At National Grid, we are committed to ensuring that our procurement practices meet compliance standards and actively promote ethical sourcing and human rights. To achieve this, we pre-qualify our strategic UK procurement activities through the Utilities Vendor Database (UVDB), a robust vendor registration system operated by Achilles. As members of the 'Utilities Against Slavery' Working Group, we have successfully implemented enhancements to the onboarding questions related to modern slavery, ensuring our approach goes beyond compliance to reflect our dedication to ethical practices.

Our commitment extends to our US suppliers as well, where we are collaborating with our strategic sourcing team to enhance qualification processes using relevant systems and controls. This proactive approach ensures that, in addition to meeting our regulatory requirements, we are fostering a culture of responsibility and transparency.

To safeguard our supply chain, we monitor external media and utilise a comprehensive screening service to identify any adverse reports, fines, or sanctions against our direct suppliers. Our process allows us to address any issues promptly, conducting initial risk assessments and escalating high-risk concerns to the appropriate teams. This collaborative effort ensures that we take action, particularly in cases of modern slavery-related prosecutions or investigations, which are classified as high risk.

We prioritise our critical suppliers through a third-party risk management system, which evaluates various risk factors, including modern slavery and adverse media, as part of the overall risk score. This enables us to focus our resources on suppliers who align with our values.

Our incident management procedure is designed to thoroughly investigate any non-compliance by suppliers with legislation, regulations, and our Supplier Code of Conduct, including modern slavery issues. We believe in holding our partners accountable and ensuring that they share our commitment to ethical practices.

In our ongoing efforts to enhance our assurance processes, we have integrated human rights checks and conducted tests within our UK operations. So far, these checks have not revealed any issues, but we are dedicated to identifying and targeting higher-risk work sites, particularly those with a significant volume of contracted employees.

Recognising the growing demand in the offshore industry, we have implemented a self-assessment process for vessels conducting marine surveys and offshore construction. This initiative is embedded into our marine assurance and operations management systems, ensuring that we maintain high standards of compliance and responsibility.

Looking ahead, we are planning to assess the controls that our key UK and US facilities suppliers have in place to identify and address potential risks. We understand that ancillary services (e.g., logistics and transportation) often carry a higher risk due to the nature of the work and the potential for higher turnover of contracted employees. We aim to create a more resilient and responsible supply chain to meet our customers' needs and uphold our commitment to sustainability and ethical practices.



Strengthening human rights due diligence in construction

Commitment and Culture

In our commitment to enhancing our operations, we partnered with SFA to establish clear parameters for selecting eligible sites throughout FY25. This collaborative effort ensures that we gather the most relevant and comprehensive data for our assurance processes, all while keeping the process simple, easy to implement, and manageable for our operations.

The criteria we set forth include:

- **Diverse Site Activities:** We focused on sites engaged in a variety of construction and installation activities, such as groundworks and equipment installation. By encompassing a wide range of services and a diverse workforce—from highly skilled professionals to unskilled and casual labour—we aim to create a richer and more comprehensive data set that will strengthen our assurance efforts.
- **Robust Workforce Presence:** We prioritised sites that host at least 100 workers, representing a minimum of three different companies. This approach enhances quality of our data and reflects the collaborative nature of our industry.

Through these carefully defined parameters, we are setting the stage for meaningful insights that will drive our commitment to excellence and accountability in all our operations.

Designed Action Plan and Site Audit Schedule

We are laying the groundwork for a safer and more ethical future in our construction practices. We at National Grid are dedicated to enhancing our human rights approach in construction by embedding compliance risk standards across all our sites. The three-year action plan includes:

- **FY25:** Building strong policies and processes, clarifying escalation and remediation pathways, engaging operations, and reaching out to suppliers.
- **FY26:** Strengthening due diligence, supplier engagement, and site-level capability building.
- **FY27:** Embedding industry-leading practices across operations and supply chains.



The capability-building site engagements are a crucial component of this strategy. They ensure that on-site teams are well-supported and equipped to effectively identify and manage modern slavery risks. This includes:

- **Fair recruitment:** Ensuring workers are hired ethically and not subject to exploitative conditions.
- **Labour providers:** Use of labour providers and subcontractors who do not increase risk exposure.
- **Worker welfare:** Managing work hours, pay conditions, and on-site accommodation.
- **Escalation pathways:** Embedding clear reporting and remediation processes.

To reinforce this culture, we have launched an innovative remote human rights capacity-building engagement with SFA and a Tier 1 supplier at one of our largest construction sites in Northern New York. This site was the first to meet our established criteria. The engagement focuses on training, policy development, supply chain risk assessments, and effective grievance mechanisms, ensuring that worker voices are heard, and their rights are upheld.

New York Trial to Establish Enduring Process

The feedback from the New York trial goes beyond merely refining our own processes; it is about forging strong partnerships with suppliers, contractors, and industry allies to ensure that everyone is given the capacity to uphold ethical working conditions on-site. By adopting a collaborative, phased approach, we are cultivating the trust

and capability essential for site-based labour assessments to be both practical and impactful.

The insights we gather from this assessment will directly shape our broader due diligence framework, ensuring that future evaluations are grounded in best practices, aligned with supplier capabilities, and developed through a shared sense of responsibility. By prioritising partnership and long-term engagement, we are embedding anti-modern slavery, and labour rights due diligence into the very fabric of our business practices, not as a one-time audit but as an ongoing commitment to fostering ethical supply chains. The same approach will be refined and replicated on our eligible UK construction sites in FY26.

Working together to improve industry standards

At National Grid, we are committed to raising industry standards through collaboration and knowledge exchange. By sharing best practices and learning from peers and experts, we aim to achieve significant improvements across the sector.

We actively engage with various organisations through industry groups to discuss key areas for collaboration and action. Our commitment to continuous improvement is reflected in our ongoing benchmarking research, which allows us to integrate best practices into our approach wherever applicable.

As members of multiple working groups, we are dedicated to driving change on a broader scale. We consistently engage with industry partners to explore effective strategies for addressing the risk of modern slavery. Together, we can create a more responsible and sustainable future, ensuring that our customers can trust in the integrity of our supply chain and the ethical practices that underpin it.

Here are the highlights:

Action Sustainability (AS)

The AS peer learning group focuses on human rights by serving as a shared knowledge platform to enhance best practices among its members. The group's objective is to leverage shared experiences to develop frameworks that yield the best results in the context of human rights.

By fostering collaboration and communication, the group aims to drive sustainable change and promote a culture of learning and improvement within the industry. This initiative encourages members to share insights and strategies, contributing to a more informed and effective approach to human rights issues within their operations.

United Nations Global Compact (UNGC) Modern Slavery Working Group

As signatory members of UNGC, we participated in their Business and Human Rights Accelerator programme to increase our awareness of the key considerations whilst also providing guidance on how an organisation can develop their strategy for managing any actual or potential risks associated with modern slavery.

Supply Chain Sustainability School (SCSS)

We have been actively involved in the SCSS Built Environment Against Slavery Group and were the first client-level signatory to the People Matter Charter, alongside many of our main contractors. We have also contributed to prioritising the key focus areas of the Built Environment Against Slavery Group in line with our business supply chain sustainability strategy. These primary priorities include:

- Developing due diligence maturity guidance.
- Creating a standard approach to supply chain mapping.
- Making existing resources more accessible, including learning pathways and a new search function for the SCSS members to find resources aligned with various aspects of modern slavery due diligence.
- Showcasing strategic approaches to combatting modern slavery to our industry peers.
- Collaborating to drive impact.

We also contributed to the development of the SCSS Practical Guide to Understanding Modern Slavery Risk in Supply Chains, which provides a consistent approach to risk assessment. This guide includes examples of how to apply it to key categories of spend such as:

- Material Categories: steel, Personal Protective Equipment (PPE), wind turbines, batteries, stone.
- Subcontract/Service: ground workers, labour agencies, cleaning services, security, waste.

The guidance covers different approaches for Subject Matter Experts (SMEs), 'New Beginners,' and mature organisations. We continue to promote the use of the SCSS resources and tools both internally and within our supply chain.

Slave-Free Alliance (SFA)

As members of SFA, we benefit from access to valuable tools and resources, as well as an assessment of our modern slavery strategy. As a trusted partner to National Grid, SFA provides practical guidance to ensure our construction sites and supply chains are resilient, compliant, and uphold worker dignity.

Together, we are conducting a US capability site engagement exercise to enhance our understanding of site-level risks and opportunities without disrupting operations. This initiative is part of a three-year action plan aimed at strengthening supplier assessments and improving data utilisation.

Utilities Against Slavery

We are members of 'Utilities Against Slavery,' an industry group facilitated by SFA, with the objectives of:

- Raising awareness to prevent the exploitation of workers and the community.
- Sharing best practices among the group's members.
- Collaborating to produce a coordinated response to reducing risks in supply chains.

We have been actively involved in helping the organisation define the core priorities for the utility sector. We are supporting the development of a joint strategy that can help us benchmark, address, and learn from similar opportunities and issues within our respective supply chains. For example, we invited First Solar to one of our scheduled meetings to share their experience on identifying unethical

business practices in their supply chain and addressing remediation. Lessons learned from First Solar have supported the objectives of the working group.

Monitoring and Continuous Improvement

We continually monitor and consider the wider landscape and evolving standards, regulations, and legislation, including:

- The new British Standard on Modern Slavery, **Organisational Response to Addressing Modern Slavery Risks. Guidance – BS25700**, which provides organisations with guidance on managing modern slavery risks in their operations, supply chains, and wider operating environment.
- The new UK Procurement Policy Notice, **PPN 02/23: Tackling Modern Slavery in Government Supply Chains**, which outlines how UK Government departments must take action to identify and manage modern slavery risks in government supply chains.
- The **EU Directive on Corporate Sustainability Due Diligence**, which aims to foster sustainable and responsible corporate behaviour and anchor human rights and environmental considerations in companies' operations and corporate governance.
- The proposed **Commercial Organisations and Public Authorities Duty (Human Rights and Environment) Bill**, which aims to oblige companies to prevent human rights and environmental harms "so far as is reasonably practicable" in their own operations, products, and services, those of their subsidiaries, and throughout their value chains.
- The **Transparency in Supply Chains (TISC) Statutory guidance**, which is the UK Government's guidance for organisations on ensuring that modern slavery is not taking place in their business or supply chains.

6. Training and awareness

Promoting an open culture

We provide training to our employees and continually promote a 'Speak Up culture', which we measure through our employee engagement survey.

Speaking up

We champion openness and transparency, offering multiple avenues for all employees and those working on our behalf to raise concerns. Our confidential helplines are available globally, operating 24/7, ensuring that support is always just a call or click away. Details about these helplines can be found on our website, in our Code of Ethics, and our Supplier Code of Conduct.

To reinforce our commitment, we actively promote our Code of Ethics and the supporting 'Speak Up' policy. We provide clear information on how to report a concern, what details to include, and what to expect during the process. We are updating our supporting literature and exploring innovative ways to ensure easy access to our 'Speak Up' contact details for colleagues and those working across our sites. We take all allegations of unethical or illegal behaviour very seriously. Our dedicated ethics teams and professional investigators manage all reported concerns with sensitivity and diligence. We conduct independent investigations and take appropriate action based on the findings. An overview of the allegations received by the Ethics team, along with their outcomes, is reviewed by our Group Ethics, Risk & Compliance Committee, which includes senior leaders responsible for overseeing the company's ethical standards and monitoring the effectiveness of our 'Speak Up' programmes.

Each year, we track supporting metrics through our employee engagement survey and provide summaries of these metrics, allegations, and findings to our Business Unit and Function-led Ethics, Risk & Compliance Committees, as well as our Audit & Risk Committee. Regular updates on our ethical programmes, including anti-modern slavery initiatives, are also shared.

We encourage everyone to use our helplines, available 24/7 by phone or weblink, for raising concerns, asking questions, or seeking advice. Our recent employee engagement survey revealed that 80% of our workforce feels confident that National Grid addresses instances of unethical behaviour consistently and effectively. This feedback fuels our commitment to maintaining a culture of integrity and accountability.

Together, we are building a workplace where everyone feels safe to speak up, ensuring that our values are upheld and that we continue to operate with the highest ethical standards.

Training and awareness

Our induction programme immerses new starters in our company values and Code of Ethics from day one. Our commitment extends beyond initial training; we provide ongoing mandatory training for all employees on essential topics related to our Code. Key elements of our Code are integrated into our Supplier Code of Conduct (SCoC), reflecting our proactive approach to combatting modern slavery.

Our Procurement activities and controls are centrally managed for all National Grid business units, including all subsidiaries listed at the end of this statement. We are dedicated to continuously upskilling our procurement professionals, raising awareness of potential modern slavery risks within our value chain, and empowering them to contribute to prevention efforts. This commitment has led to the development of Sustainability Foundation Level Training, with additional sessions planned to focus specifically on modern slavery and human rights. We are collaborating closely with the SCSS to strategise and deliver better outcomes for our customers.

To further enhance awareness, we have delivered training to key roles within the Safety, Health & Wellbeing and Environment & Sustainability (SHES) team in the Strategic Infrastructure and Land & Property business areas. This training provides an overview of modern slavery and introduces the assurance checks incorporated into our assurance system. We will continue this effort, taking a risk-based approach to identify further areas across the organisation where we can utilise existing site visit assurance programmes.

We actively encourage our suppliers to take advantage of the free training and resources available through the SCSS. We consistently promote the use of modern slavery learning pathways, resources, and tools available in the SCSS, ensuring that everyone in our supply chain is equipped with the necessary knowledge.

As part of a collaborative working group within the SCSS, utility sector clients are uniting to provide clear direction for addressing modern slavery risks within their value chains. Together, we have created several learning pathways on key topics, including modern slavery, which we have promoted throughout our supply chain. Adoption of these resources can be tracked through our priority supplier dashboard, ensuring accountability and progress.

7. Measuring our effectiveness

We currently monitor several key measures to assess our progress and programme effectiveness. To strengthen our approach, we are collaborating with AS and SFA to review and enhance our KPIs, ensuring they provide meaningful insights and drive impactful actions.

We regularly benchmark our performance against peers with the assistance of an external NGO. Specifically, CCLA (the UK's largest charity fund manager) benchmarks the Modern Slavery Statements of the FTSE 100. In November 2024, CCLA's Modern Slavery Act report placed National Grid in Tier 2 (Evolving Good Practice). Based on our benchmarking, we believe that our statement and programme are consistent with those of our peers.

Measure	Reason for measure	FY22	FY23	FY24	FY25
Number of potential human rights concerns escalated through our supplier screening process.	We continuously monitor adverse media reports within our supplier population, using screening tools to detect these issues. This approach helps identify any modern slavery concerns, allowing us to implement appropriate actions and controls.	1	0	0	1**
Number of modern slavery concerns reported through our confidential helplines.	Details of our confidential helplines are available to employees, suppliers, and the public, providing an avenue for reporting any ethical concerns. We continuously monitor all reports and use the information to identify potential control weaknesses and improve our processes.	1	0	0	1**
Number of related issues reported through alternative channels.	Details of any related issues received outside formal reporting channels.	0	0	1*	0
Percentage of our top 25 supplier organisations (by spend) with a publicly available Modern Slavery Statement or equivalent policy.	This serves as an additional measure to monitor the actions our suppliers are taking to address the risks of modern slavery in their supply chains.	-	48%	80%	84%

*This concern was self-reported by First Solar. For more details, please refer to [the National Grid Modern Slavery Statement FY24](#).

**BYD, a global leader in electric vehicles and battery technology, supplies cars for our UK car leasing programme. Brazilian authorities halted construction of a BYD factory due to workers living in conditions akin to slavery. Although National Grid does not have a direct contractual relationship with BYD, our procurement team requested assurances from BYD regarding their support for the affected workers. Procurement continues to monitor our supply chain.

8. Focus areas for FY26

We recognise the importance of continuous improvement and remain committed to strengthening our approach to human rights due diligence in our business and supply chains. Over the past year, we have deepened our understanding of the practical challenges and opportunities in managing modern slavery risks, and we are building on this foundation to develop a structured, long-term approach.

In collaboration with SFA, we have developed a three-year action plan that sets out a phased, strategic approach to embedding robust labour rights protections across our operations and supply chain. This plan includes a programme of supplier engagement, risk-based site assessments, and continuous capability-building, ensuring that our commitments are both realistic and impactful.

Our focus for FY26 will be to lay the groundwork for effective implementation, including:

- Rolling out the first phase of our three-year action plan, working with SFA and AS to integrate recommended Key Performance Indicators (KPIs) into contract management processes for high-risk categories based on their assessments into our modern slavery risk assessment and due diligence processes.
- Expanding our human rights due diligence activities, including targeted site-based assessments and engagement with key suppliers, ensuring that future human rights capacity-building exercises are built on a foundation of strong supplier relationships and operational readiness.
- Refining our escalation and remediation framework to ensure that any potential labour exploitation risks are managed effectively, with clear processes for incident response, victim support, and continuous learning.

By maintaining a measured and strategic approach, we ensure that our efforts remain sustainable, collaborative, and aimed at creating long-term impact.

Governance

Our Group Ethics, Risk & Compliance Committee evaluates our approach to modern slavery. They receive annual reports on our performance, provide guidance on future priorities, and review and enhance the actions we take to improve our practices and those of our suppliers.

To learn more or provide feedback on our statement, contact us



The statement applies to National Grid plc and the following subsidiaries.

UK

National Grid Holdings One plc
Lattice Group Limited
National Grid Holdings Limited
National Grid Grain LNG Limited
National Grid Electricity Transmission plc
National Grid Interconnectors Limited
National Grid Electricity Distribution plc
National Grid Electricity Distribution (East Midlands) plc
National Grid Electricity Distribution (West Midlands) plc
National Grid Electricity Distribution (South West) plc
National Grid Electricity Distribution (South Wales) plc
National Grid Helicopters Limited
National Grid Electricity Distribution Property Investments Limited
National Grid Telecoms Limited

US

National Grid USA
Boston Gas Company
The Brooklyn Union Gas Company
KeySpan Gas East Corporation
Massachusetts Electric Company
Nantucket Electric Company
Transgas Inc.
Niagara Mohawk Power Corporation
National Grid Generation LLC
New England Power Company
National Grid LNG LLC
National Grid Port Jefferson Energy Center LLC
National Grid Glenwood Energy Center LLC
New England Electric-Transmission Corporation
New England Hydro-Transmission Corporation
New England Hydro-Transmission Electric Company, Inc.
National Grid North America Inc.

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