

# Modern Slavery Statement 2025

*Water* IS OUR LIFE

Sydney  
**WATER**

# Letter from the Sydney Water Board of Directors

The Minister  
Attorney-General's Department  
19th December 2025

It is with great pleasure that we submit Sydney Water's sixth Modern Slavery Statement to the Attorney-General's Department. This statement, covering the financial year 2024–25, has been written by Sydney Water Corporation (ABN 49 776 225 038) and approved by the Board of Directors at their meeting on 22 October 2025.

Sydney Water supports the objectives of the Modern Slavery Act 2018 (Cth) which closely align with our core corporate values. We are strongly committed to taking steps to ensure that our operations and supply chain are free from modern-day slavery practices; that as a business we do not profit from exploitation of others; and that the products and services we deliver to our 5.6 million customers are ethically sourced.

We have published the latest Modern Slavery Statement on our website, and our 2024–25 Annual Report includes a list of activities we have undertaken to demonstrate our deep commitment to ensuring modern slavery practices are reduced and, ultimately, eradicated.



Darren Cleary  
Managing Director

## 1. Who we are

This Modern Slavery Statement is made by Sydney Water Corporation (ABN 49 776 225 038) (Sydney Water) pursuant to the Modern Slavery Act 2018 (Cth) (the Modern Slavery Act) for the financial year 2024–25. We are a statutory State-Owned Corporation established under the Sydney Water Act 1994 (NSW) and wholly owned by the New South Wales Government. Sydney Water does not own or control any other entities, form part of any other trading entity or engage in joint ventures. We operate within the state of New South Wales and our head office is located at 2 Parramatta Square, Parramatta NSW.

The main services of Sydney Water are to provide water, recycled water, wastewater and some stormwater services to Sydney, the Illawarra and the Blue Mountains. In addition to these fundamental services, Sydney Water provides associated services, such as sewer service diagrams via the Sydney Water Tap in® service. Sydney Water engages in research and development projects related to the water industry and plays a key role in urban development within its area of operations. Our area of operations covers almost 13,000 km<sup>2</sup> of land, extending from the Hawkesbury River in the north to Gerroa in the south and from the Pacific Ocean in the east to Mount Victoria in the Blue Mountains in the west. Within this area we have one head office, one laboratory, 31 water resource recovery facilities, 158 water pumping stations, 701 wastewater pumping stations and 12 recycled water pumping stations.

Sydney Water has played an integral role in helping to build the modern city we see today. We are proud of our 130-year heritage and contribution to Sydney's liveability which we achieve by focusing on our three principal objectives:

- Protect public health
- Protect the environment
- Be a successful business.

### Our vision and strategy

Our vision of creating a better life with worldclass water services and our strategy deliver on the priorities that are most important to customers, while addressing complex challenges.

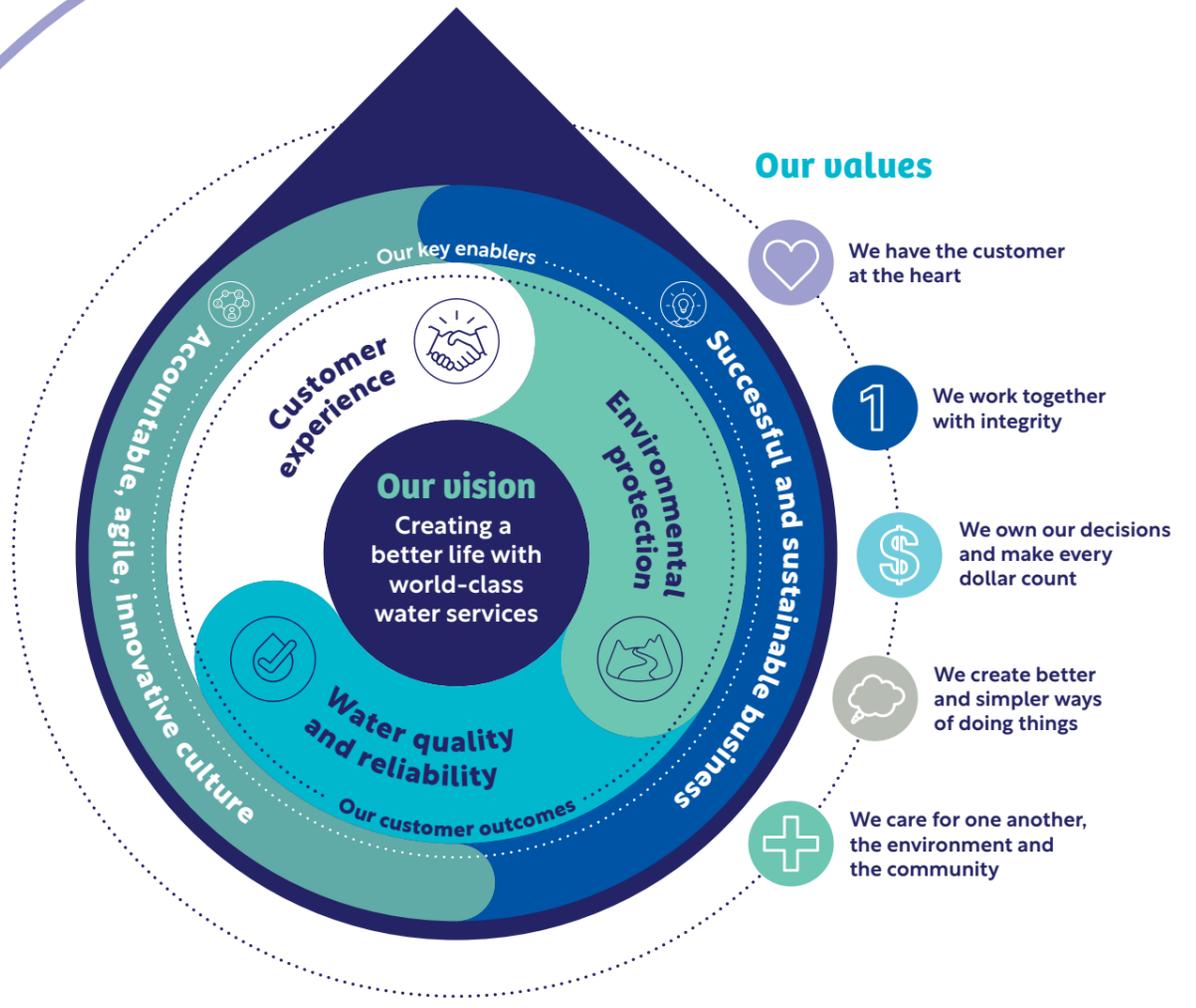
Our updated strategy responds to our customer engagement and long-term planning and now includes three customer outcomes to define what Sydney Water aims to achieve for our customers:

- Customer experience
- Water Quality and reliability
- Environmental Protection

Additionally, we are focused on two key enablers to detail how we will work to accomplish the customer outcomes:

- Accountable, agile, innovative culture
- Successful and sustainable business

We're aligning our business to be future ready and achieve our strategy by the planning and investments we make. Our investments aim to maintain and improve our services into the future reflecting what matters most to our customers, our stakeholders and the communities we serve. These investments are supported by our Long Term Capital and Operational Plan and align with our regulatory framework, Government's expectations and the priorities set out in the Greater Sydney Water Strategy. This approach underscores our commitment to keeping customers at the heart of everything we do.



**Our customer outcomes**

- Customer experience**
  - Deliver a great customer experience:
    - Fair and affordable bills
    - Positive customer experience
    - Informed and empowered customers
    - Safe swimming and recreation
- Water quality and reliability**
  - Provide safe, clean, reliable drinking water every day:
    - Safe and clean water
    - Secure water supply
    - Saving water together
    - Reliable water
- Environmental protection**
  - Ensure we protect our waterways and environment now and for the future:
    - Prevent pollution
    - Recover resources
    - Cool, green and natural places
    - Net zero carbon emissions
    - Climate resilient systems

**Our key enablers**

- Accountable, agile, innovative culture**
  - Enable our customer outcomes through an accountable, agile, innovative culture:
    - Embrace ownership and accountability
    - Foster agility and adaptability
    - Inspire and drive innovation
- Successful and sustainable business**
  - Enable our customer outcomes by being a successful and sustainable business:
    - Efficient & financially sustainable business
    - Community trusts and values us
    - Value-driven digitalisation

Figure 1. Sydney Water Strategic Outcomes and Values

## 2. Our structure, operations and supply chains

### 2.1 What we do

Every day, we supply to 5.6 million people across Sydney, the Blue Mountains and the Illawarra with safe, high-quality drinking water. We also look after wastewater and some stormwater services to help protect the health of our rivers and beaches. We construct, operate, manage and maintain systems and services for:

- Storing and supplying water (including drinking water and recycled water)
- Providing wastewater (sewerage) services and disposing of treated wastewater
- Providing stormwater drainage services in some areas.

We conduct these operations within the area of operations indicated in figure 2.

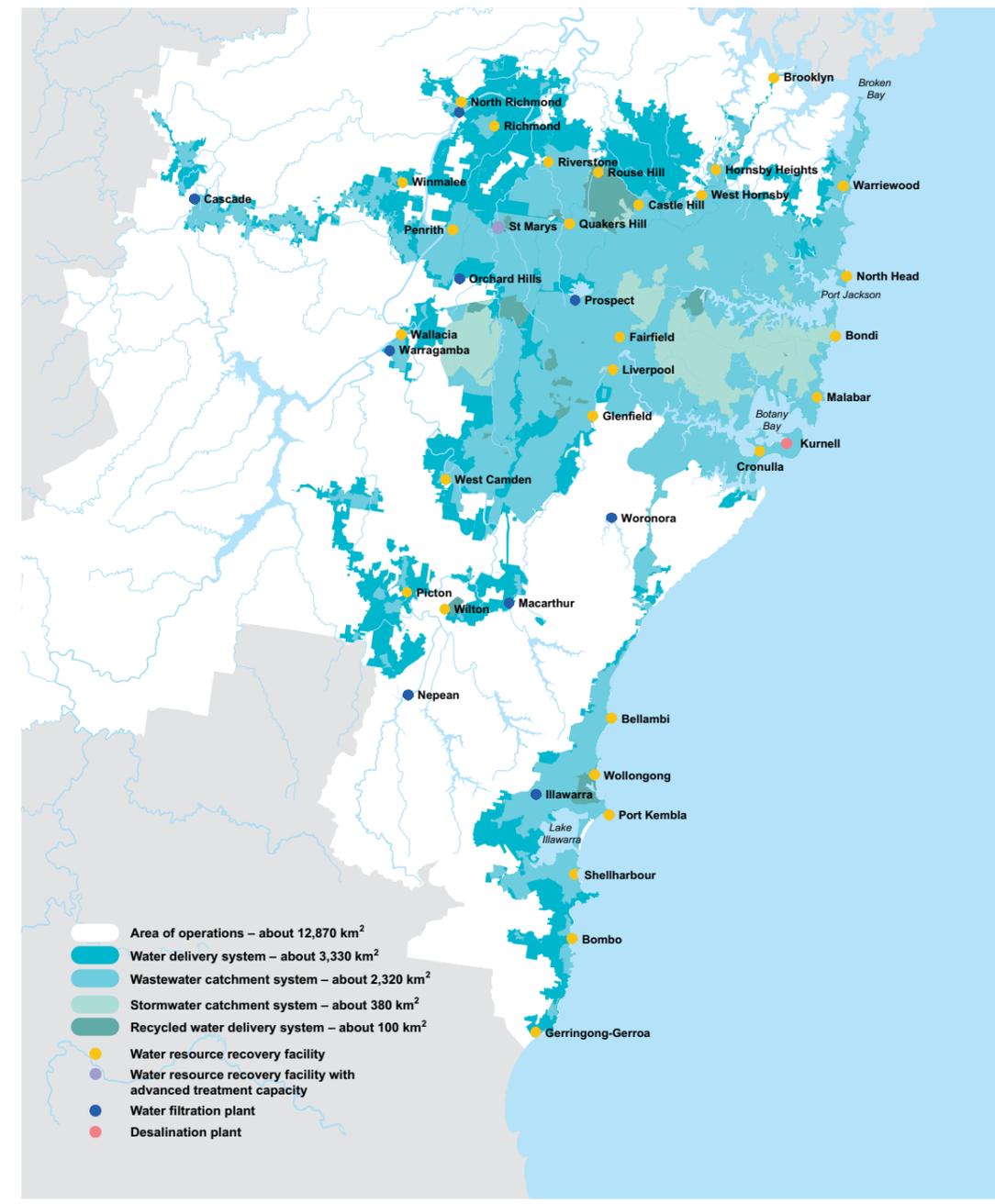


Figure 2. Our areas of operation

## 2.2 Operations

In the financial year 2024–25, Sydney Water employed or engaged:

4,011 total headcount		
3,623 Permanent full-time	242 Temporary full-time	146 Part-time
Sydney Water employs people under an enterprise agreement or individual contract of employment to supply the following services:		
<b>Drinking Water</b> Every day, we supply about 1.5 billion litres of safe drinking water to our customers.	About 80% of water comes from Lake Burragorang behind Warragamba Dam and the rest comes from a mix of other dams, the Hawkesbury–Nepean River and Sydney Desalination Plant at Kurnell.	We supply water from 11 major dams and through 13 water delivery systems with: <ul style="list-style-type: none"> <li>• 22,963 kilometres of water pipes</li> <li>• 9 water filtration plants</li> <li>• 253 reservoirs</li> <li>• 158 drinking water pumping stations.</li> </ul>
<b>Recycled Water</b> Water recycling reduces demand on water supplies. It leaves more water in our dams for drinking and reduces the amount of wastewater discharged to the environment.	Recycled water can be used to water gardens, golf courses and parks, flush toilets, wash cars, and fight fires. It can also be used for some industrial purposes and to supplement river flow. Each day we recycle about 100 million litres of water, treating it so it's safe for its intended use.	We own and operate: <ul style="list-style-type: none"> <li>• a network of 827 kilometres of recycled water pipes</li> <li>• 9 recycled water reservoirs</li> <li>• 12 recycled water pumping stations</li> <li>• water resource recovery facilities, which produce recycled water.</li> </ul>
<b>Wastewater</b> Our water resource recovery facilities collect and treat about 1.5 billion litres of wastewater each day before it's reused or released into rivers or the ocean.	We monitor all our water resource recovery facilities to protect the environment. Inland facilities treat wastewater to a high level so it can be released into rivers.	We have 24 separate wastewater systems that consist of: <ul style="list-style-type: none"> <li>• 26,996 kilometres of wastewater pipes</li> <li>• 701 wastewater pumping stations</li> <li>• 31 water resource recovery facilities.</li> </ul>
<b>Stormwater</b> Stormwater is a valuable resource that enhances Greater Sydney's liveability, sustainability and resilience.	We work with local government authorities (LGAs) to improve the health of our waterways, provide opportunities for stormwater reuse and protect our people and properties from flooding.	Our stormwater network provides services to 660,031 properties which consists of: <ul style="list-style-type: none"> <li>• 73 catchments</li> <li>• 458 kilometres of channels and pipes</li> <li>• 4 stormwater pumping stations</li> <li>• over 80 stormwater quality improvement devices.</li> </ul>
Our employees and contractors deliver these services through various activities including:		
<b>Managing our Asset Lifecycle</b> which encompasses planning, developing, designing, building and maintaining network infrastructure.	<b>Delivering our Customer Services and End-to-End Customer Experience</b> through water supply and production, laboratory services, networks field operations, water resource recovery, retail and business customer relations, billing and revenue collection services and our contact centres.	<b>Operating Equipment and Control Systems</b> to deliver reliable services to our customers.

## 2.3 Our supply chain

### Supply chain

Sydney Water procures goods and services in accordance with our corporate and procurement policies, processes and procedures. These policies and processes are applicable to all employees and contractors involved in externally obtaining goods, services and any other procurement activities, for or on behalf of Sydney Water. They set out how we plan, source and manage supply agreements and suppliers throughout the procurement lifecycle.

Procurement activities are dependent on business requirements. These can range from purchase orders and purchasing cards for low-risk purchases to formal multimillion-dollar contracts using our “source-to-contract” process for high-risk and high-spend projects.

Our expenditure in the financial year 2024–25 was in the following categories:

<b>FY 2024–25</b> Total Spend Breakdown by Category	<b>51.66%</b> <b>Construction and works</b> Covering construction project management services, construction services and professional engineering services	<b>5.34%</b> <b>Corporate Services</b> Covering corporate support related expenses such as insurances, legal and management consulting services etc.
	<b>12.62%</b> <b>Water Supply and Testing Services</b> Biggest spend with Sydney Desalination Plant and WaterNSW	<b>5.23%</b> <b>Outsourced Treatment Services</b> Covering outsourced treatment plants and networks, wastewater treatment and water filtration treatment services
	<b>8.54%</b> <b>Employee Expenses, Reimbursements and Benefits</b> For the purposes of analysing our supply chain, we have excluded this category.	<b>3.83%</b> <b>Civil Services</b> Covering equipment hire, network repairs and maintenance etc.
	<b>12.78%</b> <b>Others</b> Covering information technology, chemicals, maintenance and equipment, regulatory fees and government charges, utilities etc..	

Sydney Water publishes the details of any [active contract](#) between Sydney Water and a private-sector contractor signed after 1 July 2010 that is above the value of \$150,000 and involves the contractor doing a specific project such as construction, infrastructure or property development, the contractor agreeing to provide specific goods or services, or the transfer or lease of real property.

### Geographical distribution of suppliers

Around 99.9% of our total spend was within Australia during the reporting period. The remaining expenditure can be attributed to various international suppliers in countries with a low prevalence of, and low to medium vulnerability to, modern slavery. We acknowledge, however, that there is a possibility that the source countries for these goods and services may be countries with a higher prevalence of or vulnerability to modern slavery. The majority of the spend with our international suppliers was in relation to software licenses and maintenance, management consulting services, processing equipment, asset investment planning and IT professional services.

Table 1 sets out the modern slavery prevalence and vulnerability scores with respect to the main countries from which Sydney Water procured goods and/or services during the reporting period:

Country	Prevalence (/1,000)	Vulnerability (/100)	Total Spend %
Australia	1.6	6.8	99.90%
United States	3.3	24.5	0.030%
UK	1.8	14.3	0.016%
Canada	1.8	10.7	0.013%
Ireland	1.1	9.3	0.003%
Netherlands	0.6	6.0	0.003%
New Zealand	1.6	7.8	0.002%
Latvia	3.4	16.8	0.002%
Israel	3.8	35.4	0.001%

Table 1. Modern Slavery Prevalence and Vulnerability scores in Sydney Water's Supply Chain based on Global Slavery Index 2023

### 3. Risks of modern slavery practices in our operations and supply chains

#### Operations

At Sydney Water, approximately 90% of our employees work on permanent full-time arrangements. Approximately 6% of our workforce are on temporary full-time arrangements while we have approximately 4% on part time arrangements. We operate entirely in Australia with offices located around Greater Sydney.

Sydney Water has various policies and instruments in force to address the risks of modern slavery in our operations, some of which have been updated during the reporting period. The relevant policies and instruments in place include:

#### Remuneration Policy

Ensures the remuneration of all employees, permanent, temporary and part-time is managed on a fair and equitable basis and in line with organisational objectives.

#### Safety, Health and Wellbeing Policy

Aims to create an environment in which people have the autonomy to use their insight, knowledge and expertise to keep themselves, their colleagues and the community safe, healthy and well. This policy applies to all workers including contractors, visitors, customers, partner agencies and others who may be involved in or affected by Sydney Water activities.

#### Flexible Working Policy

Encourages positive physical and mental health, supports people with carer's responsibilities and aims to make Sydney Water a great place to work with high engagement, wellbeing and job satisfaction.

#### Parental Leave Policy

Provides employees with access to parental leave, including paid leave for the birth or adoption of a child into their immediate family.

#### Enterprise Agreement

The Terms and Conditions of our Enterprise Agreement provide for limitations on hours of work to ensure rest breaks, overtime, and leave entitlements.

#### Overtime Policy

Addresses reasonable overtime outside of usual hours of work.

#### Fair Treatment (Grievance Resolution) Policy

Provides a set of principles for resolving grievances where an employee feels they have been dealt with unfairly, discriminated against or dealt with in an unjustified manner.

#### Sick Leave Policy

Protects the health, safety and wellbeing of our employees and members of the community by supporting our employees who are unwell or injured and unable to perform their duties.

#### The very human story of Sydney Water

Covers what we stand for at Sydney Water and what to expect from working at Sydney Water with a clear explanation of our shared commitments and non-negotiables.

#### Workplace Conduct Policy

Defines acceptable conduct and standards of behaviour in the workplace and ensures all employees are treated equitably and are not subjected to discrimination, harassment, bullying or violence.

#### Wrongdoing Reporting Policy

Aims to establish an internal reporting system for staff to report alleged wrongdoing in Sydney Water without fear of reprisal.

Sydney Water has systems in place to ensure that these policies and instruments are complied with. The risk of modern slavery practices in our own operations is, therefore, very low.

#### Supply Chains

In financial year 2024-25, we started to adopt the Inherent Risk Identification Tool (IRIT) version 1.1.2 based on the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps (GRS). The tool measures the level of modern slavery risk inherent from procurement categories based on the following factors: authoritative determinations, vulnerable populations, supply chain model and regulatory context. More information on GRS and IRIT is available from the NSW Government's [Communities and Justice website](#).

The GRS classifies modern slavery risks into four different levels determined by reference to the presence of risk factors in the production and supply of particular procurement categories: minor, low, moderate and high.

Using the IRIT tool, our total spend in financial year 2024-25 for each level of modern slavery risk was as follows:

IRIT Risk Level	Financial year 2024-25 Spend Breakdown	Financial year 2024-25 Spend Category
Minor	57.85%	Includes: Chemicals, Civil Services, Construction Project Management Services, Professional Engineering Services, Corporate Services, Benefits, Reimbursements, Medical, IT Infrastructure, IT Professional Services, Software Licenses and Maintenance, Telecommunications, Maintenance and Equipment, Operational and Facility Services, Outsourced Treatment Services, Regulatory fees and government charges, Utilities, Water Supply and Testing Services
Low	40.49%	Includes: Network Plumbing Services, Roadworks, Construction Services and Works, Recruitment Services, Pipe Blockage, Electrical and Electronic Supplies, Electrical Services
Moderate	0.42%	Includes: Postage and Courier Services, Building Modifications and Fitouts, Building Repairs & Maintenance
High	1.15%	Includes: Catering, Uniforms and PPE, Fleet Management, IT Hardware Systems, Telecommunication supplies and services, Cleaning and Hygiene Services, Industrial cleaning supplies and services, Security Services
Exempt	0.09%	Includes: Payment to our customers

The risks of modern slavery in the areas of high risk spend can be described as follows:

Categories	Risk Description
<b>Catering</b>	Is a high-risk area of our spend as the hospitality and fresh fruits industries may involve poor working conditions including, but not limited to, wage theft and inadequate record keeping, especially for people on temporary work visas and migrant workers
<b>Uniforms and PPE</b>	Includes the purchase of uniforms and hard hats as well as hand, body and respiratory protection. We purchase these goods from suppliers that could be sourcing and manufacturing goods from countries overseas with relatively high modern slavery risks.
<b>Fleet Management</b>	The procurement of vehicles and fleet management services can involve risks of modern slavery in the manufacturing supply chain, particularly in the sourcing of raw materials (e.g. rubber, metals, and electronics) and the production of vehicle components. Labour exploitation may also occur in logistics and maintenance services.
<b>IT Hardware Systems</b>	The Global Slavery Index has labelled laptops, computers and mobile phones imported by Australia from China and Malaysia as the highest value at-risk products for modern slavery, with the Global Slavery Index identifying cases of forced labour in the electronics manufacturing industries in these countries
<b>Telecommunication Supplies and Services</b>	The production of telecommunications equipment (e.g. mobile phones, routers, and cables) often involves complex global supply chains, with risks of forced labour in the extraction of raw materials (e.g. cobalt and rare earth minerals) and manufacturing processes.
<b>Cleaning and Hygiene Services; Industrial Cleaning Supplies and Services</b>	The cleaning industry is recognised as a high-risk sector for modern slavery, particularly in the use of low-skilled labour, subcontracting arrangements, and the sourcing of cleaning chemicals and equipment. Workers may be vulnerable to exploitation, including underpayment, excessive working hours, and unsafe conditions.
<b>Security Services</b>	Security services often involve low-skilled labour, with risks of exploitation through underpayment, excessive working hours, and poor working conditions. Subcontracting arrangements may further obscure labour practices.

## 4. Actions taken this year to assess and address modern slavery risks

### 4.1 Procurement Framework

Our Procurement Framework sets out the foundation, scope and structure of the procurement process at Sydney Water.

Further information regarding our Procurement Framework and Procurement Policy is detailed in our [Modern Slavery Statement for 2021-22](#).

#### Procurement processes

As part of our Procurement Framework, we have defined processes across the procurement lifecycle from planning, sourcing and purchasing to managing contracts and suppliers.



Figure 3  
Procurement Processes at  
Sydney Water

#### 1. Plan

As part of the planning stage, we take the opportunity to conduct a risk assessment. The outcome of the risk assessment together with the total value of the procurement is used to work out the most appropriate procurement pathway or market approach. In addition to risk assessments, a procurement strategy may be required for medium or high risk and/or high value procurement activity. The procurement strategy outlines the market analysis and evaluation criteria and procurement staff have the discretion to take modern slavery risks into consideration where appropriate. The procurement strategy is subject to approval in accordance with Sydney Water's delegation manual.

#### 2. Source

When a tender exercise is conducted, the tender document sets out the requirement for suppliers to supply information in respect of modern slavery to Sydney Water. This includes actions taken to assess and address modern slavery risks and willingness to work with Sydney Water to address the risks.

### 3. Purchase

As part of our pay process, approval in accordance with our delegation manual is required before a purchase requisition is converted to a purchase order. This approval step exists and is enforced for numerous reasons, including ensuring that the purchase order complies with and meets the objectives set out in the procurement policy.

Our purchase order is governed by Purchase Order Terms and Conditions which cover several aspects of modern slavery including:

- prohibiting suppliers to engage in any activities, practices or conduct that would constitute an offence under Modern Slavery laws
- requiring suppliers to thoroughly investigate their labour practices and those of their subcontractors and direct suppliers to ensure that there is not any activities, practices or conduct being engaged in that would constitute an offence under Modern Slavery laws
- requiring suppliers to put in place all necessary processes, procedures and compliance systems to ensure they comply with Modern Slavery laws.

### 4. Manage Contracts

Sydney Water's Contract Management Operating Model is designed to enable Sydney Water to manage contracts effectively and consistently across the organisation. Further information regarding our Contract Management Operating Model is set out in our [Modern Slavery Statement for 2021-22](#).

The Contract Management Operating Model enables Sydney Water to have better visibility over our contract activities, the suppliers we engage with and the practices within the community.

Sydney Water has also implemented Modern Slavery clauses in our supplier contracts. These clauses include requirements that the supplier:

- not engage in activities and practices that would constitute an offence under Modern Slavery laws inside or outside of Australia
- comply with obligations under the Modern Slavery laws and equivalent legislation
- implement processes, procedures and compliance systems to ensure compliance with Modern Slavery laws
- provide information to enable Sydney Water to comply with its own Modern Slavery requirements.

### 5. Manage Suppliers

As part of our supplier management process, we continue to undertake the following processes:

- **Supplier due diligence**  
Sydney Water engages a third-party provider to conduct due diligence on our suppliers. The due diligence process provides information on the location of the supplier, its controlling entity and any legal action pending against the supplier or its directors.
- **Supplier registration**  
For any supplier to transact with Sydney Water, they must complete our supplier registration process to create their profile on our procurement system. As part of the registration process, suppliers are required to confirm that they have read, understood and agree to comply with the Modern Slavery Act. Non-compliance is subject to review by the procurement and supply chain team and may result in a supplier's registration being denied. In addition, suppliers are also required to confirm that they have read, understood and comply with Sydney Water's Supplier Code of Conduct which includes Sydney Water's expectations with respect to modern slavery, labour and human rights.
- **Supplier prequalification**  
We have implemented a supplier prequalification process where suppliers are required to confirm and prove that they meet Sydney Water's minimum requirements. As part of the process, we ask suppliers to confirm if they have a Modern Slavery Policy or program in place and where possible, to provide evidence to substantiate their claim.

## 4.2 Risk Monitoring and Remediation processes

We monitor the modern slavery risks in our existing supply chain by:

- monitoring news and market updates that may involve modern slavery incidents with suppliers that we are currently using or in our database
- including modern slavery as part of corruption hotline triage and reporting. The [corruption hotline](#) is publicly available on our website.

Once we identify a modern slavery risk or incident, we then apply a remediation process depending on the source of the risk or incident identification. The remediation process can be one of the following:

- If the risk or incident is identified through a news or market update or the corruption hotline, Sydney Water will take steps to engage with internal stakeholders and the supplier to mitigate the risk or resolve the incident, in accordance with its various processes including those set out in its Supplier Profiling and Due Diligence Framework, Wrongdoing Reporting and Assurance Management.
- If the risk is identified through pre-contract award risk assessment, the responsible purchasing officer will be required to conduct further inquiries into the supplier's practices and operations regarding modern slavery, to determine the impact of the risk identified on the contractual relationship going forward.

## 4.3 Actions taken this reporting period to address modern slavery risks

	<p><b>Alignment with NSW Anti-slavery Commissioners guidance on reasonable steps to manage modern slavery risks in operations and supply chains</b></p>	<p>We engaged with the Office of the NSW Anti-slavery Commissioner and implemented some of the recommendations mentioned in the Commissioner's Guidance on Reasonable Steps.</p>
	<p><b>Collaboration with water and non-water companies across australia</b></p>	<p>We continued our active engagement with other companies across Australia to share best practices, discuss common issues, current legislation and standardise our approaches. We also expanded our engagement to other companies in other sectors.</p>
	<p><b>Online solution to conduct modern slavery risk assessment focusing on our suppliers</b></p>	<p>We conducted modern slavery risk assessments using an online Modern Slavery Platform for suppliers classified as having high modern slavery risk.</p>

### 1. Alignment with NSW Anti-slavery Commissioner's Guidance on Reasonable Steps to manage modern slavery risks in operations and supply chains

In December 2023, the Office of the NSW Anti-slavery Commissioner published its Guidance on Reasonable Steps (GRS) to manage modern slavery risks in operations and supply chains. As mentioned in our financial year 2023-24 statement, Sydney Water's intention for financial year 2024-25 was to further deep dive into the GRS, IRIT (Inherent Risk Identification Tool), and other tools developed by the Office of the NSW Anti-slavery Commissioner, to align our supply chain processes with its guidance.

We reviewed each of the 7 Reasonable Steps outlined in the GRS; Commit, Plan, Source, Manage, Remedy, Report and Improve, compared them with our current processes and practices and identified necessary actions to align wherever feasible:

Financial year 2024–25 action	Alignment with GRS
Identified and assessed modern slavery risks by mapping procurement categories of goods and services using the IRIT tool version 1.1.2 – see section 3 'Risks of modern slavery practices in our operations and supply chains' above for further details.	Commit, Plan
Reviewed and updated our procurement policy to ensure modern slavery aspects are more clearly stated.	Commit
Continued close engagement and collaboration with other water industries across Australia through the modern slavery community of practice coordinated by Water Services Association of Australia (WSAA) and companies from non-water industry to share best practices – see 2 'Collaboration with water and non-water companies across Australia' below.	Commit
Partnered with our Internal Audit department to assess the veracity of the selected claims made in the modern slavery Statement, with no significant issues identified in the audit.	Commit
Reviewed and updated our Supplier Code of Conduct to include clearer expectations on our suppliers with regards to modern slavery which are also consistent with the NSW Supplier of Conduct.	Source
Reviewed and updated our prequalification process to take into account those high-risk categories in the IRIT and information required.	Source
Selected suppliers identified in the high-risk categories and assessed them using the online Modern Slavery Platform we implemented together with other WSAA members – see 3 'Online solution to conduct modern slavery risk assessment focusing on our suppliers' below.	Source
Reviewed and updated modern slavery clauses in our tendering documents to align with Appendix I – GRS Model Tender Clauses and in our contracting documents to align with Appendix J – GRS Model Contract Clauses.	Source
Submitted report on the reasonable steps taken as per Appendix K – GRS Annual Reporting Template using online GRS Annual Reporting Form and as stand-alone report in our external website.	Report
Continued engagement with the NSW Anti-slavery Commissioner for updates and guidance to align with the GRS.	Improve

## 2. Collaboration with water and non-water companies across Australia

This year, we continued our engagement in the modern slavery community of practice (COP) and collaboration with other water companies across Australia through the WSAA. Several common themes were discussed by various water companies including concerns around the suppliers' engagement fatigue of having to continuously provide data, reporting and information; challenges in getting visibility to Tier 2 and 3 suppliers; the potential of using Artificial Intelligence to obtain more rigorous data and information around modern slavery risks; seeking more updates from relevant officials regarding modern slavery content, and strategies to obtain insights into the supplier selection process and how to evaluate suppliers during procurement activities.

In addition to the engagement through the COP, we have also started engagements with other companies outside of this group. The engagements covered various areas including sharing effective strategies to enhance transparency and due diligence, monitoring contractual obligations, reporting mechanisms, supplier engagement strategies, resources for best practices and ongoing challenges faced in modern slavery compliance.

We also participated, having been invited to do so, in the "Optimising Remediation of Slavery in Supply Chains Through Victim-Centred Decision Design: An Experimental Approach" research project facilitated by RMIT University. Participation involved completing a brief activity followed by a series of questions, as part of an online experiment. The research project aims to test what solutions might help improve remediation of modern slavery incidents and produce insights and recommendations for how modern slavery law and policy can drive better remediation. Participants in the research project included individuals who, in their current role, play some part in deciding how their organisation will respond to slavery in their supply chains if suspected or confirmed. We understand that the results of the research project are to be written up in a white paper to be shared with non-academic audiences, and will also be shared through presentations and webinars.

## 3. Online solution to conduct modern slavery risk assessment focusing on our suppliers

As mentioned in the financial year 2023–24 statement, Sydney Water has partnered closely with Informed 365 for the online solution developed to assess and manage modern slavery risks in our supply chain for the purposes of the Modern Slavery Act 2018 (Cth) and this online solution is shared with other water companies across Australia through the WSAA. This tool was designed to assess and address modern slavery risks, including due diligence processes through supply chains when data indicates higher risk areas, grievance mechanisms for human rights and modern slavery and awareness of them, human rights and modern slavery communications, education and awareness, pathways for continuous improvement arising through supplier completion of supplier assessment questionnaires and risks of harm to people through modern slavery and how these risks can be reduced.

In financial year 2024–25 we started to use the tool to conduct risk assessment of our suppliers across different categories to get a better understanding of their modern slavery risk levels, maturity and effectiveness in managing the risks. We started to use the online solution tool with our suppliers focusing on 4 main areas of assessment of suppliers: about the organisation, governance & control, operations & supply chains and employment conditions. We have completed the online assessment of 168 suppliers, none of which were assessed as having high modern slavery risk. The suppliers assessed included those classified as having high inherent modern slavery risk level as per the IRIT tool version 1.1.2, ranging from information and communication technology, cleaning, catering and uniforms suppliers.

In addition to using the online solution tool, we collaborated closely with Informed 365 and other users from the WSAA. We met monthly between July 2024 and June 2025 to collaborate around how Australia's water services and utilities sector can use the Informed 365 tool to address modern slavery risks.

We also invited guest speakers and subject matter experts, including:

- the CEO and Founder of the Freedom Hub, detailing their work with organisations of all kinds, the meaningful engagement of people with lived experience and opportunities to engage with the work of the Freedom Hub; and
- representatives from the Office of the NSW Anti-slavery Commissioner, speaking about their work and outlining the GRS and IRIT.

It is our intention to continue using this online tool to assess more suppliers and to collaborate with Informed 365 and other water companies for improvements, knowledge sharing and better ways to use the data collected.

## 5. How we assess the effectiveness of our actions

---

Sydney Water applies an assurance management process to review and manage modern slavery risks in our operations and supply chains which is coordinated through the three lines of assurance (3LOA) model. These are:

- Line 1 - Management control – assurance activities conducted by those responsible for managing controls to mitigate risks. This involves consulting with SMEs and those performing risk mitigation controls to ensure they are in place and operating effectively.
- Line 2 - Management oversight – assurance activities conducted to support the first line. This includes management system audits and/or, uplifting control assessment processes. This is to ensure that risks are managed within the Board's appetite.
- Line 3 - Independent oversight – provide independent assurance to the Board and Executive that first and second line are operating effectively. These assurance activities are conducted or managed by the Internal Audit Team.

To ensure we are effectively assessing and addressing modern slavery risks in our supply chain, Sydney Water:

- monitors the modern slavery awareness training participation rate across the procurement and supply chain team. We continuously communicate the need to complete the training, especially to new hires, through various communication channels, including newsletters and team meetings
- monitors a supplier's confirmation of their compliance with the Modern Slavery Act 2018 (Cth) prior to the onboarding confirmation
- monitors the supplier prequalification approval rate. The pre-qualification approval takes into consideration whether suppliers have approved policies and procedures that outline their approach to mitigate and report on modern slavery in their operations and supply chain
- continually assesses its engagement processes with suppliers
- monitors a fit-for-purpose, centralised mailbox for anonymous reporting of modern slavery incidents
- if made aware of any supplier that may be subject to a modern slavery risk or incident within their operations or supply chain, will contact the supplier for further information and take responsive action where appropriate.

## 6. Consultation

---

Sydney Water does not own or control any other entities, form part of any other trading entity or engage in joint ventures. As such, Sydney Water does not engage in any process of consultation with any other entities in respect of its Modern Slavery Statement.

## 7. Other relevant information

---

The Modern Slavery Act 2018 (NSW) (NSW MS Act) places the following further obligations on Sydney Water:

- a statement to be included in the Sydney Water Annual Report on the steps taken to ensure goods and services procured were not the product of modern slavery and addressing any issues raised by the NSW Anti-slavery Commissioner
- annual publication of the Modern Slavery Statement on our website
- provide the NSW Anti-slavery Commissioner with written notice that the Modern Slavery Statement has been published on our website.

We include a Modern Slavery section that addresses the NSW MS Act requirement in the Sydney Water Annual Report.

Additionally, we share data directly with the Office of the NSW Anti-slavery Commissioner using the GRS Annual Reporting online form.

## 8. Approval and signature

---

This Modern Slavery Statement was approved by the Sydney Water Board of Directors in their capacity as principal governing body of Sydney Water at their 22 October 2025 meeting, and is signed by Darren Cleary, Managing Director on the first page of this statement.



**Contact us**

Call us on 13 20 92

Write to us at Sydney Water PO Box 399, Parramatta NSW 2124

Report a leak or fault on 13 20 90

Visit us online at [sydneywater.com.au](http://sydneywater.com.au)

**Follow us**

[facebook.com/sydneywater](https://facebook.com/sydneywater)

[@SydneyWaterNews](https://twitter.com/SydneyWaterNews)

[sydneywater](https://www.sydneywater.com.au)

SW 143 12/25 Modern Slavery Statement

Sydney  
**WATER**