

# Modern Slavery Statement 2024-25



**sunwater**

# Acknowledgement of Country

## Our First Nations Commitment Statement

*Sunwater acknowledges Aboriginal and Torres Strait Islander peoples as the first peoples of this country and Traditional Owners and Custodians of the land and water we rely on. We respect and value their continued sacred connection to Country, including the diverse rich traditions, languages and customs that are the longest living in the world. We acknowledge their resilience in the face of significant and ongoing historical, cultural and political change within Australia. We recognise and value the importance of truth-telling today, and our role to listen and learn. Our vision for reconciliation is that we are a nation of unity and fairness for all; a nation that owns its history and acknowledges its First Nations peoples, their strength and their living culture.*

*Our goal is to work together to realise mutual benefits with First Nations peoples through authentic relationships and respect for cultural value; fostering a sense of belonging and pride in our people, community, customers and stakeholders. We can learn so much from Traditional Custodians, who have cared for Country for thousands of years, in the way we sustainably manage water and land. Going beyond compliance and embedding reconciliation into core business practices and decision making brings to life our purpose of Delivering Water for Prosperity through Valuing People, Working Together and Taking Responsibility.*

## About this statement

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and sets out the actions taken by Sunwater Limited (ACN 131 034 985) to address modern slavery risks in its business and supply chains for the reporting period.

Modern slavery is defined under the Act as including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. While Sunwater does not tolerate these practices, it recognises that risks may exist in some areas of its supply chain, and it is committed to identifying and addressing these risks.

## Table of contents

About this statement .....	2
Table of contents .....	3
Message from our Chair.....	4
About Sunwater.....	5
Risk assessment.....	8
Risk mitigation and remediation.....	9
Assessment of effectiveness.....	11
Consultation .....	11
Board approval.....	12

## Message from our Chair

On behalf of Sunwater, I am pleased to present our Modern Slavery Statement for the financial year 1 July 2024 to 30 June 2025, which demonstrates our unwavering commitment to protecting human rights throughout our operations and supply chains. Modern slavery is one of the most significant human rights challenges of our time, affecting millions of people worldwide and thousands across Australia. At Sunwater, we take seriously our responsibility to prevent, identify, and address modern slavery risks across our operations and supply chains. Our approach is embedded within our broader sustainability goals and reflects our commitment to delivering positive outcomes. This statement outlines our progress, the challenges we continue to face, and our commitments to reducing the risk of modern slavery.

This statement reflects our ongoing commitment to transparency, continuous improvement, and sector leadership. While our risk profile remains relatively low, we recognise the importance of vigilance and collaboration in addressing this complex issue. We are committed to working with our employees, suppliers, and industry partners to drive meaningful changes and ensure ethical practices throughout our operations and supply chains.

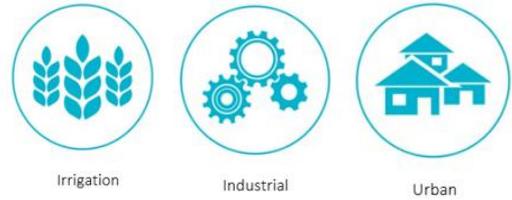
**Jeff Seeney**

Chair

Sunwater Limited

## About Sunwater

Sunwater Limited is a Queensland government-owned corporation, which provides around 40 per cent of all water used commercially in Queensland. Sunwater supports regional growth and prosperity through the provision of water solutions and bulk water for agricultural, urban and industrial customers.



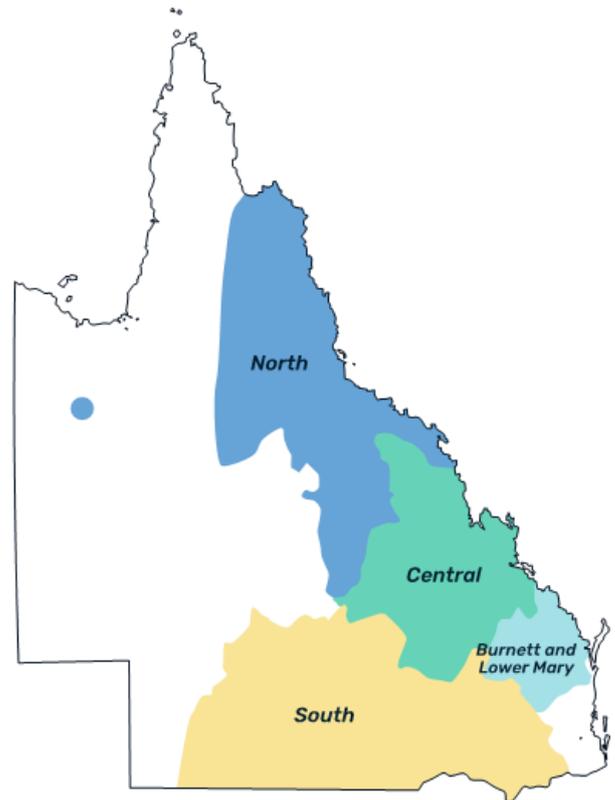
On 1 October 2000, Sunwater was established under the *Government Owned Corporations Act 1993* (Qld). It has two shareholding Ministers and is governed by an independent board.

Sunwater wholly owns three subsidiaries:

- Burnett Water Pty Ltd
- Eungella Water Pipeline Pty Ltd
- North West Queensland Water Pipeline Pty Ltd.

These subsidiaries operate as part of the Sunwater business and do not have separate employees or supply chains.

As of 30 June 2025, Sunwater had a total full-time equivalent workforce of 785, which included seven apprentices and 47 contractors. Approximately one third of Sunwater's people work from its 34 offices and depots across regional Queensland. The remainder are based in Brisbane and the Rocklea Hydraulics Laboratory. When tendering for subcontractors and suppliers in the regions, Sunwater uses local labour and suppliers where possible.



## Our values

Our values underpin everything we do and how we do it. We:

- **value people** – Everyone matters, and we are committed to zero harm
- **work together** – We are at our best when we work together as one with our customers front of mind
- **take responsibility** – We all have a part to play to deliver on our promises and challenge our thinking



## Our operations and capabilities

Sunwater’s 19 dams and 1951 kilometres of pipeline store, capture and deliver around 40 per cent of the water used commercially in Queensland to more than 4600 customers.

As one of the country’s most progressive, successful water companies, Sunwater offers end-to-end services for customers seeking bulk water infrastructure for industrial, mining, irrigation or urban use. Our capabilities range from assessing the feasibility of water delivery projects, to providing concept, detailed design and production and delivery services.

## Our water infrastructure assets

Sunwater has an extensive network of bulk water infrastructure, which includes:

- 19 dams
- 65 weirs and barrages
- 595 kilometres of water channels
- 70 pump stations
- 1951 kilometres of pipeline
- five water treatment plants

Most of Sunwater’s assets and operations are located within Queensland, with a small operational footprint in northern New South Wales.

Sunwater’s operations can be categorised as:

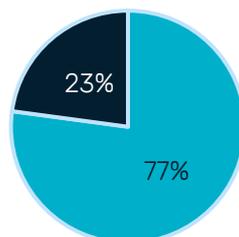
- bulk water infrastructure design, development, and delivery
- water infrastructure operations and maintenance (including management of water supply schemes, pump stations and pipelines)
- customer service and stakeholder management of irrigation, industrial and urban customers, communities, and recreational users
- supporting corporate and business services
- water trading services.

In 2024-25, Sunwater continued investing in its Dam Improvement Program, as part of its wider Dam Safety Management Program. This was to ensure regional bulk water assets are maintained in accordance with current standards. These projects have been, and will continue to be, delivered with external partners and stakeholders, including major construction firms.

## Our supply chain

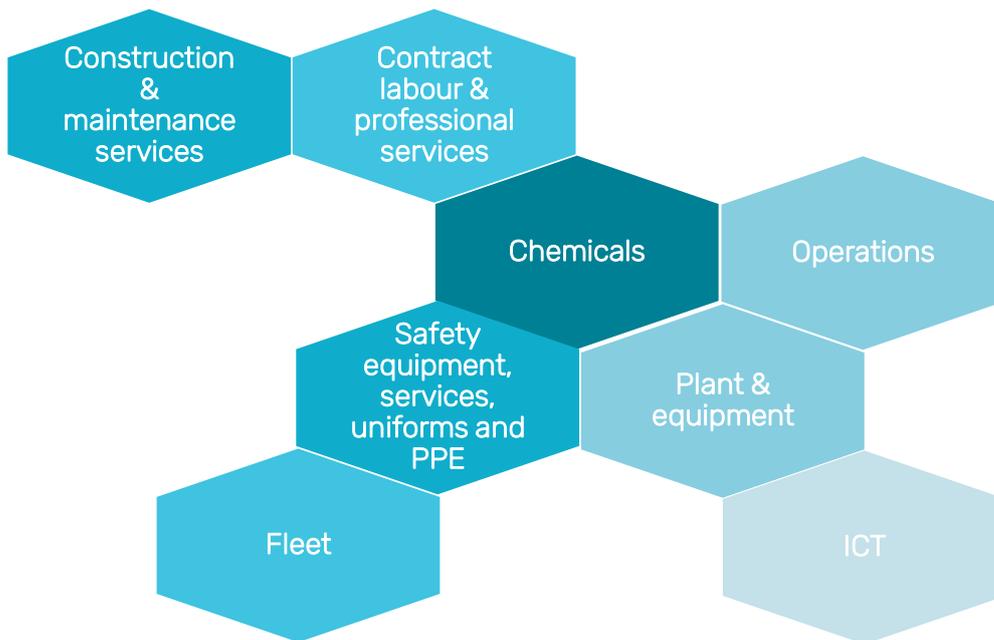
During 2024-25, Sunwater committed \$176 million to 1329 suppliers with 77 per cent of active suppliers located in Queensland.

### Supplier location distribution



■ Active Supplier % - QLD-Based ■ Active Supplier % - Other Region

As an infrastructure developer and water utility, Sunwater sources goods and services across a wide range of supply chain categories. These include:



Sunwater’s procurement function supports the infrastructure development and delivery program including, the Paradise and Tinaroo Falls Dam Improvement Projects and the Barlil and Cooranga Weir Development Projects. This commitment to infrastructure development and delivery is expected to drive increased expenditure in several categories, including construction materials, infrastructure delivery services and contract labour.

## Risk assessment

### Operations

As Sunwater's core business is the provision of water solutions and bulk water supply for irrigation, industrial and urban customers, there is a risk of modern slavery at an enterprise level. Specifically, there is a possibility of engaging contractors and/or suppliers that have links to modern slavery, caused by a lack of awareness or understanding, resulting in a breach of the Act.

This could occur when:

- engaging agencies that provide services such as:
  - hospitality
  - cleaning
  - construction labour
- procuring goods from emerging economies, such as:
  - uniforms
  - office supplies
  - construction supplies
  - information and communications technology (ICT)
- engaging contractors who subcontract out to other companies/businesses, resulting in a lack of visibility of supply chains.

### Supply chain

Sunwater undertakes an annual strategic scan of the modern slavery risk exposure in its supply chain. This identifies areas of potential risk that would warrant further detailed investigation and, if required, targeted risk management measures are triggered. Sunwater uses the following methodology as part of its annual strategic scan:

- exposure to higher risk industries
- geographic exposure to higher risk regions through its supply chain
- scale of exposure to individual suppliers based on expenditure during the reporting period.

In 2024-25, Sunwater identified labour hire, ICT and heavy civil construction as its risk industries. Sunwater did not identify any direct expenditure in higher risk regions. However, some suppliers source from regions known to have a higher risk of modern slavery. Sunwater recognises that there are risks of modern slavery within its operations and supply chains. Potential risks arise when engaging contractors or suppliers that may have links to modern slavery, particularly in sectors such as labour hire, ICT, heavy civil construction, hospitality, cleaning and uniforms. These risks may also occur where contractors subcontract work to others, reducing visibility.

## Risk mitigation and remediation

No modern slavery matters or risks that require remediation actions have been identified.

Sunwater is committed to working with stakeholders and business partners to ensure it has a positive impact on eliminating modern slavery practices in all forms within domestic and global communities. As such, Sunwater takes a holistic approach to addressing modern slavery risks which are outlined in this section.

## Governance

Sunwater's corporate governance framework is underpinned by its values, principles of ethical conduct and behavioural expectations which ensure accountability and transparency across the business. These values and expectations are supported by Sunwater's enterprise risk management framework.

Sunwater's risk management processes include monthly and quarterly reviews and reporting of its enterprise risk profile, focusing on:

- priority risks
- key risk indicators for each of Sunwater's material risks
- related industry information
- guidance from Sunwater's committees and senior management
- improvement activities.

Activities over the reporting period included continued focus on enhancing capability and the quality of:

- priority risks identification and assessment
- risk controls and treatments
- risk reviews.

Sunwater continues to promote awareness through its Modern Slavery Policy and compulsory eLearning modules for all employees.

## Procurement and supply chain

During the reporting period, Sunwater:

- continued to implement contract terms and conditions and contracting templates to reflect a commitment to monitoring and managing modern slavery risk in its supply chain.
- implemented an enterprise procurement and contract management system that enables better management of procurement activities and contract management.
- assessed local supply chain exposure, with particular attention to higher-risk sectors such as labour hire, ICT, heavy civil and construction, and contract labour.
- conducted due diligence by assessing suppliers' responses to the Modern Slavery Response Schedule as part of the evaluation process for offers and quotations.
- partnered with other water industry entities to carry out a Modern Slavery survey via Informed 365, a platform for assessing and managing the risk of modern slavery in supply chains. The Modern Slavery survey results showed that no suppliers were assessed as high or very high risk.

## Operations

Sunwater is committed to ensuring the health, safety and wellbeing of its workforce. A suite of policies informed by, and compliant with, Australian workplace and occupational health and safety law are maintained and updated through a controlled governance review cycle.

During the reporting period, Sunwater:

- assessed modern slavery risks through its procurement processes, particularly for activities valued above \$250,000.

- updated the Source to Contract guideline and contract management procedure to improve Sunwater’s assessment of modern slavery risks.
- conducted ethical supplier checks through the Queensland Government Ethical Supplier Register for suppliers engaged to provide goods, services or work valued at or above \$20,000.

## **Training and awareness**

In 2024-25, building on the modern slavery risk management training that was initially delivered to procurement and internal working group team members, Sunwater:

- rolled-out modern slavery awareness training as mandatory for all employees
- continued to make self-serve awareness material available for:
  - workers providing guidance on Sunwater actions to reduce modern slavery risks
  - guidance for workers if they become aware someone is at risk of, or is affected by, modern slavery practices.

## **Sector collaboration**

Sunwater participated in an industry working group sponsored by the Water Services Association of Australia, which provided an opportunity for idea sharing, discussion around implementation activities and consideration of modern slavery technology solutions to assist with supplier engagement and reporting.

## Assessment of effectiveness

Sunwater recognises that measuring the effectiveness of its actions to identify and address modern slavery risks is an ongoing and evolving process. Its assessments have centred on governance frameworks, procurement practices, worker awareness, and monitoring progress against the commitments outlined in its 2024–25 statement.

During the reporting period, Sunwater enhanced the embedment of modern slavery risk management into business-as-usual processes and continued to strengthen enterprise systems that enhance its ability to assess and respond to risk. Effectiveness is reviewed annually through the integration of modern slavery controls into standard operating processes.

Sunwater partners with the Water Services Association of Australia through a community of practice, which provides a platform to share knowledge and learn from contemporary approaches to addressing modern slavery risks.

## Consultation

Sunwater consulted its three subsidiaries in the development of this statement. As subsidiaries operate as part of the broader Sunwater business, they do not maintain separate employees or supply chains.



## Board approval

This Modern Slavery Statement has been approved by the Board of Sunwater Limited (ACN 131 034 985) in accordance with section 13 of Modern Slavery Act 2018 (Cth) on 2/12/2025



**Jeff Seeney**

**Chair of the Board**

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