Unitywater

Modern Slavery Statement

1 July 2025 – 30 June 2026

unitywater.com

1. Acknowledgement of Country

At Unitywater, we respectfully acknowledge the Traditional Custodians of the lands and waters on which we live, work, and operate, the Kabi Kabi, Jinibara and Turrbal Peoples. We honour the rich cultural heritage, deep spiritual connection, and enduring relationship that Aboriginal and Torres Strait Islander Peoples have with their Country, particularly their profound knowledge of 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 recognise that the waterways we rely on today have been cared for by First Nations Peoples for tens of thousands of years, and we acknowledge the impacts of colonisation, which have disrupted ancient and sustainable practices.

We are dedicated to promoting reconciliation and inclusion, ensuring that the voices and perspectives of First Nations Peoples are heard and valued. We strive to integrate Indigenous knowledges and practices into our operations, recognising their crucial role in protecting and sustaining our precious water resources.

Together, as one Unitywater, we will work towards building a harmonious and inclusive community, united in respect and understanding. We are committed to fostering respectful and collaborative relationships, and to learning from and working with Aboriginal and Torres Strait Islander Peoples to create a sustainable future for all.

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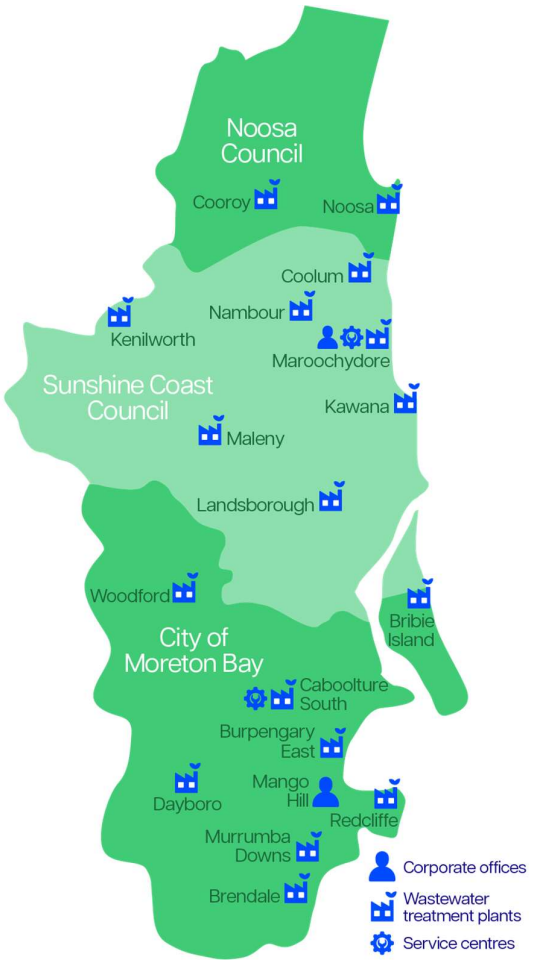
1. Unitywater overview

1.1 About us



Twenty-four hours a day, seven days a week, Unitywater provides customers in Moreton Bay, Sunshine Coast and Noosa with safe, reliable and sustainable 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 Strategic Ambition and its four pillars:

- Value every drop.
- Customer of the future.
- Keep it simple.
- One Unitywater.

1.2 Structure

Unitywater operates in one of Australia's most exceptional environments in terms of natural beauty, geographical and demographic breadth. Unitywater is a statutory authority, formed under the *South-East Queensland Water (Distribution and Retail Restructuring) Act 2009* (Qld). Governed by an independent, skills-based Board, we have a Participation Agreement with our shareholders – City of Moreton Bay, Noosa Council and Sunshine Coast Council. 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 wastewater services to three council regions. We operate and maintain $4.7 billion water, wastewater and recycled water assets to reliably provide the essential services valued by customers of today, while delivering a $2B water and wastewater infrastructure capital program over the next five years to support the fastest growing region in Australia.

On behalf of the communities we service, 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 wastewater and water emergencies.
- Manage customer and stakeholder enquiries.
- Issue and manage water and wastewater accounts.

1.4 Supply chains

Unitywater had 1,167 suppliers in FY2025-26 who helped to ensure goods and services were provided for approximately:

- 6,357km sewerage mains.
- 802 sewage pump stations.
- 17 wastewater treatment plants.
- 370,778 water connections.
- 6,553km water mains.
- 74 water pump stations.
- 103 water reservoirs.
- 13 schemes supplying recycled water.

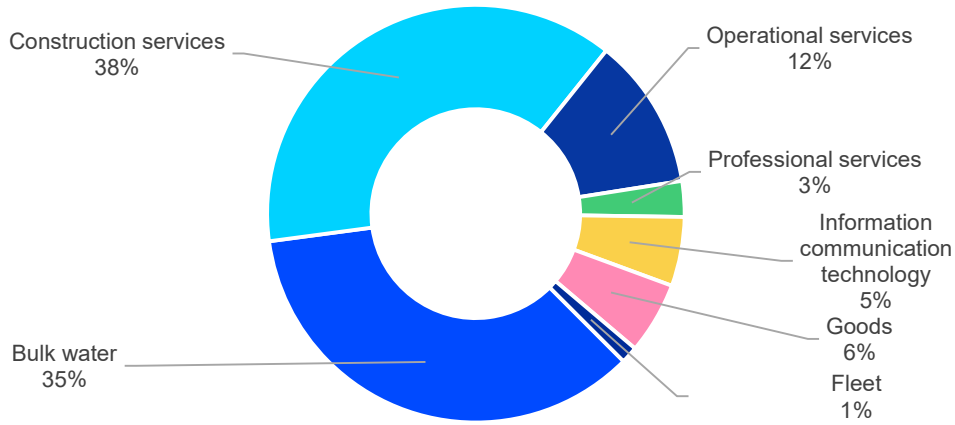
Over the course of FY2025-26, excluding wages, Unitywater spent $868M (inclusive of GST) on goods and services to provide water and wastewater services to our regions.

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.

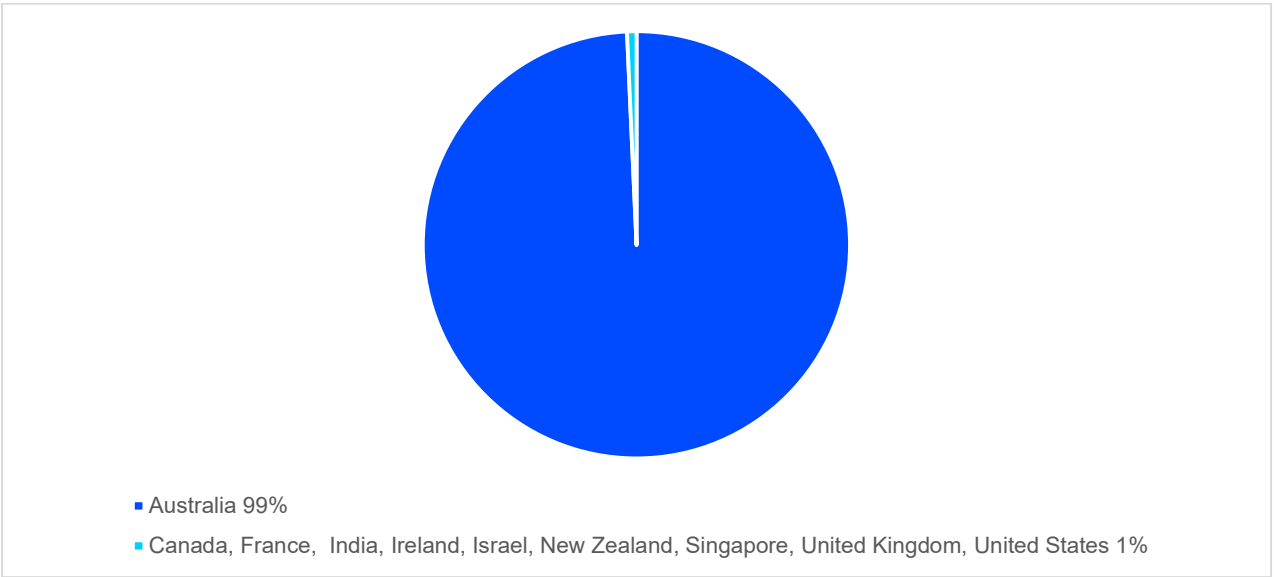
Key areas of spend are indicated below:

Key areas of spend



Spend by country shows 99% of direct suppliers are based in Australia as indicated below:

Spend by country



*Some suppliers are Australian subsidiaries of overseas suppliers.

The 1% of spend with overseas suppliers is listed in the table below, which provides the country and category of spend and the associated risk ratings provided by Bureau Veritas.

The majority of overseas suppliers were assessed as having a low inherent risk, reflecting the combination of lower risk countries and categories. However, two suppliers in India and one supplier in Israel providing software and Information Technology services were assessed as having a high inherent risk, driven by the very high country risk ratings. These suppliers have been assessed outside of the Water Services Association of Australia (WSAA) / Informed 365 platform, however, a further review will be completed by the end of 2026 with suppliers being invited to complete an assessment to ensure

appropriate due diligence and ongoing monitoring is completed to manage the risks associated with operating in higher-risk countries.

Country and category of overseas spend

Country	Country Risk Rating	Category of Spend	Category Risk Rating	Inherent Risk Rating
Canada	Very low	Software and IT services	Medium	Low
France	Low	Software and IT services	Medium	Low
India	Very high	Software and IT services	Medium	High
Ireland	Very low	Software and IT services	Medium	Low
Israel	Very high	Software and IT services	Medium	High
New Zealand	Very low	Mechanical equipment	Very high	Medium
Singapore	Very low	Software and IT services	Medium	Low
United Kingdom	Very low	Software and IT services	Medium	Low
United States	Low	Software and IT services	Medium	Low

2. Risks of modern slavery

2.1 Supply chain risks

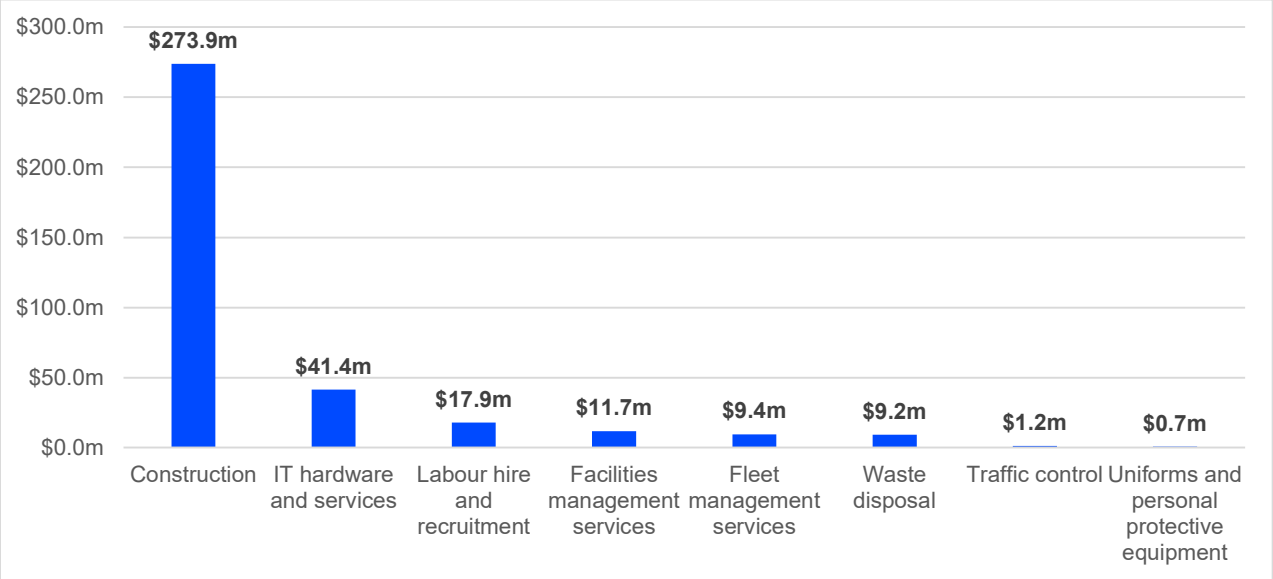
Based on the Global Slavery Index for goods and services that present a high risk for import into Australia and industries where there may be migrant workers, Unitywater reviewed direct suppliers and identified the following industries as those with a high risk of modern slavery:

- Construction services and products.
- Facilities management services, including cleaning and security services.
- Fleet management, including vehicle purchase and maintenance.
- IT hardware and services.
- Labour hire and recruitment services.
- Traffic control.
- Uniforms and personal protective equipment.
- Waste disposal.

Spend in high-risk industries as outlined by the Global Slavery Index during the reporting period is listed below. While the Global Slavery Index outlines that construction is a high-risk industry, the responses

from the high spend construction related suppliers shows that risks ranged from very low to medium based on the suppliers being in Australia and the controls they had in place.

Spend in high-risk industries



2.2 Operations risks

Unitywater recognises its responsibility to ensure its team members 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
Unitywater's suppliers engage in modern slavery.	• Due diligence processes applied to supplier selection. • Contract templates clearly articulate reporting and anti-modern slavery obligations. • Sourcing procedure includes a process on how to assess modern slavery risks. • Response protocol implemented for team members and the community to report suspected instances of modern slavery. • Unitywater continue to develop an understanding of potential for exposure to modern slavery in supply chains. • Unitywater continue to educate and raise awareness of modern slavery for specific Unitywater roles to help identify and mitigate modern slavery risks. • Unitywater 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.

Risk event	Mitigating Processes
Recruitment practices breach modern slavery requirements.	• Employment contracts reviewed against human rights and modern slavery acts. • Unitywater continue to ensure recruitment procedures include validation of applicants' right to work and age. • Unitywater continue to ensure roles are assessed against award standards to ensure at least minimum remuneration is paid, if not better.
Obligations towards team members are not adequately protected or addressed.	• Employment contracts reviewed against human rights and modern slavery acts. • Audits conducted on fatigue management processes and procedures. • Adequate systems of communication are available whereby team members 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

Unitywater seeks to do business only with suppliers that operate ethically and responsibly. We expect our suppliers to offer quality jobs, provide a safe workplace, invest in training workers, demonstrate respect for workers, consider the environment and contribute to positive social outcomes for the communities in which the supplier operates.

3.1.1 Collaboration with others

Unitywater are working closely with the 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, modern slavery topics and supply chain due diligence.

Unitywater also collaborate with Queensland State Government Departments and South-east 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)

The WSAA / Informed 365 platform assesses suppliers based on their country of origin and category of spend to determine a residual risk rating.

As 99% of Unitywater's direct suppliers are based in Australia, the country-of-origin risk is low, while category of spend risks range from low to high. Overall, the residual risk ratings range from low to medium for our direct suppliers.

The 1% of overseas suppliers have been assessed for country and category risks outside of the WSAA / Informed 365 platform with the review of the very high country risk ratings for suppliers in India and Israel in progress at the time of this statement.

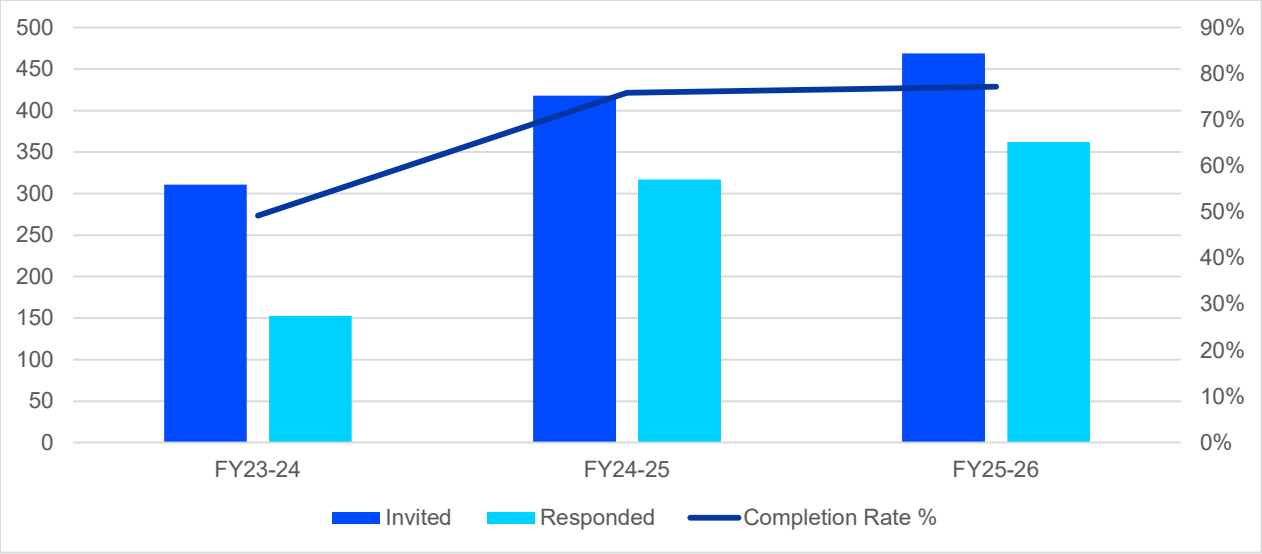
Assessing risk based solely on country of origin and spend category does not provide a complete picture of the modern slavery risks that may exist within our supply chains. To provide a more comprehensive assessment, Unitywater invite suppliers to complete a non-mandatory Supplier Assessment Questionnaire (SAQ). The questionnaire guides suppliers through a self-assessment of modern slavery risks within their operations and supply chains and provides access to educational resources to support ongoing awareness and continuous improvement.

Supplier responses to the SAQ help Unitywater to identify and assess modern slavery risks at an individual supplier level, identify trends and emerging risk patterns across sectors and supply chains, and monitor the effectiveness of actions taken over time.

This reporting period, Unitywater invited 470 direct suppliers to complete a SAQ based on annual spend over $100,000 and suppliers in high-risk industries. This was a 12% increase in invited suppliers compared to the 418 who participated last reporting period. While, SAQs have predominantly been sent to Australian suppliers, all direct overseas suppliers will be invited to complete a SAQ in the next reporting period.

Of the 470 invited suppliers, 362 responded to the SAQ compared to 317 last year, with an overall response rate of 77% as shown in the table below. The continued increase in response rate is due to a focus on engaging with suppliers to respond to the SAQ and embedding of the supplier due diligence process.

SAQ completion rates



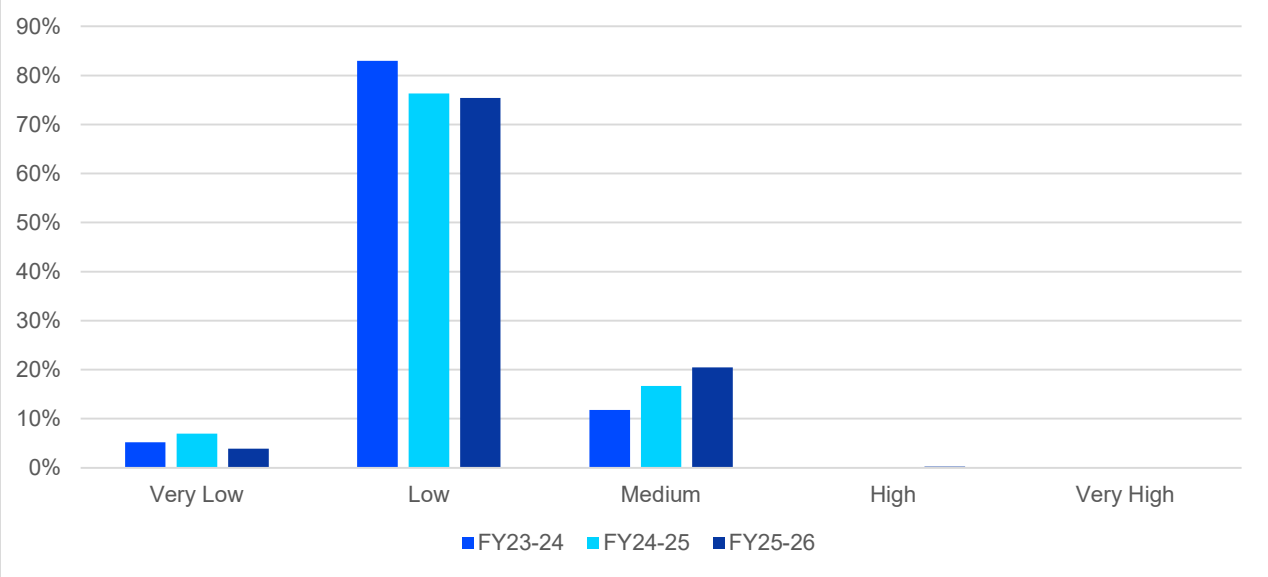
Of the 362 responses received this reporting period via the WSAA / Informed 365 platform based on country, industry and the controls the supplier has in place, 14 were assessed as very low risk, 273 as low risk, 74 as medium risk, and 1 as high risk. There were no very high risk responses.

Unitywater reviewed the high-risk response, and the supplier was invited to clarify details regarding their operations and supply chain. As a small local enterprise, the supplier's internal governance is proportional

to the size and scale of the business. Given the localised nature of their operations and their tier one supply chain being in Australia, the supplier's overall risk rating was downgraded to low.

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

SAQ response rates



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 (SPI), 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.

Risk rating comparison

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

Reviews are completed for SAQ responses that have a medium, high or very high risk rating, or where there is an indication of a non-conforming response. Clarification is sought from suppliers, where required.

Unitywater provides support and guidance on how suppliers can improve their controls. The categories of questions Unitywater focus on include:

- Does the supplier have policies and procedures in place that cover modern slavery?
- What are the supplier's 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). Unitywater are continuing to work with WSAA and Informed 365 to explore ways to gain greater visibility of modern slavery risks deeper within our supply chain to assess Unitywater supplier's suppliers (tier two and beyond). Assessing beyond our direct suppliers will enable Unitywater to better understand potential risks further down the supply chain and identify opportunities for targeted due diligence and risk mitigation

Unitywater 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.

Unitywater will continue to embed the platform into its due diligence processes 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

Unitywater's 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 and manage modern slavery risks, and to notify us of any actual or potential instances of modern slavery. Across Unitywater's active contracts, 94% currently include modern slavery clauses. The remaining 6% of contracts, which have been assessed as presenting a low likelihood of modern slavery risk, will continue to be updated as these contracts reach the end of their current lifecycle.

A modern slavery training program was issued to all leaders across Unitywater, as well as 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 to mitigate potential risks, if risks are identified.

We have a modern slavery response protocol so that team members or the community know how to report if they become 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 this reporting period, all team members are based in Australia with most being employed directly on a permanent basis. As a result, the risk of modern slavery in our operations is low.

The breakdown of workforce for the reporting period is provided in the table below.

Workforce breakdown

	2026
Temporary employees	54
Permanent employees	812
Total number of employees	866

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 team members are given work they are lawfully able to do.
- Ensure that team members 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 as well as training for leaders new to the recruitment process. 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 team members 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 team members 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 embedded within the questionnaire, allowing suppliers to access further information and increase their awareness. There are now 19 resources available within the supplier assessment which were accessed 427 times by suppliers across the consortium platform during the reporting period.

We utilise a subscription-based compliance system developed by a global content provider to identify, monitor and manage modern slavery legislative obligations. Our management team has 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 Codes of Conduct for both team members and suppliers, including contractors, with the Codes incorporating clear expectations around identifying and eliminating modern slavery. Training on the updated Codes has been rolled out to the business to supplement the existing modern slavery training modules.

5. Consultation with subsidiaries

This statement covers Unitywater's consultation with key personnel of its subsidiary companies (Company Secretary and Directors) about the preparation of this statement for the FY2025-26 period and ensured they had an opportunity to contribute to its content.

In the event that 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 27 October 2026 and signed with their authority by Anna Jackson in her role as CEO of Unitywater.



Anna Jackson

CEO, Unitywater on 27 October 2026