

# Modern Slavery and Human Trafficking Statement

## Scope of Statement

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Sutton and East Surrey Water plc, trading as SES Water, have taken to ensure that their businesses and supply chains (where relevant) are free from modern slavery and trafficking during the financial year ended 31 March 2022.

## Introduction

SES Water, which is the trading name of Sutton and East Surrey Water plc, is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that its supply chains are also free from such practices. We have responsibility under the Modern Slavery Act 2015 to ensure transparency in the provision of all our goods and services.

## Organisational structure and operations

SES Water is a regulated water supply company. It supplies more 745,000 customers across east Surrey and parts of West Sussex, west Kent and south London.. It employs 342 people. SES Water had an annual turnover of £62.9 million for the year ended 31 March 2022.

SES Water is part of East Surrey Holdings Limited ("ESH") which acts as a holding company with investments in water and other trading and property companies within the ESH Group. ESH is jointly owned by the Japanese businesses, Sumitomo Corporation and Osaka Gas. Each of these has a 50% stake in the UK holding company Sumisho Osaka Gas Water UK Limited. These shareholders' offices are in Japan.

## Nature of supply chains

SES Water procures a variety of works, supply and service contracts to ensure it provides a reliable and sufficient supply of safe, high quality drinking water and delivers on its purpose, values and aims. Its suppliers are diverse and range from engineering construction and maintenance to energy, chemicals, fleet, water treatment and distribution products and professional consultancy services. Support services are provided by specialist suppliers in facilities management, IT and telecommunications.

It aims to take appropriate measures to ensure that its suppliers adhere to the same high standards.

## Effective Action

The Company has zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their families, or close associates. Employees do not suffer any detriment to their salary or benefits unless it falls under our terms and conditions of service. All employees are treated fairly and in accordance with its policy on equality.

As part of the Company's recruitment process, it undertakes rigorous checks to ensure that all employees have the right to work in the UK. Salary payments are made directly to employees and will not be delayed, deferred or withheld. Only deductions, advances or loans authorised in law are permitted with the full consent of the employee. This is reflected in information provided to all employees, including contracts of employment and the employee handbook which provides clear and transparent information about hours worked, rates of pay and details of other benefits.

Employees are not forced to work in excess of the number of hours permitted in law. Normal working hours and overtime do not exceed 48 hours per week average over a 17 week period unless in the event of emergency and with the agreement of the employee.

## Due diligence processes

As part of the company's initiative to identify, monitor and mitigate risk, it reviews its processes to make certain that slavery does not take place in its supply chain.

Pertaining to its due diligence:

- Supplier assessment process requires business critical suppliers to outline the controls they have in place to combat slavery and human trafficking. This is achieved through the completion of a supplier assessment which is monitored and controlled as part of its quality management system and externally assured against the ISO9001 Quality Standard.
- Senior Managers continually monitor processes to provide appropriate levels of control.
- Monitoring of compliance is regularly reported to the Board.

It also utilises MyAchilles which is a third party provided qualification tool enabling SES Water to provide a fair, open and transparent supplier selection process for strategic procurement events or tender opportunities which meet OJEU thresholds. The MyAchilles tool supports compliance with UK procurement legislation and provides a facility for supply chain management.



In addition, it includes specific questions relating to the Modern Slavery Act in the pre-qualification process when inviting new suppliers to tender for goods or services and includes a clause within its Standard Terms and Conditions of Purchase which details the obligations required of its suppliers in relation to the Modern Slavery Act.

**In the coming year, it will continue to engage with its suppliers in ensuring compliance.**

It has zero tolerance to slavery and human trafficking and it does not knowingly support or deal with any business involved in slavery or human trafficking. Modern Slavery prevention is part of its terms and conditions.

In implementing the above systems, it endeavours to ensure employees and workers are not subject to any form of forced, compulsory or bonded labour in its supply chains. Employees to its suppliers should have freedom to terminate their employment at any time without penalty, giving reasonable notice.

Instances of non-compliance would be considered on a case-by-case basis, taking remedial action as appropriate, potentially including withdrawing from an existing commercial arrangement.

## Employee training

It has suitable awareness in the Procurement, Human Resources and Compliance Departments and provide training to all purchases of goods and service on the principles of the Modern Slavery Act.

**In the coming year, it is committed to continue to deliver awareness to all employees which will ensure that they understand the risks of modern slavery and human trafficking infiltrating its business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.**

## Monitoring of anti-slavery policy

Board and Senior Management have responsibility for implementing this statement and its objectives. They ensure adequate resources (training and administration etc.) and investment to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains, against the following commitments in our policy.

## SES Water Anti-Slavery Policy Commitments

### SES Water will:

- Ensure it have no acts of Modern Day Slavery within our business and employees are not subject to any form of forced, compulsory or bonded labour
- Ensure clear and transparent information is provided to employees about hours worked, rates of pay and the calculation of legal deductions.
- Ensure employees do not suffer any detriment to their salary or benefits unless it falls under our terms and conditions of service.
- Produce an annual statement on our website, including details of our activities and supply chain and actions we are taking to support Government.
- Provide a compliant procurement process and suitable procedures for supplier assessment, using our influence to improve transparency and accountability in our supply chain

### SES Water will not:

- Expect employees to work in excess of the hours permitted in law unless the employee agrees.
- Delay, defer or withhold salary payments made directly to employees. The only exception to this will be deductions, advances or loans which are either authorised in law or permitted with the full consent of the employee.
- Use suppliers found to be involved in modern slavery or human trafficking

In the year ended 31 March 2022, the Company has continued to follow all its modern anti-slavery policies and procedures and has utilised a constant monitoring process of these to ensure that modern slavery and trafficking do not appear in its organisation or supply chain.

This policy statement was approved by the Board for SES Water on 28 September 2022.



Ian Cain  
Chief Executive Officer

28 September 2022