

SE Trains Limited
(Southeastern)

SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE
MODERN SLAVERY ACT FOR THE 2022/23 FINANCIAL YEAR

Introduction

SE Trains Limited (Southeastern) supports the objectives of the Modern Slavery Act 2015 ("the Act") of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act.

The Act requires commercial organisations to publish a statement as to the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This obligation applies to organisations that carry on business in the UK and which have a total annual turnover in excess of £36million. This statement is therefore made by Southeastern in accordance with the Act. The statement is also made to recognise the importance of transparency and preventing slavery and human trafficking from occurring within its supply chain. Southeastern is therefore making this statement as set out below.

We directly employ approximately 4,500 staff and agency workers. We have strict recruitment processes in place, and work closely with our approved recruitment agencies. All agencies are subject to a rigorous procurement process. They are required to give contractual commitments to comply with the Act and put in place appropriate policies and practices to ensure our staff and agency workers have the appropriate right to work and, (to the extent possible) are paid the Real Living Wage and / or London Living wage. As such, we believe that the risk of forced or trafficked labour being employed by Southeastern, either directly or through agencies, is low.

The United Kingdom and EU has developed a culture of ethical business practice and strong labour regulation. We recognise that Southeastern has a responsibility to manage the risk of slavery and, or human trafficking taking place within our supply chain. Our suppliers are mostly based within these countries and we have assessed the overall risk for Southeastern contracting with organisations that engage in slavery or human trafficking as being relatively low. This is determined on the nature of the services provided, the supplier's geographic location and their obligation to comply with the Act and/or the EU Charter of Fundamental Rights.

Organisation and Structure

SE Trains Limited is a publicly owned subsidiary of DfT OLR Holdings Limited (DOHL).

We are a member of the Rail Delivery Group (RDG), which brings together the companies that run Britain's railway into a single team with one goal - to deliver a better railway for the British public and our communities.

Policies in relation to Modern Slavery and Human Trafficking

Southeastern's anti-slavery and human trafficking approach reflects our continued commitment to respect the human rights of those who work on our behalf.

We are committed to preventing acts of modern slavery or human trafficking in our supply chain and/or in any part of our business. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective due diligence and contractual compliance to prevent slavery and human trafficking in our supply chain

Southeastern operates a responsible Procurement Policy and Procurement Social Value Charter which detail our commitments to sustainable and socially responsible procurement and ensure that suppliers are required to subscribe to Social Value Portal. This reinforces our suppliers statutory commitments to tackle modern slavery and human trafficking in their supply chain. This requirement is included in our tenders and when offering and awarding business to suppliers and is integrated into supplier contracts.

We monitor compliance within our supply chain by reserving the right to visit suppliers' and sub- contractors' facilities to audit performance. Furthermore, we reserve the right to audit any tier of our supply chain. Where we find concerns, we work with suppliers to create a corrective action plan for achieving compliance in clearly defined and reasonable timeframes.

We also take direction from the RDG, who have a policy function to develop policy and provide responses to government consultations on behalf of the whole industry.

Due Diligence and Risk Assessment

Each year Southeastern assesses the risk of its susceptibility to modern slavery and trafficking in its business and its supply chain. We continue to believe that those areas, which carry the highest risk of employing slave or trafficked labour, are all manufacturing processes or other areas of labour such as cleaning, security and gate line colleagues ("**At Risk Functions**" / "**ARFs**").

Southeastern risk assesses prospective suppliers by requiring, at the outset of the procurement process, confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking.

We intend to continue to mitigate as much risk as possible by procuring in compliance with Utilities Contract Regulations 2016 and utilising frameworks where it is commercially viable and legislatively possible to do so. For example, we use the Crown Commercial Service frameworks, which are tendered under Public Contracts Regulations 2015 procurement rules and perform extensive due diligence when vetting prospective suppliers.

We will continue to include pre-qualifying questions for tenders and terms and conditions in our contracts with suppliers which require compliance with the Act. Existing clauses in our standard procurement terms enhance the strength of our contractual promises from suppliers in the area of modern slavery and human trafficking.

We will continue to discuss the Act with our suppliers, and ensure they take proportionate and appropriate action to eradicate modern slavery and human trafficking in their supply chains.

Steps Taken to Tackle Modern Slavery

Steps being taken include;

- Requesting information from those suppliers identified as medium to high risk as to the steps they have taken to address slavery and human trafficking in the territories in which they operate, including the outcome of any due diligence carried out on their own businesses and high-risk suppliers further down the supply chain.
- Incorporating any relevant procedures into existing Southeastern policies in order to inform employees of the process to follow where instances of slavery and human trafficking are suspected and to raise awareness and profile of the issue generally across Southeastern's workforce.
- Mandatory training on Modern Slavery for all relevant staff.
- Ensuring that terms and conditions requiring compliance with the Act are included in all tendered contracts.
- Where possible, procure from Crown Commercial Services frameworks.

Training on Modern Slavery and Trafficking

On-line training is mandatory for relevant roles and must be retaken on a biannual basis. All Southeastern colleagues also have access to the Southeastern Whistleblowing Policy and Whistleblowing hotline which allows them to identify and report any legitimate concerns that they may have had without recrimination and in a confidential and secure manner.

We have reviewed the effectiveness of the current steps we have taken this year and we intend to continue to undertake these activities and take the following additional steps in order to identify any issues and ensure continued compliance with the Act:

- Develop and implement policies that reinforce Southeastern's commitment to working towards

- being an ethical business.
We will continue to monitor Southeastern's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place within Southeastern's supply chain.

Supplier Adherence to our Values

As part of our zero tolerance approach to modern slavery and human trafficking within our business, or supply chain, we include mandatory contractual terms with suppliers which require them to comply with our anti-slavery and trafficking policy, or their own equivalent. This enables us to enforce these requirements or terminate business with non-compliant organisations.

We include questions relating to compliance with the Act as part of our pre-qualification questionnaire and in our tenders for all new suppliers.

Board Sign-off

Southeastern remains dedicated to strengthening its practices to continuously reduce its exposure to slavery and human trafficking risks. We will continue to monitor Southeastern's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place within Southeastern's supply chain.

The Board of SE Trains Limited, a subsidiary of DOHL, have endorsed, approved and adopted this Modern Slavery Act statement for and on behalf of SE Trains Limited.



Steve White
Managing Director
SE Trains Limited