



Modern Slavery Statement 2025



Index



From our CEO	3
Governing body approval	3
Criteria 1 & 2: Reporting entity, operations and supply chains	4
Criteria 3: Risks of modern slavery practices	6
Criteria 4: Mitigating actions to address modern slavery risks	8
Criteria 5: Assessing effectiveness	10
Criteria 6: Consultation	11
Statement Annexure	13



From our CEO

Established in 2001, Guidera O'Connor is a privately-owned company operating Australia wide, with a reputation for collaboration, innovation, and quality workmanship.

We strongly support our community with undergraduate internships, apprenticeships, indigenous employment and we are ongoing sponsors of WaterAid and the Australian Water Association.

Guidera has a deep commitment to our 5 guiding principles, which shape our business decisions and strategies. They are our foundation and remain integral to our continued success over the last 24 years. We work to the highest standards of business ethics and are committed to addressing human rights abuses and the risks of modern slavery in our business and supply chains.

This document, our second Modern Slavery Statement, applies to the 2025 Financial Year and addresses Guidera's obligations under the Modern Slavery Act 2018 (Cth).

It describes the actions Guidera has taken so far to address modern slavery risks and outlines the procedures we have in place. It also summarises our performance over the last year and sets out our plans over the next 12 months to improve our processes.

Richard Trapp
Chief Executive Officer

Governing body approval

This statement was approved by the Board, in their capacity as the Principal Governing Body of Guidera O'Connor, on 12 December 2025.

Mick O'Connor
Board Chair

Criteria 1 & 2: Reporting entity, operations and supply chains



This Modern Slavery Statement is made on behalf of Guidera O'Connor Pty Ltd (Guidera) ABN 71 099 012 870 for the reporting period ended 30 June 2025 pursuant to the Modern Slavery Act 2018 (Cth).

Registered office

Guidera's registered office and principal place of business is 31 Holland Street, Thebarton SA 5031.

Structure and operations

Established in 2001, Guidera is a privately-owned company operating Australia wide, with a reputation for collaboration, innovation, quality, and a solution-focused approach.

From desalination plants providing clean water to Australian communities, to treatment facilities that return wastewater safely to the environment, Guidera designs and delivers tailored solutions that make a real difference to people's lives.

Guidera designs, constructs, and commissions:

- Water treatment plants
- Pumping stations
- Chemical dosing systems
- Filtration
- Odour control
- Desalination plants
- Aquifer storage and recovery
- Reuse systems.

We work with customers across Australia, including:

- Water authorities
- Local government
- Mining and resources companies
- Private asset owners
- Head contractors
- Engineering organisations.

Our business is founded on five guiding principles: Care, Integrity, Passion, Respect, and Future. We highly value our employees, providing them with a welcoming, supportive and comfortable working environment, advancement opportunities, and mentoring programs.

We employ more than 200 people, with a diverse team of project and design managers, construction managers, engineers, drafters, supervisors, trades people, apprentices, contract administrators, HSEQ professionals, undergraduates, and support staff. Guidera has a large in-house design team and use the latest BIM technology to create detailed 3D and Virtual Reality models, complementing the design work of our consulting partners.

At Guidera we maintain close, ongoing relationships with our clients, consultants, suppliers, and subcontractors, and have delivered more than 500 water projects throughout Australia.

Supply chains

Project-related suppliers and subcontractors:

- Civil infrastructure
- Mechanical plant and equipment and installation
- Electrical plant equipment and installation
- Electrical controls and installation
- Professional consulting services for design and engineering
- Bulk earthwork and landscaping services
- Hire of equipment.

Corporate services

Guidera's supply chains also extend to services that contribute to our corporate operations, such as:

- Food services
- Cleaning services
- Medical, PPE and workwear supply
- IT and telecommunications equipment
- Stationery supply
- Casual labour hire
- Insurance
- Professional services (such as legal advisors and auditors)

Materials

- Chemicals
- Concrete
- Steel
- Piping
- Asphalt.

We generally do not manufacture our own products, except for dosing chemical units.



Criteria 3: Risks of modern slavery practices

During the first and second reporting periods for Guidera O'Connor (2023-2024 FY and 2024-2025 FY), we have conducted risk scoping exercises to ascertain categories of risk within the continuum of conduct including risks that Guidera O'Connor may cause, contribute to, or be directly linked to, in line with the UN Guiding Principles¹.

During these exercises, we have ascertained that Guidera's risks of modern slavery practices do not always fit neatly into just one of these categories.

Guidera O'Connor recognises the importance of our human rights responsibilities and the risks to people and to the business when human rights are violated.

We acknowledge and are committed to ensuring we understand any risks within our business and that we will put in place controls to address such risks. We will implement robust reporting and review processes to ensure we continue to evolve our approach to managing these.

This includes continual reviews to identify any changes over time, such as risks relating to new suppliers. Focusing on risks of harm to people highlights the connection between modern slavery practices and other human rights.

Geographic Risks

Guidera O'Connor only delivers projects within Australia. We have a strong emphasis on the engagement of local small to medium enterprises and the use of products and supplies that are locally manufactured or purchased through local suppliers who comply with all required legislation and regulations.

Australia is a low-risk jurisdiction for modern slavery according to the Global Slavery Index² with a low vulnerability score and low slavery prevalence.



Sector and Industry Risks

Guidera acknowledges that construction is a high-risk sector. Where certain construction work leaves temporary migrant workers as vulnerable to deception in relation to work contracts and other exploitative practices.

Other potential causes include the outsourcing of labour, workers being poorly paid and working long hours, workers undertaking physically demanding work or working in unsafe conditions, and goods being procured from overseas where there is little oversight of working practices.

During our scoping practices and given our assessments and mitigations detailed further in Criteria 4, we have assessed the likelihood of this within our continuum of conduct to be low.

Worker Vulnerabilities

Guidera O'Connor has approximately 200 directly employed personnel. In addition to our directly employed personnel, Guidera sub-contracts labour for services and where required, attains casual labour hire from recruitment agencies.

Guidera acknowledges that there may be vulnerabilities within labour hire relating to women, migrant workers, and young workers. During our scoping exercises, we have assessed the likelihood of this within our continuum of conduct to be low. We detail this deeper within Criteria 4.

Goods/Materials Risks

Guidera O'Connor acknowledges the risks of modern slavery within our supply chains as detailed in Criteria 2.

Whilst we are conscious to only obtain supplies through locally manufactured Australian companies, and that this business strategy minimises the risk of Modern Slavery practices within our direct supply chain, at times there may be specific equipment or materials required for a project to meet our clients' needs or requirements that is only available overseas.

We also acknowledge that we may not have full visibility over the second and subsequent tiers of our supply chain.

Whilst our business strategies focus on maximising investment into local economy and minimises exposure to high-risk geographic regions, we know that our priority risks exist in those subsequent tiers.

Therefore, our priority mitigation strategies are outlined in Criteria 4.



Criteria 4: Mitigating actions to address modern slavery risks

During our second reporting year, Guidera O'Connor has taken a targeted, risk-based approach to understanding and assessing our priority risks within the risk factors of Sector/Industry and Goods/Materials, as well as assessing the risks within the other risk factors of Worker Vulnerabilities and Geographic Regions.

Priority focus was given to assessing the subsequent tiers of our supply chain with low visibility. To support the risk and compliance team, we have also focused on educating our executive, management and key personnel by rolling out Modern Slavery Training and briefing on the risk assessments conducted during the period.

In addition to this approach, during the reporting period Guidera has developed a company-wide Positive Duties Commitment encompassing our duties as an entity to identify, prevent, mitigate and remedy actual or potential unlawful conduct as far as possible. We recognise that our positive duties are about being proactive in preventing harm, unlawful behaviours connected to work, and psychosocial hazards before they happen.

We recognise that modern slavery risks are more likely to exist where human rights principles are not respected. Our Positive Duties Commitment addresses reasonable and proportionate measures in leadership, culture, knowledge, risk management, support, reporting and response, and monitoring and evaluation.

During this reporting period, Guidera also reviewed and revised our Business Code of Conduct to clarify our standards in relation to workplace behaviour, modern slavery, human rights and inclusion, safety, and other relevant issues. The risk of modern slavery in our core business of designing and construction of sustainable water infrastructure and facilities is being managed through our targeted approaches, which has included the review of our supplier and sub-contractor arrangements.

Guidera has been pragmatic and proportionate in our measures, ensuring the approaches can be met by suppliers of all sizes and types.

This has included the following:

- Identifying and working with companies that are known to us and that have standards that are aligned with our own.
- Establishing clear expectations with our supply chain.
- Conducting thorough pre-qualification assessments of all vendors (suppliers and subcontractors) prior to engagement, including confirmation of the suppliers' quality assurance policy and management, work health and safety policy, management, and consultation, work health and safety risk assessments, safe work practices, (transport and cranes) chain of responsibility, exposures, training, environmental policy and management, industrial relations, insurance coverage, Indigenous participation, ethical sourcing, and modern slavery.
- Incorporating terms and conditions relating to modern slavery in awarded contracts. Our contracts specifically require our suppliers to act in accordance with all relevant legislation and regulations conducting reviews of suppliers during performance to identify potential issues.



The risk of modern slavery in our direct workforce is managed through our compliance with employment and human rights legislations which is implemented and monitored through our highly developed management systems and includes the following:

- All employees have a formal contract of employment which is covered by either:
 - Enterprise agreements
 - Modern Awards
 - Common Law provisions under the Fair Work Act 2009 (Cth)
- Statutory entitlements such as superannuation, accrual of leave entitlements, and redundancy and workers compensation managed in accordance with the relevant industrial instrument, employment contract, Guidera policies and legislated statutory obligations.
- We have a dedicated People and Culture (P&C) team that recruit and onboard new employees in accordance with robust P&C policies and procedures which include:
 - Pre-employment screening procedures to ensure working rights and employment checks are conducted; and
 - Preparing employee employment contracts which include all necessary provisions under the industrial instrument and legislated requirements.
- Our induction process ensures that all new employees are provided with information about their workplace rights and our policies and procedures, including but not limited to:
 - Grievances and Complaints Procedure
 - Workplace Behaviour Policy
 - Respectful Workplace Conduct Procedure.
- We provide regular training to all staff on Respectful Workplace Behaviour.
- We provide regular communication to all employees.

- We consult with employees about proposed workplace change which have potential for impact on employees and contractors.
- We commit to our Positive Duties under sexual harassment and discrimination legislations as well as psychosocial health and safety.



Criteria 5: Assessing effectiveness



Guidera O'Connor recognises that we are at the foundational stage and will continue to develop our system to manage modern slavery risks across our business and supply chain.

For the preventive and mitigating control measures we have put in place during our first and second reporting year, Guidera has committed to testing the effectiveness of those controls through examination, observation, and evidence-based tests to show whether they have the intended or desired effect.

Guidera has dedicated risk, compliance and quality personnel who manage the control effectiveness testing programs.

The first round of effectiveness testing will focus on the due diligence process in place for suppliers, and the pre-employment screening procedures verifying rights to work.

We recognise that our assessment of control effectiveness will be an ongoing and evolving process that we are committed to building upon. To this end, control effectiveness testing will continue to take place bi-annually.

In addition, the next reporting period will see Guidera begin to develop risk metrics for modern slavery to measure and report on focus areas. These will include the number of suppliers completing our modern slavery questionnaire, and completion rates for modern slavery awareness training.

Over subsequent reporting periods, we will continue to review and enhance these metrics and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

Criteria 6: Consultation



Guidera O'Connor does not own or control any other entities.

Whilst Criteria 6 and 7 are not applicable to our entity or statement, this Modern Slavery Statement has been prepared in consultation with key internal stakeholders at Guidera.

These stakeholders include:

- Commercial & Procurement
- Workplace Relations & Compliance
- People & Culture
- Senior Leadership Group
- Executive Leadership Team
- Board of Directors.





Statement annexure

The table below identifies the relevant headings in this statement and how they align to Section 16 of the Modern Slavery Act 2018 (Cth) (Criteria for Modern Slavery Statements).

Mandatory criteria	Pages
Criteria 1: Identification of Reporting Entity	4–5
Criteria 2: Reporting Entity's Structure, Operations, and Supply Chains	4–5
Criteria 3: Reporting Entity's Modern Slavery Risks	6–7
Criteria 4: Risk Mitigation Actions	8–9
Criteria 5: Assessment of Effectiveness	10
Criteria 6: Consultation	11
Criteria 7: Any other Relevant Information	-

End notes

1 https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

2 <https://www.walkfree.org/global-slavery-index/map/>



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