



MODERN SLAVERY STATEMENT 2024/25



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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 revenue over \$500M, we are classified as a reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)* (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 2025 (FY25), pursuant to the Act.

Urban Utilities does not own or control any other entities.

ACKNOWLEDGEMENT
OF COUNTRY






Urban Utilities acknowledges the Traditional Custodians of the land on which we connect, share, and learn, and we pay our respects to Elders past and present as we work towards a more reconciled Australia.

I. INTRODUCTION

Urban Utilities remains committed to addressing modern slavery risks in our operations and supply chain.

In our sixth Statement, we outline our processes for assessing and addressing risk, the progress we have made, and our future commitments.

Our Procurement Framework guides our modern slavery risk management actions, focusing on:

-  strong policies and procedures
-  risk assessment and due diligence
-  training and awareness
-  grievance and remediation
-  collaboration and stakeholder engagement.

We are committed to delivering our products and services in a way that uphold our corporate values and respect fundamental human rights. This Modern Slavery Statement embodies our commitment to enhancing the wellbeing of our people, our supply chains and the communities we serve. We will continue to build on our efforts to address modern slavery, share our progress transparently, and support lasting, positive change within the water industry.

Principal governing body approval

This Statement was approved by the Urban Utilities Board on DATE 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.

Signature of responsible member

This Statement is signed by Paul Vincent, Chair of the Urban Utilities Board, and Paul Arnold, Chief Executive Officer, as responsible members in accordance with the Modern Slavery Act 2018.



Paul Vincent
Urban Utilities Board Chair



Paul Arnold
Chief Executive Officer

2. ABOUT US

WHO WE ARE

Formed on 1 July 2010, Urban Utilities operates as a statutory body under the *South-East Queensland Water (Distribution and Retail Restructuring) Act 2009* and as a service provider under the *Water Supply (Safety and Reliability) Act 2008*.

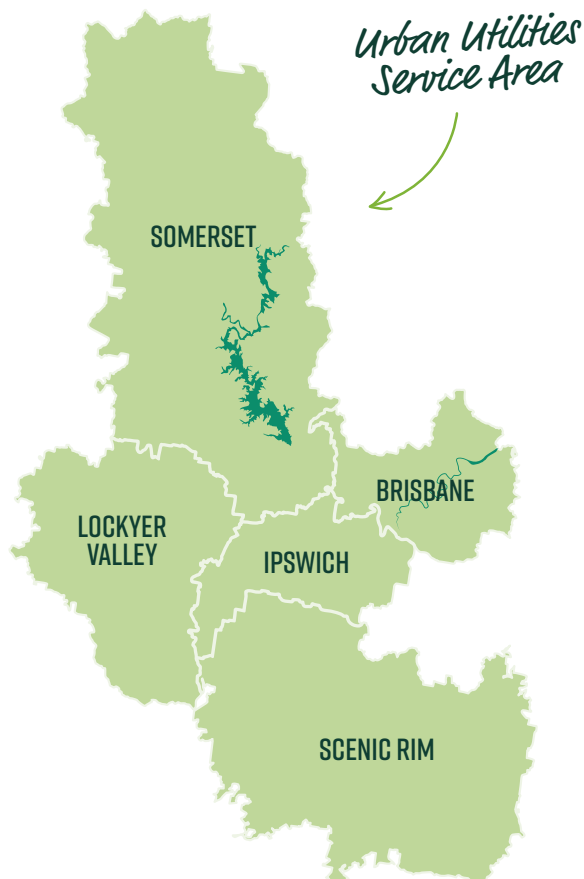
Governed by an independent, skills-based Board, Urban Utilities is party to a Participation Agreement with our shareholders (Participant Councils): Brisbane City Council, Ipswich City Council, Lockyer Valley Regional Council, Scenic Rim Regional Council and Somerset Regional Council.

WHAT WE DO

Urban Utilities is one of Australia's largest water distributor-retailers. We proudly deliver water and wastewater services to around 1.6 million customers across the regions of Brisbane, Ipswich, Lockyer Valley, Scenic Rim and Somerset.

WHERE WE OPERATE

Our 14,384 km² geographic area spans five local government regions in South East Queensland:



2.1 OUR STRATEGIC DIRECTION

Our Strategic Direction

OUR PURPOSE

Enrich quality of life.

OUR STRATEGIC PRIORITIES

We refer to our strategic priorities as 'The Critical Few'. By organising our work around these three fundamental areas, we remain focused on what really matters.



Safe and efficient water services every day

Get the foundations right to deliver liveability outcomes for our customers and communities every day.



Build trust

Never fail on our promise to customers and remain the trusted custodians of our communities' water assets.



Shape and grow our future

Sustain long-term value, address climate and asset risk, and leverage new value from core capabilities and innovative partnerships.

OUR CRITICAL OUTCOMES

We assess our performance against five Critical Outcomes across related key performance indicators and the achievement of defined targets

- **Safety** - We protect the safety of our people and the public.
- **Public Health** - We protect the public health of the communities we serve.
- **Environment** - We deliver environmental value.
- **Experience** - We deliver a great experience for our customers and our people.
- **Value** - We optimise costs and grow value.

OUR VALUES

Our values, summarised as CARE, guide the way we deliver experiences for our people, customers and the communities we serve.

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 Real.** 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.

2.2 OUR OPERATIONS

Urban Utilities is one of the largest water service providers in Australia, supplying drinking water, recycled water and wastewater services to approximately 655,000 residential properties and approximately 30,000 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 infrastructure network, which is supported by a workforce of 1,261 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)
- research and development.

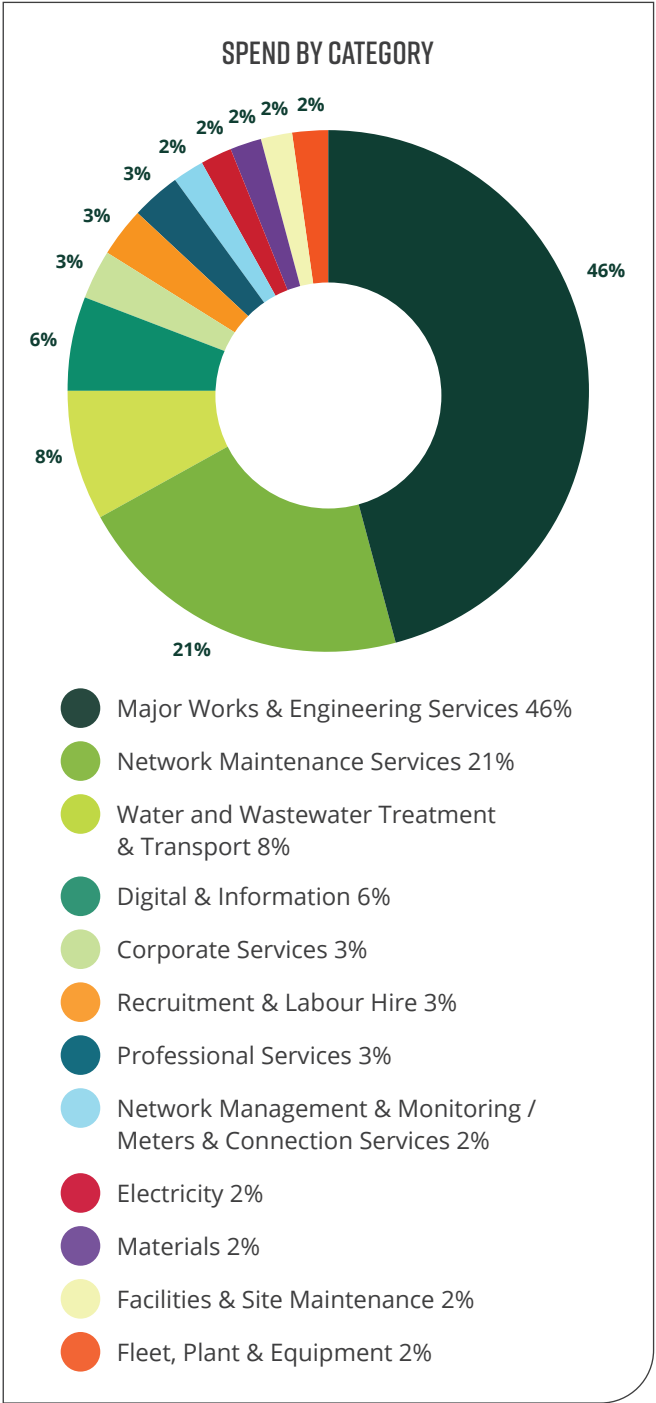
Urban Utilities also operates the Scientific Analysis Services (SAS) Laboratory (an internal business unit), which is responsible for providing water sampling services and chemical and microbiological analysis to Urban Utilities and a range of private and public sector entities.

For full details, please refer to Urban Utilities’ Annual Report FY25

2.3 OUR SUPPLY CHAINS

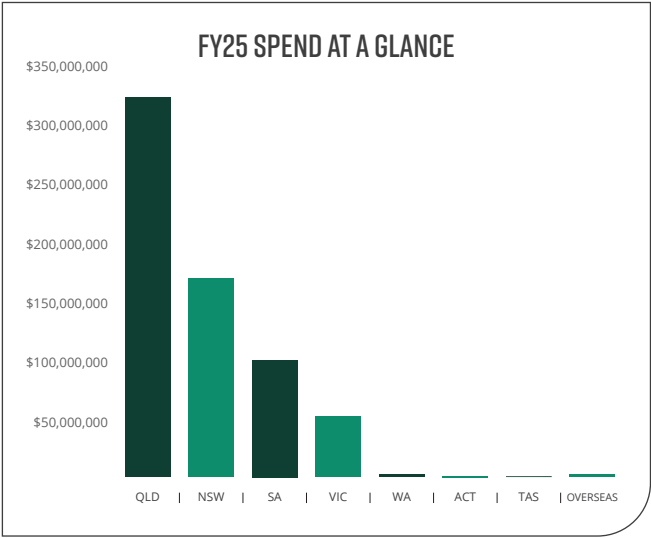
During the reporting period, Urban Utilities managed a supply base of 864 suppliers.

The graph below shows our categories of procurement spend to support our capital projects and core operational functions across our Australian and international supply base.

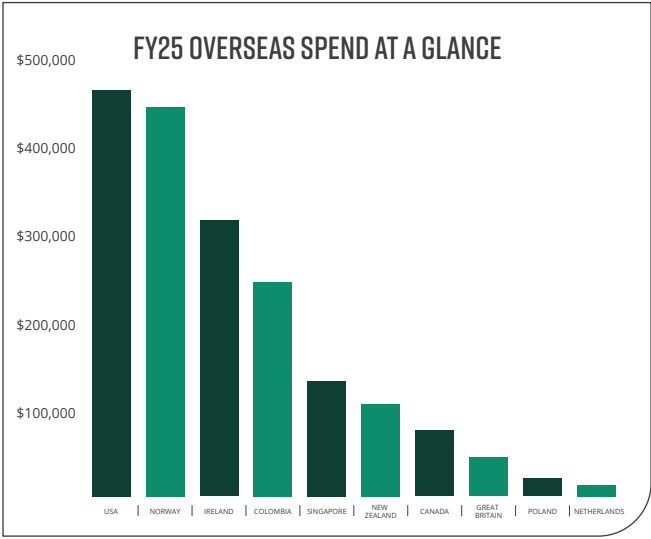


2.3 OUR SUPPLY CHAINS CONTINUED

Where possible, we are committed to procuring goods from Queensland and Australian-based suppliers and, as evidenced by the graph below, approximately 99.71% of our \$640.55M FY25 supplier spend was with suppliers located in Australia. In addition, many of our suppliers are small local businesses that play a key role in the delivery of our services.



The remaining 0.29% is attributed to a total of 23 overseas suppliers located across 10 countries as depicted in the graph below.



The following table provides a breakdown of the types of goods or services being provided by our suppliers who are registered overseas.

Country of registration	Number of Suppliers	Category of Spend
United States of America	9	Software licences, support and maintenance; HR services
Canada	3	Software licences, support and maintenance; Laboratory consumables & equipment
Great Britian	3	Software licences, support and maintenance; Professional membership & subscriptions
Ireland	2	Software licences, support and maintenance
Norway	1	Mechanical equipment, components & consumables; Pumps, accessories & spares
Colombia	1	ICT support services
Singapore	1	HR services
New Zealand	1	Mechanical equipment
Poland	1	Software licences, support and maintenance
Netherlands	1	Software licences, support and maintenance

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

In alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPR), Urban Utilities is committed to proactively identifying and addressing the risks of modern slavery within our operations and supply chains. We acknowledge that modern slavery risks may result in Urban Utilities causing, contributing to, or being directly linked to adverse human rights and modern slavery impacts through our business operations and supply chains.

3.1 OUR OPERATIONS

For the duration of the reporting period, labour arrangements data for Urban Utilities included the following:

- 1,571 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. Of this figure, 1,441 were employees (92%) directly engaged by Urban Utilities in a permanent (full-time or part-time) capacity.
- The remaining 8% of our workforce was contingent labour engaged through recruitment agencies, independent contractor or vocational placements.

As at the end of the reporting period, labour arrangements data for Urban Utilities included the following:

- 1,313 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. Of this figure, 1,256 were employees (96%) directly engaged by Urban Utilities in a permanent (full-time or part-time) capacity.
- The remaining 4% of our workforce was contingent labour engaged through recruitment agencies, independent contractor or vocational placements.

Recruitment and Workforce Ethics

Urban Utilities is committed to ensuring all recruitment practices, both internal and via third-party labour providers, are ethical, transparent, and aligned with international human rights principles.

We actively review our recruitment-related controls to minimise the risk of exploitative practices such as

deceptive recruitment, debt bondage, and involuntary work. As part of this work:

- We are working to embed recruitment-specific ethical standards into contracts with labour hire and recruitment partners.
- We are exploring opportunities to conduct periodic audits of recruitment agencies, particularly those providing temporary or contingent workers.

We plan to extend best practice training to hiring managers to build practical capability in identifying modern slavery risk indicators during the recruitment process.

3.2 OUR SUPPLY CHAINS

Urban Utilities sources goods and services in accordance with our corporate policies, procedures and frameworks. These guidelines apply to all employees involved in procurement activities on behalf of Urban Utilities. They outline our approach to planning, sourcing, risk management, supply agreements and managing supplier relationships throughout the procurement lifecycle.

The table below highlights the prevalence of modern slavery risks based on the Global Slavery Index 2023. As shown, the majority of our expenditure is with countries identified as having a low risk of modern slavery.

Table 2. Percentage spend per Country for FY25 and Modern Slavery Risk

Country of spend	% of Spend	Country risk level
Australia	99.710%	Very Low
United States of America	0.070%	Low
Norway	0.070%	Very Low
Ireland	0.050%	Very Low
Colombia*	0.040%	High
Singapore	0.020%	Low
New Zealand	0.020%	Very Low
Canada	0.010%	Very Low
Great Britian	0.006%	Very Low
Poland	0.003%	Low
Netherlands	0.001%	Very Low

*Our supplier based in Colombia provides Urban Utilities with IT support services. This industry is generally considered to carry a low risk of modern slavery.

4. ACTIONS TAKEN

During the reporting period, we prioritised strengthening collaboration to promote a unified and effective approach to identifying, managing, and mitigating modern slavery risks across our operations and supply chain. As part of this effort, we commenced the implementation of Phase One of our Supplier Risk and Compliance Program—an initiative designed to align our practices with global standards and enhance the effectiveness of our internal risk management processes.

A central component of this first phase was the deployment of the Avetta Platform, a leading supplier management system that improves our ability to monitor, assess, and maintain visibility over supplier compliance and risk exposure. This platform enables more systematic data collection, real-time risk indicators, and streamlined compliance tracking, providing greater transparency across our supplier network.

To further embed risk management within our operations, we also created a dedicated Supplier Risk and Compliance Specialist role within the Procurement team. This role plays a key part in supporting supplier compliance activities, delivering training, and driving our ongoing efforts to address modern slavery risks throughout the supply chain.

In addition, we established the Supplier Due Diligence Forum, a cross-functional working group composed of representatives from across the business. The Forum plays a critical role in facilitating informed and timely decision-making by reviewing supplier compliance, addressing potential red flags, and escalating concerns related to supplier conduct, ethical practices, and risk management. This collaborative structure supports a more proactive and integrated approach to supplier oversight and continuous improvement.

4.1 POLICIES AND PROCEDURES

As detailed below, we have a suite of policies and procedures to support our management of modern slavery:

Documents with relevance to management of modern slavery and human trafficking		
Document Name	Purpose	How we implement this document
Risk Management Policy	Outlines Urban Utilities' commitment to using a comprehensive Risk Management Framework for the management and assessment of risk within Urban Utilities.	We publish this policy and its supporting documents on our intranet.
Corporate Compliance Policy	Outlines Urban Utilities' commitment to meeting our legislative compliance obligations in the delivery of our products and services.	We publish this policy and its supporting documents on our intranet.
Complaints Management Policy	Outlines our approach to managing and responding to complaints and feedback received from customers and members of the public.	We publish this policy on our intranet and external website.
Procurement Policy	Sets out the principles that govern the procurement of all goods and services by Urban Utilities.	We publish this policy on our intranet. The policy is also referenced on our external website.
Fraud, Corruption and Whistleblower Policy	Establishes Urban Utilities' commitment to preventing and detecting fraud and corrupt conduct, including the commitment to protect whistleblowers under the UrbanDisclosure Program.	We publish this policy on our intranet.
Public Interest Disclosure Program Procedure	Outlines how Urban Utilities meets its obligations under the <i>Public Interest Disclosure Act 2010 (Qld)</i> . It includes information regarding the UrbanDisclosure Program.	We publish this procedure on our intranet and external website. Our Modern Slavery Response Protocol also includes a link to our UrbanDisclosure Program.
Assessing Compatibility with Human Rights Procedure	Outlines how Urban Utilities will meet its obligations under the <i>Human Rights Act 2019 (Qld)</i> and provides guidance as to when and how human rights should be integrated into Urban Utilities' decision-making processes.	We publish this procedure on our intranet. This procedure is linked to other related documents including our UrbanDisclosure Program.
Procurement procedures	Our procurement procedures provide guidance on the practices, requirements and processes to be applied to Urban Utilities' procurement and contract management activities.	We publish our procurement procedures on our intranet.
Code of Conduct	Outlines the expected behaviours of our employees, Board members, and contractors.	We publish the Code on our intranet. All employees are required to complete the Code of Conduct e-learning module as part of their onboarding process.
Supplier Code of Conduct	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 social and cultural expectations. The Code also includes details of our whistleblower program.	We publish this document on our intranet and external website.
Modern Slavery Response Protocol	Describes the steps to report suspected instances of modern slavery exploitation at a local or international level.	We publish this document on our intranet and external website. Our Modern Slavery Response Protocol also includes a link to our UrbanDisclosure Program.

4.2 RISK ASSESSMENT, MITIGATION AND DUE DILIGENCE

Urban Utilities' procurement framework integrates modern slavery risk assessment and mitigation across the entire procurement lifecycle. This includes early identification of risks during sourcing, onboarding, ongoing monitoring, and enforcement through contractual obligations. Key mitigation strategies involve embedding modern slavery clauses in supplier contracts, conducting due diligence, supported by platforms like Avetta, and promoting transparency through compliance with our refreshed Supplier Code of Conduct. Labour hire and recruitment suppliers are also assessed for ethical recruitment practices. Where risks are identified, additional information is requested to determine if workers are being recruited free from coercion or recruitment-related debt.

These measures ensure suppliers uphold ethical standards and help us proactively manage modern slavery risks throughout our supply chain.

Supplier Due Diligence

In FY25 as part of our commitment to continuous improvement, we introduced the Avetta platform. Avetta plays a crucial role in Urban Utilities' due diligence process by allowing us to gather and verify detailed information about our suppliers' practices related to modern slavery. Through Avetta's platform, suppliers complete self-assessments that align with current legislative requirements, enabling us to detect potential risks early in the process. The information collected is integrated into our wider Supplier Risk and Compliance Program, which supports continuous monitoring, audit preparedness, and ongoing improvement. By utilising Avetta, Urban Utilities strengthens supply chain transparency, minimises exposure to modern slavery risks, and upholds a strong, proactive commitment to ethical procurement throughout the entire supplier engagement process.

Urban Utilities continues to use the Informed365 platform to support supplier assessments and monitor modern slavery risks within our supply chain. In FY25, 218 suppliers were assessed through the Informed365 platform. The average inherent risk of our suppliers calculated by the platform is low.

Contract terms and conditions

To support our efforts in addressing modern slavery risks, we have adopted a suite of contract clauses. These clauses are designed to ensure suppliers are aware of modern slavery risks and actively contribute to our risk mitigation efforts within the supply chain.

The clauses are tiered based on the assessed level of modern slavery risk associated with the goods or services being procured, as well as the supplier's existing controls for identifying, managing, and monitoring these risks.

Our Procurement team is encouraged to apply the most appropriate and robust clauses for each procurement activity, promoting greater supplier accountability and reinforcing our commitment to ethical sourcing.

Supplier Code of Conduct (Supplier Code)

In FY25, Urban Utilities refreshed its Supplier Code of Conduct to strengthen our commitment to engaging with suppliers who operate ethically and uphold high standards of environmental and social responsibility. The updated Code of Conduct clearly outlines the principles and behaviours we expect from all suppliers and their extended supply chains when delivering goods and services to us. It includes explicit expectations around human rights, fair labour practices, and the prevention of modern slavery. As part of our procurement process, both new and existing suppliers are contractually required to acknowledge and adhere to the standards set out in the Code, and to demonstrate their ongoing commitment to compliance. This refresh reflects our continued focus on transparency, accountability, and ethical sourcing, ensuring that our supply chain partners align with Urban Utilities' values.

4.3 TRAINING AND AWARENESS

At Urban Utilities, our employees are essential in identifying and addressing modern slavery risks. Our Modern Slavery Awareness Training, which include knowledge assessments, completed every two years, provides staff with a comprehensive understanding of modern slavery issues within our operations and supply chains. As of 31 June 2025, 745 current and former employees have completed this training. Further to this, internal digital awareness campaigns are displayed on TVs in common spaces in our head office.

Our Procurement team actively engages with PASA (Procurement and Supply Australasia), a leading organisation that hosts a wide range of procurement-focused conferences and events across Australia, New Zealand and online platforms. Several of these events have specifically addressed critical issues such as modern slavery, providing valuable insights and industry best practices to help mitigate risks in supply chains.

In addition to professional development through PASA, our Procurement and Supply Chain team closely monitors global news and media coverage to stay informed about emerging concerns and reported cases of suspected modern slavery. This proactive approach enables us to identify potential risks early and adapt our strategies accordingly.

To further support risk management efforts, we utilise the Avetta Platform to track and review any adverse media associated with our suppliers. This system alerts us to reputational or ethical concerns, helping us to uphold high standards of supplier conduct.

Simultaneously, our Legal team maintains currency with legislative developments relating to human rights and modern slavery. This ensures our practices remain compliant with current laws and allows us to respond swiftly to regulatory changes.

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 (whistleblower program) is an independent service that provides a mechanism for employees, contractors, suppliers, customers, and the broader community to raise grievances, including

potential instances of modern slavery and human rights abuses, and report concerns about illegal, unethical or improper conduct that is contrary to the Urban Utilities Code of Conduct, values and behaviours. Information about our UrbanDisclosure Program is available on our website.

Our Modern Slavery Response Protocol outlines the steps to report suspected instances of modern slavery exploitation both nationally and internationally. This Protocol aligns to and provides awareness of Urban Utilities' UrbanDisclosure Program.

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

4.5 COLLABORATION AND STAKEHOLDER ENGAGEMENT

Collaboration and engagement are central to Urban Utilities' approach to addressing modern slavery. By working closely with our suppliers, business partners, and industry bodies, we have been able to share insights, support the development of good practice, enhance our understanding of modern slavery and its impacts, and contribute to improving transparency across Australia. During this reporting period, we have taken several key steps to strengthen our response:

- Participated in external forums to stay informed about evolving best practices and ensure our initiatives align with industry standards and societal expectations.
- Established a monthly Supplier Due Diligence Forum, bringing together stakeholders from across the business to discuss supplier-related risks, including those associated with modern slavery.
- Created a dedicated full-time Supplier Risk and Compliance Specialist role within the Procurement team. This role focuses on monitoring modern slavery risks, fostering collaboration with internal and external stakeholders, and continuously reviewing and enhancing Urban Utilities' approach to modern slavery.

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.

We monitor and assess the effectiveness of our actions in identifying and managing modern slavery risk through the following:

Activity	Objective	Measure of Effectiveness
Risk assessment and due diligence	<ul style="list-style-type: none"> Understand the risks of modern slavery in our supply chain Increase supplier awareness of modern slavery practices Encourage suppliers to review their operations and supply chain for human rights and modern slavery practices 	<ul style="list-style-type: none"> Number of suppliers invited to complete the Supplier Assessment Questionnaire (SAQ) via our online platform Number of suppliers assessed via our online platform % of supplier spend assessed via our online platform
Training and awareness	Increase awareness of modern slavery practices and support our people to identify signs of modern slavery and how to respond	<ul style="list-style-type: none"> Number of employees who have completed our modern slavery training % of enrolled employees that have completed modern slavery training # of views of our external-facing modern slavery training video Periodic review of training materials and resources to ensure they are relevant, practical and easy to understand
Collaboration and stakeholder engagement	<ul style="list-style-type: none"> Engaging in open dialogue with suppliers, industry and government Collaborating on water industry activities to support the eradication of modern slavery Enhance knowledge and understanding through engagement with human rights experts and worker advocates 	<ul style="list-style-type: none"> Participation in external forums to ensure we keep abreast of best practice initiatives to ensure our initiatives are in line with industry and societal expectations Chairing of the internal Supplier Due Diligence Forum on a monthly basis
Grievance and remediation	Provide employees and third parties with a process to report actual or suspected instances of modern slavery practices or human rights complaints in our operations or supply chain	<ul style="list-style-type: none"> Number of modern-slavery-related whistleblowing alerts raised during the year Number of human rights breaches during the year

Based on the results of these measurements, we adapt and strengthen our actions to continually improve our response to modern slavery. In addition to the above, we regularly review and assess the effectiveness of our policies, procedures, codes and standards.

6. LOOKING FORWARD

Urban Utilities is committed to continually improving our understanding and management of modern slavery risks. Urban Utilities will be focusing on the following key areas for FY26.

Area of focus	Objective for FY26
Modern slavery supplier due diligence	<ul style="list-style-type: none">• Ongoing modern slavery supplier due diligence with a focus on:<ul style="list-style-type: none">– Embedding our Supplier Risk and Compliance Program and expanding the use of the Avetta Platform to replace Informed365.– Exploring ways to increase supplier engagement with the Avetta platform to improve supplier response rates.– Continuing to investigate identified risks and develop corrective improvement plans to address supplier specific risks and governance gaps where required.
Collaboration & Training	<ul style="list-style-type: none">• Continue to collaborate with both internal and external parties to refine our approach to modern slavery and monitor industry innovation and apply best practice.• Our Procurement team is undertaking the CIPS Ethical Procurement and Supply Certification, a globally recognised qualification from the Chartered Institute of Procurement & Supply. This training enhances our understanding of ethical procurement practices, including modern slavery risks, and supports more informed and responsible decision-making across our supply chain.
Continuous improvement	<ul style="list-style-type: none">• Review our modern slavery governance processes to ensure that they are consistent with good practice and evolving legislation.

APPENDIX

MODERN SLAVERY STATEMENT COMPLIANCE CHECKLIST

This Modern Slavery Statement addresses the mandatory reporting criteria of the *Modern Slavery Act 2018 (Cth)* in the following sections.

Mandatory Criteria	Modern Slavery Statement FY24
Identify the reporting entity.	Page 2
Describe the reporting entity's structure, operations and supply chains.	Our structure, operations and supply chains (pages 4 - 6)
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 (page 7)
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 8 - 11)
Describe how the reporting entity assesses the effectiveness of these actions.	Effectiveness of our actions (pages 12)
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) Looking forward (page 13)