

A MESSAGE FROM OUR



I am pleased to present Urban Utilities' first Modern Slavery Statement which outlines the steps we have taken to identify, manage and mitigate modern slavery risks in our operations and supply chain.

As an essential service provider, Urban Utilities' decisions and actions have the potential to significantly impact our people, customers, communities and shareholders.

Cognisant of this, we are committed to delivering our products and services in a manner that reflects both our purpose, to Enrich quality of life, and our vision, We play a valued role in enhancing the liveability of our communities.

We understand the importance of responsible procurement and ensuring that ethical, environmental and social considerations form part of the procurement decision-making process.

To ensure we are well positioned to understand, assess and address our modern slavery risks, we sought expert external advice on modern slavery compliance, supply chain risk assessment and human rights issues to develop a set of recommendations to uplift our modern slavery related controls.

We have also introduced a **Supplier Code of Conduct**, a **Modern** Slavery Supplier Questionnaire and Modern Slavery Awareness **Training**, which you can read more about in this statement.

While this statement sets out our foundational work, to ensure we continue to improve and evolve our response, we have established a Modern Slavery Working Group, which is charged with implementing our Modern Slavery Action Plan. This plan sets out a roadmap of activities, priorities and accountabilities that we are committed to achieving, while remaining up to date with industry approaches through collaboration with suppliers, peers and advisors.

I am proud of the work Urban Utilities has done and will continue to do to assess and address the risk of modern slavery within our operations and supply chain.

Louise Dudley

Chief Executive Officer February 2021

This Modern Slavery Statement is approved by the Board of Urban Utilities.

2019/2020 SNAPSHOT

Built our understanding of modern slavery risks

- Established a cross-functional Modern Slavery Working Group.
- Developed a Modern Slavery Action Plan.

MODERN SLAVERY STATEMENT 2019/20

- Commissioned an external, independent assessment of modern slavery risks within our operations and supply chain, which included gap analysis and recommendations to uplift our current position.
- Developed Modern Slavery Awareness Training, which was completed by our procurement practitioners.

Improved our policies, procedures and standards

- Incorporated human rights and modern slavery considerations into our procurement policy, procedures and templates.
- Implemented procedures to identify and address human rights and modern slavery issues.
- Updated our policy development and review processes to ensure human rights and modern slavery are considered.
- Incorporated human rights into our complaint handling processes.

Supplier due diligence and engagement

- Communicated our newly introduced Supplier Code of Conduct to key strategic suppliers.
- Developed a Modern Slavery Supplier Questionnaire, which was completed by 50 suppliers who provide goods/services in identified high-risk categories.
- Developed a Modern Slavery Checklist for purchasing activities under \$250,000.
- Incorporated modern slavery clauses in key new contractual arrangements.

1. OUR STRUCTURE, OPERATIONS & SUPPLY CHAIN

1.1 About us

On 1 July 2010, the Central SEQ Distributor-Retailer Authority, trading as Urban Utilities (previously Queensland Urban Utilities), was established as a statutory body under the South-East Queensland Water (Distribution and Retail Restructuring) Act 2009 (Qld) and named a service provider under the Water Supply (Safety and Reliability) Act 2008 (Qld).

Our shareholders are the South-East Queensland councils of:

- Brisbane,
- Ipswich,
- Lockyer Valley,
- Scenic Rim, and
- Somerset.

We operate in a unique environment where we serve the same customers and communities as our shareholders. We are governed by an independent Board, and our head office is based in Brisbane, Queensland, Australia.

As a statutory authority servicing communities in South-East Queensland, and with a total revenue of \$1,437.4 million, we are a reporting entity for the purposes of the *Modern Slavery Act 2018* (Cth).

1.2 Our operations

Urban Utilities is responsible for delivering drinking water, recycled water and sewerage services to 610,600 residential properties and 30,500 commercial properties in South-East Queensland, Australia. We deliver these services via our \$6.1 billion infrastructure network.

To enable our core services, we undertake several related functions, including:

- Future services planning Through our key strategic infrastructure planning document, the Water Netserv Plan, we inform the community on what we will do to provide for population growth by communicating current and future connection areas to support regional and local planning and guide the delivery of infrastructure to facilitate growth and development in our regions.
- Asset planning and management We are continually looking at ways to optimise asset planning and management to achieve the right balance between cost, risk and performance. This reporting period, we invested \$286.3 million in new and upgraded infrastructure to improve the reliability and sustainability of our water and sewerage networks. We also continued our digital transformation, including the implementation of our Enterprise Asset Management Solution, which will provide an uplift in the management and support of our assets, supply chain, mobile workforce and financial transactions.
- Water meter management and billing Water meters are integral to our provision of water services, as the primary mechanism through which water consumption is measured for billing purposes. Water meters are also an important way through which our customers can manage their water usage, particularly in times of drought. As such, water meter reliability and accuracy is paramount and is prioritised through our water meter replacement program.

■ **Development assessment and approvals** – The connection, disconnection or alteration of drinking water and wastewater services at a site is critical to property development. They must be done in accordance with the relevant Urban Utilities approvals to ensure we can appropriately manage any change in demand on our network infrastructure and to ensure protection of the integrity of our network infrastructure.

Waste management (including trade waste)

- Waste must be managed appropriately to ensure the integrity of our infrastructure and the treatment processes, the safety of our people, the protection of the environment, and the integrity of downstream water recycling and biosolid reuse. While we successfully deliver our water and sewerage services against a strict compliance framework, we are exploring alternative servicing solutions that reduce our impact on waterways and the broader landscape and will help us improve the health of our waterways and bays.
- Research and development Urban Utilities is committed to innovating for a better future. This commitment is supported by our state-of-the-art Innovation Precinct, which houses \$20.2 million worth of research projects that involve 24 partner organisations and universities.

Urban Utilities also operates the Scientific Analysis Services (SAS) Laboratory, which is responsible for providing water sampling services and chemical and microbiological analysis to a range of private and public sector entities.

Our 14,384km² geographic area is made up of five local government areas of our shareholders: Brisbane City, Ipswich City, Lockyer Valley Regional, Scenic Rim Regional and Somerset Regional Councils.

Our vast water and sewerage infrastructure network includes:

- 9,750 km of sewage mains;
- 9,559 km of water mains;
- 336 sewerage pump stations;
- 29 sewerage treatment plants;
- 107 water reservoirs;
- 87 water boosters; and
- 63 water pump stations.

For full details, please refer to Urban Utilities' Annual Report FY19/20.

1.3 Our workforce

In FY19/20, our total workforce of 1,370 employees comprised a range of professional and trade roles in permanent, temporary and casual capacities engaged under various industrial agreements. Direct employees accounted for 82% of our workforce, while 18% were agency resources who were employed on a short-term basis through formal, documented arrangements with contingent labour providers, and consultants engaged via formal contractual agreements.

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I. OUR STRUCTURE, OPERATIONS & SUPPLY CHAIN (CONT)

1.4 Our supply chain

During the FY19/20, Urban Utilities maintained a supply base of 930 suppliers, with the majority of our annual \$550 million supplier spend occurring with our tier one suppliers, primarily located in Australia.

Urban Utilities' supply chain includes 16 overseas suppliers, the majority of which are in the United States, with the other suppliers located in Canada, the United Kingdom, Ireland, Norway, the Netherlands and Israel. These suppliers primarily provide IT software and technology solutions to Urban Utilities.

As one of the largest water distributor-retailers in Australia, supplying drinking water, recycled water and sewerage services to a population of more than 1.5million in South-East Queensland, our major categories of procurement to support our capital and operational core functions include:



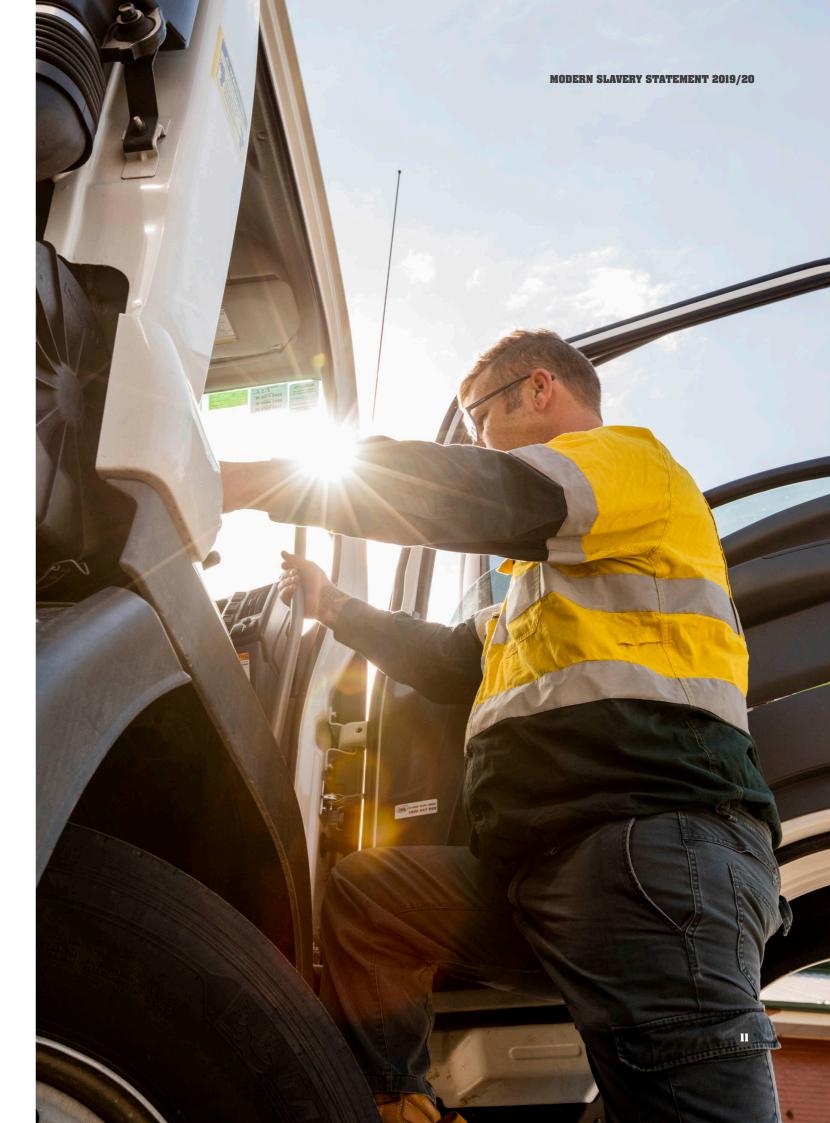








While the diversity of the goods and services we procure can potentially expose Urban Utilities to multiple risks, we apply a systematic approach to managing risk throughout our procurement decision making processes, which we consider an essential element of identifying and addressing modern slavery practices.



2. RISKS OF MODERN SLAVERY IN OUR OPERATIONS & SUPPLY CHAINS

2.1 Our approach

Urban Utilities is committed to delivering our products and services to the community in a manner that is consistent with our corporate values and aligned to people's human rights.

To ensure we minimise the risk of modern slavery and the potential exposure to human rights risk more broadly, Urban Utilities engaged an external advisor to undertake an independent assessment of modern slavery risks within our operations and supply chain, develop a Modern Slavery Risk Assessment Tool, and provide a road map for the uplift of controls within our organisation.

The Modern Slavery Risk Assessment Tool was designed to provide Urban Utilities with an ongoing framework from which to assess the risk of modern slavery in our operations and supply chains. In identifying the risks of modern slavery practices, we considered the potential for us to cause, contribute to or be directly linked to modern slavery through our operations and supply chains. The Modern Slavery Risk Assessment Tool empowers us to expand our initial risk assessment in future years beyond tier one suppliers. It also encourages us to procure more consciously in the future, to further understand and eliminate the modern slavery risks in our complete supply chain, thus maturing our understanding of our supply base.

A high-level overview of the methodology applied to identify and manage modern slavery risks in our operations and supply chain is outlined below:

High-level methodology to identify and remediate risks of modern slavery

- 1 Mapping of Urban Utilities' employment practices and supply chain.
- 2 Assessment of inherent risks of modern slavery within our business and supply chain.
- 3 Modern slavery controls 'gap analysis' and residual risk assessment undertaken.
- 4 Roadmap to uplift controls documented and prioritised.
- 5 Commencement of mitigation activities and control implementation in order to reduce modern slavery risks.

2.2 Our operations

The breakdown of labour arrangements data for Urban Utilities identified:

- a) During the reporting period, a total of 1,370 people were engaged by Urban Utilities in some capacity.
- b) The majority of these arrangements (approximately 82%) are directly engaged by Urban Utilities in the form of permanent (full time and part time) employees, temporary (full time and part time) employees and casual employees.
- c) Approximately 18% of our workforce is contingent labour engaged through recruitment agencies.
- d) With regards to our contingent labour engagements, most of these contractors have been engaged to support information services or operations and service delivery functions. They are engaged through formal, documented arrangements with contingent labour providers.

Regarding engaging employees, Urban Utilities has a formal recruitment process in place whereby we conduct verification and due diligence processes to ensure that employees have a "Right to Work" in Australia. Further, employees are engaged under various industrial agreements, including Common Law Contracts.

As for the contingent labour component of our workforce, the majority of our contingent labour is facilitated through one provider who supplies a broad range of skilled workers via a network of recruitment agencies. Under this arrangement:

- a) Urban Utilities has direct oversight and visibility of the people engaged through these arrangements;
- b) Urban Utilities has transparency over the rates paid to our contingent workforce;
- c) recruitment agencies are required to comply with legislative requirements, including modern slavery laws; and
- d) Urban Utilities has visibility of a worker's "Rights to Work", including any work visas.

With regards to work visas, we have processes and systems in place to ensure that any Urban Utilities employee or contingent worker on a visa complies with the visa requirements. Audits of contingent workers are conducted periodically by our provider, in which recruitment agencies are required to provide evidence of compliance (i.e. copies of passports, visas and vevo checks).

Overall, the risk of modern slavery in Urban Utilities' operations has been independently assessed as being low.

2. RISKS OF MODERN SLAVERY IN OUR OPERATIONS & SUPPLY CHAINS (CONT)

2.3 Impacts of COVID-19 on our operations

During the COVID-19 pandemic, Urban Utilities has maintained its focus on delivering water and sewerage services to our commercial and residential customers. COVID-19 had no material impact on our worker composition or the risk of modern slavery practices in our operations.

2.4 Our supply chain

During FY19/20, a preliminary high-level review of our tier one suppliers was undertaken via our Modern Slavery Risk Assessment Tool to identify our high-risk suppliers.

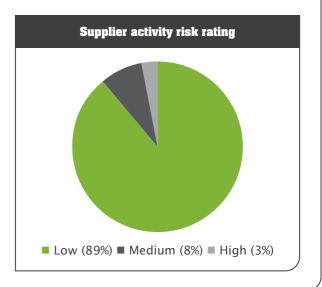
The initial review was completed by reference to activity risk and geographic risk.

I. Activity assessment

The activity rating was determined by reference to information about the prevalence of slavery within the industries, sectors, goods or services being supplied to Urban Utilities. Supplier data was reviewed to identify those suppliers that were a potentially higher risk based on the industry or sector in which they operate, or the goods/services being provided.

After analysis of the review findings, it was identified that Urban Utilities' higher-risk suppliers were in the following areas: electronics, clothing, concrete/asphalt, bricks, steel, traffic control, security services, and cleaning and facilities maintenance.

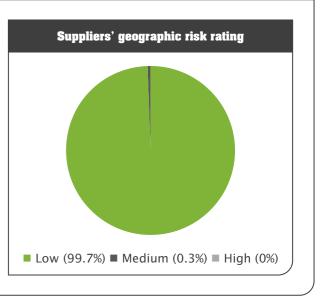
The graph provides a summary of the breakdown of Urban Utilities' supplier activity risk rating.



II. Geographic assessment

The geographic risk was determined by referencing data from the Global Slavery Index, which measures the prevalence of modern slavery in 186 jurisdictions. Based on the data available, a rating of either high, medium or low was assigned to all countries for the purpose of determining the level of risk within a jurisdiction.

The graph provides a summary of the breakdown of Urban Utilities' suppliers' geographic risk rating. As almost all Urban Utilities' direct suppliers are based in Australia, there is a high proportion of 'low' risk suppliers from a geographic risk perspective.



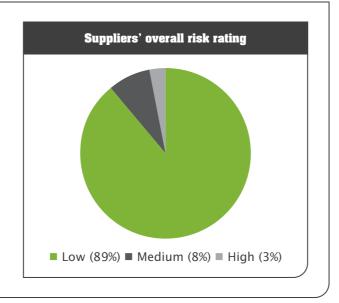
2. RISKS OF MODERN SLAVERY IN OUR OPERATIONS & SUPPLY CHAINS (CONT)

III. Inherent overall risk rating

The overall rating for a supplier was determined based on the highest risk score the entity received for the activity and geographic assessments.

The graph provides a summary of the breakdown of Urban Utilities' suppliers' overall risk rating.

These results indicate that the inherent overall modern slavery risk within the Urban Utilities supply chain is low-medium.



IV. Controls score

To determine what controls the identified high-risk suppliers have in place to identify and mitigate modern slavery risks, suppliers were asked to complete Urban Utilities' Modern Slavery Supplier Questionnaire. This questionnaire was also forwarded to a number of our key strategic suppliers (regardless of risk level) to further increase our understanding of our supply base.

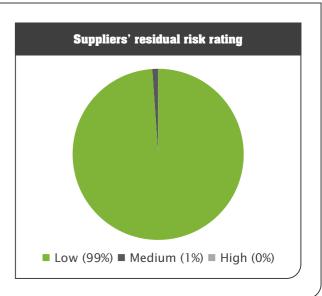
As at 30 June 2020, 50 suppliers had completed this questionnaire. The supplier responses were analysed and a controls score was applied based on the sufficiency of the supplier's modern slavery controls. Urban Utilities will work with the suppliers that it considers has insufficient controls through its contract management and supplier relationship management frameworks, to better understand the risk level and, where necessary, develop a plan for remediation.

V. Residual risk score

The graph provides a summary of the residual risk score, which takes into consideration the outcomes of the inherent risk score and controls score.

The residual risk rating indicates that the overall modern slavery risk within the Urban Utilities supply chain is low.

Urban Utilities will continue to expand our understanding of modern slavery risks within our supply chain by continuing to conduct risk assessments of our existing tier one suppliers and all new suppliers engaged as a result of future procurement activities.



2.5 Impacts of COVID-19 on our supply chain

Urban Utilities recognises that COVID-19 may have increased modern slavery risks in parts of its supply chain due to the need to engage alternative suppliers through fast-track procurement processes. Alternative suppliers were engaged predominately for the supply of personal protective equipment and hygiene consumables. We sought to mitigate modern slavery risks, where possible, including by relying on existing suppliers, sourcing products locally and working collaboratively with new suppliers.

Where alternative emergency suppliers will remain part of our supply chain for FY20/21 – as part of Urban Utilities continuing to expand its understanding of the modern slavery risks in its supply chain – risk assessments will be conducted in respect of those suppliers.

3. OUR ACTIONS TO ACCESS & ADDRESS MODERN SLAVERY RISKS

To ensure Urban Utilities is well positioned to understand, assess and address our modern slavery risks, we sought advice from an external advisor with experience in modern slavery compliance, supply chain risk assessment and human rights issues to develop a set of recommendations to uplift our modern slavery related controls. These recommendations were formulated having regard to our risk profile, following review of our current policies, processes and risk mitigation controls, and considering industry best practice.

The recommendations have been included in Urban Utilities' Modern Slavery Action Plan, which sets out activities to be completed year on year to ensure we lift our controls to mitigate modern slavery risks. This year, our focus was on identifying our current position in respect of existing controls and implementing foundational work which we can continue to embed in future years.

Key activities completed during FY19/20 are detailed below:

3.1 Building our understanding and capabilities

We improved our understanding of and capability to manage modern slavery risks through:

- Commissioning the development of a Modern Slavery Risk Assessment Tool, which included assessing the inherent risk of modern slavery within our operations and supply chains.
- Developing and implementing Modern Slavery Awareness Training which has been completed by Urban Utilities' procurement practitioners.
- Updating content on the Urban Utilities website and intranet to include information about the Modern Slavery Act 2018 (Cth) and what actions we are taking to address this. This included developing and publishing a Modern Slavery Factsheet.
- Communicating the new Human Rights Act 2019 (Qld) and Modern Slavery Act 2018 (Cth) to our people and suppliers.

 Attending external forums to increase our knowledge and understanding of the Modern Slavery Act 2018 (Cth) and improve our awareness of modern slavery and its affects.

3.2 Improving our policies, procedures and standards

We reviewed our existing policies and processes to ensure human rights and modern slavery obligations are clearly established through the following activities:

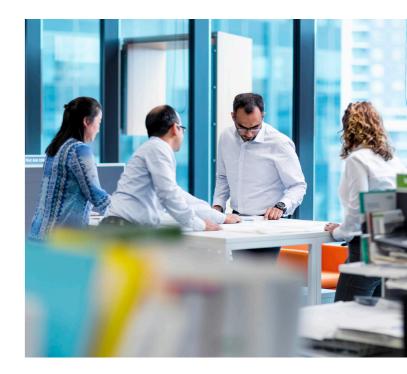
- Urban Utilities' Procurement Policy This policy sets out the principles that govern the procurement of all goods and services by Urban Utilities. The procurement principles centre not only on securing value for money but conducting business with ethically and socially responsible suppliers, including adopting a risk-based approach to eliminate modern slavery from our supply chain. This policy is underpinned by procedures, tools and templates which ensure that human rights and modern slavery risks are considered as part of the procurement planning, due diligence and decision-making process.
- Grievance and Remediation Urban Utilities encourages the reporting of modern slavery concerns as a key means of ensuring issues are identified and addressed. Specifically, our UrbanDisclosure Program provides a confidential mechanism for our employees, suppliers, community and stakeholders to report modern slavery concerns.
- Complaints Handling We incorporated human rights considerations into our complaints handling processes and procedures, with complaints of a human rights nature categorised as high priority, and modern slavery whistle-blowers protected under our Public Interest Disclosure Program Procedure.
- Operationalisation We implemented procedures to ensure human rights and modern slavery issues are considered as part of our policy development and review processes.

3.3 Supplier due diligence and engagement

We established expectations with our existing and new suppliers of goods and services to Urban Utilities and commenced a program of work to better understand the risks of modern slavery in our supply chain through:

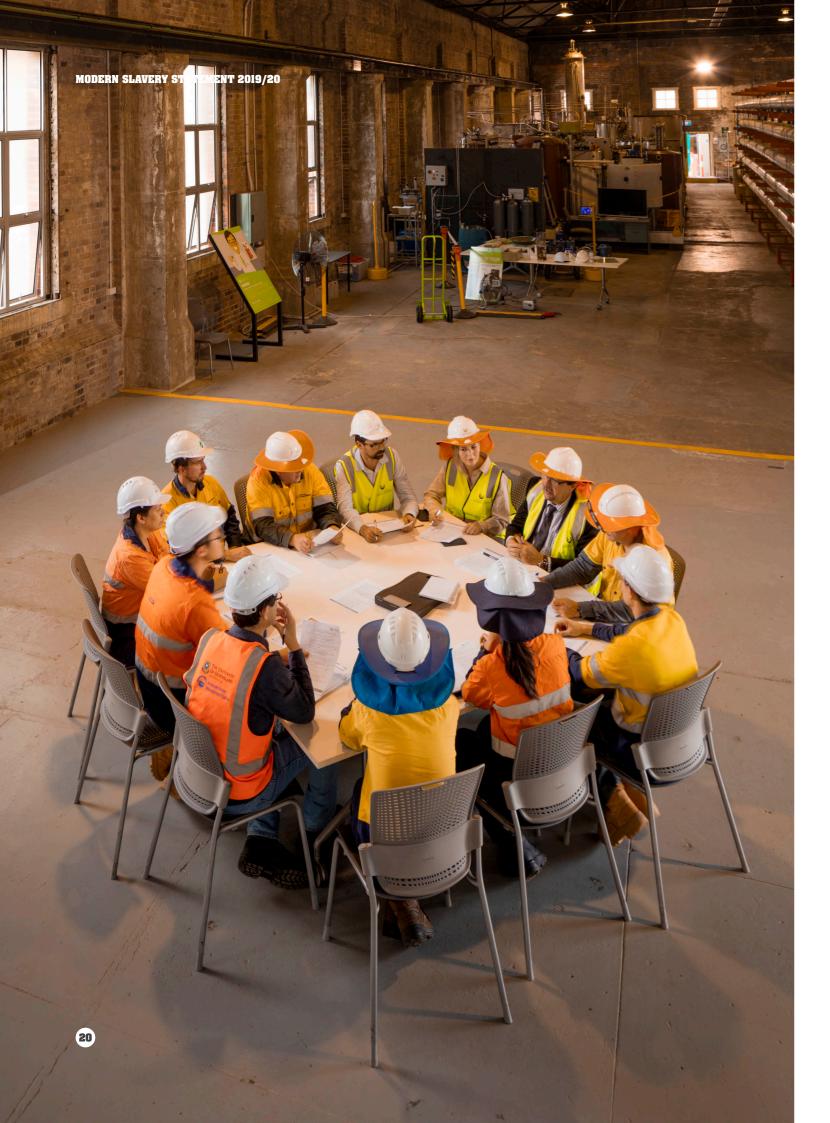
- Supplier Code of Conduct Urban Utilities' Supplier Code of Conduct, launched in January 2020, outlines our commitment to doing business with ethically, environmentally and socially responsible suppliers. The Supplier Code clearly communicates Urban Utilities' expectations of our suppliers and their supply chain, in supplying goods and services to us. The Supplier Code draws upon internationally recognised standards and is aligned with Urban Utilities' strategic goals and objectives. New and existing suppliers are required to demonstrate their commitment to and compliance with the standards and expectations outlined in the Supplier Code via a formal letter. Our Supplier Code is a key component of our overall approach to responsible procurement.
- **Supplier onboarding** All potential suppliers are subject to a due diligence process, which includes our procurement tendering processes. Specifically, our Invitation to Offer and Request for Quote documents have been updated to incorporate modern slavery related questions. The types of questions differ depending on the goods or services being procured. The information gathered through this process is aligned with the information needed for our Modern Slavery Risk Assessment Tool. The information provided in response to these questions assists Urban Utilities to identify potential areas of risk. Where additional information is required, suppliers may be required to complete further due diligence through the completion of a Modern Slavery Supplier Questionnaire. Suppliers that are identified as having a high risk will be subjected to continuous monitoring by our Group Procurement team via our contract management and supplier relationship management frameworks.

- Contract terms and conditions We have updated our standard contracts for goods and services to include modern slavery obligations and reflect the expectations and commitments set out in our Supplier Code of Conduct. A clause bank of Modern Slavery terms and conditions has also been developed, which is included in contracts with suppliers in relation to their risk profile.
- Modern Slavery Supplier Questionnaire To ensure we have an understanding of the risks of modern slavery in our supply chain, a Supplier Questionnaire has been distributed to 50 key suppliers. As mentioned above, this questionnaire may also be issued to new suppliers if further information needs to be gathered as part of the Invitation to Offer process.
- Modern Slavery Checklist A checklist was developed to provide guidance to internal stakeholders conducting a high-level assessment of modern slavery risks for low-value goods and services being purchased.









4. EFFECTIVENESS OF OUR ACTIONS

During FY19/20, we completed the following activities to assess the effectiveness in addressing the risk of modern slavery in our operations and supply chains:

4.1 Establishment of a Modern Slavery Working Group

The cross-functional Modern Slavery Working Group provided Urban Utilities with an appropriate platform to assign activities and accountabilities for modern slavery and human rights risk management, raised awareness of modern slavery issues and intel received from across the business, as well as a forum for discussing the progress and review of the effectiveness of the actions being undertaken by Urban Utilities.

4.2 Gap analysis and baseline established

Urban Utilities undertook a comprehensive external and internal review to understand our modern slavery risks. Urban Utilities' Modern Slavery Action Plan sets out activities to be completed year on year to implement controls to mitigate our modern slavery risks and implement assurance activities to provide oversight that the risks are being managed.

4.3 Risk assessment of tier one suppliers

Our 930 tier one suppliers were assessed via our Modern Slavery Risk Assessment Tool. Following the completion of the initial risk assessment, the Modern Slavery Supplier Questionnaire was forwarded to suppliers of known high-risk categories to enable Urban Utilities to gain an understanding of the controls our suppliers have in place to identify and mitigate modern slavery risks. As at 30 June 2020, Urban Utilities had received responses from 50 suppliers. We are committed to increasing our understanding of modern slavery risk in our supplier base in future years and will review the effectiveness of the risk assessment process with our people, suppliers and advisors.

4.4 Development and implementation of Modern Slavery Training

As at 30 June 2020, all 27 procurement practitioners had completed the Modern Slavery Awareness Training, which includes knowledge checks. Employees covered will increase year on year as the training, and refresher training, is rolled out to additional core functions across the business, including our Executive Leadership Team, contract managers, human resources team, and risk and compliance teams. We will review the effectiveness of this training with our people and advisors.

4.5 Complaints or grievance mechanisms

We monitor and report on the disclosures made by employees, suppliers, community and stakeholders through our UrbanDisclosure hotline and complaints made via our corporate complaints management framework. Arrangements are planned to ensure that complaints made to this hotline relating to modern slavery will be referred to the appropriate area to ensure our controls are mitigating our modern slavery risks.

5. PLANNED NEXT STEPS

Urban Utilities is committed to continually improving our understanding and management of modern slavery risks. We expect our approach to managing the risk of modern slavery to continue to evolve as we learn from our risk assessments, refine our practices and continue to build knowledge and capacity across our business.

Looking ahead, we plan to progress the controls identified through our gap analysis assessment, which include the following key activities:

5.1 Continue building our understanding and capabilities

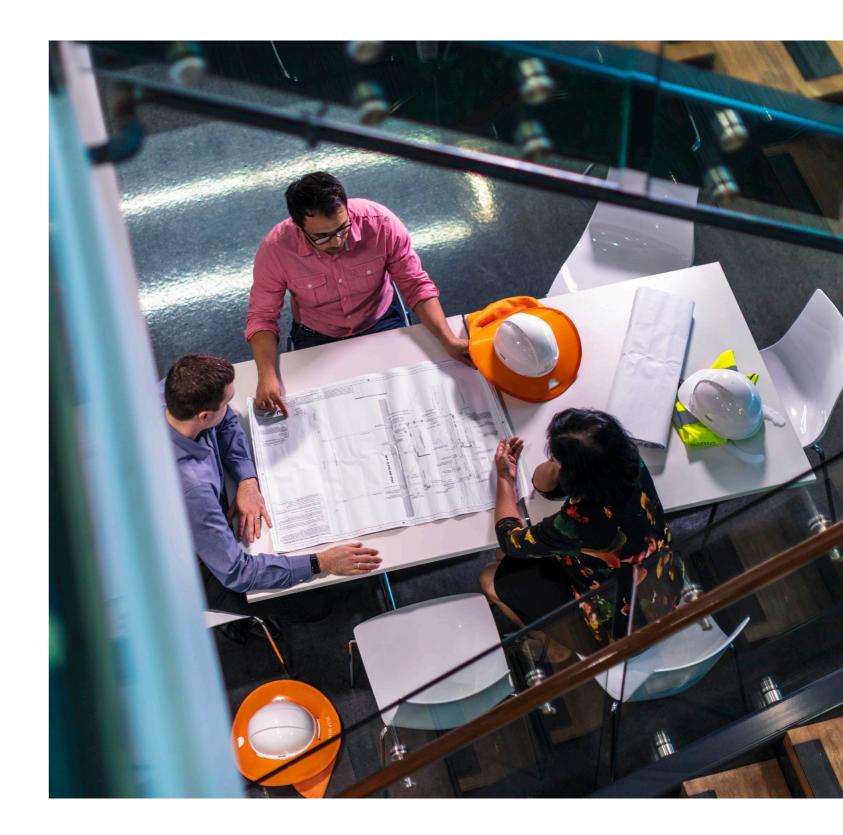
- Continue to roll out our Modern Slavery Awareness Training to ensure our people have an understanding and awareness of modern slavery risks in our operations and supply chain.
- Include modern slavery indicators in our media monitoring program in order to be alerted to reported or suspected instances of modern slavery and human rights breaches at a state, national and international level, involving current or potential suppliers and relevant industries.

5.2 Continue to improve our policies, procedures, standards

- Further embed supply chain due diligence processes to ensure modern slavery risks are evaluated effectively during procurement processes.
- Conduct spot checks on business units that conduct purchasing activities to validate they are completing high-level modern slavery risk assessments.

5.3 Continue to embed supplier due diligence and engagement

- Continue to assess and map Urban Utilities' supply chain, including new and existing suppliers via the Modern Slavery Supplier Questionnaire.
- Engage with our suppliers in the high-risk profile as part of our contract management and supplier relationship management frameworks
- Embed modern slavery contract clauses into high-risk contracts, including contracts with contingent labour providers.
- Update our purchase order terms and conditions to ensure modern slavery is included in low-value purchases of goods and services.







6. OTHER RELEVANT INFORMATION

Urban Utilities provides sponsorship and support to a number of organisations supporting our communities' most vulnerable, including:

- Orange Sky Laundry (services for homeless) The Orange Sky Laundry's mission is to positively connect people in need through free laundry, showers and conversation. Our sponsorship began in 2016 and funds 80 shifts of the Orange Sky laundry and shower services per annum in Brisbane.
- Salvation Army's Red Shield Appeal, Ipswich The Red Shield Appeal is the Salvation Army's signature fundraising drive, raising funds for Ipswich-based social and community services with a focus on homeless and accommodation services, including domestic violence, financial counselling and youth support. We have a long association with the appeal, beginning in Brisbane (2011-2014) and moving to Ipswich in 2015.
- Thriving Communities The Thriving Communities Partnership is a cross-sector collaboration with the goal that everybody has fair access to the modern essential services they need to thrive in contemporary Australia, including utilities, financial services, telecommunications and transport. The Thriving Communities Partnership aims to build more resilient communities and stronger organisations. Urban Utilities has just signed our second-year partnership with Thriving Communities.

During this reporting period, Urban Utilities' representatives actively participated in external forums (both legal and government led) to increase our knowledge and understanding of the legislative framework governing modern slavery and human rights, as well as the impacts of modern slavery and human rights breaches on affected individuals, our business and supply partners, and the community.

We look forward to working with and contributing to business, industry, government and community forums in order to play an active role in addressing and combating modern slavery in Australia.



