

**Greater
Western**
Water

Modern Slavery Statement

December 2024



Acknowledgement of Country

“Greater Western Water respectfully acknowledges the Traditional Owners of the lands and waters upon which we work and operate, the Wurundjeri Woi-wurrung, Wadawurrung, Taungurung, Djaara, and Bunurong peoples. We pay our deepest respects to their Elders past and present who continue to forge the way ahead for their emerging leaders.

We acknowledge the continued cultural, social, and spiritual connections that First Nations people have with the lands and waters. We also recognise and deeply value the care and protection Traditional Owners have brought to Country for thousands of generations.

Our vision is that the way we deliver water services will heal and care for Country, and we are committed to walk alongside and learn from Traditional Owners on this journey”.

Statement annexure

Mandatory Criteria

This modern slavery statement (**Statement**) addresses the mandatory reporting criteria of the *Modern Slavery Act 2018 (Cth)* in the following sections:

Modern Slavery Act 2018 (Cth) requirements	Page
Identify the reporting entity.	6
Describe the reporting entity's structure, operations and supply chains.	8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	12
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes.	15
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	21
Describe the process of consultation with any entities that the reporting entity owns or controls.	22
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	23

Principal governing body approval

This Modern Slavery Statement was approved by the Board of Directors of Greater Western Water at the 10 December 2024 board meeting.

Board Approval

Signed By:



David Middleton (Chair)

Date: 16 December 2024

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About this Statement

This is Greater Western Water's (GWW) third Modern Slavery Statement made pursuant to Section 14 of the Modern Slavery Act 2018 (Cth). The reporting period covered by this statement is 1 July 2023 to 30 June 2024.

As Greater Western Water, we are committed to continued excellence in delivering on our core purpose:

'Trusted water services
for our communities
and future generations'.

Our strategy outlines what is important to us and to our customers, communities and region. We will be guided by our vision for the decade: '**Thriving people and Country**'.

To achieve this ambitious vision, we need a strong organisation, built on our **people, partnerships** and continuous **progress**.

The purpose of this Statement is to outline our approach to ensuring that GWW has comprehensive frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chains.

This Statement sets the baseline to enable GWW move to a position of understanding its supply chain to get its suppliers modern slavery compliant and where appropriate, identify and implement risk management strategies.

GWW acknowledges that slavery can occur in many forms, as detailed in the Act, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

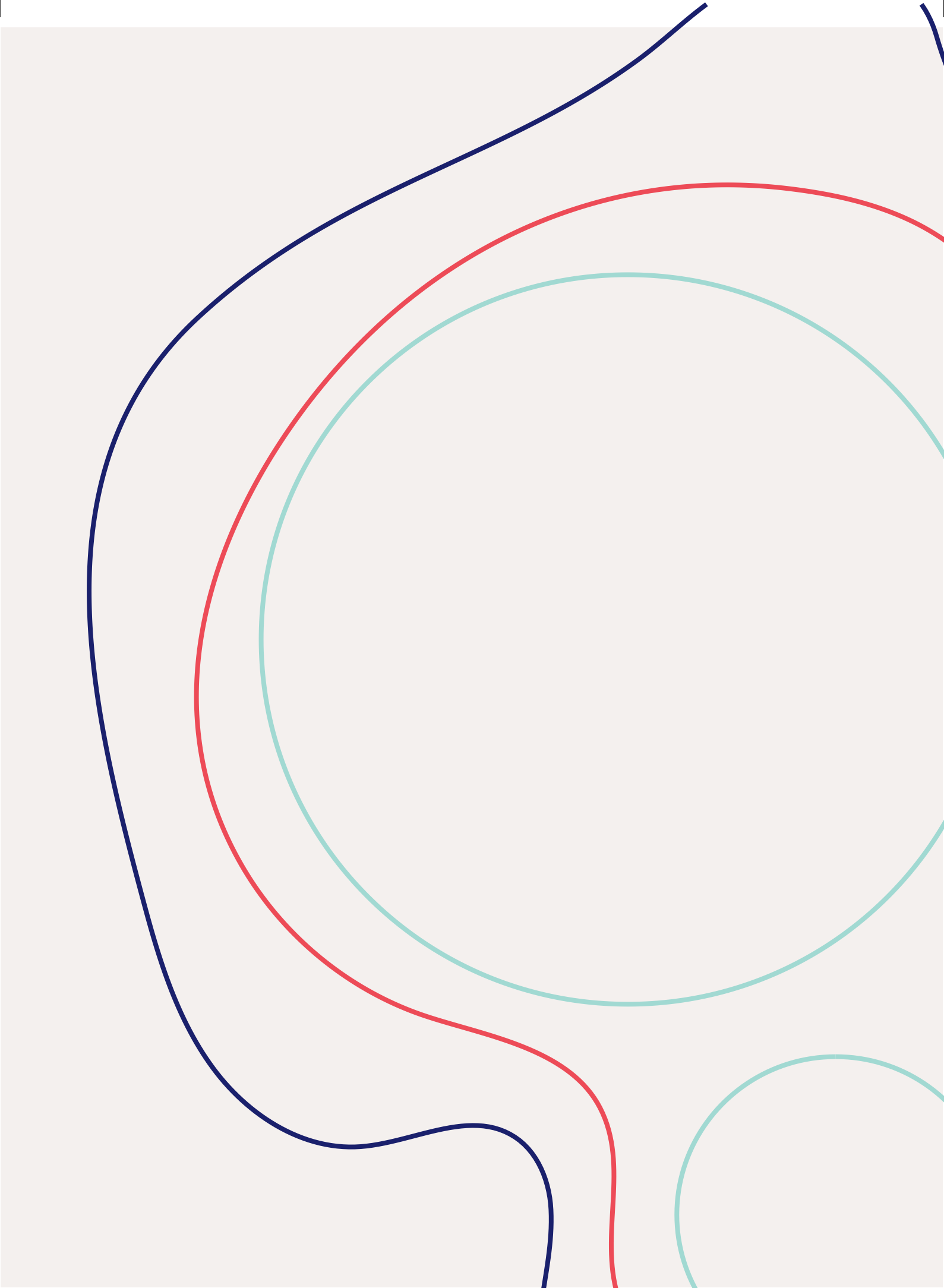
GWW is committed to operating responsibly and establishing and adhering to the highest ethical standards with a goal of identifying and working with supply chains to eradicate the various forms of modern slavery.

The policies, processes and actions described in the 2024 Statement apply across GWW's corporate structure.

Reporting Entity

This statement is made by GWW as a reporting entity with the below details:

Greater Western Water
36 Macedon St, Sunbury VIC 3429
ABN 70 066 902 467



Our Structure, Operations and Supply Chain

Our Structure

Greater Western Water is established under the Water Act 1989 (Vic).

GWW operates under Statements of Obligations issued by the Minister for Water under s. 41 of the Water Industry Act 1994. The statements impose obligations on us regarding the performance of our functions and exercise of powers. We are required to monitor compliance with the obligations set out in the statements, report on non-compliance and take remedial action as required.

The Essential Services Commission (ESC) is our economic regulator. It approves the prices we charge customers and the standards of service we deliver. We are required to submit a price submission to the ESC, typically every five years.

The Department of Health regulates drinking water quality under the Safe Drinking Water Act 2003. The Environment Protection Authority Victoria (EPA) regulates recycled water quality and the operation of sewage treatment plants under the Environment Protection Act 2017.

GWW provides drinking water, recycled water, sewerage, and trade waste services to more than **583,000** residential customers and **48,400** business customers.

Our service area covers **3,700** square kilometres, stretching from Melbourne's central business district and inner suburbs to Little River in the south, Myrmiong in the west and Lancefield in the north.

Our service area covers the local government areas (LGAs) of Brimbank, Hobsons Bay, Maribyrnong, Melton, Moonee Valley, Wyndham and Yarra, and partially covers the LGAs of Hume, Macedon Ranges, Melbourne, and Moorabool.

We operate in Bunurong, Wurundjeri Woi Wurrung, Wadawurrung, Djaara and Taungurung Country.

The Maribyrnong and Werribee Rivers are the major waterways in our region and the source of some of the water we supply to customers.

GWW manages a **\$3.7** billion infrastructure asset base including **20** large dams, **10** recycled water plants, and **7** water filtration plants in conjunction with **7,500+** km of water mains and **6,400+** km of sewer mains.

In 2023–24, GWW supplied approximately **123** billion litres of drinking water and **7.8** billion litres of recycled water and storm water.

Our Operations

GWW's role is to ensure customers have clean, safe drinking water and efficient recycled water and sewerage services.

GWW's infrastructure ensures that we have the capability to provide high quality drinking and recycled water to customers and have the

systems in place to collect and treat wastewater and sewerage. GWW is committed to:

- Delivering Value for Customers
- Supporting Communities to Thrive
- Healing and Caring for Country

GWW is focused on ensuring that its approach to Modern Slavery is firmly aligned with the above critical business commitments.

GWW Service Area



Our Structure, Operations and Supply Chain

Our operations consist of the following key business areas:



Drinking Water

GWW is committed to providing its customers with high quality and safe drinking water access. GWW places an emphasis on having a rigorous water treatment process in place for all its drinking water to ensure it is safe and to the standard that is required by its customers. Having access to multiple sources ensures we can meet demand, cater for a growing population, and manage water supplies when inflows are low.



Recycled Water

GWW provides recycled water which is wastewater that has been collected and appropriately treated such that it can be reused for non-drinking purposes. GWW produces recycled water to Class A, Class B and Class C standards where treatment period can range from eight hours to 100 days. This provides customers with water that is used for flushing toilets, watering gardens, washing clothes etc.



Sewerage

GWW's sewerage system functions to transfer sewage from customers properties to the wastewater and recycling plants without spilling. GWW is committed to a high environmental standard by ensuring that the sewerage system is free of spillage and blockages and any faults within the system are rectified as soon as detected. Collected wastewater is treated to produce recycled water.



Trade Waste

GWW provides its industrial and commercial business customers with trade waste collection services. Such customers include but are not limited to restaurants, butchers, hotels, swimming pools etc. Trade waste is collected into GWW's sewerage system and is generally treated before discharge to protect the health and safety of the system and its customers.



Biosolids

GWW produces biosolids that meet the quality prescribed by the Environment Protection Authority (EPA). Biosolids are a nutrient rich organic material that is produced from the wastewater recycling process. They make a viable alternative fertiliser solution if applied under the right conditions and can be used for applications such as fertilisers, soil conditioners, structural material, compost etc.

Our Supply Chains

Greater Western Water annually spends **\$367+** million on the procurement of services and products to aid its operations and capital works. GWW has broken its procurement spend into the following four key categories:



Construction (\$161m + Annual Spend)

Services that support GWW's capital works projects include:

- Direct Professional Services (Engineering design, architects etc.)
- General Contractors
- Civil Services



Operations/Maintenance (\$90m + Annual Spend)

Services that support GWW's day to day field operations include:

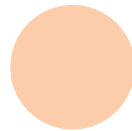
- General Maintenance
- Cleaning
- Chemical Supply
- Operational Technology
- Metering



Information Technology (\$71m + Annual Spend)

Services and products that support GWW's online and intranet infrastructure include:

- IT Consulting
- Software Licenses
- Software Maintenance & Support
- Computer Hardware



Indirects (\$43m + Annual Spend)

- Legal Services
- Consulting Services
- Recruitment
- Travel

Modern Slavery Risks

GWW acknowledges that Modern Slavery risks may be present in the operations and supply chains of companies operating in the water industry. GWW and its peers within the water industry are committed to reducing and eliminating the risks associated with Modern Slavery.

GWW acknowledges that while Modern Slavery can occur within Australia, there is a low risk of Modern Slavery occurring within GWW's direct operations. The primary driver being the nature of GWW's workforce many of whom are primarily based in an office or field operations setting which are in accordance with applicable Australian workplace law. GWW also ensures that it maintains rigorous governance framework and policy (including a whistleblower hotline) that outlines its commitments and entitlements available to its workforce to provide all GWW people with a safe and fair workplace. While risk within our direct operations may be small, we understand that risks within our supply chain are much greater. GWW is a committed member of the VicWater Water Industry Social Value in Procurement Working Group (WISVPWG) is the cross-industry forum that collaborate across the Victorian water industry to use its purchasing power to achieve social outcomes. It allows working together to share information, promote consistency in policy, processes, reporting and strategic approaches in supply chain analysis.

Fighting Modern Slavery and its risks within our industry's supply chains has been one of the forefront goals of this working group. The group has implemented a third-party supplier assessment platform, *Informed 365* which assists organisations to assess and manage Modern Slavery risks in their supply chains.

Working with technology provider Informed365 and the WSAA, this collaboration has allowed WSAA members to assess and report on their supply chain networks more easily through a single online platform which collects, compares and collates information on suppliers, to inform year-on-year progress.

Of the **1,198** suppliers engaged, **58%** have completed, or are completing, the assessment and many are shared by multiple organisations across the water services industry. This approach ensures consistency across the industry, streamlines the reporting process for businesses involved, reduces the administrative burden, and makes it easier for suppliers to share information with the organisations they choose.

Implementation of the Modern Slavery platform has enabled GWW to:

- move away from excel based tools to a single repository of modern slavery assessment questionnaire and management at a supplier and/or industry level. The platform enables GWW to keep track of supplier's inherent risks as well as progress towards reducing risk
- make available information of shared suppliers to participating water authorities (with supplier's consent)
- track parent company and supply chain visibility of our supplier's modern slavery inherent and residual risks.



Modern Slavery Hot Spots

Modern slavery poses a higher risk in areas with the below characteristics:

- Reliance on migrant or overseas workers
- Reliance on low skilled labour
- Reliance on materials from high-risk geographies/ countries
- Reliance on manufacturing within low-cost countries

The following items/activities have been identified as high risk within GWW's supply chain categories:

Construction

- Construction labour
- Offshore engineering services
- Mechanical and electrical equipment

Operations

- Maintenance of facilities (incl. cleaning)
- Grass Cutting
- Herbicide Application/ Edge treatment
- Chemical Products

Information Technology

- Offshore IT Services
- Electrical equipment

Indirect

- Temporary Staff
- Labour hire and traineeship programs
- Security
- Debt Collection
- Customer Research Services

The background is a solid teal color. It features several large, white, abstract, organic shapes that overlap and flow across the page, creating a modern, minimalist aesthetic. The shapes are primarily on the left and top, framing the central text.

Addressing and Managing our Modern Slavery Risks

Assessing and addressing our modern slavery risks using the Informed365 supplier assessment platform

During the 2024 Financial Year, GWW has been working with technology provider Informed365 and the Water Services Association of Australia (WSAA) to assess and address modern slavery risks through its supply chains.

Informed365 Supplier platform

Of the **341** suppliers engaged directly by GWW, **98%** have completed, or are completing, the assessment.

Reporting supplier progress

GWW has invited suppliers to register and enter information about actions they are taking to assess and address modern slavery; this data can then be accessed by WSAA members through the platform's dashboard to enable better evaluation, decision-making and reporting. The platform is free for suppliers to register, access and use, and assessment information is updated each year following a prompt, so that they can record improvements over time. This is important to encourage participation from suppliers and improve supply chain transparency.

Supply chains through Australia's water services industry are complex, with many suppliers working in different capacities for multiple organisations at the same time, and so the group is supported by [Better Sydney](#) for subject matter expertise and resource management, with Informed365 providing the technical expertise around the platform itself. The data provided by Informed365 does not provide an assessment of every single current supplier, but a sample of responses from across the supplier base that can be used to understand progress, assess risks, and prioritise areas for action and engagement.

Supplier engagement and education

By using the WSAA supplier platform and answering the questions, suppliers can make sure that a broad range of clients see their responses, and they only report on the data once a year rather than multiple times in varying formats for different customers.

Each section of the assessment explains why the information is important, providing context and background to the questions, and tries to encourage honest responses without leading respondents to preferred outcomes. In addition, suppliers gain access to the most relevant free online educational resources within every section of the platform, and they can measure progress in their actions and responses year on year. Each section of the platform also links to a PDF of current educational resources, updated each quarter, so that suppliers can download and explore the most useful materials for their organisation.

Rolling out a uniform platform across the water services industry is already helping to improve reporting efficiency and encourage greater supply chain transparency.

Priorities and emerging issues

In FY24, guest speakers from across different private and public sector organisations were invited to discuss modern slavery approaches with the WSAA platform partners. This helped to identify and priorities actions for the WSAA platform partners for FY25 and included a focus on grievance mechanisms and remediation, supplier engagement and education around potential risks of harm to people through modern slavery, and continuous improvement across supply chains and through reporting.

Addressing and Managing our Modern Slavery Risks

Organisations that have greater visibility of their operations and supply chains are more likely to operate efficiently, have better working relationships, and be able to assess and address risks including modern slavery. Businesses should use their leverage to work with suppliers that have caused negative impacts to people in the past, to remediate, prevent or mitigate the harm and its recurrence. If this is unsuccessful, organisations should consider ending their business relationship with those suppliers.

Collaboration and improvement

Addressing modern slavery risks can be a complex and challenging process and suppliers' responses and collaboration with other organisations will evolve over time. As suppliers go through this assessment, it is important that they focus on how they can continue to improve their supply chains and refine their responses in future years and are supported in doing so. For example, the information they provide each year may help suppliers to discover new areas of modern slavery risk that they need to address, identify different skills gaps or strong protocols, which in turn will help with supply chain reporting and modern slavery statements.

WSAA members benefit from monthly meetings at which they can discuss emerging opportunities, risks and trends, and receive updates on educational resources, reports and toolkits, invitations to events and briefings, and hear from guest speakers on current, relevant topics across sustainable procurement, supply chains, human rights and modern slavery. This collaboration aims to support continuous improvement, sharing skills and knowledge, and increasing leverage and access to best practice examples.

Procurement function restructure

The responsibility for coordinating and managing modern slavery risks lies within the Procurement Team. The team has embarked on a significant procurement transformation journey, characterised by a thorough review of its operations and subsequent approval of strategic recommendations to build a center-led function. These measures have been carefully devised to strengthen our organisations capacity to effectively mitigate a spectrum of risks, including modern slavery.

During FY24, the procurement transformation initiative was set in motion with the establishment and recruitment of new roles. The new roles include dedicated social procurement resources that will provide the necessary resources and

expertise essential for the identification and management of procurement risks, including the critical aspect of modern slavery, across various stages of the procurement process.

Centre-led Procurement model at GWW

GWW's procurement model follows a hybrid approach dependent on the nature of the procurement activity, whether transactional or strategic.

The central Procurement team takes the lead in strategic procurement initiatives coordinating and managing high-complexity procurement activities. GWW maintains a set of guidelines, framework, policies and procedures that enable different business units to determine the level of involvement required from the Procurement team.

Transactional Procurement

GWW employs a decentralized procurement model for transactional procurement, wherein each business unit is responsible for the purchase to pay lifecycle process within the framework and systems established by the Procurement function. Business units independently engage with suppliers and arrange contracts for low-risk engagements.

To further support compliance, the Procurement function has introduced a 'How Do I Buy' tool to ensure stakeholders who undertake self-serve procurement can do so in accordance with our Procurement Policy and ensure they're using the correct templates to ascertain and manage Modern Slavery risks.

Contract Terms

Buyers are directed to use the GWW standard terms in procurement engagements initiated by the business units. Where there are deviations to from the standard terms, the Legal team is engaged to ensure oversight.

GWW has undertaken to review its contracts to incorporate Modern Slavery clauses and the requirement to complete the Supplier questionnaire on the Informed365 platform. This enhancement will ensure early-stage consideration for modern slavery risks in the procurement process.

Promoting Transparency

In line with Victorian Government Purchasing Board (VGPB) obligations, GWW periodically discloses key details such as supplier name and goods or services procured on contracts over \$100,000 (including GST) on the Tenders Vic website, which is publicly available.

Our Progress to Date

GWW remains determined to address modern slavery risks across the breadth of our organisational culture, systems and processes.

FY2021

- All suppliers sent the Supplier Code of Conduct
- Development of Modern Slavery Statements & Content

FY2022

- Development of Industry Educational Material
- Planning of a supplier portal to receive Water Industry Modern Slavery Accreditation.

FY2023

- Joint procurement of a supplier portal, Informed365 to streamline and maximise the automation of data collected from supply chain businesses.
- Implementation of third-party supplier portal to identify potential risk exposure and work collaboratively to mitigate risks with our suppliers.
- Enhanced supplier engagement, due diligence, and risk assessment.

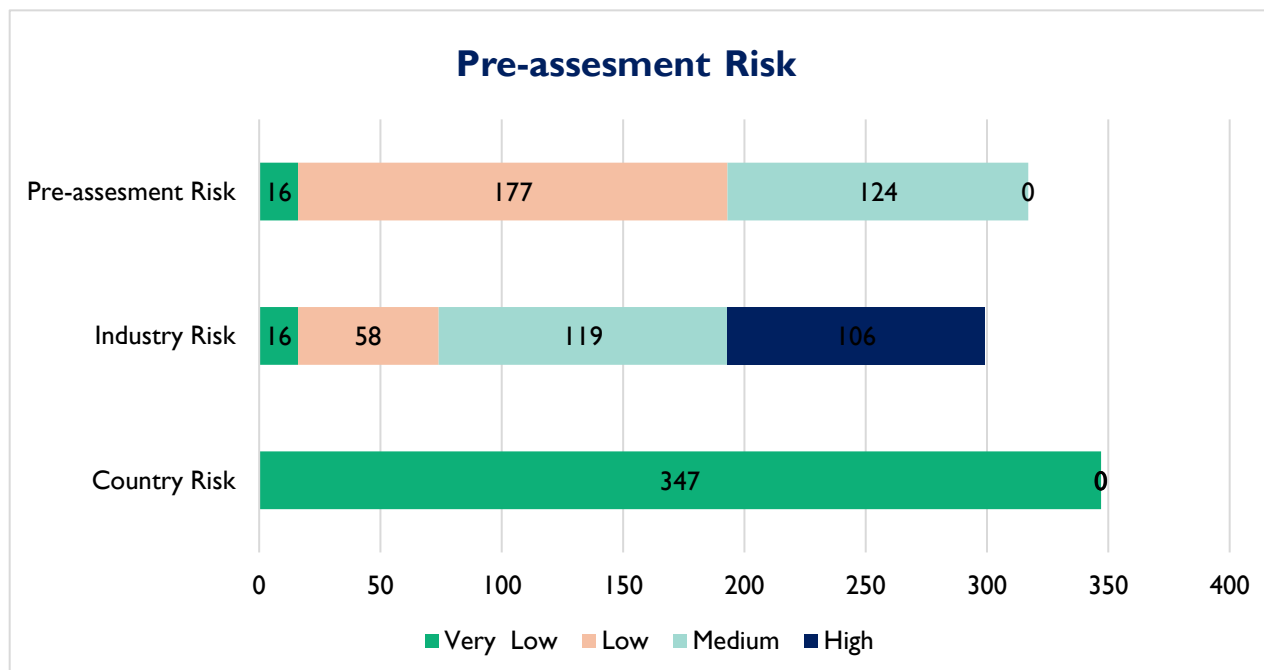
FY2024

- Of the 341 suppliers engaged by GWW, **339** have completed the assessment.
- Continued detailed examinations of high-risk areas of our supply chain.
- Worked together with other Victorian water authorities to collaboratively assess supplier risk
- Reviewed GWW contract templates to incorporate Modern Slavery clauses and the requirement to complete the Supplier questionnaire on the Informed365 platform.

Risk Summary

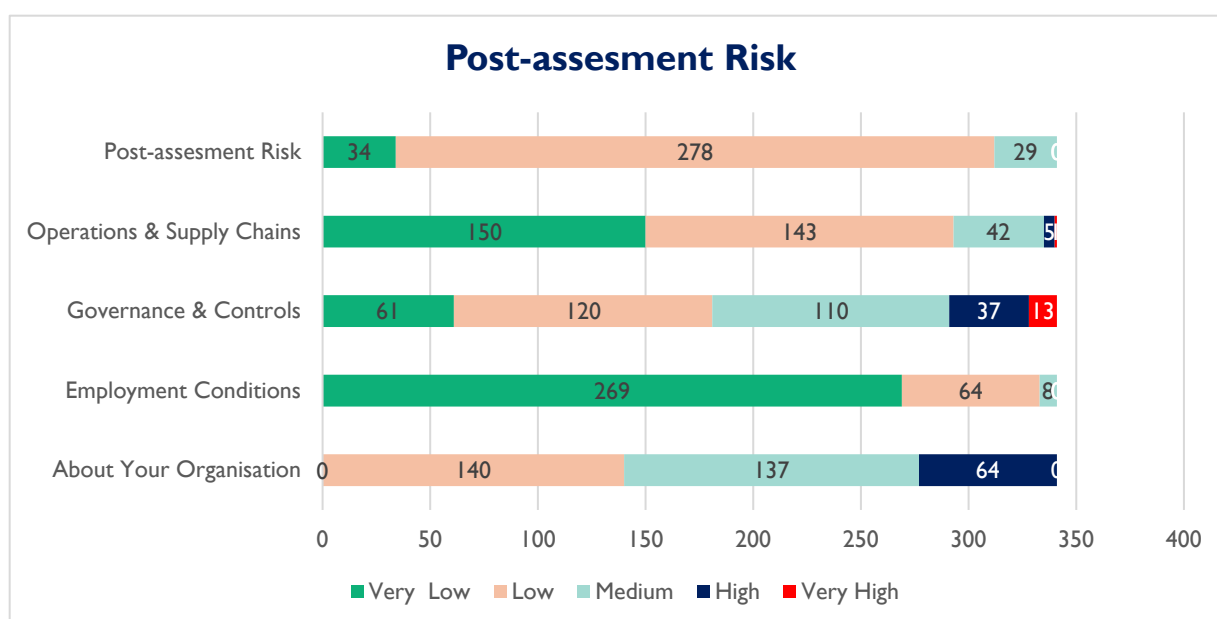
Pre-assessment Risk

The Pre-assessment Risk is based on the initial review of the risk profile of the supplier base before the completion of the survey and assessment tool and is the sum of the industry risk and country risk with equal weighting.



Post-assessment Risk

The Post-assessment Risk is the supplier risk that remains after the industry agreed assumptions have been applied to individual suppliers based on their survey results. The results are aggregated to provide the post assessment risk of each category before controls or measures have been applied. This profile enables GWV to then tailor our work program to focus on those areas where the post assessment risks exceed GWV risk tolerances.



Modern Slavery Governance

The Greater Western Water Central Procurement Team has the responsibility of overseeing and managing the risk associated with Modern Slavery.

It reports and makes recommendations to the Executive Leadership Team and the Board where required, through reporting papers and presentations.

Policy

Greater Western Water adheres to the Victorian Government Purchasing Board (VGPB) Supplier Code of Conduct. As a Victorian Government, GWW is committed to ethical, sustainable, and socially responsible procurement. The VGPB Supplier Code of Conduct describes the minimum expectations in the areas of integrity, ethics, conduct, conflict of interest, gifts, benefits, and hospitality; corporate governance; labour and human rights; health and safety; and environmental management.

You can view the full policy at <https://www.buyingfor.vic.gov.au/supplier-code-conduct>

GWW also adheres to the Victorian Government Fair Jobs Code. The code which came into effect on 1st December 2022, promotes labour standards and encourages compliance with employment, industrial relations and workplace health and safety obligations.

To ensure compliance, GWW includes Fair Jobs Code clauses are included in threshold procurement and approach to market documents, contracts and grant agreements.

Further details on the code can be viewed here - <https://www.buyingfor.vic.gov.au/fair-jobs-code>

Other key policies that integrate our actions to address modern slavery into our work include;

Governing document	Relevance to modern slavery	How we implement it
Supplier Code of Conduct	Outlines GWW's baseline expectation that suppliers comply with the laws and regulations, must not be complicit in any human rights abuses and must endeavour to ensure that there is no modern slavery in their operations or supply chain.	The Supplier Code of Conduct forms part of our supplier contractual terms.
Code of Conduct Policy	Outlines duties, obligations and responsibilities, and provides guidance where faced with an ethical dilemma.	Provided to all new starters at GWW and also available on the intranet. GWW people are kept informed of their obligations through annual online learning modules, internal communications and other training where required.
Risk Management Policy	Provides a structured and consistent approach to managing risks across GWW, including modern slavery risk.	GWW people are required to identify and proactively manage risks to guide day-to-day operations and decision-making.

Governing document	Relevance to modern slavery	How we implement it
Safe, Inclusive and Respectful Workplace Policy	Ensures that GWW achieves Equal Employment Opportunity (EEO) objectives, and that no discrimination takes place and actively promotes substantive equality.	GWW people are required to follow the standards of behaviour outlined in the policy and encouraged to report any potential breaches.
Whistleblower Policy	Provides a platform for GWW people (including those in our supply chain) to confidently raise concerns.	GWW provides an independent channel through which its people can raise concerns, with the option for anonymity for those who are looking to protect their identity.
Complaints Resolution Policy	Recognises the importance of feedback as a mechanism for continuous improvement and sets out the principles that govern our response to complaints, concerns, or feedback.	<p>GWW promotes a positive risk culture where its people, customers and community are encouraged to proactively speak up about concerns, incidents and issues.</p> <p>GWW People, customers and the community have various channels and mechanism to raise complaints, concerns and feedback about the actions of GWW, both internally or externally.</p>
Dispute and Grievance Procedure	Provides a clear and transparent process for dealing with staff related grievances.	<p>Provided to all new starters at GWW and also available on the GWW intranet.</p> <p>Provides a quick, confidential and without prejudice framework for dealing with internal disputes or issues requiring resolution.</p>

Effectiveness of our Actions

The establishment of WISVPWG as a community of practice has enabled increased transparency and knowledge-sharing between Victorian Water Corporations (VWCs). By collectively identifying and addressing common sustainability issues, including human rights, and working together to capture opportunities, this group is more rapidly able to determine which actions are consistently effective in achieving their desired outcomes, and share the lessons they have learned.

By bringing the VWCs together, this introduces a level of accountability to each other to contribute to the progress of initiatives, which sets the group up for a culture of continuous reflection and improvement. The WISVPWG has fostered a culture of continuous improvement by inviting third party specialists to support the development of the work program, co-design and facilitate category strategy development Workshops, and co-design and facilitate modern slavery capability building workshops. By seeking external guidance and insight, the WISVPWG is challenged and aided to understand where they have been effective in collectively addressing modern slavery in their industry's supply chains and to identify opportunities to improve their approach.

Internal Review

GWW continues to evaluate the effectiveness of our actions to address modern slavery risks and continues to improve based on feedback from key stakeholders.

Collaboration across the Industry

GWW continues to work with other water authorities to share insights and actions relating to modern slavery in the water industry, including WSAA. During FY24, WSAA members regularly met to discuss progress with implementing the Informed365 platform, make improvements as well as discuss modern slavery issues affecting the industry. In addition to this, Informed365 and Better Sydney hosted a round table even for WSAA members, *'Understanding Modern Slavery in our Supply Chains: Tier 2 and Beyond'*. The focus of the event was to look beyond our direct suppliers and through our supply chains to understand our opportunities and risks.

Policy framework

GWW has a large array of policies, frameworks and procedures in place to ensure our procurement processes follow best practice governance and are detailed in the [Modern Slavery Governance](#) section of this document.

Consultation, engagement and approval

Engagement with parties external to our organisation is sought to enhance the GWW modern slavery compliance program, informing the delivered actions which are reflected in this Statement and endorsed by our Board.

Consultation

Greater Western Water does not own or control any other entities, form part of any other trading entity or engage in joint ventures.

Industry Collaboration

Our progress in FY24 has been supported by our continued involvement with WSAA, providing regular opportunities to share insights with other water organisations.

The implementation of the *Informed 365* platform is a valuable output of this collaboration. In addition, learnings from the shared insights of the other water organisations continues to drive the continuous improvement of our own modern slavery compliance program.

Approval

This Modern Slavery Statement was approved by the Greater Water Board of Directors at the 10 December 2024 meeting and is signed by the Chair of the Board.

Other Information

Continuing our work

GWW will focus our future actions on expanding our education activities to ensure that people working in our supply chains, as well as those who use our products and services, are aware of their rights and available pathways to support.

Key priorities for FY25 include:

- continuing to develop robust modern slavery **governance processes** by:
 - reviewing our modern slavery governance processes to ensure that they are consistent with our maturity in this area and focused on embedding modern slavery risk assessment in organisational processes.
- developing our processes to **identify and address risks in our operations**, including by:
 - reviewing and updating our operational risk assessment processes to ensure they are fit for purpose.
 - reviewing our engagement and governance processes for fundraising agencies.
 - expanding our third-party risk screening processes.
- increasing the **awareness and engagement of GWW people and stakeholders** by:
 - conducting modern slavery drop-in sessions
 - expanding on our existing training modules to include modern slavery.
 - reviewing and updating the modern slavery sections of our intranet and internet to create a one-stop-shop for modern slavery resources and support pathways.
- continuing to develop the effectiveness assessments and KPIs that underpin our **reporting framework** and cross organisational engagement activities.
- further **engagement** with our **supply chain** and **industry peers** to systematically **identify and address risks in our supply chain**, including by:
 - continuing our supplier onboarding, risk screening and due diligence processes and exploring ways to increase supplier engagement in these processes.
 - develop a vetted supplier list to encourage staff to purchase from suppliers who meet our modern slavery requirements.
- working with suppliers in high-risk sectors to increase their awareness of modern slavery risks, indicators and avenues for support.
- investigations into any potential breaches, and where.
- **Tier two** (and beyond) assessment to explore additional opportunities to investigate modern slavery within our deeper supply chains.





**Greater
Western
Water**

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