

SE Trains Limited

(Southeastern)

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT FOR THE 2024/25 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 detailing the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This requirement applies to organisations operating in the UK with an annual turnover exceeding £36 million. Southeastern therefore issues this statement in compliance with the Act and to underscore our commitment to transparency and to highlight our dedication to preventing slavery and human trafficking within our operations and supply chain.

We directly employ over 4,900 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/ 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 low. This is determined by 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 Operator Limited (DFTO) formerly known as DfT OLR Holdings Limited (DOHL). The UK Government's public sector rail owning group established by the Department for Transport (DfT) in 2018.

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 safe more reliable & efficient railway for our passengers, the British public and our communities.

Southeastern is also part of the first integrated railway with Network Rail Infrastructure Limited (Network Rail) who are the owner and infrastructure manager of the railway network in Great Britain. Southeastern and Network Rail (Kent Route) have come together to bring track and train closer together under a single leadership team to improve performance of rail services, deliver better outcomes for our customers and reduce the net subsidy provided to Southeastern and Network Rail.

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 through the procurement process 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 the Procurement Act 2023 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 or The Procurement Act 2023 procurement rules ((as applicable) and perform extensive due diligence when vetting prospective suppliers.

We continue to include a pre-qualification questionnaire as part of the tender process for all new suppliers. These questions require suppliers to provide information on how they monitor their supply chain to combat modern slavery and ensure adherence to the Act.

We 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 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.
- An ongoing commitment to act swiftly and conclude investigations in response to any complaints relating to acts of modern slavery either internally or from suppliers.
- 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.
- We have been assessed, audited and certified by Action Sustainability under the ISO20400 sustainable procurement standard.
- Our procurement team have been provided with additional bespoke supply chain modern slavery prevention training by Action Sustainability.
- Delivered new guidance on Domestic Abuse which includes different forms of mistreatment including coercive and controlling behaviour and forced marriage.
- Our Board have appointed an Executive Board level sponsor to support our safeguarding team and White Ribbon Steering Group to continue their work on our Safeguarding Strategy and developing the digital safeguarding training (the first rail industry CPD certified training program) to tackle violence, trespass, suicide prevention, and protecting vulnerable people, which includes tackling trafficking across county lines and child sexual exploitation by collaborating with the British Transport

Police, Home Office Police Forces and our community partners including youth outreach, Drugs & Alcohol and Homelessness services.

- Attending an RDG hosted industry wide workshop on tackling Violence Against Women and Girls, with members of our Safeguarding Team being selected to sit on the DFTO VAWG Working Group and VIAWG Steering Group
- Launching a new Eyewitness Intelligence System (EIS) App to enable the reporting of incidents internally and to the British Transport Police.
- Developing mandatory training for preventing sexual harassment in the workplace
- Introducing a new video on Violence Against Women and Girls.
- Rolling out the use of Body Worn Video more widely for front line staff as part of their uniform which has identified individuals and enabled authorities to intervene and support those subject to modern slavery or trafficking.
- Engaging with RSSB to become a member of the Rail Safety Standards Board (RSSB) Modern Slavery Solutions Sharing Group (MSSSG) to actively engage and participate in sharing best practices for tackling modern slavery across the rail industry.
- Reviewing and updating our Modern Slavery Policy.
- Reviewing and updating the mandatory modern slavery training for all relevant staff.
- Developing a strategy to embed our sustainability pillars that are set out in our Procurement Social Value Charter.
- Reviewing and updating our standard procurement contract templates to include provisions that require all suppliers to take practical steps to monitor its business and downstream supply chain and provide Southeastern with assurance by reporting on the steps it has taken in the form of a statement.

Training and Reporting on Modern Slavery and Trafficking

Online training is mandatory for relevant roles and must be completed every two years. 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. Southeastern have also launched a separate and confidential reporting line called, Speak Up, which employees can use, to speak to a member of our People Team about anything that may be affecting their work, including, any concerns relating to modern slavery.

Supplier Adherence to the Act

As part of our zero-tolerance approach to modern slavery and human trafficking within our business and supply chain, we include mandatory contractual 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 and 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.

Tackling Modern Slavery in our Supply Chain

We have reviewed the effectiveness of the current steps we have taken and we intend to continue to undertake these activities to reinforce Southeastern's commitment to working towards being an ethical business. In addition, during 2025 and beyond, as part of our continuing commitment to further reduce the risk of slavery and human trafficking, Southeastern will be:

- working towards developing a sustainable way of procuring which includes developing better due diligence processes so that we can understand how to respond to risk of modern slavery in our supply chain and adapt our procurement strategies to address the challenges and key risks of modern slavery through the procurement process.
- exploring possibilities to develop resource to support SMEs in our supply chain to help prevent modern slavery and harness other social value benefits.

- requesting information from suppliers during the tender stage regarding the initiatives they have taken throughout the local and global supply chain to strengthen the identification, monitoring and reduction of risks of modern slavery and unethical work practices occurring downstream in their supply chain.
- Continuing its work towards British Standard - BS25700 organisational response to modern slavery guidance.
- Exploring the use of the Governments Modern Slavery Assessment Tool (MAST) for our medium-to-high-risk 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 DFTO, 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