

Hunter Water



Modern Slavery Statement

2024-25



Table of Contents

Our commitment	3
A letter from the Hunter Water Board of Directors	4
Our structure, operations and supply chains	5
Modern slavery action plan	11
Ongoing and new actions	12
Case study	14
Looking forward	15
Consultation	16
Relevant information	16
Compliance checklist	17

Acknowledgement of Country

Hunter Water acknowledges the Traditional Countries of the Awabakal, Darkinjung, Geawegal, Wonnarua and Worimi peoples and the Countries on which we operate and beyond where our water flows.

We recognise and respect the cultural heritage, beliefs and continuing connection to the lands and waters of our Traditional Custodians and pay respect to their Elders past, present and emerging.

Our commitment



Hunter Water is committed to building a sustainable water future, supported by ethical, transparent, and responsible business practices. A key part of this commitment is actively identifying and addressing modern slavery risks within our operations and supply chains.

Modern slavery is a serious global issue that can impact supply chains connected to Australian businesses. We are focused on ensuring that our business relationships do not involve or tolerate any form of modern slavery.

We collaborate closely with industry and supply partners to develop shared strategies for identifying, managing, and mitigating modern slavery risks, and to reduce potential harm.

Our sixth Modern Slavery Statement highlights the progress we have made, including embedding modern slavery risk management into our policies, procedures, and organisational culture, as well as assessing and rating the effectiveness of our controls to ensure continuous improvement.

A letter from the Hunter Water Board of Directors

Dear Commissioner,

Hunter Water is pleased to submit this Modern Slavery Statement for the 2024–25 financial year, in accordance with the *Modern Slavery Act 2018 (Cth)*. This statement has been lodged with the Australian Government Attorney-General's Department for publication on the Online Register for Modern Slavery Statements.

As a trusted provider of high-quality water and wastewater services, Hunter Water is deeply committed to ethical and responsible practices. We work collaboratively with landholders, suppliers, and stakeholders to serve our community with integrity.

This statement outlines our ongoing efforts to identify, assess, and address modern slavery risks within our operations and supply chain. Our approach is guided by strong governance, with active oversight from our Executive Management Team and Board of Directors.

During the 2024–25 reporting period, we have built upon the foundations laid in previous years, advancing the implementation of our Modern Slavery Action Plan. A key milestone has been the integration of modern slavery risk considerations into our Enterprise Risk Management Framework. This ensures modern slavery is recognised as a strategic risk and managed consistently across the organisation, with clear accountability and visibility at all levels.

This statement has been formally approved by our Executive Management Team and the Hunter Water Board of Directors.



Elizabeth Crouch AM
Chair



Jennifer Hayes
Acting CEO

Our structure, operations and supply chains

Who we are

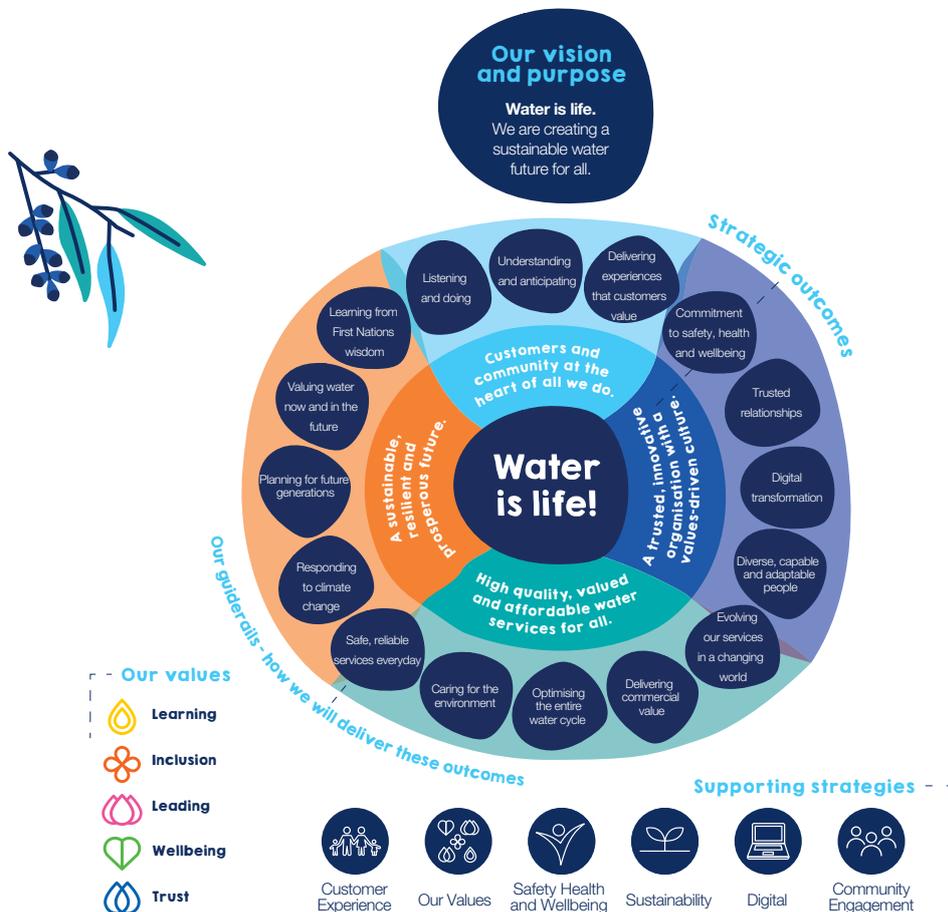
Hunter Water Corporation (ABN 46 228 513 446) provides safe, reliable, and high-quality water and wastewater services to almost 640,000 people across the Lower Hunter region. Established in the 1880s to protect public health in Newcastle, Hunter Water is a trusted provider of safe drinking water and responsible management of wastewater, stormwater, recycled water, and trade wastewater services.

We are governed by a Board of Directors appointed by our voting shareholders, the NSW Treasurer and the Minister for Finance and Small Business, in accordance with the Hunter Water Act 1991. Our Board comprises the Chair, Acting Chief Executive Officer, and seven independent Non-Executive Directors.

Hunter Water was the first State-Owned Corporation (SOC) proclaimed in New South Wales under the *State-Owned Corporations Act 1989* and operates within a robust regulatory framework with agencies such as the NSW Environment Protection Authority (EPA), NSW Health, SafeWork NSW, and the Independent Pricing and Regulatory Tribunal (IPART).

Guided by our values Leading, Learning, Inclusion, Wellbeing, and Trust, as well as our purpose “Water is Life”, our vision is to create a sustainable water future for all, ensuring our services support the wellbeing of people, the environment, and future generations.

We are committed to the United Nations Sustainable Development Goals (SDGs) and are proud to be a member of the Hunter Region SDG Taskforce, a coalition of purpose-driven businesses, not-for-profits, local councils, and government agencies united by a shared ambition to achieve the United Nations SDGs.



What we do

Our area of operations is 6,671km² and includes the local government areas of Cessnock, Dungog, Lake Macquarie, Maitland, Newcastle and Port Stephens, as well as a small part of Singleton.

The Lower Hunter is a diverse and dynamic region, encompassing urban centres, regional towns, and rural communities. We value this diversity and are committed to operating in a manner that reflects respect, equity, and inclusion for all, including First Nations peoples. Our employees help deliver the life our communities desire, working closely with contractors, stakeholders and the community to manage an asset base of almost \$3.5 billion in water, wastewater and recycled water infrastructure.



Our operations

The following summary highlights the scale and significance of Hunter Water's infrastructure footprint.

We provide services to 640,000 people 

			
5,179 kilometres of water mains	57 reservoirs	6 water treatment plants	101 water pumping stations
			
5,581 kilometres of sewer mains	19 wastewater treatment plants	463 wastewater pumping stations	
			
96 kilometres of stormwater network	15 recycled water schemes are supplied from our system		

Our people

During the reporting period, Hunter Water's workforce comprised 568 employees (499 permanent, 38 part-time and 31 temporary). Our head office is located at 36 Honeysuckle Drive, Newcastle, NSW.

Hunter Water employees are engaged under Fair Work Commission-approved enterprise agreements or individual common-law contracts aligned with Australian employment law. We also host university students in work experience placements in accordance with relevant workplace laws.

For short-term roles, Hunter Water utilises a labour hire panel contract, which includes strict compliance requirements with Australian workplace legislation. Our labour hire panel suppliers are selected through a rigorous assessment of their recruitment and labour practices.

A small number of individual contractor arrangements are in place, each meeting Hunter Water's procurement standards and ethical sourcing requirements.

Hunter Water has implemented a range of policies and procedures to identify, manage, and reduce the risk of modern slavery within our organisation, including:

- ◆ Safety, Health and Wellbeing Policy
- ◆ Enterprise Agreement
- ◆ Leave Standard
- ◆ Remuneration Policy & Standard Code of Conduct
- ◆ Flexible Working Arrangements Standard
- ◆ Disclosures, Complaints and Allegations Policy & Standard
- ◆ Parental Leave Standard
- ◆ Values Based Culture Strategy & Behaviour Statements

As a result of our documented employee engagement and approval process, we assess our organisational modern slavery risk as low.

Contract arrangements

Hunter Water procures goods and services in accordance with our Procurement Policy and Procurement Procedure. Procurement activities are driven by business requirements, and our procurement contracts for range from purchase orders to formal contracts based on procurement value and complexity.

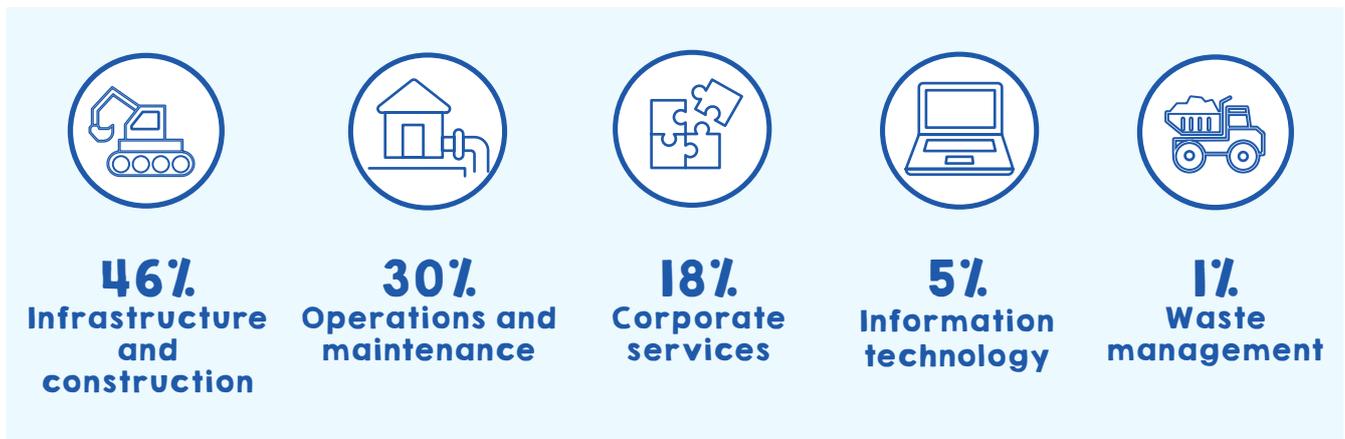
All of Hunter Water's contracts issued to the market have a Modern Slavery compliance requirement. This includes supplier requirements to ensure:

- ◆ Compliance with all Modern Slavery laws
- ◆ Investigation of labour practices, as well as any subcontractor labour practices, in the supplier's operations or its own supply chain
- ◆ Internal Modern Slavery processes, procedures, investigations and compliance systems
- ◆ That if a Modern Slavery risk is discovered in the supplier's operations or supply chain, Hunter Water is notified of these risks, advising what actions are being taken to address those risks
- ◆ Providing its Modern Slavery Statement or other reporting to Hunter Water at our request.

Hunter Water is aware that some categories of goods and services we procure do attract a higher risk of modern slavery based on geographic origin or industry sector as categorised by the Global Slavery Index. These suppliers continue to require ongoing engagement via our mandatory Supplier Partnership Principles and via their contract obligations and reporting to ensure that modern slavery risks are identified, assessed and addressed.

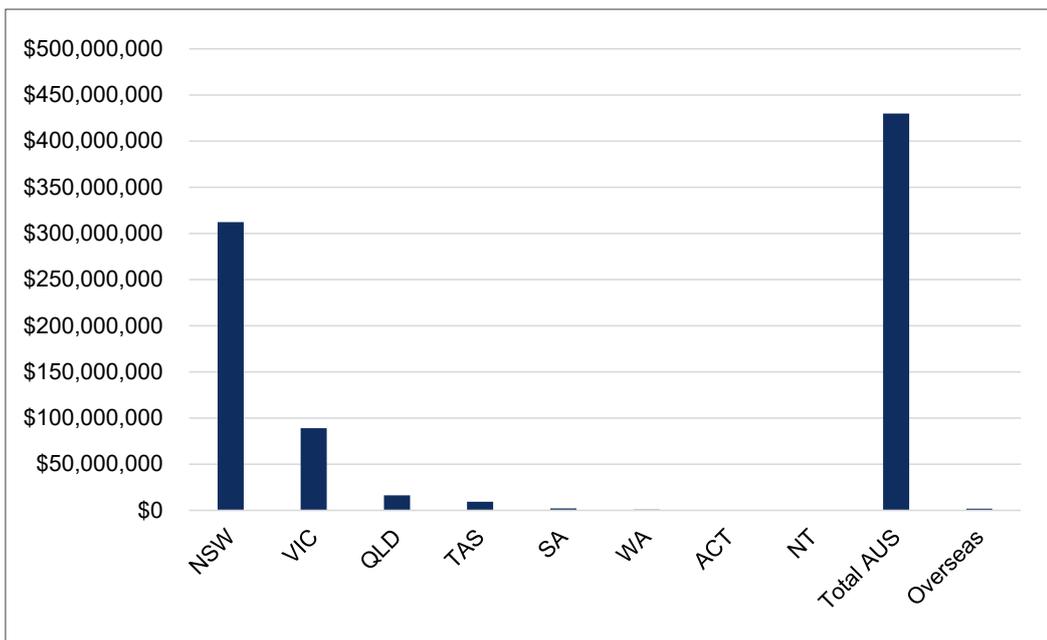
Supply chain expenditure during the reporting period

During 2024-25, Hunter Water supplier payments totalled \$431.9 million. The majority of Hunter Water’s supplier base is located in New South Wales where the risk of modern slavery has been assessed as low. Hunter Water’s expenditure in Australia and NSW is considered low risk for modern slavery, supported by strong governance and regulatory frameworks and Australia’s top ranking in the Global Slavery Index for government response.



Hunter Water maintained a supplier base of 775 suppliers during the 2024-25 reporting period. We are committed to procuring goods and services from local supplier partners as evidenced by the data below. 96.8% of our supplier spend in 2024-25 was to businesses in Australia.

Hunter Water’s spend for reporting period



The remaining 3.23% is to 29 overseas suppliers across following countries during this reporting period. These goods and services were procured under a combination of Hunter Water's Purchase Order Terms & Conditions, Core & NSW ICT Digital Contract and Supplier Specific Terms and Conditions for ICT software and licences.

Country of supply	Items purchased	Number of suppliers	Spend (AUD)
United States of America	Information Technology software, licences & services Professional services (Education Provider)	12	\$754,000
New Zealand	Information Technology software, licences & services Professional services (Environment Consultancy)	6	\$550,000
Israel	Information Technology software & licences	2	\$302,000
England	Information Technology software & licences	3	\$242,000
Canada	Information Technology software & licences	3	\$82,000
Ireland	Information Technology software & licences	2	\$34,000
Netherlands	Information Technology software & licences	1	\$9,000



Risks of Modern Slavery in our operations and supply chains

Hunter Water understands and recognises that modern slavery risk has the potential to cause harm. Such risks may arise where Hunter Water could:

- ♦ Cause modern slavery or human rights impacts through its own operations or supply chains.
- ♦ Contribute to such impacts through its activities or business relationships.
- ♦ Be directly linked to modern slavery or human rights impacts through products and services procured from suppliers.

Our approach is guided by Hunter Water's Enterprise Risk Management Framework, aligned with ISO 31000 Risk Management – Guidelines, ensuring a consistent and integrated process across the organisation. Key areas of modern slavery risk include:

- ♦ Insufficient monitoring of labour practices.
- ♦ Procurement of apparel and personal protective equipment (PPE) for our workforce.
- ♦ Construction projects and infrastructure development involve significant labour for construction, manufacturing, and transportation of heavy materials, particularly where subcontracting occurs.
- ♦ Engagement of third-party contractors for construction, maintenance, landscaping, and cleaning services.
- ♦ Information technology hardware and equipment supply chains.
- ♦ Failure to identify and effectively address modern slavery concerns in our supply chains, as required by the Modern Slavery Act.

A range of preventative and corrective measures have been implemented to address these risks, as outlined in Section 4: 2024-25 ongoing and new actions.

Oversight of risk management is maintained through robust corporate governance, led by our Board of Directors and the Audit and Risk Committee. This includes reviewing our modern slavery risk exposure and control effectiveness. Based on current assessments, these risks are rated as low and fall within the risk appetite established by the Board.

To support our compliance with modern slavery legislation, Hunter Water subscribes to a compliance monitoring service, which is embedded within our ERM system (Protecht).

This integration allows for:

- ♦ Ongoing tracking of legislative and regulatory changes.
- ♦ Regular compliance checks across business functions.
- ♦ Documentation of strategies and actions to assess and manage modern slavery risks.
- ♦ Improved visibility and accountability across our supply chains.

Importantly, this system also informs the development of our Modern Slavery Statements, ensuring that our reporting is accurate, up to date, and aligned with best-practice standards.

Modern slavery action plan

Our Modern Slavery Action Plan continues to guide our modern slavery due diligence processes to ensure an effective approach for the identification, prevention, and mitigation of modern slavery risks in our operations and supply chain.

Our plan includes actions completed, currently progressing, and actions we aim to achieve over the new reporting period. Our key controls to manage risks of modern slavery in our operations and supply chains are based on five focus areas covering.



**Risk
identification
and planning**



**Awareness
and
training**



**Collaboration
and
engagement**



**Governance
and
risk mitigation**



Resources



Report card

Action	Details	Year	Status
 Gap Analysis	Undertake detailed organisational gap analysis and a supplier data analysis to identify potential modern slavery risks and mitigation actions within our operations and supply chains	2019-20	100%
 Modern Slavery Action Plan	Develop, implement and report on an organisational-wide modern slavery Action Plan Road Map based on the gap analysis learnings to build and continually improve our modern slavery mitigation activity over a 3-year period. To be endorsed by the Executive Management Team	2019-20	100%
 Modern Slavery Risk Supplier Assessment	Establish a tool and set of questions/criteria for assessing supplier modern slavery risk and a hierarchy of risk management actions based on risk assessment.	2021-22	100%
 Awareness Training	Implement Modern Slavery Awareness training for members of our Executive Management Team and key Contract Managers/Procurement Staff.	2024-25	40%
 Supplier Partnership Principles	Establish and launch the Supplier Partnership Principles to set out our expectations of our partner suppliers and require our suppliers to provide information regarding the identification and mitigation of modern slavery risks, including hidden labour exploitation.	2019-20	100%
 Awareness and Training	Develop and implement mandatory training module for all staff and contractors at Hunter Water.	2020-21	100%
 Supplier Forum	Develop and deliver supplier awareness training to our key construction, civil and electrical maintenance works supply partner.	2020-21	100%
 Water Utility Sector Collaboration	Establish/join collaborative industry sector groups to facilitate collaborative modern slavery information sharing and action. *See Section 5 Collaborative Action for details.	2020-21	100%
 Hunter Water Inter Department Collaboration	Establish a Sustainable Procurement Working Group with representatives from across several functions within our business who are responsible for the implementation and ongoing monitoring of sustainable procurement objectives, including the Modern Slavery Action Plan.	2020-21	100%
 Sustainable Procurement Working Group	Establish a Sustainable Procurement Working Group with representatives from across several functions within our business who are responsible for the implementation and ongoing monitoring of sustainable procurement objectives, including the Modern Slavery Action Plan. The Working Group will have accountability to the Group Manager Commercial & Procurement and provide progress updates to the Procurement Committee.	2020-21	100%
 Supplier Sustainability Assessment Schedule	Hunter Water established this assessment process to assess supplier maturation on a number of sustainability focus areas including labour practices, modern slavery risk management and compliance in support of the Supplier Partnership Principles.	2019-20	100%
 Governance and Risk Mitigation	Establish an independent and confidential Whistle Blower Service to facilitate reports of misconduct, including actual or suspected instances of modern slavery, for all employees, contractors, tenderers, suppliers, agents, and their employees.	2020-21	100%
 Contracts and Policy Review to Include Modern Slavery Legislative Requirements	Amend Hunter Water suite of Contracts to include clauses for compliance with modern slavery requirements, scaled to the relative risk and value associated with the contract terms. Amended Hunter Water internal policies and procedures to embed consideration of modern slavery risks into our business, such as the Conflicts of Interest policy.	2024-25	50%
 Labour Hire Panel	Establish a Labour Hire Panel tender to ensure tender responses incorporated consideration of the robustness of processes to mitigate the risk of modern slavery, labour exploitation, and human rights abuses of the respondents.	2020-21	100%
 Modern Slavery Enterprise Risk Management Incorporation	Establish a Modern Slavery Risk Management approach incorporated into Hunter Water's Enterprise Risk Management Framework and tool. *See case studies for details	2020-21	100%
 Modern Slavery Risk Triage Protocol	Establish organisational protocols for triage, response, and investigation and close of actual or suspected incidents of modern slavery in Hunter Water Supply Chains	2020-21	100%
 Modern Slavery Audit	Commission of a review into the level of maturity in embedding modern slavery risk management commitments into Hunter Water practices	2022-23	100%
 Modern Slavery Audit recommendations	Review, prioritisation and implementation of recommendations from the Modern Slavery Audit are being undertaken with key actions to be incorporated into the 24-25 Modern Slavery Action Plan. Focus will be given to the following areas ranked as Improving under the Modern Slavery Maturity Model of Assessment in the audit.	2023-24	50%
 Modern Slavery Audit recommendations	Risk Management Integrate Human Rights and Modern Slavery into the Enterprise Risk Management (ERM) Principles. Conduct a comprehensive modern slavery risk assessment, establish mutually exclusive and collectively exhaustive controls, and define clear governance for managing modern slavery risks.	2024-25	45%
 Modern Slavery Audit recommendations	Supply Chain Management Ensure procurement controls are comprehensive and exclusive. Enhance due diligence for high-risk suppliers, embed industry and geographic risk ratings into procurement systems, and assess high-risk suppliers for potential modern slavery or human rights abuses.	2023-24	50%
 Modern Slavery Audit recommendations	Monitoring and remediation Align grievance mechanisms with UNGP principles: develop collaboratively with stakeholders, ensure rights compatibility and accessibility, and integrate lessons learned into operational changes. Require suppliers to report any modern slavery instances in their operations and supply chains.	2024-25	50%
 Dedicated resource	Establish a position that is dedicated to Modern Slavery risk management.	2024-25	100%

2024-25 ongoing & new actions

Supplier Partnership Principles

Hunter Water's Supplier Partnership Principles and associated Schedules include modern slavery specific questions embedded within the tender process, ensuring supply partners help us understand modern slavery risks within the supply chain. Information collected during the tender phase provides insight into supplier management practices and requires action to address any real or perceived modern slavery risks.

Contract clauses

We have modern slavery clauses into our contracts, including our purchase order terms, ensure our suppliers comply with identifying, notifying and actioning modern slavery risks such as unethical labour practices. These clauses, as well as contract-specific key performance indicators, set clear expectations and accountability across procurement activities.

Dedicated Supply Chain Manager

In February 2025, Hunter Water appointed a dedicated Supply Chain Manager to lead the ongoing integration of modern slavery risk management into our policies, procedures, and practices, with a focus on continuous improvement and alignment with industry best practice.

Grievance and remediation process

Our Disclosures, Complaints and Allegations Policy provides clear pathways for employees, supply partners, contractors, customers, and the community to report concerns, including potential modern slavery cases. Together with the Modern Slavery Triage Response Procedure, it outlines how suspected cases are reported and managed.

Training and awareness

Our mandatory online modern slavery awareness training remains a measure in managing risk across Hunter Water's operations and supply chain. As at the end of the reporting period, 98.8% of our workforce had completed the training.

Monitoring and compliance

Hunter Water engages media monitoring services to stay informed of emerging issues at state, national and international levels. Furthermore, our Legal team track changes in legislation, case law and government directives to ensure our practices remain compliant and informed.

Collaboration

Hunter Water's Supply Chain Manager actively participated in the following forums:

- ◆ Water Services Association of Australia (WSAA) Modern Slavery Community of Practice (COP), on 17 April 2025.
- ◆ NSW Anti-slavery Commissioner (OASC) online Anti-slavery forum, on 21 May 2025.
- ◆ Water Services Association of Australia (WSAA) and the Attorney-General's Department awareness session on the annual Modern Slavery Statement review and submission process, on 17 September 2025.

Modern slavery risk profile and supply chain risk analysis

With support from modern slavery specialists SD Strategies, Hunter Water reviewed and updated its modern slavery risk profile and supply chain risk assessment. This work incorporated key regulatory requirements and leading industry guidance, including the Modern Slavery Act, Global Slavery Index, and the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps (GRS) and Inherent Risk Identification Tool. The review involved mapping higher-risk categories across our supply chain and identifying opportunities to strengthen our approach. Improvement opportunities identified included:

- ◆ Refreshing our online modern slavery training to deliver a more tailored model.
- ◆ Expanding the integration of modern slavery considerations across Hunter Water's Human Resources frameworks, policies, procedures and checklists.
- ◆ Further embedding modern slavery risk assessments into procurement planning processes, with defined triggers and reporting expectations.

Effectiveness of our actions

To evaluate the effectiveness of the actions, Hunter Water applies the following measures:

Focus Area	Awareness and Training 	Collaboration and Engagement 	Governance and Risk Mitigation 
Objective	Identify the reporting entity Increase awareness of modern slavery practices and support our people to identify signs of modern slavery and how to respond.	Engage in open dialogue with suppliers, industry and government activities to support the eradication of modern slavery. Enhance knowledge and understanding through engagement with human rights experts and worker advocates.	Provide employees and third parties with a process to report actual or suspected instances of modern slavery practices or human rights complaints in our operations or supply chain
Measure of effectiveness	Number of employees who have completed our modern slavery training.	Participation in Water Services Association of Australia (WSAA) Modern Slavery Community of Practice meetings. Participation in external forums to ensure we keep up to date of best practice initiatives to ensure our initiatives are in line with industry and societal expectations	Number of modern slavery related whistleblowing alerts raised during the year.

Case study

Procurement of promotional materials

During the reporting period, a case study was completed to identify improvement opportunities in the procurement of promotional materials that were purchased outside Hunter Water's standard procurement process. These types of purchases can present elevated modern slavery risks, as they often involve suppliers that have not been subject to our standard due diligence or ethical sourcing assessment.

The case study focused on analysing the nature and frequency of these purchases, assessing potential risk exposure, and identifying opportunities to enhance oversight. As a direct outcome, a checklist was developed to support teams involved in these procurement activities that are frequent and often of a lower value. This checklist helps a Hunter Water user to identify potential modern slavery risks by identifying red flags in purchasing like limited supply chain transparency, unusually low pricing or the absence of ethical sourcing certifications.

This initiative was important because these purchases, though often small in scale, can introduce significant risks. By equipping our teams with communication, tools and guidance to make more informed decisions, we are strengthening our overall approach to managing modern slavery risks.

Looking forward

Hunter Water acknowledges that modern slavery is a significant global issue impacting millions of people. We remain committed to playing our part in addressing this challenge by fostering responsible and ethical practices across our supply chain. We aim to continue working with suppliers who share our values and demonstrate a clear commitment to human rights. Through ongoing engagement and accountability, we will continue to strengthen our processes to help ensure goods and services we source, and the services we deliver are free from modern slavery.

We will also continue to uphold strong workplace policies, procedures and a positive workplace culture that supports best practice. As part of our ongoing commitment, we will further embed and enhance our approach to modern slavery risk management across our operations.

Our key focus areas for 2026 are outlined below, complementing the initiatives detailed in our modern slavery Action Plan.

Focus Area	Objectives for 2026
Risk Identification and Planning	<p>Expand our supplier sustainability assessment requirements to cover suppliers outside the formal procurement process, guided by risk factors such as geography, industry and the nature of the goods or services provided.</p> <p>Ensure supplier assessments are aligned, where possible, with the Australian Government Supplier Questionnaire.</p> <p>Review and further align grievance mechanisms with UNGP principles, where applicable</p>
Awareness and Training	<p>Strengthen supplier engagement through regular contract checkpoints, where materials are procured from overseas.</p> <p>Explore best practice for engaging with suppliers beyond our Tier 1 contractors.</p>
Collaboration and Engagement	<p>Continue industry collaboration through the WSAA Modern Slavery Community of Practice and other industry forums.</p>
Continuous improvement	<p>Review and continue to enhance our modern slavery governance framework to reflect our evolving maturity.</p>

Consultation

Under 16(1) of the *Modern Slavery Act 2018 (NSW) (NSW Act)*, Hunter Water is required to describe the process of consultation with any entities that the reporting entity owns or controls. Hunter Water does not own or control any other entities, this criterion is not applicable. Hunter Water does not consult any other entity in respect of our Modern Slavery Statement.

Relevant information

As Hunter Water is a State-Owned Corporation, additional obligations are imposed on it under the *Modern Slavery Act 2018 (NSW) (NSW Act)* including:

- ♦ A requirement that Hunter Water include the following matters in our Annual Report:
 - ♦ A statement of the action taken by Hunter Water in relation to any issue raised by the NSW Anti-slavery Commissioner during the financial years then ended concerning the operations of the agency and identifies by the NSW Anti-slavery Commissioner as being a significant issue.
 - ♦ A statement of steps taken to ensure that goods and services procured by and for Hunter Water during the financial year then ended were not the product of modern slavery within the meaning of the NSW Act.

Hunter Water confirms that during this reporting period, no matters were raised by the NSW Anti-Slavery Commissioner concerning the operations of Hunter Water, nor were any matters identified by the NSW Anti-Slavery Commissioner as being a significant issue.

During the reporting year, goods and services procured by and for Hunter Water were not the product of modern slavery within the meaning of the NSW Act.



Modern Slavery Statement Compliance Checklist

This Modern Slavery Statement addresses the mandatory reporting criteria of the *Modern Slavery Act 2018 (Cth)* in the following sections.

Mandatory Criteria	Reference in this statement
Identify the reporting entity.	Page 5
Describe the reporting entity's structure, operations and supply chains.	Pages 6 to 9
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Pages 9 to 10
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.	Pages 11 to 15
Describe how the reporting entity assesses the effectiveness of such actions.	Page 15
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 giving the statement).	Page 17
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 17

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