

Our policy on Human Rights

Version 1

Policy statement

At National Grid, our vision is to be at the heart of a clean, fair and affordable energy future. Creating a clean, fair and affordable energy future is what society demands and what we demand of ourselves. It's the right thing to do for our people, customers, communities and for the future of the planet.

One of our key values which underpins everything we do is “Do the right thing”. Our Human Rights Policy, along with its supporting documents, ensures that we live this value and hold ourselves accountable to it by respecting the rights of our workforce, the people involved in our value chain, and those impacted by our operations. This involves actively avoiding human rights infringements and addressing any impacts where they occur, as set out in the UN Guiding Principles on Business and Human Rights.”



John Pettigrew

Chief Executive
National Grid

Principle

National Grid plc (“National Grid” or “Company”) 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 OECD Guidelines for Multinational Enterprises, the UN Universal Declaration of Human Rights, the UN Guiding principles on Business and Human Rights, and the UN Sustainable Development Goals. National Grid’s Human Rights Policy (“Policy”) and its supporting documents outline our commitment to human rights.

UN Sustainable Development Goals supported by this policy



Scope, Governance and Oversight

The 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.

National Grid plc Board of Directors is responsible for providing governance and oversight of National Grid’s compliance programs, 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 the 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 in the supply chain, and for setting expectations with our suppliers on the importance of human rights.

National Grid’s Executive Ethics, Risk and Compliance Committee reviews and approves the Policy.

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	Further Reading
<p>Complying with minimum age requirements and not hiring individuals who are underage.</p>	<p>Recruitment checks are conducted to ensure that we do not hire those who are underage. We also track the age bands of our workforce and publicly disclose this information in our Responsible Business Report.</p> <p>We engage third parties to complete background checking, including social security verification where date of birth is validated.</p>	<p>Supplier Code of Conduct</p> <p>Responsible Business Report – Data tables</p>
<p>Eradicating all forms of forced labour and slavery and working with our partners to do the same.</p>	<p>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.</p> <p>We produce an annual statement which sets out the steps taken to monitor and manage any potential risk of modern slavery in our supply chain and have recruitment policies in place to mitigate the risk in our direct employee workforce.</p> <p>National Grid participates in various consultations with external bodies such as the UN Modern Slavery Working Group.</p>	<p>Modern slavery statement</p> <p>Supplier Code of Conduct</p>
<p>Providing a healthy, safe, and secure workplace for all employees and contractors.</p>	<p>National Grid has health and safety policies that apply to all National Grid employees and colleagues who work on our assets.</p> <p>To protect our people, assets, and the communities we serve, we apply risk and control measures in our activities across our businesses.</p>	<p>Health and Safety Policy</p> <p>Supplier Code of Conduct</p> <p>Code of Ethics</p>
<p>Providing an inclusive, equitable and fair working environment where everyone is treated with respect and dignity.</p>	<p>We have an inclusion and diversity policy which sets out National Grid’s commitment to providing an inclusive, equitable, and fair working environment for all.</p> <p>We have 17 active Employee Resource Groups (ERGs), which provide a crucial support network for everyone who works at National Grid, helping to raise awareness of all the diverse types of people who work within our organization.</p>	<p>Inclusion and diversity website (including DEI strategy)</p> <p>Responsible Business Report – Data tables</p> <p>Code of Ethics</p>
<p>Providing a fair salary/compensation and good conditions of employment.</p>	<p>We are committed to maintaining fairness across the organisation for pay and work.</p> <p>We meet or exceed statutory minimum wage levels in the jurisdictions where our employees are based – the U.K. and U.S.</p> <p>Our employees are offered several additional benefits via our reward scheme including flexible hours, savings, childcare, wellbeing, and financial guidance, etc.</p>	<p>Responsible Business Report – People pillar</p>

We are committed to	Safeguards	Further Reading
<p>Respecting the rights of employees to join an independent trade union, engage in collective bargain, and exercise freedom of expression.</p>	<p>We have a collective bargaining agreement with four recognised trade unions in the UK. This is the formal mechanism for consultation and negotiations on a range of matters. We have an employee relations framework at national and local level which is used 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 U.S, we commit to collective bargaining with 22 unions, setting 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>Responsible Business Report – People pillar</p>
<p>Ensuring that our supply chain partners adhere to our global Supplier Code of Conduct and take steps to respect human rights.</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 to the UN Guiding Principles on Business and Human Rights, the United Nations Global Compact Ten Principles, the International Labour Organisation and the US Trafficking and Violence Protection Act 2000.</p> <p>Suppliers are expected to comply with our Supplier Code of Conduct, which, amongst other things, lays out our commitment to human rights.</p> <p>Additionally, we have supplier screening and pre-qualification processes relating to human rights.</p> <p>We expect our suppliers to protect the rights of indigenous people, refugees, and migrants, in line with relevant human rights policies defined in our statement.</p>	<p>Supplier Code of Conduct</p> <p>Modern slavery statement</p> <p>Responsible Business Charter</p>
<p>Respecting the human rights of our customers and individuals in the communities we serve.</p>	<p>National Grid’s Responsible Business Charter outlines our commitments to our customers and the communities we serve.</p>	<p>Responsible Business Report – Communities pillar</p>

National Grid expects Company Personnel, the entities that it owns, the entities in which it holds a majority interest, as well as partners, supply chain and third-party contractors, to adhere to the Policy. In the event of non-compliance, National Grid will respond appropriately.

Due Diligence and Risk Management

Assessment and tracking of salient human rights risk

National Grid has assessed and identified the salient human rights risks in our business, and these have been included in our Policy commitments.

We have developed an Ethics Business Management Standard (BMS) highlighting the minimum requirements that all Business Units must adhere to.

As a business, we will continue to assess the human rights risk of our direct workforce as well as the people in our supply chain. We also actively engage with various external bodies to ensure we assess and address salient human rights risk in line with good practice.

In our business and supply chain, we track human rights risk utilising the Dow Jones screening and Sphera risk monitoring. In addition, we have several preventative controls in place to minimise the risks in the supply chain, for example UVDB audits and pre-qualification questionnaires.

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We participate in various consultations with external bodies such as the UN Modern Slavery Working Group and Utilities Against Slavery and we work closely with customers, communities and local authorities.

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Continual assessment

We continually review the measures we have in place to check our progress and ensure our programmes are effective and we use this information to build our future plans. For example, one of the measures is ‘Number of potential human rights issues identified through our supplier screening process’. To measure this, we continually monitor adverse media reports in our supplier populations and screening tools are in place to detect issues. This provides a route for identifying and converting issues relating to human rights, and if applicable, enabling actions and controls to be put in place for any non-compliant suppliers.

Awareness

Our induction programme provides awareness of our Code of Ethics, which covers human rights. In addition, the Policy is made available on our corporate website and internal intranet.

The key elements of our Code of Ethics are incorporated into our Supplier Code of Conduct including our approach to human rights. Our global procurement professionals receive training on human rights, modern slavery, and how to embed our sustainability assessment tool, as well as understanding of the processes for raising concerns.

We have also raised awareness of our Supplier Code of Conduct within our contract management community.

Reporting concerns and remediation

We continually promote openness and transparency and provide avenues available to 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 on our website, in our Code of Ethics, in the Supplier Code of Conduct, and on posters that are displayed in our offices and at our construction sites.

We take all allegations of human rights violations seriously and we have dedicated Ethics and Compliance Team members to address reported concerns in a fair and thorough manner. Where necessary and appropriate, we take corrective action.

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 and Risk Committee.

Similarly, there are dedicated procedures that are followed by our procurement team where adverse impacts are identified in our supply chain. National Grid review any reports of non-compliance and take action based on the results of the review. More details are available in our Supplier Code of Conduct.

UK External/Focus Helpline

(24 hours a day, seven days a week)

Freephone: 0800 298 6231

Email: report@seehearspeakup.co.uk

US External/Alertline

(24 hours a day, seven days a week)

Toll-free: 1-800-465-0121

Web: nationalgrid.ethicspoint.com

Version history

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Policy owner	Michael Watson
Role	Group Chief Compliance Officer
Team	Ethics & Compliance
Approved by	Group Executive Ethics, Risk & Compliance Committee
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