

MODERN SLAVERY ACT STATEMENT**INTRODUCTION**

MWH Treatment opposes Modern Slavery and understands the specific risks faced by the construction sector as a target industry for human trafficking. MWH Treatment is committed to taking all steps to try and eradicate Modern Slavery or human trafficking from our business 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 BUSINESS

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. MWH Treatment directly employs over 1000 people and places orders annually with an aggregate value of more than £500m. Working primarily within the UK, MWH Treatment applies its 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.

EMPLOYMENT

MWH Treatment verifies that all direct employees have the right to work in the UK via our internal onboarding processes, which is based upon the Home Office Right to Work Checklist. 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
- Safety, Environmental and Quality Team Awareness
- Supply Chain Awareness

POLICIES

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.

- 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.
 - Whistleblowing policy which allows any employee or third party to raise a concern anonymously.
- Migrant Workers Policy
 - Our Migrant Workers Policy, issued in 2019, includes details on the employment checks required.
- Supply Chain Charter
 - All evaluated Suppliers and Subcontractors are required to sign our Sustainable Supply Chain Charter as part of our Pre-Qualification process.



SUPPLY CHAIN

MWH Treatment 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.

During 2018, with the assistance of a third-party, Hope for Justice, we identified high risk suppliers and prioritised them for specific Modern Slavery threat assessments.

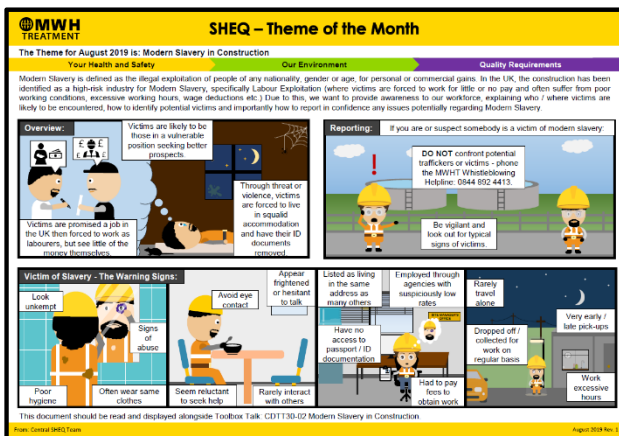
Categories assessed so far include recruitment of agency staff, waste management and Personal Protective Equipment (PPE) providers.

Our work with Hope for Justice granted us the opportunity to reflect upon our internal processes. During 2019 we strengthened our approach to the company pre-qualification process and on-going management of agency labour providers and subcontractors through:

- New recruitment agency assessment process which includes modern slavery and right to work.
- Revised approach to assessing framework subcontractors undertaking higher risk activities with regards to modern slavery. This includes an additional level of checks in association with the standard pre-qualification process.
- Modern slavery checks have been incorporated into the SHEQ audit process, with guidance produced on how to undertake a supply chain Modern Slavery Threat Assessment.
- Supplier Terms and Conditions amended to ensure suppliers are obliged contractually to inform MWH Treatment as soon as they become aware of any instance of modern slavery or human trafficking taking place in their business or supply chain.

Communication

During 2019 communication to the wider workforce was a key element in strengthening the MWH Treatment anti-modern slavery approach. A Toolbox Talk was issued to all the construction sites with posters highlighting the issues of modern slavery and the whistleblowing hotline. These posters are now included as standard in the construction site set up packs to be displayed on our construction sites. In addition, the SHEQ Theme of the Month for August 2019 concentrated on Modern Slavery. This was communicated to the entire business and was well received, it pictorially demonstrated the issue of modern slavery, signs to look out for and reporting.



A new third party provider of the Whistleblowing Hotline was established during 2019 with a new escalation process in the event of a potential modern slavery incidence being reported.

GOVERNANCE

During 2019, MWH Treatment became a signatory of the Construction Protocol led by the Gangmasters and Labour Abuse Authority (GLAA). This is a voluntary information sharing agreement with the GLAA.


The MWH Treatment Modern Slavery Working Group continued to meet during 2019. Representatives from procurement, SHEQ (safety, health, environment and quality), sustainability, legal and human resources were in attendance. This is led by the Legal Director and the team analyse, identify and work within the business to improve existing processes.

CONTINUAL IMPROVEMENT

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

- Our anti-modern slavery approach to be audited by the Slave Free Alliance, to identify further improvements in our processes.
- Setting a Key Performance Indicator for achieving 80% of identified employees completing the modern slavery awareness training.
- Revision of subcontracts to increase the emphasis on anti-modern slavery.
- To produce guidance for our supply chain on modern slavery and our expectations.
- Further incorporation of 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.
- To undertake assessments on our trade labour recruitment agency framework (the framework is currently being finalised).
- To undertake modern slavery Threat Assessments on high risk subcontractors.

This Policy Statement will be reviewed and published annually.

**PAUL BRESNAN****Managing Director, Executive Vice President**

Dated 4th February 2020

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