



MODERN SLAVERY STATEMENT

2023

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A MESSAGE FROM OUR CEO



In Australia and New Zealand, Veolia employs more than 6,500 employees in over 330 locations. People are at the core of what we do as a global champion of Ecological Transformation, permanently acting to reconcile human progress and environmental protection.

We are committed to ensuring our impact on our community, through employment, supply chain and our operations, is ethical, fair and in the best interests of people and our environment.

Our purpose is to contribute to human progress by firmly committing to the Sustainable Development Goals set by the UN to achieve a better and more sustainable future for all.

In 2024, we are launching our 2027 Strategic Program called **GreenUp**. The strategic program, aligned with our Purpose of Ecological Transformation, sets out our clear goals to protect, restore and renew our precious resources, focusing on areas of greatest impact for the environment and climate.

In line with our Purpose and our Strategic Program, our Modern Slavery Statement declares our commitment to identify, manage and mitigate the risks of modern slavery. Veolia will continue to strive for improvement across our organisation in Australia, New Zealand and across our global footprint.

Richard Kirkman
CEO and Managing Director
Veolia Australia and New Zealand

This statement has been published in accordance with the Modern Slavery Act 2018.

During the financial year ended 31 December 2023 (“FY23”), the reporting entity (“Veolia”), as detailed in the “Reporting Entity” section of this statement, reported an annual consolidated revenue in excess of \$100m. This statement constitutes Veolia’s Modern Slavery Statement for the financial year ended 31 December 2023.

This Modern Slavery Statement outlines the steps we have taken to identify, manage and mitigate the risks of modern slavery in our operations and supply chain, aiming at achieving a ‘Modern Slavery Free’ environment.

This statement was approved, on 15 May 2024, by Veolia’s Executive Committee in its capacity as principal governing body of all entities listed in the “Reporting Entity” section of this statement. The statement has been signed by the CEO and Managing Director of Veolia in Australia and New Zealand (“ANZ”). The reporting entity includes, among others, Veolia Holdings Australia Pty Ltd and its wholly owned entities Comgen Australia Pty Ltd, Veolia Recycling & Recovery Holdings ANZ Pty Ltd, Veolia Water Australia Pty Ltd, Veolia Energy Services Australia Pty Ltd.

INTRODUCTION



WHAT IS MODERN SLAVERY?

Modern slavery is an umbrella term used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is defined by eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour, where children are subjected to slavery or similar practices. It does not include practices like substandard working conditions or underpayment of workers, however, tolerance of less severe abuses can create the conditions that allow modern slavery to occur.

ACKNOWLEDGEMENT OF COUNTRY

At Veolia, we respect and connect to Country and our community. We endeavour to be a positive contributor to society, behaving ethically and with respect for all people, welcoming diversity of thought, background and experience.

In Australia, we acknowledge the Aboriginal and Torres Strait Islander people as the original custodians of our land, and are committed to walking alongside them to connect, learn, and create sustainable opportunities in the communities in which we live and operate.

In New Zealand, we recognise the Maori people as the Tangata Whenua Aotearoa (people of the land NZ), and the Tiriti o Waitangi (Treaty of Waitangi) which is committed to the inclusion of all people.

ABOUT VEOLIA AUSTRALIA AND NEW ZEALAND

Our Purpose at Veolia is to ensure that humans can continue to thrive.

We are here to clear up, to clean, to recover, to recycle and to provide renewable energy and sanitised water.

In Australia and New Zealand, we are proud to partner with our customers and cities to develop clean, low-carbon, water resilient and digital operations; balancing the needs of growth with environmental sustainability and community acceptance.

Veolia is an ethical organisation where the values it proclaims contribute to establishing its legitimacy as a company.

As a leading ESG company globally, we will achieve a 50% reduction in our carbon impact no later than 2032 (relative to our 2022 baseline), and align with a 1.5 degree pathway to net zero by 2050. These ambitious goals align with our “GreenUp” 2027 Strategic Program.

The GreenUp Strategic Program sets clear goals to accelerate our:

- Decarbonisation: 50% reduction in carbon emissions by 2032, by prioritising the use of local renewable energy sources in our operations;
- Regeneration: protection of resources by scaling up water reuse, preservation of fresh water and enabling more materials recycling;
- Depollution: preventing pollution by collecting and treating more hazardous waste.

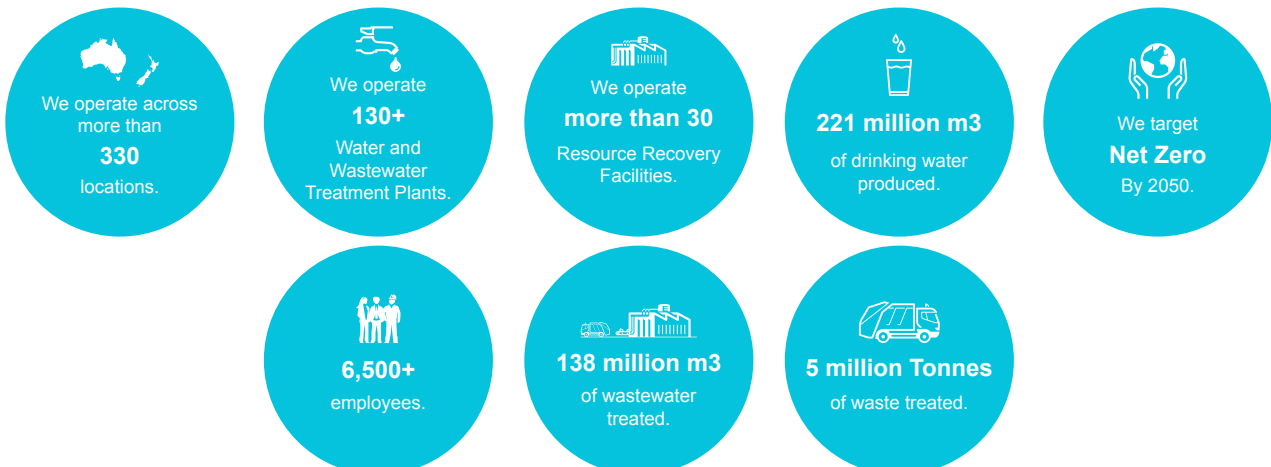
By accelerating our essential role in global ecological transformation, Veolia is positioning itself to be a key player in building a sustainable future.

Everyday our 6,500+ employees are collecting waste, recovering materials and energy, remediating the land and water, treating pollution, and producing clean drinking water. At the very heart of our purpose is Veolia’s usefulness to society and customers in achieving Ecological Transformation, to create long term solutions and pathways that enable our society to live healthy, well and quality lives, in balance with our environment.

This includes taking a proactive stance against modern slavery and the conditions that enable it. Veolia is committed to applying and ensuring compliance with its modern slavery policy among its employees, as well as promoting that policy among its other stakeholders, customers, subcontractors and suppliers. Veolia expects all stakeholders to conduct their activities with respect for human rights, in accordance with the Modern Slavery Act 2018.

At Veolia, we are convinced that continuing human development is only possible if economic, social and environmental issues are addressed as an indivisible whole. This belief is embedded in the history of the company, which, as soon as it was created in 1853, showed the way by making access to drinking water an essential element of public health and quality of life.

We celebrate our past, with a focus on our future. With more than 170 years of global experience, and a local genesis over 50 years old, we have a solid foundation of expertise. We draw on this experience to create the water, waste, energy and industrial solutions that mitigate climate change, create liveable and resilient cities and foster harmonious communities.



REPORTING ENTITY

This statement applies to Veolia Holdings Australia Pty Ltd (ABN 82 663 593 093) and its respective wholly owned entities Comgen Australia Pty Ltd (ABN 17 050 242 441), Veolia Recycling & Recovery Holdings ANZ Pty Ltd (ABN 30 070 452 890), Veolia Water Australia Pty Ltd (ABN 99 061 161 279), Veolia Energy Services Australia Pty Ltd (ABN 36 122 191 208) as well as to:

- Their respective wholly owned entities; and
- The entities over which these have control.

These include, but are not limited to:

Veolia Environmental Services (Australia) Pty Ltd ABN: 20 051 316 584	Western Resource Recovery Pty Ltd ABN: 91 099 144 180
Veolia Water Utilities (Aust) Pty Ltd ABN: 71 072 158 108	Veolia Energy Technical Services Pty Ltd ABN: 46 064 584 587
Veolia Water Operations Pty Ltd ABN: 14 061 161 297	Veolia Energy Solutions Pty Ltd ABN: 30 129 471 558
Veolia Water Services (ANZ) Pty Ltd ABN: 64 069 471 334	North West Alliance Pty Ltd ABN: 25 164 277 614
Veolia Water Services ANZ Pty Limited NZBN: 942 903 813 4586	Veolia Water New Zealand Ltd NZBN: 942 903 136 6038
Bendigo Water Services Pty Ltd ABN: 68 087 333 088	Ti Tree Bioenergy ABN: 67 450 387 919
Veolia Recycling & Recovery ANZ Pty Limited ABN: 18 002 658 255	Veolia Recycling & Recovery Pty Ltd ABN: 70 002 902 650
Veolia Recycling & Recovery (NSW) Pty Ltd ABN: 93 524 709 106	

“*Veolia*” refers to the group of entities defined above. This joint modern slavery statement covers all entities included in Veolia. All entities, defined as Veolia, work closely together and share policies and processes.

All entities referred to as Veolia are centrally managed from Veolia’s corporate head office located Level 4, 65 Pirrama Road, Pyrmont, 2009, NSW. These also share the same Executive Committee acting as principal governing body of Veolia (all entities listed above) in Australia and New Zealand. The CEO and Managing Director of Veolia, chairs the Veolia Executive Committee and is a member of the Board of Directors for each entity.

This statement, signed by the CEO and Managing Director of Veolia in Australia and New Zealand, was approved, on 15 May 2024, by Veolia’s Executive Committee in its capacity as principal governing body of all entities listed above.

Veolia, as described above, is part of the Veolia Environnement SA group of companies, headquartered in France. Veolia Environnement SA is a corporation listed on the Euronext Paris (VIE:PA). Veolia Environnement SA, as a Group, also complies with the French “*Corporate Duty of Vigilance*” Law. As such, Veolia Environnement SA publishes annually a [Vigilance Plan](#) that sets out how the Group meets the requirements of this legislation on human rights and fundamental freedoms, health and safety, serious environmental damage, suppliers and subcontractors.

OUR CAPABILITIES

Water And Wastewater Treatment

We work with local authorities, industrial and commercial clients to design, build, operate and maintain their water plants and networks. Our experience is coupled with the latest technological solutions for process water, ultrapure water, water and wastewater treatment, recycling and reclamation, and network solutions. We also offer service-based consulting to help clients manage their capital investment and optimise the management of their plants and networks.

Our water capabilities include:

- Water and wastewater treatment
- Operation and maintenance
- Recycled water for reuse
- Water for industry
- Digital monitoring and integrated smart solutions
- Network maintenance and rehabilitation

Industrial Services

Serving clients within heavy industries such as mining, oil and gas, and manufacturing;

Veolia can provide complete facilities management that is inclusive of:

- Industrial cleaning
- High Pressure Water Jetting
- Vacuum Loading
- Refractory Management
- Protective Coatings
- Drain Cleaning
- Mechanical Services
- Chemical Cleaning

Through a multi-technical solution, Veolia can also devise a suitable water and energy management plan that includes the operations and maintenance of on-site assets.

Waste Management And Resource Recovery

Providing environmental solutions for the collection and recovery of commercial and municipal waste, we work with clients to devise a custom waste treatment and recovery plan for their specific waste streams. Our focus is to realise opportunities to turn waste into a secondary resource; thereby, reducing waste related environmental impacts.

This is achieved by providing customers with:

- Waste assessments and reporting
- Solid waste collection
- Medical waste collection and treatment
- Liquid and hazardous waste collection and treatment
- Resource recovery and recycling
- Energy from waste
- Educational material

Energy Solutions

Delivering end-to-end solutions for energy supply and use, we are able to holistically manage energy performance contracts, district energy networks and industrial utilities.

Veolia can deliver sustainable energy management solutions through:

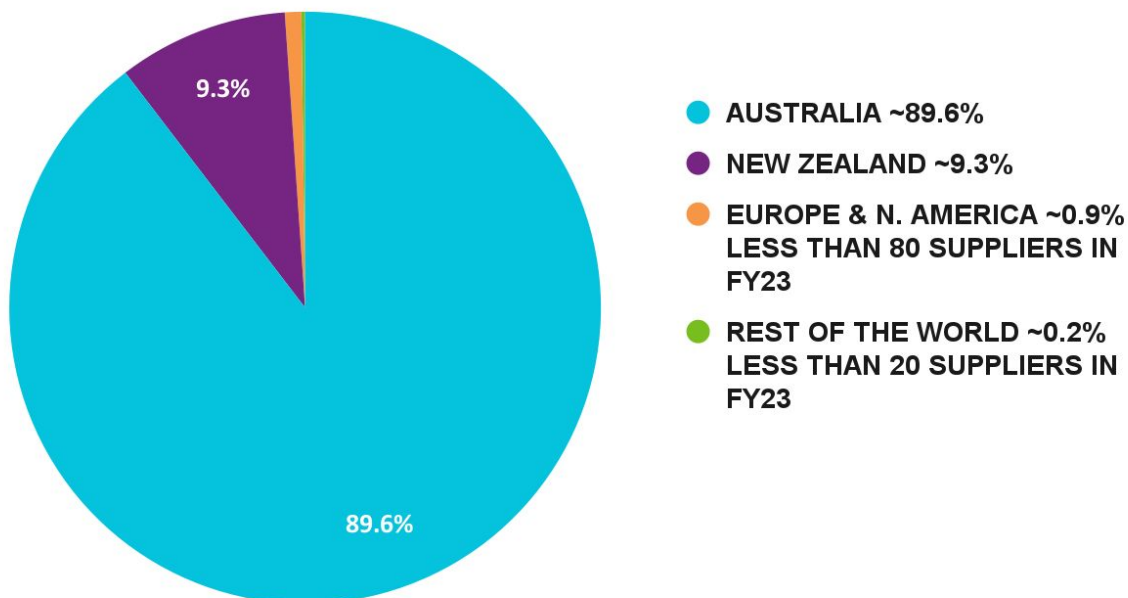
- Energy performance contracts
- Facilities management
- Building management systems
- Power generation
- District energy
- Carbon neutral and green energy solutions

OUR SUPPLY CHAIN

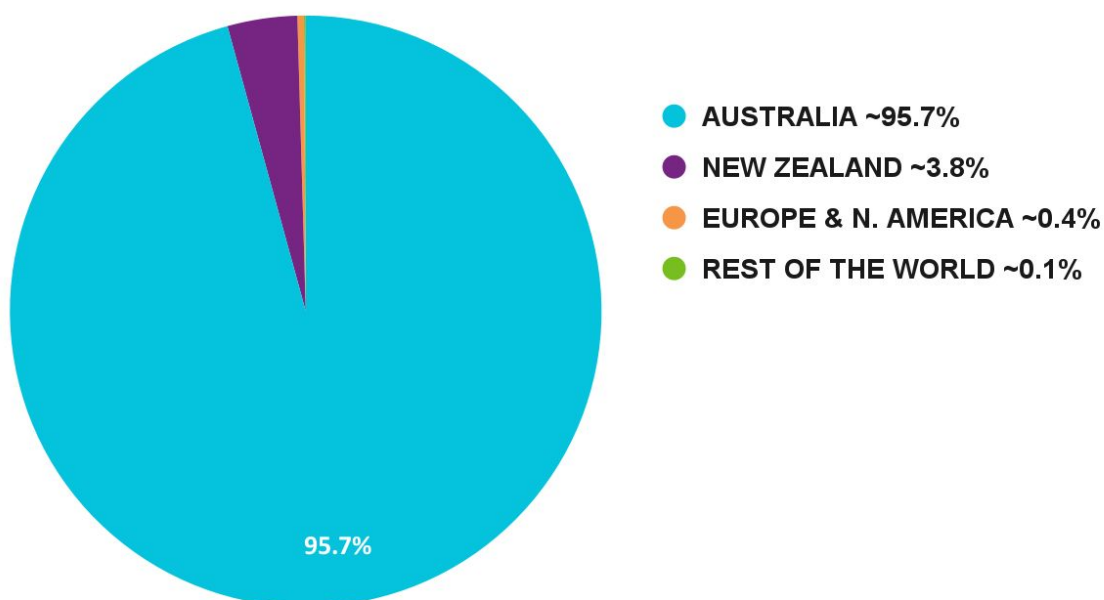
In FY23, Veolia worked with **approximately 9,000 direct suppliers**.

With the size of our operations, our supply chain is relatively complex. While we largely use suppliers based where we operate, we are supplied by all types of economic actors, from local businesses through to global companies.

Number of FY23 Suppliers used per Origin



FY23 Spend Related to Suppliers Location



SUMMARY OF VEOLIA'S SPEND CATEGORIES

Category	Typical products / services in the Category
 Industrial, Technical & Service Subcontracting (47% of FY23 spend)	<ul style="list-style-type: none"> • Waste and Treatment Subcontracting • New Works and Maintenance • Mobile Equipment Subcontracting • Subcontracting and Facility Management
 General Purchasing (12% of FY23 spend)	<ul style="list-style-type: none"> • Human Resources Services & Contingent Labour • Professional Travel • Health Safety Products Equipment (including PPE and Workwear) • Office Supplies • Regulatory and Non Regulatory Inspections
 Energy, Chemicals, Materials & Products (8% of FY23 spend)	<ul style="list-style-type: none"> • Energy Fuel and Combustibles • Organic and Mineral Chemicals • Recyclable Product
 Taxes, Usage Fees, and Royalties	<ul style="list-style-type: none"> • Customs duties • Infrastructure usage fees • Professional taxes • Waste-related taxes
 Intellectual Services	<ul style="list-style-type: none"> • Management, Strategy and Technical Consulting • Marketing and Communication • Insurance
 Mobile Equipment & Motorised Equipment	<ul style="list-style-type: none"> • Mobile Equipment Fleet • Removable Mobile Device Pre-Collection Equipment
 Operating Supplies, Materials & Equipment	<ul style="list-style-type: none"> • Automatic Systems, Electrical Equipment & Electronic Components • Building Materials • Transmission, Valves and Small Mechanical Components • Worksite Equipment
 Real Estate	<ul style="list-style-type: none"> • Real estate rental
 IT & Telecommunications	<ul style="list-style-type: none"> • IT Equipment • Software applications • Telecommunications

RISK ASSESSMENT



Veolia Environnement SA's risk mapping is based on its own methodology developed by the Group's Risk Management Department. The risk analysis methodology includes a combination of exogenous and endogenous factors which, put together, defined the overall risk mapping. Based on the internal risk assessment, mitigation action plans are developed and prioritised by geographies. Implementation of action plans is monitored closely.

The main risk mapping methods used are:

- Working groups participated in by functional departments;
- Questionnaires to encourage feedback to nurture analysis and reflections during the risk assessment; and
- Discussions between the head office and operations to ensure consistency, and feed the sorted results of the mapping process.

In Australia and New Zealand, Veolia uses the Veolia Environnement SA's risk assessment to further detail the local risks based on the exposure to certain countries, the industry we are operating in, and a number of other key risk factors.

In 2023, in order to maintain stability and consistency, the methodology used to determine the risk profile relating to Modern Slavery remained unchanged.

Nevertheless, in 2023, Veolia did a full Corruption Risk Mapping involving a large number of participants (more than 115). This exercise was based on the Group's global initiative of 33 corruption risk scenarios. This exercise has a bearing in identifying any corruption and wrongdoings, which by default include modern slavery. This exercise has confirmed our Modern Slavery Risk mapping as adequate.

IDENTIFIED MODERN SLAVERY RISKS

This risk mapping highlighted that Veolia's Modern Slavery main risk exposures lie with:

- Our Supply Chain generally, and more specifically with our industrial clothing provider, Temporary Labour and Agency Workers, as well as some of our external subcontractors; and
- Our direct use of Labour.

However, 98.9% of our active suppliers operate from Australia or New Zealand and these suppliers represented 99.5% of our FY23 spend.

As such, the assessment helped us to determine a **low exposure to Modern Slavery Risk**.

RISK MITIGATION & REMEDIATION

GLOBAL APPROACH

Globally, Veolia Environnement SA is committed to supporting and advocating for human rights. Veolia Environnement SA, headquartered in Paris (France) is subject to the French Corporate Duty of Vigilance Law (French law no. 2017-399).

The French Corporate Duty of Vigilance Law requires to develop a plan based on “*reasonable due diligence measures to identify risks and prevent severe impacts on human rights and fundamental freedoms, on people’s health and safety and on the environment*”. Under this law, the developed [Vigilance plan](#) must include the following items:

- A risk map;
- An assessment of subsidiaries, suppliers and subcontractors;
- A whistleblowing system;
- Action plans;
- A monitoring and assessment system.

This commitment is demonstrated in Veolia Environnement SA’s [9 Sustainable Development Commitments](#), as well as in our fundamental values and principles as set forth in our [Ethics Guide](#). Such values include solidarity, respect, innovation, customer focus and responsibility.

The Sustainable Development Commitments guide our relations with internal and external stakeholders. Veolia Environnement SA is committed to respecting employees’ human rights, but also those of the individuals and communities where Veolia operates and sources from.

Veolia Environnement SA has been a member of the United Nations Global Compact since 2003. This membership commits the Group, globally, to promoting 10 fundamental principles of human rights, labour rights, and protection of the environment. Since 2014, Veolia Environnement SA has had its place at the “*advanced*” level of the United Nations Global Compact differentiation program which uses 21 specific criteria to set the highest standard of voluntary performance reporting on responsible development.

To clearly identify our contribution to the Sustainable Development Goals (“SDGs”), Veolia is a major player in sustainable cities (SDG 11) through its management of essential services like water, sanitation (SDG 6), energy (SDG 7) and waste (SDG 11). And with its growth activities, Veolia encourages innovative industrial production methods (SDG 9) and more responsible consumption through the circular economy (SDG 12).

Our capacity for innovation (SDG 9) and our partnerships with industry (SDG 17) were identified as key to helping to achieve the SDGs, particularly in terms of combating climate change (SDG 13).

Veolia Environnement SA globally implemented a Human Rights framework, applied across the Group, as well as in Australia and New Zealand. This framework defines in particular:

- A governance and steering device
- A Human Rights Policy
- An Annual Risk Analysis
- Performance Assessment tools
- Dialogue with local and international stakeholders
- Transparency of non-confidential data and actions.

In June 2019, Veolia Environnement SA organised, with the World Business Council for Sustainable Development (“WBCSD”) and the “*Entreprises pour les droits de l’homme*” (EDH) association, a morning of discussions on “*Human rights and sustainable development objectives: involvement of CEOs, responsibility of companies and opportunities*”.

As Veolia is resolutely committed to these issues, the Chairman and Chief Executive Officer at the time, Antoine Frérot, co-signatory of the WBCSD’s “*CEO Guide to Human Rights*”, took advantage of this meeting to invite his peers to take action on these issues.

LOCAL APPROACH

Globally Veolia, including in Australia & New Zealand, has a zero tolerance approach to modern slavery and the conditions that enable it. To combat modern slavery, in addition to adopting the Group “*Vigilance Plan approach*”, Veolia in ANZ has developed a multi-year **anti-slavery strategy** which supports our commitment. Our approach to modern slavery is centred around four pillars underpinned by continuous improvement.

- **Internal Awareness:** Embed modern slavery awareness and due diligence within business as usual activities and employees’ knowledge;
- **Supply chain awareness and due diligence:** Increase supply chain vigilance;
- **Victim Support:** Ensure a victim centred approach with an established support mechanism; and
- **Collaboration:** Improve engagement with stakeholders and build partnerships with peak bodies, NGOs and industry.

This approach gives Veolia a clear yet flexible approach to tackle modern slavery issues with specific actions underpinned by a robust governance and reporting framework.

MODERN SLAVERY GOVERNANCE

A robust governance process is established to ensure the anti-slavery strategy is executed with clear measurable objectives and that progress is monitored on a regular basis. The following groups and committees are established to deliver the objectives.

CEO & Veolia Executive Committee

The CEO and MD along with the Veolia Executive Committee have overall accountability for ensuring the anti-slavery strategy is appropriately executed.

Modern Slavery Working Group

The interdisciplinary Modern Slavery Working Group is responsible for:

- Assessing the modern slavery risks within Veolia’s operations and supply chains;
- Developing the anti-slavery strategy;
- Delivering the anti-slavery strategy, particularly through the implementation of actions aiming at mitigating identified risks; and
- Remediating any Modern Slavery instances identified.

The interdisciplinary Modern Slavery Working Group’s core members are senior members from the following teams: Ethics, Compliance, Risk, Sustainability, Legal, Procurement and Human Resources. The Modern Slavery Working Group meets on a monthly basis and as required.

Modern Slavery Champions Network

The Modern Slavery Champions network complements the Corporate organisation. It is composed of senior members from each Veolia’s Lines of Business.

The network of Modern Slavery Champions operates with the ambition to:

- Act as a “*Line of Business*” point of contact for any modern slavery issue.
- Identify “*Line of Business*” specific actions.
- Act as a “*Line of Business*” Lead for implementation of actions.



KEY SPECIFIC RISK MITIGATIONS IN PLACE IN 2023

Industrial Clothing

To mitigate modern slavery risks and rationalise our pool of providers following the SUEZ integration, we have selected one main supplier for Industrial Clothing. In an exemplary model of inclusive sourcing, we aim to purchase our workwear and PPE from a unique Aboriginal owned brand manufactured and distributed via a leading distribution and services group.

This supply arrangement was chosen for the assurances of quality, sustainability and responsible supply chain management given by the manufacturer/distributor. These were tested via a modern slavery review in late 2023. This arrangement is also delivering increased social and territorial value by helping an Aboriginal business to scale up.

In 2023, we sourced over two thirds of our industrial clothing supply via this collaborative partnership. Regular engagements with the manufacturer/distributor include consultations on the evolution of their modern slavery program which is already a benchmark in this category.

Other minor Industrial Clothing suppliers accounted for less than 30% of Veolia's spend and it is our intention to further reduce Veolia's exposure to these suppliers in 2024.

Labour Hire

In 2023, Veolia finalised the selection of a panel of preferred suppliers to handle contingent labour needs across the organisation nationally.

These suppliers were chosen following a rigorous evaluation which included, among other criteria, the evaluation of:

- Their compliance with Veolia's corporate and social responsibility requirements, and
- Their commitment to transparency and diligence in their efforts to mitigate modern slavery risks.

Selected suppliers have accepted reinforced modern slavery conditions in their supply agreements. Implementation of the new supply arrangements commenced in 2023 and will continue into 2024.

With only one fifth of suppliers making the grade, this work has considerably reduced our modern slavery exposure in this category.

Direct Use of Labour

Veolia employs 6,500+ individuals on direct contracts of employment. Veolia complies with the legislative requirements of the Fair Work Act 2009 and the Fair Work Regulations 2009.

Wages are paid electronically directly to the employee's bank account. In Australia for example, in line with Department of Home Affairs guidance, Veolia will not employ anyone without the correct proof of Right to Work.

Veolia works in partnership with a number of trade unions to ensure agreed and reasonable pay for our staff.

Veolia Is Also Strongly Committed To:

- **Eliminate discrimination.** Employee diversity is an asset which allows the company to innovate and perform better. Veolia strives to be a socially responsible employer everywhere it operates, to guarantee respect for every individual, to encourage a greater diversity of profiles and to develop inclusion within teams;
- **Guarantee equal opportunities**, recognising the talents of every individual and avoiding all discrimination on the grounds of origin, gender, disability, age, etc; through fair and non-discriminatory Human Resources processes ensuring the development of diversity and gender equality;
- **Guarantee the development of social dialogue and freedom of expression of employees;**
- **Guarantee the right to work in a healthy safe environment.**

These commitments, along with the mechanisms and processes in place to achieve these, are developed in detail in Veolia's policy framework.

Veolia's Whistleblowing Policy covers, among other elements, any unlawful activity relating to modern slavery.

GENERAL RISK MITIGATIONS ALIGNED TO OUR ANTI-SLAVERY STRATEGY

Internal Awareness

Embed modern slavery awareness and due diligence within business as usual activities and employees' knowledge

Why?	How?
<p>Modern Slavery involves the abuse and coercion of vulnerable people. In line with UN Guiding Principles of Business, Human Rights and UN Sustainable Development Goal 8.7, it is essential that businesses foster an environment that recognises that it is everyone's role to create conditions that tackle modern slavery and supports victims and those at risk.</p>	<ol style="list-style-type: none"> 1. Developed a third party compliance due diligence Procedure 2. Communicated broadly on the Veolia Modern Slavery Framework and Modern Slavery Statement 3. Rolled out a "Spot the Signs" Communication Campaign 4. Refreshed Veolia Modern Slavery Intranet page 5. Reviewed existing information, policies, and procedures to assess risk and developed new policies, procedures and plans 6. Promoted Veolia whistleblowing program to all employees 7. Trained members of the supply chain function 8. Trained 4,200+ employees on Modern Slavery 9. Trained 940+ managers on Modern Slavery response 10. Conducted a detailed 1.5 hour Face to Face training with employees 11. Maintained a Modern Slavery Champion Network 12. Complied with applicable laws for our direct use of labour 13. Set up a Diversity & Inclusion Council to address cultural & social diversity, gender equity and others 14. Implemented an anonymous monthly "check up" for employee to provide suggestions / comments (including Modern Slavery)

Supply Chain Awareness and Due Diligence

Increase supply chain vigilance

Why?	How?
<p>Under the Guiding Principles on Business and Human Rights, Veolia has a responsibility to respect human rights which includes taking actions to prevent, mitigate and, where appropriate, to remediate modern slavery through working with suppliers and reviewing our own operations.</p>	<ol style="list-style-type: none"> 15. Mapped key parts of operations and Tier 1 supply chain 16. Risk mapped high spend suppliers 17. Surveyed a panel of exposed employees to update the Modern Slavery risk profile 18. Developed purchasing guidelines for buyers for all categories where there is a local or global supply arrangement in place 19. Set objective criteria for selecting our suppliers and service providers ensuring adherence to ethical and sustainable development rules adopted by Veolia globally 20. Loaded Modern Slavery Clause on Veolia's website 21. Reinforced collaboration with suppliers particularly on Modern Slavery 22. Performed Compliance Due Diligence on recyclable Traders 23. Reviewed our main Industrial Clothing Distributor's Anti Modern Slavery Practices 24. Performed a full corruption risk mapping which included Modern Slavery elements.

Victim Support

Ensure a victim centred approach with an established support mechanism

Why?	How?
<p>Modern Slavery is a hidden and generally under reported crime, with only 1 in 5 victims in Australia being identified. The majority of victims are highly vulnerable and without power. Globally 1 in 4 victims are children and 71% are women and girls. Victims will often experience powerlessness and trauma, and consequently need ongoing support.</p>	<ul style="list-style-type: none"> 25. Developed a Remediation Procedure to investigate and remediate all situations where modern slavery is suspected 26. Developed Guidelines for Working with Trafficked People and Modern Slavery Victims 27. Maintained a system to support all Veolia employees who may experience primary or secondary trauma through the Employee Assistance Program 28. Rolled out a “Spot the Signs” Communication Campaign

Collaboration

Improve engagement with stakeholders and build partnerships with peak bodies, NGOs and industry

Why?	How?
<p>Collaboration is key to combating modern slavery. Due to the interconnected nature of our world, civil society, consumers, governments, businesses and investors must all work together to tackle slavery. Increasing engagement and collaboration promotes learning, openness and sharing of challenges and lessons.</p>	<ul style="list-style-type: none"> 29. Ensured open forums with workforce representatives such as labour hire providers and unions 30. Engaged with international stakeholders including Veolia Environnement SA to share learnings and in particular other countries where modern slavery legislation applies such as UK’s modern slavery Act and France’s Corporate Duty of Vigilance Law, as well as raised awareness within Veolia Environnement SA’s supply chain and operations 31. Adhered to and promoted Veolia Environnement’s Human Rights Policy and other group norms



CASE STUDIES - 2023

Promoted our whistleblowing program to all employees.

- Veolia's whistleblowing system, available to both Veolia employees and [third parties](#), has been developed to ensure situations relating to modern slavery, among other critical subjects, are reported for investigation and resolution to an independent body: the Group Ethics Committee. Through this global system, authors of reports are able to remain anonymous if they wish.
- Third parties can alert the Group Ethics Committee through Veolia's whistleblowing system [here](#).

Performed modern slavery due diligences among compliance due diligences on more than 2600 third parties.

- A Third Party Compliance Due Diligence Procedure is in place. It is designed to drive transparency and integrity, promoting and enforcing ethical business practices across critical elements of Veolia's compliance framework including but not limited to: Human Rights / International Sanctions, Enforcements and Watchlists / Politically Exposed Persons / Corruption / Terrorism & Trafficking / Conflict Minerals / Environmental.
- In accordance with the procedure, Compliance due diligences are embedded in the assessment of a large number of sensitive third parties in accordance with the risk mapping. These due diligences are performed internally based on information sourced by a specialised international market leader.
- 1900+ individual Due Diligences were performed on suppliers.

Continued to roll out and develop trainings to improve awareness of our employees.

- Two trainings have been rolled out across the organisation:
 - A compulsory 25 minutes training, dedicated to all permanent employees, increases Modern Slavery awareness, particularly in regards to the types and signs of Modern Slavery, highlighting what can be done to help combat it at every level of the organisation, but also in everyone's personal life. It has been taken by 83% of the enrolled workforce in 2023 (4,200+ employees compared to 3,150+ employees in 2022).
 - A compulsory 15 minutes training, dedicated to all managers, equips them to understand Modern Slavery, addresses concerns and guides the response. It clearly emphasizes the critical role managers have to play in the elimination of Modern Slavery in Veolia's operations and supply chain. The Manager module, compulsory for all managers, has been taken by more than 89% of Veolia ANZ Managers in 2023 (940+ Managers compared to 800+ in 2022).
- A detailed interactive 90 minutes face to face Modern Slavery training was rolled out in 2023.
 - It was attended online by 150+ employees. It is available on Veolia ANZ training platform and can be accessed by all employees at any time.
 - The main objectives were to:
 - Clarify the Modern Slavery Context;
 - Explain the Risks & Reporting Requirements;
 - Describe how Veolia deals with Modern Slavery; and
 - Empower and Encourage Employees to also Take Personal Actions.

CASE STUDIES - 2023 - CONTINUED

Communicated regularly to all employees to continue to raise awareness and improve the reach.

- Throughout the year, a number of communications have been delivered to all employees including posters on sites and electronic communication ("*Spot the Signs*" campaign / messages in monthly newsletters / Modern Slavery Statement update / Anti Slavery Day...).
- A Modern Slavery "*Spot the Signs*" campaign has also been launched on site and electronically to help employees identify potential signs of Modern Slavery in our Operation and Supply Chain.
- The network of Modern Slavery Champions was active across the organisation to improve the reach of the framework and provide another opportunity for employees to speak up through a more "*local*" network.
- An interactive 90 minutes Modern Slavery webinar was rolled in 2023. The live event was advertised through all Veolia ANZ platforms to all employees. The recorded event is now available on Veolia ANZ platforms and can be accessed by all employees at any time.

Collaborated with suppliers on Modern Slavery during onboarding.

- In 2023, Veolia initiated the implementation of a new supplier management system. All new suppliers to Veolia must register and onboard with us via this tool. The onboarding process entails the completion of a questionnaire evaluating the supplier's credentials, compliance and commitment to responsible sourcing. Embedded in the questionnaire is a section dedicated to modern slavery practice. Completion of this questionnaire is mandatory for all new vendors.
- Additionally, all existing suppliers must transition over to this new tool. Given the depth of our supply chain, this work is taking some time. Whilst over one third of our existing suppliers have already completed modern slavery evaluations for us within the last three years, we will require existing suppliers to complete the onboarding questionnaire as they are set up in the new system.
- Additional modern slavery assessments are built into our tendering process. These ensure that all strategic and high volume suppliers are evaluated for their modern slavery and other environmental and social governance (ESG) efforts. In addition, all contracted suppliers must accept robust modern slavery clauses in their supply agreements with Veolia.

Reviewed our main Industrial Clothing Distributor's Anti Modern Slavery Practices.

- Veolia's lead industrial clothing distributor represents over 70% of our spend in this category. In 2023, Veolia invited this provider to present their modern slavery program to our senior category and compliance managers. Insights and audit examples were shared by senior representatives from both their Australian and Asian sourcing operations.
- Our provider demonstrated an extremely robust modern slavery program encompassing clear directives and guidelines and comprehensive supplier audits. These audits have become a benchmark for responsible sourcing and performance on the Asian continent.
- Our engagement with our lead provider will continue in 2024. A site visit to a major distribution hub onshore is scheduled early in the new year. This visit will entail a tour of the facility by our senior procurement leaders and a deep dive into the audit methodology deployed by their sourcing team in Asia.

ASSESSMENT OF EFFECTIVENESS

In FY23, the framework deployed by Veolia has continued to mature in line with the 2018 Modern Slavery Act requirement, taking full advantage of the progress made previously, particularly in regards to our Supply Chain monitoring.

FY23 was also marked by the completion of the integration of Suez activities and the alignment of our Modern Slavery practices. Since the middle of 2023, the whole organisation now shares a consistent Modern Slavery framework.

In order to measure the effectiveness of our overall anti-slavery strategy and activities related to tackling modern slavery, we are regularly tracking a number of Key Performance Indicators (KPIs) aligned to the four pillars of our anti-slavery strategy.

For FY23, these KPIs continue to reflect a continuous strengthening and an overall improvement of our modern slavery response throughout the year. In FY23, no modern slavery incident was identified in our operations or supply chain.

As we continue on our journey to eradicate modern slavery, we are permanently building on learnings and improving our overall framework. As such, these KPIs are updated, as necessary, to ensure we permanently measure and assess the effectiveness of our all actions.

For example, here is a list of KPIs that were monitored in 2023:

- **Internal Awareness**
 - Core Training Attendance
 - Manager Training Attendance
 - Engagement of Anti-Slavery awareness campaign
 - Number of Modern Slavery incidents
- **Supply Chain Awareness And Due Diligence**
 - Number of Third Party Due Diligences
 - Number of Audits completed
 - Continuous measurement of incidents recorded and lessons learned
- **Victim Support**
 - Victim centred approach established through annual sentiment survey
 - A victim-centred review mechanism to understand the lessons learned
- **Collaboration**
 - Number of interactions with the Group

KPIs relating to the implementation of Veolia Modern Slavery Framework across Suez activities were also closely monitored.



CONTINUOUS IMPROVEMENT

Veolia is convinced a continuous improvement approach to tackle modern slavery is necessary. In FY24, we will continue to monitor FY23 KPIs and update our KPIs to ensure we continue to appropriately measure and assess the effectiveness of all our actions, old and new.

In FY24, Veolia will focus on:

- Monitoring the results and recommendations of the statutory review of the Modern Slavery Act 2018.
- Implementing / further strengthening the below actions aligned to our anti-slavery strategy.

INTERNAL AWARENESS

Embed modern slavery awareness and due diligence within business as usual activities and employees' knowledge

How?

- Deliver internal modern slavery training to all Veolia employees.
- Deliver enhanced modern slavery training to all managers and roles in key risk areas.
- Raise awareness across the organisation.
- Conduct a Compliance Roadshow to enable face-to-face discussions with employees regarding various Compliance topics, including Modern Slavery.

SUPPLY CHAIN AWARENESS AND DUE DILIGENCE

Increase supply chain vigilance

How?

- Update supply chain risk mapping as required.
- Further Review our Industrial Clothing Provider Anti Modern Slavery Practices.
- Further strengthen our contractual framework with recyclable traders.

VICTIM SUPPORT

Ensure a victim centred approach with an established support mechanism

How?

- Provide effective support to victims throughout their recovery working with dedicated organisations.

COLLABORATION

Improve engagement with stakeholders and build partnerships with peak bodies, NGOs and industry

How?

- Engage with organisations to ensure Veolia goes beyond compliance and improve understanding of modern slavery risks.

Resourcing the world

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