

Modern Slavery Statement

2024–25



This Modern Slavery Statement applies to both South East Water and our wholly owned subsidiary, Iota Services Pty Ltd and was approved by our Board of Directors on 8 December 2025.



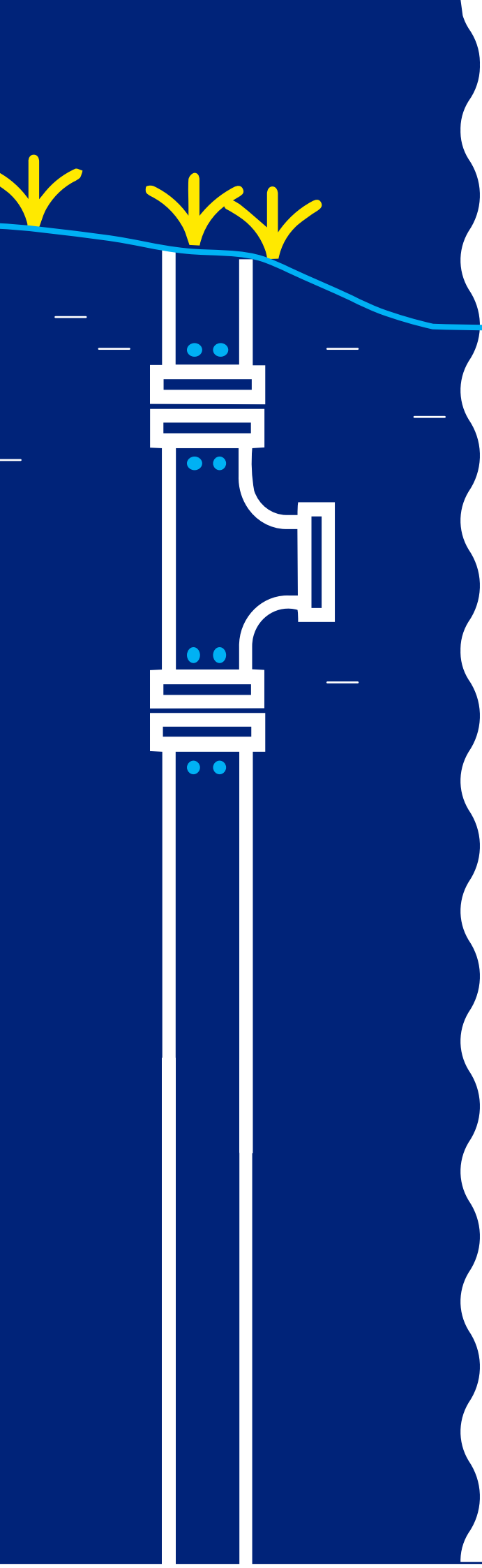
Carla Purcell
Managing Director

Acknowledgement

South East Water proudly acknowledges the Bunurong, Gunaikurnai and Wurundjeri Woi Wurrung as the Traditional Owners of the land on which we operate, and pay respect to their Elders past and present.

We acknowledge their songlines, cultural lore and continuing connection to the land and water.

We recognise and respect their continuing connections to climate, Culture and Country.



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About us – our operations, structure and supply chain

At South East Water (ABN 89 066 902 547), we're a metropolitan water corporation operating in Melbourne's south-east, established by the Victorian Government. We support healthy and liveable communities by delivering water, sewerage and recycled water services to over 1.8 million people (~30% of Melbourne's population) every day and every night.

We manage almost \$5.5 billion in assets across our water and sewerage networks – including pipes, pumping stations, valves and water recycling plants that bring water to our customers and take waste away.

The *Water Act 1989* and the Statement of Obligations issued by the Minister for Water under Section 41 of the *Water Industry Act 1994* govern our organisation's activities.

Service area

We operate on Bunurong, Wurundjeri Woi Wurrung and Gunaikurnai Country. Our service area covers 3,640 km² from Port Melbourne to Portsea and extends about 30 km east of Pakenham, spanning over 270 km of coastline.



Key facts

783,591

residential
customers

63,231

business
customers

1,831,777

people serviced

\$5.5 billion

infrastructure
asset base

146 billion

litres of drinking
water supplied

8.5 billion

litres of recycled water
supplied

148 billion

litres of wastewater
managed

8

water recycling
plants

14,726*

kilometres of
drinking water pipes

1,597*

kilometres of recycled
water pipes

11,681*

kilometres of sewer
pipes

14,796

pressure sewer
pumps

82

water pump stations

13

recycled water
pump stations

277

sewage pump stations

*Figure includes service connections

Iota – our commercial capability

Iota (ABN 73 602 562 765) is a wholly owned subsidiary of South East Water. The Iota Board is made up of members from the South East Water Board, the Managing Director of South East Water and the General Manager Digital and Transformation.

Iota continues to refine and commercialise a diverse portfolio of technologies and intellectual property developed by South East Water. In the past year, we've strengthened our collaboration with water organisations and partners in Victoria, across Australia and internationally. This has involved facilitating the trial and adoption of water and wastewater solutions to achieve environmental, customer, and economic benefits.

Sotto vibration sensors

Iota is now expanding South East Water's proven Sotto® vibration technology globally through strategic partnerships. Sotto® vibration sensors detect network (non-revenue water) leaks, saving water and lost revenue.

Lentic

Lentic is Iota's enterprise IoT platform solution designed for digital water metering, that seamlessly integrates device management, alarm management, data validation and analytics.

PYROCO

PYROCO is a unique heat recovery fluidised bed pyrolysis technology developed by RMIT to treat biosolids, while destroying PFAS. Iota and South East Water have successfully partnered with RMIT, Aquametro and others to see the first fully automated pyrolysis plant delivered based on the PYROCO design.

WaterSmart Program

To assist with the WaterSmart Program, Iota has been providing water saving solutions to South East Water's 100 biggest water users across 400 sites. Our solutions are helping them save water with Flow Lotic, a South East Water developed IoT data logger that transmits data from any pulse enabled water meter, and Footprint, a smart commercial metering platform that allows customers to set their own leak alerts and visualise their water usage collected from data loggers.

Priority Plumbing

Priority Plumbing is also a part of the Iota portfolio. Priority Plumbing provides civil, commercial and residential plumbing services across Melbourne's south-east. The 'Mains-to-Meter' program started in March 2025 and is delivered directly through Priority Plumbing. The program aims to enhance customer experiences, improve assets, and increase safety.

Our governance and structure

Our offices are in Melbourne, Victoria and our workforce consists of over 950 employees.

The South East Water Board is comprised of 9 non-executive directors (including the Chair), and the Managing Director. The Minister for Water, in consultation with the Treasurer, appoints the Chair and all Non-executive directors, who bring diverse skills, experience and perspectives. The Board appoints the Managing Director. As South East Water's responsible body, the Board exercises the powers of the Corporation and is responsible for overall governance, management and strategic direction in accordance with the legislative framework, and associated directions, policies and guidance. The Board is supported in the fulfilment of its functions by 3 committees.

For the current structure of our board and executive, please visit southeastwater.com.au.

Our supply chains

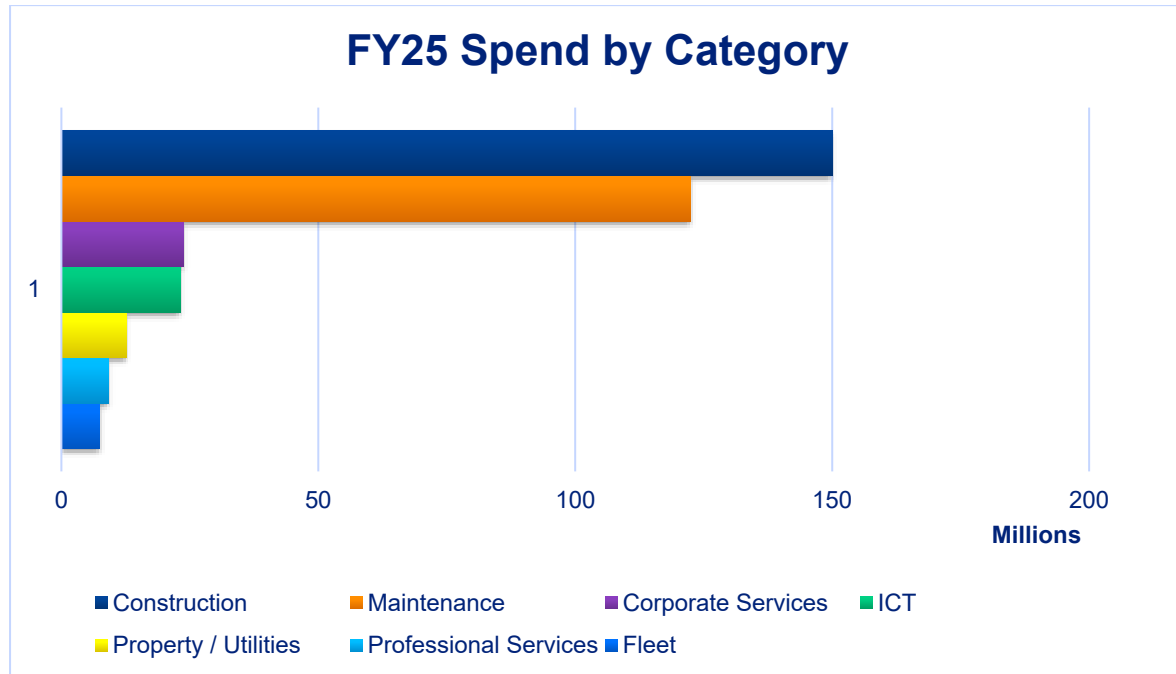
Our procurement activities focus on the delivery and maintenance of our water and sewer assets, which includes pipelines, pumps stations and water recycling plants.

Along with IT and general operational contracts, we also procure support services to maintain our facilities, such as cleaning and security. We procure a wide range of goods, services and construction, primarily from local suppliers, to support our day-to-day operations.

Iota's spend covers the procurement of plumbing services, materials related to plumbing supplies / commercial products, and corporate and professional services. Iota's customers manage water and wastewater services in Australia, New Zealand, Singapore, Ireland, Fiji, and Malaysia.

Approximately 834 suppliers made up our combined supply, with an annual spend of \$366 million.

Our policies and procedures align to the Victorian Government Purchasing Board policies and Ministerial Directions and Instructions for public construction procurement.



Management of our modern slavery risks

Managing risk is fundamental to our ability to deliver safe, reliable and sustainable essential services to our customers, today and into the future.

We operate under a robust enterprise risk management framework that aligns with the Australian/New Zealand Risk Management Standard (AS/NZS ISO 31000). This meets the requirements of the Victorian Government Risk Management Framework.

Complementing this, our compliance management framework is aligned with ISO 37301, supporting a culture of integrity and adherence to legal and regulatory obligations.

Our risk framework integrates a clearly defined risk appetite, aligned with our strategic objectives, to guide informed decision-making. It promotes a consistent, forward-looking approach to identifying and assessing uncertainties, including threats and opportunities, that may impact our ability to achieve our purpose and ambition.

We address modern slavery risks through a combination of our risk management framework, procurement policy, and social procurement framework. These are also supported by formal policies such as our Code of Conduct and Protected

Disclosures Policy and overseen by our Board and relevant sub-committees to ensure ethical and lawful practices.

Our approach to managing modern slavery risks across our operations and supply chains remains consistent. We structure our approach around 4 key steps:

1. Education and awareness
2. Modern slavery risks assessment across our operations and supply chains
3. Implementation of targeted actions to mitigate modern slavery risks
4. Ongoing review of the effectiveness of these actions

Education and awareness

To ensure new suppliers meet our modern slavery assessment requirements, all contract templates include dedicated modern slavery clauses. As part of our broader procurement process, shortlisted tender respondents are required to complete a modern slavery assessment questionnaire as part of their submission. We evaluate these responses in line with the tender evaluation process, providing feedback during the debrief stage.

Employees involved in procurement receive guidance on identifying modern slavery risks during the tender assessment process, supported by our procurement risk assessment framework. This ensures a consistent and informed approach to managing ethical risks in our supply chain.

Our modern slavery statements are also published online on South East Water's website southeastwater.com.au.

Assessing modern slavery risks in our operations and supply chains

Identifying higher risk focus areas

We've reviewed our profile of high-risk procurement categories for modern slavery and confirmed it remains unchanged. These categories reflect the consistently require heightened vigilance because of their inherent risk characteristics. They include:

Procurement portfolio	Higher risk supplier profile
Asset maintenance	Ongoing operations and maintenance of facilities, including cleaning and security services in a category known to have a higher risk of modern slavery practices in Australia
Construction	Construction labour (minor and major projects) with many levels of sub-contracting including offshoring of engineering consulting services to a country with higher risks of modern slavery practices
Corporate	Temporary staff, labour hire and traineeship programs. Lack of visibility in the human rights practices of the labour hire suppliers

Procurement portfolio	Higher risk supplier profile
Customer	Debt collection services, customer research services, which may be offshored to a country with higher risks of modern slavery practices
Equipment and material	Digital meters, mechanical, electrical equipment, and chemical products purchased from suppliers that distribute goods likely to be manufactured in a country with higher risk of modern slavery practices
Information Technology (IT) consulting	Offshore IT services based in a country with higher risks of modern slavery practices

Implementing actions addressing the risks of modern slavery practices

Assessing and addressing modern slavery risks using the Informed 365 supplier assessment platform

During 2024–25, we participated in the Informed 365 Water Services Association of Australia (WSAA) Collaboration, alongside 12 other water utilities, to address modern slavery risks in our operations and supply chains. Monthly meetings were held from July 2024 to June 2025, facilitated by Better Sydney and supported by Informed 365 representatives.

The collaboration focused on identifying risks through:

- Modern Slavery Supplier Assessment Questionnaires (SAQs) developed with WSAA.
- Data points from SAQs used as indicators of human rights risks.
- Use of the Inherent Risk Identification Tool (IRIT) from the NSW Anti-Slavery Commissioner's Office.
- Discussions on grievance mechanisms and due diligence processes for higher-risk suppliers.

Through our WSAA working group, we contributed to and benefited from:

- Onboarding of 2,914 suppliers across the platform (147% increase from 1,180).
- Supplier engagement rate increased to 76% (up from 23%).
- Access to 20 free modern slavery learning resources, used 314 times.
- Development of Continuous Improvement Pathways (CIPs) for our suppliers.
- Launch of the Informed 365 Help Centre and ChatBot to improve supplier engagement and data interpretation.
- Annual review and streamlining of SAQs to reduce supplier fatigue.

In FY2025, we successfully engaged 60 suppliers from our highest-risk procurement categories through the Informed 365 platform. 59 suppliers were assessed as Medium or Low risk for Modern Slavery, with 1 Uncategorised, demonstrating strong progress in safeguarding our supply chain and upholding ethical standards.

Inherent Risk		Supplier Engagement		Reports	
60 Suppliers	90.00% Risk Assessed	55 Engaged	91.67% Engagement Rate	27 SAQ	49.09% Response Rate
Uncategorised 1	Very Low 0	Low 19	Medium 40	High 0	Very High 0

Reviewing the effectiveness of our actions

We monitored effectiveness via:

- Monthly data updates showing supplier engagement and completion rates.
- Independent scoring and weighting of SAQ responses to assess changing risk levels.
- Use of anonymised and aggregated data for benchmarking and internal reporting.
- Uptake of learning resources and supplier feedback.

We'll keep engaging with our suppliers and stakeholders to ensure that our modern slavery risk assessments identify any potential risks and create opportunities to promote ethical practices and educate suppliers.

Consultation and approval process

We engaged collaboratively with other utilities in the WSAA group, sharing insights and aligning approaches to modern slavery risk management.

The South East Water Board of Directors and relevant committees will retain oversight of our human rights and modern slavery risks through our corporate strategy, procurement practices and operational compliance activities.

Our Executive team has been involved in the review and endorsement of this statement for approval by the Board.

The year ahead

Priorities, collaboration and improvement

As WSAA members continue to strengthen their response to modern slavery risks, the Informed 365 platform remains central to enabling meaningful action across supply chains.

The 2025–26 priorities reflect a maturing approach that builds on the platform’s evolving features and collaborative insights, and South East Water shares these priorities. These include a sharpened focus on grievance mechanisms and remediation, supplier engagement and education, and continuous improvement through data-driven reporting.

1. **Review supplier engagement:** Building on the July 2024 initiative to distinguish between active and inactive suppliers, members are encouraged to regularly audit supplier classifications to ensure accurate engagement metrics. This supports more targeted outreach and avoids misrepresentation of supplier risk exposure.
2. **Utilise new reporting tools:** The January 2025 launch of the platform’s enhanced ‘Reports’ function enables members to visualise key risk indicators and supplier trends over time. These tools support internal reporting and external disclosures, including Modern Slavery Statements, by translating raw data into actionable insights.
3. **Refine and update SAQs:** The November 2024 streamlining of the Supplier Assessment Questionnaire (SAQ) reduced supplier fatigue while improving response quality. Members continue refining question sets to align with emerging legislative requirements and sector-specific risks, such as those related to the Security of Critical Infrastructure (SOCl) Act 2018.
4. **Benchmark performance:** Monthly data updates and anonymised WSAA-wide statistics allow members to benchmark supplier risk profiles. This comparative analysis helps identify outliers and informs prioritisation of due diligence efforts, especially in high-risk categories.
5. **Promote learning resources:** With over 20 free modern slavery learning resources embedded in the platform and accessed 314 times in FY2025, members are urged to actively promote these materials. The January 2025 refresh of the resource list ensures suppliers have access to current, relevant content to build awareness and capacity.
6. **Engage with help centre:** The June 2025 launch of the Informed 365 Help Centre, including FAQs and a Chatbot, provides suppliers with real-time support. Members should leverage this tool to improve supplier communication, clarify expectations, and assist in interpreting complex data sets.
7. **Stay compliant:** The March 2025 discussions around the ACCC’s ‘Guide to Sustainability Collaborations’ reinforced the importance of maintaining compliance with competition laws. Members must also ensure procurement practices align with the **Modern Slavery Act 2018 (Cth)** and evolving guidance such as the **NSW Anti-Slavery Commissioner’s Guidance on Reasonable Steps** and the **Inherent Risk Identification Tool (IRIT)**.
8. **Build organisational awareness and capability to identify and respond to modern slavery risks:** Deliver modern slavery training sessions to all staff, tailored to different roles and incorporate real-world case studies and survivor perspectives to deepen understanding and empathy.

9. **Develop a Modern Slavery Policy:** To formalise South East Water's commitment to preventing modern slavery in our operations and supply chains and publish our policy on our website and intranet for transparency and accountability.
10. **Continuous improvement and risk-based auditing:** Conduct random audits on high-risk contracts and suppliers, focusing on sectors like construction, cleaning, and PPE, including developing clear procedures for responding to suspected modern slavery cases, including escalation, supplier engagement, and reporting.

Healthy Water. For Life.

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