



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 (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 and require that 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.

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

1. included a specific contractual clause in our supplier contracts to ensure that suppliers comply with this Act and as a minimum will comply with our Ethical Purchasing Policy;
2. we set up a dedicated compliance team made up of representatives from our Legal, Procurement, Human Resources and Contract Management teams; and
3. We undertook to train every member of our staff on Modern Slavery and how to recognise it in our business or supply chain and what to do if they do see it.

Further Steps

We will be conducting an audit process to review our supply chain and to conduct visits 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.

This statement constitutes South East Water's slavery and human trafficking statement for the financial year ending 31st March 2017.

This statement has been approved by the Board of South East Water at the Board meeting 28th September 2017.

Signed

A handwritten signature in black ink, appearing to read 'A Farmer', with a long horizontal flourish extending to the right.

Andrew Farmer
Finance Director
South East Water