

MODERN SLAVERY ACT 2015 STATEMENT FOR 2020

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, Managing Director, 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, data collection and leakage detection.

MWH Treatment uses more than 2,000 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 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 was rewritten and issued during 2019 to reflect the progress being made within the business in addressing Modern Slavery, our company requirements and the expectations on the supply chain.



- Business Ethics Policies
 - The Principles policy states zero tolerance to Modern Slavery and expects the same of its supply chain.
- Migrant Workers Policy
 - Our Migrant Workers Policy, issued in 2019, includes details on the employment checks required.
- Whistleblowing Policy
 - The policy, first issued during 2019, 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 Treatment 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. During 2020, our anti-modern slavery approach was 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. However, it was raised that our due diligence does not sufficiently extend to second tier subcontractors. The recommendations made have been incorporated into our 2021-22 Modern Slavery Action Plan.

MWH Treatment have a well-established recruitment and selection process and undertakes audits on the process and checks on employee data to identify potential indicators of modern slavery. During 2020 we 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. Following the assessment, supply chain members can only be approved once they become signatories to our Sustainable Supply Chain Charter. 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. Last year, practical guidance for the supply chain on how to understand and address modern slavery was produced, this is due to be communicated during 2021.

During 2021 we plan to:

- Communicate with our main sub-contractors and suppliers with regards to modern slavery awareness.
- Revise the Supplier Assessment Questionnaire to ask more in-depth questions addressing modern slavery.
- Undertake Modern Slavery Threat Assessments on the top 5 high risk sub-contractors.
- Provide further guidance within the organisation on the modern slavery escalation process and victim support options.

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 risk assessment will be repeated in 2021.

Independent Modern Slavery Threat Assessments were undertaken during 2018/19 to gain a deeper understanding of risk and mitigating requirements. We have identified a potential risk in the supply chain of subcontractors. We therefore intend to complete a due diligence exercise that extends to our second-tier subcontractors.

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 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 hotline which is incorporated into the formal modern slavery escalation process, which was finalised during 2020. 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.

TRAINING AND COMMUNICATION

Since 2018, 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
- Supply Chain Awareness

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. Posters highlighting the issues of modern slavery and the whistleblowing hotline are included as standard in the construction site set up packs, for display in the site welfare facilities, as well as our offices.



We have identified the specific job roles where modern slavery awareness training is mandatory. This includes site and project management, procurement, human resources, SHEQ, legal and commercial. In 2021, a Modern Slavery Awareness online e-learning module will be developed and issued throughout the organisation.

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.

The following KPIs will be actioned during 2021:

- Requirement for 100% of our identified employees to undertake an internally developed e-learning Modern Slavery Awareness training module.
- Modern slavery threat assessments to be undertaken on five of our highest risk sub-contractors.

This Statement will be reviewed and published annually.



PAUL BRESNAN

Managing Director

Dated 28 January 2021

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: Soapworks, Colgate Lane, Salford M5 3LZ