

# Anti-Modern Slavery

## MWH Treatment Limited

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 tacking 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 MWHT 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.

Pobesnan January 2019

**Paul Bresnan** (MWH Treatment Managing Director)
Signed for and on behalf of MWH Treatment Limited

Policy Statement