

## MODERN SLAVERY ACT STATEMENT

### INTRODUCTION

MWH opposes Modern Slavery and understands the specific risks faced by the construction sector as a target industry for human trafficking. MWH is therefore determined to raise awareness among our people and supply chain, and apply robust procedures and processes to prevent Modern Slavery.

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

### OUR BUSINESS

MWH 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. MWH directly employs over 1000 people and places orders annually with an aggregate value of more than £500m. Working primarily within the UK, MWH applies its skills to provide a full range of start-to-finish construction services and asset management, including design, engineering, procurement and construction, commissioning, operations, data collection and leakage detection.

### EMPLOYMENT

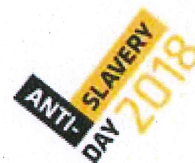
MWH verifies that all direct employees have the right to work in the UK via our internal onboarding processes. During this process, all employees are made aware of their working hours, leave and absence entitlements and other employee benefits.

### TRAINING AND RAISING 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
- Supply Chain Awareness

On UK Anti-Slavery Day (18th October 2018), MWH hosted a Modern Slavery Awareness Supply Chain Event. This was facilitated by a third party, the charity Hope for Justice, with the aim of raising awareness and sharing best practice.



The event was attended by supply chain members from high risk sectors and internal personnel from procurement, health, safety, environmental, quality and HR personnel.

## POLICIES

MWH 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.

- 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 approach to being responsible by concentrating on key areas: employees; stakeholders; environment; communities; communication and governance.
- 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 is being rewritten to reflect the progress being made within the business in addressing Modern Slavery, and our company requirements and expectations on the supply chain.
- Speak Up Policy (whistleblowing)
  - Our Whistleblowing procedure allows any employee or third party to raise a concern anonymously.
- Supply Chain Charter
  - All evaluated Suppliers and Subcontractors are required to sign our Sustainable Supply Chain Charter as part of our Pre-Qualification process.
- Code of Business Conduct Policy

## SUPPLY CHAIN

MWH uses more than 2,000 suppliers and subcontractors to support our business across the UK. Our supply chains include professional service firms, subcontractors and suppliers of services, goods, plant and equipment.

We ensure through our supplier selection and evaluation process we only engage with approved suppliers and subcontractors who adhere to the Modern Slavery Act. Approved suppliers and subcontractors must also become signatories to our Sustainable Supply Chain Charter.

With the assistance of a third-party, Hope for Justice, we identified high risk suppliers and prioritised them for specific Modern Slavery threat assessments. Categories assessed so far include recruitment of agency staff, waste management and Personal Protective Equipment (PPE) providers.





Our work with Hope for Justice granted us the opportunity to reflect upon our internal processes. This has helped us in strengthening our approach to the pre-qualification process and on-going management of agency labour providers.

We use standard Subcontracts and Purchase Order Terms and Conditions to ensure our contract terms require our supply chain to comply with all modern slavery and human trafficking laws.

### **MODERN SLAVERY WORKING GROUP**

We are committed to the aim of taking all reasonable steps to try and eradicate Modern Slavery or human trafficking from our business and supply chains. We have formed a Modern Slavery Working Group with representatives from procurement, operations, health & safety, environment & sustainability, legal and human resources. The team will analyse and improve existing processes and establish a framework to monitor internal compliance as well as our supply chain's compliance.

The working group will:

1. Champion our drive to eradicate Modern Slavery or human trafficking
2. Manage and lead continuous improvement of our Anti-Modern Slavery Action Plan
3. Undertake audits of our supply chain
4. Provide training to key employees and members of the supply chain
5. Work with our agency staff providers to ensure at least minimum wages are paid and that no tie-in, finders fee or service charges exist
6. Undertake spot checks on Modern Slavery Act compliance during supply chain audits and inspections
7. Ensure appropriate Terms and Conditions across our suite of contracts.

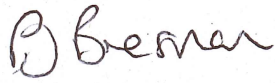
### **CONTINUAL IMPROVEMENT**

As part of our continual improvement the following steps are to be undertaken as part of our Anti-Modern Slavery Action Plan:

- Review of our Integrated Management System and business processes to continually improve to ensure a robust Anti-Modern Slavery approach.
- Incorporate Modern Slavery into Safety, Quality and Environmental on-site audits and inspections.
- To develop an internal Modern Slavery Awareness training module for employees and to share with the supply chain.
- Establish an escalation process to deal with Modern Slavery issues if any are identified.
- To undertake assessments on other high-risk categories within our supply chain.
- Ensure our supply chain are obliged contractually to inform MWH as soon as they become aware of any instance of Modern Slavery or human trafficking taking place in their business or supply chain.

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This Policy Statement will be reviewed and published annually.



**PAUL BRESNAN**

**Managing Director**

Dated 19<sup>th</sup> December 2018

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.  
Stantec Treatment Limited. Registered in England No. 11493460.  
Stantec Farrer Limited. Registered in England No. 11493916.

Registered office of all the above: Soapworks, Colgate Lane, Salford M5 3LZ