

nationalgrid

Our Code of Ethics

>

Bring
Energy
to Life



Our Code of Ethics

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



How to use this interactive document



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Welcome

How to use this document

The Code of Ethics is a publication delivered by the National Grid Group.

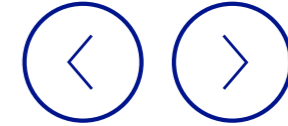
To help you find the information you need quickly and easily we have published this Code of Ethics as an interactive document.

How to utilise the interactive document:



Home

This will take you to the contents page.



Arrows

Click on the arrows to move backwards or forwards a page.

WWW.

Hyperlinks

Hyperlinks are highlighted in light blue throughout. You can click on them to access further information.



Additional navigation

You can also navigate the document by clicking on the sections in the sidebar.

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Welcome to our Code of Ethics

Welcome



Acting responsibly



People and
behaviour



Conflicts of interest



Anti-corruption
and transparency



Information and
communication



Useful contact
numbers



**We have policies
and guidelines to
help us make sure
that we all do the
right thing.**



Welcome to our Code of Ethics

Our Purpose, 'We Bring Energy to Life', combined with our Vision and Values, guide us to serve our customers and look after the communities in which we operate.

Our Vision is to be at the heart of a clean, fair and affordable energy future. This Vision demonstrates our belief that we need to stand for something beyond profit. It also emphasises the importance of trust, which we earn not just by meeting our commitments, but by making sure we do so in the right way. That is why how we work is as important as what we do.

Our Code of Ethics for all National Grid employees outlines how we behave and is shaped by our three Values; Do the Right Thing, Find a Better Way and Make it Happen.

The code applies to everyone, from the Board and the Group Executive to all colleagues across the organisation. It is intended to help protect our reputation as an ethical business and so maintain the trust of everyone that we do business with. The choices and decisions we make every day really matter and we should all feel confident in voicing our opinions and in challenging behaviour which doesn't feel right.

We have policies and guidelines to help us make sure that we all do the right thing. You will also find information about where to get further advice or how to raise a concern. If you see something that isn't right, you should speak up. No matter who is at fault, or the mistake that was made, we should all be prepared to learn from each other.

So, take the time to read and reflect on this guide, and apply its principles to how you do things every day.



J. Pettigrew.

John Pettigrew
Chief Executive

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Welcome



Acting responsibly



People and
behaviour



Conflicts of interest



Anti-corruption
and transparency



Information and
communication



Useful contact
numbers



**Our code is
supported by an
Ethics Business
Management
Standard.**



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Our Values – Do the Right Thing, Find a Better Way and Make it Happen – are fundamental to how we do business. And how we work is equally as important as what we do. Our code supports all of us in making informed and ethical decisions that align with these Values. It gives background information, advice and outlines how to raise a concern or get further guidance. (See page 7 for more information on our Values.)

Our code also reinforces the importance of speaking up, so we can learn from our mistakes and address unethical behaviour. That means being open and honest and speaking up if we see something unsafe, unethical or potentially harmful. We do not tolerate victimisation or retaliation against anyone who raises a concern and consider such acts to be misconduct. Any such acts will be subject to local disciplinary procedures.

The code contains guidance sections that highlight key principles, ethical dilemmas and frequently asked questions (FAQs) to support our understanding, as well as details of what the guidance means to us.

The following areas are covered in our code:

- Acting responsibly
- People and behaviours
- Conflicts of interest
- Anti-corruption and transparency
- Information and communication.

Our code is supported by robust processes for investigating any concerns raised and responding to any related queries. Please refer to the contact information on page 10 for details of the avenues available to you for reporting any ethical concerns or for any further guidance you may need to answer any related questions or queries.

The code applies to all National Grid employees, including those of our subsidiaries. Failure to comply with the code and any associated company policies and procedures will be taken seriously and may result in disciplinary actions up to and including dismissal, in line with local disciplinary procedures.

This document is written in British English, following the common practice for multinational companies to use the language of their corporate base.



Our code also reinforces the importance of speaking up, so we can learn from our mistakes and address unethical behaviour.



Our Purpose, Vision and Values

Our Purpose is simple: to Bring Energy to Life

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Our Vision is what we aim to achieve. To be at the heart of a clean, fair and affordable energy future.

Our Values

To Do the Right Thing, Find a Better Way and Make it Happen

We'll achieve our Vision and deliver our strategy by living our Values – to Do the Right Thing, Find a Better Way and Make it Happen.

Taken together, they will guide our actions and behaviours as a responsible business and help us create the culture we need to tackle the world's greatest energy challenges with passion and purpose.

A culture that is purpose-driven and results-orientated, where our people are empowered to take the lead and make decisions that ensure we deliver efficiently for our customers, communities and stakeholders.

To put our Values into action, we need to look at how we live our behaviours in the work we do every day, in ways that mean something for colleagues across the business. Our code supports this by outlining the behaviours that are expected of us all. Ethical business behaviour depends on all of us accepting our responsibility for living the Values and upholding the principles within this code.

Do the Right Thing

- Stand up for safety every day
- Be inclusive, supporting and caring for each other
- Speak up, challenge and act when something doesn't feel right.

Find a Better Way

- Embrace the power and opportunity of diversity
- Increase efficiency to help with customer affordability
- Work with others to find solutions for customers
- Commit to learning and new ideas.

Make it Happen

- Take personal ownership for delivering results
- Be bold and act with passion and purpose
- Focus on progress over perfection
- Follow the problem through to the end.



Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>

As a National Grid employee

I will comply with the laws, regulations and company requirements that apply to my job.

I will follow the guidelines set out in this code and demonstrate the National Grid Values.

I will not tolerate poor ethical standards in others and will speak up promptly about possible misconduct.

I will treat all colleagues, customers and third parties with respect, fairly and truthfully.

I will cooperate fully with internal and external auditors, lawyers, People and Culture, the Ethics and Business Conduct team and any other people involved in investigations.

I will speak up and promptly report any Ethical or Business Conduct issues that I become aware of.



As a National Grid leader

I will model compliance with this code and other relevant National Grid policies.

I will lead by example, doing the right thing and demonstrating National Grid's leadership skills and Values.

I will listen to and follow up with employees who raise concerns and ensure that any that relate to breaches or potential breaches of our Code of Ethics are reported to the Ethics and Business Conduct teams.

I will build trust and create an environment that makes it comfortable and safe for employees to speak up to share ideas and concerns.

I will make ethics and business conduct an essential part of leadership accountability.

I will cooperate fully with internal and external auditors, lawyers, People and Culture, the Ethics and Business Conduct team and any other people involved in investigations.

I will speak up and promptly report any Ethical or Business Conduct issues that I become aware of.



As a National Grid company

We will conduct our business in line with our Values.

We will promote an environment where everyone can do the right thing and feel comfortable raising any concerns about actions or decisions that they think are unethical.

We will investigate the facts thoroughly and fairly where concerns are raised in good faith and ensure appropriate actions are taken.

We will not tolerate retaliation or victimization of any kind and we will take action against any employee who is found to have victimised a person for raising a concern.



Making the right choices

We have policies and guidelines to help us make sure we all do the right thing. However, they cannot cover every situation we may face. Always take time to think: Do our behaviours reflect our Values? Are we acting in line with our policies?

When we're not certain, we should stop, get advice, involve others where appropriate and be accountable. To help us test any decision we may reach, there are some questions we can ask ourselves to navigate grey areas. See the following page for more details.



Quick test

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>

Is it fair and honest?

(no intention to deceive or mislead)

Is it within the spirit of our Values, policies or Code of Ethics?

Is it in the best interests of the Company?

Does it avoid creating a sense of obligation?

Can I justify it to my manager, co-workers, friends and my family?

Would I feel comfortable reading about it in the press?

Is it lawful?

If we can answer 'yes' to all these questions, we are on the right track. However, if we answer 'no' to any of these questions, we should all seek advice using the avenues available and described in the 'Who should I contact?' section.



Who should I contact?

We all have a responsibility to speak up if we have an ethical query or concern, or if we are made aware of any ethical concerns that we haven't witnessed ourselves. You don't have to have all the facts or evidence available to report a concern, the key requirement is to ensure it is reported. The following options are available to all of us to support the process of raising ethical queries or concerns and includes access to confidential helplines.

Please be aware that if you choose to remain anonymous, the action taken will be limited by the information provided at the time, it is therefore important that as much information as possible is provided at the time of reporting an ethical issue or concern.



<p>Are you comfortable speaking to your line manager?</p>	<p>Yes</p>	<p>Discuss your query or raise your concern with your line manager</p>	
<p>No</p>	<p>Are you comfortable approaching another manager in your team/area?</p>	<p>Yes</p>	<p>Discuss your query or raise your concern with your manager</p>
<p>No</p>	<p>Do you feel comfortable speaking to someone in a supporting function?</p>	<p>Yes</p>	<p>Discuss your query or raise your concern with</p> <ul style="list-style-type: none"> • Ethics and Business Conduct team • Employee Relations. <p>For the US, Telephone 1-888-867-6759</p> <p>Email businessconduct@nationalgrid.com</p> <p>The central Ethics and Business Conduct teams can be contacted either directly or via the following:</p> <p>For the UK, Telephone 0800 328 7212</p> <p>Email business.conducthelp@nationalgrid.com</p> <p>In addition to the above, the central Ethics and Business Conduct teams are supported by a network of Ethics Champions/Liaisons who can help answer your related questions or queries. (This network does not currently extend to UK National Grid Electricity Distribution)</p>
<p>Contact the external helpline where you have an option to remain anonymous (this service is provided by an external third party).</p> <p>For the UK, Telephone 0800 298 6231</p> <p>Email report@seehearspeakup.co.uk</p>	<p>Website seehearspeakup.co.uk/en/file-a-report</p> <p>Username: National Grid, Password NG7614</p> <p>For the US, Telephone 1-800-465-0121</p> <p>Website nationalgrid.ethicspoint.com</p>		

*This service is available 24/7 all year round.

- Welcome >
- Acting responsibly >
- People and behaviour >
- Conflicts of interest >
- Anti-corruption and transparency >
- Information and communication >
- Useful contact numbers >



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Doing the right thing



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Acting responsibly

- 13 Safety
- 14 Environmental protection
- 15 Insider threats
- 17 Physical security
- 19 Community volunteering, investment and sponsorship
- 21 Human rights

Welcome



Acting responsibly



People and
behaviour



Conflicts of interest



Anti-corruption
and transparency



Information and
communication



Useful contact
numbers



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Our activities and those of our contractors can involve risks. We must assess those risks and remove or minimise them by putting in place preventative and protective measures to keep ourselves and the public safe.



Principles

- We all take responsibility for achieving our safety ambition which is to always do the right thing regarding safety and consider the safety impacts in everything we do.
- We take ownership and act safely.
- We commit to openly discussing safety issues and constructively challenging unsafe behaviours.
- We learn from sharing with our colleagues what goes well and what doesn't go well.
- We report all incidents, near misses and good catches.

Dilemma

1 I've worked with the same team for a few years. Recently, one of them has cut corners in following safety procedures. I feel that this has put them and the rest of the team at risk. Other team members have noticed it too, but they haven't told our manager. They say I shouldn't worry about this and that our colleague is just going through a tough time. I don't want an incident to happen, but I also don't want to distance myself from the other team members or get this employee into trouble.

What should I do?

It's good to be loyal to your team, but that loyalty should prompt you to take action. You should constructively challenge the unsafe behaviour and raise your concerns. This could be by having a safety conversation with the individual or discussing it collectively as a team in an appropriate forum/meeting. You should also report your concerns to your manager. There could be many reasons for your colleague's unsafe behaviour, but whatever the reason, it can't continue. Remember that cutting corners and not following safety procedures could lead to an incident and someone could get hurt. Raising concerns enables us to learn from our mistakes and keep ourselves and each other safe.

FAQs

Do I really have to report a minor accident if nobody had to take time off work?

Yes. You must report all incidents, no matter how minor. We look at all incidents – however trivial they may seem – to identify any hazards and trends, so that action can be taken to prevent injuries from occurring.

What this guidance means to you

We strive to be world-class when it comes to safety. It's important that we always work safely and comply with health and safety rules and regulations. You should constructively challenge unsafe behaviours, and you must report all incidents and near misses, so we can investigate them and take appropriate action.

Where you can find more information

Safety BMS Standard
Grid:home

For UK Electricity Distribution employees, please refer to the following:
HS1/6 Health and Safety policy
UK National Grid Electricity Distribution SharePoint site.

Policy section owner

Safety

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



As a responsible business we aim to go beyond legal compliance and seek opportunities to operate in an environmentally sustainable way. We do this by not only avoiding negative environmental impacts, but by leaving the natural environment in an improved state as a result of our actions. We're all responsible for protecting and enhancing the environment.



Principles

- We identify our environmental risks, including climate change, and develop plans to mitigate them.
- We comply with all relevant regulations and requirements, follow our environmental procedures, use permits, plans and other documents when necessary, and seek specialist advice to inform our decisions.
- We protect the environment by ensuring prevention of pollution is a key consideration in the design of all our assets.
- We use resources more efficiently by using sustainable materials and reducing waste.
- We identify opportunities to use alternatives to hazardous materials.
- We seek ways to enhance the natural value of the areas in which we work for the benefit of local communities and the environment.
- We ensure all our employees have the training, skills, knowledge and resources necessary to achieve the requirements of our internal standards.
- We use our environmental management systems, tools, expertise and innovation to measure and improve our performance.
- We report all environmental incidents and near misses, however minor they may seem. We treat environmental incidents as we do safety incidents.
- We seek opportunities to deliver improvements and enhancements as a result of our work.

Dilemma

1 During a recent site visit I found that on-site controls and monitoring records hadn't been inspected, which need to be done as part of our regulatory and environmental permit commitments.

What should I do?

Tell your manager straight away. You may also need to contact the Environmental team, or the Legal department to inform them of the matter. They'll discuss it with you and give advice.

2 When reviewing reports, I routinely print out paper copies.

What should I do?

Consider whether it is necessary to print the reports instead of reviewing the reports on your computer.

FAQs

Do I still have to report an environmental incident if no pollution was caused?

Yes. You must report all environmental incidents, no matter how minor. We investigate all incidents that are reported – however trivial they may seem – to identify hazards, capture any learning and prevent them from happening again.

What this guidance means to you

This guidance helps you understand how environmental policies, procedures and processes apply to your job. Remember that to meet our environmental commitments we must all support the environmental policy in all areas of our work.

Where you can find more information

Environmental Sustainability BMS Standard Grid:home

For UK Electricity Distribution employees, please refer to the following:
UK National Grid Electricity Distribution SharePoint Site

Policy section owner

Safety, Health and Environment

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



If an employee or contractor misuses National Grid information or accesses it to harm our company, this is referred to as an 'Insider Act'. Insider acts can include criminal activities such as theft, fraud, sabotage, terrorism and commercial or state-sponsored espionage. A person from outside National Grid could also pose a threat by exploiting a relationship they have with one of our employees or contractors.



Principles

- We ensure that prior to their start date, background checks for all new employees and contractors are completed to ensure they do not pose an unacceptable risk.
- We remain vigilant at all times in the workplace and adopt the approach of always speaking up: **If you see something, say something.**
- We are mindful of changes in colleagues' attitudes, mindsets and loyalties. These changes can sometimes result in people becoming more likely to use their access to our systems and other assets in ways that could cause us harm. We will report any suspicious or unusual behaviour and deal with security concerns when they arise.
- We look out for our colleagues and offer support as appropriate. We will not jump to conclusions or assume that a change in a colleague's behaviour means that they are doing something wrong. Just talking to them and showing our concern may help.
- Where we have any security concerns, such as those related to changes in behaviour, we raise these with our line manager or contact the Security team by emailing **security@nationalgrid.com**. You can phone UK Security on 01926 653773 and US Security on 844-290-0722. You can also phone the Business Conduct Helpline (UK 0800 328 7212, US 1-888-867-6759).

For UK Electricity Distribution employees please raise security concerns with your line manager or you can phone the Business Conduct Helpline on 0800 328 7212.

Dilemma

1 A usually lively outgoing team member has become withdrawn and seems anxious. They have changed their working pattern and have frequently been observed working unusual hours and are reluctant to take any holiday. I have noticed they have started to regularly take files home with them. Some of the files appear to contain sensitive information about our infrastructure and security measures.

What should I do?

The problem could be they have a heavy workload and are struggling to complete assigned work. Talk to them and find out if they're ok. If you still have concerns after this, or don't feel comfortable with this approach, discuss the situation with your line manager or contact the relevant UK/US Security team.

For UK Electricity Distribution employees please raise security concerns with your line manager or you can phone the Business Conduct Helplines on 0800 328 7212 (internal business hours) or 0800 298 6231 (External 24/7 helpline)

2 I routinely work on new property acquisitions and new National Grid building projects. These projects are generally off-site and remote and there are often new faces coming and going. I noticed there seems to be very few interactions between these individuals and the National Grid personnel on-site. Sometimes they show up, walk around and take notes, and depart without any interaction with National Grid.

What should I do?

These types of projects occur every day at National Grid. In addition to the aggressive pace to acquire, construct, and complete new sites, National Grid employees must work routinely with a wide range of contractors and vendors to ensure projects are completed in a timely manner. Project Managers are aware they must maintain proper security protocols while supervising these remote projects and must ensure all personnel working on National Grid properties are authorised to be there. Should you ever feel that unauthorised personnel are on your job site, please contact the relevant on-site National Grid employee, your manager or the Security team.

For UK Electricity Distribution employees please raise security concerns with your line manager or you can phone the Business Conduct Helplines on 0800 328 7212 (internal business hours) or 0800 298 6231 (External 24/7 helpline)

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



FAQs

What should I do if I don't feel comfortable raising an insider threat concern with the person or my line manager?

You can raise it with the Security team/contact or the Ethics and Business Conduct team using the helpline numbers provided.

What this guidance means to you

The security of our people, and our other assets and information, is vital to us and the national infrastructure. Taking appropriate security measures is an important way in which we can help protect both ourselves and National Grid against people who may cause us harm.

Where you can find more information

Security BMS Standard
Global People Security Policy
Grid:home

For UK Electricity Distribution employees, please refer to the following:
ER30/3 Security screening and vetting policy
SR7/1 Personal Security Risk
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Security

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Having effective and visible security in place helps keep our people and assets safe and secure. Visible security and ALL employee participation in security fundamentals help us guard against criminal activity, such as theft, vandalism, sabotage and terrorism. We are the owner and operator of infrastructure that's critical to the countries we work in and we must ensure all necessary steps are taken to protect it.

The security measures we employ, both people and physical security measures, are proportionate to the level of risk to the Company. We use best practices in each country we work in and comply with all relevant laws and regulations.

Members of our Security team will work with you and, where appropriate, help liaise with other entities/bodies to include local law enforcement.



Principles

Safety of our employees, contractors, visitors and members of the public is our number one priority. To achieve this, we will all:

- challenge anyone who isn't wearing an employee security pass/badge or visitor badge
- report any loss or theft from National Grid to the police and the Security team
- report suspicious activity – if you see something, say something (for UK Electricity Distribution employees, please report this to your line manager or you can contact Ethics and Business Conduct)
- use the security arrangements and controls we have in place (for example, locking gates and doors) or report them if they're not working correctly
- report all security incidents – they may indicate a trend or persistent problem
- protect our sites and people by not revealing any security arrangements or sensitive information to people outside our company, or to those who don't need to know these details as part of their job
- only take photographs or use cameras or recording equipment in secure areas where there is a clear business reason
- ensure that we never follow closely behind someone to avoid security barriers or allow others to do so.

We report any security concerns to: **Security@nationalgrid.com** or by dialling 01926 653773 (UK) or 844-290-0722 (US).

For UK Electricity Distribution employees please raise security concerns with your line manager or you can phone the Business Conduct Helplines on 0800 328 7212 (internal business hours) or 0800 298 6231 (External 24/7 helpline).

Dilemma

1 An individual has tailgated through the door or gate behind me without presenting their pass/badge to the card reader.

What should I do?

Ask the individual to see their pass/badge. If they cannot produce one, escort them to the reception desk. If there isn't a reception and it's an employee, take them to their manager to verify the employee belongs in the building. If it's a visitor, ask who they're there to see and contact the individual to escort their visitor.

2 I'm part of a team making an official National Grid business presentation today in front of numerous people in a public space. I've been noticing increased activist activity in the media from a wide variety of protestors who appear to be focused on energy sector businesses.

How can I ensure my safety while giving this presentation?

National Grid's Security team routinely monitors social media and open sources (print, radio, TV, etc) for indicators and messaging from protesters and activists who might display an unusual or increased interest in National Grid and our employees. Contact the Security team (through contact information listed above) for updates and advice on National Grid locations and events in other locations if you are concerned about you or your colleagues' safety.

3 I'm scheduled to travel to a foreign country and I'm concerned about my safety while away from home.

What does National Grid do for employees scheduled to travel domestically and internationally?

National Grid offers a robust Travel Security Programme through our Security Control Centre (SCC) to assist our employees while travelling abroad. You must book your travel through Concur (US) or Agiito (UK) to ensure you're linked to our employee notification system and we can provide support in an emergency. National Grid's Security team can also provide site specific and geographic security briefings based on your individual needs.

For NG Electricity Distribution employees Key Reservations can be contacted for preferred rates for UK hotel accommodation and external meeting rooms.

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



FAQs

Why should I challenge an unescorted visitor? Isn't that Security's job?

Security is everyone's responsibility. By having every employee look for and challenge unescorted visitors, National Grid becomes a much safer environment for everyone. Good security behaviours deter those who wish to do the organisation harm. In every instance, know that safety is of primary importance. Allowing an unauthorised person to remain in our facilities could result in harm to you, others, or the Company. Contact the Security team immediately if you see suspicious activity.

If you see something, say something.

I have noticed some activity that may compromise our physical security at a location. How do I report it?

If you are at a facility/site with a local security office or an onsite security guard, notify the office or the person as soon as possible. Otherwise, you can contact Security at the numbers on the previous page.

What's the reason for keeping security doors closed, especially to limited access areas? If we're all National Grid employees, why are the extra security measures needed?

Security doors and secure areas are kept closed and secure for various reasons. Leaving the door open increases risk to National Grid and your colleagues. In certain areas, there are regulations in place that designate certain areas as secure areas. Violations of these regulations can result in serious fines and reputational damage to the Company.

What this guidance means to you

Security is everyone's responsibility. Everyone can help keep our people and assets safe. Challenge behaviour that could threaten our security and report any concerns you have to the Security team.

Where you can find more information

Security BMS Standard
Global Physical Security Policy
Global People Security Policy
Regional Access Control Policies
Grid:home

For UK Electricity Distribution employees, please refer to the following:
ER30/3 Security screening and vetting policy
SR7/1 Personal Security Risk
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Security

Community volunteering, investment and sponsorship

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We play a vital role in connecting people to the energy we all use, and we recognise the effect our work can have on people and communities. We're at the heart of communities, so investing in and connecting with them is the way we do business. We also support charitable, civic and community organisations at global, national and local levels because we want to see the communities in which we operate thrive. Our comprehensive volunteering programmes give employees the opportunity to work with a variety of different organisations in the UK and US, and to take part in a range of activities.



Principles

Employees who donate money or raise funds for a registered charity may be able to apply for Matched Giving (UK) or Matching Gift Program (US). (This arrangement does not currently apply to UK National Grid Electricity Distribution employees).

- **UK:** National Grid will match up to £400 per financial year (1 April – 31 March) for funds raised or donated to a registered charity by an employee. There's no minimum donation amount or limit on the number of donations you can make per year, as long as the overall total is within the annual allowance you can receive a match of up to £400. Applications are made via our My Charity Giving page or MyServices portal.
- **US:** the Matching Gift Program matches personal donations of up to \$500 each fiscal year, as long as you donate \$20 or more as a lump sum. Applications are made via the US Giving and Volunteering page.

All requests to contribute to community projects are handled in line with our policy on charitable donations and must meet the "delegations of authority" requirements. No commitments will be made without the appropriate process and authorisation (UK approval via the NGET CGP Panel and US approval through the Economic Development and US Giving team).

- **UK:** All requests from community groups, charities and not-for-profit organisations for community investment/donations must go through the National Grid Community Grant Programme website – nationalgrid.com/responsibility/community/community-grant-programme. Applications must come from charities and community organisations and not from employees.

For UK National Grid Electricity Distribution, all requests must be submitted via the following site – nationalgrid.co.uk/Community-matters-fund

- **US:** Charitable donations are governed by a policy that sets out the process for making, reviewing or approving funding requests.

Dilemma

- 1 Carrying out work in a small community has caused lots of disruption. Representatives from the community have asked us to make a donation towards a new recreational area in the local park. As the overall project has come in under budget, I'm keen to help.

What can I do?

UK: You cannot donate money from the project. You must ask the community to apply for a community grant through our Community Grant Programme. The community can apply online at nationalgrid.com/responsibility/community/community-grant-programme. For UK National Grid Electricity Distribution, the online link for applications is – nationalgrid.co.uk/Community-matters-fund

US: You can agree to the donation only if you have the proper approval to do so. All requests for donations to charities must go through the Economic Development and US Giving team. Community contributions such as this should also be reviewed by local Jurisdiction leadership to make sure they meet our community strategy and priorities.

Community volunteering, investment and sponsorship

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



FAQs

Can I ask for donations from our suppliers, vendors or customers?

Speak to the Ethics and Business Conduct team or the Community Investment team before asking for any donations. In most cases we would advise against this.

How can I find out more?

In the UK, if you have any questions about employee volunteering, community investment, sponsorship or donations, please direct them to gridforgooduk@nationalgrid.com

In the US, you can find out more by reading the US Fundraising section of the Workplace Guidelines, which are available on Grid:home. You can also find guidance on the types of fundraising we allow, as well as how you may advertise a fundraiser and get any approvals you may need. Company policies relating to charitable donations and sponsorships are available on the US Finance SharePoint hub. You can also contact the Corporate Citizenship team on 315 428 6891.

What this guidance means to you

Getting involved with communities is the way we do business at National Grid. There are lots of ways in which you can make a difference – from volunteering your time and skills to fundraising.

Where you can find more information

Responsible Business Policy
Grid:home

For UK Electricity Distribution employees, please refer to the following:
UK National Grid Electricity Distribution SharePoint site

Policy section owner

Corporate Affairs

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status as defined by the United Nations. Respect for human rights is incorporated into our employment practices and our Values.



Principles

- All employees are treated fairly and in a way that safeguards their human rights.
- We believe all employees should be able to work freely and receive fair pay in return.
- We adopt the 'Employer Pays' approach, where no one should have to pay to obtain a job at National Grid or within the supply chain.
- Our supply chains are required to, and we expect them to, adopt the same principles communicated via the Global Supplier Code of Conduct.
- We work with our supply chains to ensure adherence to the principles of the United Nations Global Compact, the Ethical Trading Initiative Base Code, the US Trafficking Victims Protection Act, the UK Modern Slavery Act 2015 and, in the UK, the requirements of the Living Wage Foundation.
- We take responsibility to report and monitor human rights violations and mitigate against any risk in our supply chain.

Dilemma

- 1 I'm working on a National Grid site with a contractor. Some of the contractor's employees seem unseasonably dressed, have incorrect or no safety equipment and appear to be restricted in the way that they are allowed to engage with me.

What should I do?

These three observations may be indicators of forced labour practices. In these situations, we would want you to report this immediately to your manager and the Ethics and Business Conduct team.

FAQs

I travel to the Far East as part of my role where working conditions are very different. Do these rules apply?

Yes. They apply to anyone we employ, and anyone engaged through our supply chain.

What steps does National Grid take to safeguard against modern slavery and human trafficking?

We believe the risk of modern slavery or human trafficking in our business and first tier supply chain is low. 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. Furthermore, our Global Supplier Code of Conduct sets out our expectations and fundamental principles that we expect our suppliers will perform with the highest ethical standards and to comply with all relevant laws, regulations and licences when working for National Grid.

What this guidance means to you

We are committed to maintaining a work environment and supply chain that recognises and upholds the importance of human rights. We are committed to the communities we serve, and support programmes designed to help improve the way people live and work.

Where you can find more information

Modern Slavery Statement
Procurement BMS Standard
HR BMS Standard
Global Supplier Code of Conduct
Global Supplier Diversity Policy
Grid:home

For UK Electricity Distribution employees, please refer to the following:
Global Supplier Code of Conduct
Global Supplier Diversity Policy
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Procurement and People and Culture



People and behaviour

- 23 Drugs and alcohol
- 24 Discrimination, harassment and bullying
- 26 Workplace violence

Welcome



Acting responsibly



**People and
behaviour**



Conflicts of interest



Anti-corruption
and transparency



Information and
communication



Useful contact
numbers



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We are committed to having a workplace free from alcohol and drugs (including psychoactive substances) and any other substance that may affect your ability to safely perform all aspects of your job.

We understand that there will be circumstances where you may be taking controlled and prescribed drugs. In such instances you need to consider whether they could negatively affect your performance at work. To protect your safety and that of your colleagues you should seek advice from your doctor about any potential effects that could impact your ability to perform effectively and/or safely at work. You must tell your supervisor/manager or Occupational Health (UK)/Health and Wellbeing (US) and your HR department.



Principles

- We understand that help and support is available to anyone who voluntarily reports a drug or alcohol dependency and that anybody needing support should contact Occupational Health (UK) or Health and Wellbeing (US) and our Human Resources department.
- We take responsibility and accountability for ensuring we are not under the influence of alcohol or illegal drugs whilst working for the Company.
- We understand that while the controlled use of prescription drugs is allowed, if we feel that at any time they may impact our ability to carry out our role safely then we will inform our supervisor/manager or a member of the Occupational Health (UK)/Health and Wellbeing team (US) to decide if we can do our work safely and effectively.
- We are aware that drug and alcohol tests can be carried out if required by law; before a job offer; after an incident or if there is a good reason to believe that a person's work is affected by their use of alcohol or drugs.

Dilemma

1 I'm taking prescription medication that could affect my ability to work, but I don't want to tell my supervisor because I don't want to reveal my medical condition.

What should I do?

You don't have to tell your supervisor/manager the type of medication you're taking or why you're taking it. If you think that the medication you are taking could affect your performance, you must let your supervisor/manager know. You or your supervisor/manager can then get advice from the Occupational Health (UK) or Health and Wellbeing team (US) to decide if you can do your work safely and efficiently.

FAQs

If I have a drug or alcohol problem, how can National Grid help?

We will support you if you have a genuine problem and want help. Our Employee Assistance Programme (EAP) can also give employees and managers confidential support and advice on a wide range of issues at any time of the day or night, every day of the year.

What this guidance means to you

We aim to maintain a safe, healthy and productive working environment for all employees, customers, contractors and visitors who are involved with our work. We have a duty to ensure our work environment is free from alcohol and drugs and that you never work if you are under the influence of alcohol or drugs.

Where you can find more information

UK/US Drug and Alcohol Policy
Grid:home

For UK Electricity Distribution employees please refer to the following:
ER1/2 Relating to Alcohol and Drug Related Matters
UK National Grid Electricity Distribution SharePoint site

Policy section owner

People and Culture (UK)
People and Culture and Health and Wellbeing team (US)

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We believe in treating everyone fairly and respectfully. We can all contribute to ensuring our workplaces are free from discrimination, harassment and bullying by promoting an environment where we all treat each other as we want to be treated ourselves and in line with our company Values.



Principles

- We will treat others fairly and equally.
- We will not tolerate any type of discrimination, harassment or bullying.
- If we are subjected to discrimination, bullying or harassment, we will report it promptly.
- We will report any behaviours that we witness that could be considered to be discriminatory, harassing or bullying.

Dilemma

1 My colleagues came to me and showed me an inappropriate text message that had been sent to them by another employee and that made them feel uncomfortable and they don't know what to do.

What should I do?

If your colleague is able to, they should raise their concerns with their supervisor/manager. If they don't feel comfortable doing that they should contact People and Culture or the Ethics and Business Conduct team, or call the internal or external helpline. Alternatively, you could offer to raise this on behalf of your colleague.

2 At our team meetings, one of my colleagues will continuously shout at me and dismiss any of my suggestions which makes me feel intimidated and humiliated.

What should I do?

These actions could be considered bullying, you should raise this concern to your supervisor/manager and if you are not comfortable with that, you should contact People and Culture or the Ethics and Business Conduct team or call the internal or external helpline.

FAQs

My manager doesn't include me in team meetings or up and coming events, I think this is because I am due to go on Maternity leave, is this discrimination?

This type of behaviour could be considered discriminatory however there would need to be much greater understanding of the circumstances to know for sure. It's important we resolve your concerns as early as possible and would encourage you to raise this with your manager however if you do not feel able to do so, then you can raise your concern with the relevant People and Culture team or call the Code of Ethics Helpline.

Ultimately, your concerns should be brought to our attention, and you should feel safe to raise them. We will take time to understand your concerns and identify appropriate solutions.

What is discrimination?

Discrimination can take many forms including, but not limited to, race, religion, gender, sexual orientation, age, physical and mental disability, marriage and civil partnership, pregnancy and maternity.

What is harassment?

Harassment can include anything that creates an intimidating, offensive or hostile work environment which can be physical action, spoken or written remarks, and videos or pictures.

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



FAQs

What is sexual harassment?

Sexual harassment includes unwelcome sexual advances, requests for sexual favours and all other verbal or physical conduct of a sexual nature.

What is bullying?

Bullying is any health-harming verbal or physical abuse or mistreatment that threatens, humiliates or intimidates an individual.

Bullying or harassment can be between two individuals or it may involve groups of people, It may be persistent or an isolated incident and can occur in written communications, by phone or through email, not just face to face.

What this guidance means to you

We are committed to maintaining a work environment that respects people's differences. None of us should tolerate harassment, bullying or discrimination of any kind.

Where you can find more information

UK/US Discrimination, Bullying and Harassment policies
Grid:home

For UK Electricity Distribution employees please refer to the following:
ER8/3 Bullying and Harassment
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

People and Culture

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>

We believe in providing a safe work environment for our employees. Anything that threatens the safety of the workplace or any person is not allowed. This includes threats or violence against other employees, customers or property. It also includes any other type of behaviour that puts, or could put, the safety of anyone at risk. We have a zero tolerance for any form of workplace violence, threats of violence, intimidation or attempts to instill fear in employees, consultants, vendors, customers or contractors.



Principles

- If we witness or are subjected to any acts of violence or threatening behaviour in the workplace you will report it.
- We understand that we are not allowed to carry weapons or other dangerous objects and substances while working for or representing National Grid.
- Our personal safety and that of our colleagues is of paramount importance and we will remove ourselves from any situations that threatens to jeopardize that.

Dilemma

- 1 I witnessed an altercation between two employees in which one employee pushed the other employee.

What should I do?

You should Immediately notify your supervisor/manager and Security.

- 2 Whilst attending a customer's premises, I was verbally threatened by the customer and felt very concerned that the situation was going to escalate.

What should I do?

We do not tolerate any of our employees being verbally or physically threatened, in these circumstances we would advise you to safely remove yourself from the situation. If it is not safe to leave the work that you are there to do, you should call your supervisor for support or even the police depending on the severity of the situation.

FAQs

What is workplace violence?

Workplace violence is any verbal or physical conduct that is violent, threatens violence, intimidates, attempts to instil fear, degrades or shows hostility towards an individual.

What this guidance means to you

We are committed to maintaining a work environment that is free from violence.

Where you can find more information

US Workplace Violence Policy
Grid:home

For UK Electricity Distribution employees please refer to the following:
ER27/1 Unacceptable customer behaviour policy
UK National Grid Electricity Distribution SharePoint site

Policy section owner

People and Culture



Conflicts of interest

- 28 Conflicts of interest
- 30 Relationships with third parties
- 32 Price-sensitive information, insider trading
and material non-public information

Welcome



Acting responsibly



People and
behaviour



Conflicts of interest



Anti-corruption
and transparency



Information and
communication



Useful contact
numbers



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We will avoid situations where our personal interests could conflict or may be perceived to conflict with those of National Grid. A conflict of interest arises when our personal relationships, interests or activities affect or could potentially affect our ability to perform our work or make unbiased decisions on behalf of National Grid. Involvement in public duties outside of work is encouraged, but only if there is no conflict of interest, or the appearance of one.



Principles

We will inform our manager, People and Culture or the Ethics team:

- as soon as we become aware of any potential conflicts of interest that may occur
- if we or a family member holds a financial interest in a company that does business with us
- of any personal relationships in the workplace
- we understand that we should not directly manage anyone with whom we have a personal relationship
- we understand that we should not take on more than one external directorship in a major publicly limited company or other significant appointment.

We will ensure that our financial, employment or other interests, or those of our family or friends, will not affect (or appear to affect) the decisions we make.

Outside directorships, second jobs and other outside activities

- We will obtain prior written approval from our manager or supervisor before committing to an outside directorship, second job or other outside activities and understand that approval will only be given if the work or directorship doesn't:
 - cause a real or apparent conflict of interest
 - affect our obligations under any relevant laws
 - affect our ability to do our job, or conflict with our responsibilities as a National Grid employee

- involve our use of company time, equipment or other resources
- negatively affect our ability to meet the terms and conditions set out in our contract of employment (UK only).

Outside activities include voluntary or paid public office or community positions such as school governorships or parish council work.

Personal relationships

- A “personal relationship” is defined as any relationship between employees that could be considered a consensual “romantic” relationship, any relationship in which employees cohabit, and/or any relationship with a relative. A relative is any person who is related by blood or marriage, or whose relationship with an employee is similar to that of a person who is related by blood or marriage.
- We will promptly inform our line manager if we are involved in a personal relationship in the workplace. In addition, any employee who is the manager of others and who becomes aware of any such personal relationship must immediately report it to People and Culture.

We understand that the Company reserves the right to take remedial action in any situations involving individuals in a personal relationship including transfer decisions, or any other remedial action it believes is appropriate to address any actual or perceived issue or conflict.

Conflicts of Interest Declaration

- All employees have an obligation to disclose any actual or potential conflicts of interest when first joining the company and then annually by the completing the Conflicts of Interest Declaration form. When completing our declaration, we will err on the side of disclosure and amend it whenever something changes during the year. When declaring any external directorships, you will be asked to provide details of time commitment and monetary benefit.

Dilemma

- 1 My brother-in-law is a part owner of a business that is bidding on a contract to provide pipe to National Grid. I have been asked to get involved in the bid evaluation process.

What should I do?

This situation could be perceived as an actual conflict of interest and should be disclosed to your manager immediately. It's likely that you will not be permitted to get involved (now or in the future) in any decisions related to your brother-in-law's business. This relationship should also be disclosed on your Certificate of Compliance and Disclosure.

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



2 I have a seat on the local planning board for the area where I live. National Grid has a construction project and will be applying for a variation from the local planning board.

What should I do?

Since the variation will need to be approved by the authority board, you need to remove yourself from all involvement in the National Grid matter to avoid a conflict of interest.

3 Earlier this year I became romantically involved with my co-worker which I declared via the Conflict of Interest Declaration process. At the time we were both at the same management grade. Due to the success of my projects, I was recently promoted to a higher grade with my partner reporting up to me.

What should I do?

You should immediately contact People and Culture or Ethics and Business Conduct who will take steps to ensure that your companion is not in your reporting line, avoiding any conflicts of interest.

FAQs

What if one of my relatives or a close friend works for one of National Grid's suppliers?

You should disclose this to your manager and report it via the routine Conflicts of Interest Declaration process.

I was recently elected to public office. Will this create any conflicts of interest with my job at National Grid?

As per the guidance, you should have already gained approval from your manager before standing for election. If this hasn't happened, you should tell your manager about the commitment and make sure that:

- it doesn't conflict with your working hours at National Grid;
- you don't use company resources for your duties in public office; and
- you don't use your position to look for favours for National Grid or to grant any favours.

When carrying out your public office role, if any discussions arise pertaining to National Grid, you must remove yourself and not provide any opinions as they could be construed as the opinion of National Grid, the Company, rather than your own opinion.

What this guidance means to you

As an employee you will report any personal, financial, employment or other instances that could create a possible conflict of interest between you and National Grid and our personal relationships.

Where you can find more information

US Personal Relationships Policy
Conflict of Interest Declaration Process
Grid:home

For UK Electricity Distribution employees please refer to the following:
ER35 Personal Relationships in the Workplace
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

**CRO (Chief Risk Officer) Office/
People and Culture**

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Our relationships with vendors/suppliers are particularly vulnerable to real and apparent conflicts of interest, so we all need to be extra vigilant and exercise caution in our day to day business with them. Suppliers, contractors and business partners of National Grid are held to the same standards of conduct as National Grid employees. This is described in the National Grid Global Supplier Code of Conduct.



Principles

- When we are managing supplier contracts or overseeing contractors, we will ensure we understand the terms of the contracts and the obligations of our role in contractor oversight where appropriate.
- We will not purchase goods or use the services of any contractor or supplier retained by National Grid for private purposes, except under the normal terms and conditions of that contractor or supplier (or under special arrangements negotiated by National Grid for the benefit of all employees).
- When we buy goods or services on behalf of National Grid, we will disclose in writing to our manager, any personal interests or associations that might appear to impair or conflict with our ability to make objective procurement decisions.

- We will comply with the Procurement BMS Standard and procurement policies that relate to identifying potential suppliers, bids, negotiations, contracts or sole source justifications, managing orders and contractors, and payment of invoices. If we are involved in procurement tender events, we will keep all bidding information confidential.
- When asked to provide references for third parties we will ensure any information provided complies with our Third-party supplier reference policy, and does not create any actual or perceived conflicts of interest.

Dilemma

- 1 A close friend owns a business that is bidding on a contract to provide services to National Grid. If they win the bid they would be providing services to my department and I would be able to work with them each day. I would like to work with my friend and I also want them to succeed in their business. They asked me if I could obtain copies of bids submitted by other businesses bidding on the same contract.

What should I do?

You should tell your manager about your relationship and the request your friend has made. Do not provide your friend, or any outside party, with information that would give them an unfair advantage when bidding on a contract.

- 2 A contractor that I work with has confided in me that they feel they are being harassed and bullied by a National Grid employee.

What should I do?

Let them know that they can get in touch through any of the means National Grid has in place, including the confidential 'speak up' line, to report concerns or offer to report this on their behalf. Their concern will be investigated thoroughly and promptly. The Company takes all concerns brought to its attention seriously.

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



FAQs

I have been made aware that one of our contractors is undertaking an activity that is potentially unlawful.

What should I do?

You should immediately notify your manager and the Ethics and Business Conduct team about the contractor's activity. Our vendors and contractors are important business partners who must be held to the same standards of conduct, because our reputation is at stake.

What this guidance means to you

We need to hold all third parties including our vendors/suppliers and contractors to the same ethical standards as our employees. If you are responsible for third party oversight you should recognise the additional responsibilities that are expected of you. You should realise the importance of our relationships with suppliers, customers and other third parties, as well as how these relationships are areas where real or perceived conflicts could arise. You need to be extra vigilant and make sure you adhere to the relevant procurement policies.

Where you can find more information

Procurement BMS Standard
Supplier Code of Conduct
Grid:home
Third party supplier reference policy

For UK Electricity Distribution employees please refer to the following:
Supplier Code of Conduct
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

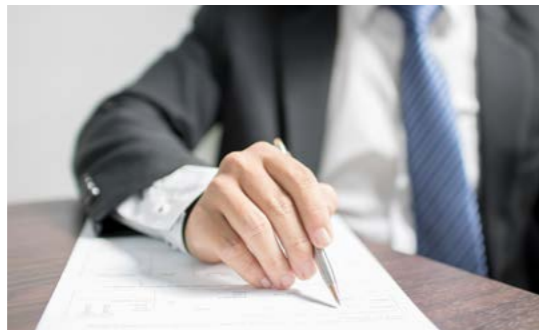
Procurement



Price-sensitive information, insider trading and material non-public information

Information is 'price-sensitive' when it's precise; not yet public knowledge; relates directly or indirectly to National Grid or its shares and securities; and, if it's disclosed, might lead to a significant movement (up or down) in the price of shares or other securities such as National Grid retail bonds. It includes information that would have a substantial likelihood of affecting a reasonable investor's decision to buy, sell or hold National Grid's shares or other securities.

We have a policy in place to manage the disclosure of price-sensitive information. Also, it's a legal requirement that if you have access to price-sensitive information you must be named on a specific list that National Grid is required to maintain. This is called an Insider List and means you will be considered to be an insider.



Principles

- We understand that it is **illegal** to unlawfully disclose price-sensitive information; this means if we require access to price-sensitive information in order to carry out our job, we will keep that information confidential. Also, we will not share the information with anyone else except where we are required to do so by law or as part of our employment.
- We understand that if we have access to price-sensitive information, we will be considered an insider and therefore must not deal in National Grid shares and securities without obtaining prior clearance in accordance with the company's Share Dealing Rules.
- We understand that if we are granted clearance to deal and use price-sensitive information to influence our share dealing, this is called 'insider dealing', **which is illegal**. Insider dealing isn't limited to financial information and can apply to information about the activities and future prospects of any other company listed on the stock market. This applies whether we are doing this in person or through an intermediary. We may also be responsible if we pass price-sensitive information on to a third party, who then uses it to buy or sell shares.

- We understand that we cannot use price-sensitive information to influence our share dealing and we must not recommend or induce anybody else to engage in insider dealing, as this is also **illegal**.
- We will only share price-sensitive information where required to do so by law or as part of our employment.
- Where we think we may have access to price-sensitive information and have not been informed that we are classified as an insider or where we require more information on the company's Share Dealing Rules, we will contact **insiders@nationalgrid.com** immediately.

Dilemma

- 1 Recently I overheard two employees talking about the possibility of National Grid buying another company. I checked the market listings and found out the other company's share price is down because they haven't been performing well. If National Grid announces its plans to buy this company, the value of that company's stock will increase. I realise I can't invest in this company because I work for National Grid. However, my parents just sold their home and have a large sum of money they are looking to invest.

Can I tell them that National Grid is thinking about buying this company and/or recommend that they make an investment?

No. It's illegal to pass on price-sensitive information to others, even if you don't make any investments yourself. The laws on insider dealing contain severe civil and criminal penalties. You should never use price-sensitive information to make, or encourage others to make, investments in National Grid shares or other securities. This also applies to investments in other companies National Grid might be planning to buy or merge with.

Price-sensitive information, insider trading and material non-public information

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

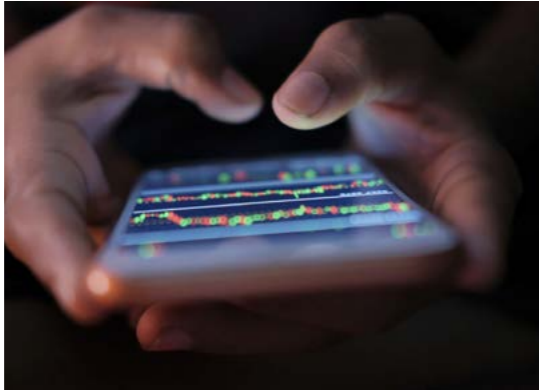
>

Information and communication

>

Useful contact numbers

>



FAQs

What is 'price-sensitive information'?

Price-sensitive information is positive or negative information that is precise, not available to the general public, relates directly or indirectly to specific shares or other securities of a company and could influence a reasonable investor to buy, sell or hold shares or other securities.

The term 'price-sensitive' applies to information about securities of any company listed on the stock market. In the UK it's also known as 'inside information' and in the US it's referred to as 'material non-public information'.

What are examples of potentially price-sensitive information?

- Exceptional events or facts in the annual or half-yearly financial results.
- Major business developments (such as substantial projects or regulatory developments).
- Dividend announcements.
- Major deals to buy or sell a business.
- Significant changes in our financial condition or business performance.
- Significant changes in expectations of our performance.
- People being appointed to, or leaving, our Board of Directors.
- Significant share dealings by directors.
- Major contracts awarded.
- Significant potential legal action.

What this guidance means to you

Never deal using price-sensitive information because that's insider dealing, **which is illegal**.

Be aware at all times – never disclose price-sensitive information to a third party because this could lead to insider dealing.

Where you can find more information

Company Share Dealing Rules
Grid:home

For UK Electricity Distribution employees please refer to the following:
UK National Grid Electricity Distribution SharePoint site

Policy section owner

Legal



Anti-corruption and transparency

- 35 Fraud, bribery and corruption
- 36 Gifts and hospitality
- 38 Business travel and expenses
- 39 Use of company resources
- 40 Political interactions and lobbying
- 42 Competition



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We are committed to preventing, deterring and detecting fraud, bribery and all other corrupt business practices. To protect our organisation, we have a compliance programme to detect and prevent fraud, bribery, financial crimes, money laundering or other corrupt business practices that can seriously damage our reputation, as well as cost us money.



Principles

- We are all responsible for controlling the risks of fraud, bribery, financial crimes, money laundering and corruption.
- We all take individual responsibility for ensuring that we never participate or engage in fraudulent activity, offer/accept bribes or engage in other corrupt business practices.
- We expect employees, suppliers and agents to comply with the laws that prohibit bribery and corruption, wherever we work in the world.
- We understand that theft is a fraudulent activity and will not participate in theft of any kind, including theft of time, money and company resources.
- We will never falsify company records or misreport company information.

Dilemma

- 1 Following completion of a restoration by National Grid after a storm, a customer approaches me with a gift with a value of £50/\$100 to thank me for my work.

What should I do?

In the first instance, we would recommend that you thank the customer for the kind offer but refuse the gift and advise your manager of this situation. If you wish, you could advise the customer that National Grid has in place recognition schemes for our employees and, if they wish, these details can be shared. If you feel that your personal safety may be compromised, you should take the gift and report it immediately to your manager and the Ethics and Business Conduct team.

FAQs

What is fraud?

Fraud is a crime. It's a deception that's designed to benefit someone or cause a loss to someone else.

What is bribery?

Bribery is when anything of value is given in return for influencing the way someone performs their duty. It could include a duty to carry out a public office (such as a policeman or official who approves permits), a commercial duty (such as an employee who should act in the best interest of their employer) or some other legal duty.

Bribery doesn't have to involve an actual payment changing hands. In fact, it can take many forms, including: a gift; lavish treatment during a business trip; property; an offer of employment; or tickets to an event.

Examples include:

Bribing an agent acting for a landowner in order to get permission to build on the land; bribing a foreign official to make sure goods get through customs; and bribing a health and safety inspector so they turn a blind eye to problems.

Other corrupt business practices

Money laundering is transforming the proceeds of crime into legitimate money or assets.

Criminal facilitation of tax evasion is when someone providing a service for or on behalf of National Grid criminally facilitates tax evasion and National Grid did not have procedures in place to prevent it.

What this guidance means to you

You must keep to the highest standards of honesty, integrity and ethics at all times when working for us.

Every employee is responsible for controlling the risks of fraud, bribery and corruption.

If you know about, or suspect, any illegal activity, you must report it to the Ethics and Business Conduct team, regardless of who is responsible. You should never look the other way.

Where you can find more information

Anti-Financial Crimes Policy
Grid:home

For UK Electricity Distribution employees please refer to the following:
LE7_1 Bribery Policy
LE15 Prevention of facilitation of tax evasion policy
UK National Grid Electricity Distribution SharePoint site

Policy section owner

CRO (Chief Risk Officer) Office

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>

We do business and have relationships with many people, such as suppliers, vendors and customers. Sometimes they (or we) might offer meals, hospitality and business entertainment. There may also be certain circumstances where we receive gifts from, or offer them to, people outside National Grid. All of this may seem harmless, but it can create a real or perceived obligation, potentially leaving us vulnerable to accusations of unfairness, bias, deceit or even bribery. Our personal or business reputation may be put at risk. Therefore, we have this guidance and controls in place to protect ourselves as employees and the interests of our company.



Principles

- We will not let our decisions be influenced – or appear to be influenced – by gifts or hospitality that our suppliers, vendors, customers or others may offer.
- We will not try to influence – or appear to be trying to influence – others by offering gifts or hospitality.
- We will consider the following important question before offering or accepting gifts or hospitality – is it serving a legitimate business purpose?
- We will not offer or accept gifts or hospitality from a vendor or supplier that is involved in a current tender/request for proposal (RFP) event in which we are taking part, and we will let our manager know if we do receive an invitation or gift.
- For transparency purposes, we will record all gifts and hospitality that we have accepted or offered, regardless of value, in the Gifts and Hospitality system (currently hosted via a SharePoint site). For UK National Grid Electricity Distribution employees, the email authorizing the gift or hospitality will need to be forwarded the following email address: **Box.ngedgiftsandhospitality@nationalgrid.com**. We understand that the guidance on gifts and hospitality also extends to our family members and to hospitality that is accepted and attended in our own time, outside of normal working hours.

Gifts

- We understand that gifts are discouraged, although we may, in certain circumstances, accept or give gifts as part of a business relationship.

- Gifts with a value of less than £30/\$40 can be offered and accepted. However, prior supervisor/manager approval is needed, and we must log a record of the gift in the Gifts and Hospitality system.
- We will not offer or accept gifts worth more than £30/\$40.
- Irrespective of the value, we will not accept gifts of cash or cash value, such as gift cards, or gift certificates, of any value.
- If we receive a gift that does not meet these rules, we will tell our supervisor or manager, make every effort to return it and keep a record of the actions taken.

In exceptional circumstances (for example, when visiting a country where gift-giving may be customary and expected), we may offer a gift worth more than £30/\$40. However, in these circumstances we will need prior written approval from the Group General Counsel and Company Secretary.

Meals, entertainment and hospitality

If the entertainment or hospitality we are offering or receiving serves a legitimate business purpose, then we need to follow this guidance:

- We will obtain prior permission from our supervisor/manager and a Band A leader SVP or NSM/Director (for UK Electricity Distribution employees) within our directorate or jurisdiction for hospitality with a value over £100/\$100 and less than £500/\$1000 per person.
- We understand that hospitality with a value over £500/\$1000 per person is generally considered to be extravagant and is discouraged. However, in some circumstances it may be allowed, but will require prior written permission from a

- member of the Executive Committee or Director (For UK Electricity Distribution Employees) as well as the approvals listed above. For UK Electricity Distribution employees, you will require permission from your line manager before accepting or offering gifts or hospitality. All managers must consider the business benefit and value before approving any Gifts or hospitality.
- We will be mindful if hospitality, entertainment or gifts are being offered regularly by one person or organisation. At a minimum this could be viewed as an attempt to influence business decisions, or perhaps it is an actual attempt to influence our decision making. In such situations we understand that we need to decline the offer and raise this issue with our supervisor/manager.
- We will not accept or offer benefits in return for influence or a specific decision.
- We will not accept or offer an invitation to offensive or inappropriate entertainment.
- In the US, we will not provide gifts, hospitality, meals or entertainment of any value to any public official or public employee, such activities could be viewed as bribes.
- A 'public official' means anyone carrying out a public function, including but not limited to customs official, police officer, council inspector, state employee, fire department official or judge.
- We understand that our role or the business area that we work in may have greater restrictions around gifts and hospitality.

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



Dilemma – Gifts

1 Recently I attended a conference where there were more than 2,000 attendees. My name was drawn from a raffle and I won an iPad.

Can I keep it?

Yes. It was a widely attended event and everyone had an equal chance to win the prize, so you can keep it. However, you should notify your supervisor/manager for transparency.

Dilemma – Hospitality

2 One of our suppliers has invited me to a major tennis tournament (such as the US Open or Wimbledon).

Can I accept the invitation?

If you and your supervisor/manager are satisfied that by attending you're serving a legitimate business purpose, you'll need to consider the value of the entertainment offered. If it's more than £100/\$100 – which is likely for a major tennis tournament – you'll need approval in advance from your manager and your Band A leader, SVP or NSM/Director (for UK Electricity Distribution employees). If it's the final of the tournament, the value of the hospitality may well be more than £500/\$1,000. So, you would need prior written approval from a member of the Executive Committee.

Dilemma – Meals

3 After an association conference, a group of us go out to dinner together. One person in our party offers to pay the tab for everyone. I'm not sure who he is or what company he represents, but I know some of our suppliers were attending the event.

What should I do?

Whenever you are in doubt, or you do not have time to obtain prior approval, you should politely decline the offer and pay for your own meal.

FAQs

Gifts – I received a gift that is worth more than £30/\$40, could I donate it to charity?

If you've done everything reasonably possible to return the gift, but are not successful, you can donate the gift to charity.

You should get approval for the donation and record the details on the Gifts and Hospitality system.

If you are worried that giving the gift back might cause offence, you should tell your manager and contact the Ethics and Business Conduct team for guidance.

A large holiday gift basket of fruit and other perishables was shipped to me from a vendor, what should I do?

Since it's a perishable item and difficult to return, you can share the basket with the rest of the department. This reduces the per person value below our nominal gift value. Be sure to record it in the Gift and Hospitality system.

A colleague gave me a gift during the holiday season. Is it okay to keep it?

Yes. Our gift policies only apply to vendors, suppliers and customers.

Can I accept alcohol as a gift?

Yes. As long as it keeps to the rules described above and you do not drink it during working hours while working for or on behalf of us, or while on National Grid premises.

Hospitality – My partner and children have been invited to an event. Can they go?

Partners and children may attend events, but the event must serve a legitimate business purpose. If you're not attending the event yourself, or your host will not be there, it's unlikely that there will be any legitimate business purpose and therefore your partner and children should decline.

What this guidance means to you

You should not allow gifts or hospitality to influence your business decisions or personal judgement, or appear to do so.

You should keep an accurate log, using the Gifts and Hospitality system, of all gifts and hospitality you provide and receive, demonstrating transparency around your business relationships.

For UK Electricity Distribution employees, you should retain email confirmation that any Gifts or Hospitality offered or accepted was authorised at the appropriate level and send a copy to **Box.ngedgiftsandhospitality@nationalgrid.com**.

If you have any concerns or need more guidance, speak to your manager or contact the Ethics and Business Conduct team.

Where you can find more information

Grid:home

For UK Electricity Distribution employees please refer to the following:
UK National Grid Electricity Distribution SharePoint site

Policy section owner

CRO (Chief Risk Officer) Office

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We have policies and guidelines for incurring reimbursable business-related expenses on behalf of the Company. Our policies are designed to enable adequate controls to minimise costs ensuring accuracy of cost allocations and legitimacy of all business expenses claimed. The Company will reimburse ordinary, allowable and reasonable expenses you incur on behalf of the Company when you: properly submit claims for these expenses, comply with prudent business practice and exercise prudent business judgement.



Principles

- We all take responsibility for the legitimacy of expenses that we claim, and the adequacy and authenticity of supporting documents that we submit, including but not limited to any required receipts.
- We will submit expenses in a timely manner.
- We will familiarise ourselves with the regional expenses and business travel policies, relevant cost allocation guidelines, supporting systems and reimbursement procedures.
- If we are an approving manager, we will apply due diligence by making sure all claims are accurate, prudent and reasonable business expenses that have been incurred wholly and exclusively for legitimate business purposes and have proper back-up documentation.
- We will obtain management approval for all categories of business travel and expenses before incurring them, where practical.
- We will book all travel via the company appointed service provider.
- We understand that where expenses incurred are for more than one individual, e.g. a team event, the most senior person present will submit the expense.

Dilemma

1 I'm a manager and have taken my team out for a group dinner in recognition of a recently completed project.

Who should pay and claim reimbursement?

If you are the most senior employee in attendance you should be the one paying and claiming reimbursement. Additionally, you should include the names of all employees in attendance on the receipt.

FAQs

If I'm travelling and staying with friends or family instead of using a hotel, am I entitled to any additional compensation?

No. We only reimburse employees for costs they incur on behalf of the business.

Tipping and gratuities are customary and, in some cases, required when dining or in other circumstances. Can I claim gratuities as a reimbursable expense?

Yes. You should include gratuities as part of the total cost of service you're requesting reimbursement for. You do not need to claim them separately. We just ask that you please be prudent when providing gratuities.

What this guidance means to you

National Grid is committed to giving you clear and consistent guidelines for incurring reimbursable business-related expenses on behalf of the Company.

Be familiar with policies, guidelines and processes related to reimbursable business and travel expenses as well as the different types of acceptable expense categories.

Where you can find more information

UK Business Travel and Expense Policy
US Business Travel and Expense Policy
Grid:home

For UK Electricity Distribution employees please refer to the following:
EBA section 10 Business expenses
UK National Grid Electricity Distribution SharePoint site

Policy section owner

People and Culture

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>

The company assets you rely on for your work (for example, computers and phones) are intended to be used for our business. Where appropriate, we have provided you with the things you need to do your job, such as a computer/laptop or a mobile device such as a phone/tablet.



Principles

- We understand that we can use our mobile device for limited occasional personal use, but this must not interfere with our work or the work of others, breach IT policies, break any laws, or incur significant cost to the Company.
- We understand that using company vehicles (cars, vans and aircraft) for personal use is not allowed unless it's specifically authorised (for example, company cars that are provided for private and company use).
- We understand that company property and resources such as facilities, equipment and information are provided for business purposes only and therefore not allowed for personal use.
- We take responsibility for the security of the company equipment we use.
- We will comply with National Grid's security controls when traveling with company equipment.
- We understand that we cannot use National Grid equipment or property for any gambling activities.

Dilemma

- 1 A couple of my colleagues have been using a company excavator or backhoe to do some work on their personal property.

What should I do?

Using company resources for personal purposes is not allowed. You should raise your concern to your line manager or speak to the Ethics and Business Conduct team.

The unauthorised use of company equipment is considered theft which is fraud.

- 2 One of my colleagues is using their company computer to run an accounting side business.

Is this acceptable?

No. Company computers/laptops cannot be used to conduct a personal side business.

FAQs

Can I connect my personal mobile device to the company WiFi during my working day?

Yes. As long as it doesn't interfere with your work or use excessive bandwidth.

Can I use mailing supplies to post some important personal papers?

No. Use of postage stamps, franking and postal supplies such as envelopes is not allowed. You may place personal mail in the outgoing mail tray as long as you use your own postal supplies and have already paid the postage.

Is gambling allowed on company property and/or using company resources?

No. Gambling or gambling activities are not allowed on National Grid property.

What this guidance means to you

We're all responsible for protecting our resources and making sure they're used appropriately.

Where you can find more information

Security BMS Standard
Acceptable Use of Devices Policy
Grid:home
Global working from abroad policy

For UK Electricity Distribution employees please refer to the following:
Disciplinary rules
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

CRO (Chief Risk Officer) Office / IT



- Welcome >
- Acting responsibly >
- People and behaviour >
- Conflicts of interest >
- Anti-corruption and transparency** >
- Information and communication >
- Useful contact numbers >

With so much of our work in the public eye, it's only natural that we'll come into contact with politicians and government officials. While it's important for us to build and develop good relationships, it's even more important that we manage them appropriately. Lobbying laws are very complex and carry severe penalties if you break them, they can vary across states and local governments.



Principles

- We will always be open and transparent in our dealings with government officials.
- We will not offer or accept money or gifts to or from politicians, government officials or regulators.
- We will comply with the regional laws and regulations that apply to interactions with elected/public officials and regulators.

US guidance

A public official or public employee is anyone who is on the payroll of a municipality, city, state, town, county or federal government.

Interactions with public officials are not limited to the Corporate Affairs Team. If whilst working for National Grid, you find yourself in a situation where you're working with a public official or public employee, you must not provide gifts or entertainment to that person. This policy applies to any interactions with public officials or public employees in any setting, on or off National Grid property and applies in all jurisdictions we work in. Always let the US Governmental Affairs team know of any interactions you have with government officials.

UK guidance

Always let the UK and EU Public Affairs team know at publicaffairs&policy@nationalgrid.com (for UK Electricity Distribution this would be the division corporate/external affairs lead) when you're meeting or working with any of the following on our behalf:

- a politician;

- a member of a Westminster government department (such as the Department for Business, Energy and Industrial Strategy or Her Majesty's Treasury) or devolved government department (see below guidance on Scottish Government);
- a non-governmental organisation (such as the Committee on Climate Change); or
- an interest group (such as Greenpeace or Green Alliance).

When you're working with politicians, government officials or regulators, it's important that you keep your own political interests or activities separate from your role as a National Grid employee.

You should also comply with the Association of Professional Political Consultants (APPC) code, the Bribery Act and the Political Parties, Elections and Referendum Act.

Scottish Lobbying Act 2016

Introduced a new public register for "Regulated Lobbying" in Scotland. From March 2018, all employees of National Grid are required to record any face to face engagement in lobbying conversations with Members of the Scottish Government and Parliament (a Member of the Scottish Parliament (MSP); a Member of the Scottish Government (Cabinet Secretary, Junior Minister or Law Officer); the Scottish Government's Permanent Secretary and a Scottish Government Special Adviser) and when discussing Scottish Government or Parliamentary functions. There are financial penalties for failure to comply with the Act.

EU guidance

We're registered on the EU Transparency Register, which regulates relationships between stakeholders and EU officials. You must respect the related code of conduct when dealing with EU officials and follow our rules on gifts and hospitality.

Ask the UK Corporate Affairs team for advice on national regulations that may apply in the EU.

Dilemma

1 In the UK, I've invited two well-known Members of Parliament (MPs) to speak at an event that my team is hosting in the UK. They've accepted the invitation but have asked for a small payment in return for attending. We think their contribution will be really useful for us.

What should I do?

While the MPs' contribution may be valuable, you must not give them money under any circumstances. As an alternative, your team could make a token donation to an independent registered charity as a gesture of thanks for them attending.

2 I'm a US engineer, specialising in gas pipeline safety. Two minor changes to an outdated pipeline regulation would improve customer safety and simplify our compliance process. I would like to invite a regulator to lunch to propose these changes.

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



What should I do?

You should contact the Corporate Affairs team to obtain guidance on acceptable protocols before the meeting takes place. Providing gifts, hospitality or anything of value to regulators is not permitted in the US.

FAQs

In the US, I'm holding an all-day meeting with the Public Service Commission to review our proposed new rate plan. Am I allowed to provide food and drinks for those attending?

You must not offer any gifts or hospitality to a public official in the US. This includes food and drink.

What should I do if a Member of Parliament (MP) in the UK only agrees to attend a meeting or function if we pay for their travel and accommodation?

You can offer expenses, but only if they're reasonable. This would include situations where MPs have to travel from their usual location to attend a meeting, or where they would have to stay overnight to attend a meeting or function.

What this guidance means to you

Working with politicians and government officials is an important part of the work we do. You will be open and honest in any dealings with politicians and public and government officials. You will follow all regional requirements related to interactions with government/public officials and seek guidance from Corporate Affairs or Legal in advance. For UK Electricity Distribution employees this would be the Head of External Affairs.

Where you can find more information

Grid:home

For UK Electricity Distribution employees please refer to the following:
UK National Grid Electricity Distribution SharePoint site

Policy section owner

Corporate Affairs

- Welcome >
- Acting responsibly >
- People and behaviour >
- Conflicts of interest >
- Anti-corruption and transparency** >
- Information and communication >
- Useful contact numbers >

Competition is generally recognised as a good thing for consumers as it helps keep prices for goods and services down. Competition may naturally occur, for example between supermarkets. Where it doesn't, regulation may be needed to ensure businesses that have limited, or no, competitors still behave in a fair manner.



Principles

- We will always seek legal advice before entering into arrangements that might be viewed as anti-competitive (including sharing confidential or commercially sensitive information).
- We will always act fairly and not place anyone at an unfair commercial advantage or disadvantage, including affiliated entities.
- We will be objective, fair and non-discriminatory in all our dealings with potential customers and suppliers.
- We will keep relevant documented evidence of our decisions and interactions with customers, suppliers and competitors and ensure all communications are written clearly, professionally and responsibly.
- We are all responsible for ensuring resources are not cross subsidised.
- We understand that an informal understanding or agreement that may affect competition will be treated by the competition authorities in the same way as a formal legal agreement.

Dilemma

1 I am bidding to win work through a competitive tender process. I haven't had explicit discussions with any competitors or other sources, but I am generally aware of the types of prices our competitors may bid for such work.

What should I do?

Make sure you consider your prices on a standalone basis, rather than based solely on what your competitors may bid. As a minimum, you should aim to recover all your costs, and ideally make a reasonable profit.

General market intelligence can be useful, but it cannot be obtained through inappropriate means such as:

- directly from competitors;
- discussing competitors' prices with customers; or
- from other parts of the National Grid business that may use a competitor as a supplier.

If you have any queries or concerns about discussions relating to competitors or how you price your bids, please contact the Legal team.

FAQs

What should I do if I'm worried that I might have broken, or be about to break, competition law?

Contact the Legal team, who will be able to advise you.

What takes priority, competition law or the licences?

Neither – both apply where relevant, although Ofgem is required to consider using its competition powers, where appropriate, before using its regulatory powers. Competition law applies to all our activities, not just our regulated businesses.

What this guidance means to you

This guidance will help you make sure we act fairly and don't give anyone an unfair commercial advantage or disadvantage. You should never agree to 'fix' any market and you must be seen to be acting in a non-discriminatory way at all times. Always record the reasons behind your decisions. This will help you demonstrate that what you are doing isn't breaking the rules.

Where you can find more information

Grid:home

For UK Electricity Distribution employees please refer to the following:
ER21/8 Fair Competition
UK National Grid Electricity Distribution SharePoint site

Policy section owner

Group Legal



Information and communication

- 44 Data privacy
- 46 Electronic communications
- 47 Information security
- 49 Managing records
- 50 Social media

Welcome



Acting responsibly



People and
behaviour



Conflicts of interest



Anti-corruption
and transparency



**Information and
communication**



Useful contact
numbers



Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



We're committed to protecting people's privacy rights by making sure we handle their personal information responsibly.

We must make sure personal information is protected and processed fairly and in line with the law to maintain the confidence and trust of our employees, customers, vendors, suppliers and regulators.

Each country we work in has its own privacy and data protection laws. These laws focus on the importance of handling personal information in a responsible way. This also includes making sure that there are adequate controls in place to continue to protect the information when it's transferred across borders or to third parties.

As a responsible organisation, we're fully committed to adhering to these laws. We're all responsible for taking great care to deal with personal information in a safe and secure way, and to reduce the risk of it being lost, misused, inappropriately accessed, released, altered or destroyed.

Principles

- We will ensure we understand the data privacy policies and procedures.
- We will be clear on the purpose for which the personal information is being used.
- We will ensure we understand what consent is required before we collect, use or disclose any personal information.
- We will only collect personal information in accordance with National Grid's Data Privacy Policy and relevant data privacy legislation.
- We will only retain personal information for as long as required by law or regulations and thereafter appropriately dispose of such information.
- Where we have personal information, we will provide individuals with access to their personal information in accordance with established regulations.
- We will only disclose personal information to third parties in accordance with National Grid's Data Privacy Policy and relevant regulations.
- We will protect personal information against unauthorised access.
- We will maintain accurate, complete and relevant personal information for the purposes identified.
- We will comply with privacy policies and procedures and follow procedures to address privacy related incidents, complaints and disputes.

Dilemma

1 I realise that I have sent personal information inadvertently to an individual or individuals who do not have a business reason to see the information.

What should I do?

If you have inadvertently sent personal information to someone who has no business reason to receive it, you must report it immediately to your line manager and the cyber response helpline.

Privacy and data protection laws are designed to protect private information and how it is collected, stored, accessed, used and passed on.

FAQs

What is 'personal data'?

Personal data is any information that relates to an identifiable 'natural person', or 'data subject', who can be identified directly from the data itself, or indirectly when that data is combined with other data available to the business. Examples of personal data would be the name of the person, a photograph, an email address, bank details, posts on a social media website or a computer IP address.

What counts as 'personal information' and 'sensitive personal information'?

Personal information relates to living people who could be identified from that information, either by itself or when combined with other information available to the organisation. It can be factual, such as a person's name, address, contact details, or date of birth. It can also be an opinion, such as how a manager thinks you performed at an interview or an appraisal.

There are certain categories of information which need to be treated more carefully due to the harm that could result from their loss or unauthorised disclosure. For example – a person's social security or medical insurance number, details from their driver's licence or passport, employment details such as sickness, absence and disciplinary action, financial details such as debit or credit card details, racial or ethnic background, political opinions, religious beliefs, trade union membership, health, sexuality, alleged crimes and court proceedings.

Who can I share personal identifiable information ('PII') with?

PII must be processed lawfully, fairly and in a transparent manner. On that basis it can be shared with others if to do so would meet the lawful basis for processing. It is important to note PII must only be shared with others if it is relevant and necessary to do so in order to meet the purposes for processing, for example a manager or team members.

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



Can I use personal data for other purposes if I anonymise it?

Yes, if the data is appropriately anonymised. However, you must ensure the data is rendered anonymous in such a way that the data subject is no longer identifiable. Since the process of anonymisation is a form of processing of that personal data, you should also consider your legitimate interest for doing so in the first place (for example, is this personal data for statistical or research purposes) and whether this use should be included in the relevant privacy notice.

Can I share individual performance metrics on team performance (Pex) hubs?

Managers have a legitimate reason to produce reports for improving individual and team performance; however, individual performance metrics are classified confidential and are only available to the individual and any managers involved in the performance and employee reward processes. Any team performance data used should be aggregated.

Team capability matrixes may be used to demonstrate which skills team members possess but should not be benchmarked against an employee's expected objectives or aspirations.

We do appreciate that there are multiple variations of performance reports used around National Grid where, with deeper analysis, individual performance may be inferred. If there is any reasonable doubt about a specific report, please contact a member of Global Information Records Management team (GIRM) for advice. For UK Electricity Distribution employees please contact ngedlegal@nationalgrid.co.uk

What this guidance means to you

This guidance is to help you make sure that we all process personal information in a safe, secure, fair and lawful way.

Where you can find more information

Data Privacy Policy
Grid:home

For UK Electricity Distribution employees please refer to the following:
Data Protection Policy POL LE5/5
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Global Information Records Management

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>

Electronic communication, which includes email, Internet and apps, brings many benefits to businesses. It can reach many people, over great distances, almost instantly. However, it also brings a number of risks and potential problems. When it comes to electronic communications, be cautious. You should always be aware that they have the potential to damage our company or people. For example, they may carry computer viruses that can infect our systems, be from an untrustworthy source, or they may be misinterpreted and cause offence. They could also affect our reputation and electronic messages may need to be disclosed in court proceedings or investigations.



Principles

- We will take responsibility for how we use our company email, Internet access and applications and will do so in line with National Grid policies and procedures.
- We will not use company equipment to:
 - download or pass on material that is dangerous, offensive or illegal
 - conduct any illegal activities
 - send or solicit messages that are political, religious or activist
 - violate any licence agreement, copyright or trademark law
 - impersonate anyone online or maliciously change any messages
 - produce, introduce or forward chain letters or personal video clips
 - send unsolicited junk messages
 - send inappropriate/libellous content.
- We will comply with National Grid's security controls when accessing our communication systems or internet facilities, or when traveling with company equipment.

Personal use

We understand that limited personal use is allowed, but that use must not:

- interfere or create conflict with our work;
- take priority over our work;
- give rise to any risk, liability, potential loss or expense for the Company; or
- have any negative effect on the Company (refer to Social Media section for further details).

Dilemma

1 I have received an email that I wasn't expecting that includes an attachment.

What should I do?

If in any doubt about the validity of the email you have received, you must not open any links contained within the email and should report these to Security via cyberresponse@nationalgrid.com either directly or via the Report Phish button. For UK Electricity Distribution employees, you should report any suspicious emails via the Report as Phishing button on your system

FAQs

Can I use the Internet for personal use during my breaks?

Yes. As long as it is limited and used in line with the requirements detailed above under personal use.

Can I use my work email to enter a non-work related competition?

No. It could make you or our system vulnerable to a security incident.

What this guidance means to you

We allow you to use your email and the Internet for limited personal reasons, and within the law, as long as it doesn't affect your work or expose you or the network to risk.

Be aware of social engineers. These are people who pretend to be someone they are not so they can gain information about yourself or National Grid.

Where you can find more information

Global Acceptable Use of Devices Policy
IT BMS Standard
Security BMS Standard
Grid:home

For UK Electricity Distribution employees please refer to the following:
IT Security Policy IT1/1
UK National Grid Electricity Distribution SharePoint site

Policy section owner

IT



Information security

We're all responsible for protecting information from deliberate, accidental or unauthorised access, and from being altered, destroyed or disclosed. This applies to information held electronically (soft copy), on paper (hard copy), or in our minds (have knowledge of).

Sharing information and ideas within National Grid is great for our business and allows us to make the most of information technology. But there are risks.

If our confidential information falls into the wrong hands, it could be used to damage our (and our partners') reputation and business operations. The same applies to confidential information we have about our business partners or suppliers.



Principles

- We understand the data classifications and classify information we create and handle.
- We will only share information with those that are entitled to receive it.
- We store and dispose of information in line with our relevant policies.
- We will protect our access to information by having strong passwords/passphrases, being careful where we have confidential conversations, and keeping our workspace clean.
- We will keep passwords/passphrases confidential and will not share details of these with anyone.
- We will only access data/information that we are entitled to use to fulfil our role.

Dilemma

1 I know I'm not supposed to share my log-in ID and password/passphrase, but we really need to get this work done while I'm on holiday.

What should I do?

You cannot share your log-in ID or password/passphrase. The reason you must never share your log-in ID and password/passphrase is simple – if you do this, you're effectively allowing someone else to 'be you' on our systems, and that's not acceptable under any circumstances.

You are expected to act responsibly whenever you log on to our systems. If you reveal your log-in details to someone else, you're breaking that trust.

If you know there is going to be a problem, contact the IT help desk as soon as possible and explain the situation. They will then start working on a secure solution for you. You can also utilise the new O365 collaboration tools to share documents securely.

FAQs

What do we mean by 'information'?

Information covers all forms of written, printed, verbal and electronic material. It includes information that:

- you talk about or hear in meetings;
- originates from informal discussions or conversations;
- is saved on storage media (for example, disk, memory stick or hard drive);
- is held on a computer/mobile device;
- is being sent over communications lines including Instant messages, Skype chat, Teams chat, WhatsApp, iPhone texts, Yammer etc;
- is held in digital, graphic, text, voice or image format; and
- is held in an electronic form on your personal devices.

Am I allowed to access O365 (including MS Teams and Outlook) on my personal device?

Yes, as long as you are connected to a secure network.

What is multifactor authentication?

Multifactor authentication (MFA) is necessary to keep us safe and secure from malicious individuals and is something we should do even if we do not remotely access our Office 365 account. MFA verification will put an extra step in for individuals to complete before they can gain access. For more information please go to the IT Portal or call the IT helpdesk. For UK Electricity Distribution employees please use your IT helpdesk.

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



What this guidance means to you

We're all responsible for protecting information.

You should always be on your guard because the content of some emails, faxes (some fax machines and printers have a memory store), text messages, voicemail messages and other recorded conversations could cause significant problems if they're not protected and an unauthorised person has access to them.

Where you can find more information

IT BMS Standard
Security BMS Standard
Data Privacy Policy
Information Records Retention Policy
Data Management BMS Standard
Grid:home

For UK Electricity Distribution employees please refer to the following:
IT Security Policy IT1/1
Records Retention Policy LE10_3
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Information Technology

Managing records

Our business, regulators, auditors and shareholders rely on accurate company accounts and other records. We have to create and maintain complete, accurate and timely records.

We must keep our information and records safe, and make sure no-one has unauthorised access to them. They need to be kept in line with our policies on document storage.

We're all responsible for protecting National Grid's assets, including information and records in all media (hard copy, digital, video, audio, etc.). Records must be stored safely while being accessible to those who need them throughout their lifecycle.



Principles

We are all responsible for:

- entering complete and accurate information in any company account, expense statement, purchase order or other record
- ensuring all records are sufficient in content, context and structure to reconstruct the relevant activities and transactions they document, complete and unaltered
- securely maintaining records (both electronic and hard copy) for their appropriate record retention and disposing of them in accordance with our Records Management Policies
- providing true and accurate records when legitimately requested
- keeping all related company information when we become aware of impending legal action or where we have been issued a 'legal hold' order because of legal action
- saving whatever is required under a legal or contractual obligation, internal control or best practices. If you're not sure what to save, ask the legal department.

Dilemma

- 1 I have records both in electronic and hard copy format, and I am not sure how I should proceed?

What should I do?

Don't dispose/delete them unless you've verified that there are no legal, regulatory or business reasons to retain the records. Refer to the Global Information and Records Management (GIRM) Policy and the appropriate US or UK Retention Schedule.

For UK Electricity Distribution employees, please refer to Document retention policy LE10/3.

Digitising records is recommended to save space and make it easy to access documents regularly referenced, provided required standards for classification, indexing and secure record storage are followed. Depending on the record category, records may be destroyed or sent to Global Information and Records Management for vital records protection/business continuity purposes. Record Centre storage services are available as follows:

- UK** – Warrington Record Centre (not applicable to UK Electricity Distribution)
- US** – Iron Mountain (for upstate New York and New England) and Hicksville, New York Record Center (for downstate New York).

FAQs

What is a record?

A record is information created, received and maintained as evidence and information by an organisation or person, in relation to legal obligations or in the transaction of business.

What is a legal hold?

An order issued by an organisation's legal counsel that prohibits destruction of specified records, because such records are or may be relevant to litigation or government investigation.

Who is the Records Coordinator for my department?

Please refer to the Grid:home where you can

find information relating to the Records Coordinators by department.

How do I know what records need to be kept, how long to keep the records and in what format?

Retention schedules are available on the Grid:home.

What this guidance means to you

Accurate records are critical, so you should make sure that all company records, information and communications are complete, fair, accurate, easy to understand and produced in a timely manner. You should make sure they're stored securely and that they can be retrieved when they're needed.

Where you can find more information

Data Management BMS Standard
IT Content and Collaboration Services
Guideline
Grid:home

For guidance on converting hard copy records to digital format, please contact Global Information Records Management.

For UK Electricity Distribution employees please refer to the following:
Document Retention Policy LE10/3
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Global Information Records Management

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication

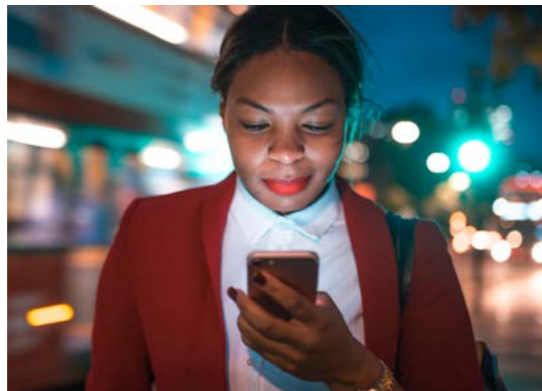


Useful contact numbers



People are talking about us through social media services and sites – such as Twitter, Facebook, YouTube, Instagram and LinkedIn – and it's important that we listen to what they say and respond in a timely manner. Through these channels we can join online conversations about National Grid. This will help us to understand the needs of our customers and the communities we serve.

A conversation that takes place online can be just as important as a letter or email. Remember that conversations on social media may need to be disclosed in court proceedings or investigations. There is also a risk that we may be hacked or targeted as individuals, or as a company, by those wishing to do us harm.



Principles

- We will only comment on behalf of National Grid on social media posts and contribute to social media conversations when they relate to both our role and expertise and we are authorised to do so.
- We only speak on behalf of National Grid, respond to customer queries or company crises on social media where we are authorised to do so.
- When using social media, we will do so in a manner consistent with National Grid's Values and policies.
- We will not impersonate another person or organisation or use a social media handle/username we are not authorised to use, including mentions of National Grid, use of the National Grid logo, energy lines or other brand elements.
- We will not post major Company news, such as information in a press release, before it is released and posted on National Grid's official social media channels.
- We never disclose confidential corporate information, proprietary information or intellectual property (of National Grid or of a third party) when using social media or post discriminatory, harassing, offensive, bullying, abusive, threatening or defamatory comments regarding National Grid employees or any person.
- We only use the National Grid brand in any social media handles/usernames/profile images where we are authorised to do so.

- We will report any social media concerns to the Group Social Media and Content team via **box.UK.socialmedia@nationalgrid.com**. We will report US-only issues to the US Social Media Team via **socialmedia@nationalgrid.com**. For UK Electricity Distribution employees, please report any concerns to the NGED Social Media team. Where appropriate, we will report issues directly to Security, the Business Conduct helplines or Ethics and Business Conduct.
- We will not use our official National Grid email address or any other National Grid details when participating in social media or online (with the exception of LinkedIn) unless we are official brand ambassadors.
- We are careful if we are in a role that makes us an attractive target for a social engineer/criminal, for example, in one of our control rooms, at a critical site, or in Procurement, Finance, HR or Security, although any role may become a target to an innovative adversary. If we hold UK National Security Vetting or US Government Security Clearance, we don't mention it online.
- We are careful about sharing details of business (or any) travel and we do not post photos of colleagues without obtaining permission. We do not share photos/videos of security controls such as security passes, security cameras at site or IT equipment.

Dilemma

- 1 Some of my colleagues are using Facebook to make derogatory comments about people on their team, both inside and outside working hours.

What should I do?

This is unacceptable. You should tell your line manager, People and Culture or a member of the Ethics and Business Conduct team.

Welcome

>

Acting responsibly

>

People and behaviour

>

Conflicts of interest

>

Anti-corruption and transparency

>

Information and communication

>

Useful contact numbers

>



FAQs

A couple of journalists contacted me after I placed a post on Twitter. Can I talk to them?

No. You must not talk to journalists on the Company's behalf, if they phone you or approach you on a social media site. Comments you make could be used to damage our reputation. Take the journalists' details and pass them on to the Media Relations team.

What if a National Grid customer asks me a question via social media?

You should seek advice from the Social Media team before responding via social media unless your role permits you to do so.

What this guidance means to you

Remember that anything posted on the Internet is likely to be permanent, even if you delete it – the information could have been copied and reposted.

You're accountable for anything that you post on social media platforms.

Where you can find more information

Social Media Policy
Security BMS Standard
Global Acceptable use of Devices Policy
Grid:home

For UK Electricity Distribution employees please refer to the following:
CC1_2 Use of Social Media
UK National Grid Electricity Distribution
SharePoint site

Policy section owner

Corporate Affairs

Welcome

>

Acting responsibly

>

People and
behaviour

>

Conflicts of interest

>

Anti-corruption
and transparency

>

Information and
communication

>

**Useful contact
numbers**

>

UK

Internal/Business Conduct Helpline

Freephone: **0800 328 7212**

Email: **business.conducthelp@nationalgrid.com**

External/Focus Helpline

(24 hours a day, seven days a week)

Freephone: **0800 298 6231**

Email: **report@seehearspeakup.co.uk**

Employee Assistance Helpline

Freephone: **0800 279 6155**

Employee Assistance Helpline

(UK Electricity Distribution employees only)

Freephone: **0800 072 7072**

US

Internal/Toll-Free Helpline

1-888-867-6759

Email: **businessconduct@nationalgrid.com**

External/Alertline

(24 hours a day, seven days a week)

Toll-Free: **1-800-465-0121**

Web: **http://nationalgrid.ethicspoint.com**

Employee Assistance Helpline

Toll-Free: **1-800 833 8707**

