

Modern Slavery Statement

2023-2024



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A message from our Chief Executive Officer

On behalf of Water Corporation's Board, I am pleased to present our 2023-24 Modern Slavery Statement, prepared in accordance with the requirements of the Modern Slavery Act 2018.

At Water Corporation, we are committed to identifying and eliminating modern slavery from our operations and supply chains. Preventing modern slavery is a collective responsibility; we all have a role to play in identifying and addressing it within our ways of working across Water Corporation.

Modern slavery is a serious issue affecting millions globally. It involves coercion, threats, or deception to exploit people and deprive them of their freedom. Unfortunately, modern slavery remains prevalent in industries such as agriculture, construction, domestic work, cleaning, hospitality, and food services – sectors we engage with daily to deliver safe and sustainable water services to all Western Australians.

Our long-term strategy, Thrive2035, is guiding our future direction, enabling us to fulfill our promise of a thriving, safe and sustainable future for our state. Covering over 2.6 million square kilometres, we touch every corner, supported by committed, diverse and dedicated teams. Our people bring unique skills and perspectives, ensuring our actions always reflect our values and inspire trust and confidence.

Underpinning Thrive2035 are our environmental, social, and governance measures, which reinforce our commitment to sustainable and responsible business practices. This allows our actions, including those specific to preventing modern slavery, to be prioritised, managed, and reported centrally.

This year, we have continued to take active steps to ensure we have an ethical supply chain.

Some of our key actions achieved in 2023-24 include:

- Training our people to increase awareness of modern slavery risks and associated impacts encountered in their daily work activities.
- Improving visibility and understanding of our supply chains.
- Enhancing the quality of our supplier data.
- Continuing to develop our tiered supplier due diligence process.
- Reporting key performance indicators bi-annually to our Audit & Risk Committee.
- Participating in internal audits, delivered by our management review and audit section.
- Advancing our modern slavery roadmap initiatives for FY25, aligned with our security of critical infrastructure work.

I am proud of our progress to date and remain dedicated to furthering our efforts in the coming year. As such, I look forward to sharing our further achievements with you in future statements.

This statement is signed by Pat Donovan in his role as Chief Executive Officer of Water Corporation on 26th November 2024.



Pat Donovan

Chief Executive Officer



Who we are

Modern Slavery Statement

This statement has been prepared on behalf of Water Corporation (ABN 28 003 434 917), pursuant to the Modern Slavery Act 2018 (the “Act”) for the 2023-24 financial year. We are a government trading enterprise within Australia. In accordance with the requirements of the Act, this statement was approved by our Board of Directors in their capacity as the principal governing body of Water Corporation on 26th November 2024.

In our previous statement, Water Corporation outlined the establishment of the Flat Rocks Wind Farm Stage 2 Pty Ltd subsidiary, which is required to operate in accordance with the policies and procedures of Water Corporation and thus continues to ensure deep focus and consideration of modern slavery in all aspects of the project.

About us

Water Corporation is the principal supplier of water, wastewater, drainage, and bulk irrigation services in Western Australia (WA) to hundreds of thousands of homes, businesses, and farms. Directly employing more than 4,000 people, we provide a high level of expertise and a strong commitment to our customers, community, and state. We manage \$38 billion (replacement value) of assets to deliver water services across 2.6 million square kilometres. We are owned by the Western Australian Government and accountable to the Minister for Training and Workforce Development; Water; and Industrial Relations, the Hon. Simone McGurk MLA, for the delivery of our services. Working across government and supporting state development is essential to a well-functioning public sector. Our head office is in Leederville, Western Australia and our regional offices are located in Bunbury, Albany, Karratha, Geraldton, Kalgoorlie and Northam.

In FY23, Water Corporation became the proud developer of the Flat Rocks Wind Farm Stage 2 project, located in WA approximately 30km from Kojonup. Once commissioned, the wind farm will generate around a quarter of the total renewable energy required to achieve our target of net zero emissions across all operations by 2035. We entered into an agreement to purchase the entire share capital of the wind farm from Moonies Hill Energy Pty Ltd, which was finalised on 11 November 2022. The transfer of shares was completed on 22 December 2022. Modern slavery has and will continue to be a central consideration of this project throughout the construction and operational phases, and monitoring of the wind energy supply chain will persist as the project progresses. Currently, the project team’s focus is on grid connection, completing surveys and community and stakeholder engagement.

Our purpose and vision

We exist to sustainably manage water services to make Western Australia a great place to live and invest. Our vision is for our people, communities and state to thrive. Guiding our future direction is our corporate strategy – Thrive2035. Our strategy objectives and goals are woven into the work we do every day.



Our values

Our values are the heartbeat of our business. They are central to our journey toward achieving our Thrive2035 goals. Our values work in partnership with our six goals and lay the foundation for how we work together. They guide our decision-making and set the tone for how we interact with each other, our customers, and our stakeholders. They are more than just words on a page – they are felt and lived every day.



Our operations

As at 30 June 2024, we employed over 4,000 employees across the state. Our operations also included indirect workers, as well as sub-contractors and labour-hire resources, who supported our business during the reporting period.

The construction phase of Flat Rocks Wind Farm Stage 2 will generate up to 130 jobs, with contractors and subcontractors to be engaged to undertake the construction works. There are no staff currently in the subsidiary, and only Australian consultants and contractors have been engaged to date.

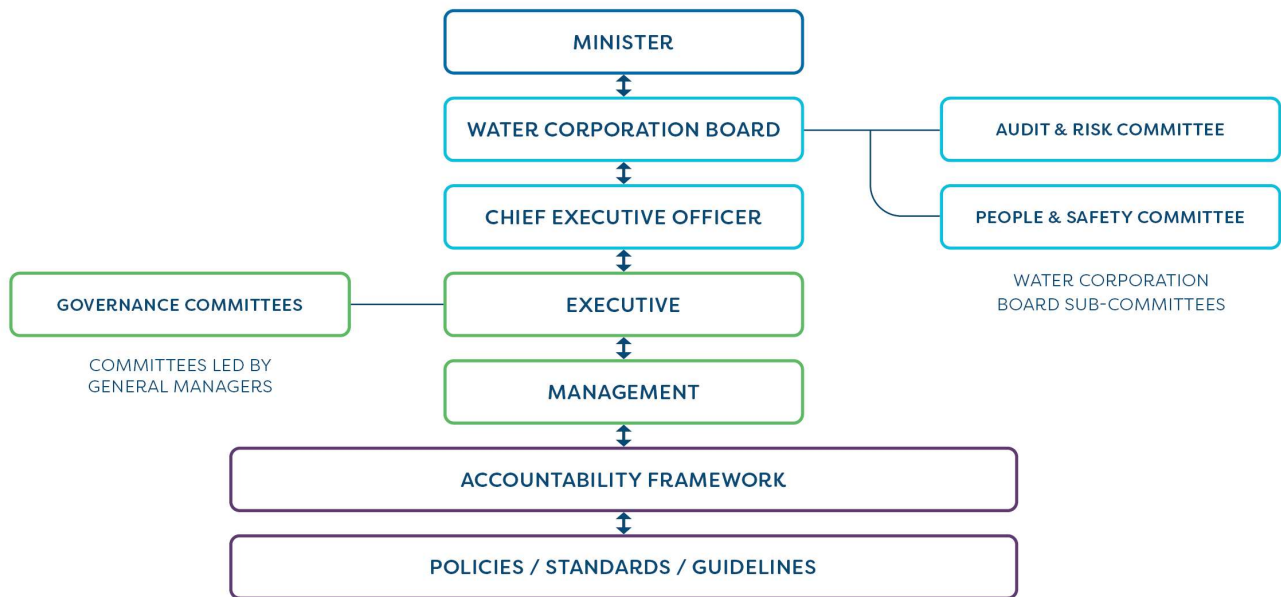
The nature of the roles across our organisation remains diverse. We have office-based roles in our customer service and corporate services teams, technical expert roles in our engineering services and information technology teams and fieldwork and manual labour roles in our operations teams who work within our communities. We continue to create opportunities for young people through our career entry programs. These include trainees, apprentices, graduates, customer centre trainees, engineering apprenticeship trainees, vacation program graduates and school-based trainees.

Our supply chain

We procure goods and services which primarily relate to the delivery of water, wastewater, drainage, and bulk irrigation services, and the maintenance of our water and sewer assets. Within the reporting period, we sourced goods and services from approximately 2,407 suppliers, including but not limited to, construction, asset maintenance, chemicals, information technology, customer management and facilities management. Approximately 98.55% of our suppliers within the year were based in Australia. The remaining 1.45% of suppliers were based in Canada, Denmark, France, Germany, Ireland, Lithuania, Singapore, Switzerland, the United Kingdom, and the United States of America.

Our governance structure

Our Board is responsible for overseeing and reviewing the management, administration and governance of Water Corporation and has overarching accountability for modern slavery. Our Audit and Risk Committee is principally responsible for establishing and maintaining our risk profile, including oversight of modern slavery risks. The Chief Executive Officer and Executive Leadership Team are responsible for implementing modern slavery measures and managing our modern slavery risks. Responsibility for driving our modern slavery program lies with our Chief Financial Officer and Head of Procurement and Property, supported by other relevant parts of our business including Risk and Assurance, Legal Services and People and Safety.



Managing modern slavery risks

Our position

Respecting and promoting the human rights of our people, and the people in our supply chain, is important to us. Anchored in our Code of Conduct, we are committed to environmental and social governance. We take care and diligence to ensure we act to identify, prevent, and mitigate adverse impacts. We recognise modern slavery risks exist within our operations and supply chain. As such, we have a role to play in preventing and addressing modern slavery practices that we may contribute to because of our business activities and relationships. We have continued to develop our modern slavery program which seeks to contribute to the prevention, identification, and remediation of modern slavery practices in our supply chain. We want to ensure no one suffers

harm as a result of our business activities, including our people and those we interact with through our activities and business relationships.

Our position and commitment to upholding human rights align with our vision and values. We act in the best interest of our people and the community, put safety first, and take accountability for our actions to ensure our people, communities and state can thrive. Responsible conduct is important to us. We work to ensure we are operating our business with integrity and value safety for all. We nonetheless recognise there is a risk of human rights violations within our operations and supply chain.

Risk in our operations

We consider the risk and likelihood of modern slavery within our operations to be low. This is based on our workforce composition and the controls we have in place. We have developed appropriate corporate governance to ensure equity and fair treatment of everyone working at Water Corporation. Our Code of Conduct, Recruitment Policy, Ethics and Fair Dealing Policy, Equity and Diversity Policy, Occupational Health and Safety Policy, employee policies and standard practices in place, mitigates the modern slavery risks for our direct employees.

We have a Water Corporation Enterprise Agreement approved by the Fair Work

Commission, which sets out employee entitlements and terms and conditions for direct employment. Our employment agreements communicate working rights and the terms of employment, including remuneration and working hours. We also confirm the appropriate visa status for employees and ensure we comply with workplace relations laws. Direct employees are a significant part of our workforce, and many are represented by unions. This further supports our employees and ensures labour-related risks are minimised through a collective bargaining position and forum for discussion of issues for workers.

Water Corporation Code of Conduct

“We act with the best intent, diligence and social conscience ensuring we preserve human rights and freedoms of law [and] conduct business with third parties that embed respect for human rights into culture and practice (identifying severe risks to human rights including modern slavery)”.



Managing risks in our operations

When considering the inherent risks of modern slavery within our workforce, apprentices, trainee employees, and workers engaged through labour hire arrangements were identified as potentially vulnerable workers. We have mitigation measures in place to minimise these risk factors.

Workforce Category	Details
Apprentices and trainees	The age and level of experience of apprentices and trainees increases their inherent vulnerability to exploitative practices. However, this risk is mitigated by the suite of policies and procedures outlined above as well as a number of specific control measures. We provide training and require our apprentices and trainees to reach a level of proficiency prior to progressing. This ensures we have provided our apprentices and trainees with the background, experience, and competency to work within our operations safely and effectively. Furthermore, apprentices and trainees are covered by our Enterprise Agreement, which sets out working hours and pay rates. Apprentices and trainees are made aware of the channels available to them to report any concerns or grievances.
Labour hire and agency contractors engaged through third parties	While using labour hire and agency contractors has an inherently higher modern slavery risk profile, we have a panel of contracted labour hire providers, with formally established terms and conditions, including the requirement that our contractor payment rates are aligned with the payment rates of workers directly engaged by us. We also maintain regular contact and have the ability to complete checks over contracted suppliers, where required. There is limited use of labour hire contractors outside of Australia.

We have additionally rolled out organisation wide mandatory modern slavery training to ensure our people are informed of risks that could have an impact on their daily operations.

Risks in our supply chain

While our suppliers are predominantly Australian based, we recognise modern slavery practices exist within Australia, and therefore there are still risks present. We are cognisant certain categories of goods and services provided by our Australian suppliers may have a higher inherent risk of modern slavery due to the nature of the industry and the modern slavery risks upstream in their supply chain. In the table below, we have identified a set of higher risk industries and sectors in which our suppliers operate. These industries were identified by conducting a risk assessment based on methodology from the Global Slavery Index, as

well as considering the supplier criticality and level of spend. The nature of these industries, products and services lends themselves to a common set of modern slavery risk factors. There is a heightened vulnerability and therefore risk of incidents of labour exploitation, such as forced labour, bonded labour, and child labour, within these industries. This is due to the presence of risk factors such as the low-skilled nature of work, employment of migrant workers, lack of industry regulation, high labour intensity and presence of sub-contracting and multi-tiered supply chains.

Higher risk categories	Types of products and services procured
Cleaning	Services for cleaning of dams, depots, panels, pipes, and office buildings
Clothing and Personal Protective Equipment (PPE)	Staff uniforms and PPE
Construction	Contracted services to build assets
Energy	Solar and wind
Freight and Logistics	On-road couriers and waste transportation
Information Technology	Hardware supply, operational technology and maintenance and IT services.
Manufacturing	Industrial parts (e.g. Steel pipes, plastic pipes, copper pipes, ductile iron pipes, cement and mild steel valves, rubber valves, steel disc washer) and Chemicals

Procurement Policy

Procurement at Water Corporation is guided and underpinned by internal policy and standards which ensure ethical and equitable procurement processes are followed.

The objectives of our procurement policy are to:

- act ethically and exercise due fairness, equity, and probity in all facets of our process, while exercising our marketplace influence responsibly and with due care and consideration.
- manage the occupational safety and health process in all procurement activities and through the actions of our suppliers to the extent that our decisions can influence these behaviours.

Managing risks in our supply chain

1. Modern slavery training

To ensure all employees across Water Corporation have awareness and knowledge to identify and prevent modern slavery, we developed organisation wide modern slavery training which details the inherent risks which may exist in our supply chains, what to look out for and where to report any instances they may encounter in their operations. This mandatory training was rolled out to all employees in FY24 to.

2. Modern slavery supplier due diligence framework development & integration

We commenced implementation of our modern slavery supplier due diligence framework in the FY24 period.

Our framework was developed using international standards and guidance, including, among others, the United Nations Guiding Principles on Business and Humans Rights and OECD Due Diligence Guidance for Responsible Business Conduct, to ensure alignment to global best practices in human rights and modern slavery. We believe this is an essential step in managing risks which may exist in our supply chain and lays the foundation for us to prioritise efforts and more effectively respond to identified risks and impacts through targeted due diligence activities.

We will share more information in our future statements about progress of the implementation of the framework.

3. Compliance with our terms and conditions

We have included modern slavery considerations in contract terms and conditions with new suppliers since 2019. We manage our suppliers in line with our Procurement Policy and corporate standards to promote ethical practices within our supply chain. All agreements with suppliers require compliance with modern slavery laws, including reporting any modern slavery instances identified in their business or supply chains.

4. Development of a new supplier screening

Modern slavery considerations are integrated into our tender processes to understand suppliers' modern slavery risk profiles prior to engaging them. During the tender process, potential suppliers are required to provide information about their ethical purchasing and modern slavery policies and actions taken to assess and address modern slavery risks.

We have continued to enhance our approach to supplier data capture during and beyond onboarding to identify potential risks of modern slavery in our supply chain.

5. Prioritised future activities

We have created a prioritised roadmap for the delivery of key modern slavery improvement initiatives which are to be implemented and embedded into our business-as-usual practices over the next two financial years.

Activities are extensive and these improvement initiatives are expected to improve our approach to managing modern slavery risks throughout our operations and supply chain.

We will share more information in our future statements and progress is made.

Grievance mechanism and remediation

We have embedded grievance mechanisms and whistle-blower protection processes available to our employees, suppliers, and stakeholders. Our Whistleblowing Policy outlines how we receive, investigate and address grievances.

All matters raised are reported to the Board through our Audit and Risk Committee. The Whistleblowing Policy is communicated to employees through the annual Code of Conduct acknowledgement, whereby employees are required to acknowledge they have read and understood the Code of Conduct. There are two channels available to raise a grievance. The channels include an internal complaints process and an anonymous telephone number managed by a third party. This hotline is run by an independent external organisation to ensure confidentiality and allow for anonymous reporting. A whistle-blower can make their disclosure anonymously, confidentially, and outside of business hours and receive updates on their disclosure status while retaining anonymity.

We are committed to investigating all instances of actual or suspected modern slavery reported through our grievance mechanisms. Where an investigation confirms the presence of modern slavery in our supply chain or business operations, we will take action as detailed in our Misconduct Guideline. Our Head of Risk and Assurance is responsible for investigating and responding to any reports received through the hotline or internal processes.

We also continue to report to our Audit & Risk Committee on a bi-annual basis and support our Risk & Assurance team with their Critical Control Reviews, both ensuring continuing accountability in this space.

During the reporting period, there were no reports of modern slavery practices through our grievance mechanisms.

Measuring the effectiveness of our actions

We continue to measure the effectiveness of modern slavery actions through our improved internal modern slavery reporting. We introduced key performance indicators (KPIs) for managing risks of modern slavery, relating to reports of modern slavery, supplier assessment and testing, training, and remediation actions. The KPIs have continued to be reported on bi-annually to our Audit and Risk Committee.

We are also continuing the implementation of our framework for the ongoing management of modern slavery risks. Our KPIs will continue to evolve as we mature our approach and develop a more robust modern slavery framework. These enable us to continually measure the effectiveness of our actions.

Looking ahead: Future reporting period

We are continuing to develop our modern slavery program and strengthening associated policies and practices. As part of our evolving approach to identifying, mitigating, and remediating modern slavery risks, we are continuing to focus on the activities set out below.

Modern slavery training

During the FY24 period, we rolled out the modern slavery training to all Water Corporation employees. We will continue to ensure existing and future staff complete this mandatory training module. We will also continue to enhance training on risk identification and mitigation and investigate future training opportunities to deliver to our people.

Modern slavery framework and prioritised roadmap integration

We have prioritised activities that form part of our modern slavery framework and commenced implementation. We will continue to progressively implement the framework and embed modern slavery practices into our business-as-usual processes over the coming financial years. This is a major ongoing step in our management and reporting of modern slavery risks in our supply chain.

Tiered supplier due diligence

We have continued to implement a tiered supplier due diligence process. This process will enable us to prioritise efforts and respond to identified risks through targeted due diligence activities.

Enhance supplier data capture

We will continue to review our supplier data collection processes to improve how we capture supplier information. This will enable us to continuously review and improve the way we capture supplier data collection.

Establish a modern slavery working group

We will establish a modern slavery working group to ensure adequate governance and accountability in managing modern slavery risks. The group will aim to monitor, support, and educate the business in addressing potential modern slavery risks.

Collaboration

We have continued to explore collaboration and partnership opportunities with other entities to focus efforts on identifying and addressing modern slavery risks and impacts. We will report on our progress in future modern slavery statements.

Appendix

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Water Corporation as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 26th November 2024.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Water Corporation as defined by the Act. Water Corporation’s Modern Slavery Statement was prepared in accordance with the mandatory criteria listed in s16(1) of the Australian Modern Slavery Act 2018. The table below lists the criteria and the sections in our statement that address each.



Pat Donovan
Chief Executive Officer

Reference	Australian Modern Slavery Act 2018 (Cth) mandatory reporting requirement	Location of information
s 16(1)(a)	Identify the reporting entity	Modern Slavery Statement Pg. 4
s 16(1)(b)	Describe the structure, operations, and supply chains of the reporting entity	About Water Corporation Pg. 4-6
s 16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Managing modern slavery risks in our operations Pg. 7-8 Managing modern slavery risks in our supply chain Pg. 9-11
s 16(1)(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Managing modern slavery risks in our operations Pg. 7-8 Managing modern slavery risks in our supply chain Pg. 9-11
s 16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	Measuring the effectiveness of our actions Pg. 12
s 16(1)(f)	Describe the process of consultation with: i) any entities that the reporting entity owns or controls; and ii) in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	Who We Are Pg. 4
s 16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Looking Ahead: Future reporting period Pg. 12

