

---

**MODERN SLAVERY ACT 2015 STATEMENT FOR APRIL 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 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, 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. 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.

**GOVERNANCE**

The MWH Treatment Chief Executive is responsible for the overall 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 Senior Leadership Group (SLG). The SLG 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 at least quarterly. 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. For 2024 a new Human Rights Policy Statement is being developed.

- 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.
- 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 due diligence approach to managing the risk of modern slavery, during 2024, will form 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 adopted the principles of the UN Global Compact.

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 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. The MWH Treatment Supplier Assessment Questionnaire incorporates 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 no practice of 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.

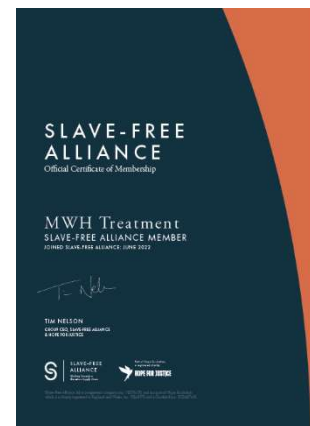
Since 2021, Slave Free Alliance have been engaged to undertake Modern Slavery Threat Assessments on our construction sites including assessments of subcontractors and labour providers, which includes worker interviews. During 2023 worker interviews were held on 4 construction sites with a total of 80 workers interviewed.

**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. The risks are reviewed by the MWHT Anti-Modern Slavery Working Group, at least annually, taking 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.

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 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 with numerous posters (including requirement for multi-lingual 'spot the signs' posters) on site, further development of the labour agency assessment process, trial of a new Project Sustainability and

Social Value Plan, and incorporation of modern slavery into the Site SHEQ induction course and induction assessment questionnaires.

## 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:

- Specific Site Managers Awareness Training
- Procurement Team Awareness
- Safety, Environmental and Quality Team Awareness
- Modern Slavery Awareness (e-learning)
- Supplier Sustainability Evaluation
- Due Diligence workshops with procurement and commercial teams



Modern slavery awareness is included in our generic construction site induction, including in 5 different languages, and induction assessment questionnaires. A 'Modern Slavery in Construction' Toolbox Talk is available for all construction sites and is re-issued annually to our construction sites. At the end of March 2024, for the MWHT Theme of the Month on modern slavery and whistleblowing - a new Toolbox Talk on Whistleblowing was issued 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 the Slave Free Alliance.

In October 2023, as part of Anti-Slavery Day we promoted a series of posters covering 'Do You Know', 'Get the Facts', and 'Modern Slavery and Climate Change'. 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.

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 18<sup>th</sup> of October 2021. This was reviewed during March 2023, updated and reissued. As of 31<sup>st</sup> March 2024, 96% 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).

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. The learnings from the training are to be applied to the Integrated Management System and within procurement, regarding supply chain mapping.

---

**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 31<sup>st</sup> March 2024, 96% of employees have completed the course.
- To produce a Human Rights Policy Statement for MWH Treatment.
- 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).
- To become a participant of the Supply Chain Sustainability School Modern Slavery Leadership Group.
- To hold worker interviews on at least six 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**

Dated 15<sup>th</sup> April 2024

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