

Modern Slavery Statement 2023-24





Since creation, the palawa have lived here in lutruwita – Tasmania. Over 2,000 generations of Aboriginal families have cared for this Country, looking after its lands, seas, skies and waterways.

In the spirit of respect and gratitude,
TasWater acknowledges the Tasmanian
Aboriginal community as the traditional
and ongoing custodians. We pay our
respects to them, their culture and to
elders past and present.

TasWater commits to working collaboratively and respectfully with the Tasmanian Aboriginal community to protect and sustain the precious resources on this ancient land for future generations.

Chair and CEO message

Modern slavery, encompassing forced labour, human trafficking, and other forms of exploitation, remains a profound violation of human rights and is a critical issue that demands our unwavering commitment to eradicating it from all aspects of society.

Tasmania is not immune from the global issue of modern slavery. The risks associated can manifest in various ways, including through supply chains, labour practices, and exploitation of vulnerable individuals.

Organisations such as ours play a vital role in identifying and addressing these risks to contribute to a broader effort against modern slavery.

This year's Modern Slavery Statement expands on our foundational work of the past four years and is reflective of our recently updated organisation wide values to achieve together, be courageous, care about our impact and deliver on our commitments.

"Our new values guide our words and actions, shaping how we work with each other, our customers and our community."

We have a significant role to play not only in providing essential water and sewage services, but also in upholding the highest standards of ethical conduct and human rights.

We are pleased that for this period, there have been no specific instances of modern slavery identified by any of our suppliers or their supply chains. During this year, we also undertook modern slavery screening of our supplier base to ensure they do not participate in activities of modern slavery using a software tool adapted by the Water Services Association of Australia (WSAA). Our participation with the WSAA Modern Slavery Working Group continued and will also continue this year.

Our approach to modern slavery is not just about compliance – it is about demonstrating our values and our commitment to ethical business practices. We believe that by working collaboratively with our suppliers, partners, and stakeholders, we can drive meaningful change and ensure that our operations are free from exploitation and abuse.

We are proud of the progress we have made over the past year, but recognise there is always more to be done. As we move forward, TasWater remains resolute in our commitment to tackling modern slavery and upholding the principles of fairness and respect in every aspect of our business.



Chairman
Dr Stephen Gumley AO



Chief Executive Officer
Mr George Theo

Our Performance in 2023–2024 and Future Priorities

In the 2023–24 financial year, TasWater did not detect any instances of modern slavery in our operations or supply chain. We recognise that this does not imply the absence of modern slavery, and we are continually improving our capacity to identify such instances within our operations and supply chain.

We are committed to improving our awareness and prevention of modern slavery risks in our operations and supply chain. During the 2023–24 financial year, TasWater made progress on various initiatives to support these aims.

We successfully launched a software tool to assess our suppliers for modern slavery risks, developed by the Water Services Association of Australia (WSAA) Modern Slavery Working Group. WSAA is a collective of water authorities and businesses committed to promoting best practices in Australia's water industry. By participating in this group and adapting the software, we can collaboratively collect data on our shared supplier base nationwide. The tool has screened more than 600 suppliers so far; including 110 TasWater suppliers, and we aim to significantly expand this number in the upcoming year. Additionally, TasWater has implemented a process to ensure that we do not engage new suppliers without completing this screening.

Initiatives	2023/24 Performance	2024/25 priorities
Strengthening governance	Establishment of Supplier Prequalification - we implemented a strong Supplier Prequalification screening process that enables TasWater to access organisations for modern slavery risk factors using an adapted software package endorsed by WSAA. We are rolling this out in stages, initially targeting new suppliers, with plans to focus on our existing supplier base over the next 12 months. Revised our Supply Chain Standard – we undertook a review of our internal Modern Slavery Standard to ensure it reflected our renewed commitment to comply with all current modern slavery practices and legislative requirements. Refreshed and improved our supply chain frameworks – to ensure continual maturity in delivering effective and positive outcomes for our business and stakeholders, we reviewed and revised our procurement standard, procurement framework, and contract management framework.	Perfecting our processes around the identification of modern slavery risks- by partaking in a continual improvement process of our standards, frameworks and supply chain practices, we will ensure we remain current, responsive to the changing risk environment and promote the exclusion of organisations who participate in modern slavery practices.
Managing emerging risks	Enhancement of our <u>Whistleblower Policy</u> by engaging a channel for employees and stakeholders to report any relevant matters via third-party, independent and confidential whistleblower service.	Supplier compliance to prequalification process – which will include an audit of existing supplier base with a focus on increasing the participation level and compliance with the WSAA Modern Slavery Screening tool.
		Development of a Supplier Code of Conduct to ensure our supplier base is aware and well informed of the importance TasWater places on upholding the values of our organisation and to promote the exclusion on organisational practices that contribute to modern-day slavery.
Building capability	Continuous Involvement in the WSAA Modern Slavery Working Group - we are actively participating to enhance our knowledge and strategies for addressing modern slavery within Australia's water service sector.	Ongoing participation in WSAA Modern Slavery Working Group – to further the development of knowledge and methods to combat modern slavery within Australia's water service industry.
		Education and Training – We are developing targeted training materials for employees, available in both in-person and eLearning formats, to emphasise the fundamentals of modern slavery and strategies to mitigate this risk across the organisation.
Assessing effectiveness	Published our third Modern Slavery Statement for 2022-23.	Ongoing monitoring and regular reporting of supplier compliance utilising the Informed 365 platform. This will include the development of Taswater standard reporting system for modern slavery screening results.

TasWater Overview

TasWater, officially registered as Tasmanian Water and Sewerage Corporation Pty Ltd (ABN: 47 162 220 653), operates as a corporation in compliance with the *Water and Sewerage Corporation Act 2012 (Tas)* and the *Corporations Act 2001 (Cth)*.

As of 30 June 2024, TasWater employed 928 FTE staff members across the state of Tasmania.

Our people are dedicated and passionate about providing exceptional water and sewage services for a thriving Tasmania. To do this, we source, treat, and deliver reliable, quality water to our customers. We also collect, transport, and treat sewage and safely return it to the environment in a sustainable manner.

Our vision is to unlock water's full potential, for which we have a Strategy in place to achieve.

To support our operations, TasWater's supply chain encompasses a broad range of direct and indirect goods and service providers that all play an integral role in ensuring the effective and efficient delivery of our services for Tasmanians. We paid more than 1,400 suppliers last year and our supplier base is 90 per cent Australian-based and predominantly Tasmanian.

About us

Our purpose is to provide exceptional water and sewerage services for a thriving Tasmania.

Each day, we serve more than 470,000 Tasmanians and Tasmanian businesses.

Our business is more than just taps and toilets. The services we provide help Tasmania to thrive in lots of different ways:

- Health and wellbeing clean drinking water and sanitation are human rights, fundamental to everyone's health, dignity and prosperity
- Environment sourcing water and discharging wastewater means interacting with our natural environment in a way that minimises environmental harm and enhances environmental value
- Economy secure, reliable, affordable water and wastewater services are crucial to the prosperity of industry and business

Our owners are the 29 Tasmanian councils and the Tasmanian Government. Our underlying profits are shared with all Tasmanians through annual dividends provided to local councils, which are reinvested back in the community.



Operations overview

As at 30 June 2024



471,727 Population supplied



224,321Number of water

connections



194,733Number of sewerage

connections



6,607Water mains (km)



4,958Sewer mains (km)



58
Water treatment plants



Level 1 sewage treatment plants



Level 2 sewage treatment plants



353
Dams under management



289 Water reservoirs



Water and sewage pump stations: Water 216, Sewer 731



928 FTE Employees (953 headcount) The key aspects of TasWater's supply chain consist of:



Goods and Services to support Service Delivery operations:

 Ongoing operational works on our water and sewage assets to manage safety and operating standards in line with regulations and service expectations of our customers. TasWater provides regionally focused Operations teams, who coordinate delivery of various goods and services including civil, mechanical, electrical works as well as incident response services.



Project Management and Construction Services:

Design, planning, construction, and maintenance of water and sewerage infrastructure to improve safety and reliability of water and sewage services to the Tasmanian community. TasWater has formed a Capital Delivery Office alliance to deliver its major infrastructure projects. Further details, including our operations and projects are set out in our FY24 Annual Report www.taswater.com.au/about-us/annual-reports



Support and Management Services:







Our approach to identifying modern slavery risks

TasWater has Risk Management Framework aligned to AS ISO 31000 that guides the identification, assessment, and mitigation of enterprise and operational risk.

TasWater assesses modern slavery risks considering the following assessment criteria:

Supply chain modern slavery risk

Country profile

The geographical location of a particular commodity can be an important indicator of risk based upon the vulnerability of the population, and associated government response

Sector/industry profile

The nature of work performed and required worker skill set, as well as product characteristics can all be key indicators of risk

Category profile

The total number of suppliers used, and annual spend data in each category can provide an indicator for the leverage available within the marketplace

Supplier profile

The historical performance and due diligence performed by a particular supplier and/or entity on modern slavery risk can become an important indicator for consideration

We also draw upon a combination of the following external resources. These include:

- Global Slavery Index 2018.
- Baptist World Aid Australia 2016.
- Electronic Industry Trends.
- Responsible Construction Leadership Group.
- Modern Slavery in Construction report.
- Online Register for Modern Slavery Statements (to view certain supplier submissions online).
- Various public articles, including media.
- Any relevant information submitted to our internal whistleblower hotline.
- Information submitted from suppliers in line with standard response schedules issued by TasWater Procurement during sourcing events was also used.
- WSAA Modern Slavery Working Group
- Information submitted from suppliers in line with standard response schedules issued by TasWater Procurement during Sourcing Events was also used.

Modern slavery risks to TasWater

We believe our greatest risk of involvement in modern slavery arises from our relationships with supply chain.

As a result, our framework for addressing modern slavery primarily focuses on our engagement and influence with direct suppliers. In our updated risk assessment for 2023–24, we identified 17 categories across technology, infrastructure, major construction projects, and corporate services that are potentially at higher risk. Our assessment is that the key categories flagged as high risk for TasWater have not changed from the previous year. These categories are:

Onsite cleaning services

This category will be prioritised for modern slavery screening due to the market's complexity, the nature of the labor force, and the industry's historical practices.

Spend for 2023-24: \$0.5m

Major project construction materials

These materials have been prioritised because many materials used in construction, including imports, carry significant risks of modern slavery.

Spend for 2023-24: \$246.2m

Uniforms and PPE

These items, most of which are imported, will be a focus based on external reports indicating that labor forces in sectors like textiles, including those involved in raw material harvesting and processing, are particularly vulnerable to modern slavery.

Spend for 2023-24: \$0.6m

Our workforce

TasWater's employment conditions are covered by the National Employment Standards (NES), which set out the 10 minimum employment entitlements that must be provided to all employees. In addition, most of our employees are covered by Enterprise Agreements, which are underpinned by Modern Awards, which set minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the NES.

Actions to address modern slavery

We have a responsibility to take steps to identify the risks of modern slavery within our operations and supply chain and appropriately put risk mitigation controls in place.

During the 2023-24 financial year, we continued to refine the way we identify these risks and have expanded our set of due-diligence processes across the business. These are outlined earlier in our Modern Slavery Statement on pages 5-6.

In addition to these improvements, TasWater also has a range of structures that assist in addressing Modern Slavery Risks.

Governance

TasWater's Board provides ultimate oversight of TasWater's Enterprise Risk Management Framework and systems of internal control, and an Executive Management Committee oversaw strategic aspects of procurement and sourcing, which included management of Modern Slavery risks.

Within TasWater, the Procurement business unit is responsible for operational management of the actions within TasWater in relation to addressing modern slavery risks.

Modern Slavery Standard

We recognise that modern slavery can include a range of exploitative human rights practices, and that it may also be connected to other serious criminal activity such as fraud, bribery, and corruption. TasWater has a Modern Slavery Standard that supports our governance and integrity framework.

Policy Foundation

Consistent application of policies and procedures across our operations and supply chains is key in our approach to managing the risks of modern slavery. TasWater policies, and the standards applicable to our employees, contractors, and suppliers, are set centrally to create a common baseline for expectations and consistency across the business.

Key policies within our governance and integrity framework support ethical business practice and TasWater's commitment to human rights are below:

Modern Slavery Standard	TasWater's commitment to identify and mitigate any potential risks of modern slavery within our supply chains by incorporating and applying a range of measures into our everyday procurement and contract management practices taking a risk based approach
Procurement Standard	This policy commits TasWater to advance alignment with best practice and to include sustainability considerations in the sourcing process (including human rights)

Procurement Manual/ Procedures	These internal documents have requirements for gathering relevant details from bidders and assessing them for compliance before award	
Code of Conduct	Sets out the standards of behaviour that are expected of employees and contractors including a requirement to speak up and report behaviours that are dishonest and unethical	
Fraud and Corruption Control Policy	Includes TasWater's commitment to provide an ethical environment where honest behaviour is encouraged	
Whistleblower Policy	Provides an effective reporting and investigation framework, including a confidential whistleblower hotline	
Diversity and Inclusion Policy	TasWater's commitment to diversity and inclusion in the workplace	

We continue to regularly review and update these policies as required. Whilst TasWater already had a comprehensive set of policies and procedures to help address internationally accepted human rights, these policies have continued to be reviewed and to ensure they meet industry standards as they relate to modern slavery risk.

Due Diligence as part of sourcing

Sustainable and contemporary procurement practices are established to assist in identifying supplier relationships to assist in identifying supplier relationships that expose TasWater to modern slavery. Considerations of a range of modern slavery factors form part of our business process at each stage of sourcing. This includes the requirement for potential suppliers to complete a self-assessment questionnaire, which TasWater uses to assess the likelihood of links to modern slavery.

Where a particular commodity or supplier is determined to be potentially higher risk for modern slavery, additional assessment and supplier engagement is carried out as a way of further understanding our risks and driving positive change through our supply chain.

Contractual clauses

We continue to include modern slavery clauses in our new supplier contracts, including for categories of goods and services classified as potentially higher risk for modern slavery (as identified through our risk assessment processes).

These clauses clearly set out our expectations for the supplier to use all reasonable endeavours to prevent and respond to modern slavery in its own supply chain and activities. We understand that continued engagement with our suppliers is important to learn more about their practices to meaningfully address their modern slavery risks.

Assessing effectiveness

Through collaboration with WSAA, TasWater has ensured that the measures being developed and implemented align with standard industry practices. Additionally, in 2024–25, an internal audit will be conducted which will include reviewing the effectiveness of TasWater's approach and actions to address modern slavery risks.



Regulatory Disclosure Matrix

The table below references where mandatory criteria are disclosed for the *Australian Modern Slavery Act 2018* (Cth).

Criterion	Mandatory Criteria	Disclosure Reference
1	Identify the report entity	7
2	Describe the reporting entity's structure, operations, and supply chain	7, 8, 9, 10, 11
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	12, 13
4	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	5, 6, 14, 15
5	Describe how the reporting entity assesses the effectiveness of these actions	6, 16
6	Describe the process of consultation with any entities the reporting entity owns or controls	NA

This statement was approved by the board of Tasmanian Water and Sewerage Corporation Pty Ltd on 29th October 2024.



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