



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (“the Act”) and sets out the steps that we, South East Water Limited (“SEW”) have taken (and are taking) to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

Our Business and Supply Chain

SEW is a regulated water supply company in England and Wales, and our business predominately focuses on the supply of drinking water in the South East of England to the 2.2 million people living in our supply area who depend on us to deliver safe, high quality drinking water 24 hours a day, 365 days a year.

Our supply chains include a wide range of suppliers across all our requirements for example, everything from the supply of stationery for the office to our large capital delivery programme.

Our Policy on Slavery and Human Trafficking (Ethical Purchasing Policy)

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy contained within our ‘Ethical Purchasing Policy’ reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Due Diligence processes regarding Slavery and Human Trafficking

We have zero tolerance to slavery and human trafficking. As part of our initiative to identify and mitigate risk we have in place systems to identify and assess potential risk areas in our supply chains. We operate a ‘whistle blowing’ policy so that any staff can raise any concerns confidentially and anonymously.

We carry out activities in compliance with law and we ensure that all our employees are paid at the Living Wage and we check that all our staff have the right to work in the UK. We require that our supply chain comply with these same standards.

Our procurement processes include a number of checks and reviews to ensure that any suppliers that we engage with can meet the requirements of our Ethical Purchasing Policy, or that they have an equivalent policy themselves that we will also review. Where the contract value is over £100,000 we will generally engage our suppliers through a pre-qualification procurement system (Achilles) which also undertakes a number of checks in relation to the modern slavery act requirements.

Steps we took last year

Last year, and in order to ensure compliance with the Act, we:

1. reviewed our supply chain for those that could pose a risk in relation to modern slavery. For example we look for any suppliers from high risk countries; labour heavy contracts and suppliers providing certain high risk raw materials and also the type of industry, for example, construction and fabric production. Where any are highlighted we have undertaken an audit and in some cases we have undertaken a site visit as well. We are pleased to confirm that no concerns have been found so far;
2. continued an ongoing e-learning programme to train all staff when they join the company and thereafter on an annual basis on Modern Slavery.

Further Steps

We shall continue to conduct audits to review our supply chain and to conduct visits where appropriate specifically to assess any suppliers that could be considered high risk to ensure we are doing all we can to commit to eliminating Modern Slavery.

We plan to train more people to be able to undertake a Modern Slavery audit so that it can be more ad hoc when people are on supplier's sites for other reasons to be more efficient with our visits.

This statement constitutes South East Water's slavery and human trafficking statement for the financial year ending 31st March 2019.

This statement has been approved by the Board of South East Water at the Board meeting 26th September 2019.

Signed

A handwritten signature in black ink, appearing to read 'Paul Butler', with a horizontal line underneath.

Paul Butler
Managing Director
South East Water