

# Modern slavery

Escalation and  
remediation policy

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## Severn Trent – Modern Slavery escalation and remediation policy

### Policy statement

*We have a zero tolerance approach to modern slavery. Through the steps we have taken, set out in our anti-slavery and human trafficking statements, we believe we have a low risk of modern slavery in our business and supply chain.*

*To date, no instances of modern slavery have been raised within our business or supply chain, however, we're not complacent and recognise our responsibility to report instances of discovered slavery to the appropriate authorities and support any victims of slavery detected within our business or supply chain. All concerns are taken seriously and investigated thoroughly.*

*This policy applies to the whole of Severn Trent Plc, its subsidiaries and its supply chain. It is based on best practice guidance on remediation in line with the International Labour Organisation (ILO) and the UN Guiding Principles on Business and Human Rights.*

*This policy sets out the principles by which we would act in the case of a victim of modern slavery being identified and also details our escalation process on how we would deal with any concerns raised.*

### Escalation process and responsibilities

*Key steps we would take if an instance of modern slavery is detected or suspected within our business or supply chain.*

#### **1. Concern raised**

Through training and raising awareness we have directed employees and our supply chain to voice any potential concerns through the following channels:

1. Directly to the modern slavery working group,
2. through their line manager or,
3. through their HR Business Partner or the HR advice line.

Alternatively, our independent whistleblowing line – Safecall, is available 24/7.

**Safecall: 0800 915 1571**

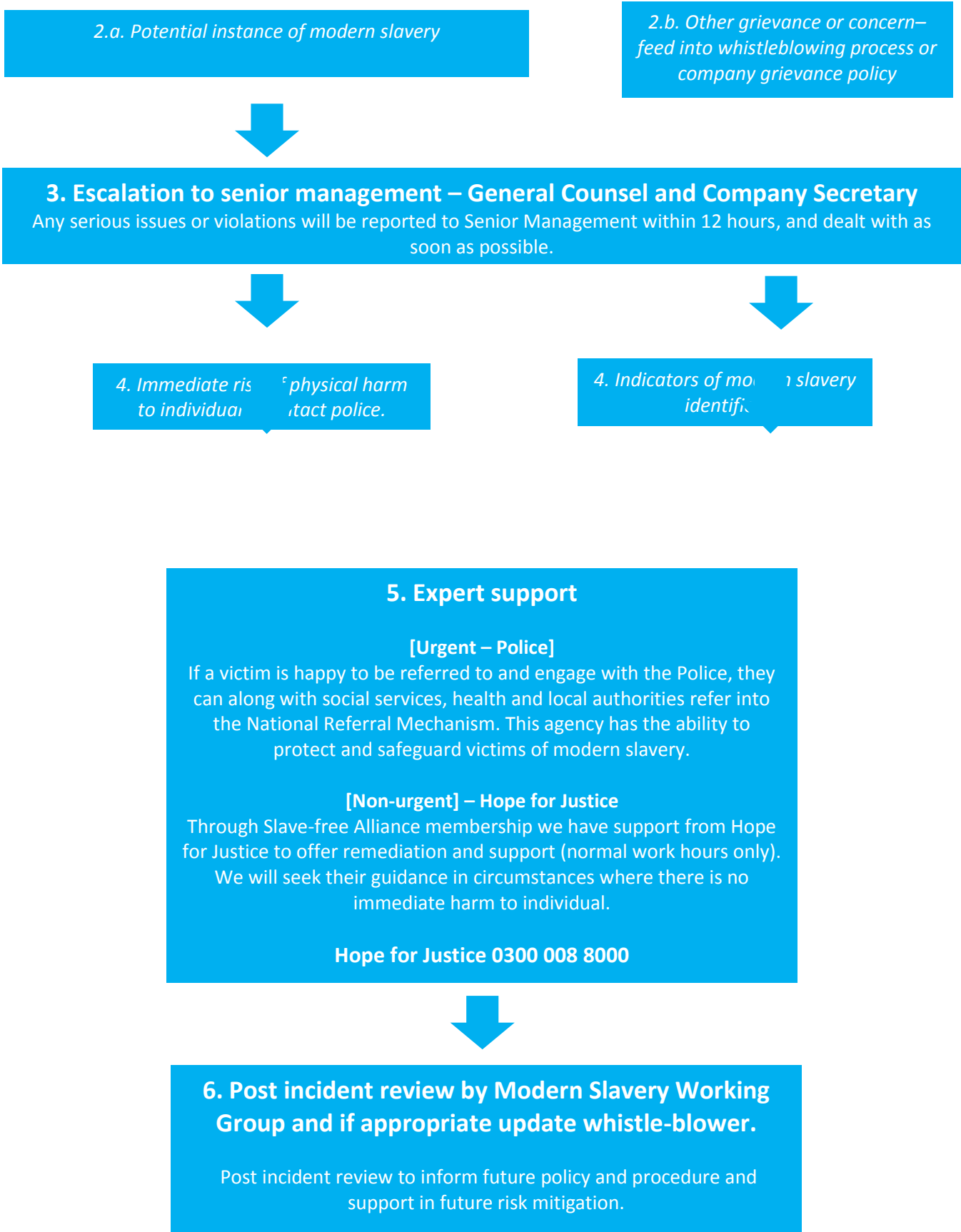
If there is a serious risk of physical harm to an individual, all employees and suppliers should call 999.



#### **2. Initial assessment by Modern Slavery Working Group**

Initial review of concern by modern slavery working group in order to understand scale of concern and if immediate action is needed. All instances of Modern Slavery will be reviewed.





*Act in line with our remediation principles.*

### Remediation principles

*We acknowledge that remediation can take many forms, and will depend on the individual's needs. This is a set of principles which we commit to acting in line with:*

- **Victim centred remediation** - Protecting the victim of slavery will be our first priority. Our approach will be victim led, consultative and involve multiple stakeholders to ensure the best possible outcome for the victim.

We will be driven by the wishes and needs of a victim unless there is a serious risk of physical harm to that individual, or anyone else as a result of any disclosures made. We have a responsibility to protect them from physical and or serious moral harm and will work with partner agencies to ensure this, even if the victim does not want any action taken.

We will seek to support the victim throughout the process, take steps to protect confidentiality and ensure a timely response.

We acknowledge that victims have the right to pursue other forms of remedial action at any stage.

- **Treat cases individually** – We will treat each victim(s) on a case by case basis and take individual circumstances into account when creating a bespoke care plan.
- **Follow advice of experts** – We recognise that we don't have the specialist expertise to assess and identify what support is needed. Any concerns would be raised to either the police, our charitable partners Hope for Justice or the national referral mechanisms as appropriate. In all non-urgent cases, we will first seek approval of the victim to share concerns and/or circumstances with any partner authorities, including the police. In cases where a victim does not wish to engage, we would seek advice from our charitable partners, Hope for Justice, to determine the best approach.
- **Collaborative approach with our supply chain** - In the instance of modern slavery being detected within our supply chain we are committed to working with suppliers to help eliminate slavery and support those impacted. This would always be our preferred approach, however this may be reconsidered if a supplier refuses to engage with us. For cases identified in the supply chain, we will ensure the victim has agreed for information to be shared.
- **Ongoing victim support** – We are committed to exploring opportunities to support victims throughout remediation, and would adopt a victim centred approach. Under expert guidance we will assess what remedy we can offer the victim and use our resources to the best of our ability.
- **No repeat and adapt our approach** - If any potential cases of slavery are raised we will investigate them fully to understand the root cause of any exploitation and take action to improve our processes to ensure no reoccurrence. We are committed to building new learnings into our future strategy, continually reviewing and adapting our approach to ensure it is

appropriate and effective in tackling modern slavery and supporting those impacted. In addition, support will be provided to the individual who raised the concern if required.

Signed on behalf of Severn Trent Plc and its Group Subsidiaries Severn Trent Water Limited, Severn Trent Services Defence Limited and Severn Trent Services Operations UK Limited.



A handwritten signature in black ink, appearing to read 'Liv Garfield'.

**Liv Garfield**  
Chief Executive Officer  
Severn Trent PLC

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