

# Modern Slavery and Human Trafficking Statement

**30 September 2024**

Southern Water Services Ltd strongly opposes slavery and human trafficking and is fully committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

## Our Business

Southern Water Services Ltd is a private utility company responsible for the public wastewater collection and treatment and the public water supply and distribution in the south eastern part of the United Kingdom for more than 4.6 million people. The area in which we supply water and treat wastewater covers a total of some 10,530km<sup>2</sup> and extends from East Kent in the east, through parts of Sussex, to Hampshire and the Isle of Wight in the west.

### The registered Company details are:

Southern Water Services Ltd. Registered in England No. 2366670. Registered Office: Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX.

### Countries of operation and supply

Southern Water Services Ltd's water and wastewater supply area is solely within the UK.

## Our Service Partners

We employ a wide variety of goods and service suppliers, ranging in size from large multi-national organisations, to local specialists and which span several countries and continents. We value the role our partners play in helping us to deliver a quality service to our customers and are committed to ensuring that there is no modern slavery and human trafficking in our supply chains. We have processes in place to ensure that all suppliers of significant spend or risk, have a full qualification assessment which is validated independently of the procurement team. This is either as part of the requirement of the Utilities Contract Regulations 2016 or separately. This assessment includes Corporate & Social responsibility and mandatory exclusion for any offence under section 2 or section 4 of the Modern Slavery Act 2015. We expect our partners to comply with all applicable local laws and regulations and respect internationally recognised human and labour rights.

## Employment

Southern Water Services Ltd checks that all its employees and agency workers have the right to work in the UK, through a specialist third party verification agency, and our reward policy ensures that they are all paid at or above the minimum London living wage, which is in excess of the UK National minimum wage.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we have provided mandatory training to all of our employees and awareness for our agency contractors.

We also provide regular training to our procurement team on effective procurement processes, which includes the assessment of potential new suppliers and qualification. CIPS training on ethical procurement covering: environmental, fraud, bribery and human rights is now mandatory for the procurement team

## Policies

We operate the following policies that assist our approach to the identification of modern slavery risks and identify steps to be taken to prevent slavery and human trafficking in our operations:-

**Speak Up Policy (Whistleblower)** – We encourage all our employees and partner employees to Speak Up if they witness conduct which appears to breach laws, regulations or Southern Water's Code of Business Conduct policies, they should also Speak Up if they see conduct which feels inappropriate or unethical.

**Our Code of Ethics: Doing the Right Thing** – We clearly define the behaviours we expect from our employees and how we should make ethical decisions and operate our business responsibly. It is more than just a set of rules. It explains how we follow our values and key policies. It represents our commitment to doing the right thing

**Our Responsible Business commitments** – We set out the various ways we demonstrate our commitment to being a responsible business and what we will do to achieve this.

**Sustainable and Ethical Trading Policy** – Our policy on sustainable and ethical trading expands on our Responsible Business commitments. As part of our formal pre-qualification questionnaire, we assess our suppliers against these standards and request that they adhere to our Supplier Code of Conduct. We will either agree suitable remedial actions or apply proportionate contractual remedies for non-compliance of existing suppliers.

**Supply Chain Code of Conduct** – As an extension of our business, we expect our suppliers to be equally committed to our values, comply with all applicable local laws and regulations, and respect internationally recognised human and labour rights. This code sets out the core principles we expect all of our supply chain to comply with when doing business with us. It is aligned to our Sustainable and Ethical Trading Policy.

This Policy Statement will be reviewed and published annually.

A full copy of this policy, and a copy of the Modern Slavery Act 2015 is accessible to all employees electronically and can be obtained from the HR department upon request.

Lawrence Gosden  
Chief Executive Officer