



Unitywater

Serving you today, investing in tomorrow.

Modern Slavery Statement

1 July 2023 – 30 June 2024

Acknowledgement of Country

Acknowledgment of Country

Unitywater acknowledges the Traditional Owners of the lands on which we operate - the Jinibara, Kabi Kabi and Turrbal people. We recognise their significant contributions to the conservation of our environment and their deep connection to the land and waters.

We pay our respects to their Elders, past and present, and acknowledge the important role all Aboriginal and Torres Strait Islander peoples continue to play within our communities.



Our Cultural Spring motif symbolises a water hole, traditionally a gathering place where knowledge is shared. The depth of colour illustrates the connection between land and water and our commitment to reconciliation, bringing our people together and fostering a deeper understanding and respect for Aboriginal and Torres Strait Islander cultures.

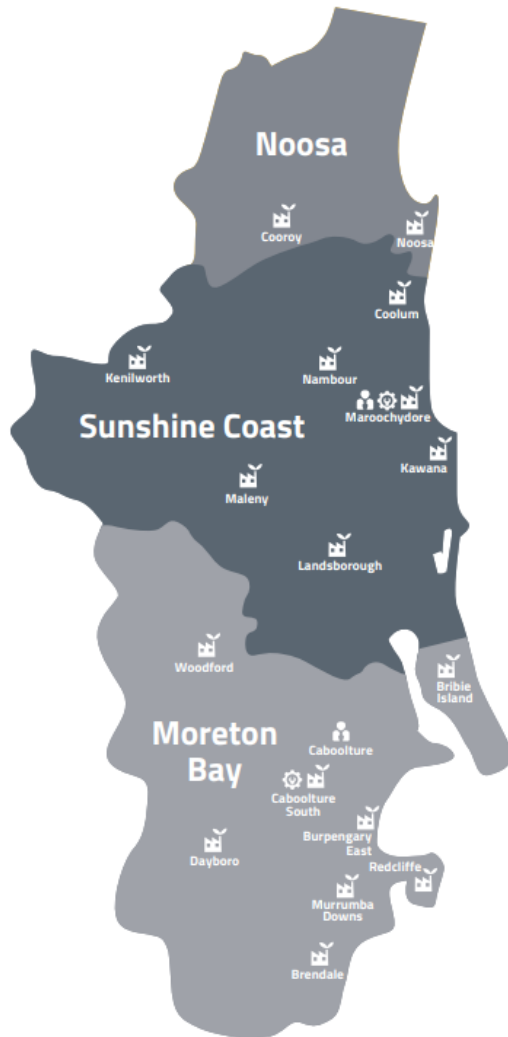
We are proud to have worked with Gilimbaa Creative Agency on this cultural artwork.




Contents

Acknowledgement of Country	i
1. Unitywater overview	3
2. Risks of modern slavery	6
3. Actions taken to address risks	8
4. Effectiveness of actions	10
5. Consultation with subsidiaries	11

1. Unitywater overview

1.1 About us



-  **Corporate Offices**
-  **Service Centres**
-  **Treatment Plants**

We operate and maintain \$4 billion worth of essential assets, for more than 800,000 customers across 5,223 square kilometers. Our service area stretches from Cooroy in the north to Samford in the south and from Bribie Island in the east to Kenilworth in the west.

Twenty-four hours a day, seven days a week, Unitywater provides customers in Moreton Bay, Sunshine Coast and Noosa with quality, safe and reliable water and wastewater services.

We take pride in providing essential services that are economically and environmentally sustainable, delivering on our purpose of fostering healthy and thriving communities.

Our modern slavery statement aligns to our core vision, values, and strategic ambition: Value Every Drop, Customer of the Future, Keep it Simple and One Unitywater.

1.2 Structure

Unitywater is a Queensland statutory authority that provides water and sewerage services to the Moreton Bay, Sunshine Coast and Noosa local government areas. It has four wholly owned subsidiaries, Headworks Australia Pty Ltd (ACN 637 942 646), Unitywater Properties Pty Ltd (ACN 616 651 042), WTCC Pty Ltd (ACN 651649633) and Unitywater Properties No. 2 Pty Ltd (ACN 651834 883).

1.3 Operations

Unitywater operates in one of the fastest growing regions of Australia, providing essential water and sewerage services to three council regions that are home to 16.4% of Queensland's population.

On behalf of the Moreton Bay, Sunshine Coast and Noosa communities we:

- Maintain and supply drinking-quality water to homes, businesses, and public areas; collect, treat and dispose of sewage.
- Produce and provide recycled water to commercial and residential customers and community groups.
- Manage trade waste from business and industrial customers.
- Build, manage, operate and maintain our sewage treatment plants, water supply infrastructure and recycled water assets.
- Provide around-the-clock response to sewerage and water emergencies.
- Manage customer and stakeholder enquiries.
- Issue and manage water and sewage accounts.

1.4 Supply chains

With the population of the Moreton Bay, Sunshine Coast, and Noosa, we serve one of the fastest growing regions in the country.

Unitywater's long-term capital works program includes an investment of \$1.8 billion over the next five years to cater for population growth, ensuring infrastructure meets strict standards for the unique and delicate environment in which Unitywater operates.

We will continue to upgrade and invest in sewerage and water supply infrastructure in ways that keep us at the forefront of environmental practices and meet the challenges of flood risk, population growth and climate change.

Unitywater had 1148 suppliers in 2023-2024 who helped to ensure goods and services were provided for approximately:

- 6194km sewerage mains
- 802 sewage pump stations
- 17 sewage treatment plants
- 357,092 water connections
- 6407km water mains
- 72 water pump stations
- 103 water reservoirs
- 12 schemes supplying recycled water

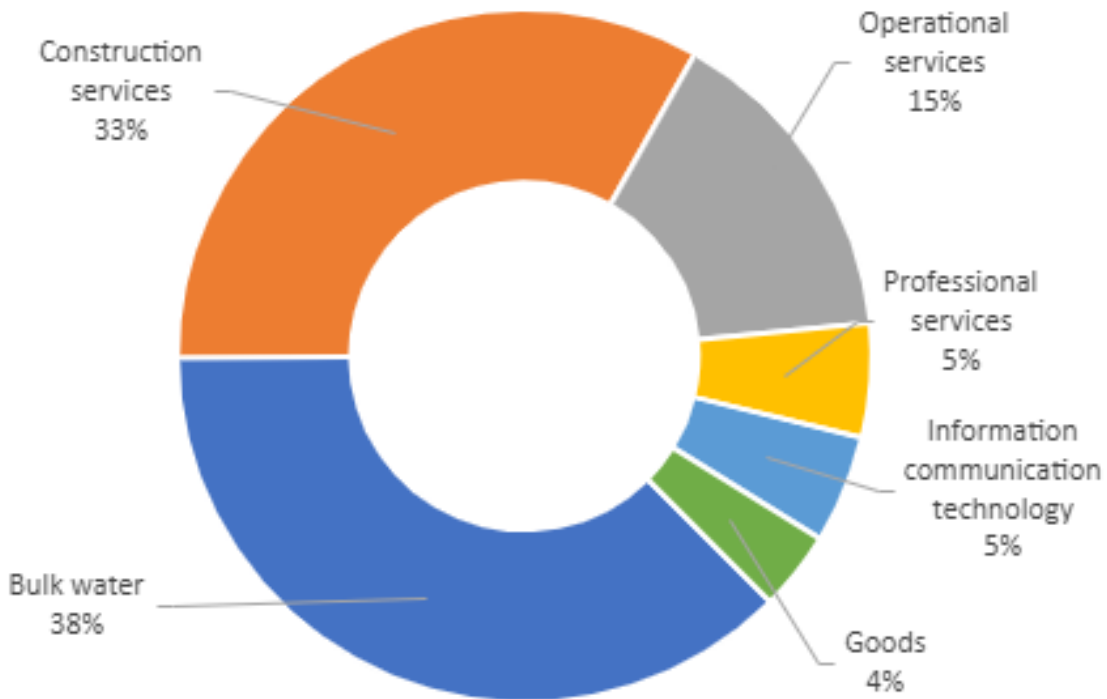
Over the course of the 2023-24 financial year Unitywater spent \$762M (inclusive of GST) on goods and services to provide water and sewerage services to the Moreton Bay, Sunshine Coast and Noosa regions.

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

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

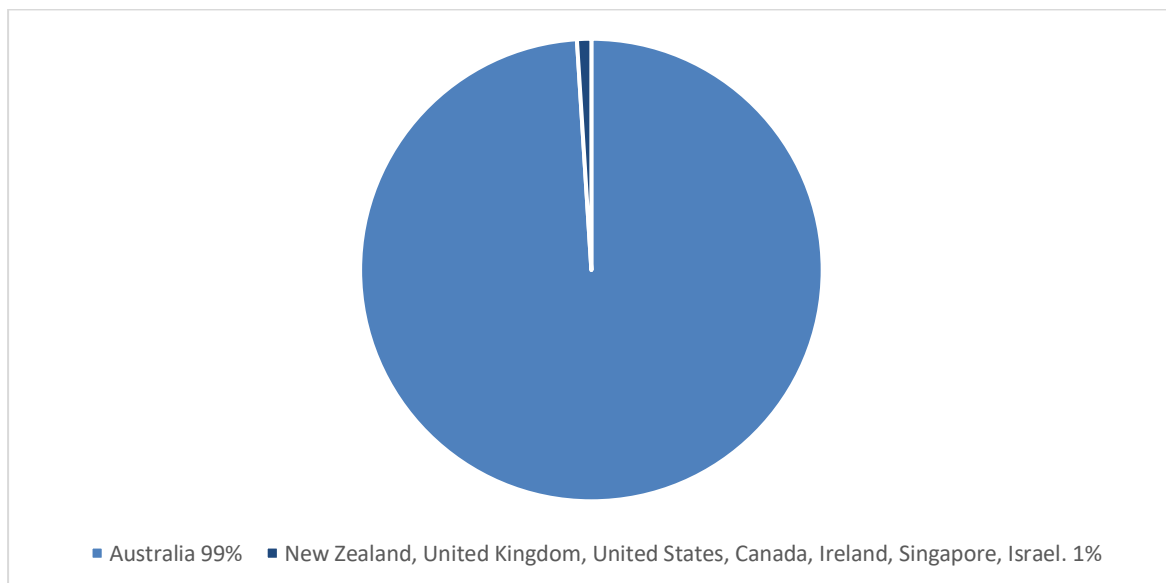
Key areas of spend are indicated below:

Key areas of spend



99% of direct suppliers are based in Australia as indicated below.

Spend by country



*Some suppliers are Australian subsidiaries of overseas suppliers.

2. Risks of modern slavery

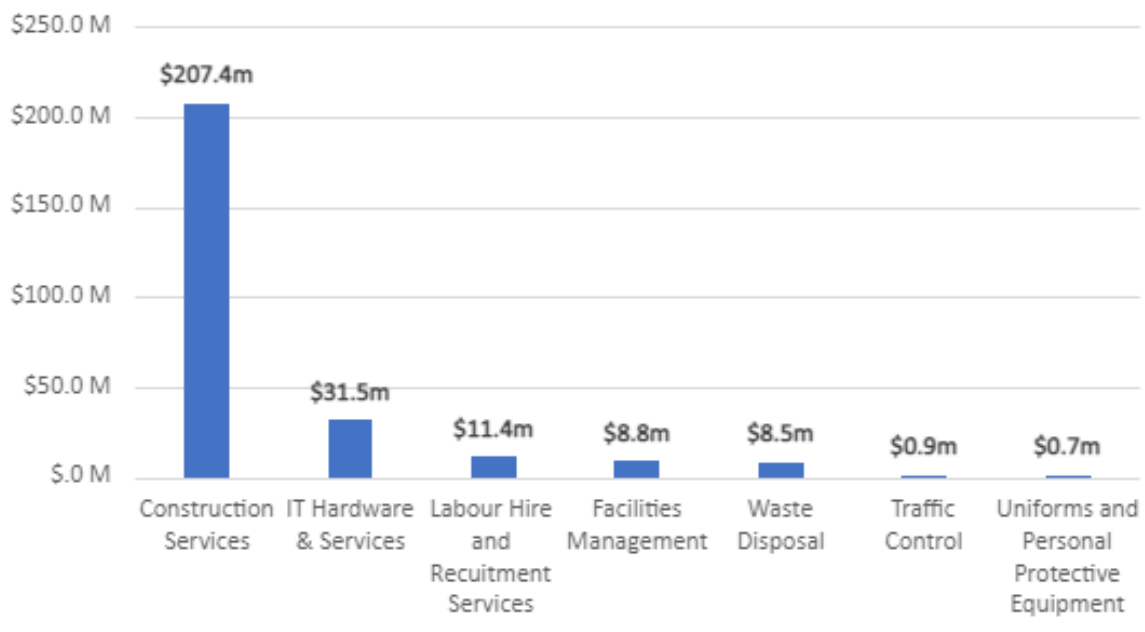
2.1 Supply chain risks

Based on the Global Slavery Index for products that present a high risk for import into Australia and industries where there may be migrant workers, we have reviewed direct suppliers and identified the following industries as those with a high risk of modern slavery:

- Construction services
- IT hardware and services
- Labour hire and recruitment services
- Facilities management services, including cleaning and security services
- Waste disposal
- Traffic control
- Uniforms and Personal Protective Equipment

Spend in high-risk industries during the reporting period are listed below:

Spend in high-risk industries



2.2 Operations risks

Unitywater recognises its responsibility to ensure its employees are paid appropriate and fair remuneration; can access all leave and employment conditions they are legally entitled to; are dealt with fairly and given natural justice in any dispute, especially trainees and apprentices; and there is no exploitation of children in the workplace.

Our modern slavery risks and their controls are summarised in the table below. These risks are actively managed through Unitywater’s risk management framework.

Modern slavery risks

Risk event	Mitigating Processes
Unitywater’s suppliers engage in modern slavery.	<ol style="list-style-type: none"> 1. Due diligence processes applied to supplier selection. 2. Contract templates updated to clearly articulate reporting and anti-modern slavery obligations. 3. Sourcing procedure includes a process on how to assess modern slavery risks. 4. Response protocol implemented for employees and the community to report suspected instances of modern slavery. 5. Continue to develop an understanding of potential for exposure to modern slavery in supply chains. 6. Continue to train and raise awareness of modern slavery for specific Unitywater roles to help them identify and mitigate modern slavery risks. 7. Continue to regularly survey high risk suppliers on their compliance with modern slavery obligations.
Recruitment practices breach modern slavery requirements.	<ol style="list-style-type: none"> 1. Employment contracts reviewed against human rights and modern slavery acts. 2. Continue to ensure recruitment procedures include validation of applicants’ right to work and age. 3. Continue to ensure roles are assessed against award standards to ensure at least minimum remuneration is paid, if not better.
Obligations towards employees are not adequately protected or addressed.	<ol style="list-style-type: none"> 1. Employment contracts reviewed against human rights and modern slavery acts. 2. Audit fatigue management systems, processes, procedures. 3. Adequate systems of communication are available whereby employees can raise any concerns they have with Unitywater not fulfilling its obligations in a way that is transparent, fair, and meaningful.

3. Actions taken to address risks

3.1 Supply due diligence

It is imperative that we only do business with ethical suppliers. An ethical supplier is one that offers quality jobs, provides a safe workplace, invests in training workers, demonstrates respect for workers, considers the environment and contributes to positive social outcomes for the communities in which the supplier operates.

3.1.1 Collaboration with others

We are working closely with the Water Services Association of Australia (WSAA) and other water utilities and have developed an industry approach to Modern Slavery where we collaborate to collect data that is common to Unitywater supply chains, shared suppliers, and areas of activity that may represent increased risks of harm to people. The goal is to collaborate on projects and initiatives around how we assess and address modern slavery risks, as well as opportunities for collective continuous improvement around modern slavery reporting.

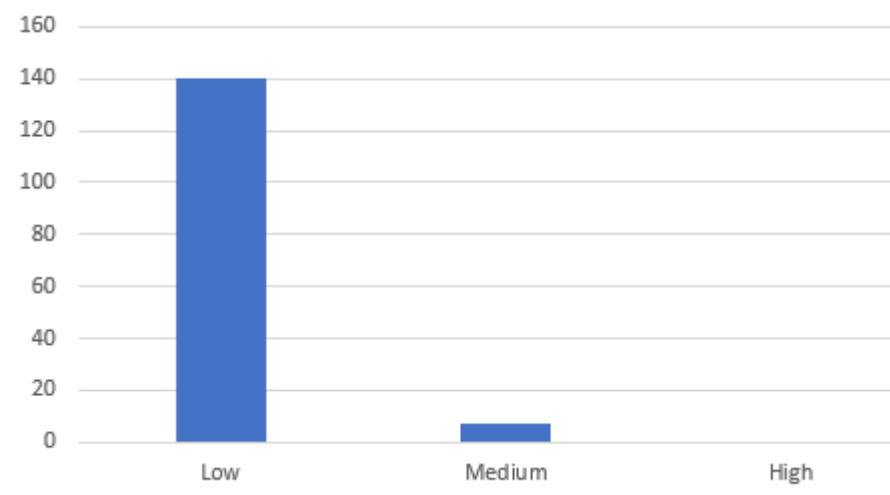
We collaborate with Queensland State Government Departments and Southeast Queensland utilities as part of the Queensland State Government Modern Slavery community of practice. The community of practice shares information, insights, and issues to improve the knowledge of the group.

3.1.2 Supplier Assessment Questionnaires (SAQs)

Direct suppliers to Unitywater complete questionnaires that guide them through a self-assessment of the modern slavery risks in their operations and supply chains and provide links to online educational resources to support continuous improvement. Suppliers' responses assist in assessing and addressing modern slavery risks across individual suppliers, understanding the trends and patterns across sectors and supply chains, and track the effectiveness of actions over time.

In FY23-24 we invited 311 direct suppliers to complete a non-mandatory SAQ based on high spend and high-risk industries, of whom 147 (47%) completed the assessment.

There were 140 scored as low risk and 7 were a medium risk. There were no high-risk responses.



We completed a further review of the SAQs responses that have a medium or high survey risk, or where there is an indication of a non-conformant response, we seek clarification from a supplier if required. The categories of questions we focus on include:

- If the supplier has policies and procedures in place that cover modern slavery.
- What is their understanding and visibility of their supply chain.
- If they are sourcing from high-risk countries.
- If they have had any instances of modern slavery in their supply chains.
- If they recruit from overseas and clarification on their human resource practices.

Suppliers who have been invited to complete the SAQ are direct suppliers (known as Tier 1 of our supply chain). We are continuing to work with WSAA and Informed 365 to assess deeper into the supply chain to survey Unitywater supplier's suppliers (Tier 2 and beyond).

We will also continue to embed the platform and work with suppliers to increase the response rate to the SAQ to enhance visibility of our supply chain.

3.1.3 Procurement processes and awareness training

We have introduced a due diligence check prior to awarding new contracts to suppliers, where a shortlisted supplier needs to have completed a modern slavery assessment through the online platform. We are continuing to investigate ways to enhance the onboarding process of suppliers to ensure all suppliers engaged are screened for modern slavery risks.

The tender templates and Procurement Guide have been updated to reflect Unitywater's commitment to procuring from ethical suppliers. It provides Unitywater team members with information on what constitutes modern slavery and outlines the application to the sourcing process.

Purchasing contracts have been updated to include obligations for suppliers to assess, control and notify us of actual or potential instances of modern slavery.

A modern slavery training program was issued to all leaders across the organisation, including team members from Procurement, Wellbeing and Continuous Improvement, Human Resources Business Partnering and Recruitment. The training addressed acceptable working conditions and the risks pertaining to modern slavery. Refresher training for applicable team members is provided every two years. The modern slavery training module forms part of the onboarding process for new team members, based on their role.

We continue to focus on providing training to the procurement team on how to screen suppliers for modern slavery risks throughout the procurement lifecycle and collaborate with those suppliers if risks are identified.

We have implemented a modern slavery response protocol so that employees or the community know how to report if they became informed of or identify that a supplier is engaging in modern slavery.

3.1.4 Operations due diligence

For the reporting period, all employees are based in Australia with most being employed directly on a permanent basis. As a result, the risk in operations for modern slavery is low.

The breakdown of workforce for the reporting period is provided below:

Full Time Equivalent Employees	Full Time Equivalent Contractors	Total
807 (95%)	35 (5%)	852

Unitywater respects ethical labour practices and values and promotes diversity. Consistent with these principles, we have a zero-tolerance approach to any form of modern slavery in our operations, whether it be servitude, forced labour, debt bondage, human trafficking, or any other recognised form of slavery. We recognise our responsibility to:

- Represent Unitywater accurately.
- Accurately describe the type of work and work conditions.
- Ensure that employees are given work they are lawfully able to do.
- Ensure that employees are not harmed or exploited in connection with employment.
- Provide fair remuneration.
- Provide a safe and appropriate work environment and work conditions.

The Unitywater recruitment policy helps to ensure all recruitment decisions are consistent with Unitywater values. The recruitment process is applied consistently and fairly, and we act in accordance with the principles in the policy. We have a formal recruitment process for both permanent and contingent workforce which is adhered to. When external recruitment agencies are engaged to act on Unitywater's behalf, they are required to follow these recruitment processes. It is imperative that our recruitment team and hiring leaders identify and support diverse candidates throughout the recruitment process so that we can build a more diverse and inclusive workplace.

The online recruitment management system includes verification points to ensure policies and procedures are correctly followed. For example, a candidate is required to verify their identity and confirm their right-to-work status. Using the information provided, contracts are prepared that comply with relevant legislation and Unitywater policies and procedures.

To mitigate the risk of modern slavery, we use a range of engagement methods to source applicants depending on the needs of the business. In all cases individuals can apply for work, decline an offer, or otherwise opt out of the process at any time.

Each position, whether advertised internally or externally, is assessed to ensure there is no misleading information and to establish that it is a genuine vacancy that can be filled. A position description is prepared and provided to candidates on request.

Candidates are provided with a written contract of employment prior to their commencement that confirms the terms and conditions of employment including position title, salary information, work location, conditions, and entitlements.

We have comprehensive policies, procedures, and systems in place to ensure that employees are paid accurately and on time, in accordance with their contractual entitlements and that leave entitlements are granted consistently and in line with the requirements of the Australian Government *Fair Work Act 2009*.

We conduct an annual reconciliation to assess and address the potential risk of underpayment and failure to correctly calculate leave accruals.

We review total compensation annually to ensure employees are paid appropriately at or above the applicable industrial instrument. In the event of any shortfall, this is corrected each year as part of the annual reconciliation process.

4. Effectiveness of actions

We utilise a compliance system developed by a global content provider to monitor and assess modern slavery legislative obligations. Management have been delegated responsibility for maintaining and periodically reviewing modern slavery obligations as they apply to their business units. If a potential non-compliance occurs, it is reported, assessed,

investigated, and monitored through a tailored software system. Trends and material non-compliances are reported to the Audit and Risk Committee quarterly.

We have a robust risk management framework which enables the organisation to respond to risk in an active and live manner. Critical to the effectiveness of this framework is the use of a database that allows for live tracking of risks and the actions assigned to each. The risks identified in this document have been incorporated into the database and both actions and controls are assessed for effectiveness as part of periodic reviews.

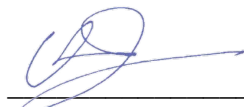
We have Code of Conduct documents for both employees and suppliers including contractors, with the Code incorporating clear expectations around identifying and eliminating modern slavery. Training on the updated Code has been rolled out to the business to supplement the existing modern slavery training modules.

5. Consultation with subsidiaries

During the reporting period this statement covers Unitywater consultation with key personnel of its subsidiary companies (Company Secretary and Directors) about the preparation of this statement and ensured they had an opportunity to contribute to its content.

In the event those subsidiaries contract with Third Parties, Unitywater ensures they are aware of the obligation to appropriately identify, assess and address modern slavery risks. The entities are required to comply with the Modern Slavery policies and guidelines set by Unitywater.

This statement was approved by the Unitywater Board on 29/10/2024 and signed with their authority by Anna Jackson in her role as CEO of Unitywater.



Anna Jackson

CEO, Unitywater on 14/09/2024

unitywater.com

1300 086 489

Emergencies and Faults 24 hours
Customer Service: 8am – 5pm,
Mon – Fri (except public holidays)

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Customer Service Counters 8:30am – 4.30pm,
Mon – Fri (except public holidays)
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Unitywater has certification to
OH&S ISO 45001:2015 Reg No 500000079
Quality ISO 9001:2015 Reg No 500000079
Food Safety ISO 22000:2018 Reg No 500000079