



MODERN-DAY SLAVERY POSITION STATEMENT - 2024

ABOUT THIS DOCUMENT

Australia's Modern Slavery Act 2018 defines modern-day slavery (MDS) as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.

Goulburn Valley Water (GVW) is committed to ensuring its supply chains are not linked to modern-day slavery and to addressing and mitigating any risks identified.

In developing GVW's first modern-day slavery position statement, information and support has been sought from suppliers through the utilisation of a targeted Modern-day Slavery self-assessment questionnaire.

The responses from this questionnaire have allowed an expanded risk analysis of the entire supply chain.

ACKNOWLEDGEMENT OF TRADITIONAL OWNERS

GVW recognise Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. Their lore, traditions and customs nurture the land and water, creating wellbeing for all. GVW operates on the lands of the Yorta Yorta and Taungurung people, and GVW respectfully acknowledge them as the Traditional Owners of the land and water on which GVW rely.

GVW recognise their ongoing connection to land, water and community and pay respect to their tribal Elders. GVW celebrate their continuing culture and respect the memory of their ancestors. GVW is committed to honouring Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual connections to land and water. They have managed water and land sustainably over thousands of generations, and GVW value their rich contribution to society and the region's future.



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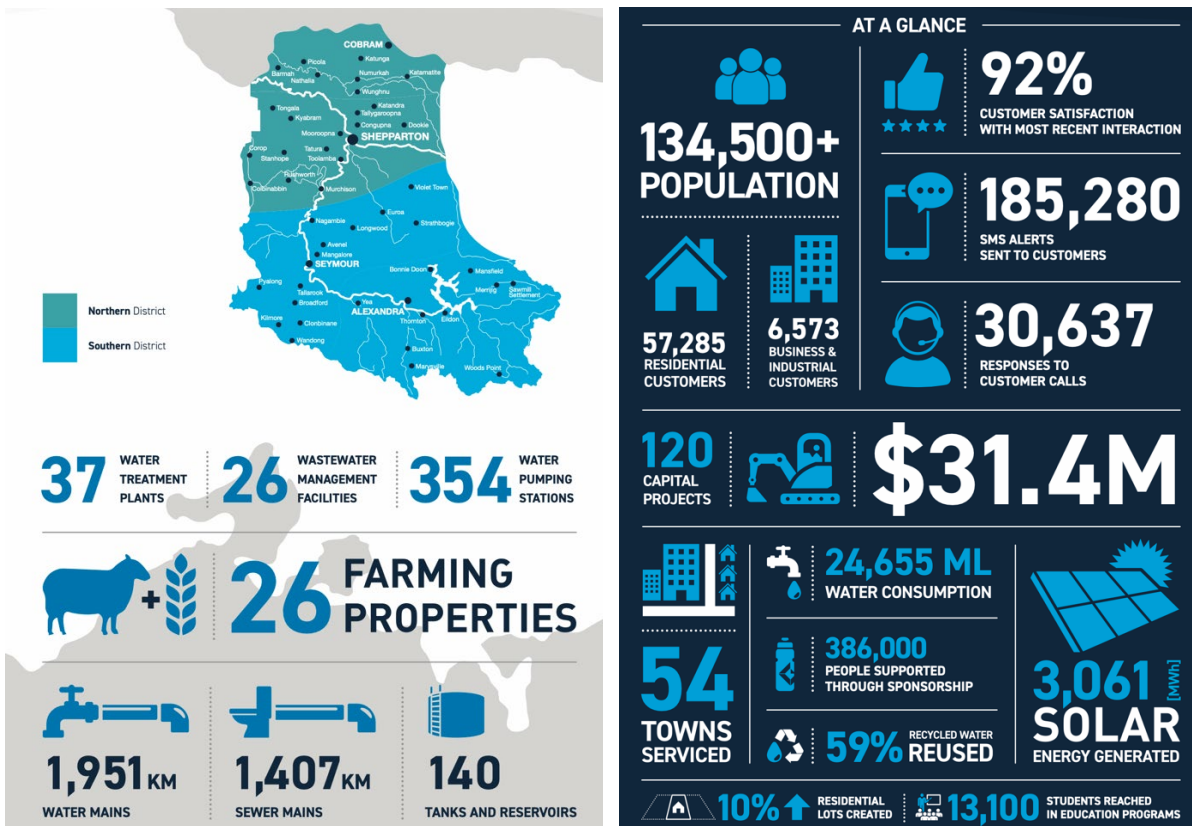
ABOUT US

Goulburn Valley Region Water Corporation, trading as Goulburn Valley Water (GVW), is a state-owned Government Business Enterprise. GVW is a statutory corporation responsible to the Minister for Water and operate under the Water Act 1989 and Water Industry Act 1994.

GVW’s service area stretches from Cobram on the Murray River in the north, to Kilmore in the south, to Corop in the west and to Mansfield at the foot of the Alpine Ranges in the east. Where GVW is responsible for collecting, transporting and treating sewage from customers’ homes and businesses. This corresponds to servicing to more than 134,500 people in north-central Victoria.

GVW follow a range of regulatory obligations set out by the Department of Energy, Environment and Climate Action, Department of Treasury and Finance, Department of Health and the Environment Protection Authority. GVW’s economic activities (pricing and performance) are regulated by the Essential Services Commission and have obligations under the Energy and Water Ombudsman Victoria.

GVW understand the needs of its community may change over time due to population growth and expectations, so GVW is continually anticipating and planning for future growth, and looking at ways it can support its region to ensure communities prosper. This also translates into how GVW needs to operate, as well as support social and environmental outcomes. These expectations also extend to how GVW will manage its modern-day slavery risks.



GVW's VISION

Core Promise

To deliver safe, reliable and affordable water and wastewater services to residential, commercial and industrial customers.

Commitment

In delivering on this promise, GVW is committed to:

- fully understanding and delivering on customers' preferences
- enhancing the liveability and economic wellbeing of communities
- embracing diversity and inclusion, and providing leadership and opportunity

Strategic Priorities

In delivering the core promise and driving the evolution of the business, GVW's key strategic priorities are:

- Customer Centricity
- Digital Optimisation
- Safety Culture
- Leadership and Diversity
- Carbon and Climate

STRUCTURE

GVW's organisational structure consists of a Board of Directors, a Managing Director and General Managers. They are responsible for specialist areas across the business, including Customers and Growth, Finance and Business Services, People Culture and Safety, Planning and Assets, Service Delivery, and Strategy and Performance.

GOVERNANCE AND COMPLIANCE

GVW operates its business responsibly, ethically and with integrity.

As a state-owned enterprise, Goulburn Valley Water abides by, among others:

- the Public Administration Act 2004 (Vic) which takes a comprehensive approach to supporting good public administration in Victoria by:
 - providing a broad definition of the public sector that includes 'public service bodies' (departments and administrative offices), 'special bodies' that have a special relationship with Government and 'public entities'
 - establishing a framework to ensure the effective governance of the whole of the Victorian public sector, to help government manage both the financial and non-financial risks associated with public entities carrying out functions on its behalf
 - enshrining the core and enduring public sector values of responsiveness, integrity, impartiality, accountability, respect, support for human rights, and leadership, which represent the defining characteristics of the behaviour required of all public sector employees.

- the Financial Management Act 1994 (Vic)
- the Principles of Probity (integrity, fairness and honesty)
- the Codes of Conduct issued by the Victorian Public Sector Commission (VPSC)
- GVW's own internal business controls, policies and procedures these include: Conflicts of Interest, Fraud and Corruption, Public Interest Disclosure, Confidential information, Discrimination and sexual harassment, Health, Safety and Environment, and Financial Reporting

PROCUREMENT, DUE DILIGENCE AND SUPPLY CHAIN ASSURANCE

GVW has and continues to develop the policies and procedures that underpin supply chain governance. These include the focus areas of procurement, purchasing, social outcomes, probity, risk, and contract management.

GVW's Procurement and Sourcing Procedures are in alignment with the Victorian Government Purchasing Board requirements for the procurement of goods, services and works, which, in turn, are underpinned by the Victorian Government's Supplier Code of Conduct.

GVW has a high use of the existing Victorian Government panels and arrangements, both mandatory and optional. The proponents on the panels and arrangement have to declare their own MDS positions and key risk areas (if applicable).

Supply Chain

In undertaking the development of the initial Position Statement, GVW has identified the locations of its suppliers within Australia as well as its international suppliers. GVW suppliers are mostly Australian based with less than 0.01% being international suppliers.

Modern-day Slavery risks in operations and supply chain

From the perspective of tier 1 supply chain, GVW's Modern-day Slavery risk exposure is considered low. This is primarily due to the low level of off-shore expenditure.

In the creation of GVW's first Modern-day Slavery Statement an assessment of tier 2 supply chain was conducted. This has commenced with the distribution of a Modern-day Slavery self-assessment questionnaire to understand where suppliers source their goods and services from, and the risk potential therein. The information provided, and additional research, identified that the tier 2 supply chain comprises of 140 potential countries of supply.

GVW uses a heat map tool to assess these tier 1 and tier 2 suppliers for sustainability risks and opportunities, we sought to understand the hotspots (greater likelihood of sustainability issues) within the supply chains. These supplier groups are monitored for new and emerging modern slavery risks periodically.

Relevant Modern Slavery Risk Factors

GVW recognise that there is a possibility of modern slavery risk in its supply chain given the diversity of regions suppliers procure from and the wide range of products sourced. The review of publicly available information such as the Walk free – Global Slavery index, suggests the following modern-day slavery risk factors may be present in GVW's supply chain.

Actions to assess and address identified risks including mitigations, controls and remediation

The Procurement function will be undertaking a review to ensure a more integrated and robust strategic sourcing approach. This will be a primary focus of their work for FY 2024 - 25.

To achieve this:

- GVW's procurement function will be engaging in meaningful and respectful conversations with the suppliers who have volunteered information through the self-assessment questionnaire that identifies them, or their supply chains, as having a Modern-day Slavery risk potential for their operations or in their supply chain.
- The self-assessment questionnaire will also form part of all supplier onboarding requirements, going forward.
- In addition to integrating Modern-day Slavery into procurement and supplier management activities, Modern-day Slavery will also be incorporated into the Corporate Risk Framework.

Assessment of the effectiveness of current actions

The effectiveness of current controls will be largely based on the willingness, and/or ability of suppliers to determine 'country of origin' for the goods and services they provide GVW. This is largely due to the predominance of 'local' suppliers.

Continuous improvement – FY 2025 – 26, and beyond

As part of GVW's ongoing commitment to addressing Modern-day Slavery, GVW will be undertaking the following actions to further improve its understanding of its supply chain and its potential for Modern-day Slavery Risks.

- Inventory including electrical and mechanical parts
To improve visibility of country of origin/manufacture, this information requirement will be added to the inventory system. This will provide a database of specific inventory origins and allow engagement with specific suppliers to more effectively manage Modern-day Slavery risk profile.
- Infrastructure Projects
Where specific MDS risks are identified within infrastructure projects GVW will engage directly with its suppliers to ensure the appropriate due diligence is



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undertaken. This will include an appropriate GVW procurement strategy, MDS risk assessment and supplier declaration.

Mapping against the mandatory criteria

Mandatory Criteria	Page Number(s)
Identify the reporting entity.	4
Describe the reporting entity's structure, operations and supply chains.	4, 5
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6, 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.	7
Describe how the reporting entity assesses the effectiveness of these actions.	8
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	N/A
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A

PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the principal governing body of Goulburn Valley Water as defined by the Modern Slavery Act 2018 (Cth).

Approved by the Goulburn Valley Water Board of Directors on 11 December 2024

Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member of Goulburn Valley Water as defined by the Act:

M. Stone AM
Board Chair | Goulburn Valley Water