

**2024-2025**

# **Modern Slavery Statement**

# Letter from the WaterNSW Board of Directors

The Commissioner  
Attorney-General's Department  
Australian Government

[Date]

Submitted online at <https://modernslaveryregister.gov.au/>

Dear Commissioner

On behalf of WaterNSW, I am pleased to present our Modern Slavery Statement for the financial year ending 30 June 2025, prepared in accordance with both the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW).

This Statement outlines the actions taken by WaterNSW and its wholly owned subsidiary, WaterNSW Infrastructure Pty Limited (the Group), to identify, assess and mitigate the risks of modern slavery within our operations and supply chains.

In alignment with our organisation's core values of Value our People and Drive Change, WaterNSW is fully committed to the intent and objectives of the Modern Slavery Acts. WaterNSW opposes all forms of slavery and forced labour and are dedicated to upholding ethical, fair and safe practices across our operations and those of our suppliers.

This Statement was formally approved by the Board of WaterNSW at its meeting held in November 2025.

Yours sincerely,



Peter Duncan AM  
Chair



# About WaterNSW

## Who we are

We are the people taking care of the state's water at the source – capturing, storing, delivering.

With 41 major dams and hundreds of waterways across the state, we play a vital role at the source of the state's water, delivering two thirds of all water used in NSW.

WaterNSW is a State-Owned Corporation and one of the main government agencies tasked with managing water in NSW. We follow the government rules and regulatory frameworks, implementing the rules to deliver water when and where it is needed.

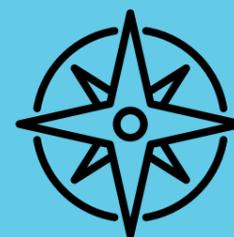
Our people are dam safety specialists, operators, engineers, catchment protectors, water quality experts, hydrologists, scientists, and licensing and customer service experts, amongst a range of other expertise.



Tallowa Dam

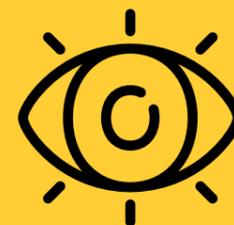
## WaterNSW has a number of main functions involved in capturing, storing and delivering water:

- We manage dams like Burrendong, Chaffey and Warragamba, and protect the Greater Sydney drinking water catchment.
- We supply water to customers, communities and the environment.
- We build, maintain and operate essential infrastructure.
- We service customers – from farmers to local councils – providing support for water licensing and approvals, trades and billing, to meet their water needs.
- We own and operate the largest surface and groundwater monitoring network in the southern hemisphere.



### Our purpose

Water, delivered when and where it matters.



### Our vision

To support the resilience of NSW communities through our leadership in delivering water services, for generations to come.

## Our strategic priorities

We have five strategic priorities that are targeted to guide us in achieving our purpose and vision.

- **Delivering operational excellence:** safe, reliable, affordable water services through technical and operational excellence.
- **Developing our people and capabilities:** diverse, high performing workforce responsive to customer and community needs.
- **Respected by the customers and communities we serve:** trusted to support social, cultural and economic prosperity of customers and community through transparency and community presence.
- **Working together in partnership:** committed to working in partnership with stakeholders to manage sustainable, secure and healthy waterways.
- **Building a sustainable future:** our part in creating a more resilient water system to enable thriving communities while reducing our environmental footprint.

## Our values

Our values are the principles and behaviours that drive us to succeed as both teams and individuals at WaterNSW. They reflect who we are and what we represent.

Our values support us to achieve a high-performance culture. They support our shared vision and enable us to deliver quality outcomes to our customers, communities and shareholders. We live our values and are measured by them.



## We're expert operators

WaterNSW operates the state's dams, capturing and storing water, and then supplying it ready for distribution – for the environment, agriculture, industry and the community.

The water we supply is used by more than 8 million people across NSW. Our customers range from small family businesses to farmers, irrigators, councils, utilities, industry and the environmental water holders like the State and Australian Governments who use water to protect our ecosystems and keep rivers flowing.

Every day we operate our assets and manage water responsibly to meet the needs of our customers and communities, now and into the future.



## Our corporate governance structure

WaterNSW is constituted as a statutory State-Owned Corporation (SOC) under the *State-Owned Corporations Act 1981* (NSW) and under the *Water NSW Act 2014* (NSW).

WaterNSW operates under an Operating Licence granted by the Independent Pricing and Regulatory Tribunal (IPART).

WaterNSW Infrastructure Pty Ltd is a wholly owned subsidiary of WaterNSW. It does not employ anyone directly.

This Modern Slavery Statement covers both entities of the WaterNSW Group.

We are regulated by several regulators, including but not limited to:

- The IPART for operating licence compliance and customer pricing, and
- The Natural Resources Access Regulator (NRAR), for compliance with the regulatory framework for water including water management rules.

## Our governance structure:

### Voting Shareholders / Shareholding Ministers of WaterNSW

- NSW Treasurer
- NSW Minister for Finance and Natural Resources
- Shareholders and share capital established under *20H State Owned Corporations Act 1989* (NSW)

### Portfolio Minister of WaterNSW

- NSW Minister for Water, Housing, Homelessness, Mental Health and Youth
- Role of Portfolio Minister established under *20I State Owned Corporations Act 1989* (NSW)
- May give directions to WaterNSW in consultation with the Treasurer or shareholding ministers (subject to the *State Owned Corporations Act 1989* (NSW), *WaterNSW Constitution*, *Water NSW Act 2014* (NSW)).

### WaterNSW Board of Directors

- Directors are appointed by the voting shareholders (section 8 *Water NSW Act 2014* (NSW))
- Board complies with NSW Treasury Policy TPP 17-10: *Guidelines for Governing Boards of Government Businesses*
- Accountable to the Voting Shareholders (see section 10 *State Owned Corporations Act 1989* (NSW) and the *WaterNSW Constitution*).
- Subject to the direction of the Portfolio Minister (*WaterNSW Constitution* clause 5.5 (d)(i)).

### WaterNSW

Statutory State-Owned Corporation – Parent Entity

- Established under the *Water NSW Act 2014* (NSW) and Schedule 5, *State Owned Corporations Act 1989* (NSW).
- Functions specified in *Water NSW Act 2014* (NSW) and pursuant to Operation Licence (issued by IPART).
- Subject to *WaterNSW Constitution*.

### WaterNSW Infrastructure Pty Ltd

(controlled entity – wholly owned subsidiary)

Established 5 November 2018 under the *Corporations Act 2001* (Cth) as a wholly owned subsidiary of WaterNSW to provide bulk water transmission services for the supply of raw water to Essential Water in Broken Hill as the local water provider.

Operates under the commercial disciplines of the NSW Government's Commercial Policy Framework.

# Introduction

WaterNSW is committed to acting ethically, with integrity and transparency in all our business dealings, and to implementing effective systems and controls to safeguard against any form of modern slavery taking place within our operations or our supply chains.

Our modern slavery initiatives are part of our wider Building a Sustainable Future strategic priority that helps us achieve this purpose. WaterNSW will not tolerate any form of human rights abuse within our business or supply chains.

This statement covers our operations and supply chains and looks at the steps we are taking to combat the risk of modern slavery and human trafficking within our organisation.

**No instances of modern slavery have been identified in our operations or supply chains during FY25, nor have we received any reports of potential instances of modern slavery from our staff, customers, or suppliers.**

We are not complacent and remain committed to keeping our approach under continual review.

## Highlights of what we achieved during the 2024-25 Financial Year



**Developed and published our Modern Slavery Policy** to demonstrate WaterNSW's commitment to preventing modern slavery in its operations and supply chains. The Policy was approved by the Board in May 2025.



**Completed a gap analysis** against the NSW Anti-slavery Commissioner's Shared Implementation Framework, specifically the Guidance on Reasonable Steps which defined our action plan for FY25. As a result, we revised our procurement category risk mapping by utilising the NSW Procurement Modern Slavery Inherent Risk Identification tool to enhance the identification of high-risk spend. Greater emphasis has been placed on raising overall awareness through mandatory training and refresher sessions. Furthermore, we are integrating updated risk classifications aligned with WaterNSW categories and have developed a Power BI tool to dynamically monitor high and moderate risk contracts. The central procurement team is proactively managing risks associated with high-risk engagements, while flagged higher-risk contracts are incorporated into health audits to ensure ongoing and comprehensive modern slavery risk management, in better alignment with the NSW Anti-Slavery Commissioner's Shared Implementation Framework.



**Promoted details of our Whistleblowing Solution ("Your Call")** on our communication TV as you enter our Head Office at IPSQ visible to all staff, contractors and visitors.



**Reviewed and updated our Supplier Code of Conduct** to remind suppliers of expectations when conducting business with WaterNSW and to provide details of the Whistleblowing Solution ("Your Call") used to receive and manage reports of possible breaches with impartiality and confidentiality. 100% of our contracted suppliers are signed up to our Supplier Code of Conduct.



**76% positive perception of employee sentiment towards reporting unethical behaviour** in our Pulse employee engagement survey - down 1% from 2024.



**Continued supplier engagement and awareness** through risk assessment questions within the tender process, updated contract templates and modern slavery information made available on our website.



**Developed a PowerBI report** to provide spend and supplier analysis to identify our high risk categories for modern slavery.



**Joined Water Services Association of Australia Modern Slavery Community of Practice** to collaborate and foster responsible business practices, and show leadership in identifying and addressing modern slavery in supply chains.



**Continued our commitment to raising awareness and ensuring our people are adequately informed** about modern slavery and their role in identifying and mitigating risks.

## Governance



Our established Modern Slavery Working Group drives the development and delivery of our approach across WaterNSW. Representatives from across the business ensure our policies, processes, and practices are aligned to eliminate the risk of modern slavery. The Working Group also engages with the business to produce the Modern Slavery Statement on behalf of WaterNSW. It includes senior leadership representation from core functions key to driving change, including Procurement, Audit, Risk and Compliance, Safety, People and Culture and Legal.

The Executive Manager Finance, Legal & Risk has overall responsibility for our approach to modern slavery and is provided with updates on our approach and progress against our action plan.

The WaterNSW Board and Audit & Risk Committee provides rigorous challenge to management and ensures WaterNSW maintains an effective risk management and internal control system. They oversee and endorse the Modern Slavery Statement for the Board's approval annually.



## Our operations

Our values and policies are the foundation on which we operate. WaterNSW maintains and regularly updates a comprehensive Code of Conduct that defines the standards of behaviour expected from employees, contractors, and directors acting on behalf of the organisation. The Code is supported by a range of relevant policies, procedures, and industrial instruments to ensure consistent and ethical practices across all parts of the business.

One key component of the Code is its focus on modern slavery. To this end, modern slavery is addressed within the online Code of Conduct eLearning module, which provides clear guidance on identifying, mitigating, and reporting modern slavery risks. The module includes a high-level overview of modern slavery, a brief quiz to reinforce understanding, and a direct link to the WaterNSW Modern Slavery Statement. The Code of Conduct eLearning is mandatory for all employees and contractors upon commencement and refresher training is required every two years thereafter. In FY25, 391 employees were assigned the Code of Conduct eLearning course, with 319 or 81% successfully completing the course.

**We encourage reporting of any suspected wrongdoing through a process designed to support openness and confidentiality.**

WaterNSW continues its partnership with "Your Call Whistleblowing Solutions" (Your Call), an independent service that receives and manages reports with impartiality. This service allows employees, contractors, and other users to choose their level of anonymity—whether remaining completely anonymous, identifying themselves only to Your Call, or identifying themselves to both Your Call and WaterNSW.

As part of our regular employee engagement survey, we ask "I can report an instance of unethical conduct without fear of retribution." While broad in scope, this question provides insight into employee confidence in reporting unethical behaviour, including concerns related to modern slavery. This year, 76% of respondents expressed a positive perception, reflecting a slight decrease of 1% from 2024 and down 2% from 2023.

## Our people

Safety is our number one priority. Our vision is that together, we will create an injury and illness-free workplace where everyone goes home safe and healthy each day of their working life. The nature and locations of many of our operations mean that we operate in hazardous environments. Constant vigilance is required to deliver our safety objectives.

We all have a shared responsibility for keeping ourselves, our fellow workers, and the public safe. This includes directors, employees and contractors. Together we fulfil legal and moral responsibilities by:

- looking out for the safety and wellbeing of people around us including the public
- working safely at all times to protect ourselves and others
- ensuring that the work environment, plant and equipment are safe and maintained
- identifying, reporting and recording all hazards, incidents, near misses or safety concerns to help prevent harm to others (employees, contractors, visitors and the public) in the workplace
- participating in relevant hazard and risk management activities including being prepared to cease unsafe work
- complying with the WaterNSW Critical Risk Controls, Safety Commitments, Work Health & Safety (WHS) Management System including all safety policies, procedures, the critical risk

program, and any reasonable instruction given by WaterNSW

- ensuring we keep safety knowledge and training up to date, for ourselves and those for whom we are responsible
- managing all incidents and injuries with compassion, transparency and efficiency
- complying with the WHS Act and other relevant WHS legislation

**In addition, directors, employees and contractors must also ensure that they are familiar with and comply with WaterNSW security and emergency procedures.**

These cover access to WaterNSW premises, safety evacuation rules and first aid equipment rules and procedures.

Value Our People is one of our values. This principle reflects our unwavering commitment to maintaining a safe working environment, upholding respect and dignity for all individuals, and supporting continuous growth and development in our workforce.

A cornerstone of this commitment is our focus on inclusion and diversity. We recognise that a workplace enriched by diverse perspectives and inclusive practices contributes significantly to employee wellbeing and engagement. Moreover, it fosters a culture of creativity and innovation and enhances our ability to build meaningful relationships with our customers and the communities in which we operate.

Our Inclusion & Diversity Program:

- promotes awareness, understanding and appreciation of inclusion and diversity
- creates a culture of belonging where our people feel valued and respected
- encourages diverse representation of our workforce to reflect the communities in which we operate.

We believe our overall risk of modern slavery within our workforce is low due to the nature of what we do, and the compliance checks we have in place. As of 30 June 2025, 95% of our workforce are direct employees and only 5% is engaged through agency or contingent labour hire arrangements. . We use Contractor Central, a framework used across NSW Government that helps agencies engage and manage their extended external workforce, including contingent workers and professional services contractors/consultants. It is a requirement under our enterprise agreement that anyone engaged via a labour hire arrangement such as Contractor Central be paid no less than the amount that would otherwise be paid to a WaterNSW employee performing similar work.

**As part of our recruitment and onboarding process, we conduct thorough integrity checks for all workers, including temporary employees who join our business.**

These include, but are not limited to:

- Right to Work (that is, they are legally able to work in Australia)
- pre-employment medical assessment
- criminal background checks
- professional qualifications and education.

Passing these checks is a pre-requisite for employment. For our contingent labour, our service provider completes integrity checks on our behalf, except for criminal background checks which are undertaken by WaterNSW.

Any concerns are flagged, and a risk assessment is conducted to further ensure suitability of hire and to minimise business risk.

## Our supply chains

We remain committed to working collaboratively with our suppliers to understand and support the development of their approach to identifying and addressing the risk of modern slavery within their operations and across their supply chain. Our direct supplier contracts are predominantly held with Australian companies. All suppliers, irrespective of industry, size and location, are expected to meet our standards set out in the Supplier Code of Conduct. Our supply chains cover a wide range of products and services procured from third-party suppliers and we have systems in place to identify and assess potential risk areas during the procurement planning stage (MS risk assessment questions and procurement plan considerations).

Our standard procurement processes include a variety of checks and reviews to help ensure that the suppliers we engage with have the capability and capacity to comply with our policies and commercial terms. We also check that our contracts undergo appropriate legal assessment and have appropriate modern slavery contract clauses in place. We regularly look to improve our supply chain processes.

To ensure consistency, we operate a well-established risk management framework, underpinned by standardised tools, practices, a risk appetite assessment and risk management methodologies. Through this comprehensive framework, we review our organisational level modern slavery risks quarterly, including the level of risk which modern slavery may present to us. We review in detail the risk, causes, consequences and most importantly, controls we can apply to mitigate the risk from occurring. The outcome of this review is recorded and considers the reputational and financial risk impact to WaterNSW in the event of an incident occurring.

We believe that the key risk indicators, being Modern Slavery training; non-compliant suppliers and suppliers with suspected Modern Slavery instances used to monitor the effectiveness of the controls applied are satisfactory and the risk to business is low.

**On completion of each quarterly update, the risk register is reviewed and updated, and results reported to the Executive team and the Board Audit and Risk.**

This regular, ongoing assurance is another step we take to thoroughly review and minimise the likelihood of a modern slavery occurrence.



## Risk mapping our supply chain

We continue to risk map our supply chain through several processes. All suppliers are assigned a category based on the materials or services which we predominantly procure from them. Each category is managed by a Category Manager, including the supplier approval and onboarding process. Suppliers are mapped to understand their base location and the location from which the products and services are sourced. The majority of our suppliers are based within Australia.

## Our spend profile 2024 – 25 financial year

We are reliant on over 800 plus suppliers to help us deliver our business operations and spent \$210.5 million<sup>1</sup> through our supply chain during the FY25 reporting period.

Due to its complexity and breadth, our supply chain is the element within our organisation that poses the highest risk of modern slavery. In April 2025, we re-mapped our categories using the Modern Slavery Inherent Risk Identification tool provided by NSW Procurement. This report provides further vision into our supply chain by flagging spend in high-risk categories in subsequent contracts and suppliers. Using this updated risk identification tool, we can ascertain our highest risk areas are:

- construction and asset maintenance
- property, facilities management, security and cleaning
- ICT computer hardware and maintenance
- contractor and temporary labour.

<sup>1</sup> WaterNSW Category Spend Report

The below table highlights key identified risk categories only using the NSW Procurement Modern Slavery Inherent Risk Identification tool in context to total spend across all categories.

Highlighted categories of higher risk spend	Total value \$m	% of spend	Modern slavery risk
Construction works	\$42.4	20%	Construction labour, raw materials e.g. steel, concrete
Infrastructure asset repairs and maintenance	\$22.5	11%	Asset maintenance raw materials
Computer hardware - purchases and maintenance	\$4.8	2%	Laptops, computers
Property security	\$2.3	1%	Labour hire
Property cleaning and waste management	\$1.8	1%	Cleaning and security services labour hire
Contractor and temporary labour	\$14.3	7%	Contingent labour hire
<b>Total spend - higher risk categories</b>	<b>\$88.1</b>	<b>42%</b>	
<b>Total spend - across all WaterNSW spend categories</b>	<b>\$210.5</b>		

**Construction and asset maintenance:** This represents our largest risk area - amounting to a total annual spend of \$64.9 million or 31% of our entire spend.

In the coming year, we will be introducing additional steps that focus on two specific higher risk categories, including:

- The introduction of specific tender questions for higher risk procurements, catered to these specific categories and focussed on imported raw materials, non-specialised and non-trade labour.
- The incorporation of specialised Key Performance Indicators (KPI's) in subsequent contracts if the related risks are identified.
- The inclusion of additional checks targeting these categories in our new standardised assurance spot audits of related contracts, ensuring adherence to modern slavery related clauses.

**Property, facilities management, security and cleaning:** The major higher risk categories here are security and cleaning and waste management, which amounted to an annual spend of \$4.1 million over the last year.

We have finalised our security tender, leveraging suppliers listed on the NSW Government Integrated Security Contract that ensures compliance with the NSW Government's Procurement Policy Framework, Modern Slavery objectives and Fair Work Act 2009. Our contracted supplier is now engaged under a WaterNSW contract containing strengthened modern slavery related terms and conditions, with the awarded supplier accepting our Supplier Code of Conduct outlining our Modern slavery expectations.

We continue to use the NSW Government cleaning contract which ensures that applicable employment guarantees to cleaners are in place, ensuring their welfare.

**ICT computer hardware and maintenance:** The spend for hardware and maintenance amounted to \$4.8 million over the last year. We will continue to consider modern slavery risks when conducting tenders across these categories as well as reviewing contract assurance when conducting internal spot audits of related contracts.

**Contractor & temporary labour:** WaterNSW use the Contractor Central model which provides greater visibility of our contingent labour hire supply chain. Quarterly business reviews take place with our managed service provider, Kelly OCG, to better assess and address our modern slavery risks collaboratively. Integrity checks continue to be carried out prior to the engagement of a contingent labour hire.

## Reporting concerns

Our Supplier Code of Conduct and the WaterNSW website each contains guidance on how to report any concerns that our suppliers, sub-contractors or their staff may have about modern slavery. There are various methods that our suppliers can use to raise concerns, including:

- emailing our procurement mailbox, which is monitored by our procurement governance team [procurement@waternsw.com.au](mailto:procurement@waternsw.com.au)
- contacting our Customer Service Centre on 1300 662 077
- contacting an appropriate manager or a member of the Procurement team
- using the "Your Call" website [yourcall.com.au/report](http://yourcall.com.au/report)
- using the "Your Call" hotline 1800 751 298

"Your Call" is operated by Your Call Whistleblowing Solutions, an independent external organisation which provides details of each report to our General Counsel, ensuring that each report is reviewed at appropriate levels within WaterNSW. Each case is then investigated by suitably experienced individuals with support from our Legal, Risk, HR or Procurement teams.

Reporters have the option to remain anonymous and can provide information and evidence about their concerns via Your Call's website if they are concerned about revealing their identity to the investigation team.

# What we have done to address our modern slavery risks within our operations and supply chain during 2024-25

## Raising awareness

We have always valued the importance of educating employees to identify any instance of modern slavery, and we escalate concerns through the appropriate channels.

Our online Code of Conduct training continues to be provided to employees and is received positively. More in-depth modern slavery awareness is available for employees through our modern slavery e-Learning module.

It is currently assigned as mandatory training to a number of key positions across the organisation and is recommended for Project Managers and all other employees who would like to know more.

A refresher session was delivered to the Executive Leadership Team in August 2024 on Modern Slavery and their obligations as leaders. This generated a lot of discussion and commitment to developing a Modern Slavery policy, amongst other outcomes. The Procurement Team also underwent

Modern Slavery refresher training and participated in a discussion around their roles in mitigating the risk of modern slavery through our tendering and risk management processes.

Our Procurement, Corporate Property & Services Manager completes the CIPS Ethical Procurement Module annually as part of her professional accreditation, which includes a focus on human rights, exploitation and forced labour.

The WaterNSW Modern Slavery Working Group prepared information on modern slavery to be published on our intranet site 'The Source', to help raise awareness across the organisation and complement our Code of Conduct and modern slavery eLearning modules.

Contact details for our Working Group members are published on our website so they can receive feedback and comments, or answer any questions employees may have on modern slavery.

### Evaluating our performance

We have established Key Performance Indicators (KPIs) to help us to monitor and report on the effectiveness of our actions. Below are the key KPIs for 2024-25.

KPI	Target	Progress
<b>Speaking up without fear of retribution</b> % favourable responses from employees for empowerment/ autonomy	90%	76% of staff who completed the staff survey responded positively to questions around empowerment / autonomy. Along with our embedded values, we believe this is evidence of a culture where people feel comfortable to challenge and raise concerns, however, there is more work to do to achieve our target.
<b>Modern slavery awareness</b> Company wide targeted training	95%	81% of eligible staff have completed the Code of Conduct Modern Slavery training against the target of 95% for the year 2024-25.
Non-compliant suppliers	0%	We have no reported instances of modern slavery with any of our suppliers
Suppliers with suspected instances of modern slavery	0%	There were no suppliers with suspected instances of MS reported
<b>Supplier due diligence and adherence</b> Supplier Code of Conduct	100%	100% of our contracted suppliers have accepted and signed up to our Supplier Code of Conduct during tender response. This is a testament to our enduring relationships with our suppliers, who are committed to reducing risks we face as a business, for the benefit of our wider stakeholders.

## Supply chain risk management

We acknowledge that the risks of modern slavery may increase in some of our supply chains, due to geographical location of some suppliers, our areas of operation and the source of materials used in products supplied to us. For example, around 60% of the \$6 billion spent annually on construction materials in Australia are imported from China, according to the Australian Construction Industry

Forum. We acknowledge the lack of visibility in overseas markets, and this carries additional risks of modern slavery especially in secondary levels of our supply chain and source materials used on our construction projects or in the provision of goods and services.

Our Modern Slavery Risk Assessment focusses on four risk indicators and risk factors including:

Modern slavery risk indicators	Sector and industry risks	Product and services risks	Geographic risks	Supply chain model risks
<b>Risk factors</b>	<ul style="list-style-type: none"> <li>Informal unregulated sectors of industries</li> <li>Little visibility over lower tier suppliers</li> <li>Seasonal work</li> <li>Low pay dangerous work</li> </ul>	<ul style="list-style-type: none"> <li>Product or service often involving lower wages and manual labour</li> </ul>	<ul style="list-style-type: none"> <li>Location with poor governance</li> <li>Weak rule of law</li> <li>Conflict</li> <li>Corruption</li> <li>Displacement</li> <li>State failure to protect human rights</li> <li>Socio economic factors such as poverty or widespread discrimination</li> </ul>	<ul style="list-style-type: none"> <li>Larger and more complex supply chains</li> <li>Sub-contracting and use of labour recruiters</li> <li>Recruitment fees may be charged</li> </ul>
<b>Examples</b>	Extractives, textiles and fashion, fishing, electronics, cleaning and agriculture	Products: bricks, cotton, rubber Services: cleaning	Freedom House scores over 200 countries considering access to political rights and civil liberties	Exorbitant recruitment fees that keep workers locked in debt bondage

## Areas of focus for the next reporting period

We are on a journey of continuous improvement and have identified several areas of focus for the year ahead, in addition to our business as usual measures:

- through our Modern Slavery Working Group, continue to develop a plan to address the gaps identified when we compare WaterNSW against the Guidance on Reasonable Steps.
- continue the implementation of our communication plan and activities to help raise awareness of modern slavery.
- tailor our tender evaluation questions and templates in accordance with the modern slavery risk categorisation to seek robust assurance from our suppliers regarding their own commitment and actions to mitigate modern slavery risks.
- provide refresher modern slavery awareness training for contract managers during the implementation of our contract management assurance program.
- seek ongoing guidance and best practice to enhance our proactive employee and supplier checks where required.



# Conclusion

WaterNSW remains steadfast in our commitment to preventing modern slavery and upholding human rights across our operations and supply chains. Throughout the 2024–25 reporting period, we have strengthened our governance, policy frameworks, supplier engagement, and staff awareness to ensure our practices align with the values of ethical conduct, transparency, and accountability.

We are encouraged that no instances of modern slavery have been identified during the year, however, we acknowledge that the risk is ongoing and dynamic, particularly in certain high-risk procurement categories. We remain vigilant and committed to improving our systems, controls, and risk assessments to safeguard against any potential instances of modern slavery.

Looking ahead, our focus remains on continuous improvement, strengthening our due diligence processes, enhancing procurement assurance measures, expanding targeted training, and driving stronger collaboration with industry partners. Through our actions, we aim to demonstrate leadership, support fair and ethical supply chains, and contribute meaningfully to the effort to eliminate modern slavery in all its forms.



# For more information

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