

MODERN SLAVERY STATEMENT – FY2024/2025

Reporting Entity

Clarence Valley Council

ABN 85 864 095 684

This Modern Slavery Statement is submitted in accordance with the Modern Slavery Act 2018 and Section 428 (4) of the NSW Local Government Act 1993 by Clarence Valley Council (the Council) for the financial year ending 30 June 2025.

Our Structure, Operations and Supply Chain

Clarence Valley Council is a local government authority established under the Local Government Act 1993 (NSW), responsible for delivering essential public services to the communities of the Clarence Valley region.

The Council employs approximately 620 staff (circa 525 full-time equivalent) across multiple operational depots, administration buildings, community facilities, water and wastewater assets and works sites.

Our operations include, but are not limited to:

- Infrastructure construction and maintenance (roads, bridges, drainage, parks)
- Water supply and wastewater treatment services
- Waste and recycling services
- Community services, recreation, compliance and regulatory functions
- Cultural, library, airport and commercial facility operations

Our supply chain consists of local, national and international suppliers providing goods, materials, professional services, plant and fleet, uniforms, ICT and construction-related services. While most of our suppliers are Australian based, we recognise extended supply chain exposure through imported products and offshore manufacturing.

Modern Slavery Risks in Our Operations and Supply Chain

The Council acknowledges inherent risks in certain spend categories and supply chain segments, including:

- **Construction and civil works** — complex subcontracting arrangements
- **Cleaning and facility management services** — low-wage labour vulnerability
- **ICT hardware and electronics** — high-risk manufacturing regions
- **Uniforms, PPE and textiles** — potential exploitation within global textile supply chains
- **Plant, equipment, tools and consumables** — imported components and materials

While Council's workforce is employed under regulated Australian industrial relations frameworks, risks can arise through third-party contractors and indirect tier-2 and tier-3 supply chains.

Actions Taken to Assess and Address Modern Slavery Risks

During the reporting year, Clarence Valley Council undertook the following actions:

- A Modern Slavery Risk assessment is being developed and will be applied to certain procurement activities that meet the thresholds
- Commenced permanently embedding **modern slavery compliance clauses** into standard contract terms
- Planned the introduction of **supplier due-diligence requirements** for high-risk categories
- Commenced development of **awareness training** to be rolled out early 2026

These actions form part of an ongoing maturity plan and enforcement of our Modern Slavery Prevention Policy adopted in 2024.

Assessing Effectiveness

Council assesses effectiveness through:

- Contract compliance checks
- Incident reporting and resolution monitoring
- Periodic review of high-risk expenditure segments
- Instances of staff self-reporting

Consultation with Controlled Entities

Clarence Valley Council does not own or control any subsidiary entities during the reporting period. The Council participates in several regional and inter-government forums, including the North East Weight of Loads Group, which is a collaborative committee rather than an entity with an operational supply chain. Should Council in future own or control any entities, a formal consultation and reporting framework will be implemented to ensure consistent compliance and risk oversight.

Future Commitments and Continuous Improvement

In addition to completing our current actions, Council will focus on moving forward:

- Establishing a **Supplier Code of Conduct**
- Strengthening **contract management monitoring and escalation frameworks**

Council remains committed to supporting human rights and ethical sourcing across all functions.

Approval

This Modern Slavery Statement was approved by Laura Black, General Manager of Clarence Valley Council in accordance with section 13 of the Modern Slavery Act 2018 and Section 428 (4) of the NSW Local Government Act 1993.

Laura Black

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Date signed: 16/12/2025

General Manager

Clarence Valley Council