



# Modern Slavery Statement

1 July 2024 – 30 June 2025

## Acknowledgement of Country

Unitywater respectfully acknowledges the Traditional Custodians of the lands and waterways in which we live, work, and operate, the Kabi Kabi, Jinibara and Turrbal peoples.

We honour their enduring connection to these places and their deep cultural, spiritual, and environmental knowledge and stewardship over the waterways that sustain us all.

We pay our deepest respects to Elders past and present, who hold the wisdom, traditions and stories of their people.

We are dedicated to truth-telling, promoting reconciliation and inclusion, ensuring that the voices and perspectives of First Nations peoples are heard and valued.

We commit to integrating Indigenous knowledge into our work to protect and sustain our precious water resources.

Together, as One Unitywater, we strive for a harmonious and inclusive community, united in respect, understanding and shared stewardship of our environment.



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.

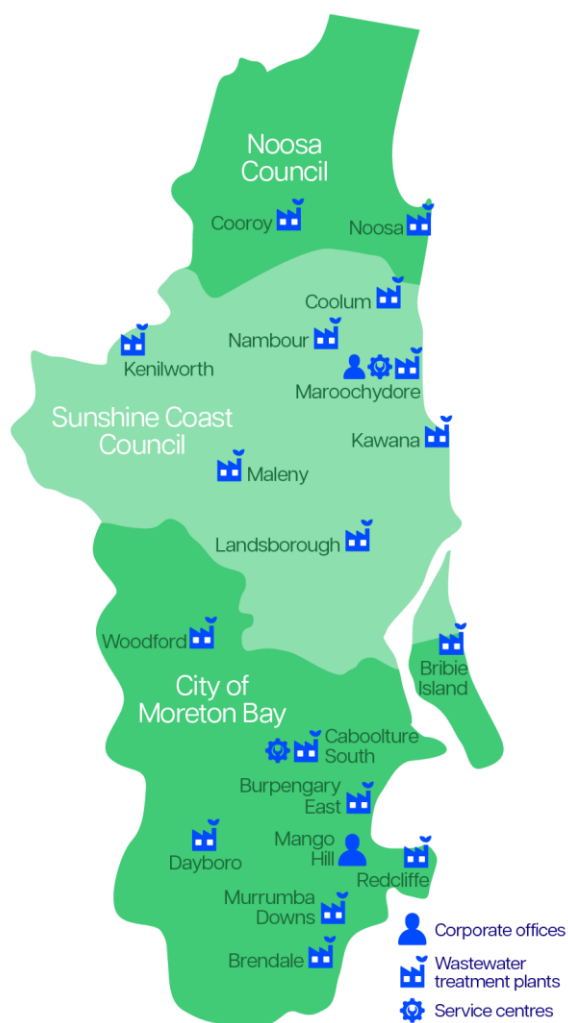
We are proud to have worked with Gilimbbaa Creative Agency on this cultural artwork.

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## 1. Unitywater overview

### 1.1 About us



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 651 649 633) and Unitywater Properties No. 2 Pty Ltd (ACN 651 834 883).

### 1.3 Operations

Unitywater operates in one of the fastest growing regions of Australia, providing essential water and sewerage services to three council regions. We operate and maintain \$4.3B worth of essential assets, for more than 900,000 customers across 6,987 square kilometers. The communities we service stretch from Cooroy in the north to Samford in the south and from Bribie Island in the east to Kenilworth in the west.

On behalf of the communities we serve, we:

- Maintain and supply drinking-quality water to homes, businesses, and public areas; collect, treat and dispose of wastewater
- 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 wastewater 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

Supplying the population of 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 \$2B 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 1078 suppliers in 2024-25 who helped to ensure goods and services were provided for approximately:

- 6,256km sewerage mains
- 803 sewage pump stations
- 17 wastewater treatment plants
- 363,809 water connections
- 6,475km water mains
- 74 water pump stations
- 103 water reservoirs
- 13 schemes supplying recycled water.

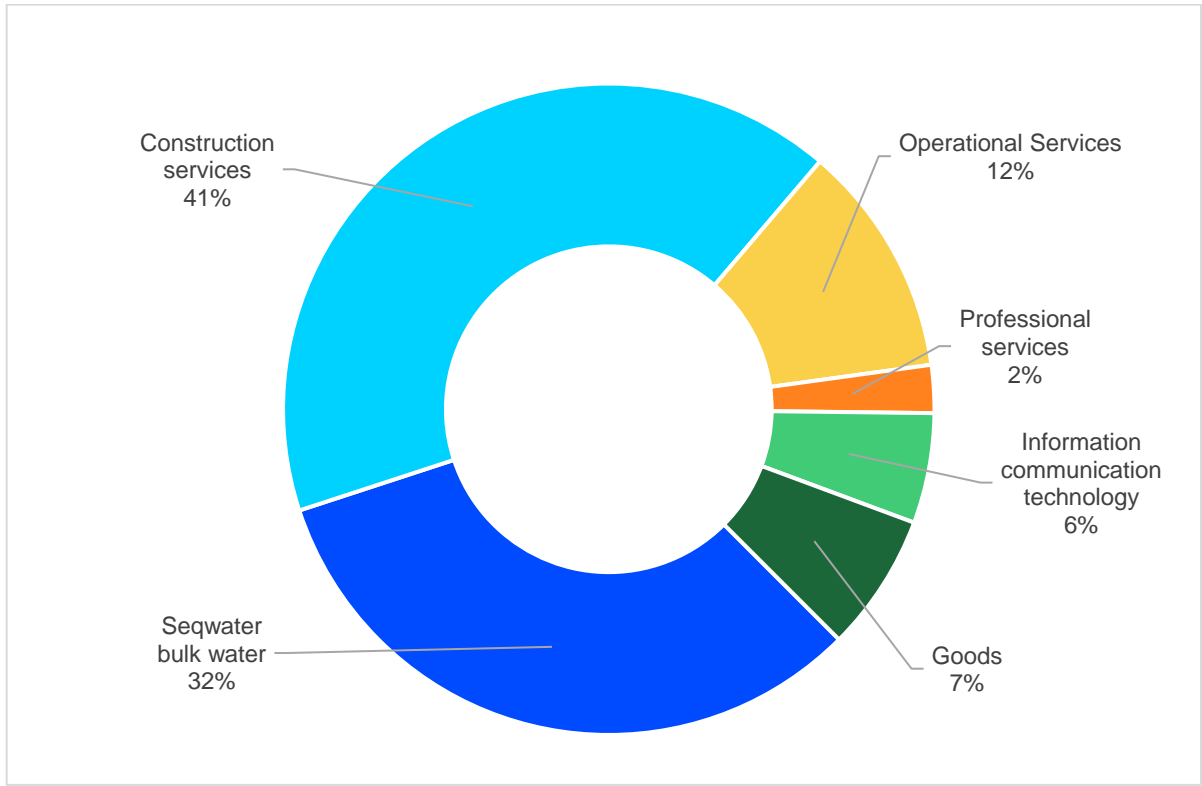
Over the course of 2024-25, excluding wages, Unitywater spent \$866M (inclusive of GST) on goods and services to provide water and sewerage services to our regions.

Procured goods included Seqwater bulk 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.

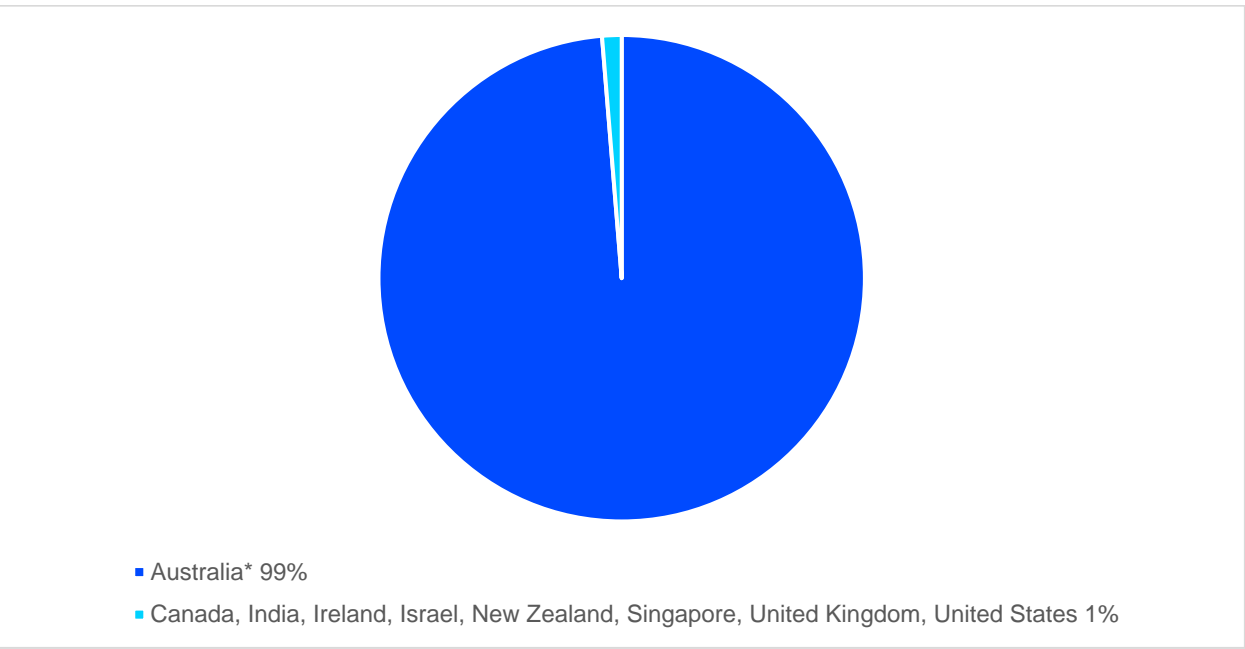
Key areas of spend are indicated below:

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

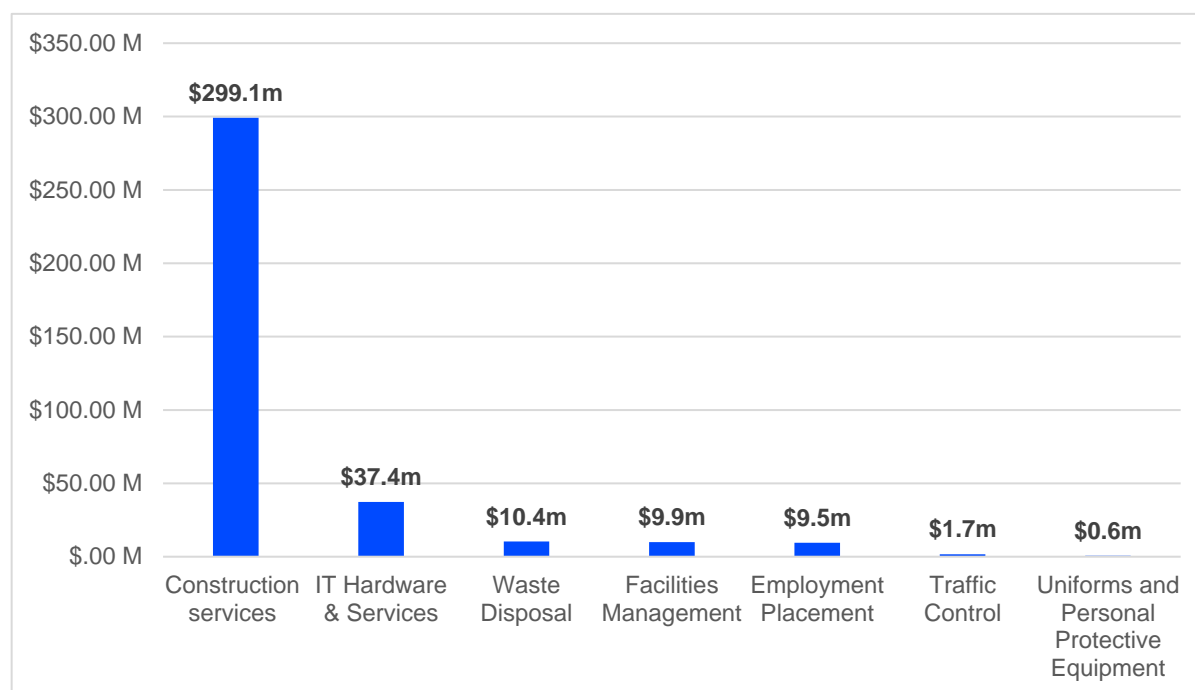
### 2.1 Supply chain risks

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, Unitywater 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 our risk management framework.

## Modern slavery risks

Risk event	Mitigating Processes
<b>Unitywater's suppliers engage in modern slavery.</b>	<ul style="list-style-type: none"> <li>• Due diligence processes applied to supplier selection.</li> <li>• Contract templates clearly articulate reporting and anti-modern slavery obligations.</li> <li>• Sourcing procedure includes a process on how to assess modern slavery risks.</li> <li>• Response protocol implemented for employees and the community to report suspected instances of modern slavery.</li> <li>• Continue to develop an understanding of potential for exposure to modern slavery in supply chains.</li> <li>• Continue to educate and raise awareness of modern slavery for specific Unitywater roles to help them identify and mitigate modern slavery risks.</li> <li>• Continue to regularly survey suppliers on their compliance with modern slavery obligations and provide educational resources to suppliers to increase their awareness of modern slavery.</li> </ul>
<b>Recruitment practices breach modern slavery requirements.</b>	<ul style="list-style-type: none"> <li>• Employment contracts reviewed against human rights and modern slavery acts.</li> <li>• Continue to ensure recruitment procedures include validation of applicants' right to work and age.</li> <li>• Continue to ensure roles are assessed against award standards to ensure at least minimum remuneration is paid, if not better.</li> </ul>
<b>Obligations towards employees are not adequately protected or addressed.</b>	<ul style="list-style-type: none"> <li>• Employment contracts reviewed against human rights and modern slavery acts.</li> <li>• Audits conducted on fatigue management processes and procedures.</li> <li>• 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.</li> </ul>

## 3. Actions taken to address risks

### 3.1 Supply due diligence

Unitywater wants to do business with ethical suppliers who offer 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), Informed 365 and water utilities from around Australia, as part of a water consortium to develop an industry approach to modern slavery. Consortium members collaborate to collect data that is common to our 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.

Topics of collaboration include improvement opportunities with the WSAA / Informed 365 survey question set, improvements to the platform and supplier engagement and education. There is also increased knowledge for consortium members with guest speakers and subject matter experts attending meetings to share insights on human rights and modern slavery topics and supply chain due diligence.

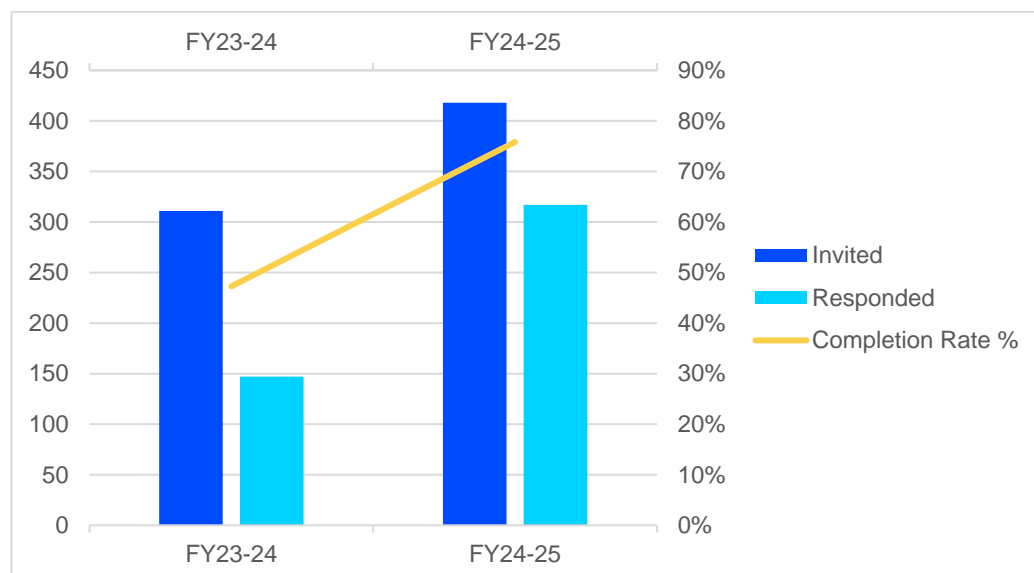
We also collaborate with Queensland State Government Departments and Southeast Queensland utilities as part of the Queensland State Government Modern Slavery community of practice. The community of practice shares information, insights, and issues to improve the knowledge of the group.

### 3.1.2 Supplier Assessment Questionnaires (SAQ)

Direct suppliers to Unitywater are requested to complete a non-mandatory questionnaire that guides them through a self-assessment of modern slavery risks in their operations and supply chains and provides 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.

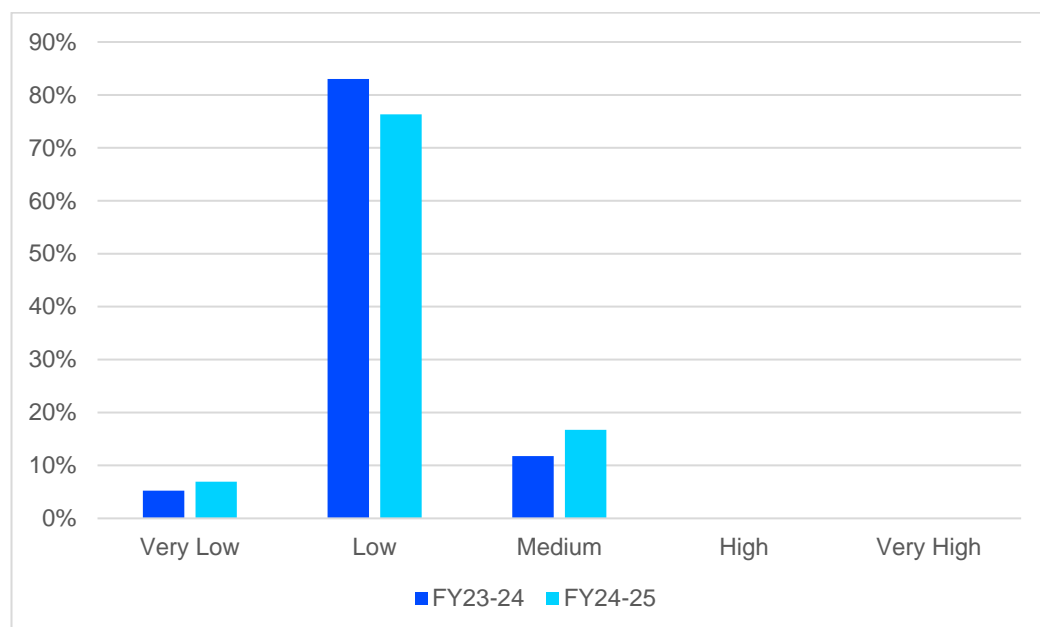
We have introduced a due diligence check prior to awarding new contracts to suppliers where a shortlisted supplier is requested to complete a SAQ. Suppliers will be requested to update their SAQ responses every two years.

We invited 418 direct suppliers to complete a SAQ based on annual spend over \$100k and any suppliers in high-risk industries, of whom 317 (76%) completed the assessment. The response rate increased by 29% compared to the last reporting period as indicated in the graph below. The increase is due to a continued focus on engaging with suppliers to respond to the SAQ and the embedding of the supplier due diligence process.



In this reporting period the supplier risk responses were 22 very low, 242 low and 53 medium-risk. There were no high or very high-risk responses.

The table below indicates the percentage of responses in each risk category over the past two reporting periods. The increase in medium risk responses is due to the increase in supplier responses.



This statement uses the WSAA / Informed 365 survey five tier risk rating as provided by Bureau Veritas which integrates indices such as the Corruption Perceptions Index (CPI), Social Progress Index (CPI), Global Peace Index (GPI), and Global Slavery Index (GSI). This approach assesses not only direct risks associated with modern slavery but also broader societal risks that can impact industry standards and business practices.

The Unitywater five tier risk ratings have been mapped to the WSAA / Informed 365 risk ratings in the table below. Based on the WSAA / Informed 365 supplier survey response risk assessments ranging from very low to medium, the equivalent Unitywater's modern slavery risk ranges from minor to moderate.

Unitywater Risk Rating	Informed 365 Risk Ratings
Minor	Very Low and Low
Moderate	Medium
Serious	High
Major	Very High
Critical	Very High

A further review of the SAQ responses is undertaken that have a medium, high or very high risk, or where there is an indication of a non-conforming response. Clarification is sought from each supplier where required. Unitywater provides support and guidance on how they can improve their controls. The categories of questions we focus on include:

- Does the supplier have policies and procedures in place that cover modern slavery?

- What are the suppliers understanding and visibility of their supply chain, and if suppliers are sourcing from high-risk countries?
- Have suppliers had any instances of modern slavery in their supply chains?
- Do suppliers recruit from overseas and confirmation on their human resource practices?

Suppliers who have been invited to complete the SAQ are direct suppliers (known as tier one 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 two and beyond).

We will continue to embed the platform and work with suppliers to increase the response rate to the SAQ to enhance visibility of our supply chain. We are also continuing to investigate ways to enhance the onboarding process of new suppliers to ensure they are screened for modern slavery risks prior to being engaged.

### 3.1.3 Procurement processes and awareness training

Our Procurement Guide has 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.

Our purchasing templates have been updated to include obligations for suppliers to assess, control and notify us of actual or potential instances of modern slavery. Across Unitywater's active contracts, 96% contain modern slavery clauses. The remaining 4% of contracts which have a low likelihood of modern slavery are due for update in 2026.

A modern slavery training program was issued to all leaders across the organisation, including team members from Procurement, Technology and Digital Solutions, Wellbeing and Continuous Improvement, Human Resources 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. The protocol is available on Unitywater's website and intranet.

### 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:

Permanent Full Time Equivalent Average	Casual and Temporary Full Time Equivalent Average	Contractors Full Time Equivalent Average	Total
781 (91%)	36 (4%)	43 (5%)	860

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 our 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 *Fair Work Act 2009* (Cth).

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

The Informed 365 platform allows Unitywater to track supplier engagement, SAQ completion rates and survey risk ratings over time. The supplier assessment also provides suppliers with access to free modern slavery learning resources which are embedded within the questionnaire allowing suppliers to access resources for more information which will increase their awareness. There are now 20 resources available within the supplier assessment which were accessed 314 times by suppliers across the consortium platform during the reporting period.

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.

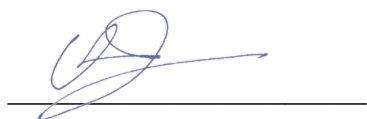
We have Code of Conduct documents for both employees and suppliers including contractors, with the Code incorporating clear expectations around identifying and eliminating modern slavery. Training on the updated Code has been rolled out to the business to supplement the existing modern slavery training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

## 5. Consultation with subsidiaries

This statement covers Unitywater consultation with key personnel of its subsidiary companies (Company Secretary and Directors) about the preparation of this statement for the 2024-25 period, 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 28/10/2025 and signed with their authority by Anna Jackson in her role as CEO of Unitywater.*



Anna Jackson

CEO, Unitywater on 19/11/2025