

Modern Slavery Statement

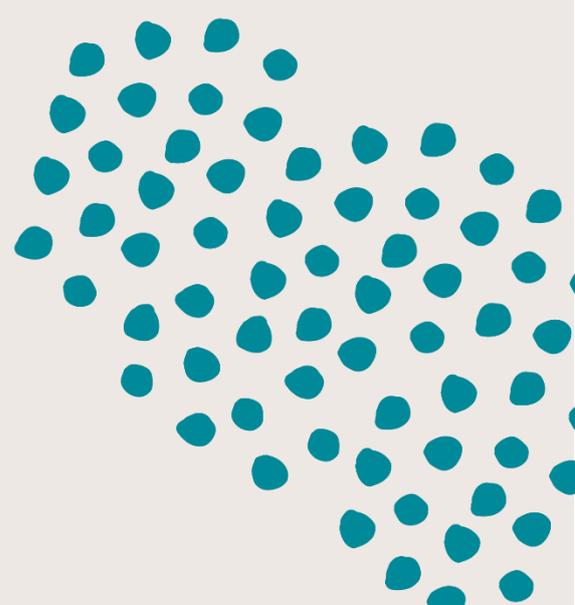
2024-25



Acknowledgment

Barwon Water recognises Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation and proudly acknowledges the Traditional Custodians of the lands and waters on which we live and work. We pay our respects to Elders past and present and recognise that the lands and waters of Eastern Maar and Wadawurrung were never ceded.

In our commitment to reconciliation and truth-telling, we acknowledge the enduring connection of First Nations peoples to Country and the wisdom they bring through sustainable land and water stewardship over tens of thousands of years. This deep knowledge continues to shape our understanding of ethical and responsible practices.



Message from our Managing Director

Modern slavery continues to be a devastating global issue—systemic, widespread, and deeply rooted in inequality. Vulnerability to exploitation is shaped by a complex web of factors including poverty, gender, migration status, education, and employment insecurity. Increasingly, climate change, geopolitical conflict, and natural disasters are contributing to displacement and disruption, further heightening the risk of modern slavery.



At Barwon Water, we understand that our responsibility to uphold human rights extends beyond our immediate operations. Our procurement decisions can have far-reaching impacts, and we are dedicated to promoting practices that reduce the risk of exploitation in any form.

Guided by our Strategy 2030, we are working to enable regional prosperity through ethical leadership, inclusive partnerships, and sustainable practices. We Care—about our people, our customers, our community, our environment, and human rights. That is why we remain focused on our commitment to identifying and mitigating modern slavery risks.

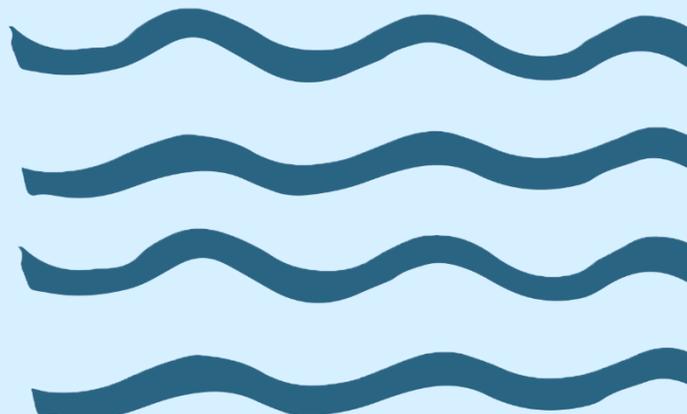
Now in our sixth year of reporting under the Modern Slavery Act 2018 (Cth), Barwon Water continues to take a proactive and collaborative approach to managing modern slavery risk. Our capabilities have matured through the implementation of policies, training, and supplier engagement tools that promote transparency and accountability across our supply network.

While we have not identified any specific instances of modern slavery within our operations or supply chains, we recognise that risk mitigation is a continuous journey. We remain focused on strengthening our governance, deepening our supplier relationships, and embedding modern slavery awareness into our procurement practices.

This Statement outlines the actions we've taken in 2024–25 to identify, monitor and mitigate modern slavery risks across our operations and supply chains. It applies to both Barwon Water and our wholly owned subsidiary, Barwon Asset Solutions, and was approved by our Board of Directors on 20 November 2025.

A handwritten signature in black ink, appearing to read 'Shaun Cumming', written in a cursive style.

Shaun Cumming
Managing Director





About the Barwon Water Group

Barwon Region Water Corporation trading as Barwon Water (ABN 86 348 316 514) is Victoria's largest regional urban water corporation, providing world standard water and sewerage services to more than 370,000 permanent residents over 8,100 square kilometres. Over the holiday period, the serviced population can expand to more than 600,000 people.

A statutory corporation under the *Water Act 1989* (Vic), Barwon Water's history can be traced back to the Geelong Municipal Waterworks Trust in 1908.

Barwon Water is led by a Board comprised of nine non-executive directors and the Managing Director, who are responsible for the overall corporate governance of Barwon Water, including strategic direction, management goals and measuring success. The Board has been appointed by the Minister for Water and is governed by the *Water Act 1989* (Vic); it is supported by five General Managers who are responsible for leading their functional business divisions.



As a major employer in the region, Barwon Water currently has 410 operational, engineering, strategic planning, financial and administrative employees (389.53 FTE).

Barwon Water's wholly owned subsidiary, Barwon Asset Solutions (ACN 167 911 515), was formed in 2017. Barwon Asset Solutions provides maintenance, land and project management, and contact centre services to Barwon Water, the region and the water sector. Barwon Asset Solutions' profits and efficiency-generated savings are returned to Barwon Water to help it deliver its service and keep customer bills low. Barwon Asset Solutions has 153 employees (144.85 FTE).

Our ways of working at Barwon Water are underpinned by our core values of Care, Inclusion, Safety, Accountability and Courageousness.

Barwon Water's service region includes parts of the traditional lands of Wadawurrung and Eastern Maar, the Registered Aboriginal Parties and Traditional Owners, stretching from Little River and the Bellarine Peninsula in the east to Colac in the west, and from Meredith and Cressy in the north to Apollo Bay on the southwest coast. The service area incorporates local government areas of City of Greater Geelong, Borough of Queenscliff, Surf Coast Shire, Colac-Otway Shire and part of Golden Plains Shire.





Operations and Supply Chains

Barwon Water is committed to operating our business lawfully and ethically and working with suppliers that are aligned to our values, including corporate social responsibility, environmental and workplace safety, and staff inclusion and diversity. Barwon Water requires our suppliers to operate in accordance with all applicable modern slavery laws.

The Barwon Water Group has three Enterprise Agreements which provide terms and conditions, including hours of work and pay, for the vast majority of its employees. The Agreements are negotiated every 3-4 years with the respective unions, are governed by the State Government's Industrial Relations policies, and require approval from the Fair Work Commission. Agreements are made available to all employees upon commencement of employment and remain available to employees through the Barwon Water intranet and Fair Work Commission website.

The majority of our workforce comprises permanent employees. Approximately 1.3% of our workforce is casually employed (scholarship students) and approximately 3% is fixed term, primarily backfilling long term leave or specific projects. We also engage third party resources via employment agencies, for short term and project specific needs.

Our annual procurement spend is governed by the provisions of the Victorian Government Purchasing Board (VGPB), and our own Procurement Policy and Procurement Governance Framework, which guides our activities to encourage practices that contribute to social, economic and environmental objectives. We strive for purchases that represent value for money and are sourced responsibly.

Barwon Water's operations make a significant positive contribution to our region's economy and livability. During 2024-25, the organisation had a \$337.8 million turnover supported by \$3.9 billion in assets and spent \$158 million on capital and related infrastructure works. Barwon Water's supply chain includes the purchase of products and services needed for the businesses day-to-day operations including water and wastewater treatment chemicals, materials, external technical and professional services, office supplies, employment and training of staff, external legal advice, IT infrastructure and support services.



Procurement spend

While the diversity of the goods and services we procure can potentially expose Barwon Water to risks across several industry sectors, we apply a systematic approach to managing risk throughout our procurement decision-making processes, which we consider an essential element of identifying and addressing modern slavery practices.

The table below shows our major categories of procurement spend to support our capital projects and core operational functions.

Category	% of total procurement spend
Construction	42%
Maintenance Services (Barwon Asset Solutions, and Maintenance, Plumbing and Electrical Panels)	20%
Consultants (Technical, Engineering and ICT)	8%
Biosolids Management	5%
Electricity	5%
ICT Software, Hardware and Projects	4%
Fleet Management, Services and Vehicles	3%
Labour Hire / Staffing Solutions	2%
Minor purchases <\$50K	2%
Other (e.g. facilities management, chemical supply, supply and reading of water meters, laboratory services, insurances etc.)	9%

Risks of modern slavery practices

Barwon Water has formal policies in place that promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business including the Supplier Code of Conduct, Public Interest Disclosure (whistleblower) Policy and Procurement Complaints processes.

Barwon Water is a foundation member of the Water Industry Procurement Working Group (WIPWG), previously known as the Social Procurement Working Group, a VicWater coordinated group of Victorian water corporations, initially formed in 2017 to address social procurement, then expanded to include modern slavery risk in the supply chain.

The WIPWG undertook a risk assessment of the industry's products and services to determine where efforts should be focused. A customised heat map, aligned with ISO 20400, was developed which ranked potential modern slavery risk across the sector's operations and supply chains. We have reviewed the heat map against our operations, industry trends and global risk indicators, and have determined these categories to still be the areas for continued focus:

- **Asset maintenance:** ongoing operations and maintenance of facilities, including cleaning and security services, grass cutting, herbicide application.
Why it's risky: Low-wage, subcontracted, and often migrant workforces; historical prevalence of underpayment, coercion and third-party labour arrangements.
- **Construction:** construction labour and engineering technical services.
Why it's risky: Multi-layer subcontracting, seasonal peaks, third-party labour, and materials with global supply chains. Use of offshore studios and contingent labour in jurisdictions with weaker protections; opaque subcontracting.
- **Corporate:** temporary staff, labour hire and traineeship programs.
Why it's risky: Third-party recruitment/intermediaries are a classic risk vector (fees, deceptive recruitment, document retention). This cuts across services in facilities, construction, ICT and customer contact roles.
- **Customer:** debt collection services, customer research services.
Why it's risky: Where these services are outsourced, especially if offshore or through multi-layer agents, the same labour risks apply (short-term contracts, wage theft, pressure-based KPIs).
- **Equipment and materials:** mechanical and electrical equipment, chemical products, uniforms and PPE.
Why it's risky: Complex, multi-tiered global manufacturing (metals, components, sub-assemblies) with opaque sub-tiers. Raw material extraction/processing often spans higher-risk geographies; price and supply shocks can drive cost-down pressures into labour conditions.
- **ICT:** offshore IT services.
Why it's risky: Electronics production is widely recognised as a high-risk sector; offshore development/support adds geographic and labour-broker risks.

Actions taken to assess and address these risks

Conducting due diligence at the beginning of, and throughout, a sourcing event is a crucial part of the evaluation process, making sure suppliers and contract partners are aligned to our ethical and good practice procurement processes. Contractual clauses, tender templates, supplier evaluation tools and contract management are continually reviewed and enhanced or developed to mitigate modern slavery risk. Specific ways risk has been addressed within each category include:

- **Asset maintenance:** Insourced via our wholly owned subsidiary, Barwon Asset Solutions, enabling direct oversight, control and enhanced stakeholder management. Additional reporting and assessment is conducted for our facilities cleaning contract, with annual modern slavery compliance statements required from our cleaning contractor.
- **Construction:** Health, Safety and Wellbeing checklists and audits embedded. Modern slavery clauses strengthened within our Technical Services Partner and Specialist Technical Services contracts.
- **Corporate:** Staffing Services State Purchase Contract used, ensuring pre-qualified suppliers used by Barwon Water are operating in accordance with the VGPB's well-established and vetted supplier arrangements. Our Recruitment Policy has been designed to support hiring processes that are equitable, fair, transparent and based on merit. All employees are engaged under contracts that are, at a minimum, covered by the appropriate modern award and can choose whether they join a union.
- **Customer:** Insourcing of what is generally known as debt collection and modifying associated customer contacts to 'Engagement and Health Check' calls.
- **Equipment and materials:** Contracts recognised as having a higher human rights risk are identified and reviewed during procurement planning sessions. Appropriate modern slavery items are inserted into tender documentation, including agreement to work with Barwon Water to improve their modern slavery position.
- **ICT Development and Support:** ICT development and support is either insourced or wholly sourced locally (including subcontracting) if insourcing is not possible.

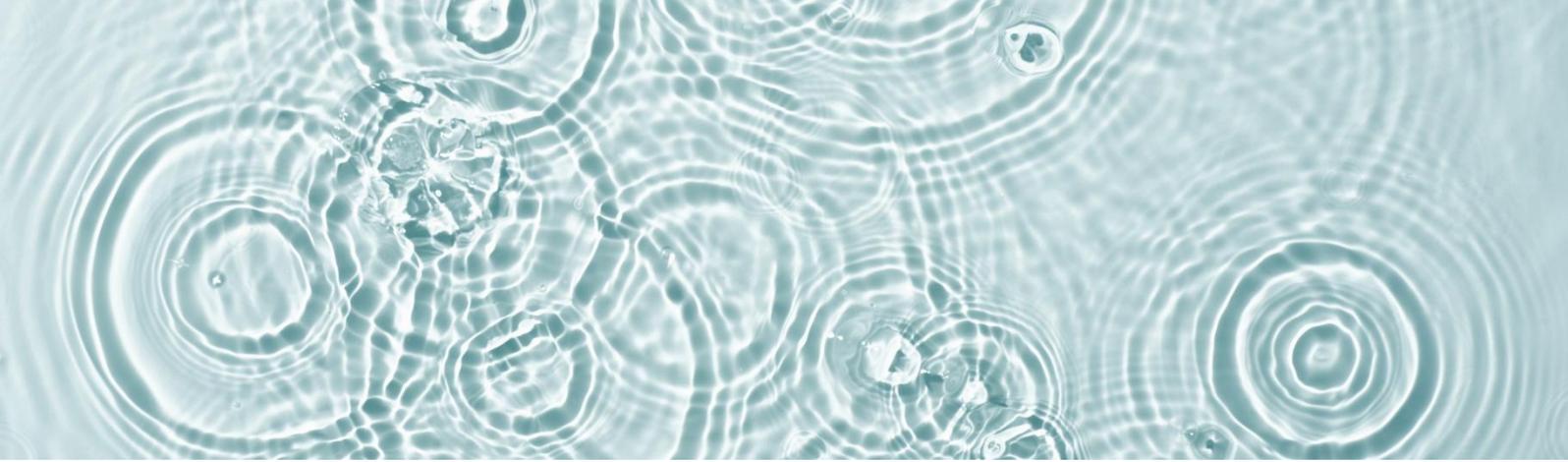
Monthly collaboration with Water Services Association of Australia (WSAA), Robin Mellon (CEO Better Sydney & Director UN Global Compact Network Australia) and a nationwide consortium of interested water sector members continued during 2024-25, promoted knowledge sharing of best practice across the sector. Innovative ways of working, such as using the Informed365 tool to digitise collection of supplier modern slavery data, has helped to focus our attention on suppliers, and / or supplier categories, that present actual or potential higher risk.



How our processes address these risks

Barwon Water has a suite of policies, procedures, codes and standards, that are relevant to modern slavery and summarised in the table below.

Document name	Purpose
Code of Conduct	Outlines the expected behaviours of Victorian Public Sector Employees. The Code includes provisions relevant to fair employment and recognising and respecting the human rights of all people.
Supplier Code of Conduct	Describes the minimum expectations we have of our suppliers and their supply chains in relation to integrity, ethics and conduct; corporate governance; labour and human rights; health and safety; and environmental management.
Compliance Management Policy	Outlines Barwon Waters' commitment to meeting our legislative compliance obligations in the delivery of our products and services.
Complaints and Disputes Procedure	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.
Procurement Policy	Sets out the principles that govern the procurement of all goods and services by Barwon Water.
Purchasing Manual	Provides guidance on the practices, requirements and processes to be applied to Barwon Waters' procurement activities to ensure we achieve the principles of the Barwon Water Procurement Policy.
Public Interest Disclosures Policy	Outlines how Barwon Water meets its obligations under the Public Interest Disclosure Act 2012. The Policy provides a platform for people, including those in our supply chain, to confidently raise concerns externally.
Charter of Human Rights and Responsibilities	Outlines how Barwon Water will meet its obligations under the Charter of Human Rights and Responsibilities Act 2006 and provides guidance as to when and how human rights should be integrated into Barwon Waters' decision-making processes.
Tender Documentation Suite	The suite of tender documents ensures modern slavery is considered and appropriately addressed during all stages of the tender process i.e. market engagement (tender booklet), tender evaluation (evaluation template), and contractual clauses.
Employee Training	Modern slavery information is captured in our Procurement e-learn, which staff are required to complete on an annual basis. The optional Modern Slavery e-learn is also available to all staff.



Achievements in 2024-25



Embedded usage of Informed365 platform and increased supplier enrolment by 15%, to 291. Identified average supplier risk of modern slavery as 'low'. (Note: refer p.13 for additional information regarding Informed 365.)



Continued to embed the consideration of human rights impacts in our actions and decision-making processes, including in new and existing policy and guidance documentation, procedures (tender documentation suite) and standards, to align with our legislative and social obligations and risk profile.



Twenty modern slavery resources were embedded within the Supplier Assessment Questionnaire. Suppliers across the consortium accessed these free learning resources 314 times.



Modern Slavery posters developed to inform staff, contractors and visitors on signs that may indicate instances of modern slavery and what to do should they identify an alleged instance of modern slavery.



Annual review of the Supplier Assessment Questionnaire, which included updating and reducing questions in order to streamline the questionnaire and reduce supplier burden and fatigue.



Assessing effectiveness of actions

Supplier assessment platform

During 2024-25 Barwon Water has continued working with technology provider Informed365, WSAA, and a national consortium of water sector members to assess and address modern slavery risks through our supply chain. This collaborative approach has allowed consortium 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.

Suppliers are invited to register and enter information about actions they are taking to assess and address modern slavery; this data can then be accessed by consortium members 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 improvements over time can be recorded.

Barwon Water commenced staggered supplier onboarding into Informed365 in January 2024. During 2024-25 modern slavery assessments were issued to 291 contracted high-risk suppliers. 146 suppliers completed the assessment in 2023-24, and 57 refreshed their responses in 2024-25. Many of these suppliers have opted to share their completed assessment with other consortium members. This approach maximises consistency across the industry, streamlines the reporting process for the suppliers involved, and reduces administrative burden.



Supplier engagement and education

The Informed365 platform enables suppliers to select consortium members they permit to view their responses, meaning less 'assessment' fatigue. Each section of the supplier assessment explains why the information is important, providing the 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, with resources updated multiple times per year.

Has your organisation used labour hire providers?

Yes, we have only used licensed labour hire providers

Yes, we have used both licensed and unlicensed labour hire providers

No, we have not used labour hire providers

Has your organisation or your labour hire provider recruited any employees or workers from overseas, such as temporary or casual migrant workers?

Yes

No

Not sure

Sole trader / individual (so not applicable)

Are your employees or contract workers free to lawfully resign their employment without restriction or penalty?

Yes

No

Does your organisation undertake checks to ensure all employees and workers are above the minimum age for work?

Yes

No

Image: Sample questions from 'Employment Conditions' section of the Informed365 supplier assessment.

Community of practice

By bringing water corporations together from all over Australia, the WSAA Procurement Network represents a community of practice and introduces a level of accountability to participants to contribute to the progress of initiatives, setting the participants up for a culture of continuous reflection and improvement. The group has worked together to develop and implement a collaborative, ongoing program of work with the ambition to take an industry-leading position in how it responsibly manages its operations and supply chains.

Continuous improvement

The WSAA Procurement Network has fostered a culture of continuous improvement by inviting third party specialists to support in the development of their work program, provide advice about best practice in the sector and recommend potential solutions to uplift future ways of working. By seeking external guidance and insight, the network 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. Guest speakers during 2024-25 have included:

- Lucy Forbes, Acting Senior Legal Policy Officer, and Emma Dalco, Business and Human Rights Policy Officer, from the Office of the NSW Anti-slavery Commissioner, to speak about their work, and outline the Guidance on Reasonable Steps (released in December 2023) and the Inherent Risk Identification Tool (IRIT) that accompanies it.
- Jessica Irwin, Ethical Business Advisor, and Sally Irwin, CEO and Founder at The Freedom Hub, who detailed their work with organisations of all kinds, the meaningful engagement of people with lived experience, and opportunities to engage with the work of The Freedom Hub.
- Catherine Predika, Manager of Governance and Sustainable Procurement at AusNet Services provided an update on the development of a Security of Critical Infrastructure question set for suppliers, and possible points of collaboration.

The network has leaned into the support offered by an independent modern slavery expert to ensure modern slavery supplier survey questions capture the data needed to enable adequate supplier assessment. Outcomes can then be linked to resources, if needed, to provide suppliers with an opportunity to improve their performance.

Ongoing review of effectiveness of controls

Barwon Water recognises that the risks of adverse human rights impacts are complex and continually changing – as is our business. We will continue to prioritise inclusion of high risk, high spend and high complexity suppliers into the Informed365 platform to assist us in conducting regular modern slavery risk reviews.

Whilst Barwon Water has not identified any specific instances of modern slavery harm in our supply chain, should issues be identified, our approach will be to work collaboratively with our suppliers to address harm and mitigate exposure.



Looking forward

Having laid the foundations for a rigorous anti-slavery response over the last six years, Barwon Water remains committed to continually improving our understanding and management of modern slavery risks. Our approach to managing the risk of modern slavery will continue to evolve as we learn from our supplier assessments, refine our practices and continue to build knowledge and capacity across our business.

The actions planned for 2025-26 include:

- Research and implement stronger engagement methods to uplift supplier response rate to initial and annual modern slavery assessments.
- Conduct a robust assessment of suppliers identified in the Informed365 platform as having 'high' modern slavery risk. Work with suppliers to better understand the issues. Seek advice from subject matter experts regarding remediation planning.
- WSAA, Informed365 and national water sector consortium members to consider leveraging our work in the modern slavery space to apply it to requirements under the Security of Critical Infrastructure Act (2018).
- Review and evaluate existing Construction procurement controls to determine their robustness and responsiveness to modern slavery risks and implement enhancements where required.

Continued participation in water sector collaboration

Barwon Water will continue to work with the WIPWG and the WSAA network in order to seek continuous improvement and shared learnings on how to identify, address and reduce modern slavery risks within our supply chains and operations.





Appendix 1

This Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below identifies where each criterion is disclosed within the different sections of the statement.

Mandatory Criteria	Reference in this statement
Identify the reporting entity.	About the Barwon Water Group (p4-6)
Describe the reporting entity's structure, operations and supply chains.	About the Barwon Water Group (p4) Barwon Water's service region (p5) Operations and supply chains (p6) Procurement spend (p7)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of modern slavery practices (p8)
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Actions taken to assess and address these risks (p9) Processes to assess and address these risks (p10) Achievements in 2024-25 (p11)
Describe how the reporting entity assesses the effectiveness of these actions.	Assessing the effectiveness of these actions (p12-13)
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	Consultation with any entities the reporting entity owns or controls (p16)
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Looking forward (p14)

Consultation with any entities the reporting entity owns or controls

Consultation with various internal and external stakeholders has taken place to help us build our modern slavery capabilities and develop this statement, including:

- ongoing collaboration with other water corporations through participation in the Victorian and national water industry working groups.
- external third-party consultants and experts for their knowledge, insights and thought leadership.
- ongoing communication with internal business areas e.g. Governance, Procurement.

During the reporting period this statement covers, Barwon Asset Solutions was actively engaged and consulted with. We discussed details of the Modern Slavery Act 2018's reporting requirements, the actions we intend to take to address these requirements and provided them with relevant materials and updates.

Our Executive team has been involved in the review and endorsement of this statement for approval by the Board.

Further information



55-67 Ryrie Street
PO Box 659
Geelong Victoria 3220

☎ 1300 656 007 | ✉ info@barwonwater.vic.gov.au

barwonwater.vic.gov.au

f t y o i n

Korweinguboora Reservoir