

Modern slavery

Our statement on slavery
and human trafficking 2021



Introduction

As CEO of National Grid, it is important to me that everyone working for National Grid or on our behalf can expect decent working conditions, work freely and receive fair pay in return. Modern slavery is a serious global issue and we recognise the important role we can play in helping to eradicate it. Respect for human rights is incorporated into our employment practices and our values.

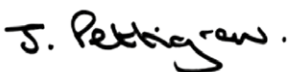
We have recently launched our Responsible Business Charter setting out our commitments and ambitions and how we will achieve them, focusing on areas where we can make the most impact in society.

We continue to keep customer and employee wellbeing and safety as a priority during the international pandemic. During these unprecedented times we understand more than ever the need to focus on people in our business, supply chains and our communities. We continue to monitor the heightened risks associated with COVID-19 and the impact that it can have on the supply and distribution of key items to maintain the safety and well-being of our employees and those working on our behalf. We are engaging with our suppliers to understand and address risks and provide support where needed, identifying any opportunities where we can act to minimise any heightened modern slavery risks that may occur. We have also partnered with charities both in the UK and US, offering our time and expertise and providing financial donations to those who are most vulnerable in our communities.

Our approach to delivering the commitments made in our 2020 statement has continued to be through engagement and collaboration with stakeholders and suppliers. We have incorporated elements of modern slavery controls into our responsible procurement plan and have now developed our modern slavery risk assessment tool into a broader sustainability assessment tool, which we implemented during 2020 and which also enables our suppliers to utilise this same approach through their own supply chains. We have been especially focused on industry areas which we know are potentially high risk, such as construction, where we are working with our supply chain partners to begin to understand what is happening right through the supply chain and how we can collaborate to drive improvements. We have also been helping our people to develop knowledge and understanding of modern slavery, so that we can spot the signs in our everyday lives and feel confident to take any action necessary.

Recognising this has been a challenging year for everyone, I'm proud of the progress we have made so far, but know we can never be complacent. In this statement, for the financial year ending 31 March 2021, we describe what we have been doing to prevent modern slavery and our plans for continuous improvement over the coming year, as required by the UK Modern Slavery Act 2015. The statement applies to National Grid plc and each of the specifically named subsidiaries (see last page of document). The boards of each of these subsidiaries have reviewed, approved and adopted this statement.

I have signed this statement on behalf of the Board of Directors of National Grid plc following its approval on 22 April 2021.



John Pettigrew
Chief Executive

Contact us about this statement [here](#)
See National Grid's statements for previous years [here](#)



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1. Our progress summarised

In our last statement, this is what we said we would do:

Develop and implement training on modern slavery for employees, focusing on awareness, spotting the signs and common risk areas in our everyday lives.

Develop a due diligence programme around our responsible procurement plan identifying areas of initial focus, for example, promoting awareness and assurance of payment of the real living wage in the UK in areas where low wages are a potential risk.

Utilise existing site visits to incorporate visual modern slavery checks focusing on construction sites where there is the potential for low skilled labour, for example, demolition work and ground clearance.

Establish a sustainability ambassador network in procurement to support delivery of our responsible procurement agenda through our category teams.

Identify and utilise scorecard metrics from the Supply Chain Sustainability School (SCSS) to monitor supplier engagement and capability on sustainability.

Develop action plans within our business to support the requirements of the People Matter Charter and promote this with our suppliers.

Share our recognised good practice and associated materials that relate to the well-being of employees, with our supply chains.

Continue the work that commenced to look at the Hinkley Point project in more detail, mapping the supply chain and understanding what modern slavery risks and controls are in place further down the supply chain. This important work will provide learning which we can transfer to other similar projects.

Track progress on actions plans developed from supplier engagement sessions.

This is what we have delivered this year, against the commitments we made:

We have developed a modern slavery awareness video that has been made available to all of our employees.

We are signatories to the People Matter Charter which we promote through our supply chain. This includes a Roadmap to evidence the action taken against the commitments including payment of the real living wage. We have also engaged directly with suppliers to understand how they ensure the real living wage is being applied in line with our contract terms.

We have started to identify key areas where we can incorporate visual checks when site visits commence and will continue to explore further options where we can use this approach.

Sustainability ambassadors have been established in the UK and US with monthly meetings and a focus on ensuring delivery of the agenda through the procurement category teams.

In the UK we promote the use of these resources with our supply chain and have updated our list of priority suppliers. We plan to use the new learning pathways tool to track completion of key training modules.

As a signatory to the People Matter Charter we have a Roadmap in place to focus on this area of improvement. We have started this by supporting engagement sessions delivered by the School delivering a business session on the real living wage.

We have shared our health and wellbeing strategy with suppliers via the SCSS.

One of the key contractors for this site has provided a supply chain map for construction of the haul road, indicating the organisations involved from raw materials through to construction, this model can be adapted for other large projects to support the identification of any potential risks in the supply chain.

We undertook a review of existing action plans to follow up on any outstanding commitments. The sustainability requirements are now embedded into the procurement process and will be built into vendor management incorporating any outstanding elements.

2. Our business and supply chains

An introduction to our business and our values

National Grid is an international electricity and gas company at the heart of one of the greatest challenges facing our society – delivering clean energy to support our world long into the future. Based in the United Kingdom (UK) and the United States (US), we play a vital role in connecting millions of people safely, reliably and efficiently to the energy they use. Our company headquarters are in London. For the year ending 31 March 2021, our annual group turnover was £14.7 billion.



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 clean, fair and affordable energy future.

Our values

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

Our business (UK)



Electricity

We own the high voltage network in England and Wales and are responsible for transporting electricity from where it is produced and for facilitating the connection of assets to the transmission system.

In 2019 a separate subsidiary of the National Grid group was established, the Electricity System Operator, which is responsible for ensuring supply and demand is balanced across the UK transmission system.

Facts and figures

2,806 km of underground cable
7,236 km of overhead line
350 transmission substations.

Gas

We own and operate the high-pressure gas transmission network in Great Britain and are responsible for making sure gas is transported from where it is produced.

As the Gas System Operator, we are responsible for ensuring that supply and demand are balanced on a day to day basis in real time.

Facts and figures

7,630 km of high-pressure gas pipe.

Our business (US)



Electricity

We own and operate transmission facilities across upstate New York, Massachusetts, New Hampshire, Rhode Island and Vermont. We own and operate electricity distribution networks in upstate New York, Massachusetts and Rhode Island.

Facts and figures

397 transmission substations
728 distribution substations
14,439 km of overhead line.

Gas

We own and operate gas distribution networks across the north-eastern US and are responsible for connecting customers to the energy they use.

Facts and figures

57,551 km of gas pipelines.

National Grid Ventures



National Grid Ventures and other partners

National Grid ventures manages our portfolio of businesses that operate globally alongside our core regulated operations.

The business comprises commercial operations in energy metering, electricity interconnectors, renewables development and the storage of liquified natural gas (LNG) in the UK.

In 2019, we completed the acquisition of Geronimo Energy, a leading wind and solar developer in North America, now known as National Grid Renewables.

Facts and figures

4 interconnectors operating
2 interconnectors in development
7.8GW interconnector capacity
8.4m gas meters
1,000,000 m³ LNG tank space.

Our people

Our people

We recognise the value of our people. We employ a diverse workforce consisting of over 23,500 people globally, mainly in the UK and the US and operate policies and procedures (see page 8) to ensure the highest standards of ethical conduct. Equality and fairness are very important to us. As a responsible business we pride ourselves on treating all employees fairly, ensuring that they are provided with a respectful, safe and secure environment.

Our recruitment programme is designed to ensure equal opportunities, compliance with local legislation and that all our people have the appropriate rights to work. We use employment agency partners for attracting temporary workers and they are contracted to uphold the same standards of employment that we offer our direct employees.

Contract Managers actively manage our employment agency partners, to monitor that they are meeting our employment requirements, including carrying out any relevant screening, paying the Real Living Wage and adopting the “employer pays” principle. This means that no employee of National Grid should ever have to pay to obtain access to temporary or permanent work within our organisation or supply chain.

We carefully monitor this area and believe that the policies and processes we have in place mean that the risk of forced or trafficked labour being employed directly by National Grid and its employment agencies is very low.



In the UK, we are committed to paying our employees, trainees and contractors working on our behalf, at least the Real Living Wage, as set by the Living Wage Foundation.

In the US, we pay all our employees at least the minimum wage.



Our employees are at the heart of what we do which is why we're proud to be one of 141 companies who participated in the 2020 Workforce Disclosure Initiative. This initiative is encouraging transparency from companies on how they manage workers with the goal of improving the quality of jobs in company operations and supply chains. This year we improved our Scorecard rating significantly up to 82% overall, from 38% last year, and the supply chain elements were very strong.

Diversity

All our employees and their families are supported by internal health and wellbeing programmes and have access to an employee assistance helpline, which is a confidential service that provides support across a range of areas including emotional support, debt and legal advice. Employees can also join trade unions and in the UK we have engaged with them through HR to ensure that modern slavery awareness is part of their agenda.

23,547

employees across the UK and US.

44

years is the average age of our employees.

72%

of our workforce is based in the US.

19.5%

of our workforce are from 'minority' racial or ethnic heritage.

28%

of our workforce is based in the UK.

83%

of employees would recommend National Grid as a good place to work.

25%

of our workforce are female.



We work hard to promote diversity with programmes in place to ensure we are attracting talent from young and ethnically diverse groups. We have recently appointed a Chief Diversity Officer to work with our senior executive and Human Resources to build and deliver on our Inclusion and Diversity Strategy.

Our supply chains

We work with around **6,000** suppliers across our global organisation and spend over **£5.5bn** with them. Our [Spend Profile](#) details the top 10 countries where our suppliers are located.

We spend 39 per cent of our total annual budget with these [25 organisations](#).

The standards we expect, relating to working conditions, pay and workers' rights for those working in our supply chain, are mandated into our contracts through our supplier code of conduct (**see page 8**).

During these unprecedented times of the global pandemic, we are adhering to government guidelines in relation to how we carry out our work and manage our projects and those suppliers who are working alongside us. Additionally, we have sent an [open letter](#) to all of our suppliers, providing links to our COVID-19 response and contact information should they have any issues or concerns.



At least **99%** of what we spend with our direct suppliers is in countries ranked as low risk by The Global Slavery Index.

3. Our policies

We know that setting clear expectations is very important. Summarised below are our policies, which collectively set the standards we require, encompassing the prevention of modern slavery in the workplace and in our supply chains. Our policies are supported by an internal business management system, that outlines what we do and how we should do it, ensuring that we live up to our values. We regularly monitor compliance with our policies and report on how we're doing to our executive and audit committees.



Policy	Scope	Relevance to modern slavery
<u>Code of Ethics</u>	This is our company code of conduct that is applicable to employees and sets out our values and how we expect employees to behave whilst working for National Grid.	It includes sections on discrimination, harassment, bullying and human rights and sets out National Grid's commitment to zero tolerance to all forms of corruption as well as the avenues available for raising concerns and how we will protect those who "speak up" about a concern.
<u>Supplier Code of Conduct</u>	This is reviewed, updated and sent to all our suppliers on an annual basis and sets out the standards we expect our suppliers to work to and which they should extend into their own supply chain, whilst working for National Grid.	It includes reference to the key international labour standards and the ethical trade initiative base code and real living wage requirement. We encourage all suppliers to publish a modern slavery statement regardless of legal obligation.
Recruitment (internal)	Our internal recruitment policies ensure that employees have equal opportunities, the relevant rights to work and are employed in line with all local legislative requirements.	The recruitment checks in place safeguard human rights, minimising the risk of directly recruiting someone who is being forced to work or is being trafficked.
Inclusion and diversity (Internal)	This policy sets out National Grid's commitment to providing an inclusive, equal and fair working environment for all.	Recognises and respects the importance of an inclusive and diverse workforce.
Global Supplier Diversity Policy	This policy sets out National Grid's commitment to providing equal opportunities to suppliers and the promotion of an inclusive, fair and decent working environment for those that work for us in our supply chain.	Recognises and respects the importance of an inclusive and diverse supply chain workforce.
Disciplinary (internal)	This policy sets out what actions will be taken where employees deliberately break the requirements set out in the Code of Ethics.	All employees know what is expected of them and the consequences for misconduct.
<u>Anti-Financial Crimes Policy</u>	This policy sets out our commitment to prevent financial crime and corruption. It applies to all employees and those who work on our behalf.	References modern slavery and sets out the duty of all employees to be vigilant in guarding against and reporting unusual activity or payments.

Our policies in action

Responsible Business Charter

In October 2020 we launched our Responsible Business Charter which articulates what 'responsibility' means to National Grid. We have identified five areas where we can make the most impact on society: The environment, the communities we serve, our people, our economy and our governance. For each area we have set out our commitments and ambitions and how we will achieve them.

Grid 4 Good (G4G)

G4G is one example of our responsible business initiatives. Through G4G, National Grid, in the UK and US, is working closely with the energy industry to identify what roles are needed to help address the challenges of tackling climate change and achieving the net zero target. G4G will help to fill these roles by accessing untapped talent, targeting disconnected young adults from deprived backgrounds. People will be given access to training and careers they thought may never have been possible.

COVID-19 Pandemic – National Grid's response to helping the vulnerable in our communities

At a time when the world is facing its gravest challenge in generations, with seismic effects on society and the global economy, it is more important than ever that National Grid plays its part as a purpose-led, responsible business. During the ongoing periods of lockdown, we have focused on the immediate needs of people in our communities and we continue to give our time, expertise and resources to help the COVID-19 response in many different ways.

In the US, we have stopped debt collections and disconnections. We have also supported US small businesses by redirecting our contact centre resources to help them understand what federal aid is available to them. We increased outreach via emails, letters, calls and social media posts and videos for our Home Energy Assistance Program (HEAP) that helps low-income homeowners and renters pay for utility and heating bills. Furthermore, we have helped to power field hospitals on both sides of the Atlantic, we have made and donated Personal Protective Equipment to health care professionals, and we have refurbished 1,000 laptops to help with home schooling and skills training in the UK.

Alongside all of these actions, we have donated more than \$1,250,000 to community organisations across Massachusetts, Rhode Island and New York State to help those most affected by COVID-19. This has included support for first responders, provision of meals for children and families in need and funding for food pantries. In the UK, we have donated £400,000 to the National Emergencies Trust, which supports victims of domestic disaster, £100,000 to the Trussell Trust, Britain's biggest foodbank network, and £100,000 to the University Hospitals Birmingham Trust.

We have also match-funded our colleagues' own fundraising efforts throughout the pandemic. In the UK, we are enabling employees to support communities by giving them up to 4 hours a week of volunteering time.



An example of how G4G has helped in the fight against exploitation

One of our colleagues came to the UK in 2015 as a refugee. Not knowing anybody in the UK or having any family to turn to, she was put in contact with people from her native country who offered to help. Unfortunately, she was exploited financially and emotionally by these people whom she had put her trust in, resulting in her finding shelter in a YMCA hostel. Whilst living at the hostel she saw a G4G leaflet offering workshops to support people getting into paid work and education. She attended these workshops and was given the opportunity to share details of her background and skill set which was relevant to the gas industry.

The National Grid employees that were facilitating the workshops put her in contact with the relevant business area in National Grid who recruited her into an existing role that was vacant at the time. This opportunity has allowed our colleague to thrive as an individual and become self-sufficient once again whilst also enabling the industry to benefit from her skillset. These circumstances could have been very different had she not felt able to move away from those that exploited her or found an opportunity through G4G.

665 young people have signed up to Grid 4 Good via our Charity partners providing them with access to support, training and careers that may never have felt possible.

4. Due diligence

We continue to collaborate across the industry and work with our suppliers to improve approaches to mitigate risks of exploitation.

We pre-qualify most of our UK procurement activities using a vendor registration system operated by Achilles called the Utilities Vendor Database (UVDB). During 2020 we worked with the Utilities Sector Modern Slavery Working Group, to propose improvements to the Achilles UVDB questions asked in relation to modern slavery, so that they go beyond basic compliance. These questions will be considered as part of the Achilles UVDB consultation process that is taking place during 2021, to review what questions are included in future pre-qualification assessments.

We continually review external media and use the Dow Jones for supplier sanction and adverse media screening service to check for adverse media, reports, fines or sanctions against our direct suppliers and have a process in place to act on anything that is highlighted, in a timely and appropriate way. For example, we were made aware of legal action being taken by modern slavery victims against one of our suppliers as a result of Operation Fort. The allegations came from individuals, who spoke little to no English, had travelled from Poland to the UK and were promised a decent wage and secure work in the West Midlands. Instead they were forced into squalid, overcrowded houses, and payments were controlled by the criminal gang convicted under Project Fort. The company involved worked closely with West Midlands police at the time of the incident in 2016. The incident does not affect the National Grid business directly however we have worked closely with the supplier involved and we have evidence that they have made significant efforts to address the issues raised working with Slave Free Alliance over the past 5 years.

As a result of the Covid-19 situation there was an unprecedented increase in demand for PPE which put pressure on suppliers and manufacturers. We recognised the increased risk, not only from a quality perspective but the potential impact on workers producing the key items. Most of these items are being sourced from existing suppliers all of which are under contract and as a result are subject to review and audit related to the modern slavery provisions.

We recognise the importance of having responsible and sustainable procurement processes in place and as part of our RIIO 2 regulatory plans for 2021–26, we have included our [responsible procurement action plan](#), which has been agreed by Ofgem. We are developing a Responsible Procurement Strategy, building upon the work we have already done, to align more closely with our Responsible Business Charter. This will be in place in FY21/22.

Whilst we recognise that the legislative landscape may change as a result of Brexit we are committed to maintaining the same level of due diligence in all of our procurement practices.

We have introduced a background checking requirement for our contractors and are embedding this into our procurement processes.

Collaborating to improve industry standards

We know we don't have all the answers. We strongly believe that sharing best practice and learning from peers and subject matter experts is not only efficient but also essential, if we are to drive up standards right across the industry. We regularly engage with best in class organisations including BT, Network Rail, SSE, United Utilities, PGE, Sellafield, Balfour Beatty, Murphy Group, Mace, Costain, Siemens, Transpower and Electricity North West to discuss key areas for action.

We have supported the Home Office research and usability testing for the planned modern slavery statement registry service which was a key recommendation from the Independent Review of the Modern Slavery Act.

We have used the Ethical Trade Initiative (ETI) modern slavery statements evaluation framework to review the structure and content of our Statement and identify strengths and weaknesses to work on over the coming years.

We are members of a number of working groups that are designed to drive change on a broader scale and continue to engage across the industry on best practice approaches for addressing the risk of modern slavery.

Here are some highlights:

United Nations Global Compact Modern Slavery Working Group –

We are sharing knowledge and best practice approaches to addressing the risks of modern slavery.

Gangmasters Labour Abuse Authority – Construction Protocol

We are continuing to promote the construction protocol within our supply chains and use of their tools and materials.

Supply Chain Sustainability School (SCSS)

We are collaborating with industry partners and are promoting the use of the SCSS resources and tools including those focused on modern slavery.

We have been actively involved in the SCSS labour working group that has resulted in a People Matter Charter which we are signatories of, alongside many of our main contractors.

Chartered Institute of Purchasing and Supply

We are promoting chartered status within our procurement community which requires completion of the annual ethical responsible procurement training.

Slave Free Alliance

We have been actively involved in establishing a Utilities Sector Modern Slavery Working Group focused on

- Raising awareness to prevent the exploitation of workers and the community.
- Sharing best practice amongst the group's members.
- Collaborating to produce a co-ordinated response to reducing risks in supply chains.

5. Risk assessment

Risk assessment and management

We have embedded our sustainability risk assessment tool to consider potential risks at the initial stages of sourcing activity.

In 2017 we carried out a risk assessment of our top 250 suppliers (based on spend) and we used this to do more detailed risk assessments and action planning with those companies who were potentially high risk. We have shared the approach that we took to do this with our supplier community on our supplier webpage providing transparency and also an opportunity for them to utilise the tool further down their own supply chains.

Since the initial modern slavery risk assessment, which was conducted at a point in time, we have developed a sustainability assessment tool using the risk assessment criteria developed, to embed human rights considerations around decent working practices into our strategic sourcing process alongside other sustainability criteria. In the UK, the tool maps to the relevant Achilles Utilities Vendor Database (UVDB) questions and requires a positive response against the key questions identified. The majority of the questions are mandatory at the pre-qualification stage of our sourcing process. In the US, questions are integrated into the sourcing process and evaluated in the contract award.

This approach is referenced in our strategic sourcing process training and has been integrated into sourcing events.

In our UK RIIO-2 Framework contracts (these are the contracts which will take us through our next regulatory price control period) questions on human rights risk assessment were integrated into the sourcing process and any potential risks identified will be reviewed and managed through the contract management processes as part of a range of health checks.

In the instance where a supplier is either unwilling or unable to provide the relevant evidence, this could result in a formal process to review the contract and influence the allocation of any future project work over the framework period.

To better understand any potential risk, we have been working closely with our Tier 1 contractors on one of our main infrastructure construction projects – Hinkley Point – to map out the supply chains involved and identify where the risks may arise. An example of the supply chain mapping undertaken and engagement that is taking place is shown on the right.

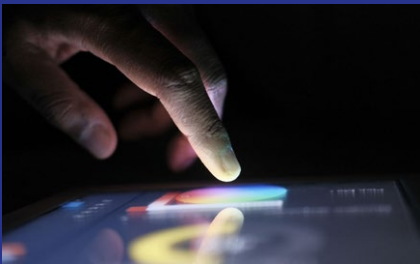


In January 2019, we announced that 3 construction contracts worth £300m had been awarded as part of the Hinkley Point C Nuclear Power Station project. The contracts were awarded to J. Murphy & Sons Ltd (to build underground cables), Balfour Beatty (to build T Pylons) and Siemens to build the new substation).

Our initial engagement has been with Murphy & Sons Ltd. to map their supply chains associated with establishing the haul roads for the site. They have shared with us the assessment process they went through to select the Tier 2 level suppliers. For the road infrastructure they have provided a supply chain map detailing the organisations involved from sourcing the raw materials through to production and then on to construction of the road. This includes the quarries which will be used and reference to the supply chain management processes that are in place.

This is a big project that is to complete in 2025 and we will continue to map and track the supply chain back to the source materials so that we can fully understand the potential risks on our large-scale projects where there are likely to be numerous tiers in the supply chain.

We will be monitoring this project closely and as our knowledge about modern slavery or exploitation risks develop, we will address them during this project and transfer learning and mitigations to other similar projects.



We provide all our suppliers with access to the assessment tools we have developed for identifying and combatting exploitation in supply chains. These are made available on our supplier webpage.

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 continually promote openness and transparency and provide avenues available to all employees and those working on our behalf to raise concerns. We have confidential helplines available globally, operating 24/7. Details of these [helplines](#) are available on our website, in our Code of Ethics and Supplier Code of Conduct and on posters that are displayed in our offices and at our construction sites.

We take all allegations of any type of unethical or illegal behaviour very seriously and we have dedicated ethics and business conduct teams who are trained to deal with all reported concerns sensitively and thoroughly. We carry out independent investigations and take any relevant action. Any findings from our investigations are reviewed at our regional ethics and compliance committees, which are made up of senior leaders from within our organisation, whose role is to oversee the ethical standards of the company and monitor the effectiveness of our speak up programmes. Each year we track metrics through our employee engagement survey.

We also provide summaries of metrics, allegations and findings to our group executive and audit committees together with regular updates on our ethical programmes, including modern slavery.



We encourage anyone to raise concerns through our helplines which operate 24/7 by phone or email.

Through our recent employee engagement survey, we know that **76%** of our workforce believe they can safely raise an ethical or compliance concern using our helplines.



Raising awareness

We provide a programme of training to all our employees

Training and awareness

Our induction programme provides training and awareness of our company values and our Code of ethical business to all new starters. In addition, we have ongoing mandatory training for all employees on topics related to our Code. The key elements of our Code are incorporated into our supplier code of conduct including our approach to combating modern slavery.

During 2019 we assessed the training needs associated with managing supplier engagement around sustainable procurement and decent working practices. This is going to be refreshed as part of the Responsible Procurement Strategy and training will be a key element of the strategy. Our global procurement professionals will receive updated training on Supply Chain Sustainability including human rights and decent work in the supply chain, modern slavery awareness, embedding our sustainability assessment tool and understanding the process for raising concerns.

We have also raised awareness of our supplier code of conduct within our contract management community and, as a key stakeholder, will be providing additional training to help them understand the processes that are in place and how to frame conversations with their suppliers around the human rights agenda, including modern slavery. This is already included in the RIIO-2 contracts as part of ongoing contract management.

We are encouraging our suppliers to utilise the free training and resources that are available through the SCSS and we will be tracking this via the supplier dashboard. We will be looking into how we use the learning pathways in the school to promote key training modules and how this could be done at an industry level with other partners of the School.

We promote relevant initiatives within our supply chain including the People Matter Charter and the Construction Protocol, which we believe will drive industry changes as more organisations sign up to these initiatives.



A modern slavery awareness video has been developed and communicated to all employees, this details the signs to look out for both in and out of work and also who to contact if you have a concern that somebody may be a victim of modern slavery. As a responsible business we can help inform our people and our supply chains so that we all have the knowledge and confidence to recognise and report any related concerns that we may witness in our everyday lives.

7. Measuring our effectiveness

We continually review the measures we have in place to check our progress and ensure our programmes are effective. We use this information to build our future plans.

Measure	Reason for measure	2017–2018	2018–2019	2019–2020	2020–2021
Number of potential human rights issues identified through our supplier screening process.	We continually monitor adverse media reports in our supplier population and screening tools are in place to detect these. This provides a route for identifying any concerning issue including those relating to modern slavery enabling actions and controls to be put in place.	0	0	1	1*
Number of modern slavery issues reported through our confidential helplines.	Details of our confidential helplines are made available to our employees, suppliers and the general public providing an avenue for reporting any ethical related concerns. We monitor all reports continually and use the information to identify potential control weaknesses and improve our processes going forward.	0	0	0	0
Number of non-supplier organisations we have engaged with.	We continue to engage with NGO's, peers and subject matter experts to review our approach and share best practice.	–	15	31	30
Number of our suppliers that have signed up to the initiatives that we are supporting and promoting.	Number of our Tier 1 supplies who have signed up to:				
	Construction protocol	–	–	12	14
	People Matter Charter	–	–	5	8

*See page 10 for details of the media report indicated here.

8. Focus areas for 2021

We are fully committed to work on the following activities during 2021. We will continually monitor risks and the working environment in respect of COVID-19 and recognise that this may alter what we focus on and how we deliver the commitments below.

- To extend the supply chain deep dive approach to other major projects and to directly supplied goods that fall into the high-risk category, for example, personal protective equipment.
- Embed the process for the background checking of suppliers.
- Refresh our supplier modern slavery risk assessment tool to align with SCSS guidance and recommendations from the utilities sector modern slavery working group, facilitated by Slave Free Alliance.
- Development of a Responsible Procurement Strategy to align with the Responsible Business Charter, formalising the reporting and strengthening the governance and ownership of the Statement.
- Continue to look for opportunities to utilise existing site visits to incorporate visual modern slavery checks focusing on construction sites where there is the potential for low skilled labour, for example, demolition work and ground clearance.
- Review the [Operation Fort report](#) produced by the Independent Anti-Slavery Commissioner, consider the learnings and any action points and share these through our supply chain.



Governance

Our Regional Ethics and Compliance Committees assess our approach to modern slavery and oversee progress. Our Group Executive Committee and the Board receive reports on how we are doing and guide our future focus, to review and enhance the actions we are taking to improve our approach and that of our suppliers.

To find out more, or to give us feedback on our statement, contact us [here](#).



The statement applies to National Grid plc and the following subsidiaries. The Boards of each of these subsidiaries have reviewed this statement and have approved it.

UK

National Grid Holding One Plc
Lattice Group Ltd
National Grid Holdings Ltd
National Grid Gas Plc
National Grid Metering Ltd
National Grid Grain LNG Ltd
National Grid Gas Holdings Ltd
National Grid Electricity Transmission Plc
National Grid Electricity System Operator Ltd
National Grid Interconnectors Ltd

US

National Grid USA
Boston Gas
The Brooklyn Union Gas Company
Keyspan Gas East Corporation
Massachusetts Electric Company
Nantucket Electric Company
Transgas Inc
Niagra Mohawk Power Corporation
National Grid Generation LLC
New England Power Company
National Grid LNG LLC
The Narragansett Electric Company
National Grid Port Jefferson Energy Centre
National Grid Glenwood Energy Centre
New England Electric-Transmission Corporation
New England Hydro-Transmission Corporation
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