



**2021/22  
MODERN SLAVERY  
STATEMENT**

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The Central SEQ Distributor-Retailer Authority, trading as Urban Utilities (ABN 86 673 835 011), is a statutory authority under the South-East Queensland Water (*Distribution and Retail Restructuring Act*) 2009 (Qld). With a total revenue of \$1,446.9M, we are a reporting entity for the purposes of the Act.

This Statement sets out the actions taken by Urban Utilities to address modern slavery risks in its operations and supply chains over the financial year ending 30 June 2022 (FY22), pursuant to the *Modern Slavery Act 2018* (Cth) (the Act).

All amounts expressed in this Statement are in Australian dollars.



We acknowledge the Traditional Owners and Custodians of the land and waterways on which we work and live, and pay respects to the Elders past, present and emerging. We recognise and value their traditional responsibility for the land and water and the contribution of Aboriginal and Torres Strait Islander Peoples to the South East Queensland community.

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# I. INTRODUCTION

This is Urban Utilities' third Statement under the Australian Government's *Modern Slavery Act 2018* (the Act), and it describes our approach and continued efforts to manage modern slavery risks in our operations and supply chains throughout FY22.

Urban Utilities remains committed to collaboration, consultation and meaningful engagement with government and our industry peers to share knowledge, discuss good practice approaches, and build on learnings to address the increasing complexity of modern slavery risk. This includes our involvement in the development of the Queensland Government modern slavery framework, our continued participation in the Modern Slavery Community of Practice for Queensland-based government entities, and, most recently, participating in the newly formed Water Services Association of Australia Community of Practice.

We are 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. This Modern Slavery Statement reflects our purpose, vision and core values – to enrich quality of life by caring for each other and the community.

## I.1 OUR STRATEGIC DIRECTION

Our strategic direction outlines where we want to be and how we plan to get there.

### OUR PURPOSE ENRICH QUALITY OF LIFE.

#### OUR VISION

**WE PLAY A VALUED ROLE IN ENRICHING THE LIVEABILITY OF OUR COMMUNITIES.**

#### OUR VALUES

Our values support our purpose, vision and the development of a constructive culture for Urban Utilities. They provide guidelines for employees on what behaviour is expected and how decisions should be made.

#### WE CARE

**WE'RE CONNECTED** – We're here for each other and our customers. We generously share our talent, time and knowledge.

**WE'RE ALL IN** – We're one team. We've got grit, can always be counted on and love what we do.

**WE KEEP IT RREAL** – We're good humans. We embrace real and meaningful conversations. We bring our whole self to work.

**WE'RE EVOLVING** – We're curious, we challenge the status quo to create change that adds value.

#### OUR STRATEGIC GOALS

Our strategic goals are our "big picture" objectives for the business. They drive our priority setting, resource allocation, capability requirements and budgeting activities.

**CONSTRUCTIVE CULTURE** – We inspire, create and sustain a constructive culture to deliver high performance.

**FOUNDATIONAL SUCCESS** – We know our business, we know our customers and we deliver value for both.

**ENVIRONMENTAL LEADERSHIP** – We protect and enhance our environment for current and future generations through excellence in water cycle management.

**SOCIAL & ECONOMIC VALUE** – We advance the wellbeing and prosperity of society by leveraging our unique capabilities.

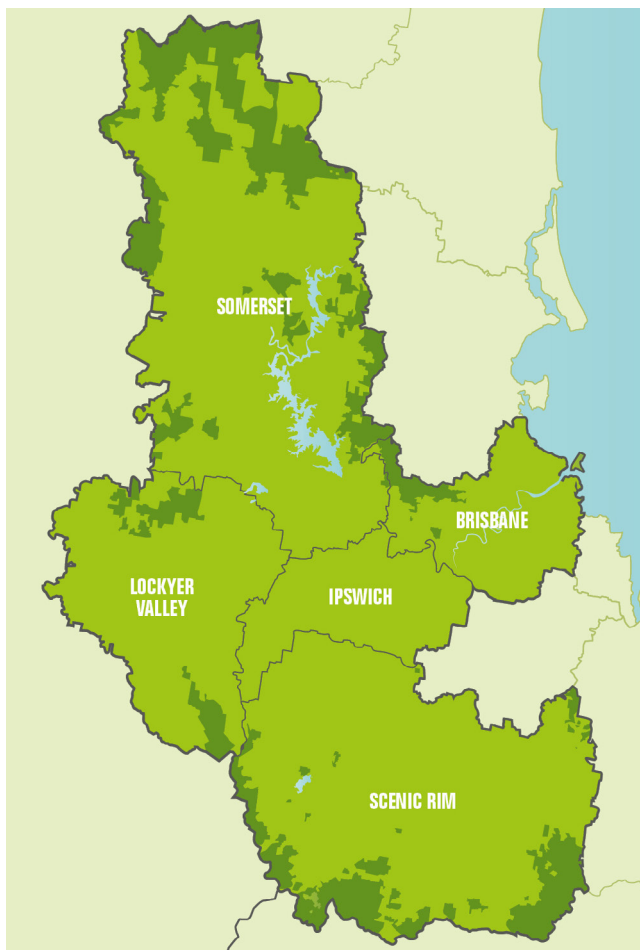
## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 2.1 OUR STRUCTURE

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

With our head office in Fortitude Valley, Queensland, Australia, Urban Utilities is led by a Board which is comprised of eight independent, non-executive members, including the Chair, who are responsible for setting and overseeing Urban Utilities' strategic direction.

The Board is supported by the Chief Executive Officer and eight executive leaders who are responsible for leading their functional business divisions. The Board's role includes deciding the strategies and the operational, administrative and financial policies to be followed. The Board also ensures that we perform our functions and exercise our powers in a proper, effective and efficient manner, and that we comply with planning and reporting requirements.



Our geographic area stretches from Cape Moreton in the east to the outskirts of Toowoomba in the west, up to the Yabba State Forest in the north, and down to the New South Wales border along the Scenic Rim in the south, covering 14,384 square kilometres.

**THIS AREA IS MADE UP OF THE FIVE LOCAL GOVERNMENT AREAS OF OUR SHAREHOLDERS: BRISBANE, IPSWICH, LOCKYER VALLEY, SCENIC RIM AND SOMERSET.**

## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 2.2 OUR OPERATIONS

We are one of the largest water distributor-retailers in Australia, responsible for supplying drinking water, recycled water and wastewater services to 633,000 residential properties and 31,100 commercial properties in South East Queensland. We operate in a unique environment where we serve the same customers and communities as our shareholders.

We deliver these services via our \$6.6 billion infrastructure network, which is supported by a workforce of 1,055 permanent employees.

To enable our core services, we undertake a number of related functions, including:

- future services planning,
- asset planning and management,
- water meter management and billing,
- development assessments and approvals,
- waste management (including trade waste), and
- research and development.

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

For full details, please refer to [Urban Utilities' Annual Report FY22](#).

#### OUR BUSINESS IN NUMBERS

**1.6 MILLION CUSTOMERS**

**129,103 ML OF DRINKING WATER SUPPLIED**

**158,037 ML OF WASTEWATER COLLECTED,  
TRANSPORTED AND TREATED**

**3,257 ML OF RECYCLED WATER SUPPLIED**

**\$319.6 MILLION INVESTED IN INFRASTRUCTURE**

**\$6.6 BILLION ASSET BASE**

**\$239 MILLION TOTAL RETURN TO SHAREHOLDERS**

**\$230,000+ INVESTED IN COMMUNITY EVENTS  
AND SPONSORSHIPS**

**9,646 KM OF WATER MAINS**

**9,913 KM OF WASTEWATER MAINS**

**30 WASTEWATER TREATMENT PLANTS**

**2.2 MILLION WATER METER READINGS**

**114,000+ DRINKING WATER QUALITY TESTS**

**3,024 WATER APPROVAL APPLICATIONS PROCESSED**

**14,051 MWH GENERATED FROM WASTE**

**100% OF CUSTOMER SERVICE STANDARDS ACHIEVED**






## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 2.3 OUR SUPPLY CHAINS

Urban Utilities recognises that there are modern slavery risks across the goods and services we purchase and is committed to continually monitoring our supply chains to identify and address risks in an appropriate manner.

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

**TABLE I: OUR KEY CATEGORIES OF PROCUREMENT SPEND**

| CATEGORY  | INCLUDES BUT NOT LIMITED TO:  | % OF TOTAL PROCUREMENT SPEND |
|---|---|------------------------------|
| <br><b>INFRASTRUCTURE AND CONSTRUCTION</b> | Capital infrastructure projects   | 35%                          |
| <br><b>MAINTENANCE AND OPERATIONS</b>    | Costs to operate and maintain infrastructure and includes maintenance services; meters, associated services and equipment; fleet; chemicals; energy; traffic management services; pipes, accessories and consumables; plant and equipment hire. | 31%                          |
| <br><b>CORPORATE SERVICES</b>            | Professional services; facilities and site management; contingent labour; marketing and media; logistics; freight; postage; financial services; learning and development; catering; uniforms; stationery; travel; insurance.                    | 17%                          |
| <br><b>INFORMATION TECHNOLOGY</b>        | Computer hardware and accessories; software and licensing (including as a service); managed services.   | 14%                          |
| <br><b>WASTE SERVICES</b>                | Waste management services   | 3%                           |

While the diversity of the goods and services we procure can potentially expose Urban Utilities to multiple 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.

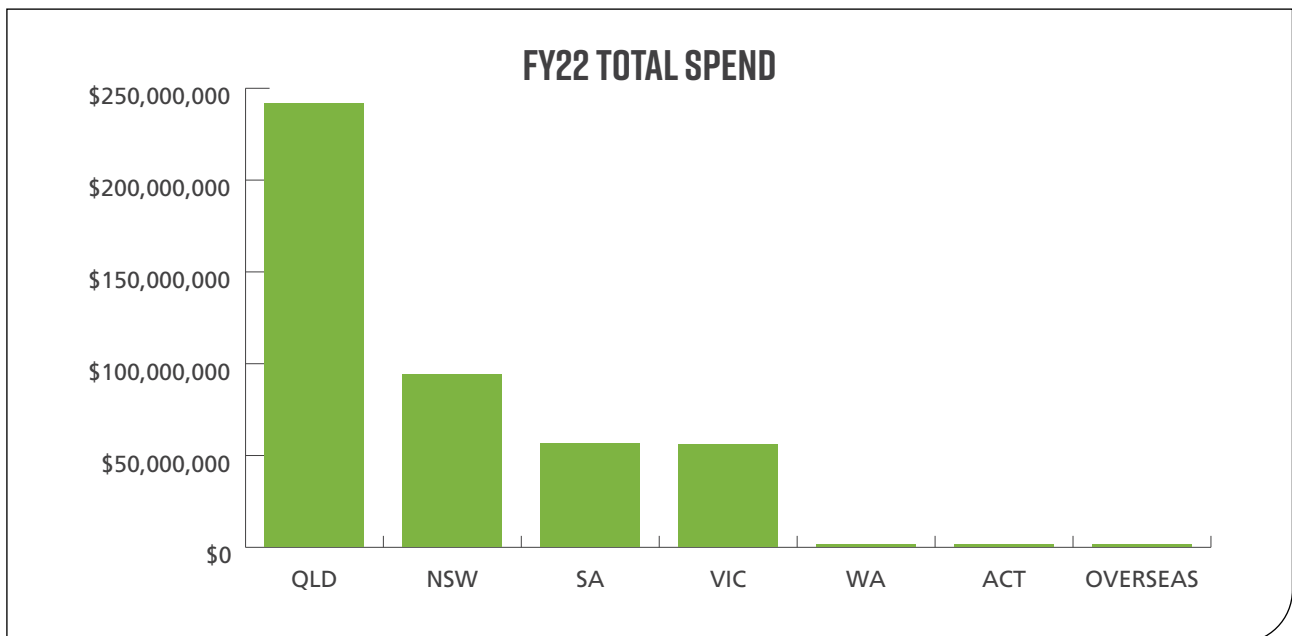
## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS



**APPROXIMATELY 99.7% OF OUR FY22 SUPPLIER SPEND WAS WITH TIER ONE/DIRECT SUPPLIERS LOCATED IN AUSTRALIA.**

Urban Utilities maintained a supply base of 798 suppliers during the reporting period. We are committed to procuring goods from local suppliers and, as evidenced by the graph below, approximately 99.7% of our \$449M<sup>1</sup> FY22 supplier spend was with tier one/direct suppliers located in Australia.

**FIGURE I: OUR FY22 SPEND AT A GLANCE**



1. Addressable spend includes capital and operating expenditure, and excludes spend such as government and regulatory fees, land acquisition, employee payments and reimbursements, and purchase of bulk water.



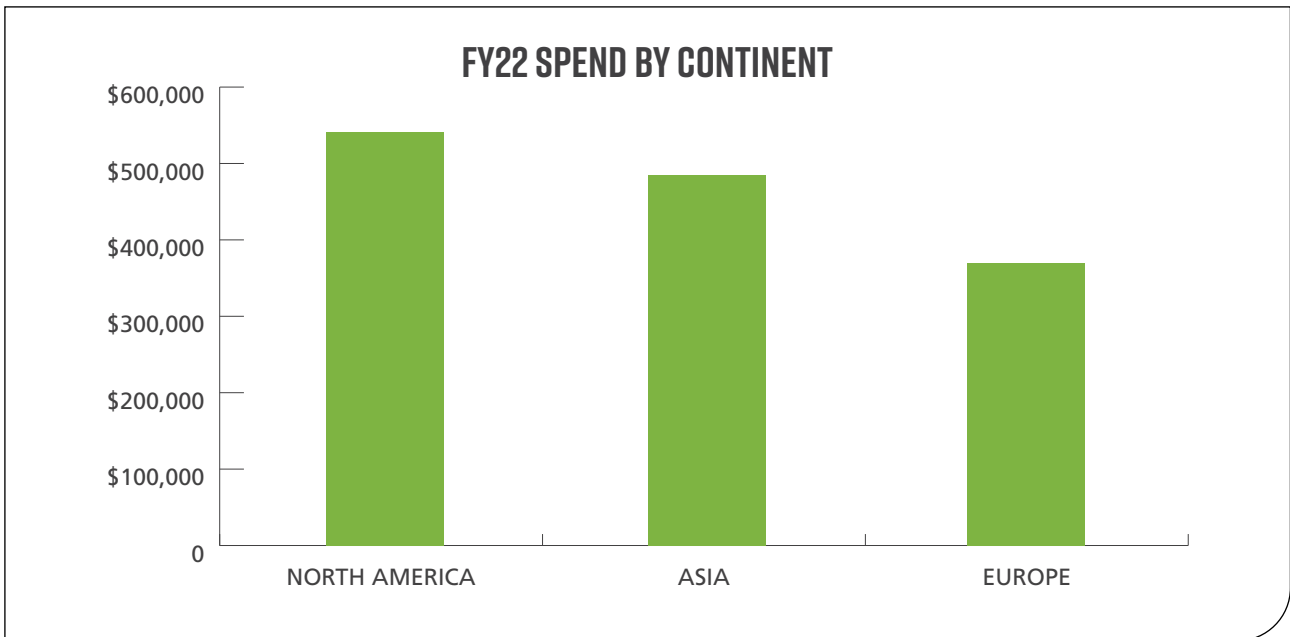
## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

The remaining 0.3% is attributed to a total of 27 overseas suppliers located across eight countries as detailed below:

|                      |   |
|----------------------|---|
| <b>North America</b> | IT software licenses and support from the United States; and IT software licenses and support, and specialty laboratory consumables from Canada;                  |
| <b>Asia</b>          | IT software licenses and support from Israel, and professional subscriptions from Singapore; and  |
| <b>Europe</b>        | IT software licenses and support from the United Kingdom, Ireland, Switzerland and the Netherlands, along with a professional membership from the United Kingdom. |

Figure 2 shows the distribution of our overseas spend per continent.

**FIGURE 2: FY22 OVERSEAS SPEND AT A GLANCE**



The goods and services we purchased from overseas suppliers have been assessed as low risk in terms of the inherent risk of modern slavery, based on the nature of the goods or services purchased and their country of origin.

# 3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

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## 3.1 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 protects human rights.

We have a robust corporate governance framework in place, which is overseen by Urban Utilities' Board and the Audit, Finance and Risk Committee. Our Risk Management Policy and Risk Management Procedure establish a comprehensive management and assessment framework for risk within Urban Utilities. Underpinning this framework is a suite of policies, procedures, codes and standards, several of which are relevant to modern slavery.

Our Chief Financial Officer is the accountable officer for addressing modern slavery risks, supported by General Counsel, Chief Experience Officer, Executive Leader Corporate Affairs, Head of Procurement and Supply, and other members of the executive and management teams.

Our Modern Slavery Working Group includes representatives from the Procurement and Supply, Legal and Risk, Corporate Affairs and Experience teams. A Modern Slavery Working Group Charter was developed and implemented during the reporting period. The Charter formally establishes the purpose of the working group, which is to assist the Board and the executive team in ensuring, through cross-functional business representation, that Urban Utilities understands, identifies and mitigates modern slavery and human rights risks that may exist within our operations and supply chains. The Modern Slavery Working Group meets quarterly and is responsible for:

- a) developing and recommending the annual Modern Slavery Action Plan;
- b) ensuring there is an appropriate platform in place to plan, assign and assess activities and accountabilities for modern slavery and human rights risk management;
- c) preparing and recommending metrics to assess the effectiveness of our modern slavery program of work;
- d) providing advice on modern slavery and human rights issues and risks;
- e) contributing to the preparation of our annual Modern Slavery Statement;
- f) identifying and recommending opportunities to collaborate with industry groups to share knowledge and learnings and keep abreast of common approaches across industry; and
- g) monitoring emerging issues, trends and risks relating to our operations and supply chains.

The day-to-day implementation and management of the Modern Slavery Action Plan is cross-functional and our internal business units work together to embed the initiatives outlined in the plan. Specifically:

- the Procurement and Supply team manages all procurement processes, including supplier due diligence, contract execution and management;
- our Legal and Risk team provides advice and guidance on legislative compliance and incident management;
- the Corporate Affairs team manages independent assurance; and
- the Experience team manages the recruitment of employees and contingent labour staff.

## 3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Urban Utilities' Modern Slavery Risk Assessment Tool is one of our key controls to managing potential or actual risks of modern slavery in our operations and supply chains. It provides Urban Utilities with an ongoing framework from which to assess the risk of modern slavery practices in our operations and supply chains by considering geographic risk, industry/sector risk and product/service risk.

In addition to our risk assessment process, our Procurement and Supply team regularly reviews media stories and collaborates with industry groups to keep abreast of emerging human rights issues and risks. We anticipate, and are watching for, increased human rights risks related to products in our supply chains, including any emerging risks from the ongoing COVID-19 pandemic.

### 3.2 OUR OPERATIONS

During the reporting period, labour arrangements data for Urban Utilities included the following:

- a) 1,140 people were employed or engaged by Urban Utilities in some capacity. Note that this figure does not include the workforce of our key supply partners.
- b) Of this figure, 1,055 were employees (92.5%) directly engaged by Urban Utilities in a permanent (full-time or part-time) capacity.
- c) The remaining 7.5% of our workforce was contingent labour engaged through recruitment agencies.
- d) Of our contingent labour engagements, most contractors were engaged to support digital information services and operations and service delivery functions. Contingent labour resources are engaged through formal, documented arrangements with contingent labour providers holding a requisite license under the *Labour Hire Licensing Act 2017* (Qld).

Urban Utilities' recruitment processes incorporate verification and due diligence checks to ensure that employees have a "Right to Work" in Australia, and 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 contracted provider, in which recruitment agencies are required to provide evidence of compliance (that is, copies of passports, visa and VEVO checks). Further, employees are engaged under various Fair Work Commission-approved industrial agreements and Common Law Contracts.

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

- a) Urban Utilities has oversight and visibility of the people engaged;
- b) Urban Utilities has transparency over the rates paid to our contingent workforce; and
- c) recruitment agencies are required to comply with legislative requirements, including modern slavery laws.

We assess inherent modern slavery risk factors (that is, geographic risk and industry/sector risk) in Urban Utilities' operations on an annual basis and Urban Utilities' controls for managing such risks. As with the inherent risk assessment, each control is given a score and allocated a weighting, resulting in a weighted score. The controls are reviewed annually and updated to reflect changes Urban Utilities has made to its modern slavery controls as they pertain to our operations. The outcome of this year's assessment was that the residual risk of modern slavery in our operations remains "low", and it is anticipated that unless there is a substantial shift in our operations, specifically in our labour arrangements, it is likely to remain low risk moving forward.

## 3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

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### 3.3 COVID-19 IMPACTS ON OUR OPERATIONS

During the COVID-19 pandemic, Urban Utilities has maintained a focus on delivering water and wastewater services to our commercial and residential customers in the most cost-effective and efficient manner possible.

Through the various stages of the pandemic, controls have been implemented to protect Urban Utilities' employees to ensure they could continue to maintain the essential services we provide to our communities. Urban Utilities implemented flexible working arrangements and increased protections around critical employees to limit impacts if our employees contracted COVID-19. This has allowed us to continue to deliver services to our customers with minimal COVID-19-related disruptions. These arrangements remain in place as part of our new ways of working to ensure the health and wellbeing of our employees going forward.

To help ease the financial burden on our customers, rate increases for water and wastewater charges were not passed on to customers during the applicable billing periods, and we continued to offer our UrbanAssist program, which, to date, has provided over \$10 million in financial relief to customers impacted by COVID-19.

### 3.4 OUR SUPPLY CHAINS

Urban Utilities procures goods and services in accordance with our corporate policies, processes and frameworks. These policies and processes are applicable to all employees involved in purchasing goods and services on behalf of Urban Utilities. They set out how we plan, source and manage our supply agreements and supplier relationships throughout the procurement lifecycle.

Our procurement objective is to maximise the benefits and value delivered through the procurement of goods and services for Urban Utilities, its stakeholders, customers and the wider community. Urban Utilities' procurement principles include a focus on legal compliance and corporate social responsibility, specifically endeavouring to advance economic, environmental and social objectives. Best practice regarding compliance with modern slavery obligations and principles has been embedded within the broader procurement policy and processes and legal compliance frameworks.

To ensure that we continue to build on our understanding of modern slavery risks within our supply chains, we have continued to conduct risk assessments of our existing tier one suppliers and all new suppliers engaged as a result of a procurement activity. High-level desktop assessments are initially completed using a variety of information sources, including the *Global Slavery Index*; *Commonwealth of Australia, Hidden in Plain Sight, Final Report of the Inquiry into Establishing a Modern Slavery Act in Australia*; and *US Department of Labour's 2018 List of Goods Produced by Child Labour or Forced Labour*, to determine the inherent risk of modern slavery based on country risk, industry/sector and products/services risks.

# 3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

**TABLE 2:** THIS TABLE DEPICTS THE CATEGORIES OF PRODUCTS AND SERVICES THAT WE PROCURE WHICH WE HAVE ASSESSED AS A POTENTIAL HIGHER RISK OF MODERN SLAVERY

| PRODUCT/SERVICE CATEGORY                      | PRODUCT AND SERVICE                                      | RISK OF MODERN SLAVERY   |
|---|--|--|
| <b>IT RELATED SUPPLIES</b>                    | Computer hardware and electronics                        | <p>Tier one suppliers are headquartered in Australia.</p> <p>However, this industry is recognised globally as a medium-high risk sector of modern slavery as raw materials and the manufacture of hardware, consumables and electronics may take place in locations with minimal regulation and oversight, where workers have limited resources for resolving grievances.</p>        |
| <b>OPERATIONAL SERVICES</b>                   | Cleaning Services, Security Services and Traffic Control | <p>Tier one suppliers are headquartered in Australia.</p> <p>Given the nature of work in this sector, there are inherent risks of worker vulnerability and labour exploitation, due to low-skilled, low-paid manual work and the high prevalence of short-term, seasonal and migrant workers and subcontractors.</p>   |
| <b>UNIFORMS</b>                               | Clothing and Personal Protective Equipment (PPE)         | <p>Tier one suppliers are headquartered in Australia.</p> <p>Tier two suppliers may be medium-risk depending on country of manufacture. Suppliers of these products in countries of the Asia-Pacific region may be at risk of child labour, forced labour, bonded labour and migrant labour exploitation in the preparation of raw materials and the manufacture of the apparel.</p> |
| <b>PROMOTIONAL PRODUCTS AND MERCHANDISING</b> | Branded promotional and merchandising products           | <p>Tier one suppliers are headquartered in Australia.</p> <p>Tier two suppliers may be medium-risk depending on country of manufacture. Suppliers of these products in countries of the Asia-Pacific region may be at risk of forced labour, bonded labour, migrant labour exploitation and require further investigation.</p>   |

## 3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

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Urban Utilities will continue to expand our understanding of modern slavery risks within our supply chains by continuing to conduct risk assessments of our existing suppliers and new suppliers engaged as a result of future procurement activities. This includes continuing to reissue our Modern Slavery Supplier Questionnaire every two years to our active suppliers so that we can reassess the inherent risk of modern slavery in their operations and the controls they have in place to identify, manage and mitigate such risks. We will also work with suppliers that we consider to have insufficient controls through our contract management and supplier relationship management frameworks, to better understand the risk level and, where necessary, develop a plan for remediation.

Supply chain transparency is key to this process and we recognise that risks may also occur in our tier two supply chain and beyond. We continue to monitor high-risk categories as part of our supplier engagement process and contract management framework.

We also continue to articulate our modern slavery obligations and expectations to suppliers through our [Supplier Code of Conduct](#), which forms part of our tendering compliance process and contractual terms that are reflective of the modern slavery risks posed by the supplier, industry and/or goods and services being procured.

### 3.5 COVID-19 IMPACTS ON OUR SUPPLY CHAINS

Urban Utilities recognises that COVID-19 may increase modern slavery risks in parts of its supply chain due to the need to engage alternative suppliers through fast-track procurement processes from time to time. We are committed to managing the risks associated with our purchasing decisions and balance this with enhancing the resiliency and efficiency of supply chains. We have maintained a strong focus on effective supplier governance and continue to expand our understanding of the modern slavery risks in our supply chains by assessing modern slavery risks of newly onboarded suppliers and working collaboratively with any new suppliers with inherent modern slavery risks.

We recognise that circumstances like COVID-19 can exacerbate pressures on suppliers and manufacturers to produce and deliver large quantities of goods (such as PPE) in short timeframes, increasing the vulnerability of workers in supply chains to labour exploitation modern slavery. We have taken care to, where possible, engage primary and secondary suppliers, including the use of local suppliers, so orders for high-usage items can be placed with multiple suppliers to avoid creating unreasonable supply and delivery timeframe pressures on suppliers. We continue to consider the ongoing impacts of COVID-19 on global supply chains, particularly as they relate to our procurement. We have continued to procure goods and services with minimal delays and disruptions, predominately through our existing low-risk local suppliers, who have largely remained resilient.

## 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

Urban Utilities seeks to proactively assess and address modern slavery risks in our operations and supply chains. Consistent with the *United Nations Guiding Principles on Business and Human Rights (UNGPR)*, we continue to assess our potential to:

- cause modern slavery or human rights impacts through our operations and supply chains;
- contribute to modern slavery or human rights impacts through our operations and supply chains; or
- be directly linked to modern slavery or human rights impacts through our operations, or products and services procured from our suppliers.

**Our key controls to manage risks of modern slavery in our operation and supply chains are based on five key foundations:**

1. Policies and procedures;
2. Risk assessment and due diligence;
3. Training and awareness;
4. Grievance and remediation; and
5. Collaboration and stakeholder engagement.

THE FOLLOWING SECTIONS OUTLINE OUR GOVERNANCE FRAMEWORK AND EXPLAIN OUR WORK ACROSS EACH OF THESE FIVE FOUNDATION AREAS.

### 1 POLICIES AND PROCEDURES

We have a suite of policies and procedures to support our modern slavery response, including our Fraud, Corruption and Whistleblower Policy; Public Interest Disclosure Program Procedure; Procurement Policy and related procedures; Assessing Compatibility with Human Rights Procedure; and Supplier Code of Conduct.

### 2 RISK ASSESSMENT AND DUE DILIGENCE

Urban Utilities takes a proactive approach to identifying and addressing modern slavery risk in our operations and supply chains. Our risk-based approach and due diligence processes enable us to identify, mitigate and account for how we address modern slavery risk in our supply chains.

### 3 TRAINING AND AWARENESS

Training and awareness are key controls in addressing the risk of modern slavery. We have implemented online training which is targeted at employees in key roles. This training is completed every two years and we monitor and report on the completion of this module.

### 4 GRIEVANCE AND REMEDIATION

We are committed to respecting human rights across our business and supply chains. Our Urban Disclosure Program provides a mechanism where employees and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery.

### 5 COLLABORATION AND STAKEHOLDER ENGAGEMENT

Collaboration and engagement with our suppliers, business partners, and industry to effect change is a key feature of our strategy to combat modern slavery. Our stakeholder engagement and participation in various industry forums provides opportunities for shared learnings and valuable insights to inform our response to modern slavery and broader human rights issues.

# 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

## 4.1 POLICIES AND PROCEDURES

Our Risk Management Policy and Risk Management Procedure establish a comprehensive management and assessment framework for risk within Urban Utilities. Underpinning this framework is a suite of policies, procedures, codes and standards, several of which are relevant to modern slavery.

| POLICIES AND PROCEDURES WITH RELEVANCE TO MANAGEMENT OF MODERN SLAVERY AND HUMAN TRAFFICKING |   |
|--|---|
| DOCUMENT NAME  | PURPOSE   |
| <b>Code of Conduct</b>   | Outlines the expected behaviours of our employees, Board members, and contractors. The Code includes provisions relevant to fair employment and recognising and respecting the human rights of all people.  |
| <b>Corporate Compliance Policy</b>   | Outlines Urban Utilities' commitment to meeting our legislative compliance obligations in the delivery of our products and services.  |
| <b>Complaints Management Policy</b>  | Outlines our approach to managing and responding to complaints and feedback received from customers and members of the public. Processes supporting this policy categorise complaints of a human rights nature as a high priority.  |
| <b>Fraud, Corruption and Whistleblower Policy</b>  | Establishes Urban Utilities' commitment to preventing and detecting fraud and corrupt conduct, including the commitment to protect whistleblowers under the UrbanDisclosure Program.  |
| <b>Procurement Policy</b>  | Sets out the principles that govern the procurement of all goods and services by Urban Utilities.   |
| <b>Public Interest Disclosure Program Procedure (incorporating UrbanDisclosure Program)</b>  | Outlines how Urban Utilities meets its obligations under the <i>Public Interest Disclosure Act 2010</i> (Qld). It includes information regarding the operation of Urban Utilities' UrbanDisclosure Program, including how to make a disclosure, the assessment and investigation of the disclosure, confidentiality and privacy provisions. |
| <b>Assessing Compatibility with Human Rights Procedure</b>                                   | Outlines how Urban Utilities will meet its obligations under the <i>Human Rights Act 2019</i> (Qld) and provides guidance as to when and how human rights should be integrated into Urban Utilities' decision-making processes.   |
| <b>Procurement Procedure</b>   | Provides guidance on the practices, requirements and processes to be applied to Urban Utilities' procurement activities to ensure we achieve the principles of Urban Utilities' Procurement Policy.   |
| <b>Supplier Code of Conduct</b>  | Sets out Urban Utilities' expectations of our suppliers and their supply chains in relation to corporate governance and ethics, health and safety, environmental protection, and human rights and labour practices.   |



# 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

## 4.2 RISK ASSESSMENT AND DUE DILIGENCE

Due diligence underpins our management of modern slavery risks and assists us in the identification, prevention and mitigation of modern slavery risks and potential exposure to human rights violations more broadly.

### RISK ASSESSMENT TOOL

Our Modern Slavery Risk Assessment Tool is 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 consider the potential for us to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

**We utilise our Modern Slavery Risk Assessment Tool to identify potential high-risk suppliers through the assessment of the following factors:**

|   |  |
|---|--|
| <b><i>Geographic risk by reference to the Global Slavery Index 2018</i></b> | Some countries have a higher prevalence of modern slavery, which is often associated with poor governance, weak rule of law, conflict, migration flows and socioeconomic factors, such as poverty. |
| <b><i>Industry/sector risk</i></b>  | Particular industries and sectors may have higher modern slavery risks due to the prevalence of undeclared labour, illegal labour and risk of human trafficking.                                   |
| <b><i>Product or service risk</i></b>                                       | Certain goods and services may have high modern slavery risks because of the way they are produced, provided or used.  |

The tool empowers us to expand the risk assessment of our tier one suppliers each year. It also encourages us to procure more consciously in the future, to further understand and eliminate the modern slavery risks in our supply chains, thus maturing our understanding of our supply base.

### SUPPLIER DUE DILIGENCE

Our Procurement and Supply team conducts a range of supplier due diligence assessments at various stages of our procurement lifecycle.

- Supplier onboarding**  
 Suppliers are required to complete self-assessment modern slavery questions on modern slavery risks within their operations or supply chains as part of the Invitation to Offer or Request for Quote process. The information gathered through these processes is aligned with the information required 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 Procurement and Supply team via our contract management and supplier relationship management frameworks.
- Desktop supplier assessments**  
 A high-level assessment of the inherent risks of modern slavery (that is geographic risk, industry/sector, and product or service risk) is completed for each new supplier via a desktop review, where the supplier hasn't been engaged via a formal procurement process. Where an inherent risk of modern slavery is identified based on these indices, the supplier is required to complete the Modern Slavery Supplier Questionnaire.

## 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

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- **Modern Slavery Supplier Questionnaire**

Our supplier questionnaire, which was launched in FY20, forms an important component of our process to identify and assess risks with our higher-risk tier one suppliers. The questionnaire has 15 questions to assist suppliers in identifying modern slavery risks in their operations and their supply chains. The information gathered from questionnaire responses is then analysed using the Modern Slavery Risk Assessment Tool to determine whether:

- the supplier has risks of modern slavery;
- the supplier has sufficient controls in place to manage any risks; and
- further due diligence/risk management activities via contract management or supplier relationship management frameworks is required.

- **Queensland Government's Ethical Supplier Threshold**

As part of our procurement due diligence process, we assess whether suppliers comply with the criteria set out in the Queensland Government's Ethical Supplier Threshold. The Threshold outlines the wage and entitlement standards expected of suppliers who wish to conduct business with Queensland Government agencies, government-owned corporations, statutory authorities and special purpose vehicles. Ongoing compliance with the Ethical Supplier Threshold also forms part of our standard contract terms and conditions.

- **Supplier Code of Conduct (Supplier Code)**

Urban Utilities' Supplier Code outlines our commitment to doing business with ethically, environmentally and socially responsible suppliers and is aligned with our strategic goals and objectives. The Supplier Code clearly communicates what we expect of our suppliers and their supply chains in supplying goods and services to us. New and existing suppliers are required to demonstrate their commitment to and compliance with the standards and expectations outlined in the Supplier Code by acknowledging that they have read and accept the obligations of the Code via the execution of a formal letter of commitment. Our Supplier Code is a key component of our overall approach to responsible procurement.

- **Contract terms and conditions**

Our standard Purchase Order terms and conditions include a specific modern slavery clause to which suppliers must comply. Suppliers are required to notify us immediately of any suspected or actual modern slavery offence committed in their operations or supply chains. In the event of an actual or suspected modern slavery offence and without limiting any other available right or remedy, Urban Utilities may suspend or terminate the contract. Further, when executing contractual agreements with successful suppliers following a formal procurement process, we consider the modern slavery risks of the goods or services we are procuring and apply the appropriate modern slavery clause commensurate with the potential or actual risk identified. Our Modern Slavery Clause Bank assists with determining the appropriate clause to be enacted based on the risk level.

## CASE STUDY

### DUE DILIGENCE IN ACTION: SELECTION OF MERCHANDISING AND PROMOTIONAL PRODUCTS SUPPLIERS

During the reporting period, face-to-face engagement activities and events with Urban Utilities' communities recommenced after a two-year hiatus due to COVID-19 restrictions. New branded merchandising and promotional products were required for these events.

Having undertaken the internal modern slavery training, our Community Engagement and Education team gave consideration of the modern slavery risks identified in previous purchases and applied this lens to the purchase of these future products. This included the understanding that modern slavery risks and poor working conditions was an important factor when selecting a supplier. The team proactively contacted the Procurement and Supply team for support and guidance on selecting ethical suppliers.

In conjunction with the Community Engagement and Education team, the Procurement and Supply team contacted a number of Australian-based suppliers and sought the completion of our Modern Slavery Supplier Questionnaire as part of the procurement process.

The desktop review of the completed Questionnaires was undertaken by representatives from the Procurement and Supply team and included assessing the risks of the tier one suppliers, specifically to gain an understanding of where the products are manufactured to evaluate potential human rights and modern slavery risks.

The assessment included:

- the inherent risk of modern slavery based on country where the products are manufactured;
- types of employment relationships in place;
- the supplier's controls to identify and manage modern slavery risks including:
  - policies and processes in place that articulate expected standards in relation to employment and labour, and procurement related policies, standards and commitments;
  - risk management frameworks which facilitates the identification of current and emerging modern slavery risks;
  - due diligence checks when onboarding new suppliers;
  - whether modern slavery clauses are included in contractual terms and conditions;
  - employee and supplier training and awareness programs;
  - access to a grievance mechanism;
  - remedial steps if a modern slavery related breach is identified;
  - whether audits are conducted of their supply chains.
- cross-checking for any negative media articles on the tier one suppliers in the media monitoring undertaken and provided by our third-party media monitoring provider, across categories that include human rights violations, corruption, legal breaches and allegations of misconduct.

The information obtained through this process enabled us to better understand the potential suppliers' operations, including their supply chains, and identify whether there are any modern slavery and broader labour rights risks. Ultimately, we selected three suppliers to provide a range of merchandising and promotional products, with the Community Engagement and Education team having the assurance that the due diligence undertaken on the suppliers and their supply chains has reduced the risk of modern slavery or abuse of human rights occurring.

During the next reporting period, Urban Utilities will consider establishing a Preferred Supplier Arrangement for the supply of branded merchandising and promotional products, with suppliers being prequalified based on a number of criteria, which will include consideration of modern slavery and human rights risks.

## 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

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**AS AT 30 JUNE 2022, 445 EMPLOYEES HAD COMPLETED THE MODERN SLAVERY AWARENESS TRAINING, WHICH INCLUDES KNOWLEDGE CHECKS.**

### 4.3 TRAINING AND AWARENESS

Our employees are key to identifying and addressing the risks of modern slavery and our training aims to provide our people with a general awareness and understanding of modern slavery and modern slavery risks in Urban Utilities' business and supply chains.

During the reporting period, we refreshed our online Modern Slavery Awareness Training, taking into consideration feedback provided by employees via our training effectiveness survey and aligning our training content with the Australian Government's *Modern Slavery in Public Procurement* e-Learning module.

The refreshed online training provides an overview of:

- what constitutes modern slavery;
- modern slavery in procurement;
- the objectives of the *Modern Slavery Act*;
- modern slavery in Australia;
- Urban Utilities' obligations under the Act;
- actions being undertaken by Urban Utilities to address modern slavery in its business;
- how to identify signs of modern slavery;
- potential modern slavery risks for Urban Utilities;
- how to report concerns of modern slavery; and
- additional tools and resources.

Completing the training module is mandatory for employees whose roles require an understanding and awareness of modern slavery risks in our operations and supply chains, including our Executive Leadership Team, senior managers, contract managers, human resources, risk, legal and compliance teams, and procurement team.

**As at 30 June 2022, 445 employees had completed the Modern Slavery Awareness Training, which includes knowledge checks.** The cumulative number of employees completing the training will continue to increase each year as the training, and refresher training, continues to be rolled out across the business.

## 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

We also recognise the importance of providing training and support to our suppliers, to build their capacity to effectively manage modern slavery risks. Our interactions with existing and emerging suppliers, including those in our extended supply chains, are a valuable experiential learning opportunity. We invest time in engaging in two-way dialogue to build understanding of modern slavery and provide guidance on implementing appropriate actions to address potential human rights risks. To this end, we developed an external facing modern slavery awareness training video during the reporting period.

In addition, our Procurement and Supply team utilises media monitoring services in order to be alerted to emerging issues, 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.

Our Legal team also monitors the legal and political environments for legislative change, precedents and political directives.

### 4.4 GRIEVANCE AND REMEDIATION PROCESSES

We are committed to the protection and respect of human rights across our business and supply chains. Our UrbanDisclosure Program is an independent service that provides a mechanism for employees, contractors, suppliers, customers, as well as the broader community to raise grievances, including potential instances of modern slavery and human rights abuses, and report concerns about illegal, unethical or suspect behaviour that is contrary to the Urban Utilities Code of Conduct, values and behaviours. Information about our UrbanDisclosure Program is available on our website.

Our Complaints Management Policy and framework includes human rights considerations, with complaints of a human rights nature categorised as high priority, and modern slavery whistleblowers are protected under Queensland legislation and under our Fraud, Corruption and Whistleblower Policy and associated procedures.

### CASE STUDY EXPANDING MODERN SLAVERY AWARENESS AND EDUCATION

As part of our broader awareness and education program, we developed and published a modern slavery training video on our website.

The purpose of the video is to increase awareness and understanding of the *Modern Slavery Act* to our suppliers, customers, stakeholders and the community.

The training video includes:

- an overview of the Act and its objectives;
- what modern slavery is;
- examples of modern slavery, including high risk products and sectors;
- Urban Utilities' obligations under the Act;
- actions being taken by Urban Utilities to identify and address modern slavery in its supply chains;
- Urban Utilities' Supplier Code of Conduct; and
- how to report concerns of modern slavery.

The link to the video is provided to suppliers when seeking the completion of our Modern Slavery Supplier Questionnaire.

# 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

## 4.5 COLLABORATION AND STAKEHOLDER ENGAGEMENT

Collaboration is a key component of our modern slavery response. Working closely with our suppliers, business partners, and government agencies enables us to share learnings and insights; identify and contribute to the development of good-practice responses; improve our awareness of modern slavery and its affects; and to contribute to and help drive transparency of modern slavery in Australia in order to mitigate and eliminate its risks.

We support industry initiatives and regularly participate in external forums that encourage people to share knowledge, learnings and best practice. This helps overcome challenges and evaluate whether our initiatives are in line with industry and societal expectations.

During this reporting period we:

- Continued to participate on the Queensland Government Modern Slavery Community of Practice, which was established by Queensland Rail following the introduction of the Act. This group is made up of representatives from Queensland-based government entities and statutory authorities to share learnings and best practice initiatives on identifying, assessing and mitigating modern slavery risks.
- Contributed to the Queensland Government modern slavery framework and roadmap by:
  - attending meetings to share our knowledge and learnings and inform policy; and
  - providing input into the development of departmental documents.
- Urban Utilities and Unitywater were invited to attend the April 2022 Queensland Water Board meeting, which is comprised of Queensland local councils, to provide an overview of the Act, actions we have completed to date, and to discuss potential opportunities to collaborate with water utilities in Queensland via a modern slavery community of practice forum.
- Commenced discussions with the Water Services Association of Australia on developing a national water utilities approach to complying with the Act.
- Participated in the annual Bridge to Brisbane fun run charity event to raise awareness of modern slavery. Please refer to the case study for further details.

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

### CASE STUDY RAISING MODERN SLAVERY AWARENESS

We recognise the importance of collaboration and education to raise awareness of modern slavery.

During the reporting period, a team from the Urban Utilities' Integrated Solutions area, joined teams from our Capital Delivery Partners, Downer and WSP, in participating in the annual Bridge to Brisbane fun run charity event.

The team chose to promote *International Justice Mission (IJM) Australia* as their charity of choice. IJM is the largest anti-slavery organisation in the world whose purpose it is to:

- free people trapped in slavery;
- combat violence against women and children; and
- eliminate police abuse of power against people who are poor.

Numerous internal and external communication initiatives were initiated in the lead up to the run to raise staff awareness of modern-day slavery and this charity event, with employees encouraged to participate in the event or donate money to the charity. Over \$5000 was raised by the team.

In a message subsequently received from the Chief Executive Officer of IJM Australia, confirmation was provided that the donation received directly assisted IJM's front line teams across the Asia-Pacific and the world to rescue and protect children, women and men from modern-day slavery and violence. A link to the short video is provided here:







 [CLICK TO WATCH VIDEO](#)

## 4. ACTIONS TAKEN TO ASSESS AND MITIGATE MODERN SLAVERY RISKS

### KEY ACTIONS FOR FY22









#### OPERATIONS

- 
 Developed and implemented the *Assessing Compatibility with Human Rights Procedure* to provide guidance as to when and how human rights should be integrated into Urban Utilities' decision-making processes.
- 
 Continued to embed the consideration of human rights impacts in our actions and decision-making processes, including in new and existing policies, procedures and standards, to align with our legislative and social obligations and risk profile.
- 
 Refreshed our online Modern Slavery Awareness Training taking cognisance of feedback provided by employees via our training effectiveness survey, as well as aligning the content with the Australian Government's *Modern Slavery in Public Procurement* e-Learning module.
- 
 Continued to roll out our Modern Slavery Awareness Training for employees occupying roles that require an understanding and awareness of modern slavery risks in our operations, supply chains or both.
- 
 Developed and implemented a *Modern Slavery Working Group Charter*, which outlines the purpose of the working group, its function, membership, structure and frequency of meetings.
- 
 Continued to monitor media alerts to ensure we keep abreast of current and emerging human rights issues and modern slavery risks to our business.



#### SUPPLY CHAIN

- 
 Developed and published a modern slavery training video on our website to cement Urban Utilities' modern slavery elimination expectations, build awareness and understanding and support engagement and relationship building.
- 
 Implemented a process where Modern Slavery Supplier Questionnaires are reissued every two years to our active suppliers.
- 
 Continued application of supply chain due diligence processes to ensure modern slavery risks are evaluated effectively during procurement processes, including the supplier onboarding process.
- 
 Continued to assess and map Urban Utilities' tier one supply chains, including new and existing suppliers via the Modern Slavery Supplier Questionnaire.
- 
 Reviewed and updated our Supplier Code of Conduct to enhance supplier obligations pertaining to corporate governance and ethics.
- 
 Continued monitoring the impacts of COVID-19 on our supply chains, prioritising countries and products/sectors most at risk.

## 5. EFFECTIVENESS OF OUR ACTIONS

We recognise the value of continual improvement and the importance of assessing the effectiveness of the actions and outcomes taken to address modern slavery risks.

Urban Utilities' Modern Slavery Action Plan sets out activities to be completed year-on-year to identify modern slavery risks, implement controls to mitigate these risks and implement assurance activities to provide oversight that the risks are being managed. Our progress against this Action Plan is monitored by our cross-functional Modern Slavery Working Group.

Accordingly, our Modern Slavery Working Group is best placed to lead the evaluation process of the effectiveness of our actions, which include:

- an annual review of the modern slavery risk of our operations via our Modern Slavery Risk Assessment Tool;
- monitoring the progress of supplier risk and assurance activities;
- measuring our performance through the establishment of metrics;
- seeking feedback from employees on the effectiveness of our training via our online survey; and
- collaborating with other organisations to share knowledge and identify gaps.

In addition to the above, we regularly review and assess the effectiveness of our policies, procedures, codes and standards as part of our Risk Management Framework.

### METRICS USED TO MONITOR OUR PROGRESS INCLUDE:

NUMBER OF DESKTOP RISK ASSESSMENTS UNDERTAKEN BY GEOGRAPHIC, INDUSTRY/SECTOR RISK, AND PRODUCT OR SERVICE RISK

NUMBER OF MODERN SLAVERY SUPPLIER QUESTIONNAIRES ISSUED

NUMBER OF TIER ONE SUPPLIERS ASSESSED VIA OUR MODERN SLAVERY RISK ASSESSMENT TOOL

% OF SUPPLIER SPEND ASSESSED VIA THE RISK ASSESSMENT TOOL

NUMBER OF EMPLOYEES WHO HAVE COMPLETED OUR MODERN SLAVERY TRAINING

% OF ENROLLED EMPLOYEES THAT HAVE COMPLETED MODERN SLAVERY TRAINING

INSIGHTS PROVIDED FROM MODERN SLAVERY TRAINING SURVEY

NUMBER OF MODERN SLAVERY RELATED WHISTLEBLOWING ALERTS RAISED DURING THE YEAR

NUMBER OF HUMAN RIGHTS COMPLAINTS RAISED DURING THE YEAR

NUMBER OF VIEWS OF OUR EXTERNAL FACING MODERN SLAVERY TRAINING VIDEO

Insights drawn from these measurements inform our immediate and longer-term risk management approach and feed into our Modern Slavery Action Plan and our overall human rights strategy.



## 6. LOOKING FORWARD

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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 evolve as we learn from our risk assessments, refine our practices and continue to build knowledge and capacity across our business.

Looking ahead, we have identified the following key areas of focus for FY23 and beyond:



### POLICY AND GOVERNANCE

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- Review and uplift our policies, procedures, codes and standards to more squarely address expectations around respecting human rights where required.
- Implement a process where our Supplier Code of Conduct is part of our contract renewal process.
- Continue to embed the consideration of human rights impacts in our actions and decision-making processes, including in new and existing policies, procedures, codes and standards, to align with our legislative and social obligations and risk profile.



### TRAINING AND AWARENESS

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- Engage with our suppliers to raise awareness and improve performance as part of our contract management and supplier relationship management frameworks.



### GRIEVANCE AND REMEDIATION

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- Develop and implement a Modern Slavery Response Protocol which outlines the steps to report suspected instances of modern slavery exploitation.



### RISK ASSESSMENT AND DUE DILIGENCE

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- Develop a Modern Slavery Toolkit to assist procurement practitioners, contract managers and decision makers in how to identify, mitigate and respond to modern slavery risks in our supply chains.
- Undertake a market sounding exercise to assess third-party platforms which will assist with our due diligence activities.
- Implement a process to assess modern slavery risks in our tier two supply chains.
- Continued application of supply chain due diligence processes to ensure modern slavery risks are evaluated effectively during procurement processes, including during the supplier onboarding process.
- Continue to assess and map Urban Utilities' tier one supply chains, including new and existing suppliers via the Modern Slavery Supplier Questionnaire.



### COLLABORATION AND STAKEHOLDER ENGAGEMENT

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- Collaborate with our industry peers through the Water Services Association of Australia Community of Practice to discuss opportunities to establish / co-ordinate a national industry wide approach to addressing modern slavery.

We are proud of our progress to date, but we recognise there is more to do. We are committed to the ongoing delivery of our initiatives and partnering with our suppliers and stakeholders to eradicate modern slavery.

# 7. CONSULTATION, ENDORSEMENT AND APPROVAL

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## 7.1 CONSULTATION

The following internal business areas were consulted throughout the development of this Statement:

- Legal and Risk;
- Corporate Affairs;
- Experience; and
- Procurement and Supply.

## 7.2 ENDORSEMENT

This Statement was endorsed by Urban Utilities' Executive Leadership Team on 13 October 2022.

## 7.3 APPROVAL

This Statement was approved by the Urban Utilities Board on 21 November 2022 and is signed by Bronwyn Morris, Chair of Urban Utilities Board and Paul Arnold, Chief Executive Officer, in accordance with the requirements of Section 13 of the *Modern Slavery Act 2018* (Cth).

We declare that the information provided in this Statement, to the best of our knowledge, is complete and accurate.



**Bronwyn Morris**  
Chair of Urban Utilities Board



**Paul Arnold**  
Chief Executive Officer

# APPENDIX I – URBAN UTILITIES KEY DATA UPDATES AND PERFORMANCE INDICATORS FROM FY19 TO FY22

|   | FY19  | FY20  | FY21  |
|---|---|---|---|
| Total workforce number  | 1370  | 1157  | 1140  |
| # of permanent employees  | 1121  | 1080  | 1055  |
| # of active suppliers   | 930   | 802   | 798   |
| Supplier spend  | \$550M  | \$490M  | \$449M  |
| # of overseas suppliers   | 16  | 26  | 27  |
| Spend with local suppliers  | \$549M  | \$484M  | \$448M  |
| Spend with overseas suppliers   | \$1.3M  | \$5.2M  | \$1.3M  |
| Higher risk goods and services categories   | <b>Goods</b> <ul style="list-style-type: none"> <li>• Electronics</li> <li>• Clothing</li> <li>• Concrete/asphalt</li> <li>• Bricks</li> <li>• Steel</li> </ul> | <b>Goods</b> <ul style="list-style-type: none"> <li>• Electronics</li> <li>• Clothing and Protective Personal Equipment</li> </ul>  | <b>Goods</b> <ul style="list-style-type: none"> <li>• Electronics</li> <li>• Clothing and Protective Personal Equipment</li> <li>• Merchandising and promotional products</li> </ul>      |
|   | <b>Services</b> <ul style="list-style-type: none"> <li>• Traffic Control</li> <li>• Security Services</li> <li>• Cleaning and Facilities Management</li> </ul>  | <b>Services</b> <ul style="list-style-type: none"> <li>• Traffic Control</li> <li>• Security Services</li> <li>• Cleaning and Facilities Management</li> </ul>                            | <b>Services</b> <ul style="list-style-type: none"> <li>• Traffic Control</li> <li>• Security Services</li> <li>• Cleaning and Facilities Management</li> </ul>                            |
| # of suppliers assessed via desktop (that is, risk profiles such as country, industry/sector, products or services) | n/a<br>(New FY20 process)   | 144   | 161   |
| Cumulative total # of SAQs issued   | 61  | 108   | 170   |
| Cumulative total # of SAQs assessed via Risk Assessment Tool  | 50  | 108   | 168   |
| % of supplier spend assessed via Risk Assessment Tool   | 58%   | 74%   | 80%   |
| Cumulative total # of employees that have completed modern slavery training   | 27  | 304   | 445   |
| % of enrolled employees that have completed modern slavery training   | 99%   | 92%   | 98%   |
| Insights from modern slavery training survey  | n/a<br>(New FY20 process)   | <ul style="list-style-type: none"> <li>• 90% are very aware of what modern slavery is; and</li> <li>• 71% have a very good understanding of actions Urban Utilities is taking.</li> </ul> | <ul style="list-style-type: none"> <li>• 90% are very aware of what modern slavery is; and</li> <li>• 72% have a very good understanding of actions Urban Utilities is taking.</li> </ul> |
| # of views of our external facing modern slavery training video   | n/a<br>(New FY21 process)   | n/a<br>(New FY21 process)   | 26  |
| # of modern slavery related whistleblower alerts raised   | 0   | 0   | 0   |
| # of human rights complaints raised   | 0   | 0   | 0   |

# APPENDIX 2 – MODERN SLAVERY STATEMENT COMPLIANCE CHECKLIST

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  | MODERN SLAVERY STATEMENT FY22  |
|---|--|
| Identify the reporting entity.  | Inside front cover (page 2)  |
| Describe the reporting entity's structure, operations and supply chains.  | Our structure, operations and supply chains (pages 5 – 9)  |
| 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 in our operations and supply chains (pages 10 – 14)  |
| 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 mitigate modern slavery risks (pages 15 – 23)  |
| Describe how the reporting entity assesses the effectiveness of these actions.  | Effectiveness of our actions (pages 24)  |
| Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.   | Urban Utilities does not own or control any other entities and therefore this criterion is not applicable.   |
| Any other information that the reporting entity, or the entity giving the statement, considers relevant.  | Introduction (page 3)<br>Looking forward (page 25)<br>Consultation, endorsement and approval (page 26)<br>Appendix 1 - Urban Utilities key data updates and performance indicators from FY19 to FY22 (page 27) |



 **UrbanUtilities**

For more information visit  
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