

North East Water

Modern Slavery Statement 2024-25

ACKNOWLEDGEMENT OF COUNTRY

In the spirit of reconciliation, North East Water acknowledges the Traditional Owners of Country throughout north-east Victoria and their connections to land, water, sky and community. We pay our respects to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander people today.

We acknowledge the continued cultural, social and spiritual connections that First Nations people have with the lands and waters and recognise and value that these groups have cared for and protected them for thousands of generations.

We recognise and value the continuing rich cultures and contributions of First Nations peoples and communities to the Victorian community.

We are proud to work with the seven Aboriginal communities in our service region, including the two Registered Aboriginal Parties of Yorta Yorta and Taungurung. We are also committed to our relationships with the Duduroa Dhargal, Dhudhuroa Waywurru, Dalka Warra Mittung, Bangerang and Jaithmathang communities.

We remain committed to working in partnership with local First Nations people to ensure their ongoing contribution to the future of the water management landscape while maintaining their cultural and spiritual connections.

1. INTRODUCTION

This Modern Slavery Statement is provided as a statement under s14(1) of the Modern Slavery Act 2018 for the period of 1 July 2024 to 30 June 2025 for North East Water (ABN 97 364 605 415).

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

STRUCTURE

North East Water is responsible for the provision of water and wastewater services to an estimated population of 121,000 people in 39 towns in North East Victoria, across an area of 20,000 square kilometres. The service delivery area is bound by Corryong, Yarrowonga, Benalla and Dartmouth. While our customer base primarily consists of residential users, we also service major industries in larger towns and cities such as Wodonga, Wangaratta, Wahgunyah, Benalla and Myrtleford. Additionally, we serve commercial and rural customers, reflecting our commitment to meeting the varied needs of our region.

To provide these essential services, we operate 21 water treatment plants (WTPs) and 22 wastewater treatment plants (WWTPs) across the region. We supply reclaimed water to 17 schemes, servicing 29 third-party sites, including community benefit applications, and our own North East Water operated farms.

North East Water was established on 1 July 1997 through a Government Order following the application under section 100(2) of the *Water Act 1989* by the Ovens Region Water Authority and the Kiewa Murray Water Authority. The Authority became a corporation on 1 July 2007, the reporting entity under the Modern Slavery Act is North East Region Water Corporation (North East Water). North East Water does not have control or ownership of any other reporting entity. As a public utility, we are accountable to the Victorian Government Minister for Water and regulated by the Essential Services Commission, the Department of Energy, Environment and Climate Change Action, Department of Health and the Environment Protection Authority Victoria.

OPERATIONS

North East Water operates under a board made up of 10 directors (nine non-executive directors and one executive director). The board's role is to preside over significant strategic, commercial, regulatory, financial and risk focused business decisions. The structure includes an executive management team of five and a senior leadership team. In 2024-25 financial year there were 208 FTE equivalent North East Water employees, working at our regional head office in Wodonga (Vic) and at various other depots located across our service footprint. Senior leadership and executive team members are employed under senior or executive management agreements. An Enterprise Agreement is in place for all other employees, this requires approval by the Fair Work Commission North East Water and is negotiated with respective unions and staff member representatives.

North East Water operates under a comprehensive people management structure that includes safe workplace practices such as risk assessments and fatigue management procedures and the Belonging Plan to provide an inclusive and safe workplace. Oversight is provided at a board level by the People and Culture Committee. North East Water considers our internal operations to be at a very low risk of modern slavery.

SUPPLY CHAIN

North East Water procures goods, works and services to maintain and invest in water and wastewater assets to provide drinking water and sewerage services to our customers. Our assets include pipelines, pump stations, treatment plants and water reuse infrastructure. We deliver an extensive capital works and asset renewals program that requires procurement of design, construction and engineering services. The business also procures various digital and technology solutions, professional services, goods, and plant and facility maintenance services to support the operation of the business. Our supply chain is made up of 896 suppliers.

3. RISK OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

SUPPLY CHAIN

North East Water has joined with the Water Services Association of Australia (WSAA) Modern Slavery consortia to engage with and assess our supply chain in partnership with Informed 365, a reporting platform providing industry risk profiles and individual supplier assessments based on supplier surveying.

In considering our tier one supply chain, being those suppliers engaged directly by the business, the following categories of spend and the associated risk based on the industry classification, have been identified. The classification is supported by the data driven assessments provided by the Informed 365 platform.

Procurement Category	Risk Profile	Inherent Risk
Facility maintenance services	Labour hire practices in industry with low transparency and risk of exploitation of vulnerable communities	High
Construction & Engineering	Labour hire practices in industry with low transparency and risk of exploitation of vulnerable communities. Higher risk in finishing trades	High
Agricultural services	Labour hire practices in industry with low transparency and risk of exploitation of vulnerable communities	High
Equipment & materials	Digital equipment and chemical production with risks in industries located in countries with low transparency in the upstream supply chain	High- Very High
IT consulting services	Offshoring of services based in countries with higher risk of modern slavery practices	High
Software Systems	Offshoring of services based in countries with higher risk of modern slavery practices	Medium
Professional & Commercial Services	Offshoring of services based in countries with higher risk of modern slavery practices	Low

While the above table demonstrates that North East Water’s supply chain does include industries with high to very high risk ratings this profile does change when consideration is given to the location of the business we directly engage, from an analysis of the surveyed supplier responses. The risk profiles of the suppliers invited to complete a Modern Slavery Questionnaire show a low to medium risk of the modern slavery practices, with 23.81% being assessed as Low and the remaining 76.19% at a medium risk. It is acknowledged that this is a very high level assessment and does not incorporate an assessment into other tiers in our up or downstream supply chain.

OPERATIONS

A large part of our operations is undertaken by North East Water employees, all of which are based in Australia and are employed under contracts meeting the requirements of Australian labour laws. Consequently we consider the risk of modern slavery practices within our inhouse operations to be very low.

4. ACTIONS TAKEN TO ADDRESS THESE RISK

In preparation of North East Water's first modern slavery statement we have attended industry events to grow our knowledge of modern slavery risks to better understand how we can mature our practices. In joining the WSAA Modern Slavery consortium we are engaging with and assessing our supply chain. This collaboration, with other WSAA members and Informed 365, provides a consistent reporting platform for water industry suppliers, reducing duplication of effort as one questionnaire can be shared with all participating water corporations. As part of this group, North East Water has quarterly updates from leading experts on modern slavery, ensuring that we continue to build our understanding of best practice in this space.

North East Water invited suppliers to complete a Modern Slavery Questionnaire developed in collaboration with other water corporations, via the Informed 365 portal. The questionnaire asked suppliers to define their modern slavery risk and detail any actions taken to address these risks. The questionnaire is also an education tool for suppliers as it provides information to assist them to understand and address risk. As we are at the start of our journey to embed processes for identifying and addressing modern slavery practices within our supply chain, North East Water targeted 21 suppliers, based on highest expenditure in 2024-25, within the two main categories of construction and construction related services and secondly goods and services. We had a 38.10% response rate, slightly higher than the sector average, with 8 of the 21 submitting a completed questionnaire. This data will inform our assessments and actions into the future and establishes a base from which we can monitor continuous improvements in processes and practices.

Along with the distribution of the Modern Slavery Questionnaire, our procurement practices are compliant with the Victorian Government Purchasing Board's policies and the Victorian Government's Ministerial Directions and Instructions for Public Construction Procurement. This ensures that contracts are delivered in compliance with policies listed below, strengthening obligations on labour hire and subcontracting arrangements:

- Fair Jobs Code
- Local Industry Development Plans (Local Jobs First Policy)
- Victorian Government Supplier Code of Conduct

5. ASSESSESING THE AFFECTIVENESS OF ACTIONS

We recognise that our processes for reviewing and assessing actions taken to address our modern slavery risks are in development and that we have focused this year on developing an understanding of our supply chain risks through the use of the Informed 365 platform. As we are in the initial stages of developing a more comprehensive understanding of modern slavery risks and affective actions to address these risks, we are not in a position to assess the effectiveness of the actions we have taken since becoming a reporting entity, as of June 2025. However, we are committed to continually improving and evolving our processes and furthering the businesses understanding of the impact of modern slavery and our responsibilities in identifying and mitigating risks. We have determined future actions that will enable us to bring effective change within our supply chain where possible.

6. OTHER ENTITIES- AFFECTIVENESS OF ACTIONS

North East Water does not own or control any other entities.

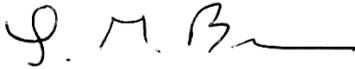
7. INFORMATION FOR CONSIDERATION- THE YEAR AHEAD

North East Water is committed to taking a continuous improvement approach to identifying and managing modern slavery risks within our operations and supply chains. We will aim to increase the transparency in our supply chain and work collaboratively with industry members, supplier and stakeholders. To do this will be focus on the following actions:

- Implement the inclusion of modern slavery clauses into our contracts
- Imbed due diligence processes such as supplier checks against the Global Slavery Index
- Organisational training

APPROVAL

This statement was approved by the Board of North East Water on 9 December 2025 and is signed by Stephen Brown (Board Chair), who is authorised to sign this statement on behalf of North East Water.

A handwritten signature in black ink, appearing to read 'S. M. B.' followed by a horizontal line.

Stephen Brown

Chair - North East Water