

**Greater
Western
Water**

Modern Slavery Statement

October 2022



Acknowledgement of Country

The Greater Western Water region covers Bunurong, Wurundjeri, Wadawurrung, Dja Dja Wurrung and Taungurung Country.

We respectfully acknowledge the Kulin Nations as the Traditional Owners of the lands and waters upon which we work, operate and rely. We acknowledge the continued cultural, social and spiritual connections that First Nations people have with Country.

We recognise and value that First Nations people have cared for and protected Country for thousands of generations. Country describes land, water, air, sky, people, animals and spirits to which First Nations people are connected.¹

We are committed to working in partnership with local Traditional Owners and First Nations people, to harness collective wisdom to inform the future of the water management landscape while maintaining their cultural and spiritual connections to Country.

¹ Source: Australian Institute of Aboriginal and Torres Strait Islander Studies website

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About this statement

This is Greater Western Water's (GWW) first Modern Slavery Statement made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth). This statement covers the reporting period 1 July 2021 to 30 June 2022.

Greater Western Water (GWW) was formed on 1 July 2021, bringing together Western Water (WW) and City West Water (CWW) to meet the demands of our region and deliver reliable, affordable and secure water services, now and for decades to come.

GWW is proud to provide drinking water, recycled water, sewerage and trade waste services to one of the fastest-growing regions in Australia.

This statement outlines our approach to ensuring that GWW has comprehensive frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chains.

We acknowledge that slavery can occur in many forms, as detailed in the Modern Slavery Act, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

GWW is committed to operating responsibly, and establishing and adhering to the highest ethical standards with a goal of identifying and working with supply chains to eradicate the various forms of modern slavery.

The policies, processes and actions described in this statement apply across our organisation.

Reporting entity

This statement is made by GWW as a reporting entity with the below details:

Greater Western Water
36 Macedon St, Sunbury VIC 3429
ABN 70 066 902 467

Previous statements have been submitted by the two legacy entities:

City West Water
1 McNab Ave, Footscray VIC 3011
ABN 70 066 902 467

Western Water
36 Macedon St, Sunbury VIC 3429
ABN 67 433 835 375

Our structure, operations and supply chains

Our structure

On 1 July 2021, GWW was formed by bringing together Western Water (WW) and City West Water (CWW).

GWW is a statutory water authority incorporated under the *Water Act 1989*. We provide drinking water, recycled water, sewerage, and trade waste services to more than 550,000 residential customers and 46,000 business customers.

Our service area covers 3,700 square kilometres, stretching from Melbourne's CBD, inner and north-western suburbs through the Melton and Sunbury growth corridors to Bacchus Marsh and the Macedon Ranges. The local government areas of Brimbank, Hobsons Bay, Maribyrnong, Melton, Moonee Valley, Wyndham and Yarra are within our service area, as well as parts of the local government areas of Hume, Macedon Ranges, Melbourne, and Moorabool.

The Maribyrnong and Werribee Rivers are the major waterways in our region and the source of some of the water we supply to customers.

GWW manages a \$3.7 billion infrastructure asset base including 17 large dams, 10 recycled water plants, 7 water filtration plants and 7 sewage treatment plants in conjunction with 7,500+ km of water mains and 6,400+ km of sewer mains. In 2021–22, GWW supplied approximately 113 billion litres of drinking water, 6.4 billion litres of recycled water and collected 108 billion litres of sewage and wastewater.

Our operations

GWW provides trusted water and wastewater services to Melbourne and the fast-growing western region.

We supply drinking water and recycled water to homes, community places, businesses and industry. We take away wastewater (water from toilets and drains) and treat it so it can be re-used or returned to the environment.

We make sure water and wastewater services are reliable, affordable and secure for decades to come. This includes investing \$3.275 billion over the next ten years to build and upgrade the

pipes, pumping stations, plants and equipment that make up our water and sewerage system. Our 2030 Strategy sets out our vision for 'Thriving people and Country' and commits us to:

- delivering value for our customers
- supporting communities to thrive
- healing and caring for Country.

GWW is focused on ensuring that its approach to modern slavery is firmly aligned with the above strategic outcomes.

GWW service area



Our structure, operations and supply chains

Our operations include these key business areas:



Drinking water

GWW is committed to providing customers with high quality and safe drinking water. We have a rigorous water treatment and monitoring process in place to ensure our drinking water is safe and to the standard that is required by its customers. Having access to multiple sources ensures we can meet demand, cater for a growing population and manage water supplies when inflows are low.



Recycled water

GWW provides recycled water (wastewater that has been collected and appropriately treated so it can be reused) to business, agriculture and residential customers for non-drinking purposes, such as flushing toilets, washing clothes, watering sports grounds, irrigating crops and for use in manufacturing.

Recycled water provides an alternative water supply, helping save precious drinking water.



Sewerage

GWW's sewerage system functions to transfer sewage from customers properties to the wastewater and recycling plants without spilling. We are committed to meeting a high environmental standard, ensuring the sewerage system is free of spillage and blockages and that faults are quickly detected and rectified. Collected wastewater is treated to produce recycled water.



Trade waste

GWW's sewer network accepts trade waste to support business and industry. We help food businesses minimise the risk of fat blockages in our network and we monitor trade waste and audit site activities so the sewer network functions effectively.



Biosolids

GWW produces biosolids that meet the quality prescribed by the Environment Protection Authority (EPA). Biosolids are a nutrient-rich organic material produced from the wastewater recycling process. When applied under the right conditions, biosolids can be used as fertilisers, soil conditioners, structural material and compost.

Our supply chains

GWW spends \$280+ million each year on services and products to aid its operations and capital works.



Construction (\$95m + annual spend)

Services that support GWW's capital works projects include:

- direct professional services (engineering design, architects etc)
- general contractors
- civil services



Operations/maintenance (\$115m + annual spend)

Services that support GWW's day-to-day field operations include:

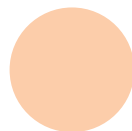
- general maintenance
- cleaning
- chemical supply
- operational technology
- metering



Information technology (\$30m + annual spend)

Services and products that support GWW's online and intranet infrastructure include:

- IT consulting
- software licenses
- software maintenance and support
- computer hardware



Indirects (\$40m + annual spend)

- legal services
- consulting services
- recruitment
- travel

Modern slavery risks

GWW acknowledges that modern slavery risks may be present in the operations and supply chains of companies operating in the water industry, including itself. Together with our water industry peers, we are committed to reducing and eliminating the risks associated with modern slavery.

While modern slavery can occur in Australia, there is a low risk of it occurring within GWW's direct operations. Our workforce is primarily based in an office or in field operations, working in accordance with Australian workplace laws. We have a rigorous governance framework and policies, including a whistleblower hotline, that outline our commitment to provide all employees with a safe and fair workplace.

While risk within our direct operations may be small, we understand that risks within our supply chain are greater. GWW is a committed member of the VicWater Water Industry Social Value in Procurement Working Group (WISVPWG) which collaborates across the water industry to use its purchasing power to achieve social outcomes. Working together allows us to share information and promote consistency in policy, processes, reporting and strategic approaches in supply chain analysis.

The working group is focused on fighting the risks of modern slavery within our industry's supply chains. A 2019 supply chain risk assessment of tier 1 suppliers helped identify the hotspots where modern slavery risks are most prominent. This assessment has helped prioritise areas to focus attention and achieve the best results.



Modern slavery hotspots

Modern slavery poses a higher risk in areas that rely on:

- migrant or overseas workers
- low skilled labour
- materials from high-risk geographies/countries
- manufacturing within low-cost countries.

The following items/activities were identified as high risk within GWW's supply chain categories:

Construction

- construction labour
- offshore engineering services
- mechanical and electrical equipment

Operations

- maintenance of facilities (including cleaning)
- grass cutting
- herbicide application/ edge treatment
- chemical products

Information Technology

- offshore IT services
- electrical equipment

Indirect

- temporary staff
- labour hire and traineeship programs
- security
- debt collection
- customer research services

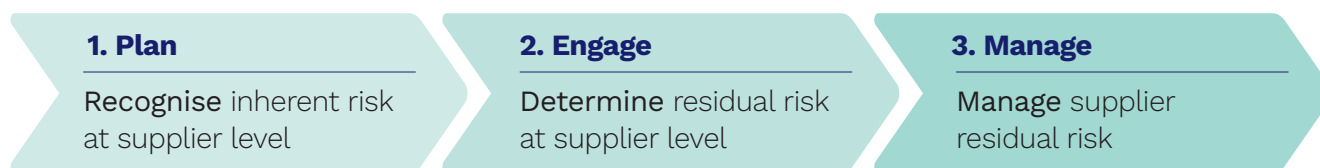


Addressing and managing **modern slavery risks**

GWW became a signatory member of WISVPWG in 2015. Since the *Modern Slavery Act 2018* passed, WISVPWG has taken several steps and initiatives to develop and implement a program to manage and mitigate modern slavery risks in the supplier base of the water industry.

The initial phases of the program involved understanding the supplier base and identifying the hotspots to be prioritised. The next phase focused on developing toolkits, educational material and training to help gain a better understanding of the risks exposed by

suppliers and raise overall awareness and understanding of modern slavery. These materials were piloted amongst a cross-section of GWW’s supplier base and reviewed based on the feedback.



Documents and toolkits developed for each part

- a. VicWater member education material
- b. Labour rights (incl. modern slavery) risk identification tool and guidance
- c. Supplier education material

- a. Supplier questionnaire and guidance
- b. Supplier continuous improvement guidance

- a. Checklist for monitoring supplier compliance
- b. Grievance and remediation checklist

Addressing and managing our modern slavery risks

Modern slavery questions have been included in the tender returnable for procurement activities that have been conducted in the past. These questions have allowed GWW to gain an understanding of the risks that a potential supplier is exposed to, the procedures and policies they have in place to minimise and mitigate modern slavery risks, and their overall awareness and understanding of modern slavery.

The key focus area in the next 12 months for GWW will be further piloting the documents and toolkits developed as part of WISVPWG. We will continue to collaborate with suppliers to build trust and transparency to reduce the risk of negative impacts to people in our supply chains. We will issue the developed materials to our top 20 suppliers (based on annual spend). Responses to the questionnaire will help us gather data about the risks that each supplier is exposed to and enable us to flag high risks. A lack of response from suppliers will also be flagged as a high risk. The feedback from this phase will inform how we can use the tools as part of our procurement processes.

There is also an intention to expand the risk assessment to the supply chain by reviewing tier 2 suppliers via the working group.

The Victorian Fair Jobs Code will come into effect on 1 December 2022. This code ensures suppliers and businesses applying for GWW contracts must hold a Fair Jobs Code Pre-Assessment Certificate. This certificate allows the Victorian Government to use its purchasing power to promote secure employment and fair labour standards and to ensure compliance with employment, workplace and industrial laws.

As part of GWW's process of aligning to the Victorian Government Purchasing Board (VGPB) policies, we will publish a 12–24-month forward procurement plan that gives an overview of what the agency is planning to buy at either a category and/or individual procurement level. This procurement plan will help identify which future procurement activities fall inside the identified hotspots.

The longer-term goal for the water industry is to create a portal where suppliers can register to receive modern slavery accreditation. This will allow GWW (and other water industry corporations) to identify suppliers that have been vetted for their modern slavery risks. Talks and planning for this platform are at the initial stage.

Approach to date

2015

Creation of VicWater Social Value in Procurement Working Group

2018

Australian *Modern Slavery Act 2018*

Phase 1 - Modern slavery becomes a key initiative for the VicWater Working Group

2019

Phase 2 - Supply Chain Risk Assessment to identify priority areas

2020

Phase 2 - Program development to manage modern slavery risks

Phase 2 - Data collection on water corporations' awareness/training, policies, guidelines, tools and communication

Phase 2 - Engagement of specialist Human Rights Consulting team – KPMG Banarra

2021

Phase 3 – Development of modern slavery statements and content

Modern Slavery clauses standard in all GWW contracts

Phase 3 – Procurement toolkit development, planning and rollout into Request for Proposal (RFP) documents

2022

Phase 4 – Development of industry educational material

Phase 4 - Socialisation of education material, questionnaires, and training with top suppliers

Phase 4 – Planning of a supplier portal to receive water industry modern slavery accreditation

Modern slavery governance

GWW's central procurement team has the responsibility of overseeing and managing the risks associated with modern slavery. This includes implementing and overseeing the rollout of the initiatives that are discussed

as part of the broader WISVPWG. The team reports and makes recommendations to the Executive Leadership Team and the Board where required, through reporting papers and presentations.

Policy

GWW adheres to the VGPB Supplier Code of Conduct. As an agency of the Victorian Government, GWW is committed to ethical, sustainable and socially responsible procurement. The VGPB Supplier Code of Conduct describes minimum expectations in the areas of integrity, ethics, conduct, conflict of interest, gifts, benefits and hospitality, corporate governance, labour and human rights, health

and safety, and environmental management. You can view the full policy at <https://www.buyingfor.vic.gov.au/supplier-code-conduct>.

The Fair Jobs Code that will come into effect on 1 December 2022 can be viewed at <https://www.buyingfor.vic.gov.au/fair-jobs-code-fact-sheet>

Remediation process

Our people involved in purchasing decisions and managing supplier relationships will be provided with training when they join the organisation or as soon as practicable before engaging with a new Request for Tender (RFT), contract extension or renegotiation. There will also be a requirement to complete refresher training on a regular basis or as part of the organisation's internal response if human rights-related grievances from suppliers (including their employees) are received or substantiated.

The development of a Grievance and Remediation Checklist will provide key considerations for our organisation to manage instances where we suspect or know that a supplier is non-compliant with labour standards or modern slavery legislation.

In 2022-23, we will work on these key elements of our remediation processes:

1. Enabling grievances to be heard including:
 - putting in place an effective grievance mechanism
 - managing a grievance.
2. Managing remediation including:
 - how to set up and communicate a remediation process
 - what an immediate response to an incident should look like.
3. Managing the supplier including:
 - how to communicate with the suppliers
 - How to develop a corrective action plan with them.

Assessment of effectiveness

The establishment of WISVPWG as a community of practice has increased transparency and knowledge-sharing between Victoria's water corporations. By collectively identifying and addressing common sustainability issues, including human rights, and working together to capture opportunities, this group is more rapidly able to determine which actions are consistently effective in achieving their desired outcomes, and share the lessons learned.

Bringing the water corporations together introduces a level of accountability to each other to contribute to the progress of initiatives, which sets the group up for a culture of continuous reflection and improvement. The WISVPWG has fostered a culture of continuous improvement by inviting third party specialists to support the development of the work program, co-design and facilitate category strategy development

workshops and co-design and facilitate modern slavery capability building workshops. By seeking external guidance and insight, the WISVPWG is challenged and aided to understand where they have been effective in collectively addressing modern slavery in their industry's supply chains and to identify opportunities to improve their approach.

The WISVPWG meets quarterly to assess complete and ongoing initiatives. The group is reviewed annually with a new chair to the working group appointed yearly.

Consultation

GWW's Procurement Team was consulted in the preparation of this statement to ensure that it accurately reflects modern slavery awareness, risks and actions that apply across the organisation and its business units.

Board approval

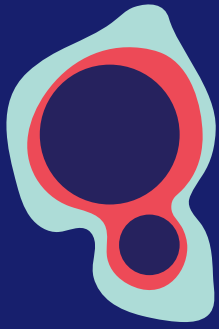
Signed By:

A handwritten signature in black ink, appearing to read "David A. Middleton".

David Middleton (Chair)

Date: 22/12/2022





**Greater
Western
Water**

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