



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 we have 2.1 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 business predominately focuses on the supply of drinking water in the South East of England and provides wholesale water services and retail services to both our household and non-household customers.

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

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 as well as any staff in our supply chain are paid at the Living Wage. We check that all such staff have the right to work in the UK.

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. 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.

In order to ensure compliance with the Act, we have updated our standard contractual clauses to ensure that suppliers comply with this Act and can demonstrate this by providing a copy of their own anti-slavery and human trafficking policies. We are providing existing suppliers with a copy of our updated Ethical Purchasing Policy, which they already have a contractual obligation to comply with.

We have a dedicated compliance team made up of representatives from the following departments to review on a regular basis:

- Legal;
- Human resources;
- Procurement; and
- Contract Management.

Further Steps

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff. This is targeted at those areas of the business which are best able to identify and manage any risk of human trafficking or slavery.

This statement constitutes South East Water's slavery and human trafficking statement for the financial year ending 31st March 2016.

This statement was approved by the Board of South East Water Limited at the Board meeting 15th September 2016.

Signed



Andrew Farmer
Finance Director
South East Water Limited