



Modern Slavery and Human Trafficking Statement 2026/27

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General Introduction

In this statement, we outline the ongoing work to embed Modern Slavery risk assessment and due diligence across our business and supply chain in a tailored and proportionate way.

Our organisation comprises three National Gas businesses and Premtech Limited:

- National Gas Transmission plc (National Gas) owns and operates the high-pressure national gas network (the National Transmission System) that transports gas reliably to wherever it is needed in Britain.
- National Gas Metering Limited (National Gas Metering) manages and maintains millions of traditional gas meters throughout Great Britain.
- National Gas Services (part of National Gas Transmission plc) provides nationally important emergency and planned pipeline repair and maintenance services to ensure the gas keeps flowing across the UK.
- Premtech provides multi-disciplinary engineering design services for high-pressure onshore pipelines and associated infrastructure.

Due to the way in our business is structured, this statement covers **National Gas** and **National Gas Metering**.

Our Modern Slavery and Human Trafficking Commitment

As Britain's National Gas Network, our organisation and our people are part of the very fabric of our country – keeping the lights on, industries powered and homes warm. That's why we take our Modern Slavery and Human Trafficking obligations very seriously.

Reflecting our commitment to continued due diligence and improvement, our Modern Slavery and Human Trafficking obligations are overseen directly by our Board of Directors and Executive Committee.

By ensuring visible, proactive leadership on this critically important responsibility, our people are clear in their understanding of our obligations and motivated in the part they have to play.

We are proud of the progress we have made and the steps we have taken. However, we will always be committed to further improvement, and we know there is always more to do.

Chapter 1: About National Gas

National Gas Transmission (National Gas)

National Gas is the owner and operator of Britain's National Gas Network.

We transport gas across Great Britain through nearly 5,000 miles of pipes to enable power stations, businesses and millions of homes to access the energy they need.

We are responsible for transporting gas to more than 30 power stations, major industries, storage facilities, interconnectors supplying the island of Ireland and connecting with continental Europe, and to the Gas Distribution Networks (GDNs) that take gas into more than half a million businesses and around 24 million homes.

Gas is an essential part of a secure energy supply in Britain and will continue to play a vital role for decades to come. More than ever, we need the security that gas brings to keep the lights on, businesses running, and homes warm. National Gas provides that security.

Together with the other partners in our Group, National Gas Services, National Gas Metering and Premtech, we are proud to lead the way in transforming the energy network for a clean energy future. Gas provides the energy security to support renewable electricity generation, and we are developing our infrastructure to transport hydrogen and carbon dioxide across the country.

Our business is overseen by an economic regulator, the Office of Gas and Electricity Markets (Ofgem), which regulates us to ensure our interests are aligned with those of consumers.

National Gas Services

Our National Gas Services business is the UK's leading specialist provider of planned and emergency gas pipeline inspection, repair, maintenance and replacement services. Our network of depots provides a rapid response to gas pipeline emergencies anywhere in the UK.

National Gas Metering

National Gas Metering is one of the largest traditional meter equipment managers in Great Britain, enabling power stations, businesses and millions of homes to access the energy they need safely and reliably.

We manage approximately 5 million diverse and, in some cases, significantly complex gas metering installations, delivering consistently high performance and outstanding levels of customer satisfaction.

To support the transition to a net zero future, we are applying our skills and expertise to develop the essential hydrogen metering and infrastructure of tomorrow.

For the purposes of this document, the term 'National Gas' refers to both National Gas Transmission and National Gas Metering.

Our progress

In National Gas Transmission's inaugural statement, we said we would:	This is what we have delivered since the last statement, against the commitments made:
Ensure that standalone processes, policies, and procedures are in place to build upon National Gas Transmission processes and allow us to build the foundation of our Modern Slavery Statement.	We continue to review and update all policies as part of our annual review cycle, including our Supplier Code of Conduct, strengthening our approach to identifying and managing Modern Slavery risks. We continue to demonstrate our commitment to ethical and responsible business practices through our Real Living Wage accreditation and ongoing participation in the Supply Chain Sustainability School (SCSS) and Achilles Utilities Vendor Database.
Embed and test the controls for National Gas.	Background checking controls are now embedded and maintained, with regular audits in place to monitor, evaluate and track compliance. The introduction of the Head of Supply Chain Risk and Assurance role has strengthened the risk assessment and assurance framework, providing clear ownership, increased oversight and a more structured approach to control testing and continuous improvement. Our Purchase Order Terms, which include the required Human Rights legislation clauses, have been embedded.
Implement a structured process for including modern slavery checks into existing site visits, assessments, and contract management practices.	We have continued to deliver Modern Slavery training and engagement through our partnership with the SCSS, while embedding our modern slavery assurance programme. We have developed a structured assurance process to conduct Modern Slavery assurance checks on the top 20 suppliers – including annual supplier declaration, strengthening due diligence and providing more targeted risk-based oversight.

Chapter 2: Governance and Risk Management

Our Modern Slavery prevention activities are overseen by the Executive Committee and our Board of Directors annually review and approve the commitments contained within our Modern Slavery statement. Our overarching approach to risk as an organisation is detailed within our [annual report and accounts](#) however our key assurance processes relating to Modern Slavery specifically are outlined below.

We have embedded a sustainability assessment tool to consider potential risks at the initial stages of sourcing activity, embedding human rights considerations into our strategic sourcing process alongside other sustainability criteria. The tool maps to the UVDB's (Utilities Vendor Database) question set and requires a positive response against key questions. Most of the questions are mandatory at the pre-qualification stage of our sourcing process.

Modern Slavery considerations are also embedded into end-to-end procurement processes, including pre-qualification, sourcing, contracting and supplier management. If a supplier is either unwilling or unable to provide the relevant evidence, we retain the ability to initiate a formal process to review the contract and allocation of any future work for the period of the agreement.

We will be introducing a Supplier Code of Conduct assurance process, providing a continuous, risk-based cycle of supplier engagement, declaration, assessment and audit. All high-risk suppliers are required to complete annual Supplier Code of Conduct declarations confirming:

- Ongoing compliance with labour and human rights requirements;
- Disclosure of any modern slavery risks, incidents or breaches;
- Alignment with National Gas standards across their own supply chains.

The assessment of suppliers as higher risk is determined by factors such as geography, sector (particularly where low-skilled or low-paid labour is prevalent), nature of services (e.g. subcontracting or labour-intensive activities).

A programme of targeted Supplier Code of Conduct desktop audits is also planned, initially focusing on our top 20 suppliers, with a phased rollout across the wider supplier base. Our assurance activity will include audit testing of modern slavery controls, including labour standards, subcontracting practices and supply chain transparency. Where gaps are identified, suppliers will be required to implement corrective action plans which are tracked through to completion to ensure sustained compliance.

To date, we have not identified any confirmed instances of Modern Slavery within our supply chain through our assurance activities. However, we take a risk-based approach and continue to strengthen due diligence, monitoring and supplier engagement processes to ensure early identification and mitigation where risks may arise through assurance activities.

Chapter 3: Our People

We recognise the value of our people and employ a diverse workforce consisting of c.2,500 direct employees (as of 31 March 2026). Within National Gas, we operate policies and procedures to ensure the highest standards of ethical conduct. Equality and fairness are very important to us. As a responsible business, we pride ourselves on treating all employees fairly, ensuring they are provided with a respectful, safe and inclusive environment.

c.2,500 employees	40 years is the average age of our (direct) employees
28% of our direct workforce are female	20% of our direct workforce are from 'minority' racial or ethnic heritage

Our recruitment processes are designed to ensure equal opportunities, compliance with legislation and that all our people have the appropriate right to work in the UK. We use employment agency partners for attracting temporary workers, who are contracted to uphold the same standards of employment that we offer our direct employees.

Where we procure resource from external sources, Contract Managers actively manage our employment agency partners to ensure that they are meeting our employment requirements, including carrying out any relevant screening, including right to work checks, paying the Real Living Wage and adopting the “employer pays” principle. This means that no employee of National Gas should ever have to pay to obtain access to temporary or permanent work within our organisation or supply chain. We have strengthened this area by implementing a preferred supplier list to ensure that all agencies who may source permanent labour for us are signed up to our terms and conditions and expectations of action to ensure that they meet our employment requirements.

We carefully monitor this area and believe that the policies and processes we have in place mean that the risk of forced or trafficked labour being employed directly by either National Gas or our employment agencies is very low. Each month our payroll team also conduct multiple checks including for duplicate bank details. If a duplicate is identified, further checks are conducted to ensure that the accounts are for the same person rather than one account used for multiple employees.

We are committed to paying our employees and contractors working on our behalf at least the Real Living Wage as set by the Living Wage Foundation.

Chapter 4: Diversity, Equity, and Inclusion

We recognise the critical role that psychological safety plays in identifying and addressing potential risks. Through our Culture and engagement survey, we actively measure how safe colleagues feel to speak up, challenge behaviours and share concerns. This year, we increased this focus by including two extra psychological safety questions in the survey. This deeper focus enables us to take targeted steps to ensure that colleagues feel safe to speak up in practice, not just in principle, reinforcing the effectiveness of our Speak-Up (whistleblowing) policy and confidential reporting routes.

We have also embedded psychological safety into our leadership development programmes. This training supports leaders to create environments where colleagues feel safe to speak up, challenge behaviours and raise concerns without fear of negative consequences. Strengthening these capabilities is critical in enabling early identification of potential risks, including those related to the treatment of individuals or practices that may indicate exploitation.

We believe that fostering an inclusive culture across all of our workplaces more generally also supports the early identification of any potential concerns. For further details of our wider Diversity, Equality and Inclusion initiatives please refer to our [annual report and accounts](#).

Chapter 5: Our policies

Summarised below are our policies which collectively set the standards we require, encompassing the prevention of Modern Slavery in the workplace and in our supply chains.

Policy	Scope	Relevance to Modern Slavery
Code of Ethics	This is our company code of conduct that is applicable to employees and sets out our values and how we expect employees to behave whilst working for National Gas.	It includes sections on discrimination, harassment, bullying and human rights and sets out National Gas commitments to zero tolerance to all forms of corruption as well as the avenues available for raising concerns and how we will protect those who “speak up” about a concern.
Supplier Code of Conduct	This is reviewed, updated, and sent to all our suppliers on an annual basis, setting out the standards we expect our suppliers to work to and which they should extend into their own supply chains.	It includes reference to the key international labour standards including the Ethical Trade Initiative base code and the UK real living wage requirement. We encourage all suppliers to publish a modern slavery statement regardless of legal obligation. Suppliers are committed to its adherence through our onboarding and contracting processes
Recruitment	Our recruitment policies ensure that employees have equal opportunities, the relevant rights to work and are employed in line with all local legislative requirements.	There are stringent background checks in place for the onboarding of direct hire employees to safeguard human rights, minimising the risk of directly recruiting someone who is being forced to work or is being trafficked.
Inclusion and Diversity	This policy sets out National Gas commitments to providing an inclusive, equal, and fair working environment for all.	Recognises and respects the importance of an inclusive and diverse workforce.
Disciplinary (internal)	This policy sets out what actions will be taken when employees deliberately break the requirements set out in the Code of Ethics.	All employees know what is expected of them and the consequences of misconduct.
Anti-Financial Crimes Policy	This policy sets out our commitment to prevent financial crime and corruption. It applies to all employees and those who work on our behalf.	References modern slavery and sets out the duty of all employees to be vigilant in guarding against and reporting unusual activity or payments.
Contracted Service Provider Background Checking Policy	This policy sets out the requirements for the background checking of contractors working for or on behalf of National Gas.	These requirements ensure that our contractors have the relevant rights to work and identification documents, which include address history and previous employment checks. Our managed contracts are audited annually for compliance.

Chapter 6: Supply Chain and Due Diligence

We work with around 1,500 suppliers across National Gas, including National Gas Services, and last year spent c.£895 million with them.

We spend approximately 55% of our annual budget with 20 organisations. Most of our tier one (direct) suppliers are based out of the UK and Europe.

The standards we expect, relating to working conditions, pay and workers' rights for those working in our supply chain, are mandated in our contracts through our Supplier Code of Conduct and embedded within our contractual terms. Our top 20 suppliers are also required to complete an annual Supplier Code of Conduct compliance declaration, reaffirming their adherence to these standards.

We continue to collaborate across the industry and work with our suppliers to improve approaches to identify and mitigate potential risks of exploitation.

We pre-qualify our suppliers using a vendor registration system operated by Achilles called the UVDB. Achilles UVDB requests suppliers to submit information as part of the pre-qualification and supplier onboarding process, including details of their policies and controls covering areas such as human rights, Modern Slavery, ethics and labour practices. These submissions form part of our due diligence processes and are reviewed to assess alignment with the expected standards and to identify potential risks.

We include specific requirements within our procurement processes to ensure commitment to the Modern Slavery Act supported by contractual audit rights to evidence compliance on a planned or ad-hoc basis.

We will look to monitor compliance through audits and targeted reviews, including the launch of the Supplier Code of Conduct audit process for higher-risk suppliers. This has been further supported by the introduction of a dedicated Supply Chain Risk and Assurance role, providing enhanced oversight, structured assurance activity and continuous improvement of controls.

We have also enhanced capability and awareness through targeted training delivered via the Supply Chain Sustainability School, ensuring colleagues understand due diligence requirements and how to apply them in practice.

Chapter 7: Awareness and Training

We continuously promote openness and transparency and provide avenues available to all employees and those working on our behalf to raise any ethical or compliance concerns. We have a Speak-Up Policy, published alongside our Code of Ethics, which sets out the process for raising such concerns. As part of our speak-up processes we have a confidential helpline available, operating 24/7, which our workforce can use to safely raise any concerns. Details of this helpline are available in our Code of Ethics and Speak-Up Policy (which is available on our website) and Supplier Code of Conduct.

We take all allegations of any type of unethical or illegal behaviour very seriously and we have a dedicated ethics and investigations team who are trained to deal with all reported concerns sensitively and thoroughly. We carry out independent investigations and take any relevant action. Any outcomes and findings from investigations are reviewed and relevant leaders within our organisation are made aware of the investigation findings. Each year we track supporting metrics through our employee engagement survey.

Our induction programme provides training and awareness of our Code of Ethics to all new starters. In addition, we have ongoing mandatory training for all employees on topics related to our Code and understanding the process for raising concerns.

We encourage our procurement staff and suppliers to use the free training and resources that are available through the Supply Chain Sustainability School, including the use of the Modern Slavery learning pathways.

Chapter 8: Focus areas for Financial Year 2027/28

We fully support the need to demonstrate continuous improvement and commitment to tackling the risk of Modern Slavery. Each year we will review our approach and set our commitments for the next 12 months, recognising the need to continue to keep our commitments realistic and achievable. We commit to:

Our People

- Continuing to upskill our teams and wider stakeholders to raise awareness of risks and embed supply chain human rights considerations as part of our business-as-usual thinking and actions.

Supply Chain

- Maintaining our Supplier Relationship Management framework to provide a key forum for human rights and sustainability focus within our critical suppliers, which will include evidencing adherence to the Modern Slavery Act.
- Implementing the Supplier Code of Conduct assurance programme for our top 20 suppliers, establishing a structured, risk-based approach to monitoring supplier compliance with human rights and Modern Slavery requirements.
- Monitoring supplier compliance through targeted audits and assurance reviews, including the rollout of the Supplier Code of Conduct audit process for higher-risk suppliers, with an initial focus on strategic suppliers and a phased expansion across the wider supply base.

Reporting

- Establishing a suite of procurement performance metrics that include our supply chain sustainability and human rights obligations.

Statement of Approval

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that National Gas have and will be taking with respect to preventing both Modern Slavery and human trafficking within our business and supply chains for the Financial Year 2026/27 period.

This statement applies to National Gas Transmission plc and National Gas Metering Limited and has been approved by the respective Boards.



Jon Butterworth
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15 July 2026

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