MODERN SLAVERY ACT 2015 STATEMENT FOR JANUARY 2021 – MARCH 2022

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 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 managing through six pillars: health, safety and wellbeing; environment; net zero carbon; business processes and quality; inclusion and ethical practices; and community.
- 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

Anti-Modern Slavery

MWH Treatment Limited

Policy Statement

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

MWH Treatment has a zero-tolerance policy regarding Modern Slavery and expects the same of its supply chain. We are committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chain. Our approach will be through:

Governance
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 management system, with governance from the Anti-Modern Slavery Working Group.

Communication and Awareness
We communicate throughout our organisation to ensure awareness of Modern Slavery and provide guidance for employees, with detailed training for those in roles with the potential to encounter Modern Slavery.

Employees
We believe in treating 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.

Supply Chains
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 supply chain to develop relationships and ensure collaboration.

Our requirements will be embedded within our procurement processes including our supplier evaluation procedure, which consists of Modern Slavery Act and Right to Work compliance checks. All assessed members of our supply chain are required to be signatories to our Sustainable Supply Chain Charter.

We will undertake risk-based threat assessments and audits on our supply chain with regards to Modern Slavery. 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 at all levels, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives and business partners. Any suspected violation of this Policy by an MWH employee or those acting on our behalf are to be reported to the Ethics and Compliance Hotline.

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

January 2019

Paul Bresnan (MWH Treatment Managing Director)
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 Supplier Assessment Questionnaire was revised to incorporate more detailed questions on modern slavery approaches and right to work checks. Training was 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.

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, Slave Free Alliance were employed to undertake a Modern Slavery Threat Assessment on a civils labour provider. This involved a head office interview with senior management and worker interviews on our construction site. 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 intend to undertake further assessments on civils labour providers and subcontractors during 2022.

During 2022 we plan to:

- Share best practice and guidance with our main sub-contractors and suppliers with regards to modern slavery awareness. This is to be undertaken through the MWH Treatment partnership with the Supply Chain Sustainability School.
- Undertake Modern Slavery Threat Assessments on high-risk civils sub-contractors in collaboration with Slave Free Alliance.
- Train MWH Treatment mental health first aiders on identifying the signs of Modern Slavery.

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 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.

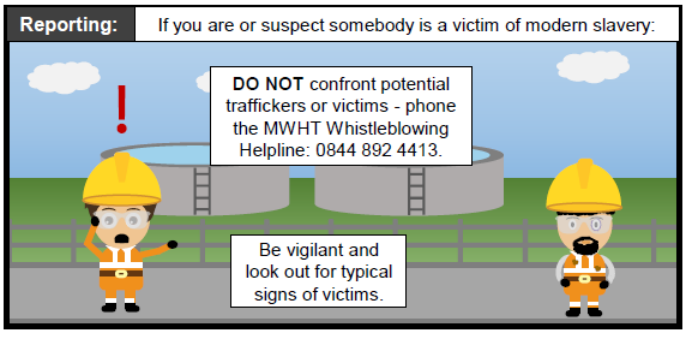
In late 2020, MWH Treatment became a signatory of the Supply Chain Sustainability School 'People Matters Charter' which includes obligations for identifying and reporting issues of labour exploitation. As a business we are already fulfilling these obligations.

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 October 2021. As of 31st March 2022, 91.3% of employees have completed the course. This course will continue to be assigned to all new starters during 2022 and a three-year refresher requirement has been established.

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 2022, 91.3% of employees have completed the course.
- Modern slavery threat assessments to be undertaken on five of our highest risk sub-contractors. MWH changed its plan for undertaking assessments and decided to use Slave Free Alliance to both complete these and to assist us in developing internal capability. MWH will undertake further assessments during 2022 in conjunction with Slave Free Alliance.

This Statement will be reviewed and published annually.



PAUL BRESNAN

Chief Executive Officer

Original dated 24 February 2022

Updated 30th September 2022

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