

# Modern slavery

Our statement on slavery  
and human trafficking 2024



nationalgrid

# Introduction

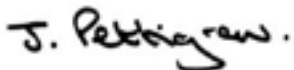
**At National Grid, we pride ourselves on being a safe and inclusive place to work, where our colleagues can expect good working conditions and fair pay. Everything we do is underpinned by our vision to be at the heart of a clean, fair and affordable energy future.**

We recognise that this commitment comes with a duty to incorporate respect for human rights across all our employment practices. To support this, we have introduced a new Human Rights policy that sets out our decent and fair working conditions expectations for National Grid colleagues and those working on our behalf. To further drive these commitments, National Grid is working with various non-governmental organisations (NGOs), including the Slave Free Alliance and Action Sustainability, to mutually review our approach to addressing potential modern slavery risks in our operation and supply chain.

We also understand the importance of policies, processes, and systems to safeguard our employees, and those who work on our behalf, ourselves against potential human rights issues. Therefore, we continue to utilise our in-house sustainability assessment tool as part of our strategic sourcing process that supports the identification of potential human rights risks.

In 2024, we will continue to ensure our human rights due diligence processes are sufficiently robust and proportionate to our risks. To support this, we will continue to work with the NGOs Action Sustainability and Slave Free Alliance to further develop our risk-based approach. Through these measures and by leveraging our 2023 lessons learned, developing our NGO partnerships and continuing external benchmarking with the UK's Churches, Charities and Local Authorities (CCLA) and recognising the new BSI Standard (BS 25700 Organizational Responses to Modern Slavery), 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 2024, 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 as listed on [the London Stock Exchange](#). I hereby sign this Statement on behalf of the Board of Directors of National Grid plc, following its approval in July 2024.



**John Pettigrew**  
Chief Executive

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



# Contents

---

---

---

---

---

---

---

---

---

---

---

# 1. Our progress summarised

---

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

Expand modern slavery/human rights checks into other parts of the organisation where existing site visits regularly take place.

Partner with Slave Free Alliance to review and enhance our approach on due diligence and risk assessment and work with Action Sustainability to improve responsible sourcing of solar panels across the industry.

Enhance our Modern Slavery KPIs based on best practice and the outputs of the work with Slave Free Alliance.

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

Human Rights questions have been included in our assurance systems and have been communicated across key areas in the UK, we are refocusing our efforts on sites where there is greater low skilled contractor activity and will be introducing similar requirements across our US sites.

We sponsored work carried out by Action Sustainability to produce a responsible solar photovoltaic (PV) procurement guidance that is available on their website. Membership with the Slave Free Alliance has been set up and work has begun on assessing our approach and helping us identify our higher risk areas.

We will continue to benchmark and review our KPI's and will consider any enhancements to these following completion of the review by the SFA and Action Sustainability

---

## 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. For 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 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 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 South West and South Wales. The ED business includes a Distribution System Operator (DSO) which is overseen by an independent panel.

### ◆ UK Electricity System Operator (ESO)

We currently operate as the electricity system operator across GB. Upon separation, this will form the core of NESO.

## 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 distribution networks. We own and operate gas transmission networks across Massachusetts.

### ◆ 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, which operates separately from our core regulated units, is focused on competitive markets across the UK and Us. Its portfolio includes electricity interconnectors, liquefied natural gas (LNG) storage and regasification, large-scale renewable generation, conventional generation and competitive transmission.

### ◆ 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

**We recognise the value of our people and employ a diverse workforce consisting of over 30,000 people globally, mainly in the UK and the US and operate policies and procedures to ensure the highest standards of ethical conduct. Diversity, Equality and Inclusion are particularly 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 remain 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 and incorporated into Our Supplier Code of Conduct.

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

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 to ensure that they have awareness of any associated human rights risks.



## Workforce Disclosure Initiative (WDI)

The Workforce Disclosure Initiative (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 have completed the WDI survey for the past 4 years and we continue to enhance our data year on year. We obtained a Scorecard of 82% overall for our 2023 submission, above the Utilities sector average. We obtained 100% in several key sections including Supply Chain Transparency, Responsible Sourcing and Supply Chain Working Conditions.

# Diversity, Equity, and Inclusion

Our aspiration is to one day be amongst the most inclusive, diverse, and equitable companies in business. We will do this by:

- empowering our people by embedding inclusion into everything we do
- building a diverse and innovative green workforce for our customers
- moving boldly and quickly to deliver organization wide equity via our processes
- using our voice, platform, and influence to create dialogue and elevate issues impacting people across the world.

Our people are supported by Employee Resource Groups that help build awareness and understanding of Inclusion and Diversity, so that everyone can be their true self and reach their full potential.

---

**31,425**

employees across the UK and US.

---

**24.6%**

of our workforce are female.

---

**56%**

of our workforce is based in the US.

---

**18.6%**

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

---

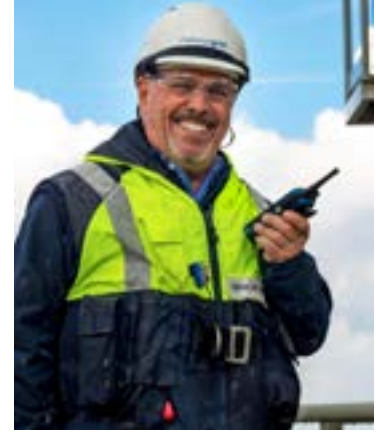
**44%**

of our workforce is based in the UK.

---

**83%**

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



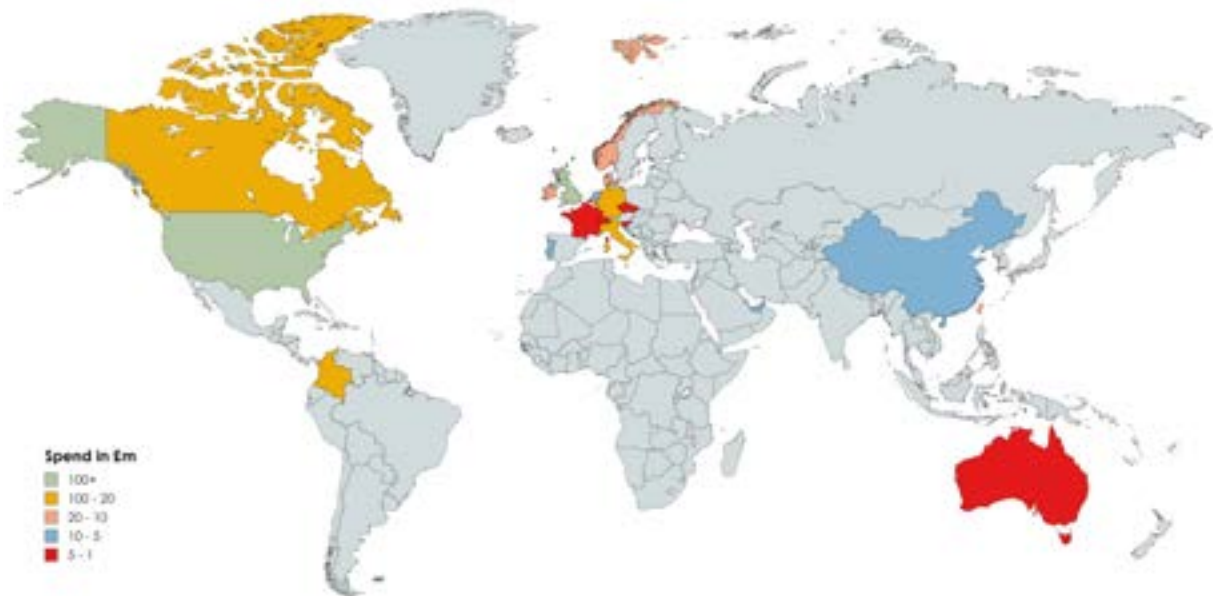


# Our supply chains

**We work with over 15,000 suppliers across our global organisation and the image below illustrates Tier 1 supplier locations where spend is over £1m.**

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

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



You can find more information about our supply chain



# Supply Chain Case Study



## Case Study

### Corrective Actions Taken in Solar Panel Supply Chain

#### What happened?

First Solar (a key Solar Panel supplier to National Grid Renewables) conducted three onsite third-party Responsible Business Alliance (RBA) Validated Assessment Program (VAP) audits at their solar panel manufacturing facilities in the United States, Vietnam and Malaysia. While the company's US and Vietnam operations achieved platinum status, the highest possible rating, the audits uncovered the fact that four ancillary service providers at its Malaysia facility fell short of First Solar's standards. During the audit of the facility in Malaysia, they identified four onsite service providers of cleaning and security services who had foreign migrant workers that were subjected to unethical recruitment including the payment of recruitment fees in their home countries, passport retention and the unlawful retention of wages.

#### What action was taken?

First Solar ensured that the onsite service providers returned all passports and unlawful wage retentions to the workers and have since updated their policies to prevent future fees. They also arranged RBA briefing sessions for the onsite service providers and contracted a third-party to investigate and develop a reimbursement plan to ensure the recruitment fees were paid back to both current and recent workers. All recruitment fees to the service providers' affected workers have now been reimbursed in accordance with RBA best practices. First Solar successfully completed its closure audit in Malaysia without any findings, achieving a platinum status which is the highest rating awarded by the RBA.

A finding relating to excessive voluntary working hours due to voluntary overtime was identified during the Vietnam audit and First Solar have introduced a monitoring report to track weekly hours ensuring that the work week does not exceed 60 hours and that all employees have at least 1 day off in 7. In May 2023, First Solar Vietnam completed an onsite third-party RBA VAP closure audit and successfully closed their single finding, earning a perfect score and achieving a platinum rating.

#### What have we learnt?

We have been engaging with First Solar to understand the processes they had in place that enabled them to detect this issue, one of the key learnings related to leveraging a robust third-party social audit such as the RBA VAP which included onsite interviews with workers hired by the service providers, as these issues may not have otherwise been detected. We arranged for First Solar to share their experience with the Utilities Against Slavery working group so that we could collectively discuss their approach and learn from their experience from detecting the issue through to ensuring victims were identified and recompensed. First Solar established a new industry benchmark for transparency by making public details of onsite third-party social audits conducted across its global manufacturing footprint in what is believed to be a first for the solar industry.

## 3. Our policies

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, which 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 are doing to our executive and audit committees.

Policy	Scope	Relevance to modern slavery
Code of Ethics.	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.
Supplier Code of Conduct.	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 including the Ethical Trade Initiative base code and the UK 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.
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.	References modern slavery and sets out the duty of all employees to be vigilant in guarding against and reporting unusual activity or payments
Contracted Service Provider Background Checking Policy.	This policy sets out the requirements for the background checking of contractors working for or on behalf of National Grid.	These requirements ensure that our contractors have the relevant rights to work and documents which include address history and previous employment checks
Human Rights Policy.	This policy sets out how we comply with applicable human rights laws and respect Internationally recognised human rights Standards	The commitments set out in this Policy ensure that we have internal governance and oversight of the required controls and support provision of decent working conditions for anyone that works for, or on behalf of National Grid
Group Speak Up Policy	This policy explains how concerns can be raised and how the company addresses those concerns. It sets out how to report a concern and what protection reporters can expect.	The policy applies to all colleagues contractors and any other parties working for or on behalf of National Grid and its subsidiaries

## Responsible Business Charter

During 2023 we have simplified and refreshed our Responsible Business Charter focusing on three core pillars: our environment, our customers and communities, and our people.

Our core pillars are underpinned by our responsible business fundamentals which includes governance and activities that are essential to everyday business, such as network reliability, health and safety, cyber security and compliance and ethics.

Our 2024 Responsible Business Report details progress against our charter commitments on an annual basis and showcases the activities we have underway across the business to help deliver against these.

## Grid for Good

Grid for Good supports four target groups. The aim is to inspire these groups, stimulate their understanding of our organisation, showcase employability opportunities associated with Net Zero and boost the likelihood of overlooked talent applying for National Grid roles. The four target groups and associated programmes are detailed below.

**Engage programmes for under 13 year olds** - outreach to inspire the youngest minds about Net Zero and build recognition for the National Grid brand and its purpose.

**Access programmes for 16 – 18 year olds** - in schools/colleges in under-served areas; promotion of and coaching for graduate opportunities.

**Excel programmes for low/zero income background undergraduate high achievers** - promotion of and coaching for graduate opportunities.

**Accelerate programmes for age 25+** who have been out of employment for more than seven years and have skills relevant to National Grid.

In FY24 National Grid colleagues volunteered 18,500 hours, delivering a positive impact and building engagement with the communities we serve.



To help support and protect those members of our communities that are most at risk from exploitation, Grid for Good is privileged to work with Catch 22 (a not-for-profit business with a social mission). Recently we began embedding regular direct work visits and work taster sessions for selected cohorts of care-leavers.

These young people come from some of the most challenging backgrounds imaginable and often, when direct care ceases at 16 years old they can easily be vulnerable to exploitation.

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

## Our Grid for Good charity partners

Engage:	
Primary	Engineer
Earth Cubs	Now Press Play
Fun Kids	Access
Catch 22	Young Enterprise
Excel	Generating
Genius	RAE GEEP
IET	

## 4. Due diligence

**We continue to collaborate across the industry and work with our suppliers to improve approaches to identify and mitigate human rights risks.**

### Systems and process controls

We pre-qualify our strategic UK procurement activities using a vendor registration system operated by Achilles called the Utilities Vendor Database (UVDB). We are members of the 'Utilities Against Slavery' Working Group who proposed enhancements that were implemented into the Achilles UVDB onboarding questions asked in relation to modern slavery, ensuring that this goes beyond basic compliance. We continue to work with our strategic sourcing team to explore how we can enhance the qualification of our US suppliers using relevant systems and process controls.

We continually review external media and use a screening service to check for adverse media, reports, fines, or sanctions against our direct suppliers. We have a process in place to act on anything that is highlighted, in a timely and appropriate way. This involves an initial risk assessment of any items identified and those that are categorised as high risk are immediately escalated and triaged, the triage brings together appropriate representatives from the relevant areas of the business to determine the course of action. Any reported instances of modern slavery related prosecutions or investigations are automatically deemed to be high risk.

We have included human rights checks into our assurance system (I Auditor) and have tested these in parts of our UK business. So far this has not highlighted any issues and we are reviewing these checks within our business to identify and target work sites that are considered higher risk due to the volume of contracted employees and the type of work being carried out. To support this, we have engaged with the relevant departments that manage the decommissioning of sites across the National Grid estate and those that manage some of the assurance activities associated with our large infrastructure projects, for example. We have tested a self-assessment process for the vessels that are carrying out marine surveys that support these projects, and we are building ongoing checks into the marine assurance programme.

We are also planning to assess the controls that our key UK and US facilities suppliers have in place to identify and address any potential risks, recognising that ancillary services are known to carry a higher risk due to the nature of the work and potential higher turnover of contracted employees.

### Frameworks

We have previously developed a Controls Framework using the [Building Research Establishment Environmental Assessment Method](#) that was created by the Supply Chain Sustainability School, the [Building Research Establishment Environmental Assessment Method](#) which includes a checklist against the key areas for consideration to understand and address potential modern slavery risks.

For some of our key infrastructure projects in the UK we have adopted the [Building Research Establishment Environmental Assessment Method](#) (Building Research Establishment Environmental Assessment Method) Infrastructure standard, an award scheme aimed at improving the sustainability of projects and supporting delivery of some of the key business priorities and commitments. This requires us to provide evidence to demonstrate compliance with various criteria including aspects around ethical labour practices, driving awareness at the project level, and raising the profile of the importance of the topic in the wider business.

We are working with the Slave Free Alliance and Action Sustainability to assess our processes, systems and practices in line with the recognised guidance BS 25700 – Organisational response to modern slavery. The aim is to align the output of those frameworks, and work with our business operations to ensure the right proportionate measures are in place addressing any identified or potential gaps in our approach.



---

## Working together to improve industry standards

We strongly believe that sharing best practice and learning from peers and subject matter experts helps to drive up standards right across the industry. We regularly engage with organisations through various industry groups to discuss key areas for collaboration and action. We continue to undertake benchmarking research to build best practice into our approach where relevant.

We are members of different 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:

---

### Action Sustainability

In 2023, we partnered with Action Sustainability to fund the development of a free, publicly available **procurement guidance document** that focuses on addressing modern slavery and labour exploitation in Solar PV supply chains. The guidance outlines critical steps to address these issues through the commercial lifecycle and offers insights into effective solar PV procurement due diligence, with practical guidance for implementation going beyond minimal compliance.

---

### United Nations Global Compact (UNGC) Human Rights Accelerator Programme

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) Modern Slavery Working Group

We have been actively involved in the SCSS Labour working group and we were the first client level signatory, alongside many of our main contractors of the People Matter Charter. The **People Matter Charter** was created to help organisations and their supply chain address potential human rights, safety and inclusion challenges in one workforce strategy. The Charter has eight commitments that can apply to any organisation, of any size. This flexibility provides us with a holistic approach to addressing the labour issues in the industry. We promote the Charter with our supply chain to provide them with a framework that can support their due diligence in their own value chain.

We have also contributed to prioritising the key focus of the Working Group in line with our business supply chain sustainability strategy priorities. These primary priorities include:

- developing a due diligence maturity guidance
- creating a standard approach to supply chain mapping
- Making existing resources more accessible - learning pathways and new search function
- Showcasing strategic approaches to modern slavery
- Collaborating to drive impact.

These priorities will support the development of a guidance document to provide a consistent approach to risk assessment, with examples of how it could be applied to the following key categories of spend: Material Categories (steel, Personal Protective Equipment (PPE), wind turbines, batteries, stone) and Subcontract/Service (ground workers, labour agencies, cleaning services, security, waste). The guidance will cover different approaches for Subject Matter Experts (SME's), 'New Beginners' and Mature organisations.

We endeavour to continue to promote the use of the School resources and tools internally and with our supply chain.

---

### Chartered Institute of Procurement and Supply (CIPS)

We are promoting Chartered Status within our procurement community where individuals need to demonstrate commitments to ethical professional behaviour and evidence professional relevance and expertise through continuing professional development (CPD). The latter requires completion and records 30 hours of CPD annually and a current CIPS Ethical Procurement and Supply Certificate (Ethics test).

---

### Slave Free Alliance (SFA)

We are members of the Slave Free Alliance which provides us with access to tools and resources in addition to an assessment of our modern slavery strategy.

---

### Utilities Against Slavery (UAS)

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

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

We have been an active member 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 that may reside in our respective supply chain. For example, we invited First Solar to one of our scheduled meetings to share their experience on how they identified unethical business practices in their supply chain and how they addressed remediation. Lessons learned from First Solar supports the objectives of the working group.

---

## Monitoring and continual improvement

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

- the new British Standard on Modern Slavery, **BS 25700: Organizational responses to modern slavery – Guidance**, which provides organisations guidance on how to manage 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 sets out how UK Government departments must take action to ensure modern slavery risks are identified and managed in government supply chains.
- the **EU Directive on corporate sustainability due diligence**, which aims to foster sustainable and responsible corporate behaviour and to 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 aim to oblige companies to prevent human rights and environmental harms “so far as is reasonably practicable” on their “own operations, products, and services, those of their subsidiaries, and throughout their value chains.



## 5. Risk assessment

We provide 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's webpage.

---

### Risk assessment and management

We have a sustainability assessment tool that uses the risk assessment criteria that was previously 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.

We recognise the need to revisit our supplier modern slavery risk assessment processes beyond our initial pre-qualification stage and are working with Slave Free Alliance and Action Sustainability to develop an enduring structured and proportionate approach, that will help target our resources at those suppliers that are identified as potentially high risk. Our partnerships with the Slave Free Alliance and Action Sustainability will also help us further enhance our remediation and escalation processes in the event of labour issues in our value chain.

From FY25 onwards, we will be working with an external organisation to complete site ethical surveys on selected sites that meet specific criteria. This will involve working with relevant stakeholders from our organisations and our supply chain to identify the best course of actions, including the next steps for continuous monitoring.





## 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. We have recently updated our Code of Ethics and have developed and published a supporting Speak Up policy that further encourages speaking up, by providing information on how to report a concern, what information to provide and what you can expect when you do. We are updating our supporting literature and will be reissuing materials for display at our offices and remote sites.

We take all allegations of any type of unethical or illegal behaviour very seriously and we have dedicated ethics teams and professional investigators that deal with all reported concerns sensitively and thoroughly. We carry out independent investigations and take any relevant action. An overview of the allegations that are received by the Ethics team and associated outcomes are reviewed at our Group Ethics, Risk and Compliance Committee, which is attended by 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 supporting metrics through our employee engagement survey.

We also provide summaries of metrics, allegations and findings to our Business Unit and Function led Ethics, Risk and Compliance Committees and our Audit & Risk 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 weblink.

Through our recent employee engagement survey, we know that 81% of our workforce believe they can safely raise an ethical or compliance concern using our helplines.

### Training and awareness

Our induction programme provides training and awareness of our company values and our Code of Ethics 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 (SCoC) including our approach to combating modern slavery.

Our Procurement activities and controls are managed centrally on behalf of the National Grid Business Units and incorporate all the subsidiaries that are listed at the end of this Statement. We have continued to upskill our procurement professionals to raise awareness of potential modern slavery risks that may lie in our value chain and how we can contribute to preventing those risks. This has involved the development and delivery of Sustainability Foundation level training, and further sessions are planned that will focus on Human Rights. We have also delivered five educational webinars in partnership with the Supply Chain Sustainability School (SCSS) to outline the bigger picture between modern slavery risks prevention and the role of procurement in limiting those risks. These webinars included combatting modern slavery, transparency in the supply chain, sustainable procurement, bridging the gap, and material efficiency. We are working closely with the SCSS to strategize and deliver better outcomes for our customers.

We have delivered face to face awareness training to the assurance managers in the Strategic Infrastructure and Land & Property business areas to provide an overview of Modern Slavery and to introduce the assurance checks that have been incorporated into our assurance system. We will continue to do this as we take a risk based approach to identifying further areas across the organisation where we can utilise the existing site visit assurance programmes.

We are encouraging our suppliers to utilise the free training and resources that are available through the SCSS. We continue to promote the use of modern slavery learning pathways, resources and tools available in the School.

As part of a collaborative working group within the SCSS utility sector clients have been working together to provide one voice and a clear direction for addressing risks of modern slavery within their value chains and have created several learning pathways for key topics including Modern Slavery. These have been promoted with our supply chain and adoption can be tracked through our priority supplier dashboard.

## 7. Measuring our effectiveness

We currently monitor the following measures to check our progress and programme effectiveness. The review, that is currently being carried out by Actions Sustainability and Slave Free Alliance, will include any recommended enhancements to these measures.

Measure	Reason for measure	2021-2022	2022-23	2023-24
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 relating to modern slavery, enabling actions and controls to be put in place.	1	0	0
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.	1	0	0
Number of related issues reported via other Channels.	Details of any related issues received outside of the formal reporting channels			1*
Percentage of our top 25 supplier organisations (based on spend) that have a publicly available Modern Slavery Statement or equivalent policy in place.	This provides an additional monitor to see what actions our suppliers are taking to address the risks of Modern Slavery in their supply chains		48%	80%

\*This relates to a concern that was self-reported by First Solar, please refer to [here](#) for details.

## 8. Focus areas for 2024

We recognise and fully support the need to demonstrate continual improvement and commitment to tackling the risk of modern slavery in our business and supply chains and will be building on our forward looking programme using the recommendations that we gather via the current review that is taking place, the majority of our commitments for 2024/25 will focus on this work and are detailed below. We continue to develop realistic and achievable commitments that will make a difference and enhance our approach. Detailed below are our commitments for 2024/25

- Continue to work with SFA and AS, to develop a plan to review and implement recommendations from their assessment of our Statement, and approach to risk assessment and due diligence.
- Conduct on-site labour audits during the year, focusing on construction sites where there are multiple contractors.
- Review our escalation process using best practice approaches and learning from the experience of others, whilst ensuring victim support is sufficiently addressed.

---

### Governance

Our Group Ethics, Risk and Compliance Committee assesses our approach to modern slavery and oversees progress. They 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



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

---

## UK

National Grid Holding One plc  
Lattice Group Limited  
National Grid Holdings Limited  
National Grid Grain LNG Limited  
National Grid Electricity Transmission plc  
National Grid Electricity System Operator Limited  
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.  
National Grid Renewables Development, LLC

National Grid plc  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick CV34 6DA  
United Kingdom

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