

**Greater
Western**
Water

Modern Slavery Statement

December 2023



Acknowledgement of Country

The Greater Western Water region covers Bunurong, Wurundjeri, Wadawurrung, Djarra and Taungurung Country.

We respectfully acknowledge the Kulin Nations as the Traditional Owners of the lands and waters upon which we work, operate and rely. We acknowledge the continued cultural, social and spiritual connections that First Nations people have with Country.

We recognise and value that First Nations people have cared for and protected Country for thousands of generations. Country describes land, water, air, sky, people, animals and spirits to which First Nations people are connected.

We are committed to working in partnership with local Traditional Owners and First Nations people, to harness collective wisdom to inform the future of the water management landscape while maintaining their cultural and spiritual connections to Country.

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About this Statement

This is Greater Western Water's (GWW) second 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 2022 to 30 June 2023.

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.

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 2023 Statement apply across GWW.

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 provides drinking water, recycled water, sewerage, and trade waste services to more than 568,000 residential customers and 47,000 business customers.

Our service area covers 3,700 square kilometres, stretching from Melbourne's CBD, inner and north-western suburbs through the Melton and Sunbury growth corridors to Bacchus Marsh and Macedon Ranges. The local government areas of Brimbank, Hobsons Bay, Maribyrnong, Melton, Moonee Valley, Wyndham and Yarra are within our service area, as well as parts of the local government areas of Hume, Macedon Ranges, Melbourne and Moorabool.

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 2022–23, GWW supplied approximately 115 billion litres of drinking water, 6.4 billion litres of recycled water and collected 108 billion litres of sewage and wastewater.

Our Operations

GWW's role is to ensure customers have clean, safe drinking water and efficient wastewater services. Every time customers fill the kettle, water their garden, or take a shower, GWW teams are busy behind the scenes making sure everything is working as it should.

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



- Previously City West Water service area
- Previously Western Water service area

- TP Treatment Plant
- RWP Recycled Water Plant

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 delivered 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 are 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

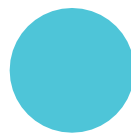
Greater Western Water annually spends \$300+ million on the procurement of services and products to aid its operations and capital works. GWW has broken its procurement spend into the following four key categories:



Construction (\$134m + Annual Spend)

Services that support GWW's capital works projects include:

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



Operations/Maintenance (\$74m + Annual Spend)

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

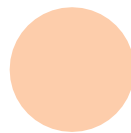
- General Maintenance
- Cleaning
- Chemical Supply
- Operational Technology
- Metering



Information Technology (\$61m + Annual Spend)

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

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



Indirects (\$34m + Annual Spend)

- Legal Services
- Consulting Services
- Recruitment
- Travel

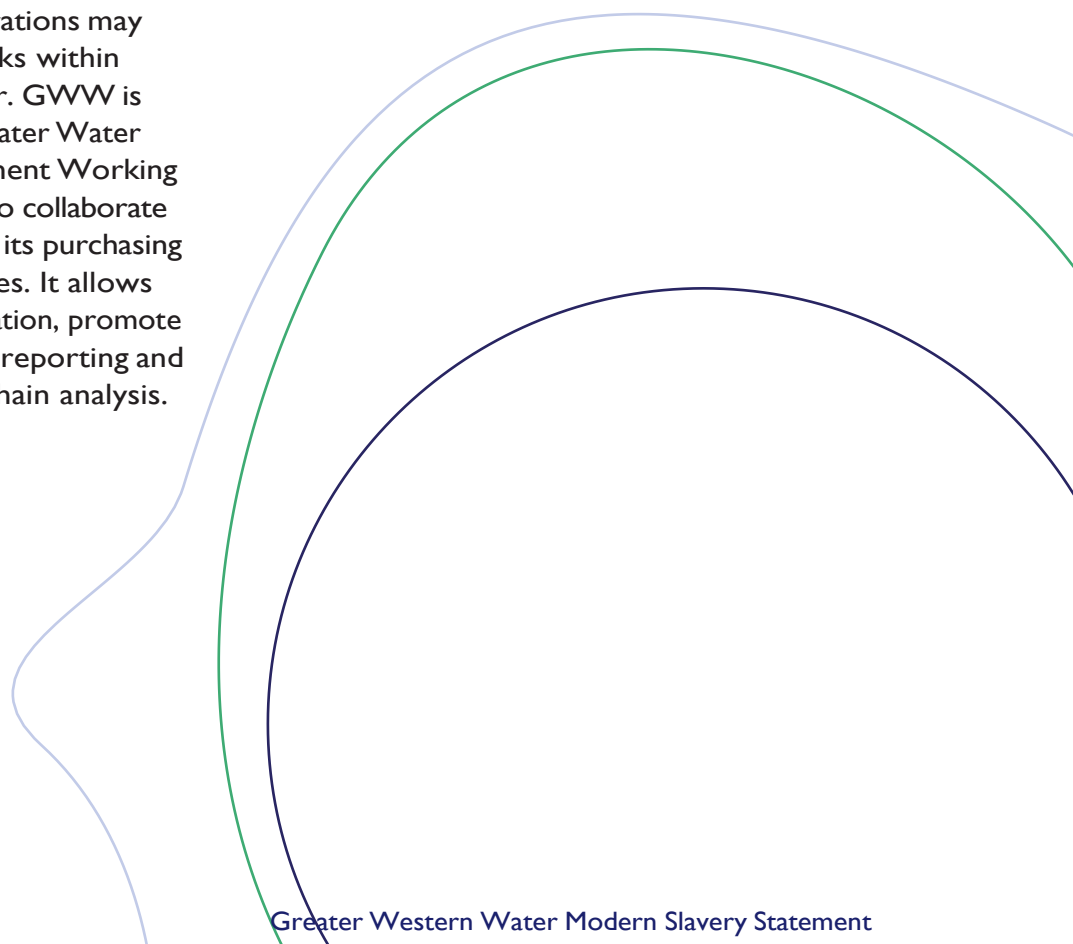
Modern Slavery Risks

GWW acknowledges that Modern Slavery risks may be present in the operations and supply chains of companies operating in the water industry including itself. 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 a rigorous governance framework and policy (including a whistleblower hotline) that outlines its commitments and entitlements available to its workforce to provide all its employees 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) which aims to collaborate across the 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 undertaken several steps to assess the potential Modern Slavery risks which included conducting a supply chain risk assessment on tier 1 suppliers in 2019 which has helped identify the hotspots where Modern Slavery risks may be more prominent. This assessment has helped prioritise areas where the association's work is focused to yield the best results.





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 were 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



Addressing and Managing our Modern Slavery Risks

As part of the Asset Delivery Organisation Review (ADOR) Program, GWW has developed an operating model and structures to support and establish a category-led procurement function. The purpose of the new model is to take a more holistic view of GWW's key spend categories. The new procurement operating model also helps us to better understand our supply chain risks inclusive of Modern Slavery risks.

As part of the category-led procurement model we have developed new procurement processes and procedures along with a new Contract Management Framework.

The intent is to raise awareness of Modern Slavery risks throughout the procurement lifecycle.

The implementation of our centre-led procurement model is a significant step up in our procurement maturity which will be supported by:

- A new and improved Procurement Policy, providing a principle-based framework to guide our procurement activities in a fair, competitive, and transparent manner.
- A new Procurement Procedures Manual, detailing the legislative frameworks that we operate in and providing guidance and advice on all aspects of procurement at GWW.
- 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.

Addressing and Managing our Modern Slavery Risks

Modern Slavery questions have been included as part of the tender returnable for procurement activities that have been conducted in the past. As part of the newly formed centre-led procurement model GWW will socialise our new Procurement Policy and Procedures Manual to those employees most exposed to procurement activities. These documents will form part of a suite of newly created artefacts that will raise the awareness of Modern Slavery risks in everyday procurement activities. Modern slavery risk assessment will be included in our procurement document suite such as evaluation templates and returnable schedules.

Further to this will be a focus on improved commercial management and supplier relationship management. Ensuring our key supply partners are also aware of their own Modern Slavery risks is a vital next step for GWW.

The key focus area in the next 12 months for GWW will be to collaborate with suppliers throughout the lifecycle of our relationship with them. As part of our rollout of supplier relationship management we'll look to conduct a pilot with selected suppliers to address all aspect of GWW Social Procurement Policy, including better understanding of their Modern Slavery supply chain risks.

As part of GWW's association with the Water Services Association of Australia (WSAA), GWW will be implementing a third-party digital platform that facilitates a Modern Slavery questionnaire with our supplier base.

The questionnaire will be initially sent to GWW's Tier I suppliers with potential modern slavery risk exposure. GWW will look to

progressively roll out the questionnaire to additional suppliers.

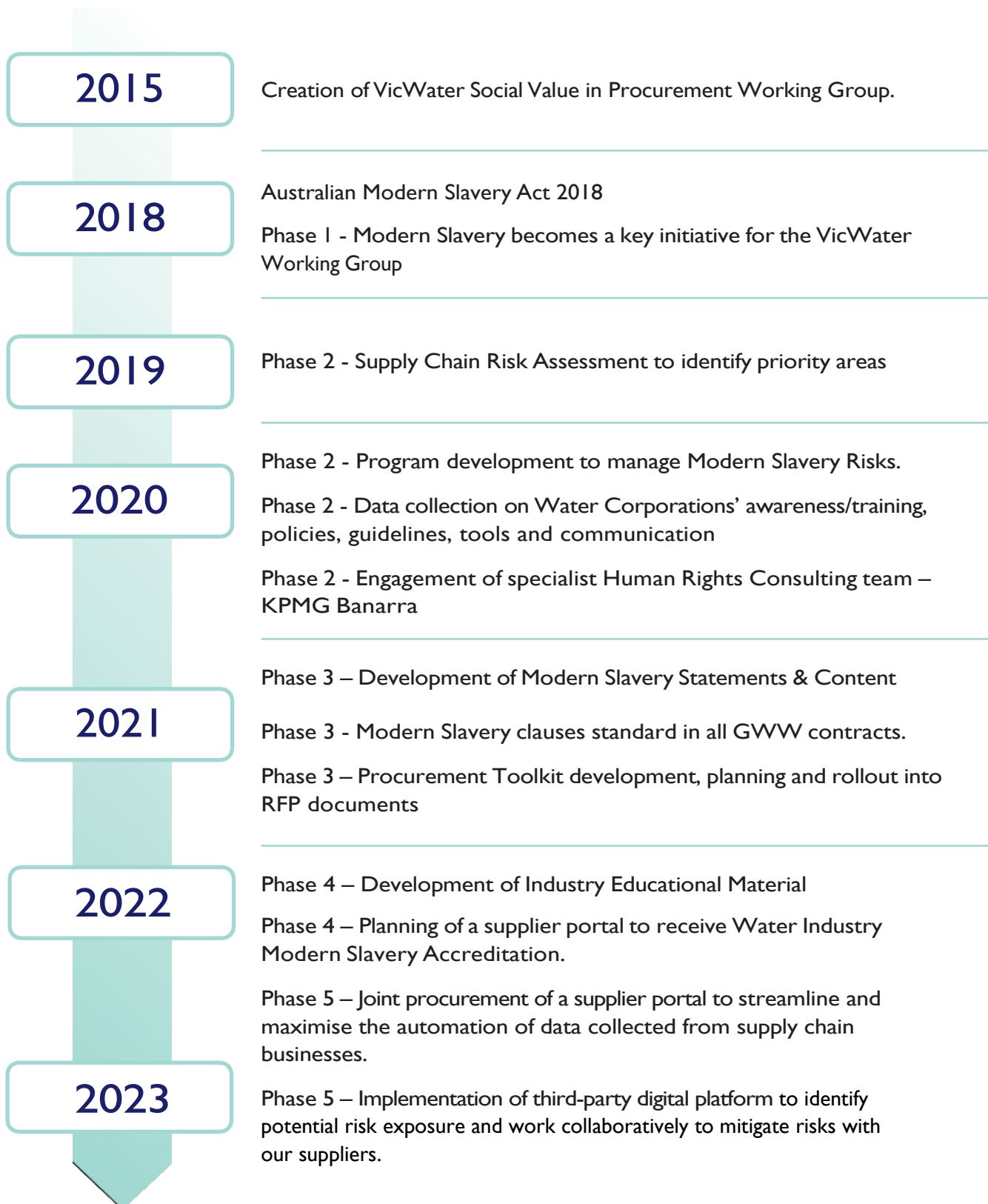
The platform will enable GWW to assess both suppliers who have already responded to the questionnaire, and new suppliers. Once completed, suppliers will only be required to update and sign off any changes annually.

Responses to the questionnaires will help GWW ascertain key data about its suppliers, the risks that each supplier is exposed to, and to flag high risks. A lack of response from suppliers will also be flagged as a high risk. The success and feedback of this phase will instruct how these tools will become an integral part of GWW's current procurement processes.

The Victorian Fair Jobs Code came into effect on 1 December 2022. This code ensures suppliers and businesses applying for GWW contracts must hold a Fair Jobs Code Pre-Assessment Certificate. This certificate allows the Victorian Government to use its purchasing power to promote secure employment and fair labour standards, and to ensure compliance with employment, workplace, and industrial laws. GWW has incorporated references to the Victorian Fair Jobs Code in our procurement documentation.

As part of GWW's process of aligning to the Victorian Government Purchasing Board (VGPB) policies, GWW publishes a 12–24-month forward procurement plan which provides an overview of what the enterprise is planning to buy at either a category and/or individual procurement level. This procurement plan will help identify which future procurement activities fall inside the identified hotspots.

Approach to Date



Modern Slavery Governance

The GWW 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 reports and presentations.

Policy

GWW adheres to the VGPB Supplier Code of Conduct. As an agency of the 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>.

The Fair Jobs Code that came into effect on 1 December 2022 can be viewed here - <https://www.buyingfor.vic.gov.au/fair-jobs-code-fact-sheet>

Remediation Process

The development of a “Grievance and Remediation Checklist” provides key considerations for GWW to manage instances where we suspect or know that a supplier is non-compliant with labour standards or modern slavery registration.

Key elements of our remediation processes are:

1. Enabling grievances to be heard including:
 - Putting in place an effective grievance mechanism; and
 - Managing a grievance.
2. Managing remediation including:
 - How to set up and communicate a remediation process; and
 - What an immediate response to an incident should look like.
3. Managing the supplier including:
 - How to communicate with the suppliers; and
 - How do develop a corrective action plan with them.

Assessment of Effectiveness

GWW will continue to monitor and assess our operations to ensure we continue to improve and progress the awareness of Modern Slavery and why it is of importance to our enterprise.

Our procurement documentation has been updated to include the assessment of modern slavery risks. These assessments will continue to be refined based on feedback from our stakeholders to ensure their ease of use and practical implementation.

GWW is part of the WSAA Modern Slavery Community of Practice. This allows GWW to share insights and improve our practices with specific reference to modern slavery in the water industry.

Consultation

Modern Slavery risk is governed by one central procurement team. This team was consulted in the preparation of this Statement to ensure that it accurately reflects modern slavery awareness, risks and actions that apply across the whole organisation and its various business units.

Board Approval

Signed By:



David Middleton (Chair)

Date: 19/12/2023





Greater Western Water

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