

# Our Modern Slavery Statement

Coliban Water's Modern Slavery Statement (Statement) is provided as a statement under section 14(1) of the *Modern Slavery Act 2018* (the Act) for the period from 1 July 2024 to 30 June 2025 for Coliban Water (ABN 96 549 082 360).

## Our commitment to the Act

We are 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 there is no form of modern slavery or human trafficking within our organisation or supply chains. We seek to ensure our employees and supply chains are not subject to behaviour or threats that may amount to modern slavery.

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

This Statement sets out actions undertaken in 2024/25 to mitigate the risk of modern slavery in our business and to ensure that where 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), which helped us to prepare to meet requirements of the Act. The VSPWG provided an opportunity to share resources, lessons learnt and standardise expectations and processes for suppliers in order to mature the industry-wide responses to modern slavery.

## Our 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 (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 2024 until 30 June 2025 was The Hon. Gayle Tierney MP, Minister for Water.



Our core business is providing safe drinking water, sewage and rural water services for public health and environmental protection so our communities can sustain themselves.



We provide urban water and sewage 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 *Water Act 1989* (Vic).

## Our structure, operations and supply chains



### What we do

Harvest, store, treat and distribute water.

Collect (reclaim) sewage, including trade waste.

Treat, reuse and dispose of reclaimed water and biosolids.

### About us

We manage:

- Infrastructure assets, property, plant, and equipment with a net book value of \$2.16 billion.
- 34 water reservoirs and service basins.
- 2,400 kilometres of potable and non-potable water mains.
- 19 water treatment plants.
- 76 water pump stations.
- 1 recycled water factory and 62 kilometres of recycled water infrastructure.
- 2,100 kilometres of sewer mains.
- 188 sewer pump stations.
- 16 water reclamation plants.
- 396 kilometres of rural supply channels and mains.

### Our supply chain

- Professional Services (Engineering, Project Management, Consultancy)
- General contractors
- Civil services
- Maintenance
- Cleaning
- Chemical supply
- Metering
- IT consulting
- Software licenses
- Software maintenance & support
- Computer Hardware
- Legal services
- Recruitment
- Travel
- Security



## Risks of modern slavery practices at Coliban Water

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:**



### Asset Maintenance portfolio

Ongoing operations and maintenance of facilities, including cleaning, grass cutting, and herbicide application/edge treatment.



### Construction portfolio

Construction labour (minor and major projects).



### Corporate portfolio

Temporary staff, labour hire and traineeship programs, and security.



### Customer portfolio

Debt collection services and customer research services.



### Equipment and Material portfolio

Mechanical and electrical equipment and chemical products.



### Information Technology Consulting portfolio

Offshore information technology services.

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

The introduction by the Department of Treasury and Finance Victoria 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 information technology, temporary staffing, 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.

### Actions completed in 2024/2025



#### Complete

Communicate with suppliers regarding how they are managing their own Modern Slavery risks.

Ensure compliance with the Act is included as a condition of tendering in all tendering documents and conduct audits to ensure compliance.



#### Complete

Communicate with suppliers flagged as having high-risk activities.

Add Modern Slavery risk assessment to the pre-planning stage of procurement lifecycle.



#### Complete

Customise tender documentation to meet the outcomes of this risk assessment.

Continue to provide Modern education to all new Coliban Water suppliers and employees.

## Assessment of the effectiveness of these actions

In 2024/25, Coliban Water continued to strengthen its approach to mitigating modern slavery risks by enhancing supplier engagement and internal procurement practices. Building on previous efforts, we implemented a series of targeted actions to improve our ability to identify, assess, and address potential risks within our supply chain.

Key initiatives included:

- Annual communication with all suppliers to reinforce expectations and gather insights into how they manage modern slavery risks.
- Targeted engagement with high-risk suppliers, including follow-up discussions to review their mitigation strategies and offer tailored support.
- Integration of modern slavery risk assessments into the pre-planning stage of the procurement lifecycle, ensuring early identification and mitigation of potential risks.
- Customisation of tender documentation based on risk assessment outcomes, reinforcing our commitment to ethical sourcing.
- Inclusion of compliance with the Modern Slavery Act as a mandatory tender condition, supported by random audits to verify adherence.
- Collaboration and benchmarking with other Water Authorities.

Coliban Water improved data capture and analysis by trialling Microsoft Forms for survey collection and Excel-based risk assessments. Discussions with internal Safety Team considered the potential for storing questionnaire responses in Lucidity, our contractor management system. However, with the development of Coliban Water's new Commercial Management Platform, Oracle, it is anticipated that there will be more streamlined and effective integration of modern slavery data and reporting mechanisms available within the system.

Importantly, no instances of potential modern slavery risks were reported to Coliban Water during this period. While this is a positive indicator, it also presents a challenge in evaluating the practical effectiveness of our engagement strategies. The absence of reported incidents may reflect either a low-risk environment or underreporting, underscoring the need for continued vigilance and proactive engagement.

Looking ahead, Coliban Water is committed to refining this approach by deepening engagement with key suppliers and enhancing the ability to assess risk management practices. These efforts will help Coliban Water better evaluate the impact of initiatives and ensure continuous improvement in the approach to addressing modern slavery.

<b>Actions for 2025/26</b>	<b>Target Date 30 June 2026</b>
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 **Organisational Policies and Documentation**  
Ensure all organisational policies are assessed against the *Human Rights Act 2006*, prior to being applied. Customise tender documentation to address Modern Slavery risks post Oracle implementation. Keep Modern Slavery as a condition of tendering.

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 **Employee Inductions**  
Continue to ensure that Modern slavery is included in employee inductions as well as our procurement procedures and templates, including tendering templates.

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 **Collaboration**  
Collaborate with suppliers to build trust, transparency, and reduce the risk of negative impacts to people in our supply chains. Collaboration and benchmarking with other Water Authorities to reduce the risk of Modern Slavery across the industry.

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 **Communication**  
Communicate annually with suppliers regarding how they are managing their own Modern Slavery risks.

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 **Review and Investigation**  
Conduct targeted follow-ups with high-risk suppliers to review their mitigation strategies and offer support. Investigate a supplier self-assessment questionnaire focused on reducing Modern Slavery risks through the Oracle Platform - Supplier Portal.

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## Consultation Process

We do not own or control any other entities and therefore this criterion is not applicable.

## Approval

This statement was approved by the Board of Coliban Water in its capacity as principal governing body of Coliban Water on 12 December 2025.

*Bob Cameron.*

**Bob Cameron**  
Chair

