



**Unity**water

Serving you today, investing in tomorrow.

# **Modern Slavery Statement**

1 July 2022 – 30 June 2023

## Acknowledgement of Country

Unitywater acknowledges the Traditional Owners of the lands on which we operate – the Jinibara, Kabi Kabi and Turrbal people. We recognise their significant contributions to the conservation of our environment and their deep connection to the land and waters.



Our Cultural Spring motif symbolises a water hole, traditionally a gathering place where knowledge is shared. The depth of colour illustrates the connection between land and water and our commitment to reconciliation, bringing our people together and fostering a deeper understanding and respect for Aboriginal and Torres Strait Islander cultures.

We are proud to have worked with Gilimbaa Creative Agency on this cultural artwork.

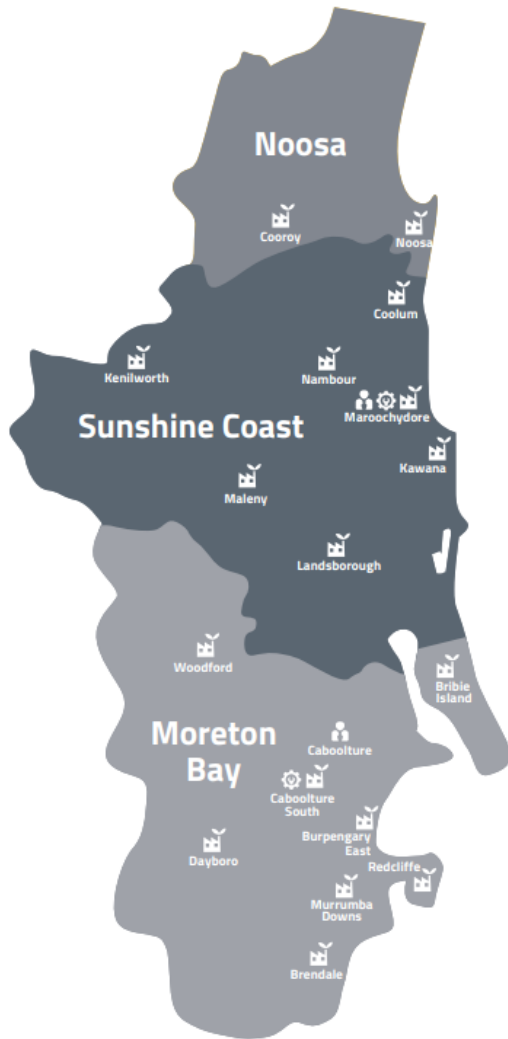


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## 1. Unitywater overview

### 1.1 About us



Twenty-four hours a day, seven days a week, Unitywater provides customers in Moreton Bay, Sunshine Coast and Noosa with quality, safe and reliable water and wastewater services.

We take pride in providing essential services that are economically and environmentally sustainable, delivering on our purpose of fostering healthy and thriving communities.




Our modern slavery statement aligns to our core vision, values, and strategic ambition: Value Every Drop, Customer of the Future, Keep it Simple and One Unitywater.

### 1.2 Structure

Unitywater is a Queensland statutory authority that provides water and sewerage services to the Moreton Bay, Sunshine Coast and Noosa local government areas. It has four wholly owned subsidiaries, Headworks Australia Pty Ltd (ACN 637 942 646), Unitywater Properties Pty Ltd (ACN 616 651 042), WTCC Pty Ltd (ACN 651649633) and Unitywater Properties No. 2 Pty Ltd (ACN 651834 883).

### 1.3 Operations

Unitywater operates in one of the fastest growing regions of Australia, providing essential water and sewerage services to three council regions that are home to 16.4% of Queensland's population.

-  **Corporate Offices**
-  **Service Centres**
-  **Treatment Plants**

We operate and maintain more than \$3.8 billion worth of essential assets, for customers across 5,223 square kilometers. Our service area stretches from Cooroy in the north to Samford in the south and from Bribie Island in the east to Kenilworth in the west.

On behalf of the Moreton Bay, Sunshine Coast and Noosa communities we:

- Maintain and supply drinking-quality water to homes, businesses, and public areas; collect, treat and dispose of sewage.
- Produce and provide recycled water to commercial and residential customers and community groups.
- Manage trade waste from our business and industrial customers.
- Build, manage, operate and maintain our sewage treatment plants, water supply infrastructure and recycled water assets.
- Provide around-the-clock response to sewerage and water emergencies manage customer and stakeholder enquiries.
- Issue and manage water and sewerage accounts.

## 1.4 Supply chains

With the population of the Sunshine Coast, Moreton Bay and Noosa regions projected to grow 20% by 2030, we are planning to meet the future needs of the region in an economically and environmentally sustainable way.

Our long-term capital works program includes an investment of \$1.8 billion over the next five years and will cater for population growth and ensure our infrastructure meets strict standards for our unique and delicate environment.

We will continue to upgrade and invest in sewerage and water supply infrastructure in ways that keep us at the forefront of environmental practices and meet the challenges of flood risk, population growth and climate change.

Unitywater had 1031 suppliers in 2022-23 who helped to ensure goods and services were provided for approximately:

- 6152km sewerage mains
- 801 sewage pump stations
- 17 sewage treatment plants
- 373,779 water connections
- 6337km water mains
- 71 water pump stations
- 103 water reservoirs
- 12 schemes supplying recycled water 756 team members.

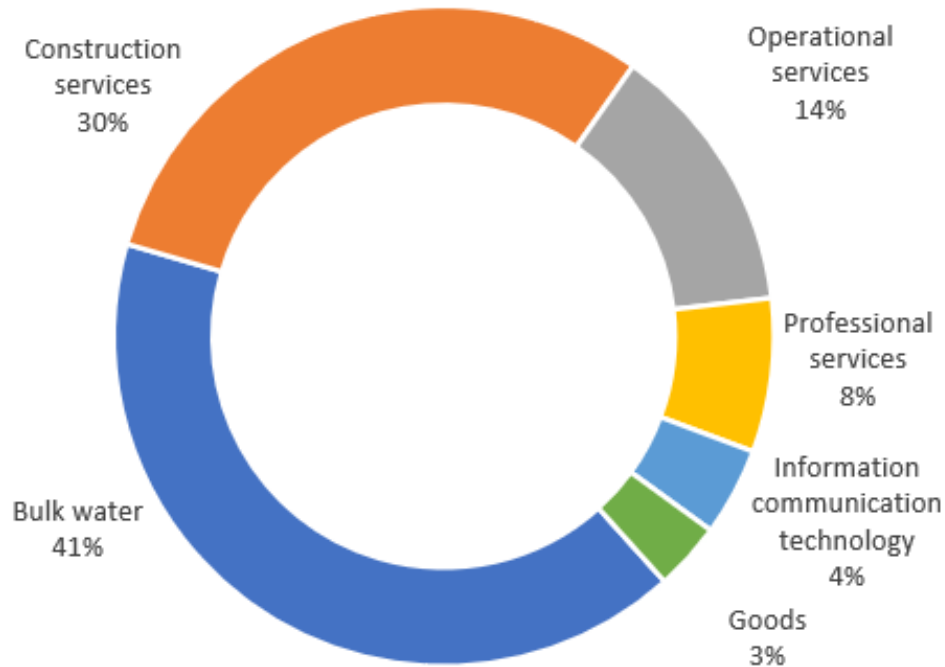
Over the course of the 2022-23 financial year Unitywater spent \$622M (inclusive of GST) on goods and services to provide water and sewerage services to the Moreton Bay, Sunshine Coast and Noosa regions.

Procured goods included water, electricity, chemicals, IT hardware, gas, machinery, equipment, and fuel.

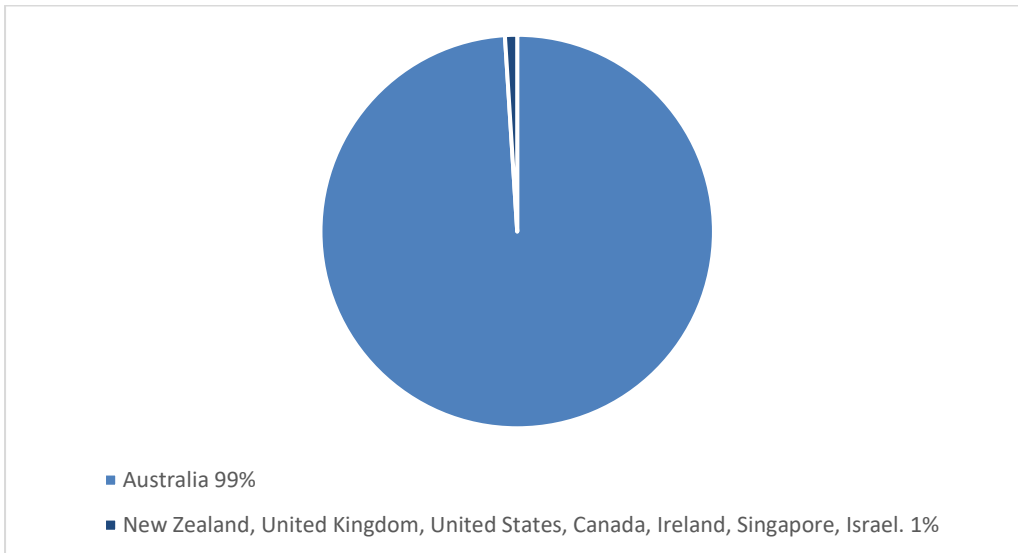
Procured services included construction, business management, machinery and equipment repair, waste management, facilities management, labour hire and recruitment, traffic control services, wet and dry hire, and telecommunications.

Our key areas of spend is indicated below:

### Key areas of spend



### Spend by country



\*Some suppliers are Australian subsidiaries of overseas suppliers.

## 2. Risks of modern slavery

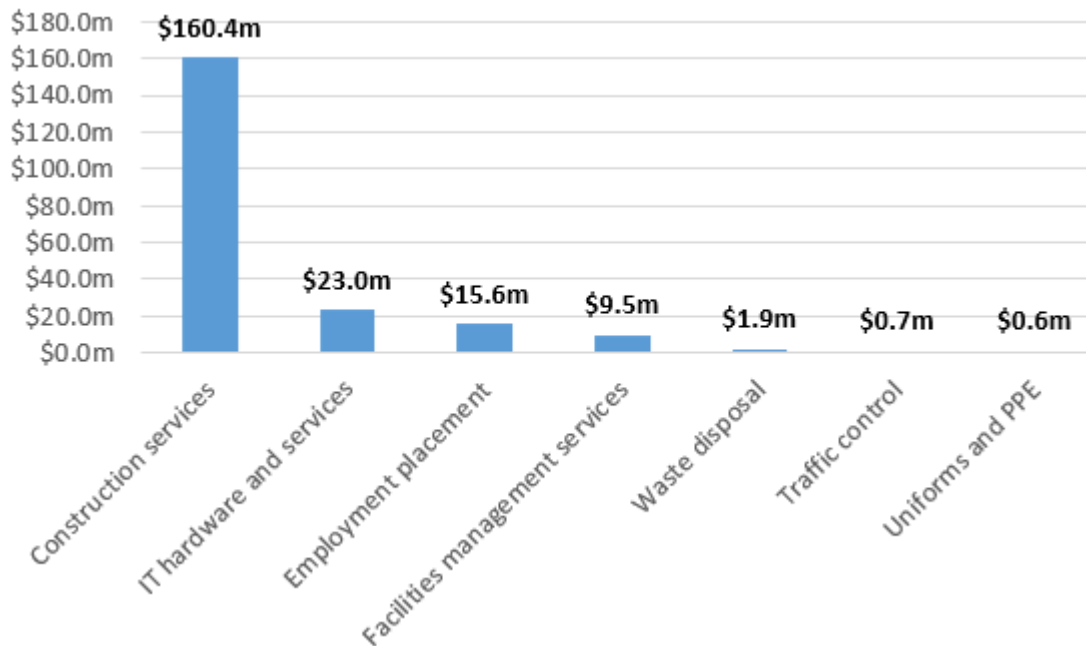
### 2.1 Supply chain risks

Based on the Global Slavery Index for products that present a high risk for import into Australia and industries where there may be migrant workers, we have reviewed our suppliers and identified the following industries as high risk of modern slavery:

- Construction services
- IT hardware and services
- Employment placement
- Facilities management services (including cleaning services)
- Waste disposal
- Traffic control
- Uniforms and Personal Protective Equipment (PPE)

Our spend in high-risk industries during the reporting period are listed below:

#### Spend in high-risk industries



## 2.2 Operations risks

Unitywater recognises its responsibility to ensure its employees are paid appropriate and fair remuneration; can access all leave and employment conditions they are legally entitled to; dealt with fairly and given natural justice in any dispute, especially our trainees and apprentices; and that there is no exploitation of children in our workplace.

Our modern slavery risks and their controls are summarised in the table below. These risks are actively managed through our Risk Management Database.

### Modern slavery risks

| Risk event   | Controls  |
|--|---|
| Unitywater's suppliers engage in modern slavery.                         | <ol style="list-style-type: none"> <li>1. Apply stringent due diligence to supplier selection process.</li> <li>2. Clearly articulate reporting and anti-modern slavery obligations in contracts.</li> <li>3. Continue to develop an understanding of potential for exposure to modern slavery in supply chains.</li> <li>4. Develop a procedure for Unitywater to address modern slavery in its supply chain.</li> <li>5. Continue to train and raise awareness of modern slavery for specific Unitywater roles to help them identify and mitigate modern slavery risks.</li> <li>6. Regularly survey high risk suppliers on their compliance with modern slavery obligations.</li> <li>7. Implement a response protocol for employees and the community to report suspected instances of modern slavery.</li> </ol> |
| Recruitment practices breach modern slavery requirements.                | <ol style="list-style-type: none"> <li>1. Review Unitywater employment contracts against human rights and modern slavery acts.</li> <li>2. Continue to ensure recruitment procedures include validation of applicants' right to work and age.</li> <li>3. Continue to ensure roles are assessed against award standards to ensure at least minimum remuneration is paid, if not better.</li> </ol>  |
| Obligations towards employees are not adequately protected or addressed. | <ol style="list-style-type: none"> <li>1. Review employment contracts against human rights and modern slavery acts.</li> <li>2. Audit fatigue management systems, processes, procedures.</li> <li>3. Provide adequate systems of communication whereby employees can raise any concerns they have with Unitywater not fulfilling its obligations in a way that is transparent, fair and meaningful.</li> </ol>  |



## 3. Actions taken to address risks

### 3.1 Supply due diligence

It is imperative that we only do business with ethical suppliers. An ethical supplier is one that offers quality jobs, provides a safe workplace, invests in training workers, demonstrates respect for workers, considers the environment and contributes to positive social outcomes for the communities in which the supplier operates.

To build supportive, transparent and collaborative relationships with our suppliers, we have surveyed suppliers who were identified in high-risk industries, seeking further information about their business structure, operations, supply chains and other ethical practices.

To increase supplier response rates and gain more upstream information in supply chains, we have been working closely with the Water Services Association of Australia (WSAA) to develop an industry approach to Modern Slavery. Via WSAA and with other water utilities we have agreed to collaborate to collect and share data that is common to our supply chains, shared suppliers, and areas of activity that may represent increased risks of harm to people. The goal is to collaborate on projects and initiatives around how we assess and address modern slavery risks, as well as opportunities for collective continuous improvement around modern slavery reporting.

Through WSAA we are now working with technology provider Informed 365, supply chain and modern slavery experts Better Sydney and other water utilities, to provide a water services industry supplier platform. This online supplier platform will guide suppliers through an assessment to help understand and assess the modern slavery risks in their own operations and supply chains and providing links to online educational resources to support continuous improvement. The responses to the assessment will assist us in assessing and addressing modern slavery risks across individual suppliers, understanding the trends and patterns across sectors and supply chains, and tracking the effectiveness of actions over time. Information from the supplier platform will also help the WSAA to assess skills and knowledge gaps, share resources with suppliers that can encourage continuous improvement, and support stronger supplier engagement.

We also collaborate with Queensland State Government Departments and Southeast Queensland utilities as part of the Queensland State Government Modern Slavery community of practice. The community of practice shares information, insights, and issues to improve the knowledge of the group.

Our tender templates, Procurement Guide and contracts have been updated to reflect our commitment to procuring from ethical suppliers. It provides Unitywater teams with information on what constitutes modern slavery and outlines the application to the sourcing process. Our market approach templates have been updated to include sample questions designed to gain an insight into potential supplier's supply chains and ethical practices.

Our purchasing contracts have been updated to include obligations for suppliers to assess, control and notify us of modern slavery. We are investigating ways to enhance the onboarding process of suppliers to ensure all suppliers engaged are screened for modern slavery risks. Doing business with ethical suppliers enhances our vision to be a sustainable water and sewerage service provider that creates value for its customers and returns value to stakeholders.

We continue to focus on providing training to our procurement team on how to screen suppliers for modern slavery risks throughout the procurement lifecycle and collaborate with those suppliers if risks are identified.

We will be implementing a modern slavery response protocol so that employees or the community know how to report if they became informed of or identify that a supplier is engaging in modern slavery.

## 3.2 Operations due diligence

Unitywater respects ethical labour practices and values and promotes diversity. Consistent with these principles, we have a zero-tolerance approach to any form of modern slavery in our operations, whether it be servitude, forced labour, debt bondage, human trafficking or any other recognised form of slavery. We recognise our responsibility to:

- Represent Unitywater accurately.
- Accurately describe the type of work and work conditions.
- Ensure that employees are given work they are lawfully able to do.
- Ensure that employees are not harmed or exploited in connection with employment provide fair remuneration.
- Provide a safe and appropriate work environment and work conditions.

Our recruitment policy helps to ensure all recruitment decisions are consistent with Unitywater values. The recruitment process is applied consistently and fairly, and we act in accordance with the principles from our policy. We have a formal recruitment process for both our permanent and contingent workforce that our recruitment team is required to follow. When external recruitment agencies are engaged to act on our behalf, they are also required to follow these recruitment processes. It is also imperative that our recruitment team and hiring leaders identify and support diverse candidates throughout the recruitment process so that we can build a more diverse and inclusive workplace.

Our online recruitment management system includes verification points to ensure our policies and procedures are correctly followed. For example, a candidate is required to verify their identity and confirm their right-to-work status. Using the information provided, contracts are prepared, that comply with relevant legislation and Unitywater's policies and procedures.

To mitigate the risk of modern slavery, we use a range of engagement methods to source applicants depending on the needs of the business. In all cases individuals can apply for work, decline an offer or otherwise opt out of the process at any time.

Each position, whether advertised internally or externally, is assessed to ensure there is no misleading information and to establish that it is a genuine vacancy that can be filled. A position description is always prepared and provided to candidates on request.

Candidates are provided with a written contract of employment prior to their commencement that confirms the terms and conditions of employment including position title, salary information, work location, conditions and entitlements.

We have comprehensive policies, procedures and systems in place to ensure that employees are paid accurately and on time, in accordance with their contractual entitlements and that leave entitlements are granted consistently and in line with the requirements of the Australian Government Fair Work Act 2009.

We conduct an annual reconciliation to assess and address the potential risk of underpayment and failure to correctly calculate leave accrual.

We review total compensation annually to ensure employees are paid appropriately at or above the applicable industrial instrument. In the event of any shortfall, this is corrected each year as part of the annual reconciliation process.

A modern slavery training program was issued to all leaders across the organisation as well as team members from Procurement, Wellbeing and Continuous Improvement, Human Resources Business Partnering and Recruitment. The training addressed acceptable working conditions and the risks pertaining to modern slavery. Refresher training for applicable team members will be provided every two years.

The modern slavery training module forms a part of the onboarding process for all new team members, based on their role.

## 4. Effectiveness of actions

We utilise a compliance system developed by a global content provider to monitor and assess modern slavery legislative obligations. Managers across our organisation have been delegated responsibility for maintaining and periodically reviewing our modern slavery obligations as they apply to their business units. If a potential non-compliance occurs, then it is reported, assessed, investigated, and monitored through a tailored software system. Trends and material non-compliances are reported to the Audit and Risk Committee quarterly.

We also have a robust risk management framework which enables the organisation to respond to risk in an active and live manner. Critical to the effectiveness of this framework is the use of a database that allows for live tracking of risks and the actions assigned to each. The risks identified in this document have been incorporated into the database and both actions and controls are assessed for effectiveness in regular reviews.

The business has refreshed its Code of Conduct documents for both employees and contractors, with the Code incorporating clear expectations around identifying and eliminating modern slavery. Training on the updated Code has been rolled out to the business to supplement the existing modern slavery training modules.

## 5. Consultation with subsidiaries

During the reporting period this statement covers, Unitywater consulted with key personnel of its subsidiary companies (Company Secretary and Directors) about the preparation of this statement and ensured they had an opportunity to contribute to its content.

In the event those subsidiaries contract with Third Parties, Unitywater ensures they are aware of the obligation to appropriately identify, assess and address modern slavery risks. The entities are required to comply with the Modern Slavery policies and guidelines set by Unitywater.

*This statement was approved by the Unitywater Board on 14/11/2023 and signed with their authority by Anna Jackson in her role as CEO of Unitywater.*



*Anna Jackson*

*CEO, Unitywater on 24/11/2023*

**unitywater.com**

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33 King Street, Caboolture QLD 4510

Unitywater has certification to  
OH&S ISO 45001:2015 Reg No 500000079  
Quality ISO 9001:2015 Reg No 500000079  
Food Safety ISO 22000:2018 Reg No 500000079