

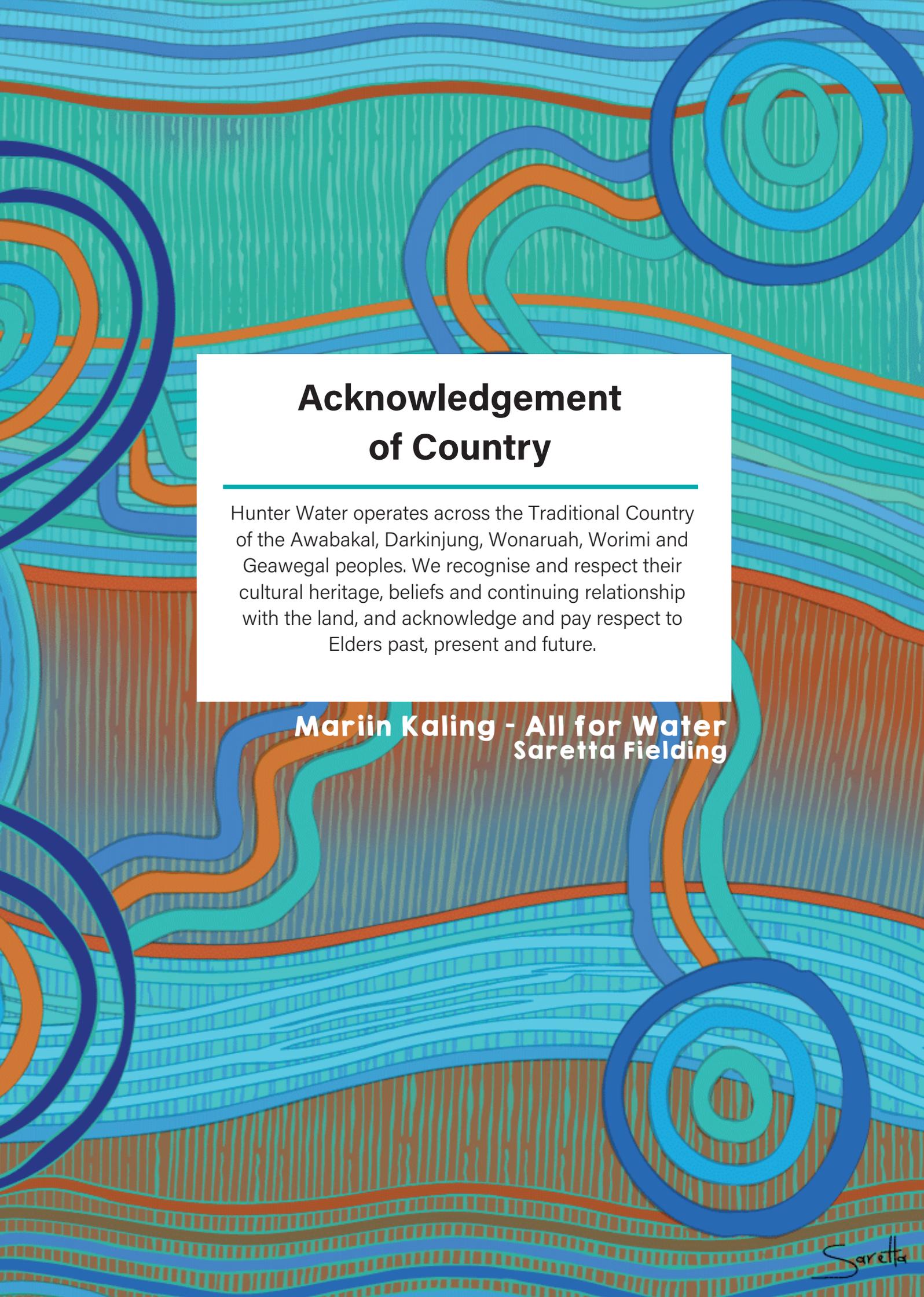
# HUNTER WATER

# MODERN SLAVERY STATEMENT

## 2021-2022



commercial-in-confidence



## Acknowledgement of Country

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Hunter Water operates across the Traditional Country of the Awabakal, Darkinjung, Wonaruah, Worimi and Geawegal peoples. We recognise and respect their cultural heritage, beliefs and continuing relationship with the land, and acknowledge and pay respect to Elders past, present and future.

**Mariin Kaling - All for Water**  
**Saretta Fielding**

# Table of Contents

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<b>Section No.</b>	<b>Section</b>	<b>Page No.</b>
1	Hunter Water	6
2	Our Values & the United Nations Sustainable Development Goals	7
3	Modern Slavery Risks	8
4	Our Modern Slavery Action Plan	10
5	Collaborative Action	12
6	Case Studies	13
7	Our Effectiveness	15
8	Our Concluding Comments	16
9	Annexure A: Mandatory Reporting Requirements	17

# Our commitment

Hunter Water serves a population of almost 600,000 people in homes and businesses across the Lower Hunter region. We are a vertically integrated water utility – an operator and retailer from catchment to tap, sink to waterway.

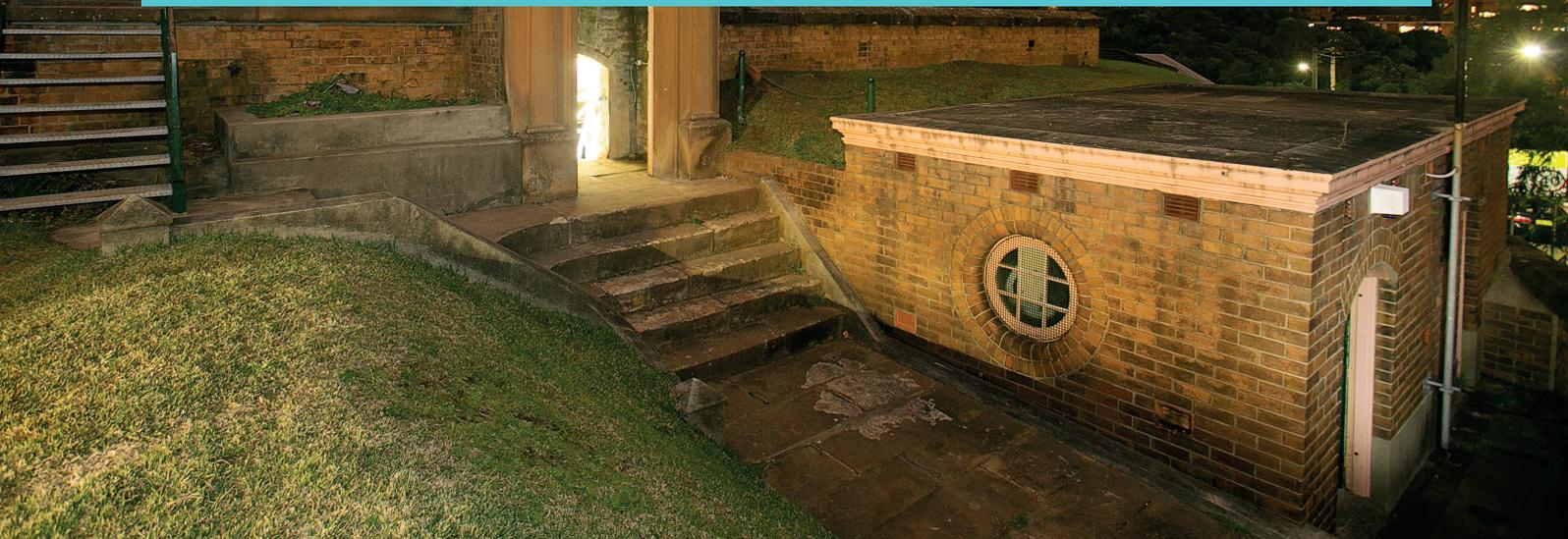
Our proud roots go back to the 1880's when water was first delivered to Newcastle from a temporary pumping station on the Hunter River at Oakhampton via the Newcastle No 1 Reservoir.

Like our region, we have grown considerably since then. We still place our customers and communities at the heart of all we do, and we are constantly looking for new ways to deliver sustainable, resilient and valued services to our community.

Our business operates within the traditional country of the Awabakal, Birpai, Darkinjung, Wonaruah and Worimi peoples. We recognise and deeply value their cultural heritage and beliefs and in particular, their custodianship of the waters of the Hunter for more than 40,000 years. Our Reconciliation Action Plan reflects our commitment to create improved economic, health and social outcomes for Aboriginal and Torres Strait Islander Peoples.

Our strong reputation, thought leadership and stakeholder relationships have allowed us to play an important and valued role in the development and implementation of policy, regulation, structural and economic reform in the water sector and to be a critical and trusted voice in the development of the region.

Our supply partners are a critical component in ensuring we continue to sustain and enable the quality of life for our communities.



# A letter from the Hunter Water Board of Directors'



**Greg Martin**  
Chair



**Darren Cleary**  
Managing  
Director

*Dear Commissioner*

*We are pleased to submit Hunter Water Corporation's third Modern Slavery Statement to the Australian Government Attorney General's Department for publication on the Online Register for Modern Slavery Statements as required in accordance with the Modern Slavery Act 2018 (Cth).*

*Hunter Water Corporation operates to deliver reliable, safe, quality water and wastewater services to our community in partnership with our landholders, suppliers and stakeholders.*

*Our third Modern Slavery Statement, demonstrates our ongoing commitment to identifying, assessing and addressing Modern Slavery risks throughout our operations and supply chain. Our approach to understanding and combating Modern Slavery requires commitment from the highest levels of our organisation and is given a priority focus from our Executive Management Team and Board of Directors.*

*During the 2021-22 reporting period, we have continued to build on the efforts undertaken during the previous two reporting periods and implemented further measures from our Modern Slavery Action Plan and Road Map, including awareness training for our people and for our key supply partners to ensure this is not just a priority for Hunter Water, but addressed and measurably delivered by our supply chain as well.*

*This statement has been approved by our Executive Management Team and the Hunter Water Board of Directors.*

A handwritten signature in black ink, appearing to read 'G. Martin'.

Greg Martin  
Chair

A handwritten signature in black ink, appearing to read 'Darren Cleary'.

Darren Cleary  
Managing Director

# Section 1

## Hunter Water

### Who we are

Hunter Water, the reporting entity, is a State-Owned Corporation (SOC), owned by the NSW Government with its principal functions set out under the Hunter Water Act 1991 and State-Owned Corporations Act 1989. Hunter Water does not control or own any other entities and as such is not required to consult with any other reporting entity.

We are a vertically integrated water utility – an operator and retailer from catchment to tap, sink to waterways. Our business operates within the traditional country of the Awabakal, Darkinjung, Wonaruah, Worimi and Geawegal peoples.

Our proud roots go back to the 1880s when water was first delivered to Newcastle from a temporary pumping station on the Hunter River at Oakhampton via the Newcastle No 1 Reservoir. Like our region, we have grown considerably since then. We place our customers and communities at the heart of all we do, and we are constantly looking for new ways to deliver sustainable, resilient, and valued services to our community.

### What we do

Hunter Water services a population of almost 600,000 people in homes and businesses across the Lower Hunter region in NSW. Our core responsibility is to supply reliable, high-quality water and wastewater services to the people of the Lower Hunter region. We provide services to our customers by building, operating and maintaining a portfolio of water, wastewater, recycled water and stormwater assets with a value of more than \$2.9 billion.

Our area of operations is 5,366 square kilometres and includes the local government areas of Cessnock, Dungog, Lake Macquarie, Maitland, Newcastle, Port Stephens and a small part of Singleton.

### Our structure

Hunter Water is governed by a Board of Directors appointed by voting shareholders, the NSW Treasurer and Minister for Finance and Small Business. Under the Hunter Water Act 1991, the Hunter Water Board of Directors comprises up to nine members including the Managing Director, Chairperson and seven independent Non-Executive Directors. We have a strong corporate governance framework that underpins our strategic objectives and commitment to customers, shareholders and the community.

### Our vision

Is to be a valued partner in delivering the aspirations for our region.

### Our purpose

Is to improve and enable the quality of life for our communities.

### Our values

Define the culture we want to embed in everything we do at Hunter Water. They are who we are as an organisation and how we behave. Our values help guide our decisions, balance our priorities, connecting us to achieve our vision. They are part of everything we do.

### Area of operations



## Section 2

# Our Values and the United Nations Sustainable Development Goals

We have signed the Water Services Association of Australia's urban water commitment to promote the SDGs across the water industry and within our communities.

The SDGs enable a common framework for engagement with stakeholders across our region and beyond, providing a path to help identify and act against Modern Slavery within our operations and our supply chain.

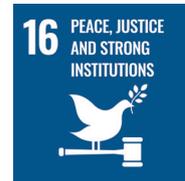
Our Hunter Water Values, which shape our decision-making, help to guide our approach to identifying and acting against Modern Slavery.



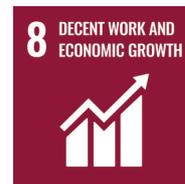
**WELLBEING** we care for each others wellbeing and that of our communities and environment



**TRUST** we are honest, open & ethical



**LEADING** we step up



**INCLUSION** we value & respect diversity



**LEARNING** we have a thirst for learning



# Section 3

## Modern Slavery Risks

### In our Organisation

The Modern Slavery Act 2018 (Cth) Guidance identifies the following organisational risk indicators:

- The use of unskilled, temporary, seasonal labour or child labour
- The use of short-term contracts and outsourcing
- The use of foreign workers, temporary, or unskilled workers to carry out functions that may be less visible such as night work or remote locations
- Recruitment strategies that target marginalised or disadvantaged communities
- The use of labour from countries that have a high prevalence of Modern Slavery or human rights violations, or countries that have not ratified international conventions relevant to Modern Slavery

The workforce composition at Hunter Water is Australian based and Australia is a country with a low risk of Modern Slavery according to the Global Slavery Index.

Out of our workforce of 515 staff, 486 comprising 94.4% are permanent employees with employment conditions governed by, and in accordance with Australian workplace legislative requirements. We also have a number of university students undertaking work experience roles in accordance with Australian workplace laws.

A Labour Hire Panel Contract arrangement is in place for short term contract-based employees which contains requirements for contract employee's employment conditions to be in accordance with Australian workplace legislative requirements. Panel members were appointed following a detailed assessment of their recruitment and labour practices to ensure any labour risks including modern slavery were appropriately mitigated.

As a result of our employee profile and practices, we have assessed our organisational Modern Slavery risk as low.

### In our Supply Chains

During 2021-22, Hunter Water payments to suppliers totalled \$269 Million. According to the Global Slavery Index, the risk of Modern Slavery in Australia is lower than many other jurisdictions. Almost all of Hunter Water's spend is undertaken with suppliers based in Australia. There are however goods and services that Hunter Water procures that are at a higher risk of modern slavery based on the geographic origin and/or industry sector as identified and categorised under the globally recognised Modern Slavery risk assessment approach.

Although Australian-based suppliers provide us with the goods and services we need across these known high-risk categories, these suppliers and their supply chains will continue to require ongoing engagement to ensure that Modern Slavery risks are identified, assessed, and addressed.

An independent review of Hunter Water supplier spend data undertaken in 2020 identified that 40% of our supplier base have the potential to be high risk, considering the following methodology:

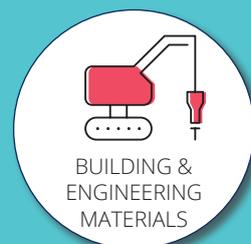
- the industry sector of the spend;
- the commodity or service purchased;
- the supplier geographic location and / or the product country of origin, where known; and
- the workforce profile of the service or commodity.

The potential high-risk percentage considered where the industry sector or geographic location of a supplier carried a greater level of risk exposure. It did not assess individual suppliers or their practices and behaviours, and it is not an indication that any of our suppliers are knowingly causing or contributing to Modern Slavery.

The risk review findings are used to us prioritise our Modern Slavery prevention and awareness efforts according to risk potential, as well as providing a baseline for our ongoing supplier due diligence processes.

Our supplier profile is likely to change in future years, given the nature of capital works programs, however the spend categories in which us spend occurs is less likely to change significantly. For this reason, spend category risk is a key focus of our risk management approach.

The following potentially high-risk products and services spend categories were identified as part of the 2020 review and have been reviewed and updated in the reporting period based on current Global Slavery Index G20 import risk data and our own supply chain risk assessment activities.



## Risk Assessment Actions

During the 2020-21 reporting period we undertook measures to understand the extent of Hunter Water's exposure to Modern Slavery in our supply chains. During 2020-21, these actions were reviewed and reconfirmed.

## COVID-19 & Modern Slavery Risks

The COVID-19 pandemic has impacted Hunter Water in several ways both operationally and in our supply chains as outlined below.

### Operational impacts of COVID-19

- Delays in project implementations including some Modern Slavery Action Plan action items
- Workplace reform to support employee safety

Despite the operational impacts, our organisational modern slavery risk profile remains low as our employee profile and our employment practices as described in section 3.1 have not been impacted.

Our Modern Slavery Action Plan timelines have been impacted and some projects scheduled for delivery during this reporting period have been postponed until future reporting periods, including expanding the delivery of our face-to-face modern slavery awareness training for our employees.

### Supply chain impacts of COVID-19

Over the current and previous reporting periods we have generally observed global manufacturing disruptions, freight and logistics delays and product and raw materials shortages;

- increased supplier insolvency risks
- increased product lead times
- lack of product availability

To address the above risks, we have occasionally needed to source alternative products or engage alternative suppliers which has the potential to increase our modern slavery risk profile in our supply chains. In recognition of the increased risk, Hunter Water has taken the following actions to mitigate this risk:

- Updating policies and procedures to include modern slavery compliance requirements
- Amending contract templates to include modern slavery compliance requirements
- Incorporating consideration of modern slavery risks in tender scope development and evaluation criteria
- Developing and introducing a Supplier Partnership Principles and Supporting Supplier Assessment Schedules as detailed in our Modern Slavery Action Report Card.
- Conducting supplier briefing sessions on the Supplier Partnership Principles and Supplier Assessment Schedules to explain the purpose and clarify expectations.

# Section 4

## Our Modern Slavery action plan

### What we have done

In the 2021-22 reporting period, we continued to build on our achievements reported in the previous statement submissions as shown in our Modern Slavery Action Report Card. In 2019-20 we began our journey to understand, assess and address Modern Slavery risks in our operations and through our supply chains. We continue to build on this with new actions completed and future actions identified and reported in each annual Modern Slavery Statement. Our evolution and achievements are highlighted in the Modern Slavery Report Card following.



### What we will do

Our Modern Slavery Report Card includes the actions we are currently progressing as well as the actions we will achieve over the next reporting period. These are broadly categorised into four focus areas covering:

#### Risk Identification and Planning



#### Awareness and Training



#### Collaboration and Engagement



#### Governance and Risk Mitigation



# Hunter Water's Modern Slavery Report Card

FOCUS AREA	ACTION	DETAILS	YEAR	STATUS
Risk Identification and Planning	Gap Analysis	Undertake detailed organisational gap analysis and a supplier data analysis to identify potential Modern Slavery risks and mitigation actions within our operations and supply chains	2019/20	●
	Modern Slavery Action Plan	Develop and implement and report on an organisational-wide Modern Slavery Action Plan Road Map based on the gap analysis learnings to build and continually improve our Modern Slavery mitigation activity over a 3-year period. To be endorsed by the Executive Management Team	2019/20	●
	Risk Identification and Planning	Establish a tool and set of questions / criteria for assessing Supplier Modern Slavery Risk, and hierarchy of risk management actions based on risk assessment. *See case study 1 for details	2021/22	●
Awareness and Training	Awareness Training	Implement Modern Slavery Awareness training to members of our Executive Management Team and key Contract Managers/Procurement Staff.	2019/20	●
	Supplier Partnership Principles	Establish and launch the Supplier Partnership Principles to set out our expectations of our partner suppliers and requires our suppliers to provide information regarding the identification and mitigation of Modern Slavery risks, including hidden labour exploitation.	2020/21	●
	Awareness and Training	Develop and implement mandatory training module for all-staff and contractors at Hunter Water. *95% in 2022	2020/21	●
	Supplier Forum	Develop and deliver supplier awareness training to our key construction, civil and electrical maintenance works supply partner.	2020/21	●
Collaboration and Engagement	Water Utility Sector Collaboration	Establish/join collaborative industry sector groups to facilitate collaborative Modern Slavery information sharing and action. *See Section 5 Collaborative Action for details	2020/21	●
	Hunter Water Inter Department Collaboration	Establish a Sustainable Procurement Working Group with representatives from across several functions within our business responsible for the implementation and ongoing monitoring of sustainable procurement objectives, including the Modern Slavery Action Plan.	2020/21	●
Governance and Risk Mitigation	Sustainable Procurement Working Group	Establish a Sustainable Procurement Working Group with representatives from across several functions within our business responsible for the implementation and ongoing monitoring of sustainable procurement objectives, including the Modern Slavery Action Plan.  The Working Group will have accountability to the Group Manager Commercial & Procurement and provide progress updates to the Procurement Committee.	2019/20	●
	Supplier Sustainability Assessment Schedule	Hunter Water established this assessment process to assess supplier maturation on a number of sustainability focus areas including labour practices and modern slavery risk management and compliance in support of the Supplier Partnership Principles.	2020/21	●
	Governance and Risk Mitigation	Establish an independent and confidential Whistle Blower Service to facilitate reports of misconduct, including actual or suspected instances of Modern Slavery for all employees, contractors, tenderers, suppliers, agents, and their employees. Employees and contractors are provided training and guidance on the Whistle Blower service.	2020/21	●
	Contracts and Policy Review to Include Modern Slavery legislative requirements	Amend Hunter Water suite of Contracts to include clauses for compliance with Modern Slavery requirements, scaled to the relative risk and value associated with the contract terms.  Amended Hunter Water internal policies and procedures to embed consideration of Modern Slavery risks into our business, such as the Conflicts of Interest policy.	2020/21	●
	Labour Hire Panel	Establish a Labour Hire Panel tender to ensure tender responses incorporated consideration of the robustness of processes to mitigate the risk of Modern Slavery, labour exploitation, and human rights abuses of the respondents.	2020/21	●
	Modern Slavery Enterprise Risk Management Incorporation	Establish a Modern Slavery Risk Management approach incorporated into Hunter Water's Enterprise Risk Management Framework and tool. *See case studies for details	2020/21	●
	Modern Slavery Risk Triage Protocol	Establish organisational protocols for triage, response, and investigation and close of actual or suspected incidents of Modern Slavery in Hunter Water Supply Chains	2021/22	●

# Section 5

## Collaborative action

Hunter Water understands that having a collaborative approach to Modern Slavery risks internally, regionally and within our industry helps to drive awareness and supports greater effectiveness and efficiency through consistent supply chain management. For this reason, we have established the following collaborative forums to promote consistency and leverage economies of scale in identifying and mitigating Modern Slavery risks.

### Water Utility Sector Collaboration

Hunter Water established a joint regional water sector working group with Water NSW and Sydney Water in 2020 to share our modern slavery journey, investigate opportunities for collaborative Modern Slavery action. The purpose of the forum is to facilitate sharing of information, initiatives and identifies opportunities for sector and regional based collaborative action on Modern Slavery awareness and risk mitigation. In 2019-20 the working group focused on information sharing and knowledge growth regarding Modern Slavery as relevant to our sector and region.

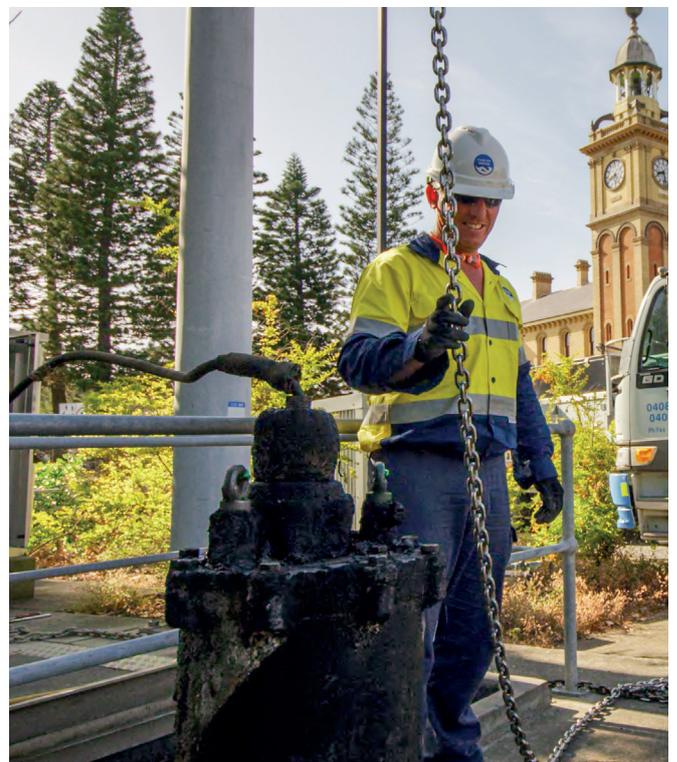
Hunter Water is also a participant in the Water Service Association of Australia (WSAA) Modern Slavery Joint Action Group which is currently collaborating on the following two initiatives:

Sourcing and implementation of an on-line Modern Slavery Supplier Assessment Tool to ensure water industry suppliers modern slavery risk profiles are assessed and managed in a consistent way by the sector.

Coordinate and provide joint sector feedback response to the Modern Slavery Act Review being undertaken by the Attorney General's Modern Slavery and Human Trafficking Branch.

### Inter Department Collaboration

A Sustainable Procurement Working Group comprising of representatives from a broad section of the organisation is in its third year of operation. The Working Group ensures cross organisational responsibility for ongoing monitoring and delivery of the Modern Slavery Action Plan. The inter departmental membership ensures modern slavery risks and actions are considered from a variety of business perspectives.



# Section 6

## Case studies

Driving Collaborative Modern Slavery approaches in Supply Partnerships Hunter Water has commenced inclusion of a Balanced Scorecard approach to Contract Performance KPIs on key strategic contracts. This approach achieves the following:

- cascades and aligns our values with supplier deliverables
- aligns supplier contract performance to key strategic objectives
- helps build supplier capacity over the life of the contract

The following Balanced Scorecard KPI included in our Laboratory Services Contract with ALS Global demonstrates this as shown below.

Wellbeing	Trust	Leading	Learning	Inclusion
<b>Hunter Water Strategic Priorities</b>				
Safety and People	Great Services	Leading	Thought Leader & Digital Utility	Good Development
<b>Design and Engineering Partner Objectives</b>				
Ensure the safety of all our workers	Provide the Laboratory Services needed to plan and deliver Hunter Water's Vision	Improved Value for Money	Encourage and Support Innovation	Enable good development for the region
Ensure the safety of our community	Drive Economic Development	Efficiency in procurement	Grow the Capability of Our Team	Drive Economic Development
Build Real and Lasting Partnerships	Improve Scope Definition	Performance Based Contracts	Realise the benefits of being a digital utility	Develop a sustainable & resilient water & wastewater future
Improve Collective Behaviours and Culture	Improved Quality of Outputs	Enhanced Value of Outcomes	Drive Continuous Improvement	Drive Social Outcomes
<b>Critical Success Factors</b>				
Proactive approach to developing a safety culture	Ability to coordinate programs of work	Lower whole of life costs	Innovation, learning, continuous improvement	Improved customer and stakeholder engagement
Integrated planning & Design enabling optimum outcomes	The right resources doing the right role	Cost efficiency	Tools & processes which achieve better outcomes	Workforce development and industry participation
Partners which understand our org/program/project drivers	Improved Subcontracted Services	More time doing rather than transacting	Improved Project Estimates	Greater Regional Benefit through Planning and Investments
	Capacity and flexibility to deliver varying program on time		Systems approach	
	Flexible and efficient approach when scope is unclear		Link the planning phase with delivery	
			Better Resource Planning	
<b>Key Performance Indicators</b>				
Demonstrates best practice Safety approach	Demonstrates continuous improvement in the quality of outputs	Demonstrates Value for Money through efficient delivery of services: The cost and/or time for delivery of the outcomes of the services reduces over time	Demonstrates commitment to developing innovative solutions and learning initiatives which enhance the capability of the team and drive continuous improvement	Demonstrates best practice approach to improving sustainable decision making and improving environmental and social outcomes in our investment programs
Demonstrates collaborative behaviours and commitment to building Partnerships and flexibility and responsiveness to meet Hunter Water's requirements				Demonstrates commitment to increasing Industry Diversity and Inclusion with Hunter Water's Initiatives

# Case studies

The Inclusion Value cascades down to a KPI deliverable that requires a Diversity and Inclusion Policy to be developed to include aligning to Hunter Water's Modern Slavery commitments

## Develop a Sustainable and Resilient Water and Wastewater Future, Drive Social Outcomes

### Diversity & Inclusion

Demonstrates commitment to increasing Industry Diversity and Inclusion aligned with Hunter Water's initiatives

- Industry participation
- Supporting Women in business
- Reconciliation and Disability Support
- Modern Slavery

Development of a Diversity and Inclusion (D&I) Plan and delivery of initiatives and actions inline with the Service Provider's D&I Plan.



*Having a shared commitment and a collaborative approach to addressing modern slavery risks expressed as a contract deliverable provides a vehicle to share knowledge, resulting in improved approaches for both organisations in reducing the risks of poor labour practices in our supply chains.*

*Andrea Swan Manager Newcastle Environmental ALS Global*



### Hunter Water's Enterprise Risk Management System

During 2021-22, Hunter Water engaged a partner for delivery of an enterprise-wide risk management system. As a part of this project, a Modern Slavery risk management approach has been incorporated into the overarching risk management system. This system is due to go live in a phased approach during the 2023 calendar year. Additionally, Hunter Water has a subscription for compliance monitoring of modern slavery obligations, which will be integrated in to the risk management system. This will enable compliance checks against legislative changes, detail the strategies and actions to assess risks in operations and supply chains, as well as supporting the development of future modern slavery statements.

# Section 7

## Our effectiveness

At Hunter Water we evaluate our progress to assess and address modern slavery risk through the review of our action plan. As above the report card highlights the status of the action plan.

Our Sustainable Procurement Working Group oversees the action plan which is incorporated into our Sustainable Procurement Improvement Plan.

During 2021-22, the Sustainable Procurement Working Group convened five meetings, at which the action plan was reviewed and updated to reflect the current completion status of each action. Additionally, these meetings provided the opportunity to identify emerging risks in our supply chains and establish new and revised actions to be incorporated into our plan. Our Sustainable Procurement Working Group has executive oversight through the Group Manager Commercial and Procurement and the Procurement Committee.

In further assessing the effectiveness of our actions the following has been undertaken;

### TRAINING



We launched Modern Slavery awareness training as a mandatory online training module for all employees and contractors at Hunter Water. At 30 June 2022 the completion rate of this module was 88%. We will continue to monitor the completion rate and seek to have 95% of all employees and contractors, accounting for staffing changes, completing the training by 31 December 2022.

### WATER UTILITY SECTOR COLLABORATION



Hunter Water recently joined the Water Services Association of Australia's Modern Slavery working group. Through this group, we have collectively shared our experiences to date and recognise the importance of ongoing industry-wide collaboration to ensure our common supply chain risks are assessed and addressed systematically.

### SAFETY, HEALTH & WELLBEING FORUMS



During 2021-22, we developed Modern Slavery and supply chain risk training aimed at raising awareness and demonstrating our commitment to eradication of Modern Slavery to Suppliers in higher risk categories of our spend portfolio. We leveraged existing annual Safety, Health & Wellbeing Forums that are held with our civil and electrical maintenance suppliers, and our construction partners to deliver the presentations. These were held during July 2022 and delivered to representatives from 40 companies in our Supplier cohort. During the Q and A portions of the Forums, Suppliers actively discussed modern slavery and raised potential opportunities for sharing a modern slavery risk management practices with Hunter Water. These opportunities will be considered through 2022-23.

### SUPPLIER PARTNERSHIP PRINCIPLES



During 2020-21 Hunter Water implemented its Supplier Partnership Principles and the Sustainability Assessment Schedule, which is issued as a part of tender processes to ensure that Hunter Water engages with suppliers that meet a minimum level for sustainability. The gathering of this data during the tender phase has provided Hunter Water with insight into supplier obligations and identified opportunities for working with suppliers on common modern slavery risks. During 2021-22 we have been able to implement key performance measures on supplier contracts, which link to sustainability and the development of sustainability plans for specific tendering activities. This enables Hunter Water the opportunity to work with Suppliers on broad sustainability aspects, including human rights issues such as modern slavery. These processes have matured through 2021-22 are foundational in facilitating collaboration with our suppliers on major contracts.

### REVIEW



We have scheduled a review to be completed in the 2022-2023 financial year. This activity will look to review our current progress, how effective these actions have been and help to shape the ongoing action plan for Hunter Water to continue to assess and address modern slavery risk within our business and supply chain.

# Section 8

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## Our concluding comments

Hunter Water continues to work to understand and mitigate modern slavery risks within our organisation and supply chain. We acknowledge modern slavery risks have increased worldwide with estimates showing an increase of people working and living in modern slavery. These harmful practices erode the human rights of many people and must be exposed as we seek to eradicate modern slavery.

We seek to continually improve how we identify, assess and address modern slavery risks. We will continue to work with our suppliers, work collaboratively within the water industry, educate ourselves further to better identify the risks and seek to put transparent systems in place to mitigate the risks.

Ongoing collaboration is a key component to our approach to assess and address modern slavery risks. This is highlighted as part of our Supplier Partnership Principles which seek to create positive and collaborative working relationships with our suppliers.

We will continue to ensure our strong workplace policies, procedures and workplace culture are in place to build a foundation of best practice.



# Annexure A

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## Mandatory reporting requirements

<b>NO.</b>	<b>Reporting Criteria: Modern Slavery Act 2018 (Cth), section 16</b>	<b>SECTION</b>
A	Identify the reporting entity	1
B	Describe the structure, operations and supply chains of the reporting entity	1, 2, 3
C	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	1, 3
D	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	1, 4, 5, 6
E	Describe how the reporting entity assesses the effectiveness of such actions	7
F I	Describe the process of consultation with: any entities the reporting entity owns or controls	1
F II	Describe the process of consultation with: in the case of a reporting entity covered by a statement under section 14 (Joint Modern Slavery statements) – the entity giving the statement	1
G	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	1, 6, 8

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