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", "we" or "our") 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. Our shareholders comprise of pension funds and other long term investors and our business predominately focuses on the operation and maintenance of c.15,000km of water pipes, supplying c. 530 million litres of drinking water every day to 2.3 million customers in Kent, Surrey, Sussex, Hampshire and Berkshire. Our customers 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 of our requirements for example, everything from the supply of stationery for our offices to our major capital delivery programme and the supply of goods and services.

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-Modern 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 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 'Speaking Up' policy so that our staff can raise any concerns confidentially and anonymously.

Our Employees

We employ approximately c.1,000 people and we use an independent third party provider to undertake pre-employment checks before individuals commence their employment with us, which includes identity checks and confirmation of their entitlement to work in the UK. We carry out these activities in compliance with the law and we ensure that all our employees are paid at or above the Living Wage. We require that our supply chain carry out similar due diligence checks and adhere to similar standards.

All of our employees are required to complete annual training on a number of our key policies and legal obligations, and this includes a specific e-learning module on Modern Slavery. We review our employee training content in line with changes to law and regulation.

Our Supply Chain

The majority of our supply chain is subject to contractual obligations to comply with our Ethical Purchasing Policy or the supplier's own equivalent policy (which we review) and to inform us of any potential or actual breaches that they may be aware of immediately. We also have standard contractual provisions to allow for periodic and targeted audits of compliance while using a risk-based approach.

Additionally, where the value of a supply contract is over £100,000 we will generally engage suppliers through a pre-qualification procurement system (Achilles) where suppliers are pre-qualified in relation to their compliance with the Act. We also ask these suppliers to confirm that they have in place a documented policy to ensure that neither slavery nor human trafficking takes place within their organisation; and to confirm whether they have had any convictions or breaches of any slavery laws in any countries that the suppliers operates in over the last 5 years.

Steps we took last year

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

1. reviewed those of our supply chain which 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. We then undertake an audit and are pleased to confirm that we have found no concerns on those suppliers we have audited. This was undertaken by our contract managers for the first time rather than the Modern Slavery Team, which is led by Legal and Procurement.
2. continued an ongoing e-learning programme to train all employees when they join the company and thereafter on an annual basis on Modern Slavery
3. continued to explore ways to conduct Modern Slavery audits remotely
4. have trained our Health and Safety team to be able to undertake audits when attending site visits with our supply chain
5. have commenced a review with our investors and lenders to consider any improvements in relation to anti-Modern Slavery that can be made in the due diligence process

Further Steps

We are continuing to explore a way to conduct an initial Modern Slavery audit using technology such as video tour to allow for visits to be carried out remotely due to travel. So far we have not found a solution that will allow for unplanned interactions. If this is achievable we will consider rolling it out as training for all contract managers.

We are continuing to undertake a review of our key contractors to look at the quality of the Modern Slavery training they undertake to see if we can recommend any improvements.

We plan to look at how we can help our risk mapping beyond our direct suppliers.

We will review whether a third party review of our modern slavery approach would be useful.

We will review the makeup of the Modern Slavery Team to ensure that we have the right representation from our business and ensure that the appropriate links are made with other relevant groups within the business, such as our Responsible Business Steering Group. We will also consider whether members of the Team would benefit from specific training and Ethical Procurement Supply certification.

This statement constitutes South East Water Limited's slavery and human trafficking statement for the financial year ending 31st March 2022.

This Statement has been approved by the Board of South East Water Limited at a meeting on 22nd September 2022.

Signed



David Hinton
Chief Executive Officer
South East Water Limited