



# Modern Slavery Statement

For the Period 1 July 2021 to 30 June 2022





## Letter from the WaterNSW Board of Directors

The Commissioner  
Australian Border Force  
Department of Home Affairs

17 November 2022

Submitted online via [slavery.consultations@abf.gov.au](mailto:slavery.consultations@abf.gov.au)

Dear Commissioner

I am pleased to submit the Modern Slavery Statement for WaterNSW, for the period 1 July 2021 to 30 June 2022 to the Department of Home Affairs for publication on the Online Register for Modern Slavery Statements, as required under the Commonwealth Modern Slavery Act 2018 (the Act).

WaterNSW respects human rights and fully supports the objectives of the Act. It opposes, and takes action to combat, modern slavery in our operations and in the operations of our suppliers.

This Modern Slavery Statement is for the WaterNSW Group, which includes WaterNSW (ABN: 21 147 934 787), a statutory State-Owned Corporation constituted under the State-Owned Corporations Act 1981 (NSW) and the Water NSW Act 2014 (NSW); and its fully owned subsidiary, WaterNSW Infrastructure Pty Limited (ABN: 93 629 813 270).

This Modern Slavery Statement was approved by the Board of Directors of both WaterNSW and WaterNSW Infrastructure Pty Limited at their November 2022 board meeting.

Yours sincerely,



Peter Duncan AM  
Chair



## About WaterNSW

### Who we are

WaterNSW supplies two-thirds of the raw water used in NSW.

However, we are more than system operators. We are catchment protectors. We maintain and operate the assets that supply water to our customers and communities. We effectively manage and deliver water, particularly in times of drought and flood and we are transparent in all that we do.

We are advocates for our customers, educators to the broader community, and are committed to building collaborative and productive partnerships, and contributing to the prosperity and continued growth of communities across NSW.

WaterNSW is a State-Owned Corporation established under the Water NSW Act 2014 and operates under an Operating License issued and monitored by the Independent Pricing and Regulatory Tribunal (IPART).

WaterNSW is also the 100% shareholder and parent of WaterNSW Infrastructure Pty Ltd.

This Modern Slavery Statement covers both entities of the WaterNSW Group.

### Our purpose

Water, delivered when and where it matters.

### Our vision

To support the resilience of NSW communities through our leadership in delivering water services, for generations to come.

### What we do

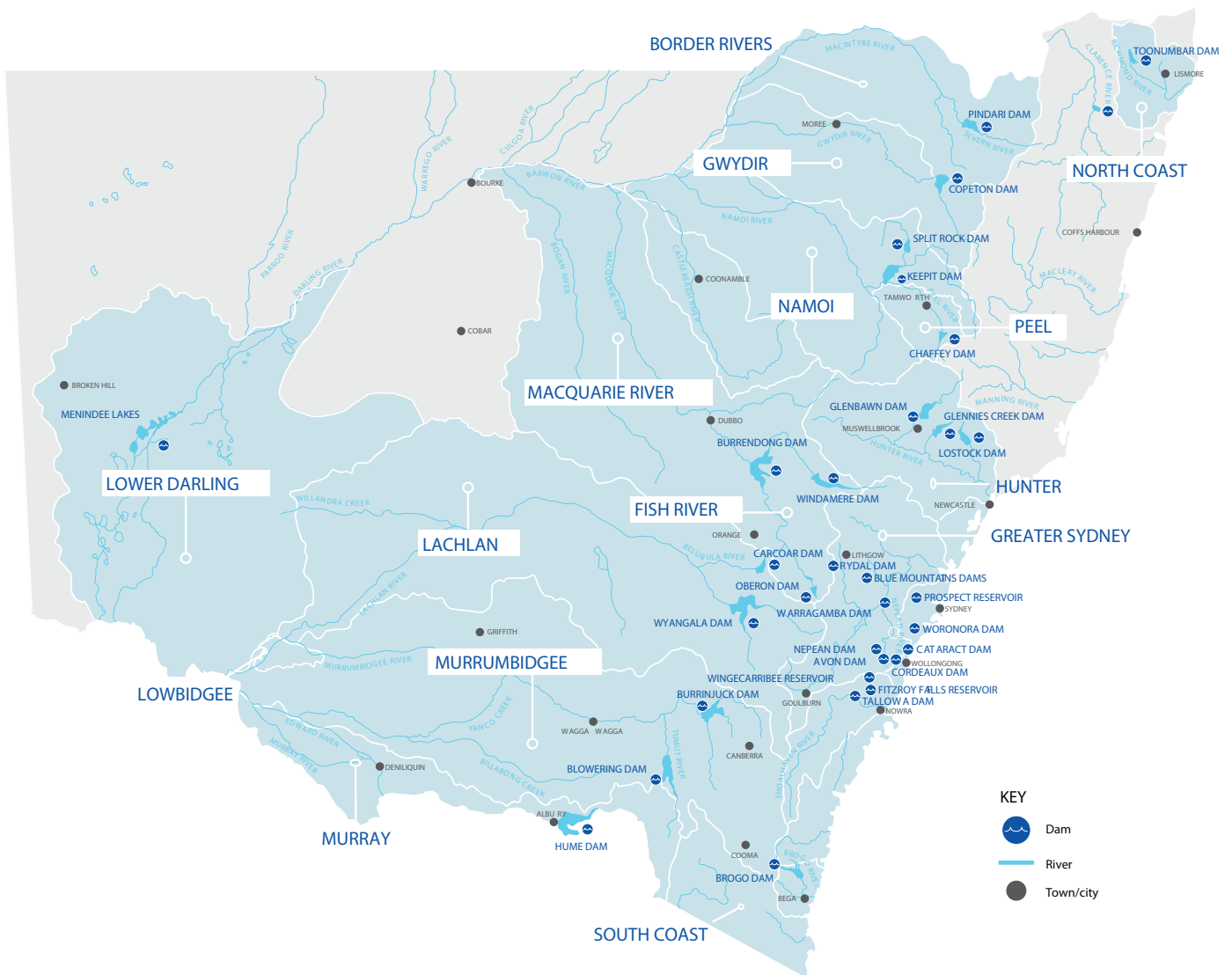
- **Source water protection:** protection of the Greater Sydney drinking water catchment to ensure safe water is supplied to Sydney Water, local councils and other distributors for treatment and distribution to their customers.
- **Bulk water supply:** supply water from our storages to customers in the Greater Sydney drinking water catchment, and in the state's regulated surface water systems.
- **System operator:** efficient management of the state's surface and groundwater resources to maximise reliability for users through operation of the state's river systems and bulk water supply systems, in collaboration with the Murray-Darling Basin Authority which directs operations of the River Murray system.



- **Infrastructure planning, delivery and operation:** meet customer-defined levels of service consistent with NSW Government policy and priorities to increase the security and reliability of water supplies to our customers and communities of NSW.
  - **Customer water transaction and information services:** provide efficient and timely services to our customers for water licencing and approvals, water trades, billing and meet their water resource information needs for surface and groundwater quantity and quality.
- Our Strategic Priorities 2021 - 2025**
- **Building a sustainable future:** we will play our part in creating a more resilient water system. One which enables thriving communities and healthy ecosystems, whilst reducing our environmental footprint – so we don't cost the earth.
  - **Developing our people and capabilities:** we will develop and employ a diverse, high performing workforce. One that is responsive to the needs of our customers and the communities we serve.
  - **Respected by the customers and communities we serve:** we aim to be even more trusted to support the social, cultural and economic prosperity of our customers and communities, through transparent decision making and having a greater community presence.
  - **Working together in partnership:** we are committed to working together in partnership with our stakeholders to manage sustainable, secure, and healthy water resources.
  - **Delivering operational excellence:** we have deep expertise in technical and operational elements of water delivery. We will continually extend this expertise to deliver safe, reliable, and affordable water management and delivery.

## Our area of operations

Through our employees and contractors located across the state, we provide essential water services daily to tens of thousands of customers across NSW and manage our extensive operational assets, water monitoring and metering networks.



## Our Corporate Governance Structure

WaterNSW is constituted as a statutory State-Owned Corporation (SOC) under the *State-Owned Corporations Act 1981* (NSW) and under the *WaterNSW Act 2014* (NSW). WaterNSW Infrastructure Pty Ltd is a wholly owned subsidiary of WaterNSW.

We are regulated by several regulators, including:

- The Independent Pricing and Regulatory Tribunal (IPART) for operating licence compliance and customer pricing.
- The Environmental Protection Agency (EPA), and the Natural Resources Access Regulator (NRAR).

## Our Governance Structure:

### Voting Shareholders/Shareholding Ministers of WaterNSW

- NSW Treasurer.
- NSW Minister for Finance and Small Business.
- Shareholders and share capital established under 20H State Owned Corporations Act 1989 (NSW).

### Portfolio Minister of WaterNSW

- NSW Minister for Water Property and Housing.
- Role of Portfolio Minister established under 20I *State Owned Corporations Act 1989* (NSW).
- May give directions to WaterNSW in consultation with the Treasurer or shareholding ministers (subject to the *State Owned Corporations Act 1989* (NSW), *WaterNSW Constitution*, *WaterNSW Act 2014* (NSW)).

### WaterNSW Board of Directors

- Directors are appointed by the voting shareholders (section 8 *WaterNSW Act 2014* (NSW)).
- Board complies with NSW Treasury Policy TPP 17-10: *Guidelines for Governing Boards of Government Businesses*.
- Accountable to the Voting Shareholders (see section 10 *State Owned Corporations Act 1989* (NSW) and the *WaterNSW Constitution*).
- Subject to the direction of the Portfolio Minister (*WaterNSW Constitution* clause 5.5 (d)(i)).

### WaterNSW

Statutory State Owned Corporation - Parent Entity

- Established under the *WaterNSW Act 2014* (NSW) and Schedule 5, *State Owned Corporations Act 1989* (NSW).
- Functions specified in *WaterNSW Act 2014* (NSW) and pursuant to Operation Licence (issued by IPART).
- Subject to *WaterNSW Constitution*.

#### WaterNSW Infrastructure Pty Ltd

(controlled entity - wholly owned subsidiary)

- Established 5 November 2018 under the *Corporations Act 2001* (Cth) as a wholly owned subsidiary of WaterNSW to provide bulk water transmission services for the supply of raw water to Essential Water in Broken Hill as the local water provider.
- Operates under the commercial disciplines of the NSW Government's Commercial Policy Framework.

# Introduction

This is our third statement and outlines our actions and systems in place to mitigate the risk of slavery and human trafficking during the 2021/22 financial year.

We are progressing with our commitment to eradicate Modern Slavery from our operations and supply chain and to the best of our ability, ensuring that all goods and services provided by suppliers are not the product of modern slavery.

We have not identified any instances of modern slavery within our operations or supply chain, nor have we received any reports of potential instances of modern slavery from our staff, customers or suppliers. However we are not complacent and remain committed to keeping our approach under continual review.

## What we have achieved during the 2021-2022 Financial Year



**Dedicated training and awareness sessions** held for WaterNSW staff and contractors



**Supported Anti-Slavery Day** through internal communications



**Continued supplier engagement** including awareness communications and the reissue of our Supplier Code of Conduct



**Evolved and implemented our Supply Chain Risk Monitoring solution and assurance process** to identify potential risk exposure and work collaboratively to mitigate risks with our suppliers



**Regular cascade of shared modern slavery communication** to employees and suppliers as part of our continual awareness communication plan



**Established collaboration** across the industry in NSW with the Water Utility Sector



**Introduced some new key performance indicators (KPIs)** to help us to monitor and report on the effectiveness of our actions to mitigate against modern slavery



**Incorporated the new requirements of the Modern Slavery Act 2018 (NSW)** to ensure we continue to meet our modern slavery obligations across both Commonwealth and State Governments





# Governance

Our established Modern Slavery Working Group drives the development and delivery of our approach across WaterNSW. It includes representation from core functions key to driving change, including Procurement, Risk and Compliance, Safety, People and Culture and Legal. The Modern Slavery Working Group reports to the Executive Manager Finance, Legal & Risk and through to our Audit & Risk Committee. The WaterNSW Board oversee and sign off on our approach annually.

## Modern Slavery Monitoring & Reporting

### Respond to evidence requests to address modern slavery by suppliers

Requests are sent to [customer.helpdesk@waterNSW.com.au](mailto:customer.helpdesk@waterNSW.com.au)

Responses are compiled by Procurement Governance & Excellence Manager within 5 days.

Responses from Working Group are required within 3 days.

Tracking of requests are monitored by Procurement Governance & Excellence Manager.

### Reporting Instances of Modern Slavery

Calls lodged with Your Call Hotline (independent)

Reports lodged with Your Call are forwarded and assessed by Corporate Lawyer Regulatory & Compliance as they arise.

Instances are reported annually in the Annual Modern Slavery Statement.

### Annual Modern Slavery Statement

KPI and progress report provided to the Executive Manager Finance, Legal & Risk and Audit & Risk Committee by the Manager Procurement, Corporate Property & Services, on a bi-annual basis.

Annual statement submitted to Audit & Risk Committee & Board by Executive Manager Finance, Legal & Risk and Manager Procurement, Corporate Property & Services

- Draft for review in September
- Final for approval in November

Made available to the public in December by Manager Procurement, Corporate Property & Services by

- Lodging with Department of Home Affairs;
- Publishing on WaterNSW Website.



## NSW Water Sector Modern Slavery Working Group

Water Utility providers (Sydney Water, Hunter Water and WaterNSW) met three times during 2021-22 to identify opportunities for information sharing and collaboration. Over the course of the year, our Modern Slavery statements have been peer reviewed to help identify similar initiatives and actions where we may be able to collaborate with others in our sector to drive collective action.

### Our Operations

Our Code of Conduct sets the tone for the organisation. Modern slavery has now been incorporated in the online Code of Conduct learning that aims to provide clear guidance on the standard of behaviour expected from all employees and contractors, and should be read in conjunction with relevant policies, procedures, and industrial instruments.

The online learning was relaunched in April 2022 and includes a high-level explanation of modern slavery, a quick quiz and a link to the WaterNSW Modern Slavery Statement. The training is mandated for all staff to complete and is valid for 2 years.

Our process for reporting wrongdoing enables any concerns to be raised. We continue to contract with Your Call Whistleblowing Solutions ("Your Call") to receive and manage reports of possible breaches with impartiality and confidentiality. This option allows staff (or anyone else who uses the service) to remain completely anonymous, identify themselves to Your Call only, or identify themselves to both Your Call and WaterNSW.

### Our people

At WaterNSW, safety is our highest priority, and this is complimented by our commitment to **#ValueOurPeople**. We know that an inclusive and diverse workplace improves employee wellbeing and engagement, enhances creativity and innovation, and enables a better connection with our customers and the communities we live and work in.

**Respect** is our Inclusion & Diversity Program that sets out our commitment:

- Promoting awareness, understanding and appreciation of inclusion and diversity;
- Creating a culture of belonging where our people feel valued and respected; and
- Growing the diverse representation of our workforce to reflect the communities we operate in.

We believe our overall risk of modern slavery within our workforce is low due to the nature of what we do, and the compliance checks we have in place. 84% of our employees are permanent, 11% are on fixed term contracts and our use of contingent labour hire staff is low (5%). Contingent labour hire staff undergo similar compliance checks to our permanent staff prior to on-boarding. It is a requirement of our enterprise agreement that any labour hire worker be paid no less than the amount that would otherwise be paid to a WaterNSW employee performing similar work.

As part of our recruitment and onboarding process, we conduct thorough compliance checks for all workers, including temporary staff who join our business. These include, but are not limited to:

- Right to Work;
- Occupational medical;
- Criminal background check; and
- Professional qualifications and education.

Passing these checks is a pre-requisite before an employee can start work with us. For our contingent labour staff, our service provider completes compliance checks on our behalf, except for criminal background checks which are undertaken by WaterNSW.

Any concerns are flagged and addressed with employees and hiring manager directly.



## Our Supply Chain

We have systems in place to identify and assess potential risk areas within our supply chain and to mitigate any identified areas of risk. We encourage our suppliers and contractors to report any concerns that slavery or human trafficking may be, or is, taking place via Your Call.

Our standard procurement processes include a variety of checks and reviews designed to make sure that suppliers we engage with have the capability and capacity to comply with our policies and commercial terms. We also check that our contracts undergo appropriate legal assessment and have appropriate contract clauses in place.

We regularly look to improve our supply chain processes. In December 2021, we implemented Beroe's Know Your Supplier (KYS) Risk Management Solution which is a cloud-based offering that enables the Procurement team to assess our suppliers across key risk and compliance parameters. These parameters include human rights violations; adverse media mentions; corruption, fraud, criminal regulatory issues; and financial risk.

We introduced tailored training for our procurement team in 2022 to help them identify high-risk commodities and services during the procurement planning stage and throughout the procurement life cycle.





## Our spend profile 2021 – 2022 financial year

During the financial year, WaterNSW spent \$160 million through its supply chain, and relied on almost 1,100 suppliers to deliver the required goods and services to support our business operations.

Our highest risk of modern slavery remains within our supply chain due to its complexity. Construction, Information Technology and Communications, Property, Facilities Management and Contract Labour categories remain our highest risk areas of spend.

Category	Total Value \$m	Modern Slavery Risk		
		high	medium	low
Civil Construction	\$33	Construction labour and raw materials		
Asset Maintenance & Water Quality	\$31	Asset maintenance raw materials		
ICT & Communication	\$30	Laptops, computers and mobile phones		
Engineering Services	\$18			
Professional Services	\$17			
Property, Fleet & Utilities	\$17	Cleaning, security		
Insurance	\$6			
Contractor & Temporary Labour	\$5	Contingent labour hire		
Other	\$3			
<b>Total</b>	<b>\$160</b>			

**Construction:** The majority of the \$33m spend during FY22 was for construction and installation works, with a small amount of spend (\$42,522) on a capital equipment purchase. We introduced a strategic model for construction (Asset Renewal & Replacement (ARR)) in 2021. This includes contracts with two construction partners that allows us to consider and address risks, during the year the focus has been on Covid and geopolitical events to secure supply and manage potential price increases due to skill and material shortages. As the model matures it will create the opportunity for more collaboration on modern slavery supply chain risks, above and beyond the due diligence undertaken during the tender process and the alerts we receive from our Know Your Supplier (KYS) Risk Management Solution.

More analysis is required in the **Asset Maintenance & Water Quality** category to better understand what raw materials are being purchased and the associated modern slavery risk that may need addressing.

**ICT & Communications:** The Global Slavery Index lists laptops, computers & mobile phones as the number 1 at-risk products of modern slavery. Spend analysis based on GL codes used in our finance system, indicates that there was \$2m (6.5%), out of the \$30m category spend, was spent on IT equipment/hardware during the financial year through established contracts. More than 50% of the spend during FY22 was on IT professional services, \$3m on telecommunications and \$8.5m on IT software purchases, licences or subscriptions. Category plans are being finalised to support decisions around the future procurement strategies that include consideration of modern slavery risks and how we can work with our suppliers to help mitigate these risks.

**Property, Fleet & Utilities:** We continue to use the NSW Government Cleaning contract which ensures that applicable employment guarantees to cleaners are in place, ensuring their welfare. We also use the NSW Government Integrated Security Contract that ensured compliance with NSW Government's Procurement Policy Framework, Modern Slavery objectives and Fair Work when it was established in February 2021. Although these are whole of government arrangements, the suppliers have still been provided with a copy of our Supplier Code of Conduct, outlining our expectations of them as a supplier to WaterNSW and have access to Your Call if they wish to report any concerns.

During 2022/23, a strategy is due to be developed for property and facilities management that will incorporate modern slavery considerations and evaluation criteria should there be a market approach.

**Contractor & Temporary Labour:** We went live with a new Contractor Central model in July 2022 which consists of a Managed Service Provider (MSP) and Vendor Management Solution (VMS). This strategic model provides greater visibility of our contingent labour hire supply chain that will enable a partnership with the MSP provider Kelly OCG to better assess and address our modern slavery risk collaboratively. As previously mentioned, compliance checks are carried out prior to the engagement of a contingent labour hire.

## Risk indicators considered in relation to our spend categories

There are common indicators that increase the likelihood that modern slavery is occurring in the supply chain. The table below contains key risk indicators for modern slavery and related risk factors. During our category management and procurement planning, we assess the level of modern slavery risk as far down the supply chain as reasonably practicable using the key risk indicators as a guide.

Modern Slavery Risk Indicators	Sector and industry risks	Products or services risk	Geographic risks (where the production/labour typically occurs)	Supply chain model risks
<b>Risk factors</b>	<ul style="list-style-type: none"> <li>• Informal or unregulated sector</li> <li>• Little visibility over lower tier suppliers</li> <li>• Seasonal work</li> <li>• Low pay</li> <li>• Dangerous work</li> </ul>	Product or service often involving <ul style="list-style-type: none"> <li>• lower wages and/ or</li> <li>• manual labour</li> </ul>	<ul style="list-style-type: none"> <li>• Location with poor governance</li> <li>• Weak rule of law</li> <li>• Conflict</li> <li>• Corruption</li> <li>• Displacement</li> <li>• State failure to protect human rights</li> <li>• Migration flows</li> <li>• Socio-economic factors such as poverty or widespread discrimination</li> </ul>	<ul style="list-style-type: none"> <li>• Larger and more complex supply chains that are difficult to monitor</li> <li>• Sub-contracting and use of labour recruiters</li> <li>• Recruitment fees may be charged</li> </ul>
<b>Examples</b>	<b>Industries:</b> Extractives, textiles and fashion, fishing, ICT and electronics, cleaning, and agriculture.	<b>Products:</b> Bricks, cotton, tea, and rubber.  <b>Services:</b> Cleaning.  The Global Slavery Index provides a list of top products imported by G20 countries at high risk of modern slavery.	<a href="#">Freedom House</a> rates people's access to political rights and civil liberties in over 200 countries and territories.  The Global Slavery Index also provides information on high-risk countries.	<b>Industries:</b> Construction, Manufacturing - many industries may carry this risk.







## What we have done to address our Modern Slavery risks within our Operations and Supply Chain during 2021-2022

During 2021-22, the Working Group continued to understand our modern slavery risk and increased its focus on supplier communication, risk management and measuring the effectiveness of our modern slavery actions. The continuous improvement initiatives undertaken are summarised below:

### 1. Raising awareness

Following a review of our training courses, particularly our mandatory onboarding courses for new starters, we have refreshed the material and streamlined the number of courses.

The modern slavery training has been embedded into our Code of Conduct. The Code of Conduct course is mandatory for all new starters as part of the onboarding process and needs to be completed every two years by all employees and contractors.

More focussed training has been provided for procurement staff and contract managers, to provide clarity on what they need to consider in their roles when selecting and setting up commercial arrangements with suppliers.

A communication plan has been developed, in consultation with our Communications team, to ensure periodic messaging throughout the year, to keep modern slavery front of mind for our staff. We have also provided two lunch and learn sessions for staff to learn more about modern slavery and to raise any questions and/or concerns that they may have.

We set out the expectations of our suppliers in ensuring they are doing everything they can to eradicate modern slavery from their organisation and supply chain in our Supplier Code of Conduct, Procurement event information (such as tender documentation and supplier briefings) as well as in our Contracts.

### 2. Evaluating our performance

Key performance indicators (KPIs) help us to monitor and report on the effectiveness of our actions to mitigate against modern slavery, we review these quarterly. We introduced KPIs, aligned to our Corporate Risk Management Plan and Reporting Framework, during 2022 to provide a holistic performance view of both our operations and our supply chain.

KPI	Description	Freq	Target	Q3 FY22 Result	Q4 FY22 Result
<b>Speaking up without fear of retribution</b>	% favourable responses from employees for Empowerment / Autonomy	Annual	90%	N.A	Awaiting results of 2022 MySay Pulse Survey
<b>Modern Slavery training</b>	% eligible staff who have completed the Modern Slavery training	Quarterly	95%	80%*	83%**
<b>Non-compliant suppliers</b>	# of suppliers with instances of Modern Slavery	Quarterly	0	0	0
<b>Suppliers with suspected MS instances</b>	# of suppliers with suspected instances of MS reported	Quarterly	0	0	0
<b>Supplier code of conduct</b>	% of suppliers who have accepted WaterNSW Supplier Code of Conduct during tender response	Quarterly	100%	100%	100%

\*an additional 32 staff completed the training who were not mandated to do so

\*\* an additional 34 staff completed the training who were not mandated to do so

### 3. Supply chain risk management

We implemented a Supply Chain Risk Management solution, Beroe “Know Your Supplier” that provides a risk rating and notifies Procurement of any changes to the risk profile via email to the procurement team. To date there have been no specific modern slavery risks identified.

Beroe “Know Your Supplier” provides the following risk analysis across our strategic suppliers, which includes Modern Slavery:

Risk Component	Number of Suppliers	Volume of Contracted Spend
<b>Finance health check</b>	120	~80%
<b>Ethical and regulatory issues</b> <ul style="list-style-type: none"> <li>• Fraud and corruption</li> <li>• Regulatory issues</li> <li>• Sanctions and Sanction violations</li> </ul> <b>Environmental issues</b> <ul style="list-style-type: none"> <li>• Product and/or service issues</li> <li>• Production and/or supply chain issues</li> <li>• Environmental issues</li> </ul> <b>Labour, Health and Safety</b> <ul style="list-style-type: none"> <li>• Discrimination</li> <li>• Workplace and Human Rights issues</li> <li>• Workforce disputes</li> </ul>	50	~70%

Following implementation of Know Your Supplier, we have developed a Supply Chain Risk Management framework, which we plan to roll out in FY23, to enable Procurement to work with the business stakeholders and suppliers to minimise or mitigate highlighted risks to ensure the supply of goods and services to our business.

# Summary of all key actions taken in during FY21-22

What we said we would do	What we have achieved
<p><b>Increase training and awareness</b> for targeted groups, including all Senior Managers, by rolling out the e-Learning module and awareness learning sessions</p>	<ul style="list-style-type: none"> <li>• Modern slavery training material has been incorporated into our Code of Conduct eLearning module which is mandatory for all staff.</li> </ul>
<p><b>Continue to assess</b> our training requirements proportionate to specific roles</p>	<ul style="list-style-type: none"> <li>• The assessment resulted in specific training for the Procurement team and contract managers, so they can practically apply their increased awareness and understanding of the risks of modern slavery within our supply chain to their activities when selecting and working with suppliers.</li> </ul>
<p><b>Explore</b> an appropriate staff event or communication for Anti-Slavery Day on 18th October 2021. to raise awareness of modern-day slavery and human trafficking</p>	<ul style="list-style-type: none"> <li>• We have increased staff communications through various channels such as Cascade our staff newsletter, Spendwise our eProcurement portal and Yammer, including specific articles released on Anti-Slavery Day to help raise awareness.</li> <li>• Lunch and learn sessions complimented the communication and were held every six months to continue the discussion around modern slavery, and enable staff to ask more detailed questions.</li> </ul>
<p><b>Implement</b> the Supply Chain Risk Monitoring solution to risk profile our top 50 high-risk strategic suppliers as a priority</p>	<ul style="list-style-type: none"> <li>• A Supply Chain Risk Monitoring Solution, Beroe "Know Your Supplier" was selected and implemented in 2021. Detailed risk assessments are being undertaken on our top 50 suppliers which account for approx. 70% of our contracted spend and no specific modern slavery risks were identified.</li> </ul>
<p><b>Continue assessing risk</b> across our high-risk supplier categories</p>	<ul style="list-style-type: none"> <li>• The Beroe "Know Your Supplier" platform continually updates the suppliers risk score and the procurement team review and take appropriate action when new alerts are received.</li> <li>• Category insights and reports concerning specific events e.g. Covid, Russia/ Ukraine war have been provided and reviewed so that any additional actions can be taken to mitigate risk and provide assurance of supply.</li> </ul>
<p><b>Continued communication and engagement</b> with our supply chain around our values, Code of Conduct, and expectations</p>	<ul style="list-style-type: none"> <li>• The Supplier Code of Conduct was refreshed and reissued to all current suppliers as a reminder of our expectations, and their expectations of us.</li> <li>• We have prepared and published modern slavery FAQs and why it is important to WaterNSW on our website for suppliers.</li> <li>• Supplier market briefings and tender documentation continue to include our expectations around modern slavery.</li> </ul>
<p><b>Define our key performance indicators (KPIs)</b> to help us to monitor and report on the effectiveness of our actions to mitigate against modern slavery</p>	<ul style="list-style-type: none"> <li>• Key Performance Indicators have been implemented and are now measured quarterly and discussed at our Working Group meetings.</li> <li>• The results are included in our bi-annual reporting cycle to the Audit and Risk Committee for their review and oversight.</li> <li>• Details are included in our recently established Modern Slavery Reporting Framework.</li> </ul>
<p><b>Collaborate with others</b> in our sector to drive collective action.</p>	<ul style="list-style-type: none"> <li>• Water Utility providers (Sydney Water, Hunter Water and WaterNSW) have met three times during 2021-22 to identify opportunities for information sharing and collaboration. Over the course of the year, our Modern Slavery statements have been peer reviewed to help identify similar initiatives and actions where we may be able to collaborate with others in our sector to drive collective action.</li> </ul>

## Areas of focus for 2022/23 will be:

- Continue our organisation-wide ongoing communications and engagement including modern slavery awareness, training and dedicated support of Anti-Slavery Day.
- Test effectiveness of our risk management and due diligence approach across our businesses and supply chain.
- Explore and identify further training needs both internally and in our supply chain.
- Further engagement with our supply chain and industry peers.
- Investigations into any potential breaches, and where appropriate, reports on any potential breaches within the defined timescale.

## Conclusion

We're proud of the steps we've taken over the last three years to mitigate the risk of modern slavery within our business and supply chain. We have invested in training and raising awareness, and in creating the right culture throughout our organisation.

However, we're not complacent and take our responsibility to help eradicate modern slavery in our business and supply chain seriously. We need to be aware of the consistently changing nature of modern slavery and to assess our risk annually. We're clear on our priorities for the year ahead to further eliminate the risk and are committed to continually improving our approach.







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