

Human Rights Report and Modern Slavery Statement

2026



nationalgrid

Introduction

At National Grid, we are committed to ensuring that the people and communities who enable our work are treated with dignity, fairness, and respect.

Modern slavery is a pervasive and evolving global issue, and we recognise that no organisation is immune to its risks. Over the past year, we have continued to collaborate with specialist organisations, including Slave-Free Alliance (SFA) and Action Sustainability (AS), and have benchmarked our approach against recognised standards such as the Organisational Responses to Modern Slavery (BS 25700). These partnerships have strengthened our due diligence procedures and enhanced the transparency, consistency, and effectiveness of our processes, supporting more effective identification and management of human rights risks over time.

This National Grid Human Rights Report and Modern Slavery Statement ("Statement") sets out the progress we have made and the actions we are taking across the business to prevent and address modern slavery. It also reflects the ongoing implementation of our Human Rights Action Plan, which provides a clear and structured roadmap for further maturing our approach. Through enhanced supplier engagement, targeted capacity-building at high-risk sites, and strengthened escalation and remediation pathways, we are working to embed long-term improvements that support a resilient and ethically responsible supply chain.

We recognise that tackling modern slavery requires constant vigilance, continuous improvement, and sustained collaboration. We have made real progress to date, and our collective efforts across our UK and US operations, in partnership with our suppliers and stakeholders, will continue to drive a meaningful and lasting impact.

This Statement covers National Grid's financial year ending 31 March 2026, and 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 listed at the end of this statement. This Statement was approved by the Board of Directors of National Grid plc on 12 May 2026 and is signed on behalf of the Board in accordance with section 54 of the Modern Slavery Act 2015.

Zoe Yujnovich

Chief Executive and Director
National Grid plc



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

Contents

1. Our progress summarised

In our 2025 Statement, this is what we said we would do:

Roll out the first phase of our three-year action plan, working with Slave-Free Alliance (SFA) and Action Sustainability (AS), to integrate recommended Key Performance Indicators (KPIs) into our contract management processes for high-risk categories based on their assessment of our modern slavery risk assessment, and due diligence processes.

Expanding our human rights due diligence activities, including targeted site-based assessments and engagement with key suppliers, ensuring that future human rights capacity-building exercises are built on a foundation of strong supplier relationships and operational readiness.

Refining our escalation and remediation framework to ensure that any potential labour exploitation risks are managed effectively, with clear processes for incident response, victim support, and continuous learning.

This is what we have delivered against the commitments we made:

We launched our first Human Rights Action Plan in collaboration with SFA, focused on embedding human rights considerations into our third-party risk management processes, enhancing the capabilities of key suppliers, and working with organisations such as the British Standards Institution (BSI) to further assess how our practices benchmark against BS 25700. We also compared our existing KPIs with those of peer organisations and recognised best practice to ensure our targets drive meaningful and measurable impact.

Our next steps include prioritising these KPIs and reporting on progress from FY27 onwards. During FY26, we used these draft KPIs internally to inform risk prioritisation and supplier engagement, recognising that further refinement is required before public reporting.

In FY26, we delivered a human rights capacity-building and site engagement initiative with Murphy, one of our Great Grid Partnership partners. This engagement included site-based briefings, direct conversations with our employees and those working on our behalf, and a dedicated awareness-raising training session for the site team. The findings highlighted a strong safety culture across our value chain, while also identifying areas where controls and awareness could be further strengthened to mitigate potential or emerging human rights risks. We recognise that site-based engagement provides insight at a specific point in time, and that the absence of identified issues does not eliminate the possibility of underlying or emerging risks.

Further details are set out in the Due Diligence section of this Statement.

We will continue to collaborate with our business partners and suppliers across the UK and the US to increase awareness of human rights risks throughout our value chain.

We have refined and tested our human rights escalation and remediation framework with Murphy as part of the capacity-building exercise. The framework outlines the key steps for responding to human rights concerns and clearly defines the stakeholders involved at each stage. Following these enhancements, the updated framework has been embedded into our wider procurement incident management process, enabling a more integrated and effective approach to managing potential human rights risks across our value chain. We have also developed a Supplier Human Rights Toolkit to provide suppliers with practical guidance on identifying, mitigating, and responding to human rights risks within their own operations.

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. When we live our values, we show National Grid at its very best.



Our vision

is to be at the heart of a secure, affordable and clean 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 Southwest and South Wales. The ED business includes a Distribution System Operator (DSO) which is overseen by an independent panel.

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 and gas distribution networks.

◆ 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 runs separately from National Grid plc's core regulated operations, across the UK, Europe, and the US, developing, operating, and investing in large-scale energy infrastructure projects. Its portfolio includes subsea electricity interconnectors, solar generation, competitive electricity transmission, battery storage, and conventional generation and liquefied natural gas regasification and storage.

◆ 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

At National Grid, we truly value our people and take pride in our workforce across the globe, primarily in the UK and the US. Our commitment to maintaining the highest standards of ethical conduct is reflected in our robust policies and procedures

As a responsible business, we take pride in treating all employees fairly and ensuring they thrive in a respectful, safe, and inclusive environment. Our recruitment programme is designed to provide equal opportunities, comply with local legislation, and guarantee that all employees have the appropriate rights to work. We use employment agency partners to attract temporary workers and they are contracted to uphold the same standards of employment that we offer our direct employees. Contract Managers actively oversee these agencies, ensuring they meet our rigorous employment requirements, including relevant screenings, paying the Real Living Wage, and adhering to the “employer pays” principle, which is a commitment by employers to cover all costs associated with the recruitment of workers, rather than passing these costs onto the workers themselves. This means that no employee should ever have to pay to become a temporary or permanent worker within our organisation or supply chain.

We closely monitor our practices, believing that our policies and procedures reduce the risk of forced or trafficked labour being employed directly by National Grid or its employment agencies, while recognising that vigilance and ongoing monitoring remain essential. In the UK, we are committed to paying our employees, trainees, and contractors working on our behalf at least the Real Living Wage, as determined by the Living Wage Foundation. In the US, we ensure that all our employees receive at least the minimum wage, with prevailing wages paid in New York. Supporting our employees and their families is a top priority. We offer comprehensive internal health and wellbeing programmes, along with access to a confidential employee assistance helpline that provides support in areas such as emotional well-being, debt management, and legal advice. We also encourage our employees to join trade unions, and, in the UK, we actively engage with them through HR to raise awareness of associated human rights risks. National Grid is building a workplace where everyone feels valued, supported, and empowered to succeed.



Workforce Disclosure Initiative (WDI)

The 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.

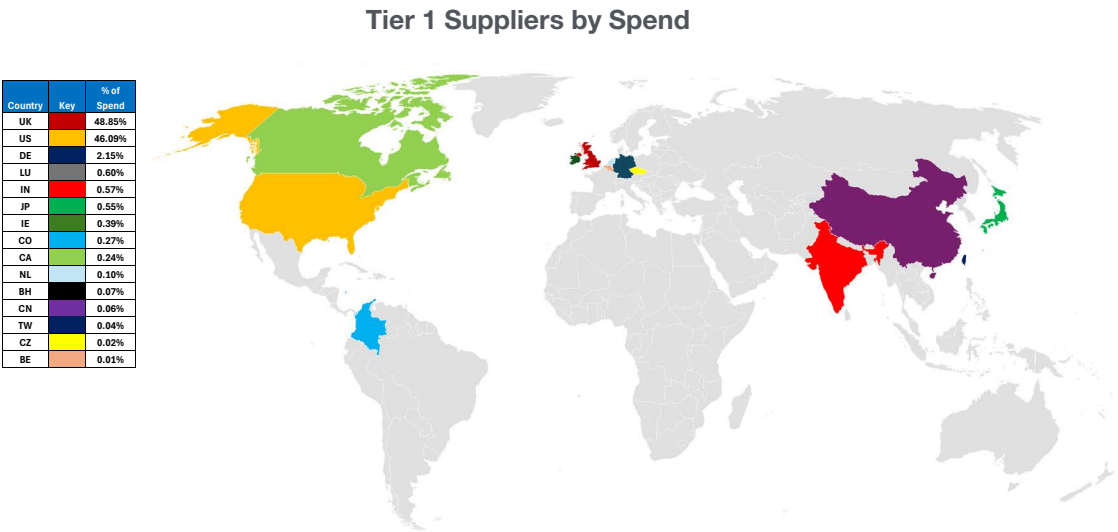
National Grid has completed the WDI survey for the past seven years, continually enhancing our data each year. For our FY25 submission, we achieved an overall Score of 88%, an increase of 3% on the previous year. This score recognises the extent to which we provided substantive data across the question set and is 21% above the utilities average score.

Our supply chains

We work with over 15,500 suppliers across our global organisation. The image below illustrates Tier 1 supplier locations where spend exceeds £100k per year. It illustrates that most of our Tier 1 spend is concentrated in countries assessed as low-risk according to the Global Slavery Index. We are introducing additional screening tools that will help us look deeper into our supply chains.

The Risk Assessment section of this Statement describes key controls that help identify and mitigate risks in our supply chain.

Tier 1 Supplier spend (£100k+) by geographical location.



Percentage of spend (greater than £100,000) by Tier 1 supplier location

More information about our supply chain can be found



3. Our policies

Our policies, summarised below, establish the standards required to prevent human rights breaches, including modern slavery, in the workplace and our supply chains. These policies are supported by an internal business management system that outlines our actions and procedures, ensuring we uphold our values. We consistently monitor compliance with these policies and report our progress to the executive and audit committees.

Policy	Scope	How this policy helps minimize and manage the risk of Human Rights breaches
Code of Ethics	This is our company code of conduct, which applies to all employees and outlines our values as well as the expected behaviour of employees while working at National Grid.	Our code sets our stance on harassment, discrimination, bullying, sexual harassment, and human rights, outlining National Grid's commitment to a zero-tolerance policy towards all forms of human rights misconduct. Additionally, it details the channels available for raising concerns and the measures we will take to protect those who 'Speak Up' about any issues.
Supplier Code of Conduct	This document is reviewed and updated annually and distributed to all our suppliers as it forms part of the terms and conditions of doing business with us. It outlines the standards to which we expect our suppliers to adhere to and encourages them to extend these standards throughout their own supply chains while working with National Grid.	Our code sets out our expectations for suppliers regarding key international labour standards, including the Ethical Trade Initiative Base Code, UK Real Living Wage requirement, and New York Prevailing Wage. We encourage all suppliers to publish a modern slavery statement, regardless of their legal obligations. This also details the channels available for raising concerns.
Recruitment (internal)	Our internal recruitment policies guarantee that employees receive equal opportunities, possess the necessary rights to work, and are hired in accordance with all legal requirements.	Our implemented recruitment checks protect human rights by reducing the risk of directly hiring individuals who are being trafficked or forced to work.
Disciplinary (internal)	This policy outlines the actions that will be taken if employees intentionally violate the requirements specified in the Code of Ethics.	All employees know what is expected of them and the consequences for misconduct, including human rights violations.
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.	Establishes the responsibility of all employees to remain alert to and report any suspicious activities or payments, which could potentially relate to human rights violations.
Global People Security Policy	This policy outlines the requirements for conducting background checks on prospective employees and contractors working for or on behalf of National Grid.	Conducting background checks ensures that the individuals we employ or those that work on our behalf have had their identity verified and confirmation of right to work in the relevant country, minimizing the risk of employing individuals who may be exposed to being a victim of forced labour or human trafficking.
Human Rights	This policy outlines the process for raising concerns and how the company responds to them. It details the steps for reporting a concern and the protections that reporters can anticipate.	The commitments outlined in this policy guarantee that we maintain internal governance and oversight of the necessary controls, supporting the provision of decent working conditions for all individuals working for or on behalf of National Grid.
Group "Speak Up" Policy	This policy outlines the process for raising concerns and how the company responds to them. It details the steps for reporting a concern and the protections that reporters can anticipate.	The policy is applicable to all employees, contractors, and any other individuals working for or on behalf of National Grid and its subsidiaries.
Sanctions & Recusal Policy	Outlines the company policy and guidance to assist National Grid employees in complying with relevant economic sanctions laws and regulations.	National Grid has established processes to screen parties to ensure that we do not engage in business with individuals or entities that have been sanctioned, including those sanctioned under US, UK, and EU sanctions regimes related to human rights.

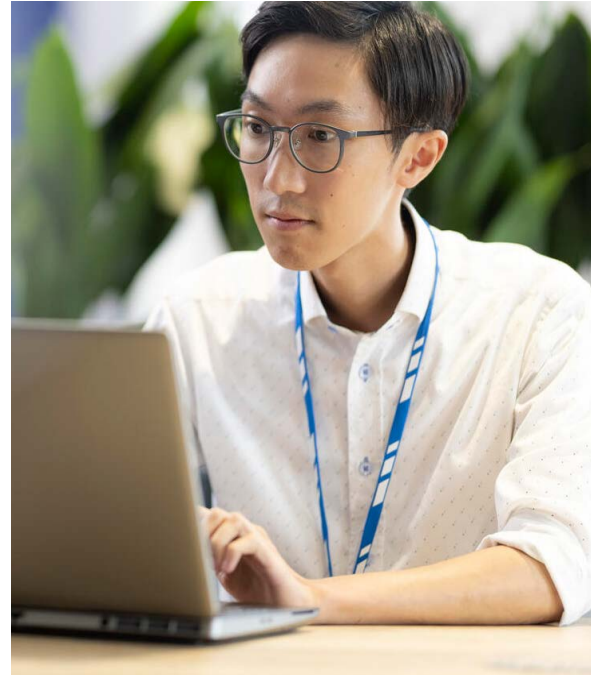
Responsible Business Charter

Our Responsible Business Charter is built on three core pillars: our environment, our customers and communities, and our people. These pillars are supported by our responsible business fundamentals. Responsible business practices are integral to our purpose, embedded in our values, and reflected in our strategic priorities.

Our responsible business fundamentals include commitments to:

- **Compliance and Ethical Business:** We adhere to our Code of Ethics, shaped by our values and behavioural expectations, ensuring compliance and ethical conduct in all our activities.
- **Promoting and Respecting Human Rights:** We uphold our Human Rights policy, promoting and respecting the rights of everyone working with us.
- **Decent Working Conditions and Fair Pay:** We provide an inclusive, safe, and supportive working environment.

Our Responsible Business Charter ensures that we conduct our business with respect, fairness, and accountability. By embedding these principles into our operations, we actively work to mitigate the risks of slavery and human trafficking.



Social Mobility Initiatives at National Grid

Social mobility initiatives can play a crucial role in protecting individuals from human trafficking and exploitation by addressing the root causes of vulnerability and providing opportunities for upward mobility. The initiatives include education and skills development, economic empowerment, awareness and advocacy, support networks, policy and legal reforms, and access to essential services.

To help support and protect those members of our communities that are most at risk from exploitation, National Grid is privileged to work with Catch 22 (a not-for-profit organisation with a social mission). This organisation delivers regular direct work visits and trial work experience sessions for selected cohorts of care-leavers and those at risk of different forms of exploitation.

Our initiatives not only open doors for individuals but also play a crucial role in safeguarding vulnerable members of our communities from exploitation. Together, we are building a brighter, more inclusive future where everyone has the chance to thrive.



4. Risk management

Controls Framework

Following development of our Human Rights control framework informed by the Supply Chain Sustainability School (SCSS) and the ETI Modern Slavery Statement Framework, we are working to embed these controls within our Enterprise Risk Management framework. Our documented Human Rights risks form part of a defined set of enterprise-level risks, providing a consistent foundation for compliance risk management and enabling evidence-based monitoring and assessment through control testing. Over the next 12 months we will implement first-line self-assessment across the Human Rights controls framework and agree an independent second-line controls testing programme for key controls.

Supplier Risk Assessment and Management

Our approach to assessing risks within our supply chains has continued to evolve, drawing on learning from previous experience to help shape and strengthen our controls, and we partnered with AS to undertake a gap assessment of our sustainable procurement practices against BS 25700: Organizational Response to Modern Slavery. This risk assessment identified categories with higher inherent human rights risks, such as low-paid or low-skilled work, temporary labour, vulnerable demographics, and materials or activities sourced from high-risk countries. These insights have helped clarify the categories that require prioritisation for human rights due diligence, including products and services relating to our network equipment, network construction, High Voltage Direct Current (HVDC) links, and Indirect Operations.

In January 2025, we introduced the Ariba Supplier and Lifecycle Performance (SLP) system, for any new supplier engagements, creating a single digital platform for supplier onboarding and lifecycle management. This has digitised the checks that were previously conducted manually, streamlining our processes, enhancing transparency, and improving overall efficiency and consistency.

During onboarding, the Ariba system automates the following to confirm that:

- the supplier has agreed to adhere to our Supplier Code of Conduct;

- the supplier has disclosed any incidents within the past five years relating to key topics, including modern slavery and human rights violations; and
- our supplier screening tools have not identified any adverse issues.

Any disclosures or screening alerts are reviewed by the Procurement Supply Chain Risk team before a supplier can be approved and qualified.

Our screening tools monitor a range of event types. For modern slavery and human rights related risks, these include issues such as human rights violations, genocide, war crimes, human trafficking, kidnapping, abduction, unlawful detention, and abuse.

If concerns are flagged at this initial stage, the relevant risk subject matter expert is engaged, and discussions will take place with the supplier to understand the actions they have taken to mitigate the issues before any decision is made regarding qualification and acceptance onto our system.

Suppliers are invited to participate in sourcing events through the ARIBA sourcing module, where they are advised of the minimum requirements the awarded vendor will be required to meet. The level of information requested at this stage depends on the inherent risk associated with the goods and/or service being provided, ensuring that any potential risks are appropriately addressed and mitigated early in the process. For human rights verification, these additional requirements are currently managed via Achilles for our strategically sourced suppliers. From FY27, we plan to incorporate these requirements into the ARIBA sourcing module, enabling them to be requested directly as part of sourcing events and allowing greater flexibility and proportionality in the level and depth of information sought, based on assessed risk.

In 2026, alongside our existing screening tool (Moody's), we are introducing an additional solution (Prewave) that will provide alerts for any strategically sourced suppliers associated with our core delivery programmes. This tool monitors similar event types but also supports deeper monitoring of our strategic suppliers, their parent companies and supply chains. This will continue to be work in progress as we develop our understanding and appropriate use of the information that the tool offers.

5. Due diligence

To strengthen the resilience of our supply chain, we actively monitor external media and use a comprehensive supplier screening service to identify any adverse reports, fines, or sanctions involving our direct suppliers. This process enables us to respond swiftly to potential issues, conducting initial risk assessments and escalating high-risk concerns to the relevant teams for further action.

Following the initial supplier onboarding stage, the screening tools described are used on an ongoing basis to monitor our active supplier base that meets a defined spend threshold. Any alerts that arise during the supplier lifecycle are triaged and reviewed by the Procurement Supply Chain Risk team, using risk assessment criteria that consider the risk event impact against our risk taxonomy, to ensure we appropriately identify and manage associated risks

During FY26, we received a screening alert regarding one of our suppliers. Whilst this was not in relation to any work being conducted on behalf of National Grid, we are investigating this further following public reporting and ongoing legal proceedings in the United States concerning allegations that the supplier may have been involved in financing activities linked to a government accused of serious human rights abuses. The supplier is contesting the allegations and the relevant court decision through appeal, and as a result our enquiries are ongoing.

We also encourage all our employees and those working on our behalf to report any concerns directly to us, and we provide a range of communication channels to support and enable confidential reporting.

During FY26, we received a concern from an employee bringing to our attention a news article reporting the serious allegations of human rights abuses involving migrant workers reported in the context of a large scale construction project in Saudi Arabia, unrelated to work undertaken for National Grid. The article names suppliers who provide services to National Grid, although it does not suggest any wrongdoing on their part, and there are no known investigations by law enforcement or regulators. Given the seriousness of the allegations, we are engaging with the suppliers to understand what actions they have taken to prevent human rights abuses within their operations and supply chains in higher risk geographies.

We will continue to monitor the above matters and consider any relevant learnings to further strengthen our

due diligence, supplier engagement, and risk management approaches.

We continue to strengthen labour and human rights due diligence across our supply chain using EcoVadis, a global sustainability ratings platform widely used across the UK and US to assess companies' sustainability performance across four dimensions: Environment, Labour and Human Rights, Ethics, and Sustainable Procurement. In 2025, we deployed EcoVadis IQ Plus to rapidly identify potential risk hotspots through contactless, AI powered risk mapping across our contracted supply base. Through this process, we risk assessed 2,025 contracted suppliers spanning 156 industries and 26 countries, enabling us to prioritise supplier engagement and focus on areas of highest concern.

This assessment identified six high-risk suppliers across Labour and Human Rights. These risk classifications do not represent confirmed violations but indicate elevated inherent risk requiring enhanced engagement and assurance. Those suppliers are primarily located in China and India supplying a range of products such as transformers and insulators in the UK. We requested each of these suppliers to complete an EcoVadis Light Scan Assessment, a simplified, rapid sustainability screening, designed to provide further assurance on how those suppliers are approaching Labour and Human Rights risks within their value chains. We have initiated targeted engagement with these suppliers and will continue to monitor, challenge, and support improvement actions, recognising that human rights risks may evolve over time and require sustained oversight.

At the time of publishing this Statement, 200 of our contracted suppliers were rated through the EcoVadis platform, achieving an average Labour and Human Rights score of 63.2, 11 points above the global benchmark—demonstrating generally strong maturity across our rated suppliers. Insights from the platform will continue to strengthen our risk-based approach, inform supplier improvement actions, and enhance robustness of our due diligence controls. We are reviewing how we get the most out of this tool going forward.

We are collaborating across the industry and actively engaging with our suppliers to enhance our strategies for identifying and mitigating potential risks of exploitation. Together, we are creating a safer and more ethical environment for everyone involved, ensuring that our collective efforts lead to meaningful change and protection for those at risk.

Marine Assurance Activities

In response to the increased demand in the offshore industry, we have evolved our Human Rights controls and incorporated them into the wider internal Marine Safety, Health, Environment, and Security (SHES) Management System. This is underpinned by a clear commitment to respecting and protecting human rights and preventing all forms of modern slavery across marine operations. This commitment is embedded within governance, leadership, risk management, and assurance processes, ensuring that activities are planned and executed in a manner that upholds ethical labour standards, fair treatment, and worker welfare. Through proportionate risk assessment, contractor and vessel assurance, and supply chain due diligence, the system seeks to identify, prevent, and mitigate human rights risks associated with marine activities. Expectations are communicated through policy, contractual requirements, and oversight arrangements, supported by monitoring, reporting, and escalation mechanisms. Improvement is driven through audit, review, and learning processes to ensure alignment with applicable legislation, recognised international principles, and organisational values.

Continuous oversight of project and vessel operations takes place via regular meetings and daily updates, which are verified through the offshore Client Representative. The vessel and crew are periodically assessed, with closer focus applied depending on safety criticality and risk-based analysis.

Since the introduction of these controls, we have not identified any substantiated human rights concerns through these assurance activities, and we continue to be vigilant. While these activities have not identified substantiated concerns to date, we recognise that the absence of findings does not equate to the absence of risk, and we continue to strengthen oversight and assurance across our marine operations.

Strengthening human rights due diligence in construction

As a part of our human rights commitments, we have agreed to conduct an annual on-site engagement day with the intention of focusing on the following:

Diverse Site Activities: Focusing on sites engaged in a variety of construction and installation activities, such as groundworks and equipment installation, enabling engagement with a diverse workforce from highly skilled professionals to unskilled and casual labour.

Robust Workforce Presence: Prioritising sites with at least 100 workers from a minimum of three different

companies and support these sites to maximise on-site engagement across a broad range of employees.

Site engagement is a crucial component of our strategy. They ensure that on-site teams are well-supported and equipped to effectively identify and manage human rights and modern slavery risks.

This includes:

- **Fair recruitment:** Ensuring workers are hired ethically and not subject to exploitative conditions.
- **Labour providers:** Use of labour providers and subcontractors who do not increase risk exposure.
- **Worker welfare:** Managing work hours, pay conditions, and on-site accommodation.
- **Escalation pathways:** Embedding clear reporting and remediation processes.

Following the initial remote human rights capacity-building engagement completed in FY25 with SFA and a Tier 1 supplier at one of our largest construction sites in Northern New York. We used the learning from the exercise for our first site-based human rights capacity-building and site engagement session at our

. This was conducted in collaboration with Murphy Group and our specialist partners at the SFA utilising their audit approach and protocols. The initiative combined document review, site observation, and discussions with workers and supervisors, reaching more than 45 people across a range of roles and experience levels.

These activities assessed how effectively decent work standards are being implemented on site, identified where further support may be beneficial, and surfaced practical lessons for continuous improvement across future projects, recognising that site-based assessments provide insight at a specific point in time and must be complemented by ongoing, risk-based due diligence. These engagements provide insight at a specific point in time and complement, but do not replace, ongoing vigilance and risk-based due diligence, recognising that human rights risks can evolve over time. We plan to continue doing on-site engagement at various locations each year, including eventually scaling to reach our US operations.

We will be identifying opportunities to leverage the outcome of these activities by sharing the learnings more widely with our key construction suppliers, recognising the elevated risks that can exist in this category of work.

For more information, we have developed a

to

provide further details about this activity.

Remediations

Recognising the potential human rights risks within our supply chain, we have collaborated with SFA to develop our escalation processes and remediation frameworks. These tools enable us and our partners to respond effectively to potential human rights concerns including modern slavery incidents within our operations or supply chains. The resulting Supplier Human Rights Toolkit has been published on our [supplier portal](#), providing information and support for any of our suppliers, whilst understanding the approach we take to manage, remediate, and escalate human rights concerns.

Working together to improve industry standards

At National Grid, we are committed to raising industry standards through collaboration and knowledge exchange. By sharing best practices and learning from peers and experts, we aim to achieve significant improvements across the sector.

We actively engage with various organisations through industry groups to discuss key areas for collaboration and action. Our commitment to continuous improvement is reflected in our ongoing benchmarking research, which allows us to integrate best practices into our approach wherever applicable.

As members of multiple working groups, we are dedicated to driving change on a broader scale. We consistently engage with industry partners to explore effective strategies for addressing the risk of modern slavery. Together, we can create a more responsible and sustainable future, ensuring that our customers can trust in the integrity of our supply chain and the ethical practices that underpin it.

External engagement overview:

Action Sustainability (AS)

The AS peer learning group serves as a shared knowledge platform focused on human rights, enabling members to exchange experiences and strengthen best practices. Its objective is to develop effective human rights frameworks through collaboration and open communication. By encouraging the sharing of insights and strategies, the group supports sustainable change and fosters a culture of continuous learning and improvement across the industry.

United Nations Global Compact (UNGC) Modern Slavery Working Group

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 receiving 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)

We have been actively involved in the SCSS Built Environment Against Slavery Group and were the first client-level signatory to the People Matter Charter, alongside many of our main contractors. We have also contributed to prioritising the key focus areas of the Built Environment Against Slavery Group in line with our business supply chain sustainability strategy. These primary priorities include:

- Developing due diligence maturity guidance.
- Creating a standard approach to supply chain mapping.
- Making existing resources more accessible, including learning pathways and a new search function for the SCSS members to find resources aligned with various aspects of modern slavery due diligence.
- Showcasing strategic approaches to combatting modern slavery to our industry peers.
- Collaborating to drive impact.

We also contributed to the development of the SCSS Practical Guide to Understanding Modern Slavery Risk in Supply Chains, which provides a consistent approach to risk assessment. This guide includes examples of how to apply it to key categories of spend such as:

- Material Categories: steel, Personal Protective Equipment (PPE), wind turbines, batteries, stone.
- Subcontract/Service: ground workers, labour agencies, cleaning services, security, waste.

The guidance covers different approaches for Subject Matter Experts (SMEs), 'New Beginners,' and mature organisations. We continue to promote the use of the SCSS resources and tools both internally and within our supply chain.

Slave-Free Alliance (SFA)

As members of SFA, we benefit from access to valuable tools and resources, as well as an assessment of our modern slavery strategy. As a trusted partner to National Grid, SFA provides practical guidance to ensure our construction sites and supply chains are resilient, compliant, and uphold worker dignity.

Together, we conducted remote and on-site capability site engagement to enhance our understanding of site-level risks and opportunities without disrupting operations. This initiative is part of a three-year action plan aimed at strengthening supplier assessments and improving data utilisation.

Utilities Against Slavery

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

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

We have been actively involved in 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 within our respective supply chains.

The following table describes key human rights related industry conferences we have contributed to during FY26.

Conference	Purpose	Outcomes
Slave-Free Alliance Annual Conference	Bring together policymakers, practitioners, and industry peers for education, networking, and strategic discussions on emerging human rights regulations, due diligence, and governance frameworks.	Proactively engaging with internal stakeholders to manage expectations on the revised CCLA benchmarking methodology and impacts on our score. Benchmarking our human rights key performance indicators against industry and peers' best practices. Leveraging the AI-assisted tool to benchmark our modern slavery statement against our peers and industry.
National Grid, BSI, & King's Business School – Build a Resilient Supply Chain Free of Modern Slavery	Bring together regulators, academics, and industry peers to enhance the practical implementation of human rights due diligence and strengthen supply chain resilience in line with BS25700.	Further aligning our 3-year human rights action plan and modern slavery risk assessment with the guidance provided in BS25700.
UN Global Compact Network UK	Bringing together industry peers to participate in a series of events focusing on Human Rights in Challenging Contexts.	Practical, actionable strategies for managing human rights risks in conflict affected or high-risk environments. Peer-to-peer learning through confidential discussions with other companies facing similar challenges. Improved business resilience including strengthened supply chains and better preparedness for evolving risks.
EcoVadis World Tour: UK & Benelux	Understand the biggest drivers and challenges in the UK when it comes to supply chain risk & resilience, net zero ambitions, and value chain improvement.	Exploring key features such as Workers Voice and Assistant AI to reinforce our supplier engagement programme and due diligence processes in supply chains in alignment with our Ethics procedures.
Ethica 26	One day summit to explore how companies can embed justice into supply chain governance and turn risk into resilience.	The summit focused on human rights in supply chains. Key outcomes included: Embedding Human rights into corporate governance and culture. Building resilience against regulatory pressure and investor expectations. Utilising practical tools for measuring risk. Engaging with survivors and NGOs: • Discussing the financial, legal, and reputational risks of failing to act on human rights.

Monitoring and Continuous Improvement

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

- The new British Standard on Modern Slavery, Organisational Response to Addressing Modern Slavery Risks. Guidance – BS25700, which provides organisations with guidance on managing 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 outlines how UK Government departments must take action to identify and manage modern slavery risks in government supply chains.
- The EU Directive on Corporate Sustainability Due Diligence, which aims to foster sustainable and responsible corporate behaviour and 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 aims to oblige companies to prevent human rights and environmental harms "so far as is reasonably practicable" in their own operations, products and services, those of their subsidiaries, and throughout their value chains.
- The Transparency in Supply Chains (TISC) Statutory guidance, which is the UK Government's guidance for organisations on ensuring that modern slavery is not taking place in their business or supply chains.
- CCLA UK Modern Slavery Benchmark provides a comprehensive framework that assesses how FTSE100 organisations approach and manage the risk of modern slavery in their business and supply chains, focusing on the 'find it, fix it, and prevent it' methodology.



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.

Speak up and Ethics oversight

We champion openness and transparency, offering multiple avenues for all employees and those working on our behalf to raise concerns. Our confidential helplines are available globally, operating 24/7, ensuring that support is always just a call or click away. Details about these helplines can be found on our website, in our Code of Ethics, and our Supplier Code of Conduct.

To reinforce our commitment, we actively promote our Code of Ethics and the supporting 'Speak Up' policy. We provide clear information on how to report a concern, what details to include, and what to expect during the process. We regularly update our supporting materials and continue to explore innovative ways to ensure our 'Speak Up' contact details are easy to access for colleagues and those working across our sites.

We take all allegations of unethical or illegal behaviour seriously. All reported concerns are handled by our dedicated ethics teams and investigated by professional investigators with sensitivity and diligence. Independent investigations are conducted, and appropriate action is taken based on the findings. An overview of allegations and their outcomes is reviewed by the Group Ethics, Risk & Compliance Committee, which comprises senior leaders responsible for overseeing ethical standards and monitoring the effectiveness of our Speak Up programmes.

Each year, we track supporting metrics through our employee engagement survey and provide summaries of these metrics, allegations, and findings to our Business Unit and Function-led Ethics, Risk & Compliance Committees, as well as our Audit & Risk Committee. Regular updates on our ethical programmes, including anti-modern slavery initiatives, are also shared.

We encourage everyone to use our helplines, available 24/7 by phone or weblink, for raising concerns, asking questions, or seeking advice. Our recent employee engagement survey revealed that 83% of our workforce feels confident that National Grid addresses instances of unethical behaviour consistently and effectively. This feedback fuels our commitment to maintaining a culture of integrity and accountability.

Training and awareness

Our induction programme immerses new starters in our company values and Code of Ethics from day one. Our commitment extends beyond initial training; we provide ongoing mandatory training and communications for all employees on essential topics related to our Code. Key elements of our Code are integrated into our Supplier Code of Conduct (SCoC), reflecting our proactive approach to combatting modern slavery.

Our Procurement activities and controls are centrally managed for all National Grid business units, including all subsidiaries listed at the end of this statement. We are dedicated to continuously upskilling our procurement professionals, raising awareness of potential modern slavery risks within our value chain, and empowering them to contribute to prevention efforts. This commitment has led to the development of Sustainability Foundation-Level Training, with additional sessions planned to focus specifically on modern slavery and human rights.

During FY26, we partnered with SFA to create a bespoke webinar for our procurement professionals in the UK and US, which was delivered in March 2026. The session focused on the human rights risks most relevant to National Grid's supply chain, how we use EcoVadis to identify, prevent, and mitigate these risks, the EcoVadis training available, and the ways our procurement professionals can support our Human Rights Policy through their day-to-day work.

To enhance awareness, we have delivered training to key roles within the Safety, Health & Wellbeing, and Environment & Sustainability (SHES) team in the Strategic Infrastructure and Land & Property business areas, providing an overview of modern slavery. We continue to take a risk-based approach to identify further areas across the organisation where we can increase awareness and utilise existing site visit assurance programmes.

We actively encourage our suppliers to take advantage of the free training and resources available through the SCSS. We consistently promote the use of modern slavery learning pathways, resources, and tools available in the SCSS, ensuring that everyone in our supply chain is equipped with the necessary knowledge.

As part of a collaborative working group within the SCSS, utility sector clients are uniting to provide clear direction for addressing modern slavery risks within their value chains. Together, we have created several learning pathways on key topics, including modern slavery, which we have promoted throughout our supply chain. Adoption of these resources can be tracked through our priority supplier dashboard, ensuring accountability and progress.

7. Measuring our effectiveness

We currently monitor several key measures to assess our progress and programme effectiveness. To strengthen our approach, we are collaborating with AS and SFA to review and enhance our KPIs, ensuring they provide meaningful insights and drive impactful actions.

We regularly benchmark our performance against peers with the assistance of an external NGO. Specifically, CCLA (the UK's largest charity fund manager) benchmarks the Modern Slavery Statements of the FTSE 100. In November 2025, CCLA's Modern Slavery Act report placed National Grid in Tier 2 (Evolving Good Practice). Based on our benchmarking, we believe that our statement and programme are consistent with those of our peers, while recognising the need to demonstrate increased-outcome based impact over time.

Measure	Reason for measure	FY22	FY23	FY24	FY25	FY26
Number of potential human rights concerns escalated through our supplier screening process	We continuously monitor adverse media reports within our supplier population, using screening tools to detect these issues. This approach helps identify any modern slavery concerns, allowing us to implement appropriate actions and controls	1	0	0	1	1
Number of modern slavery concerns reported through our confidential helplines	Details of our confidential helplines are available to employees, suppliers, and the public, providing an avenue for reporting any ethical concerns. We continuously monitor all reports and use the information to identify potential control weaknesses and improve our processes.	1	0	0	1	0
Number of related issues reported through alternative channels.	Details of any related issues received outside formal reporting channels.	0	0	1	0	1
Percentage of our top 25 supplier organisations (by spend) with a publicly available Modern Slavery Statement or equivalent policy.	This serves as an additional measure to monitor the actions our suppliers are taking to address the risks of modern slavery in their supply chains.	-	48%	80%	84%	84%

FY24 - This concern was self-reported by First Solar. For more details, please refer to the National Grid Modern Slavery Statement FY24.

FY25 - BYD, a global leader in electric vehicles and battery technology, supplies cars for our UK car leasing programme. Brazilian authorities halted construction of a BYD factory due to workers living in conditions akin to slavery. Although National Grid does not have a direct contractual relationship with BYD, our procurement team requested assurances from BYD regarding their support for the affected workers. BYD has responded to our enquiries, outlining actions taken including the establishment of a compliance committee at the Brazil factory, the delivery of ESG and compliance training, the provision of victim redress, and the completion of due diligence activities across its supplier base, with a particular focus on labour rights and environmental protection.

FY26 - Both reported instances relate to concerns reported where suppliers of National Grid have been named but they do not relate to our supply chain. We are conducting due diligence to understand how the suppliers are responding to these concerns. Our enquiries are ongoing.

8. Focus areas for FY27

We recognise the importance of continuous improvement and remain committed to strengthening our approach to human rights due diligence in our business and supply chains. Over the past year, we have deepened our understanding of the practical challenges and opportunities in managing modern slavery risks through our site engagement activities, adopted new tools to support the identification of related risks and concerns and we continue to understand how we can utilise available data to strengthen and develop our approach.

Our focus for FY27 will be to build on the supplier engagement activities, sharing the learning from our site engagement activities and developing our understanding and further use of the tools we have.

Focus areas

What we will do	Why we will do it	Expected outcomes
Utilise assessment risk tools.	To identify where there is a higher risk of human rights breaches in our supply chains.	Identify and engage with those suppliers to mitigate any known or potential human rights risks.
Enhance our existing KPI's with the support and experience of the SFA.	Test our KPI's, ensuring they are meaningful and drive relevant actions.	Established leading and lagging metrics that support our approach to identifying and managing the risk of potential human rights breaches in our supply chain.
Upskilling our global procurement professionals.	Ensure our procurement professionals all have a level of awareness across broader human rights risks.	Enhanced ability to recognise, report and mitigate potential human rights risks across our global procurement activities.

By maintaining a measured and strategic approach, we ensure that our efforts remain sustainable, collaborative, and aimed at creating long-term impact.

Governance

Our Group Ethics, Risk & Compliance Committee evaluates our approach to modern slavery. They receive annual reports on our performance, provide guidance on future priorities, and review and enhance the actions we take to improve our practices and those of our suppliers.

To learn more or provide feedback on our statement, contact us at:

National Grid plc

1-3 Strand

London

WC2N 5EH

United Kingdom

nationalgrid.com

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

UK

National Grid Holdings One plc
Lattice Group Limited
National Grid Holdings Limited
National Grid Electricity Transmission plc
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.

The above list reflects National Grid plc subsidiaries required to report under section 54 of the Modern Slavery Act 2015 as at 31 March 2026.

National Grid plc
1-3 Strand
London
WC2N 5EH
United Kingdom

nationalgrid.com