

Modern Slavery Statement

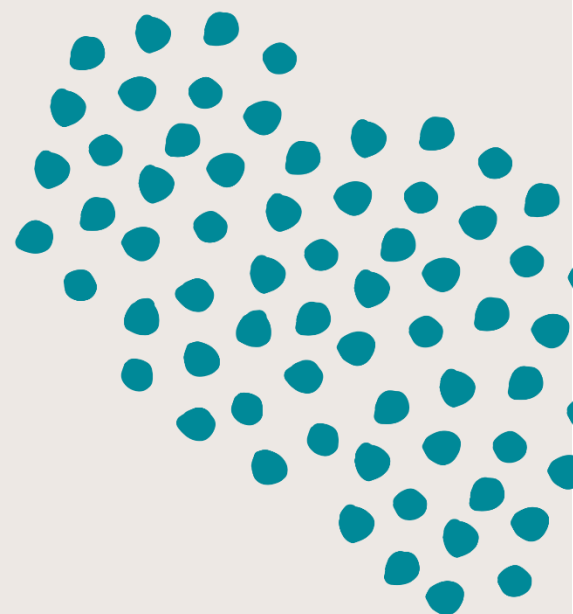
2023 – 2024



Acknowledgment

Barwon Water acknowledges the Traditional Owners of the land on which we live and work, and pay respect to Elders, past, present and emerging.

We recognise Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation who have managed water and the environment for thousands of years. It is a privilege to share in the knowledge and experiences from the oldest living culture in the world.



Message from our Managing Director

The devastating humanitarian impacts of modern slavery are global, widespread, and systemic. Poverty, gender, unemployment, migration or visa status, and level of education are just some of the interrelated factors that can increase a person's vulnerability to modern slavery. Others, like climate change, geopolitical conflict, and disasters can cause disruption and displacement, which further increase risks of exploitation.



Barwon Water takes our responsibility to maintain ethical procurement practices very seriously. We understand that who we choose to do business with, and procure our supplies from, can impact much further than the boundaries of our service region. At Barwon Water - We Care – we care about our people, customers, community, the environment and human rights. That is why we are determined to ensure we are not contributing to modern slavery.

Any form of modern slavery is unacceptable. Barwon Water is committed to doing all we can to address the risk of modern slavery and defend human rights within our operations and those of our suppliers and partners.

Barwon Water has taken a proactive approach to the management of modern slavery risk in our operations and supply chains. We are committed to striving for increasing levels of transparency and believe the best way to identify and mitigate risks is to work collaboratively with stakeholders, industry and our supply network.

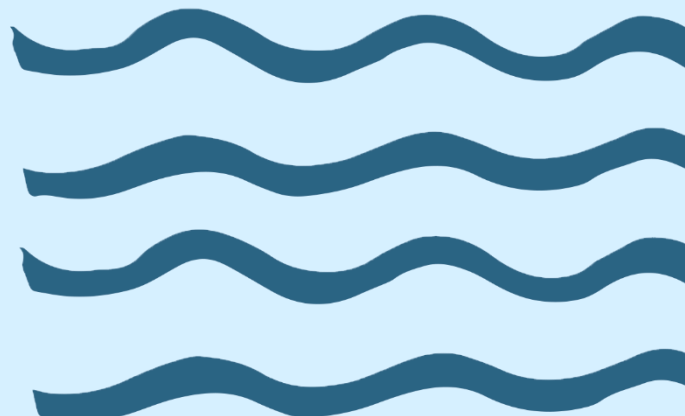
In this, our fifth year of modern slavery reporting, Barwon Water is proud of the progress we have made to date. Our capabilities to address modern slavery have matured through the implementation of policies, process and training, and we are working to further embed modern slavery awareness and risk assessment into our Procurement Governance Framework.

Whilst we have not identified any specific instances of modern slavery in our operations or supply chain, we recognise that mitigating modern slavery risk is a continuous journey and we commit to remaining focused on our continuous improvement.

I'm pleased to present our annual Modern Slavery Statement in response to the *Modern Slavery Act 2018 (Cth)*, which outlines the actions we've taken to identify, monitor and mitigate potential modern slavery risks within our operations and supply chains. This Modern Slavery Statement applies to both Barwon Water and our wholly owned subsidiary, Barwon Asset Solutions, and was approved by our Board of Directors on 19 September 2024.

A handwritten signature in black ink, appearing to read 'Shaun Cumming', written in a cursive style.

Shaun Cumming
Managing Director



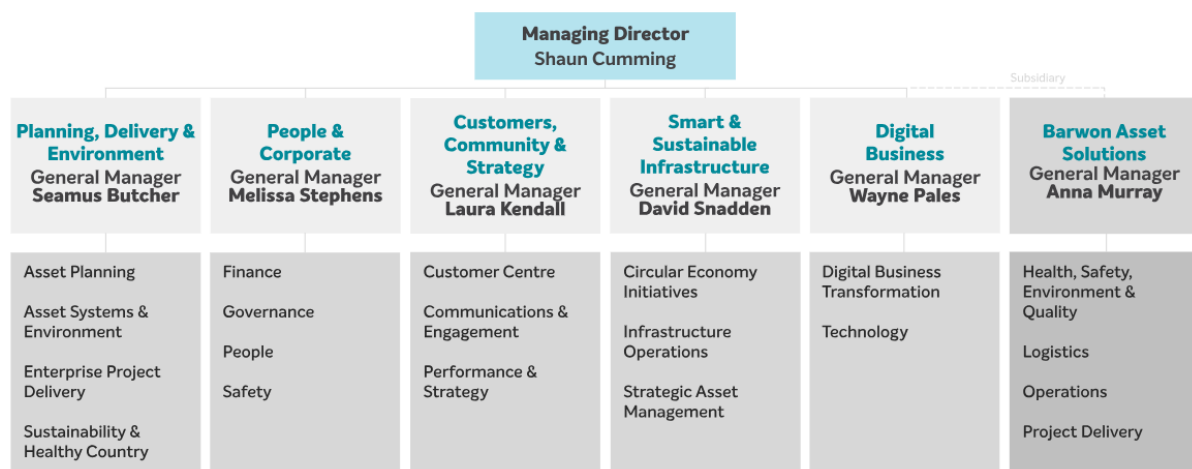


About the Barwon Water Group

Barwon Region Water Corporation trading as Barwon Water (ABN 86 348 316 514) is Victoria's largest regional urban water corporation.

A statutory corporation under the *Water Act 1989* (Vic), Barwon Water's history can be traced back to the Geelong Municipal Waterworks Trust in 1908.

With our head office in Geelong, Victoria, Barwon Water is led by a Board comprised of nine non-executive directors and the Managing Director, who are responsible for the overall corporate governance of Barwon Water, including strategic direction, management goals and measuring success. The Board is appointed by the Minister for Water and is governed by the *Water Act 1989* (Vic); it is supported by five General Managers who are responsible for leading their functional business divisions.



As a major employer in the region, Barwon Water currently has 388 operational, engineering, strategic planning, financial and administrative employees (364.87 FTE).

Barwon Water's wholly owned subsidiary, Barwon Asset Solutions (ACN 167 911 515), was formed in 2017 and is a 100 per cent locally based company. Barwon Asset Solutions provides maintenance, land and project management, and contact centre services to Barwon Water and the region. Barwon Asset Solutions' profits and efficiency-generated savings are returned to Barwon Water to help it deliver its service and keep customer bills low. Barwon Asset Solutions has 126 employees (121.54 FTE).

Barwon Water's service region includes parts of the traditional lands of Wadawurrung and Eastern Maar, the Registered Aboriginal Parties and Traditional Owners, stretching from Little River and the Bellarine Peninsula in the east to Colac in the west, and from Meredith and Cressy in the north to Apollo Bay on the southwest coast. The service area incorporates local government areas of City of Greater Geelong, Borough of Queenscliff, Surf Coast Shire, Colac-Otway Shire and part of Golden Plains Shire.



Legend

- Water District
- Lakes
- Barwon Water reservoir
- Rivers
- Water channel/ pipelines
- Water treatment plant
- Groundwater production bores
- Main sewer
- Water service basin/ tank
- Water reclamation plant
- Sewer flow management facility
- Class A recycled water plant
- Class A recycled water tank
- Class A recycled water pipeline
- Special water supply catchment



Barwon Water provides world standard water and sewerage services to more than 370,000 permanent residents over 8,100 square kilometres. Over the holiday period, the serviced population can expand to more than 600,000 people.

Ninety-two per cent of our customer base is residential, with the remaining 8% a mixture of commercial, industrial, and agricultural customers. Around 30% of metered consumption is attributed to non-domestic customers. Through deep, genuine and ongoing engagement, we heard what our customers and community wanted from us in response to global challenges and developed [Strategy 2030](#) to guide how we lean in and help address these challenges in partnership with our customers and community, by leveraging the intrinsic value of our services to enhance the prosperity of our region.



OUR VALUES
 CARING | SAFE | INCLUSIVE | ACCOUNTABLE | COURAGEOUS

Operations and Supply Chains

Barwon Water is committed to operating our business lawfully and ethically, and working with suppliers that are aligned to our values, including corporate social responsibility, environmental and workplace safety protection, and staff inclusion and diversity. Barwon Water requires our suppliers to operate in accordance with all applicable modern slavery laws.

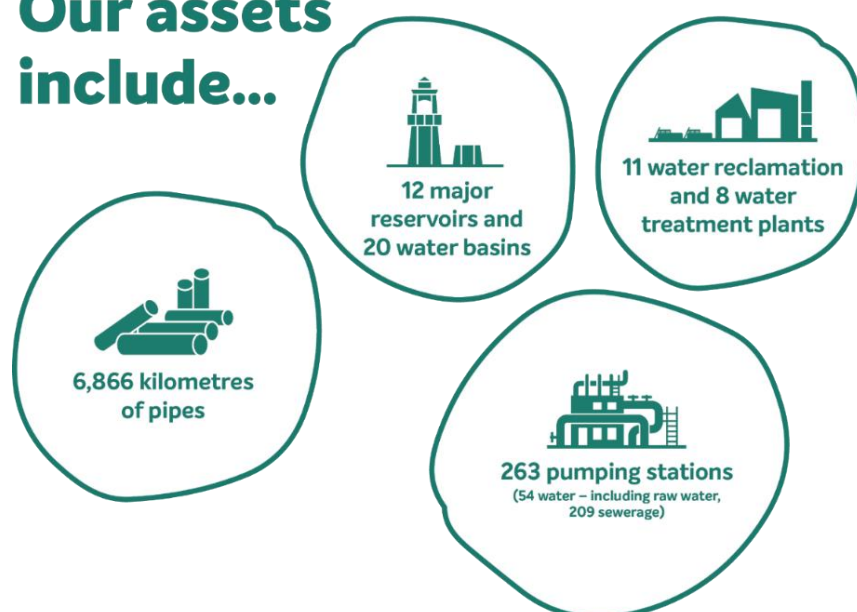
Barwon Water has two Enterprise Agreements which provide terms and conditions, including hours of work and pay, for the vast majority of its employees. The Agreements – Barwon Region Water Corporation Enterprise Agreement 2020 and Barwon Asset Solutions Enterprise Agreement 2022 – are negotiated every 3-4 years with the respective unions, are governed by the State Government’s Industrial Relations policies, and require approval from the Fair Work Commission. Agreements are made available to all employees upon commencement of employment and remain available to employees through the Barwon Water intranet and Fair Work Commission website.

The majority of our workforce comprises permanent employees. Approximately 1.3% of our workforce is casually employed (scholarship students) and approximately 3% is fixed term, primarily backfilling long term leave or specific projects. We also engage third party resources via employment agencies, for short term and project specific needs.

Our annual procurement spend is governed by the provisions of the Victorian Government Procurement Board (VGPB), and our own Procurement Policy and Procurement Governance Framework, which guides our activities to ensure that, where possible, our buying power advances social, economic and environmental objectives. We aim to ensure that our purchases represent value for money and are sourced fairly and ethically.

Barwon Water’s operations make a significant positive contribution to our region’s economy and livability. During 2023-24, the organisation had a \$299.8 million turnover supported by \$3.8 billion in assets and spent \$136 million on capital and related infrastructure works. Barwon Water’s supply chain includes the purchase of products and services needed for the businesses day-to-day operations including water and wastewater treatment chemicals, materials, external technical and professional services, office supplies, employment and training of staff, external legal advice, IT infrastructure and support services.

Our assets include...



Procurement spend

While the diversity of the goods and services we procure can potentially expose Barwon Water to risks across a number of industry sectors, 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.

The below table shows our major categories of procurement spend to support our capital projects and core operational functions.

Category	% of total procurement spend
Construction	32%
Maintenance Services (Barwon Asset Solutions, and Maintenance, Plumbing and Electrical Panels)	18%
Consultants (Technical, Engineering and ICT)	10%
Biosolids Management	7%
Developer Works	7%
Electricity	4%
Minor purchases <\$50K	4%
ICT Software, Hardware and Projects	2%
Labour Hire / Staffing Solutions	1%
Other (e.g. fleet and facilities management, chemical supply, supply and reading of water meters, laboratory services etc.)	15%

Risks of modern slavery practices

Barwon Water has formal policies in place that promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business including the Supplier Code of Conduct, Public Interest Disclosure (whistleblower) Policy and procurement complaints processes.

Barwon Water is a foundation member of the Water Industry Procurement Working Group (WIPWG), previously known as the Social Procurement Working Group, a VicWater coordinated group of Victorian water corporations, initially formed in 2017 to address social procurement, then expanded to include modern slavery risk in the supply chain.

The WIPWG undertook a risk assessment of the industry's products and services to determine where efforts should be focused. A customised heat map, aligned with ISO 20400, was developed which ranked potential modern slavery risk across the sector's operations and supply chains. The following categories were identified as representing potential human rights risks:

- **Asset maintenance:** ongoing operations and maintenance of facilities, including cleaning and security services, grass cutting, herbicide application
- **Construction:** construction labour and engineering technical services
- **Corporate:** temporary staff, labour hire and traineeship programs
- **Customer:** debt collection services, customer research services
- **Equipment and materials:** mechanical and electrical equipment, chemical products
- **ICT:** offshore IT services.

We have reviewed the heat map against our operations and have determined these categories to still be the areas for continued focus.

Monthly collaboration with Water Services Association of Australia (WSAA), Robin Mellon (CEO Better Sydney & Director UN Global Compact Network Australia) and a nationwide consortium of interested water sector members continued during 2023-24, promoted knowledge sharing of best practice across the sector. Innovative ways of working, such as using the Informed365 tool to digitise collection of supplier modern slavery data, has helped to focus our attention on suppliers, and / or supplier categories, that present actual or potential higher risk.

Actions taken to assess and address these risks

Conducting due diligence at the beginning of, and throughout, a sourcing event is a crucial part of the evaluation process, making sure suppliers and contract partners are aligned to our ethical and good practice procurement processes. Contractual clauses, tender templates, supplier evaluation tools and contract management are continually reviewed and enhanced or developed to mitigate modern slavery risk.

Specific ways risk has been addressed within each category include:

- **Asset maintenance:** Insourced via our wholly owned subsidiary, Barwon Asset Solutions, enabling direct oversight, control and enhanced stakeholder management. Additional reporting and assessment is conducted for our facilities cleaning contract, with annual modern slavery compliance statements required from our cleaning contractor.
- **Construction:** Health, Safety and Wellbeing checklists and audits embedded. Modern slavery clauses strengthened within our Technical Services Partner and Specialist Technical Services contracts.
- **Corporate:** Staffing Services State Purchase Contract (Victoria) used, ensuring prequalified suppliers used by Barwon Water are operating in accordance with the VGPB's well established and vetted supplier arrangements. Our Recruitment Policy has been designed to ensure that our hiring processes are equitable, fair, transparent and based on merit. All employees are engaged under contracts that are covered by the appropriate modern award and can choose whether they join a union.
- **Customer:** Insourcing of what is generally known as debt collection, and modifying associated customer contacts to 'Engagement and Health Check' calls.
- **Equipment and materials:** Contracts recognised as having a higher human rights risk are identified and reviewed during procurement planning sessions. Appropriate modern slavery items are inserted into tender documentation, including agreement to work with Barwon Water to improve their modern slavery position.
- **ICT:** Ensuring IT development or IT support is either insourced, or wholly sourced locally (including subcontracting) if insourcing is not possible.



How our processes address these risks

Barwon Water has a suite of policies, procedures, codes and standards, that are relevant to modern slavery and summarised in the below table.

Document name	Purpose
Code of Conduct	Outlines the expected behaviours of Victorian Public Sector Employees. The Code includes provisions relevant to fair employment and recognising and respecting the human rights of all people.
Supplier Code of Conduct	Describes the minimum expectations we have of our suppliers and their supply chains in relation to integrity, ethics and conduct; corporate governance; labour and human rights; health and safety; and environmental management.
Compliance Management Policy	Outlines Barwon Waters' commitment to meeting our legislative compliance obligations in the delivery of our products and services.
Complaints and Disputes Procedure	Recognises the importance of feedback as a mechanism for continuous improvement and sets out the principles that govern our response to complaints, concerns, or feedback.
Procurement Policy	Sets out the principles that govern the procurement of all goods and services by Barwon Water.
Purchasing Manual	Provides guidance on the practices, requirements and processes to be applied to Barwon Waters' procurement activities to ensure we achieve the principles of the Barwon Water Procurement Policy.
Public Interest Disclosures Policy	Outlines how Barwon Water meets its obligations under the Public Interest Disclosure Act 2012. The Policy provides a platform for people, including those in our supply chain, to confidently raise concerns.
Charter of Human Rights and Responsibilities	Outlines how Barwon Water will meet its obligations under the Charter of Human Rights and Responsibilities Act 2006 and provides guidance as to when and how human rights should be integrated into Barwon Waters' decision-making processes.
Tender Documentation Suite	The suite of tender documents ensure modern slavery is considered and appropriately addressed during all stages of the tender process i.e. market engagement (tender booklet), tender evaluation (evaluation template), and contractual clauses.
Employee Training	Modern slavery information is captured in our Procurement e-learn, which staff are required to complete on an annual basis. The optional Modern Slavery e-learn is also available to all staff.

Achievements in 2023-24



Implementation of Informed365 platform and inviting 256 suppliers to complete a modern slavery assessment under the WSAA consortium (149 assessments completed since January 2024).



Development of modern slavery e-Learn, with materials addressing definitions, local and global prevalence, risk factors, identification and reporting.



Modern Slavery Response Protocol developed to guide staff through the reporting process should they identify an alleged instance of modern slavery. Escalation and remedial pathways also identified.



Modern slavery presentation provided to the Board's Risk Management Committee to deepen understanding of modern slavery (incl requirements under the Modern Slavery Act), our achievements to date, and proposed actions.



Continued to embed the consideration of human rights impacts in our actions and decision-making processes, including in new and existing policy and guidance documentation (eg revision of Procurement Strategy to formalise targets for social and First Nation engagement), procedures (tender documentation suite) and standards, to align with our legislative and social obligations and risk profile.



Incorporated modern slavery response requirements into tender response booklets and associated clauses into the renewal of our Maintenance Services Panel.



Assessing effectiveness of actions

Supplier assessment platform

During 2023-24 Barwon Water has been working with technology provider Informed365, WSAA, and a national consortium of water sector members to assess and address modern slavery risks through our supply chain. This collaborative approach has allowed consortium members to assess and report on their supply chain networks more easily through a single online platform which collects, compares and collates information on suppliers, to inform year on year progress.

Suppliers are invited to register and enter information about actions they are taking to assess and address modern slavery; this data can then be accessed by consortium members to enable better evaluation, decision making and reporting. The platform is free for suppliers to register, access and use, and assessment information is updated each year following a prompt, so that improvements over time can be recorded.

Barwon Water commenced staggered supplier onboarding into Informed365 in January 2024 and has issued modern slavery assessments to 256 contracted and non-contracted high-risk suppliers, with 146 suppliers already having completed their assessment and 10 suppliers in progress. Many of these suppliers have opted to share their completed assessment with other consortium members. This approach ensures consistency across the industry, streamlines the reporting process for the suppliers involved, and reduces administrative burden.



Supplier engagement and education

The Informed365 platform enables suppliers to select consortium members they permit to view their responses, meaning less 'assessment' fatigue. Each section of the supplier assessment explains why the information is important, providing the context and background to the questions, and tries to encourage honest responses without leading respondents to preferred outcomes. In addition, suppliers gain access to the most relevant free online educational resources within every section of the platform, with resources updated multiple times per year.

Has your organisation used labour hire providers?

Yes, we have only used licensed labour hire providers

Yes, we have used both licensed and unlicensed labour hire providers

No, we have not used labour hire providers

Has your organisation or your labour hire provider recruited any employees or workers from overseas, such as temporary or casual migrant workers?

Yes

No

Not sure

Sole trader / individual (so not applicable)

Are your employees or contract workers free to lawfully resign their employment without restriction or penalty?

Yes

No

Does your organisation undertake checks to ensure all employees and workers are above the minimum age for work?

Yes

No

Image: Sample questions from 'Employment Conditions' section of the Informed365 supplier assessment.

Community of practice

By bringing water corporations together from all over Australia, the WSAA Procurement Network represents a community of practice and introduces a level of accountability to participants to contribute to the progress of initiatives, setting the participants up for a culture of continuous reflection and improvement. The group has worked together to develop and implement a collaborative, ongoing program of work with the ambition to take an industry-leading position in how it responsibly manages its operations and supply chains.

Continuous improvement

The WSAA Procurement Network has fostered a culture of continuous improvement by inviting third party specialists to support in the development of their work program, provide advice about best practice in the sector and recommend potential solutions to uplift future ways of working. By seeking external guidance and insight, the network is challenged and aided to understand where they have been effective in collectively addressing modern slavery in their industry's supply chains, and to identify opportunities to improve their approach.

The network has leaned into the support offered by an independent modern slavery expert to ensure modern slavery supplier survey questions capture the data needed to enable adequate supplier assessment. Outcomes can then be linked to resources, if needed, to ensure suppliers are able to uplift their performance.

Ongoing review of effectiveness of controls

Barwon Water recognises that the risks of adverse human rights impacts are complex and continually changing – as is our business. We will continue to prioritise inclusion of high risk, high spend and high complexity suppliers into the Informed365 platform to assist us in conducting regular modern slavery risk reviews.

Whilst Barwon Water has not identified any specific instances of modern slavery harm in our supply chain, should issues be identified, our approach will be to work collaboratively with our suppliers to address harm and mitigate exposure.



Looking forward

Having laid the foundations for a rigorous anti-slavery response over the last five years, Barwon Water remains committed to continually improving our understanding and management of modern slavery risks. Our approach to managing the risk of modern slavery will continue to evolve as we learn from our supplier assessments, refine our practices and continue to build knowledge and capacity across our business.

The actions planned for 2024-25 include:

- Develop a standalone page on the Barwon Water website dedicated to modern slavery, providing information, education and guidance to our community and supply chain.
- Consider making Modern Slavery e-Learn completion mandatory for all employees (currently completion is optional).
- Conduct a robust assessment of suppliers identified in the Informed365 platform as having 'high' modern slavery risk. Work with suppliers to better understand the issues. Seek advice from subject matter experts regarding remediation planning.
- WSAA, Informed365 and national water sector consortium members to focus on the topics of grievance mechanisms and remediation, supplier engagement and education.

Continued participation in water sector collaboration

Barwon Water will continue to work with the WIPWG and the WSAA network in order to seek continuous improvement and shared learnings on how to identify, address and reduce modern slavery risks within our supply chains and operations.





Appendix 1

This Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below identifies where each criterion is disclosed within the different sections of the statement.

Mandatory Criteria	Reference in this statement
Identify the reporting entity.	About the Barwon Water Group (p4-6)
Describe the reporting entity's structure, operations and supply chains.	About the Barwon Water Group (p4) Barwon Water's service region (p5) Operations and supply chains (p7) Procurement spend (p8)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of modern slavery practices (p8-9)
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Actions taken to assess and address these risks (p9) Processes to assess and address these risks (p10) Achievements in 2023-24 (p11)
Describe how the reporting entity assesses the effectiveness of these actions.	Assessing the effectiveness of these actions (p12-13)
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	Consultation with any entities the reporting entity owns or controls (p16)
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Looking forward (p14)

Consultation with any entities the reporting entity owns or controls

Consultation with various internal and external stakeholders has taken place to help us build our modern slavery capabilities and develop this statement, including:

- ongoing collaboration with other water corporations through participation in the Victorian and national water industry working groups.
- external third-party consultants and experts for their knowledge, insights and thought leadership.
- ongoing communication with internal business areas e.g. Governance, Procurement.

During the reporting period this statement covers, Barwon Asset Solutions was actively engaged and consulted with. We discussed details of the Modern Slavery Act 2018's reporting requirements, the actions we intend to take to address these requirements and provided them with relevant materials and updates.

Our Executive team has been involved in the review and endorsement of this statement for approval by the Board.

Further information



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f t y o i n

Korweinguboora Reservoir