



Modern Slavery Statement

2024-25

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Acknowledgement of Traditional Owners/Custodians

We acknowledge the Traditional Owners of the Gippsland Water area, the Gunaikurnai people and the Bunurong people, and recognise their strong cultural connection to the land and waterways. We pay our respect to their Elders, past and present.



Figure 1. Commissioned artwork from local Aboriginal artist, Gunaai artist Alice Pepper

Context

Central Gippsland Region Water Corporation (Gippsland Water) is committed to the responsible management of water resources, the provision of high-quality and affordable water services, and the delivery of effective wastewater management solutions to safeguard public health.

In addition to our core functions of water and wastewater management, we operate two commercial enterprises, being an agricultural business and an organic waste management facility. These operations play a vital role in supporting the organisation's broader objectives, generating value for our customers, the local community, and the state.

In pursuit of these goals, our diverse and capable teams collaborate with the community, developers, and a range of partners, contractors, and suppliers. Our organisational values underpin all our activities and interactions, reflecting our commitment to ethical practices and sustainable outcomes.

In line with these values, we are dedicated to ensuring that modern slavery is not present in our operations or supply chain.

This Modern Slavery Statement has been prepared in accordance with section 13 of the Australian Commonwealth *Modern Slavery Act 2018* (Cth).

It outlines the steps we have taken to assess and address the risks of modern slavery within our organisation and supply chain during the reporting period of 1 July 2024 to 30 June 2025.

The scope of our operations and supply chain has not changed significantly from the previous reporting period to the current one. Consequently, this year's statement is closely aligned with, and expands upon our 2023-24 Modern Slavery Statement.

About Us

Gippsland Water, officially known as the Central Gippsland Region Water Corporation (ABN 75 830 750 413), is a regional water corporation based in Victoria, Australia. Established under the *Water Act 1989* (Vic), Gippsland Water was constituted on 21 December 1994.

We operate under a Board of Directors appointed by the Minister for Water. We're regulated by the Essential Services Commission (ESC), the Department of Energy, Environment and Climate Change Action (DEECA), Department of Health (DoH) and the Environment Protection Authority Victoria (EPA).

Our Vision

We take pride in partnering with the community in providing quality water and waste services so we can enjoy a healthy and sustainable Gippsland for generations to come.

Our Strategic Priorities and Values

Over the next five years, our strategic priorities will focus on the most important initiatives that align with the values we gathered through customer feedback during our pricing submission process. These priorities are reviewed and updated annually to ensure they remain in line with our commitments as outlined by the Victorian Government.



Our Services

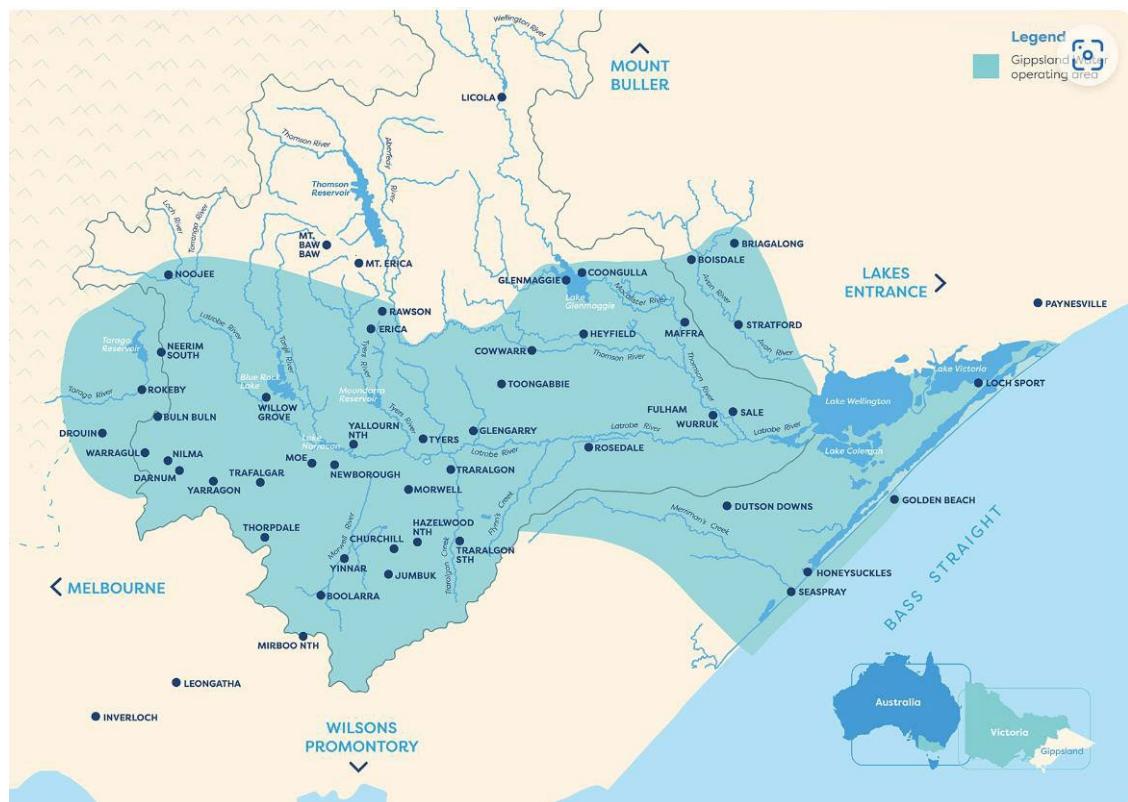
We supply drinking water to 76,490 households and businesses, and wastewater services to more than 69,000 households and businesses, across 43 towns. Our customers include major industries, some of which are of state and national significance.

We take water from 13 different sources including aquifers, rivers, creeks, and reservoirs and treat it to meet our strict water quality standards. Our largest storage is Moondarra Reservoir, south of Erica, with a capacity of 30,458ML. We also take water from

storages managed by Southern Rural Water (Blue Rock Lake and Lake Glenmaggie) and Melbourne Water (Tarago Reservoir).

Our \$1.8 billion infrastructure network includes more than 2,200 km of water mains, 15 water treatment plants, over 1,800 km of wastewater mains and 14 wastewater treatment plants.

Our service area covers over 5,000 square kilometres in the municipalities of Latrobe City, Baw Baw, South Gippsland, and Wellington Shires and stretches from Drouin in the west to Loch Sport in the east, and from Mirboo North in the south to Rawson and Briagolong in the north.



Our commercial businesses

As well as providing water and wastewater services, we run commercial businesses, including an agricultural business and an organic waste management facility. These businesses are an integral part of what we do, providing benefits to us, our customers, the region, and the state.



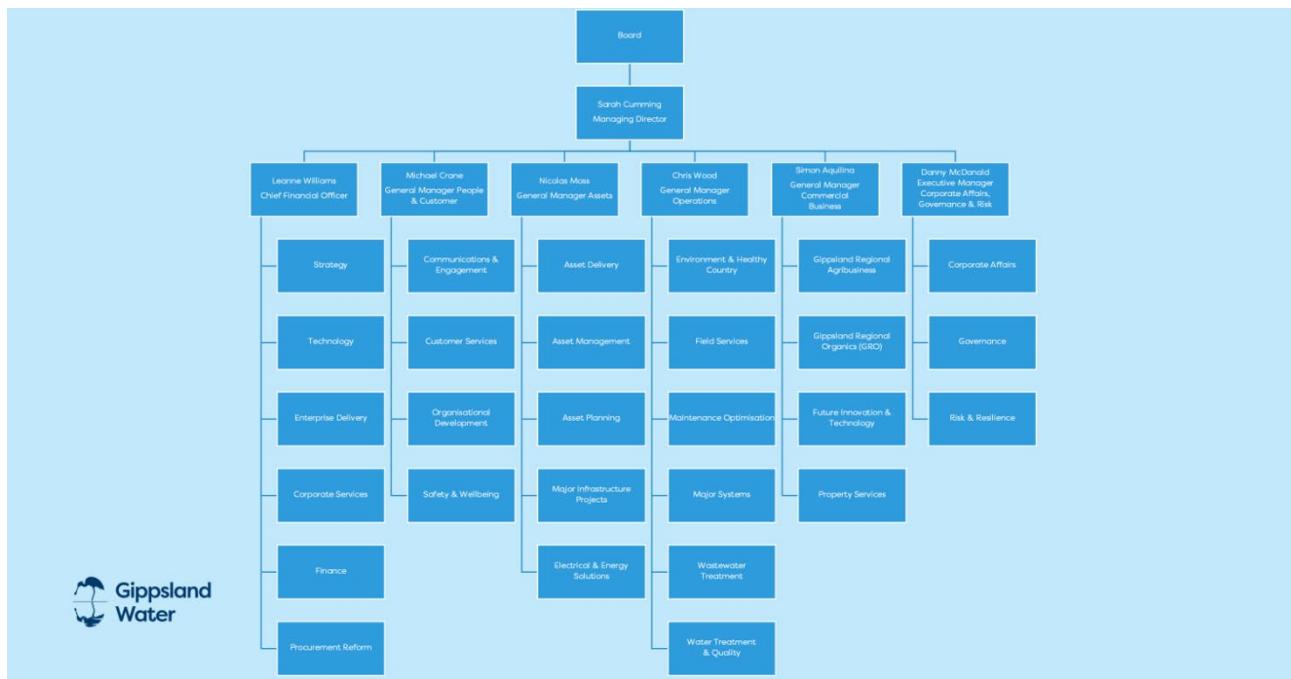
Our Gippsland Regional Agribusiness operations help us to effectively manage, and reuse treated wastewater and by-products. This business includes 12 farming sites producing a combination of beef, fodder crops, grain crops, and softwood plantation timber and forestry properties covering 10,000 Ha across the central Gippsland region. Our largest property, Dutson Downs, spans a massive 8,500 Ha near Golden Beach.



Our largest farm, Dutson Downs, is located 25 kilometres south-east of Sale. This is also where we operate our organics business, Gippsland Regional Organics. Primarily founded to process our internal waste streams and offset the costs of disposal, the facility transforms approximately 180,000 tonnes of organic waste each year into valuable, nutrient rich composts that are then used by farms and other horticultural and industrial enterprises right across Victoria.

Organisation Structure

With over 400 operational, engineering, financial, environmental, and administrative employees, we are a major local employer for the region serving an estimated population base of over 165,000.



Supply Chain

We are 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.

Our operations make a significant positive contribution to our region's economy and livability. During 2024-25, the organisation had a \$198 million turnover supported by \$1.7 billion in assets and spent \$65 million in capital and related infrastructure works.

Gippsland Water's supply chain includes the purchase of goods 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.

We worked with well over 1000 suppliers during the 2024-25 financial year and spent \$199,423,553 with these suppliers. Most of these suppliers are local (Australia/New Zealand), with 6 suppliers located outside of our local region. All these suppliers relate to ongoing software licensing and the provision of training services and are located within the United States (US) or Europe.

Governance

Our own procurement documentation guides our activities to ensure that our buying power advances social, economic, and environmental objectives.

As a Victorian Government-owned organisation, we aim to ensure that our purchases represent value for money and are sourced fairly and ethically.

We require our suppliers to operate in accordance with applicable modern slavery laws.

Throughout 2024-25 our spending threshold guidelines for procurements of goods and services exceeding \$100,000, construction services exceeding \$300,000, and construction works exceeding \$750,000 enforced a competitive tendering process. Below these thresholds a limited tender process was utilised.

This ensures enhanced transparency, with all successful tenders, including supplier details, being published on the official Victorian Government tender system for goods, services, and construction projects.

Management of Modern Slavery Risks

Identifying modern slavery risk in our operations and supply chains

Gippsland 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, and Public Interest Disclosure (whistle-blower) Policy.

We acknowledge that the risks of modern slavery may be present because of the characteristics of the industry of our suppliers, the products and services produced or provided, the geographical location of some of our suppliers, and the complexity of the supply chains used in products and services supplied to us.

The following categories have been identified as representing potential sources of human rights risks across all areas of our business, including our commercial businesses:

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

Operations	Supply Chains	
Asset Maintenance	<ul style="list-style-type: none"> • Water treatment services. • Waterways. • Operations & maintenance of assets. 	<ul style="list-style-type: none"> • Operation & maintenance of facilities, including cleaning. • Land care services & conservation management.
Construction	<ul style="list-style-type: none"> • Engineering, Constructions & Major Projects. 	<ul style="list-style-type: none"> • Engineering consulting / technical services.
Corporate	<ul style="list-style-type: none"> • Purchase & lease of properties. • Electricity, gas, utilities. • Commercial travel. • Freight, couriers & mail. • Temporary labour hire. • Professional services. • Marketing & advertising. 	<ul style="list-style-type: none"> • Staff training services. • Fleet purchase, maintenance & operation. • Stationery & office equipment. • Security services. • Research. • Insurance services.
Customer	<ul style="list-style-type: none"> • Call center services. • Customer research services. 	<ul style="list-style-type: none"> • Debt collection services. • Printing of bills & notices.

Operations	Supply Chains	
Equipment & Materials	<ul style="list-style-type: none"> Supply & Storage of chemicals. Hire of construction equipment. 	<ul style="list-style-type: none"> Service & maintenance of equipment. Consumable supplies.
Information Technology	<ul style="list-style-type: none"> Supply of IT hardware. Telecommunication expenses. 	<ul style="list-style-type: none"> IT Software & licensing. IT Services.
Other	<ul style="list-style-type: none"> Fleet and Facility. Office stationery. 	<ul style="list-style-type: none"> Purchase of vehicles and maintenance. Office consumables etc.

Actions Taken to Address Modern Slavery Risks

The scope of our operations and supply chain has not changed significantly from the previous reporting period to the current one. Consequently, this year's statement is closely aligned with and expands upon our 2023-24 Modern Slavery Statement.

Over this reporting period, Modern Slavery risks associated with our operations and supply chains, have been mitigated through market analysis, market documentation, tender evaluation and standard contractual clauses addressing Modern Slavery.

Supplier Code of Conduct

Tenderers were provided a Supplier Code of Conduct Commitment Letter Template as part of the response schedules. The letter directed Tenderers to the following link [Supplier Code of Conduct | buyingfor.vic.gov.au](https://buyingfor.vic.gov.au/Supplier-Code-of-Conduct), and to submit a signed Supplier Code of Conduct Commitment Letter as part of their tender response. In April 2025, the requirement for the Commitment Letter was replaced with the inclusion of model clauses, created within the tender and contract documentation. The Supplier Code of Conduct was strengthened with mandatory minimum standards set and compliance requirements established. This has been implemented with all new procurements subject to the new standard model clauses.

Fair Jobs Code

Suppliers tendering for procurement contracts that meet the Fair Jobs Code threshold must hold a Pre-Assessment Certificate to confirm their compliance with industrial relations and occupational health and safety law over the previous three years.

More information on the Fair Jobs Code can be found here:

<https://www.buyingfor.vic.gov.au/fair-jobs-code-departments-and-agencies>

Additional Policies

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

Document name	Purpose
Staff Code of Conduct	Details the expected conduct for employees within the Victorian public sector, including provisions related to fair employment practices and the recognition and respect of the human rights of all individuals.
Corporate Social Responsibility Policy	At Gippsland Water, as a manager of Central Gippsland's most valuable resource, our water, we have a clear obligation to operate in an environmentally sensitive and socially responsible manner. This obligation is further constituted under the Water Act (1989). Gippsland Water sees the maintenance of a Corporate Social Responsibility (CSR) program as enhancing its core values of open dialogue, integrity and respect, collaboration, accountability, capability, safety, and wellbeing and recognises that failure to achieve compliance with policy objectives may lead to loss of reputation.

Document name	Purpose
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, construction work and construction services by Gippsland Water.
Contract Management Policy	Risks to Modern Slavery practices are further mitigated through contract management processes and any breach of the Supplier Code of Conduct is addressed.

Effectiveness of Actions

Industry Approach to Modern Slavery

We continue to work with other water authorities to share insights and actions related to modern slavery in the water industry.

Practical effectiveness

We have a large array of policies, frameworks, and procedures in place to ensure our procurement processes incorporate risk management requirements, including modern slavery risks.

These provide guidance to our staff and key stakeholders in considering modern slavery risks in both our operations and supply chains.

During 2024-25, we have continued to provide guidance and support to our Contract Responsible Officers in the implementation of appropriate contract and tender documentation, considering modern slavery risks.

Tender responses continue to adhere to our requirements and Gippsland Water recognises that the assessment of the effectiveness of our actions is an ongoing and evolving process.

Practical effectiveness: Case Study

In this reporting period we undertook a procurement to ensure any Supplier who we purchase Personal Protective Equipment from is accredited with Ethical Clothing Australia [Accreditation - Ethical Clothing](#) and commits to the Supplier Code of Conduct.

Purchasing from Suppliers who have Ethical Clothing Australia accreditation ensure the Suppliers we purchase from:

- are compliant with Australian labour laws.
- have evidence of adherence to labour laws and supply chain transparency.
- engage in a rigorous accreditation program to underpin modern slavery reporting obligations.

The Way Forward – 2025-26

Capability Building

Effectively managing our modern slavery risks is a long-term commitment. In 2025-26 we will focus on capability building within the organisation.

This will be done by:

- Enhancing the Supplier qualification process to include checking their ethical performance by reviewing any adverse media and checking the Modern Slavery Register.
- Enhancing our Contract Management processes to ensure Modern Slavery risks are mitigated throughout the life of the contract (for example, ensuring relevant accreditation or certification remains current during the life of relevant contracts).
- Ensuring that staff involved in Procurement and Contract Management undertake the Learning Modules available via the Register.
- Continued application of the Social Procurement Framework including mandatory and relevant weighting in tender evaluation criteria.
- Sharing insights and knowledge through established collaboration meetings with peers at neighboring Water Corporations.
- Continuing engagement with the Victorian Governments Innovation Network.
- Investigation into software to assist with Modern Slavery data capture and reporting.

Approval

This statement has been approved by the Board of Gippsland Water on 24 October 2025 and has been signed by Tom Mollenkopf AO (Board Chair) who is authorised to sign this statement on behalf of Gippsland Water.



Tom Mollenkopf AO
Board Chair



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