

MODERN SLAVERY ACT 2015 STATEMENT FOR APRIL 2023 – MARCH 2024

INTRODUCTION

At MWH Treatment we oppose Modern Slavery and understand the specific risks faced by the construction sector as a target industry for human trafficking. We are committed to taking all steps to try and eradicate Modern Slavery or human trafficking from our organisation and supply chains.

This statement is signed by Paul Bresnan, Chief Executive Officer, and has been approved by the boards of all the MWH companies registered in the United Kingdom.

OUR ORGANISATION STRUCTURE AND SUPPLY CHAINS

MWH Treatment is a leading contractor in the water sector, providing long-term solutions and assured delivery to our clients with innovative, affordable solutions to protect, enhance, store, and distribute water and treat wastewater. We directly employ over 1000 people and place orders annually with an aggregate value of more than £500m. From working primarily within the UK, we apply our skills to provide a full range of start-to-finish construction services and asset management, including planning, design, engineering, procurement and construction, commissioning, operations, and data collection.

MWH Treatment uses approximately 3,000 suppliers and subcontractors to support our organisation across the UK. Our supply chains include professional service firms, subcontractors and suppliers of services, goods, plant, and equipment.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

MWH Treatment operates the following policies which reflect our commitment to acting ethically and with integrity in all our business relationships; and to implementing and enforcing effective systems and controls which try to eliminate slavery and human trafficking. All our policies are reviewed on an annual basis.

- Sustainability Policy Statement
 - Our Sustainability Policy outlines the business approach to achieve our aim for balancing social and environmental requirements with financial prosperity and growth.
- Responsible Business Policy Statement
 - Our Responsible Business Policy outlines the company sustainable and responsible business approach by managing through seven key areas: governance; health, safety and wellbeing; environment; net zero carbon; business processes and quality; people; and communities.
- Sustainable Procurement Policy
 - Our Sustainable Procurement Policy sets the standard for procurement activities across the business.
- Anti-Modern Slavery Policy Statement
 - Our Anti-Modern Slavery Policy Statement covers our company approach and the expectations on the supply chain.



**MWH
TREATMENT**

Policy Statement

Anti-Modern Slavery

Modern Slavery is an abhorrent and often hidden crime. It includes slavery, human trafficking, and forced and compulsory labour.

MWH Treatment has a zero-tolerance policy regarding Modern Slavery and expects all our employees, contractors, and suppliers to share this commitment. We are committed to transparency in our own business and in our approach to holding Modern Slavery throughout our supply chain. Our approach will be through:

Our Statement

We will comply with The Modern Slavery Act 2015 and publish an Annual Transparency Statement. We will embed our Anti-Modern Slavery approach within our business and supply chain, with governance from the Anti-Modern Slavery Working Group.

Communication and Awareness

We will communicate our organisation to ensure awareness of Modern Slavery and provide guidance for employees, with awareness training for all employees and continuous learning for those in roles with the potential to encounter Modern Slavery.

Employees

We will treat everyone with respect, regardless of their colour, race, gender, disability, age, marital status, or employment as detailed in our Equal Opportunities Policy. We provide all our employees with a safe and healthy working environment.

We apply a robust recruitment and on-boarding process and will adhere to all Right to Work legislation.

Suppliers

We work with suppliers who have zero tolerance to slavery and human trafficking and comply with the Modern Slavery Act 2015. We will work with our suppliers to ensure they are also aware of and understand Modern Slavery.

Our requirements will be embedded within our procurement processes including our supplier evaluation procedure, which consists of Modern Slavery Assessment and Modern Slavery Statement. All our suppliers and supply chain are required to signatory to our Sustainable Supply Chain Charter.

We will undertake risk-based threat assessments and audits on our supply chain with the aim of mitigating risk. If issues are identified, we will work with our supply chain to rectify them.

Management are responsible for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. This policy applies to all persons working for us or on our behalf in any capacity, including employees, apprentices, workers, contractors, temporary workers, volunteers, contractors, external consultants, third-party representatives and business partners. Any suspected violation of this Policy by an AWHT employee or third-party will be referred to the Head of HR and the Ethics and Compliance Hotline.

Implementation of this policy shall be achieved through leadership, planning, delivery, review and reporting. Objectives and targets will be set in key areas as a focus for continual improvement.

July 2023

Paul Bresnan (MWH Treatment Chief Executive Officer)
Signed for and on behalf of MWH Treatment Limited

- Business Ethics Policies
 - The Principles policy states zero tolerance to Modern Slavery and expects the same of our supply chain.
- Migrant Workers Policy
 - Our Migrant Workers Policy includes details on the employment checks required.
- Whistleblowing Policy
 - The policy provides an explanation on the meaning of whistleblowing; encourages employees and others who have serious concerns to voice them; and details how confidentiality is ensured, concerns can be raised, and how MWH will address them.

DUE DILIGENCE PROCESSES

MWH Treatment has an integrated approach to modern slavery which covers our operations and extends to our supply chain. Our anti-modern slavery approach has been assessed by the Slave Free Alliance to determine suitability and improvements. In conclusion, we were able to demonstrate commitment to measuring the effectiveness of, and continually working to further strengthen and enhance our approach to tackling modern slavery.

MWH Treatment have a well-established recruitment and selection process, undertakes audits on the process, and checks on employee data to identify potential indicators of modern slavery. We have assessed the trade labour recruitment agencies we use on anti-modern slavery and right to work approaches.

We ensure, through our supplier selection and evaluation process, we only engage with approved suppliers and subcontractors who adhere to the Modern Slavery Act. During 2021 the MWH Treatment Supplier Assessment Questionnaire was revised to incorporate more detailed questions on modern slavery approaches and right to work checks. Training has been provided to procurement and environmental teams on how to evaluate the supplier questionnaire. Following the assessment, supply chain members can only be approved once they become signatories to our Sustainable Supply Chain Charter, which includes zero tolerance to slavery and human trafficking.

Supplier Terms and Conditions ensure suppliers are obliged contractually to inform us as soon as they become aware of any instance of modern slavery or human trafficking taking place in their business or supply chain. Sub-contracts for MWH Treatment direct works include detailed modern slavery and right to work clauses.

During 2021 and 2022, Slave Free Alliance were employed to undertake Modern Slavery Threat Assessments on six civils subcontractors and labour providers. This included a head office interview with senior management and two construction site visits for worker interviews. No modern slavery issues were found; however, this highlighted the need for further communication of modern slavery on our construction sites to all subcontractors. We are undertaking further worker interviews on our construction sites during 2023.

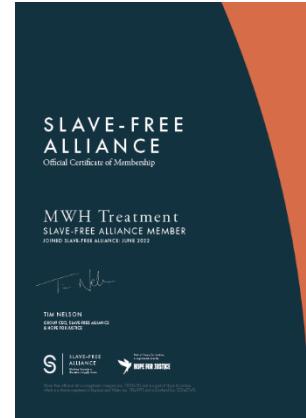
IDENTIFYING, ASSESSMENT AND ADDRESSING RISK

We periodically review our supply chain for risks associated with modern slavery and wider worker exploitation. As a construction contractor, we have identified the potential risk sectors in our supply chain: Sub-contractors; Labour providers; PPE suppliers; Waste Management; Cleaning providers. The risks were reviewed by the MWHT Anti-Modern Slavery Working Group during 2021 and it was agreed, during 2022, these risks were still appropriate.

MWH Treatment are a signatory of the Construction Protocol led by the Gangmasters and Labour Abuse Authority (GLAA) which is a voluntary information sharing agreement with the GLAA. Our employees attend GLAA and the Greater Manchester Modern Slavery Business Network organised events. These enable the ongoing assessment of modern slavery risks with knowledge sharing and awareness of wider worker exploitation.

In 2022 MWH Treatment became a member of the Slave Free Alliance. Membership with Slave-Free Alliance is a long-term partnership to build the business understanding of modern slavery, share this understanding across our value chain and develop a holistic response to address the risks. This involves sharing best practice and taking part in events and webinars.

In late 2020, MWH Treatment became a signatory of the Supply Chain Sustainability School 'People Matters Charter' which includes obligations for identifying and reporting issues of labour exploitation. As a business we are already fulfilling these obligations.



MWH Treatment has a third-party whistleblowing helpline which is incorporated into the formal modern slavery escalation process, which was updated in 2021 to provide greater emphasis on victim support. The process details the steps to be taken in the event of modern slavery being identified or reported, including collaboration with authorities and charitable organisations to ensure safeguarding. The escalation process is also accompanied by a guidance note which includes details of the support provided (internally and externally).

TRAINING AND COMMUNICATION

To raise awareness and ensure an appropriate level of understanding of the risks of Modern Slavery and human trafficking in our sector, we have provided the following training to personnel across the business:

- Specific Site Managers Awareness Training
- Procurement Team Awareness
- Safety, Environmental and Quality Team Awareness
- Modern Slavery Awareness (e-learning)
- Supplier Sustainability Evaluation

Modern slavery awareness is included in our construction site induction, with detailed content available in 6 different languages. A Toolbox Talk is available for all construction sites and in 2021 was distributed to all our construction sites as October SHEQ Theme of the Month as part of Anti-Slavery Day communications. Posters highlighting the issues of modern slavery and the whistleblowing helpline are included as standard in the construction site set up packs, for display in the site welfare facilities, as well as our offices.



In 2021 it was decided that Modern Slavery Awareness training was required for all employees. An internally developed e-learning module was assigned to coincide with Anti-Slavery Day on the 18th of October 2021. As of 31st March 2023, 96.7% of employees have completed the course. This course will continue to be assigned to all new starters during FY2024 and a three-year refresher requirement is in place.

In early 2022 MWH Treatment became a [partner of the Supply Chain Sustainability School](#). As a partner we help set the strategic direction of the school and identify key issues to address, new

training to develop, workshop and conference content. Through the School, our supply chain are able to access free workshops and e-learning modules, including modern slavery. In October 2022 we held a 'Due Diligence in Combatting Modern Slavery' Workshop, delivered by the Supply Chain Sustainability School for employees (in procurement, SHEQ and commercial departments) and supply chain members (high risk civil sub-contractors and labour agencies).

KEY PERFORMANCE INDICATORS

We received no reports from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in our business or our supply chain.

- Requirement for 90% of all employees to undertake an internally developed e-learning Modern Slavery Awareness training module. As of 31st March 2023, 96.7% of employees have completed the course.
- To hold worker interviews on at least four MWH Treatment construction sites. These interviews will be undertaken by the Slave Free Alliance.

This Statement will be reviewed and published annually.

PAUL BRESNAN

Chief Executive Officer

Dated 13 July 2023

The MWH companies registered in the UK are:

MWH UK Acquisitions Limited. Registered in England No. 11652932.
MWH Treatment Limited. Registered in England No. 01535477.
MWH Farrer Limited. Registered in England No. 05728436.
MWH Constructors Limited. Registered in England No. 11493725.
MWH Limited. Registered in England No. 11493983.

Registered office of all the above: Spring Lodge 172 Chester Road, Helsby, Cheshire, England, WA6 0AR