

**MODERN SLAVERY ACT 2015 STATEMENT FOR APRIL 2025****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 and labour exploitation. We are committed to taking all steps to try and eradicate modern slavery and human trafficking from our organisation and supply chains.

This statement is signed by Paul Bresnan, MWH Treatment Chief Executive, 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. 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, construction, commissioning and operations.

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.

**GOVERNANCE**

The Chief Executive is responsible for the overall business approach to anti-slavery. Within MWH Treatment, the anti-slavery approach is led by both the Legal Director and the Head of Sustainability and Environment, who sit on the Business Leadership Team (BLT). The BLT provides insight and leadership for the business, developing company strategy, principles and policies.

The business anti-slavery approach is continually developed through consultation and actions of the Anti-Slavery Working Group, which meets several times a year. This Group comprises of a broad representation of the business including legal, sustainability, procurement, human resources, recruitment and commercial. The purpose of the Group is to ensure that the risks of modern slavery are understood, these risks are mitigated and awareness raised at all levels.

## 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 aim to eliminate slavery and human trafficking. All our policies are reviewed on an annual basis. In April 2024 a new Human Rights Policy Statement was issued covering MWH Treatment's activities.

- 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.
- Human Rights Policy
  - Our Human Rights Policy covers the business commitment to respecting human rights, to avoid infringing on the rights of others and to address these impacts where they occur.
- Anti-Modern Slavery Policy Statement
  - Our Anti-Modern Slavery Policy Statement covers our company approach and the expectations on the supply chain.
- Business Ethics Policies
  - The 'Principles' policy states that MWH will not tolerate modern slavery and expects the same of its supply chain.
- Migrant Workers Policy
  - Our Migrant Workers Policy includes details on the employment checks required.
- Whistleblowing Policy
  - The Whistleblowing 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.
- Sustainable Procurement Policy
  - Our Sustainable Procurement Policy sets the standard for procurement activities across the business.



## DUE DILIGENCE PROCESSES

MWH Treatment has an integrated approach to modern slavery which covers our operations and extends to our supply chain. Our due diligence approach to managing the risk of modern slavery forms part of our broader efforts to respect and promote human rights. As a business we will be ensuring alignment with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisations (ILO's) Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-Operation and Development's (OECD) Guidelines for Multinational Enterprises. MWH Treatment have also become a signatory of the UN Global Compact in 2024 and have adopted the principles.

MWH Treatment has 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 on anti-modern slavery and right to work approaches.

We ensure, through our supplier selection and evaluation process, engagement of only approved suppliers and subcontractors. The MWH Treatment Supplier Assessment Questionnaire incorporates detailed questions on modern slavery approaches and right to work checks. Training has been provided to the procurement department and the sustainability and environmental team 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 commitments regarding due diligence in combatting modern 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.

Since 2021, Slave Free Alliance have been engaged to undertake Modern Slavery Site Assessments on our construction sites including assessments of subcontractors and labour providers, which includes worker interviews. During 2024 worker interviews were held on 5 construction sites (4 of these with Slave Free Alliance) and a total of 47 workers interviewed. These worker interviews are an important part of our approach to finding any potential risk of modern slavery on our sites, including consideration of the International Labour Organisation's indicators. All assessed sites were deemed low risk from a modern slavery perspective. Improvements have been identified, such as an increased focus during inductions and clarity on subcontractor reporting if a potential issue is identified. The improvements to address are documented in the Anti-Slavery Action Plan.

## **RISK ASSESSMENT AND MANAGEMENT**

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: Construction sub-contractors; Labour providers; PPE suppliers; Waste Management; Cleaning and Security providers. These reviews take into consideration Gangmasters Labour Abuse Authority (GLAA) Industry Profiles; knowledge from workshops, seminars and conferences attended; findings from the site and supply chain assessments; and through Slave Free Alliance membership. The management of these risks are incorporated into the Anti-Slavery Action Plan for the business.

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.





MWH Treatment has a third-party managed confidential whistleblowing helpline which is incorporated into the formal modern slavery escalation process, which focuses 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).

Measures to combat slavery have continued to be incorporated into our Integrated Management System (IMS) with numerous posters (including requirement for multi-lingual 'spot the signs' posters) on site, further development of the labour agency assessment process, including a new

Cleaning and Security company assessment; incorporation into the Project Sustainability and Social Value Plans, included modern slavery (multi-lingual) in the company standard Site SHEQ induction course and the induction assessment questionnaires. During 2024-2025, a new internal Modern Slavery and Human Rights Themed Audit was trialled on one of our construction sites. The trial proved successful and the Themed Audit has now been incorporated into the IMS.

## TRAINING AND AWARENESS

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:

- Modern Slavery Awareness (e-learning) for all employees
- Supplier Sustainability Evaluation
- Due Diligence workshops with procurement and commercial teams



Modern slavery awareness is included in our generic construction site induction, covering 5 different languages and in the induction assessment questionnaires. A 'Modern Slavery in Construction' Toolbox Talk is available and is re-issued annually to our construction sites. In April 2024, MWH Treatment issued a Theme of the Month on 'Modern slavery and how to address it on our construction sites'. This included a new Toolbox Talk on Whistleblowing as well as spot the signs posters in Polish, Punjabi, Hindi, Romanian and Lithuanian. Some of these posters were provided in conjunction with the charity Hope for Justice, through our membership with Slave Free Alliance.

In October 2024, as part of Anti-Slavery Day, we issued internal communications to all employees addressing modern slavery as a global issue and what MWH Treatment are doing to help combat it. This included links to videos, spot the signs multi-lingual posters and the escalation process. Posters were

developed for the communications covering 'Exploitation Explained' and 'It's a Fact'. In addition, the MWH Treatment Head of Sustainability and Environment presented on an RSK Group webinar providing a case study on the company's anti-slavery approach.

We continue to include posters highlighting the issues of modern slavery and the whistleblowing helpline as standard in the construction site set up packs (including multi-lingual posters), for display in the site welfare facilities as well as our offices. Anti-Slavery day communications were sent to our supply chain which included: details on our anti-slavery approach; the findings from



our on-site worker interviews; what our supply chain could do (e.g. links to SCSS resources); details of our whistleblowing helpline.

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 in 2021. This was updated in 2023. As of 31<sup>st</sup> March 2025, 91.2% of employees have completed the course. This course will continue to be assigned to all new starters during FY2026 and a three-year refresher requirement is in place.

In early 2022 MWH Treatment became a [partner of the Supply Chain Sustainability School](#) (SCSS). 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. MWH Treatment attend the SCSS Modern Slavery Leadership Group and provide feedback on the development of resources provided through the School.

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). In February 2024 we held a half-day company workshop, delivered by the Supply Chain Sustainability School, on 'Using Procurement & Supply Chain Management to Combat Modern Slavery'. This was attended by procurement, commercial and SHEQ representatives and covered case examples, supply chain mapping and due diligence.



## KEY PERFORMANCE INDICATORS

During Financial Year 2024-2025 we have 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.

For FY2024-2025 the following progress has been made on the KPIs:

- Requirement for 90% of all employees to undertake an internally developed e-learning Modern Slavery Awareness training module. *As of 31<sup>st</sup> March 2025, 91.2% of employees have completed the course.*
- To produce a Human Rights Policy Statement for MWH Treatment. *This was issued in April 2024.*
- To develop a specific supply chain assessment process for cleaning and security companies (as identified as high risk from a modern slavery and workers' rights perspective). *This was developed in FY2024 and fully implemented within the business.*
- To become a participant of the Supply Chain Sustainability School Modern Slavery Leadership Group. *Attended the quarterly meetings throughout FY2025.*
- To hold worker interviews on at least six MWH Treatment construction sites. *Slave Free Alliance completed worker interviews on four construction sites and an internal Modern Slavery and Human Rights Themed Audit was undertaken on one of our construction sites.*

For FY2025-2026 the following KPIs have been set:

- Requirement for 90% of all employees to undertake an internally developed e-learning Modern Slavery Awareness training module.
- To develop a Human Rights and Anti-Slavery Manual, in alignment with the British Standard BS 25700 for Organizational Responses to Modern Slavery.
- To attend and support the Supply Chain Sustainability School Modern Slavery Due Diligence Capability Assessment Workshops through FY2025-2026.
- To hold worker interviews on at least six MWH Treatment construction sites. These interviews will be undertaken by the Slave Free Alliance or internally by an appropriately experienced person.

This Statement will be reviewed and published annually.

**PAUL BRESNAN**

**Chief Executive**

Dated 30<sup>th</sup> May 2025

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