

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 or supplier code of conduct guide how we approach this: with a commitment to responsible business practices, decent work, and inclusive growth. We know that an energy transition, to be effective, must also be free from exploitation and 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



# 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, signposts to expert resources, and explains how National Grid can support you at each step.

## 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 just 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 exploitation framework.
- 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 for 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

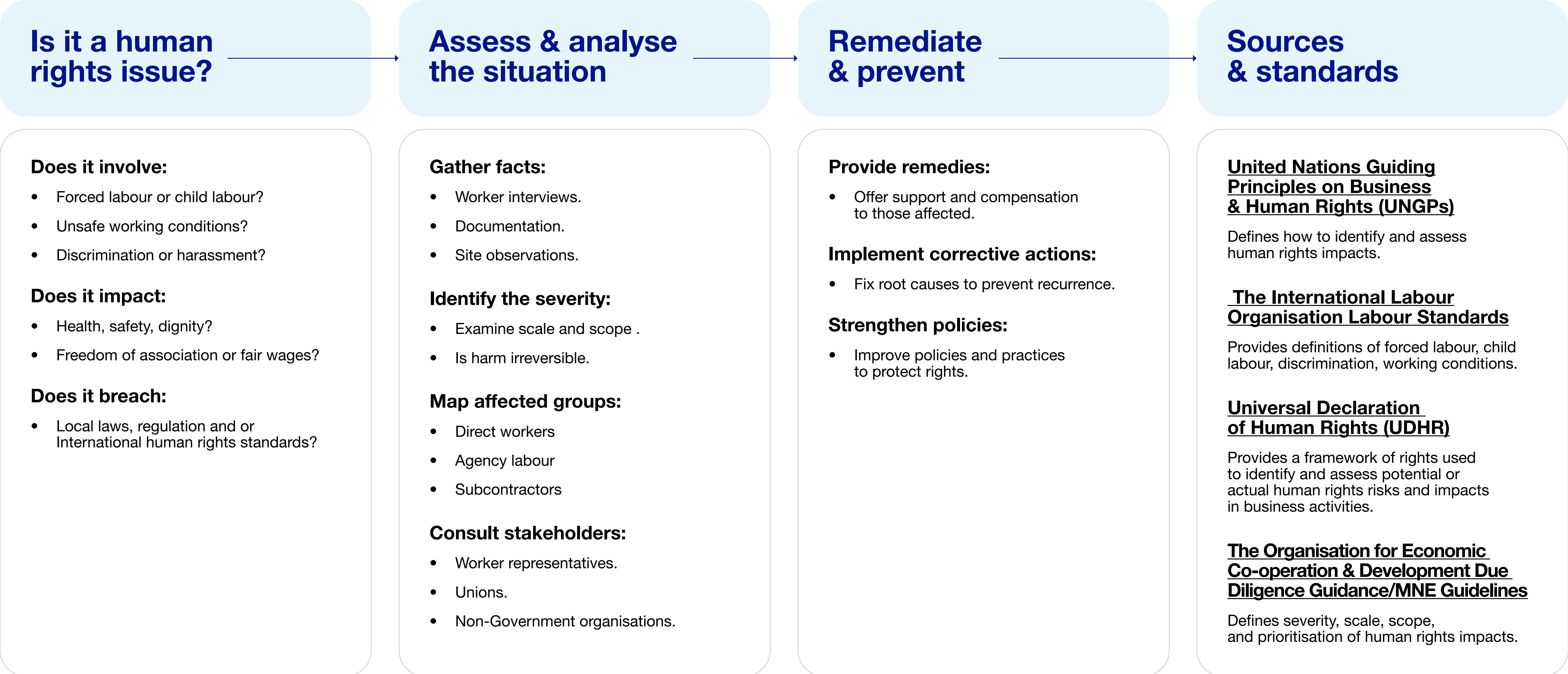
## Definitions

<b>Labour exploitation</b>	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.
<b>Human rights</b>	When the potential or actual negative impacts on human rights linked to a company’s operations, products, or services.
<b>Forced labour</b>	When someone is made to work against their will, often through threats, violence, or punishment.
<b>Human trafficking</b>	The movement or control of people through force, fraud or coercion, often for labour, sex work or other forms of exploitation.
<b>Debt bondage</b>	When someone is forced to work to repay a debt, often under unfair or impossible terms that trap them in exploitation.
<b>Child labour</b>	Work that is dangerous or harmful to children, or that interferes with their education and development.
<b>Exploitation</b>	Taking advantage of people through unfair, abusive or illegal work conditions, often for financial gain.
<b>Vulnerability</b>	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

<b>Appearance</b>	<ul style="list-style-type: none"> <li>• Signs of physical or psychological abuse.</li> <li>• Look malnourished or unkempt.</li> <li>• Appear withdrawn.</li> </ul>
<b>Possessions</b>	<ul style="list-style-type: none"> <li>• Have no travel documents/passports.</li> <li>• Few or no personal possessions.</li> <li>• Always wear the same clothes.</li> <li>• Clothes not suitable for their work.</li> </ul>
<b>Manner</b>	<ul style="list-style-type: none"> <li>• Reluctance to seek help.</li> <li>• Avoid eye contact.</li> <li>• Appear frightened or hesitant to talk.</li> </ul>
<b>Isolation</b>	<ul style="list-style-type: none"> <li>• Restricted freedom of movement.</li> <li>• Rarely allowed to travel alone.</li> <li>• Seem under control/influence of others.</li> </ul>
<b>Living conditions</b>	<ul style="list-style-type: none"> <li>• Living in dirty, cramped or overcrowded accommodation.</li> <li>• Living and working at the same address.</li> </ul>
<b>Time</b>	<ul style="list-style-type: none"> <li>• Unusual travel times.</li> <li>• Dropped off/collected for work on a regular basis, either very early or very late at night.</li> <li>• Work excessive hours.</li> </ul>

# Identification of exploitation framework

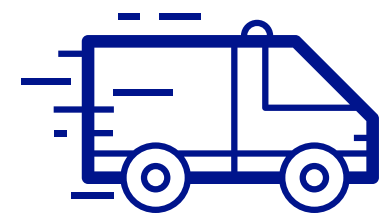


# Immediate actions in case of danger to individuals



## 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.

# Escalation process

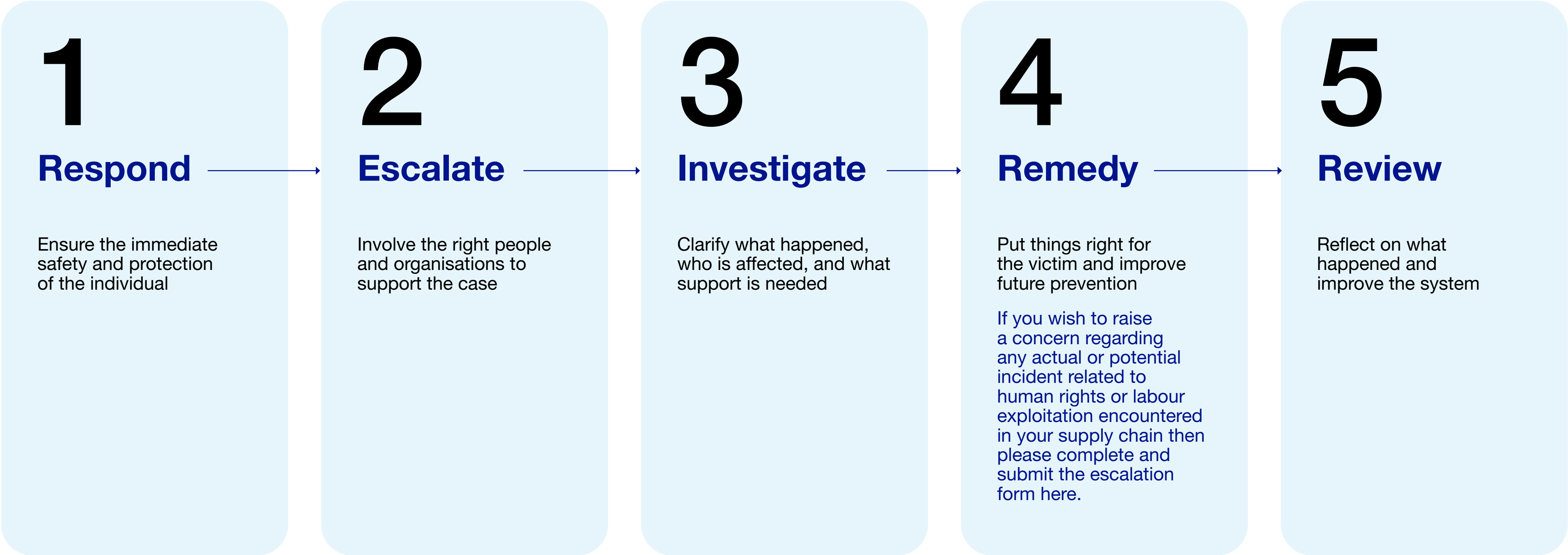
Responding to a potential case of a human rights issue can feel overwhelming, especially if you're unsure what to do or who to involve. This section sets out a clear, step-by-step process to help you act confidently and responsibly. The process is built around five stages: **Respond, Escalate, Investigate, Remedy, and Review**. At each stage, the toolkit outlines what you should do.

You'll find accompanying guidance in the checklist and appendices & contact information page to help apply this process in real-world situations.

When in doubt, reach out. The sooner concerns are raised, the sooner we can work together to protect those at risk.

Whether you're managing a live incident or reviewing your internal procedures, this framework can guide your actions. It is designed for use by businesses of all sizes, including those with limited internal resources or specialist knowledge.

This is not about acting alone. We recognise that suppliers may need help navigating complex or sensitive situations. Our approach is based on partnership, ensuring that no one is left to manage these challenges without support.

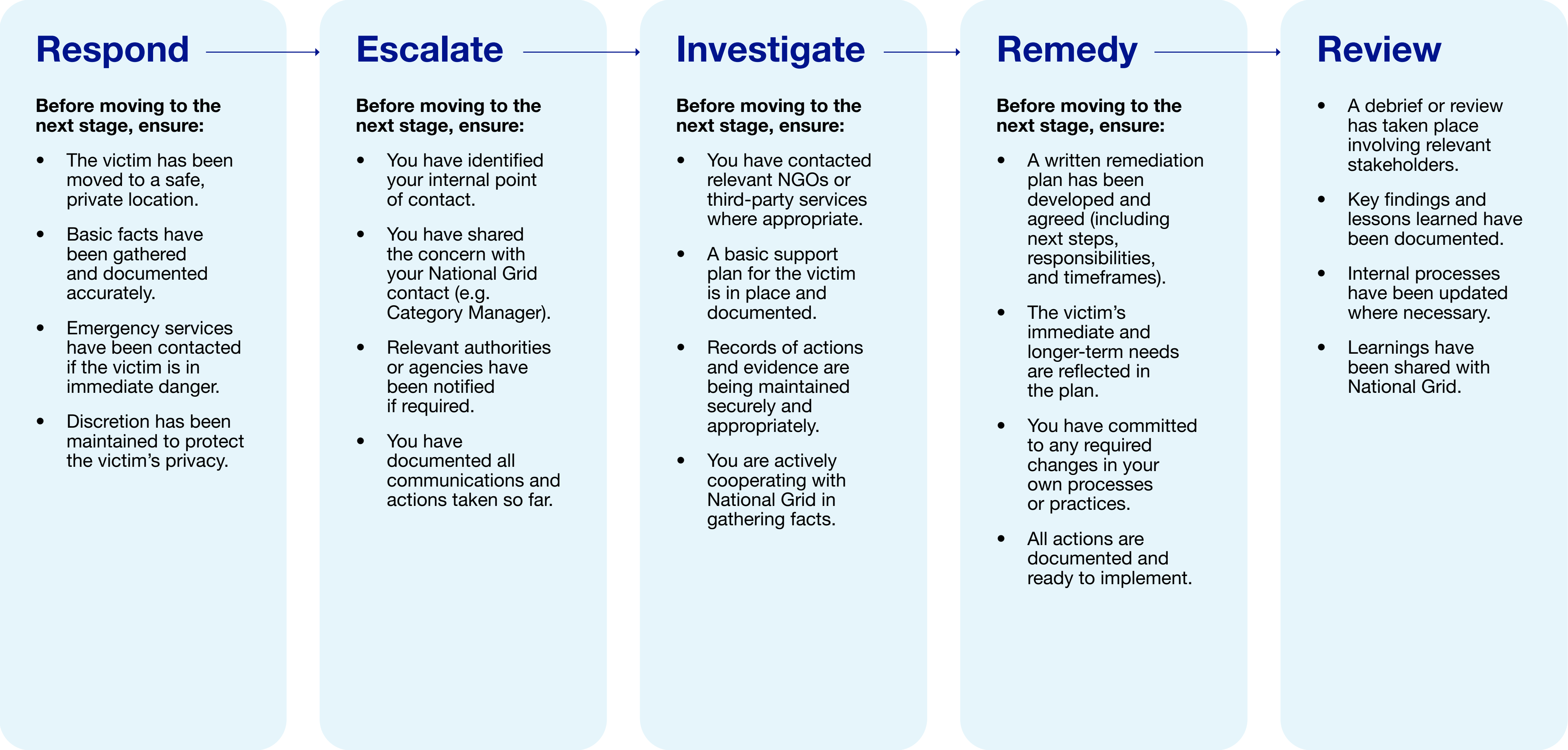


# Incident response checklist

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.**



# Appendices & contact information

Links to appendices can be found [here](#).  
Click the link to access the [Supplier Code of Conduct](#).

## Ethics contacts

### UK

External/Focus Helpline

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

### US

External/Alertline

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

## Slave Free Alliance

### UK

External/Focus Helpline

Phone: 0300 008 004  
[info@slavefreealliance.org](mailto:info@slavefreealliance.org)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

[nationalgrid.com](http://nationalgrid.com)