



2023-2024

Modern Slavery Statement

Letter from the WaterNSW Board of Directors

The Commissioner
Attorney-General's Department
Australian Government
26 November 2024
Submitted online at <https://modernslaveryregister.gov.au/>

Dear Commissioner

On behalf of WaterNSW, I am pleased to submit our Modern Slavery Statement (Statement) for the financial year ending 30 June 2024, prepared in accordance with the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW).

This Statement applies to and describes the reasonable steps taken by WaterNSW, and its wholly owned subsidiary, WaterNSW Infrastructure Pty Limited (the Group), to mitigate modern slavery in the Group's operations and supply chains.

Consistent with our organisation's core values of Value our People and Drive Change, WaterNSW fully supports the objectives of the *Modern Slavery Act*. WaterNSW opposes all forms of slavery and forced labour in our operations and the operations of our suppliers.

The Statement was approved by the Board of WaterNSW at its November 2024 board meeting.

Yours sincerely,



Peter Duncan AM
Chair



About WaterNSW

Who we are

We are the people taking care of the state's water at the source – capturing, storing, delivering.

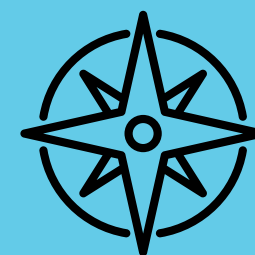
With 41 major dams and hundreds of waterways across the state, we play a vital role at the source of the state's water, delivering two thirds of all water used in NSW.

WaterNSW is a State-Owned Corporation and one of the main government agencies tasked with managing water in NSW. We follow the government rules and regulatory frameworks, implementing the rules to deliver water when and where it is needed.

Our people are dam safety specialists, operators, engineers, catchment protectors, water quality experts, hydrologists, scientists, and licensing and customer service experts, amongst a range of other expertise.

WaterNSW has a number of main functions involved in capturing, storing and delivering water:

- We manage dams like Burrendong, Chaffey and Warragamba, and protect the Greater Sydney drinking water catchment.
- We supply water to customers, communities and the environment.
- We build, maintain and operate essential infrastructure.
- We service customers – from farmers to local councils – providing support for water licensing and approvals, trades and billing, to meet their water needs.
- We own and operate the largest surface and groundwater monitoring network in the southern hemisphere.



Our purpose

Water, delivered when and where it matters.



Our vision

To support the resilience of NSW communities through our leadership in delivering water services, for generations to come.

Keepit Dam

Our strategic priorities

To deliver on our purpose and realise our vision, we have five strategic priorities that are targeted to achieving our purpose and vision for the future and meeting the needs of NSW water users and communities.

- **Delivering operational excellence:** we have deep expertise in technical and operational elements of water delivery. We will continually extend this expertise to deliver safe, reliable, and affordable water management and delivery.
- **Developing our people and capabilities:** we will develop and employ a diverse, high performing workforce. One that is responsive to the needs of our customers and the communities we serve.
- **Respected by the customers and communities we serve:** we aim to be even more trusted to support the social, cultural, and economic prosperity of our customers and communities. We will deliver this through transparent decision making and having a greater community presence.
- **Working together in partnership:** we are committed to working together in partnership with our stakeholders to manage sustainable, secure, and healthy water resources.
- **Building a sustainable future:** we will play our part in creating a more resilient water system. One which enables thriving communities and healthy ecosystems, whilst reducing our environmental footprint – so we don’t cost the earth.

Our values

Our values are the principles and behaviours that drive us to succeed as both teams and individuals at WaterNSW. They reflect who we are and what we represent.

Our values support us to achieve a high-performance culture. They support our shared vision and enable us to deliver quality outcomes to our customers, communities and shareholders. We live our values and are measured by them.



We’re expert operators

WaterNSW operates the state’s dams, capturing and storing water, and then supplying it ready for distribution – for the environment, agriculture, industry and the community.

The water we supply is used by more than 8 million people across NSW. Our customers range from small family businesses to farmers, irrigators, councils, utilities, industry and the environmental water holders like the State and Australian Governments who use water to protect our ecosystems and keep rivers flowing.

Every day we operate our assets and manage water responsibly to meet the needs of our customers and communities, now and into the future.



Key

- Dam
- Dam with Office
- Office
- City/Town

Regulated river valleys where WaterNSW manages dams that supply water to regulated river customers.

WaterNSW also services groundwater users and unregulated water uses across the state, providing customer services including licensing and approvals under the Water Administration Ministerial Corporation (WAMC).

Our corporate governance structure

WaterNSW is constituted as a statutory State-Owned Corporation (SOC) under the *State-Owned Corporations Act 1981* (NSW) and under the *Water NSW Act 2014* (NSW).

WaterNSW operates under an Operating Licence granted by the Independent Pricing and Regulatory Tribunal (IPART).

WaterNSW Infrastructure Pty Ltd is a wholly owned subsidiary of WaterNSW.

This Modern Slavery Statement covers both entities of the WaterNSW Group.

We are regulated by several regulators, including but not limited to:

- The IPART for operating licence compliance and customer pricing, and
- The Natural Resources Access Regulator (NRAR), for compliance with the regulatory framework for water including water management rules.

Our governance structure:

Voting Shareholders / Shareholding Ministers of WaterNSW

- NSW Treasurer
- NSW Minister for Finance
- Shareholders and share capital established under *20H State Owned Corporations Act 1989* (NSW)

Portfolio Minister of WaterNSW

- NSW Minister for Water
- Role of Portfolio Minister established under *20I State Owned Corporations Act 1989* (NSW)
- May give directions to WaterNSW in consultation with the Treasurer or shareholding ministers (subject to the *State Owned Corporations Act 1989* (NSW), *WaterNSW Constitution*, *Water NSW Act 2014* (NSW)).

WaterNSW Board of Directors

- Directors are appointed by the voting shareholders (section 8 *Water NSW Act 2014* (NSW))
- Board complies with NSW Treasury Policy TPP 17-10: *Guidelines for Governing Boards of Government Businesses*
- Accountable to the Voting Shareholders (see section 10 *State Owned Corporations Act 1989* (NSW) and the *WaterNSW Constitution*).
- Subject to the direction of the Portfolio Minister (*WaterNSW Constitution* clause 5.5 (d)(i)).

WaterNSW

Statutory State-Owned Corporation – Parent Entity

- Established under the *Water NSW Act 2014* (NSW) and Schedule 5, *State Owned Corporations Act 1989* (NSW).
- Functions specified in *Water NSW Act 2014* (NSW) and pursuant to Operation Licence (issued by IPART).
- Subject to *WaterNSW Constitution*.

WaterNSW Infrastructure Pty Ltd

(controlled entity – wholly owned subsidiary)

Established 5 November 2018 under the *Corporations Act 2001* (Cth) as a wholly owned subsidiary of WaterNSW to provide bulk water transmission services for the supply of raw water to Essential Water in Broken Hill as the local water provider.

Operates under the commercial disciplines of the NSW Government's Commercial Policy Framework.

Introduction

WaterNSW is committed to acting ethically, with integrity and transparency in all our business dealings, and to implementing effective systems and controls to safeguard against any form of modern slavery taking place within our operations or our supply chains.

Our modern slavery initiatives are part of our wider 'Building a Sustainable Future' strategic priority that helps us achieve this purpose. WaterNSW will not tolerate any form of human rights abuse within our business or supply chains.

This statement covers our operations and supply chains and looks at the steps we are taking to combat the risk of modern slavery and human trafficking within our organisation.

No instances of modern slavery have been identified in our operations or supply chains during FY24, nor have we received any reports of potential instances of modern slavery from our staff, customers, or suppliers.

We are not complacent and remain committed to keeping our approach under continual review.

Highlights of what we achieved during the 2023-24 Financial Year



Launched a dedicated modern slavery section on our intranet site "the Source" ensuring that all employees remain aware of the measures we are taking to address the risk of modern slavery and understand their own responsibilities.



Established a modern slavery communication plan with the objective to increase the understanding and importance of eradicating modern slavery at work and in our personal lives.



In May 2024, hosted a dedicated State-Owned Corporation event with the NSW Anti-slavery Commissioner to hear of his ambitions and priorities for modern slavery – with a focus on identifying and mitigating modern slavery risks responsibilities.



Reshared our Supplier Code of Conduct to remind suppliers of expectations when conducting business with WaterNSW and to provide details of the Whistleblowing Solution ("Your Call") used to receive and manage reports of possible breaches with impartiality and confidentiality. 100% of our contracted suppliers are signed up to our Supplier Code of Conduct.



77% positive perception of employee sentiment towards reporting unethical behaviour in our Pulse employee engagement survey – down 1% from 2023.



Continued supplier engagement and awareness through risk assessment questions within the tender process, updated contract templates and modern slavery information made available on our website.



Modern Slavery section of the Code of Conduct training reviewed and updated in consultation with the eLearning Team.



Collaborated within the NSW water sector and assessed publications from the NSW Anti-slavery Commissioner to foster responsible business practices, and show leadership in identifying and addressing modern slavery in supply chains.



Continued our commitment to ensuring our people are adequately informed about modern slavery and their role in identifying and mitigating risks.

Governance



Our established Modern Slavery Working Group drives the development and delivery of our approach across WaterNSW. Representatives from across the business ensure our policies, processes, and practices are aligned to eliminate the risk of modern slavery. The Working Group also engages with the business to produce the Modern Slavery Statement on behalf of WaterNSW. It includes senior leadership representation from core functions key to driving change including Procurement, Audit, Risk and Compliance, Safety, People and Culture and Legal. The Executive Manager Finance, Legal & Risk has overall responsibility for our approach to modern slavery and is provided with updates on our approach and progress against our action plan.

The WaterNSW Board and Audit & Risk Committee provides rigorous challenge to management and ensures WaterNSW maintains an effective risk management and internal control system. They oversee and endorse the Modern Slavery Statement for the Board’s approval annually.



Our operations

Our values and policies are the foundation for how we operate. They apply to everyone employed by, or acting on behalf of, WaterNSW. The WaterNSW Code of Conduct outlines the standard of behaviour expected of employees, contractors and directors, working for and on behalf of WaterNSW. A section on modern slavery is included in the online Code of Conduct learning, providing clear guidance on expectations towards mitigating and reporting risks. The Code of Conduct is supported by other relevant policies, procedures, and industrial instruments. The WaterNSW Code of Conduct was last updated in February 2024 and changes included expanded options for reporting wrongdoing.

The Code of Conduct includes a high-level explanation of modern slavery, a quick quiz, and a link to the WaterNSW Modern Slavery Statement. The training is mandated for all employees and contractors on commencement, then again every two years. The Code of Conduct training completion rate for eligible employees in FY24 was 86%.

Our process for reporting wrongdoing encourages any concerns to be raised.

We continue our contract with “Your Call Whistleblowing Solutions” (Your Call) to receive and manage reports of possible breaches with impartiality and confidentiality. This option allows employees and contractors, or anyone else who uses the service, to remain completely anonymous, or if they choose to, they can identify themselves to Your Call only, or identify themselves to both Your Call and WaterNSW.

Each year, through our annual employee engagement survey, we ask our employees to respond to the survey question: “I can report an instance of unethical conduct without fear of retribution.” Whilst the question is general in nature, it does capture

employee sentiment towards reporting unethical behaviour, which would include issues relating to modern slavery. This year, there was 77% positive perception in response to this question, down 1% from 2023.

Our people

Safety is our number one priority, with our focus on both physical and mental health and wellbeing. The nature and locations of many of our operations mean that we operate in potentially hazardous environments, so constant vigilance is required to deliver our safety objectives.

We promote the idea of ‘chronic unease’, that is, encouraging a heightened sense of anticipation and vulnerability to maintain our focus on safety. Safe4Life is our overarching safety brand. It comprises a campaign and supporting programs to capture our commitment to zero harm at work and home, and reflects on an employee’s ‘top 4’ - the things that are most important to them and the reason why it’s vital they get to go home safely every day.

One of our values is “value our people”, that is, we keep people safe, treat them with respect and grow and develop our people. Key to this is our commitment to inclusion and diversity. We know that an inclusive and diverse workplace improves employee wellbeing and engagement, enhances creativity and innovation, and enables a better connection with our customers and the communities we live and work in.

- Our Inclusion & Diversity Program:
- Promotes awareness, understanding and appreciation of inclusion and diversity;
 - Creates a culture of belonging where our people feel valued and respected; and
 - Encourages diverse representation of our workforce to reflect the communities in which we operate.

We believe our overall risk of modern slavery within our workforce is low due to the nature of what we do, and the compliance checks we have in place. As of 30 June 2024, 93% of our employees are permanent and 7% are term contracts. Our use of contingent labour is low (equivalent to 3% of our total workforce). It is a requirement under our enterprise agreement that any labour hire worker be paid no less than the amount that would otherwise be paid to a WaterNSW employee performing similar work.

As part of our recruitment and onboarding process, we conduct thorough integrity checks for all workers, including temporary employees who join our business.

- These include, but are not limited to:
- Right to Work (that is, they are legally able to work in Australia);
 - Occupational medical assessment;
 - Criminal background check; and
 - Professional qualifications and education.
- Passing these checks is a pre-requisite before an employee can start work with us. For our contingent labour, our service provider completes integrity checks on our behalf, except for criminal background checks which are undertaken by WaterNSW.
- Any concerns are flagged and addressed with employees and the hiring manager directly and a risk assessment is conducted to further ensure suitability of hire.

Our supply chains

We remain committed to working collaboratively with our suppliers to understand and support the development of their approach to identifying and addressing the risk of modern slavery within their operations and across their supply chain. Our direct supplier contracts are predominantly held with Australian companies, with all suppliers, irrespective of industry, size and location, expected to meet our standards set out in the Supplier Code of Conduct. Our supply chains cover a wide range of products and services procured from third-party suppliers and we have systems in place to identify and assess potential risk areas.

Our standard procurement processes include a variety of checks and reviews to help ensure that the suppliers we engage with have the capability and capacity to comply with our policies and commercial terms. We also check that our contracts undergo appropriate legal assessment and have appropriate modern slavery contract clauses in place.

We regularly look to improve our supply chain processes. Up until March 2024, we used Beroe – Know Your Supplier Risk Management Solution which allows the Procurement team to assess our suppliers across key risk and compliance parameters. These parameters include human rights violations, adverse media mentions, corruption, fraud, criminal regulatory issues, and financial risk.



We operate a well-established risk management framework, underpinned by standardised tools, practices, a risk appetite assessment and risk management methodologies to ensure consistency across WaterNSW. Through this comprehensive framework, we review our organisational level modern

slavery risks quarterly, including the level of risk which modern slavery may present to us. We review in detail the risk, causes, consequences and most importantly, controls we can apply to mitigate the risk from occurring. The outcome of this review is recorded and considers the reputational and financial risk impact to WaterNSW in the event of an incident occurring. During 2023, we undertook a risk appetite assessment, recognising that there will be some forms of modern slavery occurring within the supply chain. The assessment established that there are some forms of modern slavery whereby we would look to work with the supplier, and their supply chain, for example to improve working conditions. However, we recognised some forms of modern slavery risk that would not be tolerated, for example where a supplier has acted illegally the risk appetite would be zero.

We believe that the key risk indicators used to monitor the effectiveness of the controls applied are satisfactory and the risk to business is low. On completion of each quarterly update, the risk register is reviewed and updated, and results reported to the Executive team and the Board Audit and Risk.

This regular, ongoing assurance is another step we take to thoroughly review and minimise the likelihood of a modern slavery occurrence.

Risk mapping our supply chain

We continue to risk map our supply chain through several processes. All suppliers are assigned a category based on the materials or services which we predominantly procure from them. Each category is managed by a Category Manager, including the supplier approval and onboarding process. Suppliers are mapped to understand their base location and the location from which the products and services are sourced. The majority of our suppliers are based within Australia.

Our spend profile 2023 – 24 financial year

We are reliant on over 1,000 suppliers to help us deliver our business operations and spent \$265.4 million¹ through our supply chain during the FY24 reporting period.

Due to its complexity and breadth, our supply chain is the element within our organisation that poses the highest risk of modern slavery. Using guidance from NSW Procurement and their Modern Slavery Risk Assessment framework, the following categories continue to be our highest risk areas:

- Construction and asset maintenance
- ICT and communications
- Property and facilities management

¹ PowerBI report – Invoice spend by category



Category of spend	Total value \$m	% of spend	Modern slavery risk
Civil construction	\$83.9	32%	Construction labour, raw materials e.g. steel, concrete
Asset maintenance and water quality	\$39.4	15%	Asset maintenance raw materials
Information technology and communications	\$29.4	11%	Laptops, computers, and mobile phones
Engineering services	\$32.8	12%	Raw materials
Property, fleet and utilities	\$28.1	10%	Cleaning and security services labour hire
Professional services	\$25.2	9%	Excessive hours (graduates)
Contractor and temporary labour	\$14.9	6%	Contingent labour hire
Insurances	\$7.3	3%	
Other	\$4.4	2%	
Total	\$265.4		

Civil construction: The vast majority of the \$83.9m spend during the year was on construction works (\$81m) of which \$74.6m was with our construction partners under the Asset Renewal and Replacement program. There is also a small amount of spend (less than \$2m) on capital equipment purchases.

Spend with our construction partners under the Asset Renewal & Replacement framework accounts for 89% of our construction work spend. Supplier performance review meetings are held monthly with our partners and provide an opportunity to collaborate on the identification and management of modern slavery risks.

Asset maintenance and water quality: Approximately 50% of spend in this category falls under Infrastructure Asset Repairs and Maintenance. This area has similar risks to the construction category, however, due to the considerable geographic spread of our assets we engage over 300 suppliers. There is an initiative to further develop panel arrangements for the delivery of asset maintenance which should help streamline the number of suppliers, so that we can work together to identify and mitigate the risk of modern slavery occurrence.

Information technology & communications: The \$29.4m information technology spend is made up of ICT professional services (\$10.6m); software (\$12.4m); telco (\$3.7m); hardware (\$2.7m). Generally, we utilise the NSW whole of government arrangements for software, telecommunications and hardware where modern slavery risk is considered during the tender process. However, the WaterNSW legal team may review and strengthen contract clauses if required.

A digital professional delivery services panel was established in FY24 that has significantly reduced the number of digital delivery service suppliers and will create the opportunity for more collaboration on addressing modern slavery supply chain risks.

Property, fleet & utilities: The majority of the \$28.1m spend is on rent, rates, security, cleaning, and waste management (\$16.6m); we spent \$7.1m on fleet, servicing, repairs, and fuel, etc. and \$4.4m on electricity.

We continue to use the NSW Government cleaning contract which ensures that applicable employment guarantees to cleaners are in place, ensuring their welfare. We are finalising our security tender leveraging suppliers listed on the NSW

Government Integrated Security Contract that ensures compliance with the NSW Government's Procurement Policy Framework, modern slavery objectives and *Fair Work Act 2009*. The contracted supplier will be engaged under a WaterNSW contract that will strengthen modern slavery related terms and conditions and the supplier will need to accept our Supplier Code of Conduct that outlines our expectations.

Contractor & temporary labour: WaterNSW use the contractor central model which provides greater visibility of our contingent labour hire supply chain. Quarterly business reviews take place with our managed service provider, Kelly OCG, to better assess and address our modern slavery risk collaboratively. Integrity checks continue to be carried out prior to the engagement of a contingent labour hire.

Reporting concerns

Our Supplier Code of Conduct and the WaterNSW website each contain guidance on how to report any concerns that our suppliers, sub-contractors or their staff may have about modern slavery.

There are various methods that our suppliers can use to raise concerns, including:

- Emailing our procurement mailbox, which is monitored by our procurement governance team procurement@waternsw.com.au
- Contacting our Customer Service Centre on 1300 662 077
- Contacting an appropriate manager or a member of the procurement team
- Using the “Your Call” website www.yourcall.com.au/report
- Using the “Your Call” hotline 1800 751 298

“Your Call” is operated by Your Call Whistleblowing Solutions, an independent external organisation which provides details of each report to our General Counsel, ensuring that each report is reviewed at appropriate levels within WaterNSW, with each case then being investigated by suitably experienced individuals with support from our Legal, Risk, HR or Procurement teams.

Reporters have the option to remain anonymous and can provide information and evidence about their concerns via Your Call's website if they are concerned about revealing their identity to the investigation team.

A background image showing two men in work attire walking on a dirt path. The man on the left is wearing an orange high-visibility shirt, blue trousers, and a brown hat. The man on the right is wearing a blue shirt, a yellow high-visibility vest, blue jeans, and a blue cap. They are walking towards the camera. In the background, there is a body of water, some trees, and a red car parked on a grassy area.

What we have done to address our modern slavery risks within our operations and supply chain during 2023-24

Raising awareness

We have always valued the importance of educating employees to identify any instance of modern slavery and escalate concerns through the appropriate channels. Training continues to be received positively, and we continue to provide it to all those completing our online Code of Conduct training. More in-depth modern slavery awareness is available for employees through our modern slavery e-learning module. It is currently assigned as mandatory to a number of key positions across the organisation and is recommended for project managers and all other staff who would like to know more.

In addition to a 'lunch and learn' session held in 2023, WaterNSW hosted a webinar with the NSW Anti-slavery Commissioner Dr James Cockayne who spoke about changes to public procurement practice designed to address modern slavery risks. The invitation was extended to all NSW State-Owned Corporations who were able to join the webinar and hear from the Commissioner.

He provided an insightful session which was recorded and made available to staff who could not attend the live event.

The Anti-slavery Commissioner for New South Wales, Dr James Cockayne is the first commissioner appointed to the role and his 5-year term commenced on 1 August 2022. The Anti-slavery Commissioner's functions include:

- advocating for and promoting action to combat modern slavery
- identifying and providing assistance and support for victims of modern slavery
- support to and oversight of NSW public procurement efforts to remove products of modern slavery from supply-chains

- issuing codes of practice and maintaining a public register related to efforts to address modern slavery risks in supply-chains
- raising community awareness of modern slavery.

Our procurement, corporate property & services manager completes the CIPS Ethical Procurement Module annually, which includes a focus on human rights, exploitation and forced labour as part of her professional accreditation.

The Working Group prepared information on modern slavery for our intranet site - 'The Source', to help raise awareness across WaterNSW and to complement our Code of Conduct and modern slavery eLearning modules.

The intranet site and modules share risk indicators and factors to consider when making a purchase or procuring goods and services, as well as outline the actions WaterNSW are taking to help mitigate the risks of modern slavery.

We shared contact details for our Working Group so members could receive feedback and comments, or answer any questions staff may have on modern slavery.

Evaluating our performance

We have established Key Performance Indicators (KPIs) to help us to monitor and report on the effectiveness of our actions.

Key KPIs for 2023/24

KPI	Target	Progress
Speaking up without fear of retribution % favourable responses from employees for empowerment/ autonomy	90%	77% of staff who completed the staff pulse survey responded positively to questions around empowerment / autonomy. Along with our embedded values, we believe this is evidence of a culture where people feel comfortable to challenge and raise concerns, however, there is more work to do to achieve our target.
Modern slavery awareness Company wide targeted training	95%	89% of eligible staff have completed the Code of Conduct Modern Slavery training against the target of 95% for the year 2023-24.
Non-compliant suppliers	0%	We have no reported instances of modern slavery with any of our suppliers
Suppliers with suspected instances of modern slavery	0%	There were no suppliers with suspected instances of modern slavery reported
Supplier due diligence and adherence Supplier Code of Conduct	100%	100% of our contracted suppliers have accepted and signed up to our Supplier Code of Conduct during tender response. This is a testament to our enduring relationships with our suppliers, who are committed to reducing risks we face as a business, for the benefit of our wider stakeholders.



Supply chain risk management

We acknowledge that the risks of modern slavery may be increased in some of our supply chains as a result of the geographical location of some suppliers, our areas of operation, and the source of materials used in products supplied to us. For example, around 60% of the \$6 billion spent annually on construction materials in Australia are imported from China, according to the Australian Construction Industry Forum. We acknowledge that we lack visibility in overseas markets, and this carries additional risks of modern slavery especially in secondary levels of our supply chain and source

materials used on our construction projects or in the provision of goods and services. To further assist in the management of potential risk, we used the NSW Government Modern Slavery Risk Assessment framework to undertake a supplier risk assessment and heat mapping process. This resulted in 5% of spend shifting from medium to high risk and 1% shifting from medium to low risk. The Modern Slavery Risk Assessment focussed on four risk indicators and risk factors to consider:

Modern slavery risk indicators	Sector and industry risks	Product and services risks	Geographic risks	Supply chain model risks
Risk factors	<ul style="list-style-type: none">• Informal unregulated sectors of industries• Little visibility over lower tier suppliers• Seasonal work• Low pay dangerous work	<ul style="list-style-type: none">• Product or service often involving lower wages and manual labour	<ul style="list-style-type: none">• Location with poor governance• Weak rule of law• Conflict• Corruption• Displacement• State failure to protect human rights• Socio economic factors such as poverty or widespread discrimination	<ul style="list-style-type: none">• Larger and more complex supply chains• Sub-contracting and use of labour recruiters• Recruitment fees may be charged
Examples	Extractives, textiles and fashion, fishing, electronics, cleaning and agriculture	Products: bricks, cotton, rubber Services: cleaning	Freedom House scores over 200 countries considering access to political rights and civil liberties	Exorbitant recruitment fees that keep workers locked in debt bondage

Up to March 2024 we monitored 190 suppliers within the Beroe Supply Chain Risk Monitoring tool which account for 80% of our spend. The remaining 20% of spend is either with other NSW Government Agencies (10%) or tail end spend with small suppliers mainly in the regional areas (10%). These areas of spend were not captured within

the Beroe solution. The monitoring highlighted no modern slavery risks but did alert us to suppliers who were under financial stress so that we could proactively manage the situation. During FY25, we will be retendering for a new supply chain risk solution.

Summary of key actions taken during FY23-24

What we said we would do	What we have achieved
<ul style="list-style-type: none">• Build our employees knowledge and educate ourselves as advisers	<ul style="list-style-type: none">• Hosted a webinar with the NSW Anti-slavery Commissioner for WaterNSW staff and extended the invitation to all State-Owned Corporations across NSW• Working Group members and the Procurement team attended training on the NSW Government Reasonable Steps Framework and other webinars on modern slavery to understand emerging issues and actions being taken by other organisations
<ul style="list-style-type: none">• Keep staff engaged along our modern slavery journey	<ul style="list-style-type: none">• Published modern slavery pages on our intranet site to increase staff awareness and to provide Working Group member contact details• Published what WaterNSW is doing to reduce the risk of modern slavery within our operations and supply chains on our intranet• Established a communication plan for modern slavery to increase staff awareness and supplier engagement• Intranet articles and our internal social network over Easter highlighted cocoa production as one of the highest risk industries for forced and child labour. Our “Be a dam good consumer” article also offered tips over the holiday season on how to ensure personal purchases do not contribute towards modern slavery risks.
<ul style="list-style-type: none">• Consider how we continue to work with our suppliers around compliance and risk of modern slavery	<ul style="list-style-type: none">• Removed timelines as a standard tender evaluation criteria that may create a situation for modern slavery to occur i.e. labour forced to meet shorter delivery timescales• Supplier Code of Conduct refresh communicated to all suppliers registered within our financial management system
<ul style="list-style-type: none">• Ensure that all relevant activities across WaterNSW are captured for reporting and audit purposes	<ul style="list-style-type: none">• KPI's reviewed and considered fit for purpose for the next 12 month reporting period• Organisational level modern slavery risks reviewed quarterly, including the level of risk which modern slavery may present

Areas of focus for the next reporting period

We know we are on a journey of continuous improvement and have identified several areas of focus for the year ahead in addition to our business as usual measures to identify and address modern slavery.

- Carry out a gap analysis against the NSW Anti-slavery Commissioner’s Shared Implementation Framework, specifically the Guidance on Reasonable Steps.
- Develop and implement a WaterNSW Modern Slavery Policy linked to WaterNSW Risk Appetite Statement.
- Through our Modern Slavery Working Group, develop a plan to address the gaps identified when we compare WaterNSW against the Guidance on Reasonable Steps.
- Continue the implementation of our communication plan and activities to help raise awareness of modern slavery.
- Provide refresher modern slavery awareness training for contract managers during the implementation of our contract management assurance program.
- Seek ongoing guidance and best practice to enhance our proactive employee and supplier checks where required.
- Retender our supplier risk management solution to replace Beroe – Know Your Supplier.



Cataract Dam

Conclusion

We continue to take steps to meet the requirements of the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW) and to upskill our employees and supply chain in mitigating modern slavery risks.

Over the last five years we have followed best practice guidance to create our action plan, develop training pathways and embed clear expectations within our business and supply chain. Our approach to modern slavery is supported by robust policies, procedures and supports our wider commitment to provide a safe, inclusive and fair place to work.

We welcome the publication of the Anti-slavery Commissioner's Public Procurement Shared Implementation Framework that provides us with clear expectations on which to base our FY25 modern slavery action plan.

Despite our progress we continue to take our responsibility to help eradicate modern slavery in our business and supply chain seriously. We recognise the evolving changing nature of the modern slavery landscape and, as such, continually review and improve our approach.



For more information

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