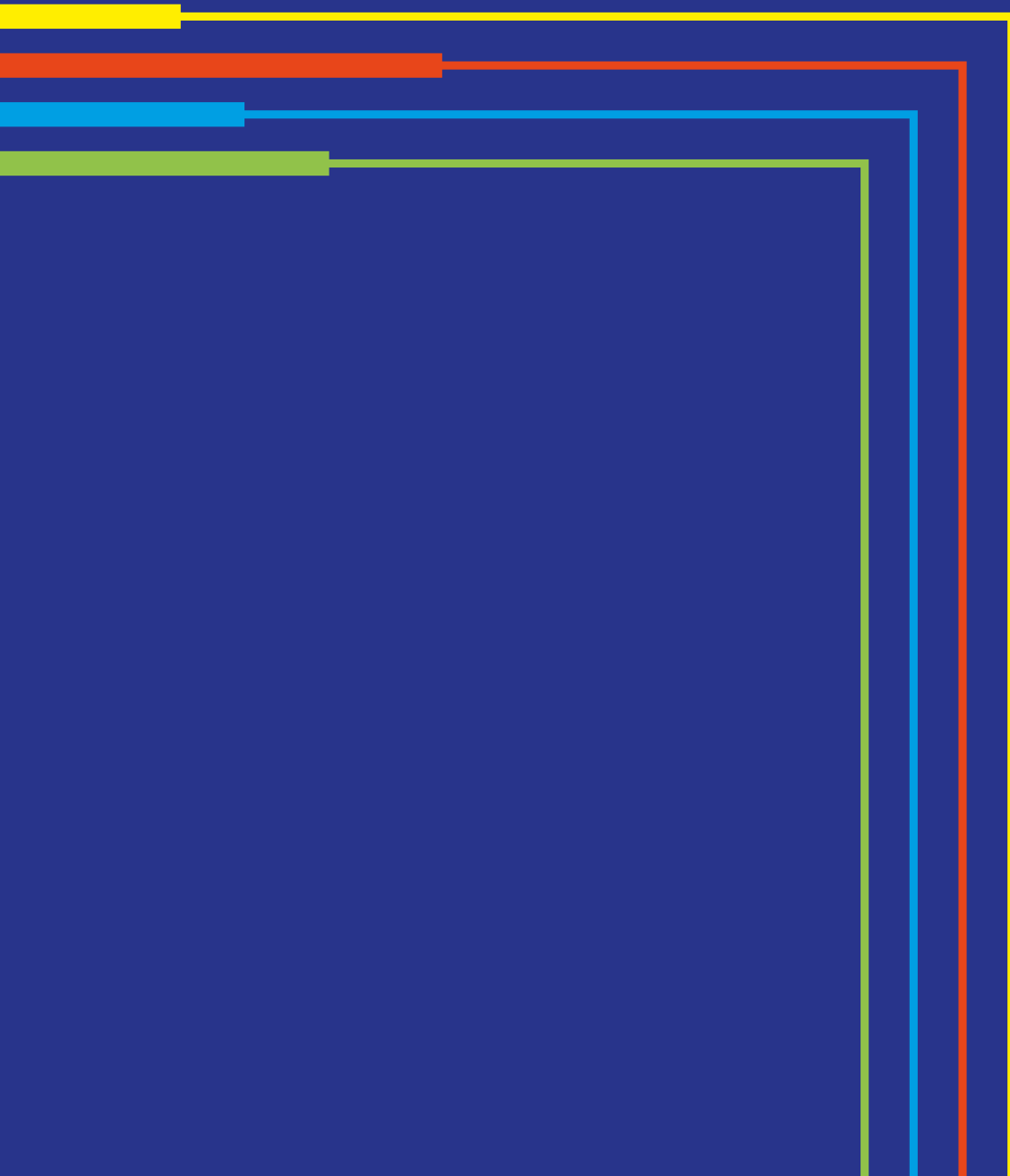


# Our policy on Human Rights

Version 2



# Policy statement

National Grid’s Human Rights Policy affirms our commitment to respecting and upholding the fundamental rights and dignity of every individual affected by our operations. Grounded in internationally recognised standards, including the United Nations Guiding Principles on Business and Human Rights, this Policy establishes the principles and expectations that guide our conduct across all regions in which we operate.

We recognise that businesses have a responsibility not only to comply with applicable laws and regulations, but also to act as stewards of human rights within their spheres of influence. This responsibility extends across our operations, supply chains, and business relationships. We are committed to identifying, preventing, mitigating, and remediating adverse human rights impacts that may arise in connection with our activities.

The principles articulated in this Policy are central to National Grid’s core value of “doing the right thing.” We are committed to fostering a culture of accountability, transparency, and continuous improvement in our human rights practices, and we encourage all stakeholders to report concerns regarding potential human rights violations through the channels identified in this Policy without fear of retaliation.



**Zoe Yujnovich**

Chief Executive Officer,  
National Grid

**Principle**

National Grid plc is committed to complying with applicable human rights laws and respecting internationally recognised human rights standards, including the International Bill of Rights, the International Labour Organisation’s Declaration on the Fundamental Principles and Rights at Work, the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the United Nations Sustainable Development Goals. Our Human Rights Policy and its supporting materials outline our commitment to human rights.

**United Nations Sustainable Development Goals supported by this Policy**



**Scope, Governance and Oversight**

This Policy applies to all subsidiaries and joint ventures controlled by National Grid plc (hereafter “National Grid “or “Company”) and to all National Grid directors, officers, and employees, including individuals employed at domestic and foreign subsidiaries and joint ventures controlled by the Company (collectively “Company Personnel”), and, where necessary and appropriate, to our upstream and downstream supply chain, through partners, suppliers, and third-party contractors.

The National Grid Plc Board of Directors is responsible for providing governance and oversight of National Grid’s compliance programmes, including compliance with laws and regulations addressing human rights. The Chief Compliance Officer owns the Policy and, together with the Chief People Officer, Chief Procurement Officer and our Business Unit Presidents, is responsible for helping to ensure compliance with this Policy.

The Chief People Officer is responsible for ensuring that practices to recruit, hire and retain Company Personnel comply with the Policy.

The Chief Procurement Officer is responsible for taking reasonable steps to ensure that human rights risks are appropriately identified and addressed within the supply chain, and for setting expectations with the Company’s suppliers regarding the importance of human rights.

## Commitments

In the table below, we outline our commitments to human rights, along with the safeguards we have in place.

We are committed to	Safeguards
<b>Complying with minimum age requirements and not hiring individuals who are under age.</b>	We have pre-employment screening checks in place, and these checks enable us to verify the age of prospective employees to ensure that we do not recruit anyone who is under the legal working age.
<b>Eradicating all forms of forced labour and slavery and working with our supply chain to do the same.</b>	<p>Our internal recruitment policies ensure that employees have equal opportunities and are employed in compliance with local legislative requirements. Pre-employment screening checks are completed by our independent background checking service provider, ensuring that potential employees, at a minimum, have had their identity verified and their right to work confirmed in the relevant country.</p> <p>We also require our third-party suppliers to confirm that they have completed the background checks for any of their employees who are contracted to work on National Grid sites.</p> <p>These checks help safeguard human rights, minimising the risk of directly recruiting someone who is being forced to work or who is being trafficked. We produce an annual Modern Slavery Statement, which sets out the steps taken to monitor and manage any potential human rights risks in our supply chain.</p>
<b>Providing a healthy, safe, and secure workplace for all employees and contractors.</b>	<p>National Grid has health and safety policies that apply to all National Grid employees and colleagues who work on our behalf.</p> <p>To help protect our people, assets, and the communities we serve, we apply and monitor risk and control measures in our activities across our businesses.</p>
<b>Providing an inclusive working environment where everyone is treated with respect and dignity.</b>	<p>We have policies in place that set out National Grid's commitment to providing an inclusive working environment and equal opportunities for all.</p> <p>We have 16 Employee Resource Groups (ERGs), which are open to all and provide a support network for everyone who works at National Grid.</p>
<b>Providing competitive compensation and good conditions of employment.</b>	<p>We provide competitive salaries and good conditions of employment for our people. We meet or exceed statutory minimum wage requirements in all jurisdictions where our employees are based in the UK and the US.</p> <p>Through our reward scheme, employees also have access to a wide range of additional benefits, including flexible working arrangements, savings options, childcare support, wellbeing resources, and financial guidance.</p>

We are committed to	Safeguards
<p><b>Respecting the rights of employees to join an independent trade union, engage in collective bargaining, and exercise freedom of expression.</b></p>	<p>We have collective bargaining agreements with trade unions in the UK. We also have an employee relations framework at a national and local level that we use to facilitate collective discussions with trade unions. None of our colleagues are denied the right to exercise freedom of association or collective bargaining.</p> <p>In the US, we have collective bargaining agreements with unions, which set out terms and conditions of employment for represented employees.</p> <p>We are proud to operate in countries where the rights of freedom of expression and information are respected by law.</p>
<p><b>Ensuring that our supply chain partners adhere to our global Supplier Code of Conduct and take steps to respect human rights.</b></p>	<p>National Grid requires all businesses in our supply chain to share a commitment to respecting, protecting, and promoting human rights. This includes alignment with the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Ten Principles, the International Labour Organisation and the Victims of Trafficking and Violence Protection Act of 2000 (US).</p> <p>Suppliers are expected to comply with our Supplier Code of Conduct, which, amongst other things, sets out our commitment to human rights.</p> <p>We expect our suppliers to protect the rights of indigenous peoples, refugees, and migrants, in line with relevant human rights policies defined in our statement.</p> <p>We participate in consultations and work with non-government organisations such as Slave Free Alliance, Action Sustainability and the Supply Chain Sustainability School to continually review and improve our approach to minimising human rights risks in our supply chains.</p>
<p><b>Respecting the human rights of our customers and individuals in the communities we serve.</b></p>	<p>National Grid's Responsible Business Charter outlines our commitments to our customers and the communities we serve.</p>

## Supporting Documents

The following documents are available on our corporate website and internal intranet sites and provide further information on how National Grid safeguards the human rights of its employees and people within its supply chain.

### [Responsible Business Charter](#)

### [Code of Ethics](#)

### [Supplier Code of Conduct](#)

### [Modern Slavery Statement](#)

# Due Diligence and Risk Management

## Assessment and tracking of human rights risks

National Grid has assessed and identified the salient human rights risks in our business, and these have been included in our Policy commitments. As a business, we will continue to assess the human rights risks of our direct workforce and those in our supply chain. We actively engage with various external bodies to ensure we assess and address human rights risks in line with good practice.

We monitor human rights risks across our business and supply chain using external screening services. Further controls are applied throughout the supplier lifecycle including due diligence during onboarding, risk management activities within the sourcing process, and targeted risk assessments conducted using our risk tools. Together, these measures help us identify, mitigate, and manage risk within our third-party supplier portfolio.

## Continual assessment

We continually review the measures we have in place to monitor our progress and ensure the effectiveness of our programme, using these insights to shape our approach. One such measure is the number of potential human rights issues identified through our supplier screening process. To support this, we routinely monitor adverse media relating to our supplier base, using screening tools designed to detect potential risks. This process enables us to identify and escalate human rights related concerns and where necessary, implement appropriate actions and controls for any suppliers found to be non-compliant.

## Awareness

Our induction programme provides employees with an overview of our Code of Ethics, including our commitment to human rights. All employees are required to complete Code of Ethics training and confirm that they understand what is required of them.

The core principles of our Code of Ethics, including our commitment to human rights, are embedded within our Supplier Code of Conduct. As part of our onboarding process, all third-party suppliers are required to agree to and comply with this Supplier Code of Conduct. Additionally, our global procurement teams receive training on human rights and modern slavery, including the procedures for reporting any concerns.

This Policy is also accessible on our corporate website and internal intranet.

## Reporting concerns and remediation

We continually promote openness and transparency and provide avenues for all Company Personnel to raise human rights concerns relating to National Grid plc and its subsidiaries. We have confidential helplines available globally, operating 24/7. Details of these helplines are available in this Policy, on our website, internal intranet, in our Code of Ethics, and in the Supplier Code of Conduct.

We take all allegations of human rights violations seriously. Our Ethics and Compliance team reviews all reported concerns in a fair and thorough manner and corrective action is taken where appropriate.

Each year, we monitor key metrics through our employee engagement survey and report summaries of these metrics, along with any allegations and outcomes to our Business Unit Committees and our Audit and Risk Committee.

Similarly, when potential or actual adverse impacts are identified within our supply chain, our Procurement and Chief Compliance Office teams follow established procedures to assess and address the issue. National Grid reviews reports of actual or potential non-compliance and acts on the findings of those reviews. More details are available in our Supplier Code of Conduct.

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