



Unitywater

Serving you today, investing in tomorrow.

Modern Slavery Statement

1 JULY 2020 – 30 JUNE 2021

Foreword from the Chairman



I am pleased to share Unitywater's annual statement on modern slavery, which complies with the *Australian Modern Slavery Act 2018*.

Unitywater joins businesses across the nation as they work to ensure everyone's human rights are protected.

We know that preventing and addressing our own involvement in modern slavery is the first step in the fight against it.

We address this in our statement and outline our commitment to running a safe and responsible business that cares for our people, customers and community.

We set clear expectations for our employees and suppliers, including contractors and agents. This helps raise their awareness of any possible involvement they have in modern slavery and what they can do to prevent and address it.

With a diverse supply chain, we expect our suppliers to operate ethically and in accordance with all applicable modern slavery laws. To ensure compliance, we outline these expectations in our Procurement Guide and through our ongoing engagement with our suppliers.

However, we know that adopting high standards is not enough. Knowledge sharing, such as targeted training programs for our people and immediate action, including mitigation measures where we see a risk of involvement, are vital to ensure we maintain our commitment.

A handwritten signature in black ink, appearing to be 'Michael Arnett', written over a horizontal line.

Michael Arnett
Chairman

This Modern Slavery Statement was approved by the Board of Unitywater on 23/11/2021.

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1. Unitywater overview

1.1 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 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 651 834 883).

1.2. 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.

We operate and maintain more than \$3.7 billion worth of essential assets, for customers across 5,223 square kilometres. 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; and
- provide returns to our participating councils.

1.3. Supply chains

With the population of the Sunshine Coast, Moreton Bay and Noosa regions projected to grow from approximately 800,000 in 2016 to 1.2 million in 2036, we are planning to meet the future needs of the region in an economically and environmentally sustainable way.

Our investment 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 1545 suppliers in 2020-21 who helped to ensure goods and services were provided for approximately:

- 6040km sewerage mains
- 798 sewage pump stations
- 17 sewage treatment plants
- 343,532 water connections
- 6230km water mains
- 70 water pump stations
- 103 water reservoirs
- 12 schemes supplying recycled water
- 690 full-time equivalent employees

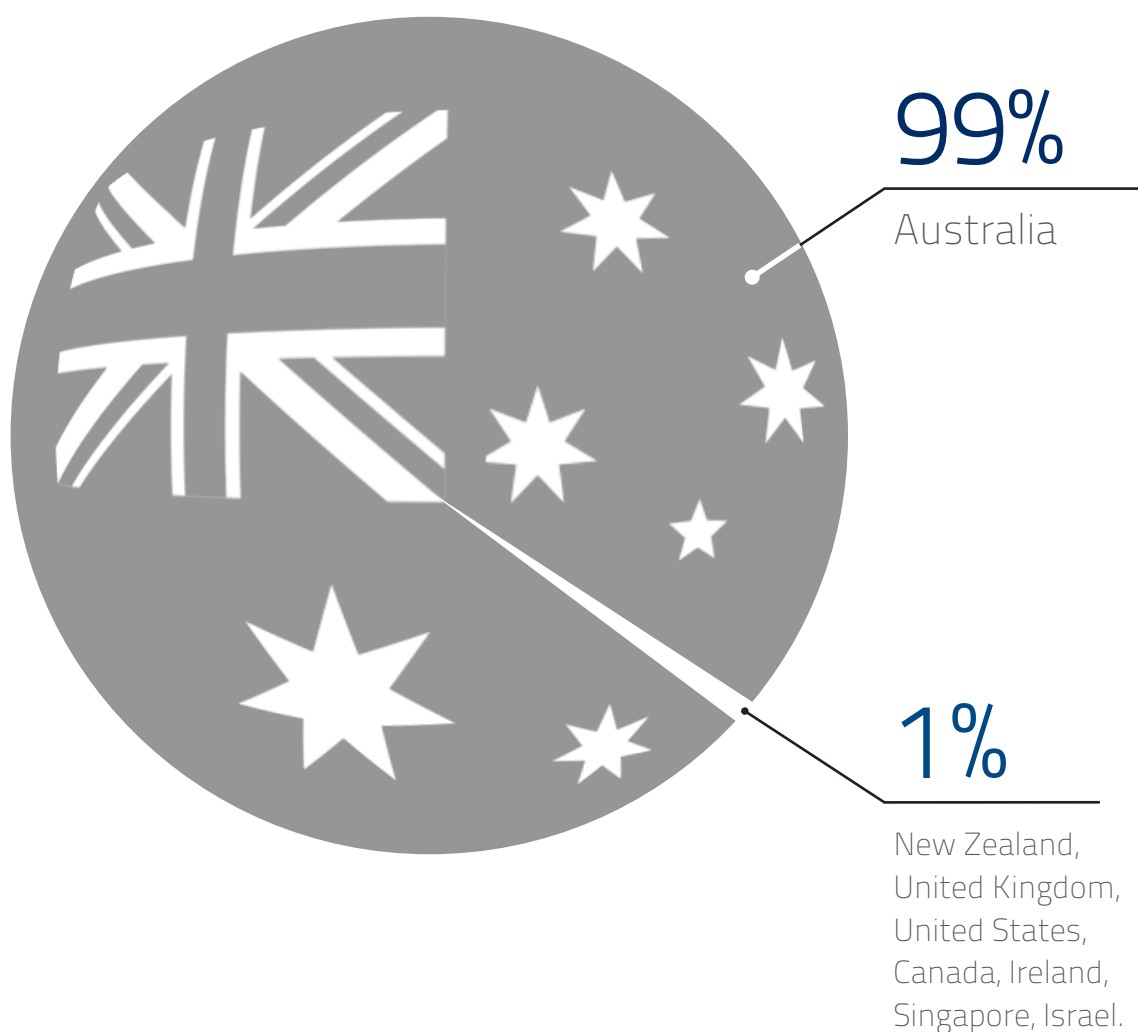
Over the course of the 2020/21 financial year Unitywater spent \$559M on goods and services to provide water and sewerage services to the Moreton Bay, Sunshine Coast and Noosa regions.

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

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

99% of our suppliers are located in Australia with the remaining 1% of suppliers based in Canada, New Zealand, Ireland, Israel, Singapore, United Kingdom and the United States of America.

*Figure 1 – Spend by supplier country**



*Some suppliers are Australian subsidiaries of overseas suppliers.

2. Risks of modern slavery

2.1. Supply chain risks

Based on a review of our suppliers in February 2020, the highest risk of modern slavery is in the following industries:

- › Water and sewerage services
- › Non-residential building construction and non-building construction
- › Facilities management services
- › Computer and technical services and electronic equipment
- › Industrial machinery repairs
- › Employment placement
- › Sanitary and garbage disposal

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.

Table 1 – Modern slavery risks

Risk Event	Controls
Unitywater's contractor engages in modern slavery	<ol style="list-style-type: none"> 1. Apply stringent due diligence to contractor selection process 2. Clearly articulate reporting and anti-modern slavery obligations in contracts 3. Develop an understanding of potential for exposure to modern slavery in supply chains 4. Develop a procedure for Unitywater to address modern slavery in its supply chain 5. Develop and apply a training system for specific Unitywater roles to help them identify and mitigate modern slavery risks 6. Regularly audit contractors on their contract performance and compliance with modern slavery obligations
Recruitment practices breach modern slavery requirements	<ol style="list-style-type: none"> 1. Review Unitywater employment contracts against human rights and modern slavery acts 2. Continue to ensure recruitment procedures include validation of applicants' right to work and age 3. Continue to ensure roles are assessed against award standards to ensure at least minimum remuneration is paid, if not better.
Obligations towards employees are not adequately protected or addressed	<ol style="list-style-type: none"> 1. Review employment contracts against human rights and modern slavery acts 2. Audit fatigue management systems, processes, procedures 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.

3. Actions taken to address risks

3.1. Supply chain 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 developed an Ethical Supplier Questionnaire. In the FY20/21 reporting period, we invited suppliers from our high-risk supply industries to complete the questionnaire, seeking further information about their business structure, operations and ethical practices. An attestation was also issued to the same suppliers classified in the high-risk supply industries requesting they attest to their modern slavery compliance.

Our tender templates, Procurement Guide and contracts have been updated to reflect our commitment to procuring from ethical suppliers. It provides staff 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. 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 work closely with high risk category suppliers on better understanding and monitoring their supply chain risks. We are also investigating a risk-based survey platform which can be used to classify suppliers based on country of operation and industry risk.

We will continue to focus on preparing and issuing 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.

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 the organisation 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; and
- 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 personnel 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, the system will then generate contracts that comply with relevant Unitywater 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, turn down an offer or otherwise opt out of the process at any time.

Each position, whether advertised internally or externally, has been assessed to ensure there is no misleading information and to establish 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 position title, salary information, work location, conditions and entitlements.

We have comprehensive policies, procedures and systems in place to ensure that employees are paid on time and in the correct amount according to their entitlement and that leave entitlements are granted consistently with the requirements of the Fair Work Act 2009 (Cth).

We regularly 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 award. In the event of any shortfall, this is corrected each year.

Our payroll system is configured to automatically calculate leave accruals in accordance with required entitlements. Reporting on accruals occurs fortnightly, with reconciliations conducted throughout the year to validate that any leave adjustments, related to leave reversals or changes to conditions of employment, have been applied correctly.

A modern slavery training program was issued to all leaders, including team members from procurement, health and safety, people operations and recruitment. The training addressed acceptable working conditions and the risks pertaining to modern slavery. Refresher training for applicable staff will be provided every two years.

The modern slavery training module will form part of the induction process for new staff 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.

5. Consultation with subsidiaries

None of Unitywater's subsidiaries had any operations or supply chains during the statement period.



Unitywater

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 -  Customer Service Counters 8.30am - 4.30pm,
Mon - Fri (except public holidays)
6 -10 Maud Street, Maroochydore QLD 4558
33 King Street, Caboolture QLD 4510

Unitywater has certification to
OH&S ISO 45001: 2018 Reg No 500000079
Environmental ISO 14001: 2015 Reg No 500000079
Quality ISO 9001: 2015 Reg No 500000079
Food Safety ISO 22000: 2018 Reg No 500000079

