





ABOUT THIS DOCUMENT

Australia's Modern Slavery Act 2018 defines modern slavery as encompassing eight forms of serious exploitation:

- trafficking in persons,
- slavery,
- servitude,
- forced marriage,
- forced labour,
- debt bondage,
- deceptive recruitment for labour services,
- and the worst forms of child labour.

Goulburn Valley Water maintains a strong commitment to ethical sourcing and the prevention of modern slavery within its operations and supply chains. The organisation continues to strengthen its approach to identifying, assessing, and mitigating risks associated with modern slavery.

Following the initial modern slavery position statement, Goulburn Valley Water expanded its engagement with suppliers through a targeted self-assessment questionnaire. This initiative provided valuable insights into supplier practices and enabled a more comprehensive risk analysis across the supply chain.

The findings have informed the organisation's ongoing risk management strategies and highlighted opportunities for improvement and collaboration. Goulburn Valley Water remains focused on continuous improvement, transparency, and accountability in addressing modern slavery risks, and will continue to evolve its practices in alignment with regulatory expectations and industry standards.

ACKNOWLEDGEMENT OF TRADITIONAL OWNERS

We recognise Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. Their lore, traditions and customs nurture the land and water, creating wellbeing for all. Goulburn Valley Water operates on the lands of the Yorta Yorta and Taungurung, and we respectfully acknowledge them as the Traditional Owners of the land and water on which we rely.

We appreciate their ongoing connection to land, water and community and pay respect to their tribal Elders. We celebrate their continuing culture and respect the memory of their ancestors. We are committed to honouring Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual connections to land and water. They have managed water and land sustainably over thousands of generations, and we value their rich contribution to society and our region's future.



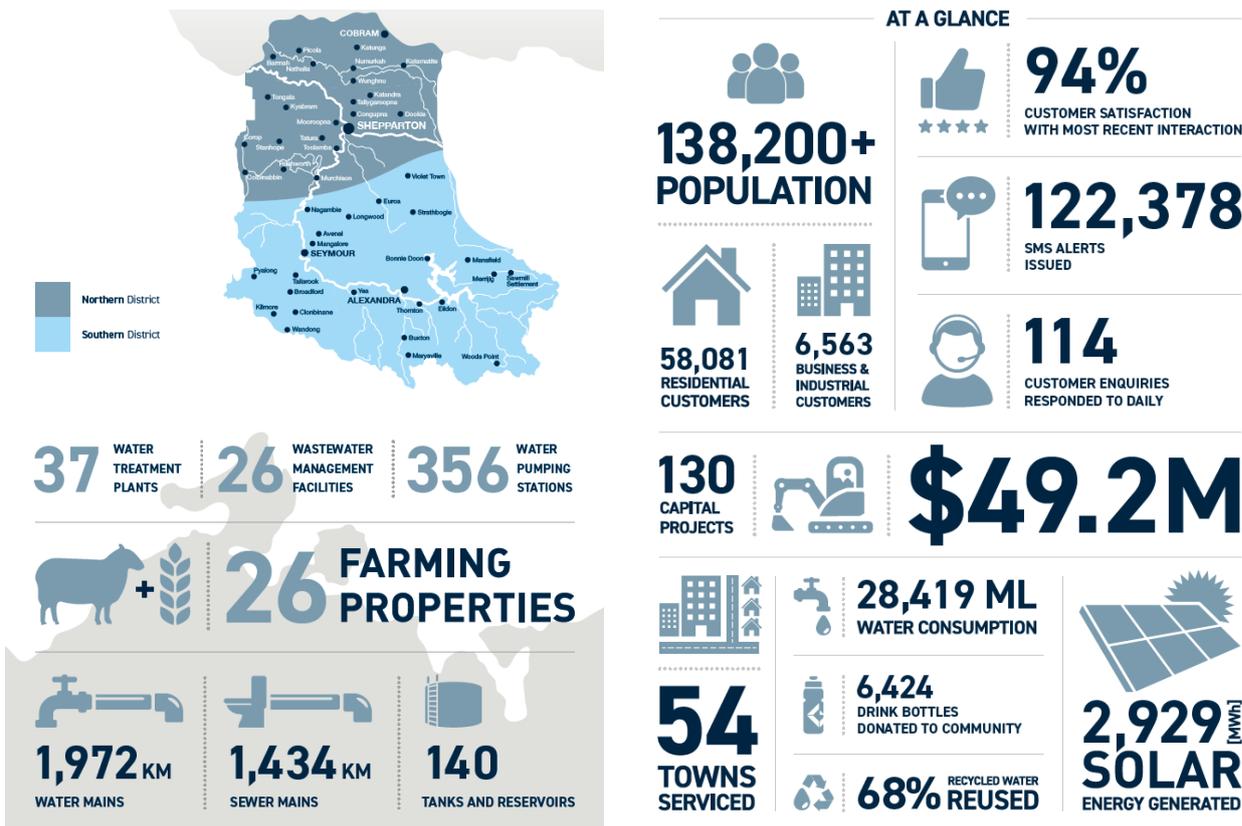
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ABOUT US

Goulburn Valley Region Water Corporation, trading as Goulburn Valley Water (GVW), is a state-owned Government Business Enterprise and statutory corporation reporting to the Minister for Water. The organisation operates under the *Water Act 1989* and the *Water Industry Act 1994*, and is subject to a range of regulatory obligations administered by the Department of Energy, Environment and Climate Action, Department of Treasury and Finance, Department of Health, and the Environment Protection Authority. Economic activities, including pricing and performance, are regulated by the Essential Services Commission, with additional obligations under the Energy and Water Ombudsman Victoria.

Goulburn Valley Water’s service area extends from Cobram on the Murray River in the north, to Kilmore in the south, Corop in the west, and Mansfield at the foot of the Alpine Ranges in the east. Within this region, the organisation is responsible for the collection, transportation, and treatment of sewage from residential and commercial customers, servicing more than 134,500 people across north-central Victoria.



As population growth and evolving community expectations continue to shape regional development, Goulburn Valley Water remains focused on strategic planning to support future growth and deliver positive social and environmental outcomes. These responsibilities also inform the organisation’s approach to managing modern slavery risks, ensuring that ethical and sustainable practices are embedded across all operations and supply chains.

OUR VISION AND VALUES

Our Core Promise

Goulburn Valley Water's purpose is to support healthy and prosperous communities by delivering reliable and affordable water and wastewater services to our customers.

Our Commitment

In delivering on this promise, we are committed to:

- fully understanding and delivering on our customers' preferences
- enhancing the liveability and economic wellbeing of our communities
- embracing diversity and inclusion, and providing leadership and opportunity

Our Strategic Priorities

In delivering the core promise and driving the evolution of the business, our key strategic priorities are:

- Customer Centricity
- Digital Optimisation
- Safety Culture
- Leadership and Diversity
- Carbon and Climate

Our Values

Our approach is underpinned and guided by our values. Every person at Goulburn Valley Water commits to these values in the way they approach their work and work with others.



- **Cause No Harm**

We put safety first, always. We care for our customers, the community and the environment.

- **One Team**

We believe working together achieves better outcomes.

- **Value Every Dollar**

We carefully manage every dollar we spend, how we manage and value our assets and equipment, and every hour we work.



- **Encourage Ideas**

We are curious and open minded. We innovate for the future.

- **Own Our Actions**

We are professional, we act ethically and take personal ownership of our decisions and actions.

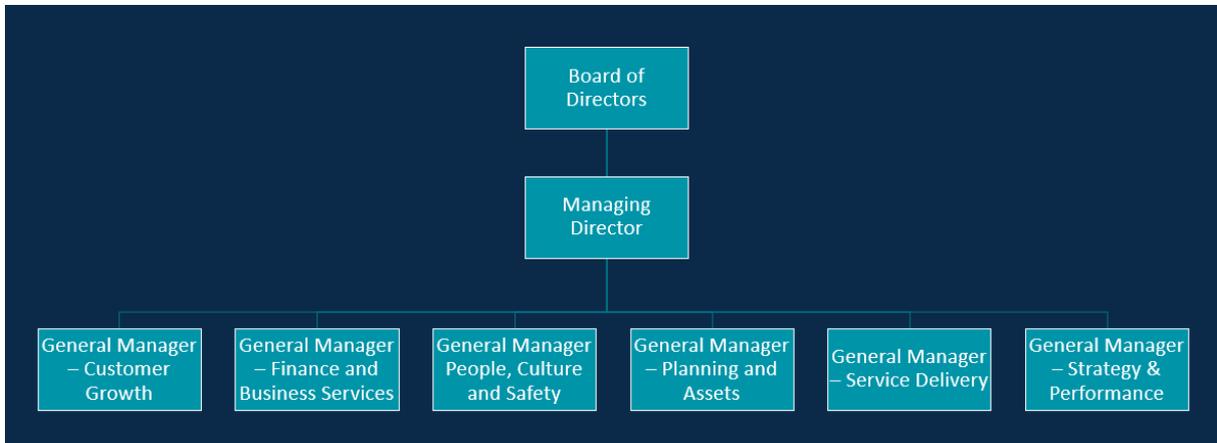
- **Strive To Improve**

We are open minded and seek out opportunities to learn to become better for ourselves and ensuring service excellence for customers.

GVW’s approach to modern slavery risk management is shaped by the organisational values, which guide ethical decision-making and responsible conduct across all areas of operation. These values support a culture of integrity, collaboration, and continuous improvement, ensuring that human rights are respected and upheld throughout the organisation’s activities and supply chains.

OUR STRUCTURE

The GVW organisational structure consists of a Board of Directors, a Managing Director as well as General Managers. They are responsible for specialist areas across our business, including Customers and Growth, Finance and Business Services, People Culture and Safety, Planning and Assets, Service Delivery and Strategy and Performance.



Workforce Profile

As of June 2025, Goulburn Valley Water employed 249 individuals, equivalent to 242.12 full-time equivalent (FTE) positions. The organisation continues to support flexible work arrangements across its workforce, contributing to a culture of inclusion and wellbeing. The workforce includes a significant proportion of mature professionals, with 27 per cent aged over 55, and female representation stabilised at 29 per cent.

A reduction in overall staff turnover to 9.6 per cent, including a critical role turnover rate of two per cent, reflects organisational stability and effective workforce planning. Monitoring



turnover in critical roles supports continuity of service and enables targeted succession and skills development strategies.

Maintaining a stable, well-supported, and locally engaged workforce is a key factor in reducing modern slavery risks. A direct employment model with strong oversight of working conditions, ethical recruitment practices, and internal capability development reduces reliance on outsourced or high-risk labour arrangements. These workforce characteristics contribute to a lower-risk operating environment and reinforce GVW's commitment to ethical employment and human rights.

GOVERNANCE AND COMPLIANCE

Goulburn Valley Water operates its business responsibly, ethically and with integrity.

As a state-owned enterprise, GVW abides by, among others:

- the Public Administration Act 2004 (Vic) which takes a comprehensive approach to supporting good public administration in Victoria by:
 - providing a broad definition of the public sector that includes 'public service bodies' (departments and administrative offices), 'special bodies' that have a special relationship with Government and 'public entities'
 - establishing a framework to ensure the effective governance of the whole of the Victorian public sector, to help government manage both the financial and non-financial risks associated with public entities carrying out functions on its behalf
 - enshrining the core and enduring public sector values of responsiveness, integrity, impartiality, accountability, respect, support for human rights, and leadership, which represent the defining characteristics of the behaviour required of all public sector employees.
- The [Water Act 1989 \(Victoria\)](#) and also complies with the [Water Industry Act 1994](#).
- the [Financial Management Act 1994](#) (Vic)
- the [Principles of Probity](#) (integrity, fairness and honesty)
- the [Codes of Conduct](#) issued by the Victorian Public Sector Commission (VPSC)
- our own internal business controls, policies and procedures, which include: Conflicts of Interest, Fraud and Corruption Control; Public Interest Disclosure; Competitive Neutrality; Gifts, favours, entertainment and other payments; Confidential information; Discrimination and sexual harassment; Health, Safety and Environment; Accounting, financial reporting and internal controls.

PROCUREMENT, DUE DILIGENCE AND SUPPLY CHAIN ASSURANCE

Goulburn Valley Water has established a foundational governance framework to support ethical procurement and supply chain oversight. Procurement and sourcing activities are aligned with the Victorian Government Purchasing Board (VGPB) requirements and underpinned by the Victorian Government's [Supplier Code of Conduct](#) which sets clear



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expectations for responsible supplier behaviour. The organisation makes extensive use of both mandatory and optional Victorian Government panel arrangements, which serve as a first-level control mechanism. Suppliers engaged through these panels are required to declare their positions on modern slavery and disclose relevant risk areas, where applicable. This approach ensures greater transparency and supports the organisation's commitment to ethical procurement practices.

While these mechanisms provide a strong baseline, the current governance maturity has been assessed as foundational, with modern slavery risk not yet fully integrated into corporate policies, risk registers, or supplier management processes. To address this, GVW is progressing toward the development of a standalone Modern Slavery Policy, alongside improvements in staff awareness, training, and cultural engagement. These enhancements will support a more structured and proactive approach to managing modern slavery risks across operations and supply chains.

Local Jobs First

Goulburn Valley Water applies the Local Jobs First Policy to all procurement activities valued at \$1 million or more in regional Victoria, in accordance with the *Local Jobs First Act 2003*. This policy promotes local industry participation and workforce development, contributing to regional economic growth and resilience.

By prioritising local suppliers and contractors, GVW reduces reliance on complex international supply chains. These global supply chains can present significant challenges in visibility and traceability, particularly where multiple tiers of subcontracting are involved. Such complexity increases the risk of unethical labour practices, including modern slavery, going undetected.

Engaging local suppliers not only enhances transparency and accountability for the organisation, it also enables closer oversight of labour practices, working conditions, and compliance with ethical standards. This approach strengthens supplier relationships, supports responsible sourcing, and aligns with GVW's broader commitment to safeguarding human rights and promoting sustainable procurement outcomes.

Our Supply Chain

During the development of its initial Modern Slavery Position Statement in 2024, Goulburn Valley Water undertook a review of supplier locations across both domestic and international markets. The majority of suppliers are based in Australia, with a small proportion located in New Zealand, the United States, Canada, the United Kingdom, and the European Union. Collectively, these international suppliers account for less than 0.01 per cent of total operational spend.

Procurement trends observed in the 2024–2025 financial year indicate a consistent pattern, with no significant changes to supplier geography or spend distribution. As such, the organisation's supply chain risk assumptions remain unchanged, with the predominance of local suppliers continuing to support a lower-risk profile in relation to modern slavery exposure.

The map below indicates supplier locations (*Source: GVW Vendor Master*).



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Modern-day Slavery risks in our operations and supply chain

From the perspective of the tier 1 supply chain, GVW’s Modern Slavery risk exposure is considered low. This is primarily due to the level of off-shore expenditure. Currently, less than 0.01% of operational expenditure is currently outside of Australia, with all the international suppliers of this spend with countries that have current Modern-day Slavery legislation.

The only countries of technical concern are Israel and the United States.

According to the Global Slavery Index 2023, an estimated 3.8 in every thousand people were in modern slavery in Israel and 3.3 in the United States (it should be noted that the US ranks equal 2nd in its actions to combat MDS). This compares adversely to the European Union at 6.9 in every thousand people, and the United Kingdom and Canada with 1.8, and Australia with 1.6 in every thousand people were in modern slavery.

In undertaking the creation of the organisations first Modern Slavery Statement an assessment of the tier 2 supply chain was initiated. This has commenced with the distribution of a Modern Slavery self-assessment questionnaire to understand where suppliers source their goods and services from, and the risk potential therein.

The response rate to the questionnaire was lower than expected. It should be noted that the responses received demonstrated a low level of understanding of Modern-Day Slavery requirements. This does not imply a low level of commitment.

The information provided, and additional research, identified that the tier 2 supply chain comprises in excess of 140 potential countries of supply.

The high-risk potential countries include:

China	Malaysia	Hong Kong
Thailand	Indonesia	Vietnam
Philippines	Poland	Turkey
Sri Lanka	Thailand	Spain*
Russia	India	Bangladesh
High Risk Regions		
Latin America	Africa	Middle East



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*Spain is included here due to it not having any legislative protections in place

The medium-risk potential countries of supply include:

United States
France
Nepal

Portugal
South Korea
Israel

Czech Republic
Italy

Relevant Modern Slavery Risk Factors

Goulburn Valley Water acknowledges the potential for modern slavery risks within its supply chain, due to the diversity of geographic regions and industries from which goods and services are sourced, both directly and through the organisations suppliers. The complexity and global nature of these supply chains can limit visibility and traceability, particularly across multiple tiers of subcontracting.

A review of publicly available resources, including the *Walk Free Global Slavery Index*, has informed the identification of potential risk factors. These include sourcing from regions with elevated vulnerability to forced labour, weak governance, and limited labour protections.



The following map provides insight into where our suppliers source the goods and services, they supply to Goulburn Valley Water

(Source: MDS Self-assessment Questionnaire conducted in 2024).



Additionally, certain product categories commonly procured by public sector organisations have been identified as high-risk, including:

- **Cleaning services and products**
- **Construction and property maintenance**
- **Personal protective equipment (PPE)**
- **Office supplies and promotional merchandise**
- **ICT hardware and electronics**
- **Catering and food services, particularly dry goods such as tea and coffee**

These categories often involve labour-intensive production processes, low-skilled or migrant labour, and sourcing from countries with documented modern slavery concerns. GWV continues to develop assessments these risks through supplier engagement, due diligence processes, and alignment with ethical procurement frameworks to ensure responsible sourcing and uphold human rights across its supply chain.

Actions to assess and address identified risks including mitigations, controls and remediation

Goulburn Valley Water maintains a supplier base exceeding 2600 vendors within its financial systems. Procurement and purchasing activities are currently decentralised, with individual business units engaging suppliers directly. While this model supports operational agility and aligns with GWV's strong customer-centric values, it can present challenges in consistently verifying supplier credentials, ethical standards, and modern slavery risk indicators prior to engagement. The gaps in organisation-wide prequalification process increases the potential for exposure to unethical labour practices, particularly in high-risk categories.

To address this, GWV is strengthening its procurement governance by embedding modern slavery risk management into policy, procedures, and sourcing events. The Procurement



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function will be undertaking a governance review in 2026 to ensure a more integrated and robust strategic sourcing approach.

Through a more strategic and category lead procurement approach will enable consistent supplier screening, improve visibility across the supply chain, and ensure ethical standards are upheld throughout the procurement lifecycle.

As part of this review, insights gained from the initial supplier self-assessment survey conducted during the development of the first Modern Slavery Position Statement will be incorporated into future supplier onboarding procedures. The core elements of the questionnaire will be embedded into prequalification requirements and market-facing documentation, including RFQs, RFPs, RFTs, and contracts. This will support early identification of risk factors and enable targeted engagement with suppliers whose operations or supply chains may present modern slavery concerns.

In parallel, staff involved in procurement activities and contract management will receive training to build awareness and capability in identifying and responding to modern slavery risks, ensuring a consistent and informed approach across all stages of supplier engagement.

Categories of concern specifically promotional products, uniforms, and personal protective equipment (PPE) have been identified for further investigation. Mitigation strategies will include the development of category plans for high-risk commodities and the implementation of supplier relationship management plans for selected suppliers.

Carrying on from 2024, a key area of focus continues to be the organisation's Emissions Reduction Program, which involves the development of solar farms to offset energy-related emissions. Modern slavery risks associated with this initiative stem from the sourcing of solar panels from China, which dominates over 80 per cent of the global supply chain across all manufacturing stages, including polysilicon, ingots, wafers, cells, and modules. GVW will work collaboratively with its Australian-based supplier to assess and mitigate any identified risks associated with this supply chain.



Assessment of the effectiveness of current actions

To assess the effectiveness of our actions in addressing modern slavery risks, we have undertaken a structured maturity assessment across key organisational domains. This assessment has provided a baseline of our current capabilities and identified priority areas for improvement. The evaluation covered twelve criteria, including stakeholder engagement, policy integration, supply chain mapping, risk assessment, supplier engagement, and remediation mechanisms.

GVW's current maturity profile indicates that most domains are at the Foundational or Emergent stages, reflecting early development in formalising processes and embedding modern slavery considerations into core business practices. Notably, areas such as Policy & Position Statement and Statutory Reporting have progressed to the Established level, demonstrating a growing organisational commitment and compliance with legislative requirements.

GVW's next strategic focus is to develop in key areas particularly in Supplier Modern Slavery Risk Assessment, Due Diligence Monitoring with the aim of progressing towards a Dynamic maturity level. This will involve developing reporting capabilities and further integrating modern slavery risk management across GVW's procurement and governance framework. GVW will continue to use this maturity model to track progress, inform strategic planning, and ensure continuous improvement in our approach to mitigating modern slavery risks.

The effectiveness of current controls in managing modern slavery risks is influenced by the capacity of suppliers to identify and disclose the country of origin for goods and services provided to GVW. This challenge is particularly pronounced given the predominance of locally based suppliers, with approximately 84 per cent located within Victoria. Many of these suppliers are classified as small to medium enterprises (SMEs) or small business entities, which are not subject to mandatory reporting under the Modern Slavery Act 2018. As a result, visibility into second-tier and third-tier supply chains is often limited, constraining the ability to trace product origins and assess labour practices beyond the first tier.

Compounding this challenge is the scale and structure of supplier engagement. Maintaining a large supplier base of over 2,600 limits the organisation's ability to apply uniform due diligence processes prior to engagement and measure effectiveness of actions.

By moving toward a more consolidated supply chain and introducing category management practices to streamline the supply chain and supplier engagement, the organisation can reduce supply chain complexity and enable more targeted oversight of higher-risk commodities. Strengthening policy integration, centralising procurement governance, and enhancing supplier onboarding such as incorporating modern slavery self-assessment surveys will support more effective risk identification and mitigation. These improvements will also enhance the overall effectiveness of procurement actions, ensuring that interventions are timely, focused, and aligned with strategic objectives.



Continuous Improvement – FY 2026 and beyond

As part of the organisation's ongoing commitment to addressing modern slavery through enhanced business understanding and increased transparency, GVW will undertake a series of targeted actions to improve visibility across its supply chain and better assess potential risk areas.

- **Governance and Cultural Initiatives**

Strengthening the governance framework to support a more structured and proactive approach to modern slavery risk management. As part of this commitment, the organisation will develop a standalone Modern Slavery Policy to support its position, clarify responsibilities, and embed ethical sourcing principles across procurement and operational practices.

In addition to policy development, emphasis will be placed on staff awareness and education. Targeted training and internal communications will be used to build organisational capability in identifying and responding to modern slavery risks. These efforts aim to ensure that employees across all levels understand the relevance of modern slavery to their roles and are equipped to uphold ethical standards in their purchasing activities.

To further embed awareness into organisational culture, GVW will incorporate key flagship awareness days—such as the United Nations World Day Against Trafficking in Persons—into its internal cultural calendar. These observances will serve as opportunities to engage staff, reinforce values, and promote ongoing dialogue around human rights and ethical labour practices.

- **Inventory Management**

Country of origin and manufacturing location data will be incorporated into the annual inventory stocktake program. This initiative will support the development of a comprehensive database of inventory origins, enabling more informed engagement with suppliers and strengthening the organisation's modern slavery risk profile.

- **Focus Areas for Risk Assessment**

Specific procurement categories have been identified for further scrutiny due to their potential exposure to modern slavery risks. These include:

- Uniforms and PPE
- Infrastructure projects and construction materials
- Electrical parts and electronic equipment, including metering equipment
- Mechanical components
- Maintenance service providers, parts, and consumables
- Facilities management
- Digital programs

These actions form part of a broader strategy to enhance ethical sourcing practices, improve supply chain transparency, and uphold Goulburn Valley Water's commitment to human rights and responsible procurement.



Consultation Process

In accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*, Goulburn Valley Water confirms that it does not own or control any subsidiary entities. As such, no formal consultation with other entities was required in the development of this modern slavery statement.

The statement has been developed internally through cross-functional collaboration across relevant business areas, ensuring alignment with organisational policies, procurement practices, and risk management frameworks.



Mapping against the mandatory criteria

	Mandatory Criteria	Page Number(s)
1	Identify the reporting entity.	4
2	Describe the reporting entity's structure, operations and supply chains.	6
3	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9
4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11
5	Describe how the reporting entity assesses the effectiveness of these actions.	13
6	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	14
7	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A

PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery statement was approved by the principal governing body of Goulburn Valley Water as defined by the Modern Slavery Act 2018 (Cth).

Approved by the Goulburn Valley Water Board of Directors on xx/xx/2024

Signature of Responsible Member

This Modern Slavery statement is signed by a responsible member of Goulburn Valley Water as defined by the Act:

Mark Stone
Chair | Goulburn Valley Water



Goulburn Valley Water Modern Slavery Statement - 2025

Details of Review/Changes

Date	Description	Modified By	Approved By
28/10/2025	Draft Statement 2025	Monique Chalker – Procurement Coordinator	



Our Ref. FOL/8817 - DOC25/88818

29 October 2025

Mark Stone AM
Chair
Goulburn Valley Water

Email: mark.stone@gvwater.vic.gov.au

Dear Mark

MANAGEMENT REPRESENTATION MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR ENDING 30 JUNE 2025

Senior management confirms the Modern Slavery Statement (the Statement) for the financial year ending 30 June 2025 has been prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* (the Act) and the associated guidance issued by the Attorney-General's Department.

We make the following representations:

1. Scope and Structure

The Statement accurately outlines our organisational structure, operations, and supply chain, addressing all mandatory reporting criteria under the Act.

2. Risk Identification and Due Diligence

GVW has undertaken an initial assessment of modern slavery risks across its tier 1 and tier 2 supply chains. This includes the distribution of a self-assessment questionnaire to suppliers to better understand sourcing practices and potential exposure. The information received has informed our understanding of risk areas and will guide future engagement and due diligence activities and progress is truthfully reflected in the Statement.

3. Policies and Governance

We operate with a strong governance framework underpinned by public sector legislation, codes of conduct, and internal policies. These include probity principles, fraud control, ethical procurement practices and governance mechanisms are in place and will continue to evolve. Oversight and accountability for modern slavery compliance are clearly assigned to senior leadership, as detailed in the Statement.

4. Training and Capability Building

GVW recognises the importance of developing internal capability to identify and respond to modern slavery risks. As an initial step, an eLearning module has been completed by relevant staff to raise awareness and build foundational understanding. While a comprehensive training framework is still under development, this early initiative provides a platform for the future rollout of more structured and targeted capability-building programs across the organisation.

5. Monitoring and Effectiveness

GVW has commenced efforts to assess the effectiveness of its actions, including supplier engagement and internal governance. These efforts are in the early stages and will be strengthened through improved data collection, performance indicators, and feedback mechanisms. The Statement includes both retrospective performance outcomes and forward-looking objectives.

6. Incident Management and Remediation

There were no reported incidents of modern slavery during the reporting period. While we are still developing formal mechanisms for incident identification and response, we recognise the importance of having clear processes in place. We are committed to strengthening our approach over time to ensure any future concerns can be addressed promptly and appropriately.

7. Consultation and Engagement

The Statement has been developed internally through cross-functional collaboration across relevant business areas, ensuring alignment with organisational policies, procurement practices, and risk management frameworks.

8. Compliance and Continuous Improvement

We confirm that, to the best of our knowledge, the Statement complies with the Act and any applicable state-based legislation where relevant. We are committed to strengthening our modern slavery response through continuous improvement, informed by internal reviews, stakeholder feedback, and the recommendations of the 2023 independent review of the Act. Our approach will continue to evolve to reflect emerging risks, best practices, and regulatory developments.

Senior Management Declaration

Based on an evaluation of our systems, processes, and controls throughout the reporting period, we confirm that the Statement is accurate, complete, and not misleading, and that it fairly represents the efforts taken by GVW in compliance with regulatory requirements.

Yours sincerely



Stephen Capewell
Managing Director

29 October 2025



Glen Pearson
General Manager – Finance & Business Services

29 October 2025