

# Coliban Water

## Modern Slavery Statement 2021/22



*This Policy Statement recognises that the region's Traditional Owners have been the custodians of the land and water for thousands of generations. Coliban Water acknowledges that Traditional Owners have unique knowledge and connection to this land and water. We actively seek strong partnerships with Traditional Owners so that our decisions are better informed to help deliver the goals and aspirations that they hold for their culture and country.*

### **Coliban Water's Modern Slavery Statement**

The Modern Slavery Statement is provided as a statement under section 14(1) of the Modern Slavery Act 2018 (Act) for the period from 1 July 2021 to 30 June 2022 (statement) for Coliban Water ACN 149 633 116.

### **Coliban Water's Commitment to the Modern Slavery Act 2018**

Coliban Water is taking a proactive approach to the management of modern slavery risk by increasing the levels of transparency in our operations and supply chains and working collaboratively with stakeholders, industry and suppliers.

Coliban Water is committed to ensuring that there is no form of modern slavery or human trafficking within our organisation or supply chains. Coliban Water seek to ensure that its staff and supply chains are not subject to behaviour or threats that may amount to modern slavery.

We are also committed to ensuring that our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with Coliban Water's disclosure obligations under the Modern Slavery Act 2018.

This statement sets out actions undertaken in 2021/22 to mitigate the risk of modern slavery in our business and to ensure that in so far as possible, our suppliers hold the same ethos.

Coliban Water's commitment to tackling modern slavery was first demonstrated through our participation in the VicWater Social Procurement Working Group (VSPWG) in order to adequately prepare us to meet requirements under the Act. The VSPWG provided an opportunity to share resources, lessons learned and standardise expectations and processes for suppliers in order to mature the industry-wide responses to modern slavery.

The VSPWG worked together to develop tools for application with the ambition to take an industry-leading position in how Water Corporations responsibly manage operations and supply chains. The water industry resources that have been developed and shared include but are not limited to:

- VicWater member education material;
- Labour Rights and Modern Slavery risk identification tool;
- Supplier education material;
- Supplier questionnaire and guidance;
- Supplier continuous improvement guidance;
- Supplier compliance checklist; and
- Grievance and remediation guidance.

These resources have been utilised in 2021/22 and will continue to be utilised as required into the future to manage Modern Slavery Risk.

### **Coliban Water's Structure, Operations and Supply Chains**

Coliban Region Water Authority was established on 1 July 1992 under the Water Act 1989 (Vic) as a Regional Urban Water Authority. The Authority became the Coliban Region Water Corporation on 1 July 2007 and operates as Coliban Water. Our shareholder is the Victoria Government. Our responsible Minister for the period of 1 July 2021 until 30 June 2022 was:

- The Hon. Harriet Shing MP, Minister for Water, 27 June 2022 to 30 June 2022
- The Hon. Lisa Neville MP, Minister for Water, 1 July 2021 to 26 June 2022
- The Hon. Richard Wynne MP, Acting Minister for Water, 1 July 2021 to 22 August 2021

Coliban Water's core business is providing safe drinking water, sewerage and rural water services for public health and environmental protection so that the communities we serve can sustain themselves.

We provide urban water and wastewater services in accordance with the provisions of Part 8- Water supply and Part 9- Sewerage of the Water Act 1989 (Vic). Rural customers are supplied under Part 4 Division 2 Section 51 of the Act.

Our services include:

- Water Harvesting
- Water Storage
- Water Treatment
- Water Distribution
- Urban wastewater collection
- Treatment, re-use and disposal, including trade waste
- Water purchase
- Recycled Water
- Rural water supply

The assets we manage to deliver our services include a net book value of infrastructure assets, property, plant and equipment of \$1.91 billion, covering:

- 396 kilometres of rural channels and pipelines
- 2050 kilometres of sewer mains
- 34 raw water reservoirs and service basins.
- 2379 kilometres of water mains (potable and non-potable)
- 182 wastewater pump stations
- 16 water treatment plants
- 73 water pump stations
- 147 kilometres of water distribution pipelines and channel system
- 1 recycled water factory
- 62 kilometres of recycled water infrastructure
- 16 water treatment plants
- 14 Water reclamation plants

### **Risks of Modern Slavery practices in Coliban Water's operations and supply**

The heat maps, risk scores and commentary produced by the completion of a supply chain risk assessment by the VSPWG identified that human rights risks, including modern slavery risks, have been identified across all six portfolios of typical water corporation procurement spend. The categories of spend within each of these portfolios that presented human rights risks are outlined below:

- Asset Maintenance portfolio: Ongoing operations and maintenance of facilities (including cleaning), grass cutting, herbicide application/edge treatment

- Construction portfolio: Construction labour (minor and major projects) and offshore engineering services
- Corporate portfolio: Temporary staff, labour hire and traineeship programs, security
- Customer portfolio: Debt collection services, customer research services
- Equipment and Material portfolio: Mechanical and electrical equipment, chemical products
- Information Technology Consulting portfolio: Offshore IT Services

Of these categories, offshore engineering and cleaning services presented high human rights risk, including modern slavery.

The introduction of mandatory State Purchase Contracts for specific groups of goods and services in January 2022 contributes to mitigating risk for Coliban Water in the areas of IT, temporary staff, and professional advisory services. When selecting a supplier from a State Purchase Contract, their compliance with the Supplier Code of Conduct is visible to the buyer.

#### Actions taken to assess and address these risks

We recognise that to eradicate modern slavery, dedication is required to make a difference to people's lives and as such we completed the following actions across the 2021/22 financial year:

Action	Status
Improved our processes: Embedded the principles of the Modern Slavery Act 2018 into our procurement policy, procedures and templates, including tendering templates.	Completed
Built our understanding and capabilities: Increased business wide awareness of modern slavery risks in our operations and supply chains by including Modern Slavery in our procurement induction processes, providing the VicWater member educational materials to our people, having targeted discussions where elevated risk may exist.	Completed
Enhanced engagement with our suppliers and partners: <ul style="list-style-type: none"> <li>• Built awareness and capability to manage Labour Rights and Modern Slavery Risk within our supply chain by providing the VicWater supplier education material to all of our existing suppliers in May 2022, requesting that they review their supply chains, map their own supply chains and consider a series of questions, and contact us for support where they have concerns;</li> <li>• Requested that all <u>existing</u> suppliers and partners formally commit to the Supplier Code of Conduct which describes the minimum expectations in the areas of: integrity, ethics and conduct; conflict of interest, gifts, benefits and hospitality; corporate governance; labour and human rights; health and safety; and environmental management; and</li> <li>• Introduced a mandatory step for all <u>new</u> Coliban Water suppliers to both review the Modern Slavery educational materials, formally commit to the Supplier Code of Conduct, consider their Modern Slavery risk and contact us if they have any concerns about their supply chain.</li> </ul>	Completed

Ongoing actions include:

Action	Status
Employment policies at Coliban Water help to ensure all recruitment policies are consistent, applied fairly and reduce the risk of modern slavery for our people.	Ongoing

Action	Status
All organisational policies are assessed for against the Human Rights Act 2006, prior to being applied.	Ongoing
Modern Slavery is included in employee inductions as well as our procurement procedures and templates, including tendering templates.	Ongoing
Continuous collaboration with suppliers throughout our relationship is important for building trust and transparency, and reducing the risk of negative impacts to people in our supply chains.	Ongoing

The following actions are proposed over the next two financial years:

Action	Target Date
Work with existing major contractors to implement policies and procedures, mitigate potential risks and deal with grievances.	30 June 2023
Communicate with suppliers (potentially via survey) regarding how they are managing their own Modern Slavery risks.	30 June 2024
Continue to provide Modern Slavery education to all new Coliban Water suppliers and employees.	Ongoing through to 30 June 2024

#### Assessment of the effectiveness of these actions

The establishment of the VSPWG as a community of practice enabled increased transparency and knowledge-sharing between Victorian water corporations from the early stages. By collectively identifying and addressing common sustainability issues, including human rights, and working together to capture opportunities, the VSPWG was more rapidly able to determine which actions were consistently effective in reducing risk and achieving their desired outcomes. By bringing the Victorian water corporations together, a level of accountability to each other was introduced which contributed to the progress of initiatives, setting the VSPWG up for a culture of continuous reflection and improvement.

Coliban Water's intent in 2021/22 was to mitigate risk by building the modern slavery capability of our suppliers and the individuals involved in making procurement decisions and managing relationships with suppliers. The use of the VSPWG toolkit to provide educational materials and provide a resolution process for grievances proved to be valuable and was well received. No instances of potential risk have been communicated to Coliban Water which is a positive outcome, however as such, it is difficult to ascertain if our engagement or tools have been effective in practice. We are hopeful that our future actions, including a more targeted approach with our major contractors and further engagement with our suppliers will provide more insight into how they are managing their Modern Slavery risks and enable us to measure the effectiveness of our education and support processes.

#### Approval

This statement was approved by the Board of Coliban Water in their capacity as principal governing body of Coliban Water on 16 December 2022.

*Bob Cameron*

**Bob Cameron**  
Board Chairperson

**Date: 16 December 2022**