

Modern Slavery Policy

Purpose

The purpose of this Modern Slavery Policy is to demonstrate WaterNSW's commitment to preventing modern slavery in its operations and supply chains. Modern slavery refers to situations where coercion, threats, or deception are used to exploit individuals and undermine their freedom.

This policy sets out the principles and actions taken to identify, mitigate, and address modern slavery risks in accordance with the NSW Government Modern Slavery Guidelines and legislative obligations, including the Modern Slavery Act 2018 (Cth).

Commitment

WaterNSW is committed to:

- Taking reasonable and proactive steps to prevent modern slavery from occurring in any part of its operations or supply chains.
- Identifying, assessing, and managing risks related to modern slavery in alignment with the NSW Government Modern Slavery Guidelines on Reasonable Steps.
- Collaborating with suppliers and other stakeholders to communicate our expectations of their compliance with applicable laws, regulations, and best practices in relation to modern slavery.
- Upholding human rights and ethical labour standards in all operations and activities.

Scope

This policy applies to all employees, contractors, suppliers, and third parties who engage with WaterNSW in its operations and supply chains. It covers all aspects of business activities conducted by the organisation, including but not limited to procurement and operational service delivery.

Actions and Due Diligence

WaterNSW commits to the following reasonable steps to combat modern slavery in its operations and supply chains:

Supplier Engagement

We will engage with suppliers to communicate our commitment to preventing modern slavery and the supplier's role in this commitment. This will include requiring suppliers to adhere to our Supplier Code of Conduct and completing due diligence questionnaires related to modern slavery.

Risk Assessments

Regular risk assessments will be conducted to evaluate the likelihood of modern slavery occurring within our high risk supply chains. This will include both direct suppliers and any extended supply chain partners.

Training and Awareness

We will provide training and awareness for employees to increase awareness of modern slavery, how to spot signs of exploitation, and the proper channels for reporting concerns.

Contractual Requirements

Contracts with suppliers will include clauses that explicitly prohibit modern slavery practices and require adherence to ethical labour standards. Suppliers may also be expected to undertake appropriate due diligence and provide transparency into their own operations and supply chains.

Reporting Mechanisms

We will establish and maintain accessible reporting mechanisms for employees and external parties to raise concerns about potential or actual modern slavery practices. These mechanisms will protect whistleblowers from retaliation.

Monitoring and Compliance

- WaterNSW will regularly monitor compliance with this policy, including assessing the effectiveness of the steps taken to address modern slavery risks.
- We will review and update this policy as necessary, in response to changes in laws, regulations, and business practices.
- Non-compliance with this policy may result in corrective actions, including termination of contracts or business relationships with suppliers who fail to meet our modern slavery standards.

Collaboration and Transparency

WaterNSW is committed to transparency in addressing modern slavery. We will:

- Publicly report our actions to prevent modern slavery in accordance with legislative requirements.
- Share relevant information with stakeholders, including government agencies, customers, and the community, regarding our efforts to combat modern slavery.



Governance and Accountability

The Executive Manager Finance, Legal and Risk is accountable for overseeing the implementation of this policy.

The Modern Slavery Working Group is responsible for coordinating the implementation of the policy requirements across the organisation.

The Executive Manager Finance, Legal and Risk is responsible for reporting on the progress of implementing modern slavery initiatives and improvement opportunities to the Executive Leadership Team, Board Audit and Risk Committee and the Board. The reporting should occur at least annually.

Review

We will review this policy every 2 years.

Approved by
The Board of WaterNSW
28 May 2025