

# Modern Slavery Statement

2024-2025



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## A message from our Chief Executive Officer

On behalf of Water Corporation's Board, I am pleased to present our Modern Slavery Statement for financial year 2025, prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* (the Act).

Water Corporation is committed to delivering safe and sustainable water services supporting the people and communities of Western Australia. We recognise our responsibility to uphold and promote ethical practices and are dedicated to identifying and mitigating modern slavery risks across our operations and supply chains.

Our long-term strategy, Thrive2035, places environmental, social and economic sustainability at its core and we have a unique opportunity to help our state thrive now and into the future. We believe every individual should have the right to freedom and fair working conditions and are committed to ensuring all workers are treated with dignity and respect. Our actions to prevent modern slavery are centrally prioritised, managed, and reported. In financial year 2025, we continued to strengthen our approach through the following key initiatives:

- **Supplier Code of Conduct:** Established clear expectations for suppliers, including commitments to human rights and modern slavery prevention.
- **Human Rights Grievance and Remediation Procedure:** Supported our response to allegations of human rights violations, including modern slavery.
- **Supplier engagement:** Engaged with our suppliers to better understand modern slavery and broader labour rights risks within our supply chain.
- **Employee training:** Increased awareness of modern slavery risks and their potential impacts in daily work activities.

I take great pride in the progress we've made and the growing momentum behind our efforts to address modern slavery. I'm committed to building on this foundation and look forward to sharing further milestones in future statements as our work continues to evolve.

This statement is signed by Pat Donovan in his role as Chief Executive Officer of Water Corporation on 1 December 2025.



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 Act for the financial year 2025. We are a Government Trading Enterprise owned by the Western Australian Government.

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 26 November 2025.

## About us

Water Corporation is the principal supplier of water, wastewater, drainage, and bulk irrigation in Western Australia, providing services to hundreds of thousands of homes, businesses and farms across the state. We are the world's largest water utility (by area serviced) on the driest inhabited continent. We are accountable to the Minister for Water, the Hon. Don Punch MLA, for the delivery of our services.

We are a team of around 5,450 as of 30 June 2025, including our direct and indirect workforce. Our workforce is as broad and diverse as Western Australia itself and includes engineers, operators, and trades roles. Our head office is in Leederville, Perth and our regional offices located in Bunbury, Albany, Karratha, Geraldton, Kalgoorlie and Northam. We manage assets to deliver water services across 2.6 million square kilometres.



*We are dedicated to proactively identifying, addressing, and managing modern slavery risks within our operations and partnerships, ensuring the delivery of safe and sustainable water services across Western Australia.*

## Our purpose and vision

Our purpose is to manage water services sustainably to make Western Australia a great place to live and invest. We are guided by our vision 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.

### Working as one

We make a bigger impact together, working towards a shared purpose to benefit all of WA.

### Delivering on our promises

We achieve our goals efficiently, delivering on what we say we will do.

### Finding better solutions

We are curious to learn, with courage we challenge the status quo.

### Leading with care

We care for our communities and each other.

## Our operations

As of 30 June 2025, we employed around 5,450 people in Western Australia, including our direct workforce of over 4,000 employees and our indirect workers, being our contractors, subcontractors and labour hire resources. It takes a lot of people to keep the water running, maintain essential wastewater and drainage services, and find innovative solutions to future-proof our State.

Our workplace offers opportunities for our employees to thrive and grow. 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 also continue to provide a variety of opportunities for young people through graduate programs, vacation student programs, apprenticeships, engineering associate traineeships, and water operations traineeships.

## Our supply chain

We procure goods and services primarily to support the delivery of water, wastewater, drainage, and bulk irrigation services, in addition to the maintenance of our water and sewer assets. In financial year 2025, we engaged over 2,500 suppliers to provide goods and services across a range of industries including construction, asset maintenance, chemicals, information technology, customer management and facilities management.

Approximately 98.5 per cent of our suppliers had head offices in Australia in financial year 2025, with the remaining 1.5 per cent of suppliers based in Canada, China, France, Germany, Great Britain, Ireland, Israel, Malaysia, Netherlands, New Zealand, Singapore, Switzerland and the United States of America. In financial year 2025 our direct supplier spend was approximately \$1.88 billion.

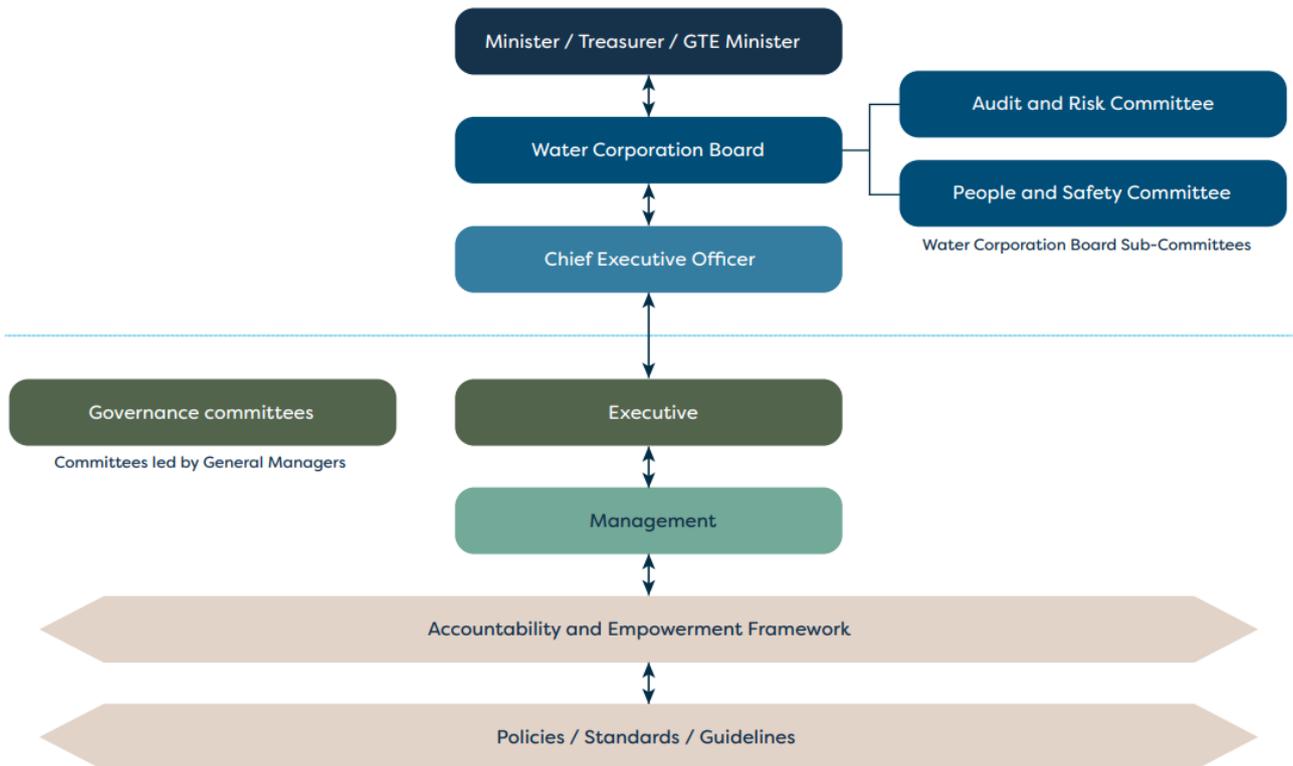
## Our governance structure

Our Board’s role is to govern Water Corporation with the authority to fulfill its purpose through performing its functions, determine the policies and control the affairs of Water Corporation, which includes overarching accountability for modern slavery.

Our Audit and Risk Committee is principally responsible for ensuring an overall risk management framework is in place by:

- Reviewing Water Corporation's Corporate Risk Report to ensure that material business risks to the Corporation are dealt with appropriately.
- Ensuring that there is regular review and update of Water Corporation's Corporate Risk Report.
- Ensuring that the material business risks are dealt with in a timely manner to mitigate exposures to Water Corporation.
- Reviewing performance against risk appetite as set by the Board.

Our Board delegates certain powers to the Chief Executive Officer (CEO), who then subdelegates these powers to the Executive Team, Heads of Business Units and other Water Corporation employees. 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 are responsible for driving our modern slavery program.



# Managing modern slavery risks

We continue to strengthen governance, improve risk identification, and enhance ethical practices across the organisation. We have built on our progress during financial year 2025 to improve how we manage our modern slavery risks, including strengthening our position and working to set our expectations for suppliers, working to improve visibility over our supply chain risks, and building the capability of our people in relation to modern slavery.

## 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 aim to identify, prevent, and remediate any adverse impacts related to modern slavery. We acknowledge that modern slavery risks may be present within our operations and supply chains.

As a prominent business in Western Australia, we recognise our responsibility in promoting ethical business standards among the suppliers and partners we engage with.

This includes taking steps to consider and respond to modern slavery risks that could arise from our business activities and relationships. We have focused on improving our modern slavery program, particularly in how we assess, address, and remediate any instances of modern slavery that may occur within our operations and supply chains.

Our dedication to protecting human rights is deeply rooted in our core values and our long-term strategy, Thrive2035. We prioritise the well-being of our people, the broader community and state, upholding safety as a fundamental principle, and take responsibility for our actions to foster a thriving environment for all. Ethical conduct is the cornerstone of how we operate. We strive to conduct all our operations with honesty and a strong commitment to safety

## Risk in our operations

Water Corporation considers the risk and likelihood of modern slavery within our operations to be low based on where we operate, our workforce composition, and our risk management measures.

Our corporate governance structure is designed to support the fair treatment of everyone who works for Water Corporation. Our Code of Conduct, Recruitment Policy, Ethics and Fair Dealing Policy, Equity and Diversity Policy, Occupational Health and Safety Policy, among other policies and standard practices inform how we manage, mitigate, and appropriately address modern slavery risks for our direct employees. We have also rolled out organisation-wide modern slavery training so our people are better aware of modern slavery risks and impacts, and how these could intersect with their roles and the business more broadly.

We operate under the Water Corporation Enterprise Agreement, approved by the Fair Work Commission, which outlines the entitlements, terms, and conditions for our direct employees. Our employment agreements clearly define employee rights, including details on pay, working hours, and other key conditions. We also have modern slavery related controls in place to mitigate risk such as verifying employees' visa status to ensure compliance with workplace relations legislation. Direct employees make up the majority of our workforce, and many are union members.

## Our goal

To ensure that no individual experiences harm as a result of our operations, this includes our employees and all those connected to our business activities and partnerships.

Union representation provides an additional layer of support, helping to reduce labour-related risks through collective bargaining and structured dialogue on workplace matters.

In assessing the inherent risks of modern slavery within our workforce, we have identified apprentices, trainees, labour hire workers, and individuals recruited through agencies as being potentially more vulnerable to exploitation.

## Managing risks in our operations

To address the inherent risk of modern slavery within our workforce, as identified above, we have implemented targeted mitigation measures in Table 1, designed to reduce these risk factors and safeguard the rights and wellbeing of all our direct workers.

**Table 1. Mitigation measures**

Workforce category	Details
<b>Apprentices and trainees</b>	<p>Due to their age and limited workplace experience, apprentices and trainees may be more susceptible to exploitative practices, such as being expected to work unpaid overtime.</p> <p>We have structured training for apprentices and trainees and level of proficiency considerations before advancing in their roles. Our approach focuses on knowledge, skills, and confidence to work safely and effectively. Additionally, our Enterprise Agreement outlines entitlements, including working hours and pay rates, and we inform our workforce about appropriate channels for raising concerns or lodging grievances.</p>
<b>Labour hire and agency contractors</b>	<p>To manage risks associated with using labour hire and agency contractors, we engage a panel of approved labour hire providers under formal agreements that include clearly defined terms and conditions.</p> <p>These agreements require contractors to pay rates consistent with those offered to our directly employed workers. We maintain ongoing communication with these providers and have the capacity to conduct compliance checks when necessary. The use of labour hire contractors outside Australia is minimal, further reducing exposure to international risk factors.</p>



*We apply targeted mitigation strategies to minimize risk factors and uphold the rights and wellbeing of all our direct workers.*

## Risks in our supply chain

We recognise that we have modern slavery risks in our supply chains associated with the goods and services that we buy. In financial year 2025, the majority of our suppliers were headquartered in Australia, which has a lower direct risk of modern slavery. However, modern slavery practices do exist within Australia, and therefore the risks are still present as well as in our supply chain beyond our direct Australian suppliers.

We also purchased goods and services from suppliers with head offices located in Canada, China, France, Germany, Great Britain, Ireland, Israel, Malaysia, Netherlands, New Zealand, Singapore, Switzerland and the United States of America. In Table 2, we have included the estimated prevalence of modern slavery and the estimated number of people in modern slavery from the Global Slavery Index<sup>1</sup> for our financial year 2025 suppliers.

**Table 2. Estimated prevalence of modern slavery and estimated number of people in modern slavery from Global Slavery Index for financial year 2025 suppliers**

Country	Estimated prevalence of modern slavery per 1,000 population	Estimated number of people in modern slavery
Australia	1.6	41,000
Canada	1.8	69,000
China	4.0	5,771,000
France	2.1	135,000
Germany	0.6	47,000
United Kingdom	1.8	122,000
Ireland	1.1	5,000
Israel	3.8	33,000
Malaysia	6.3	202,000
Netherlands	0.6	10,000
New Zealand	1.6	8,000
Singapore	2.1	12,000
Switzerland	0.5	4,000
United States of America	3.3	1,091,000



*When sourcing pipes and infrastructure, we strive to understand our suppliers' supply chains to uncover inherent modern slavery risks and work proactively with them to minimize them.*

<sup>1</sup> Walk Free, [Global Slavery Index 2023](#)

Certain categories of goods and services we buy have a higher inherent risk of modern slavery due to risk factors present in the industry, and the modern slavery risks upstream in the supply chain. In Table 3, we have outlined the higher risk industries and sectors we engage with throughout our supply chain.

These industries have an increased risk of human rights violations including forced labour, bonded labour, and child labour, due to a range of contributing factors. These factors include the low-skilled nature of the work, reliance on migrant labour, limited regulatory oversight, high labour demands, and the use of subcontracting and complex, multi-tiered supply chains.

**Table 3. Higher risk industries**

Higher risk categories	Types of products and services procured
<b>Cleaning</b>	Services for cleaning of dams, depots, panels, pipes, and office buildings
<b>Clothing and Personal Protective Equipment (PPE)</b>	Staff uniforms and PPE
<b>Construction</b>	Contracted services to build assets
<b>Energy</b>	Solar and wind
<b>Freight and logistics</b>	On-road couriers and waste transportation
<b>Information Technology (IT)</b>	Hardware supply, operational technology and maintenance and IT services
<b>Manufacturing</b>	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

## Policies and standards

### Procurement policies objectives

Uphold ethical standards and promote fairness, equity, and integrity throughout all stages of the procurement process, while using our influence in the marketplace with responsibility, care and consideration.

Support and promote occupational safety and health in all procurement activities, including those carried out by our suppliers, wherever our decisions can positively influence these practices.

Water Corporation has internal policies and standards which support ethical and equitable procurement processes.

#### Supplier Code of Conduct

In financial year 2025, we developed a Supplier Code of Conduct to help set clear expectations for our suppliers, including in relation to managing modern slavery and broader labour rights risks. This Supplier Code of Conduct is currently being reviewed and approved by Water Corporation and will be finalised and implemented in financial year 2026.

#### Supplier agreements

Since 2019, we have included modern slavery considerations in contract terms and conditions with new suppliers. All agreements with suppliers require compliance with modern slavery laws and include specific modern slavery obligations, including reporting modern slavery related incidents to us if they are identified in a supplier's operations or supply chains.

#### Supplier screening

Modern slavery considerations are integrated into our tender processes to support our understanding of suppliers' modern slavery risk profiles prior to engaging with 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 continue to consider our approach and identify opportunities to strengthen how we manage modern slavery risks in our supply chain. In financial year 2026, we will continue to refine our approach by obtaining additional information from suppliers during onboarding, helping to support the identification of potential modern slavery risks within our supply chain. We are also developing our processes to support how we identify and manage supplier risks, including modern slavery.

## Managing risks in our supply chain

### Modern slavery training

Water Corporation have an established modern slavery training module to support our people in identifying and preventing modern slavery. The training module was rolled out in financial year 2024 and covers inherent modern slavery risks in our supply chains, risk factors to look for, and reporting related to modern slavery. In financial year 2024 and financial year 2025, 99.1 per cent of Water Corporation employees completed this training.

Once finalised in financial year 2026, we will also provide training on our new Supplier Code of Conduct to our procurement team members. This training will support our people to engage with suppliers in relation to our expectations and will help us to identify, assess, and address modern slavery risks in Water Corporation's supply chain.

### Modern slavery supplier due diligence framework development and integration

In financial year 2025, as part of our Water Corporation Modern Slavery Due Diligence Procedure, we assessed suppliers based on inherent modern slavery risks associated with industry and geographical location (based on headquarter locations), as well as other factors such as spend, longevity of relationship, and criticality. This informed our selection of suppliers to complete our Modern Slavery Questionnaire.



#### ***Modern slavery case study***

As part of our ongoing commitment to identifying and mitigating modern slavery risks within our supply chain, we conducted a review of the country-of-origin data for catalogued and inventoried items. By cross-referencing this data with the Walk Free Global Slavery Index, we identified one product being sourced from a country classified as high risk.

Using internal procurement data, we traced the item to a specific contract and supplier. Our Procurement team engaged directly with the supplier to negotiate a change in the country of origin for the product. In addition, we requested that the supplier conduct a broader review of their entire product range (not limited to those supplied to Water Corporation) to identify any other items sourced from high-risk countries.

As a result of this engagement, discussions regarding country of origin have been embedded into the process for adding new items to the contract. This topic is now a standing agenda item in regular contract management meetings, ensuring ongoing vigilance and proactive risk management.

Engaging with suppliers supports us to have a better understanding of modern slavery risks within our supply chain and the controls suppliers have in place to mitigate modern slavery risks. These due diligence activities are important for Water Corporation to better manage its modern slavery risks and to identify any corrective actions for suppliers.

## Grievance mechanism and remediation

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

The Whistleblowing Policy is communicated to employees through the annual Code of Conduct acknowledgement, where employees are required to acknowledge they have read and understood the Code of Conduct.

In financial year 2025, we also developed a detailed Human Rights Grievance and Remediation Procedure (Supply Chain) which will be finalised in financial year 2026. This procedure will support us to establish the rights, roles, and responsibilities in responding to allegations of human rights violations, including modern slavery, and outlines our process for remediating any adverse impacts.

This procedure will sit alongside existing mechanisms and procedures when finalised, such as our Whistleblowing Policy and Misconduct Investigation Guidelines.

There are two channels available to raise a grievance, an internal complaints process and an anonymous telephone number, which is managed by an independent third-party provider to ensure confidentiality and support anonymous reporting. We may also identify risks or receive allegations through internal due diligence activities, media coverage, or reports from external sources such as law enforcement agencies.

We are committed to investigating all instances of actual or suspected modern slavery. Where an investigation confirms the presence of modern slavery in our supply chain or operations, we will act as outlined in our Misconduct Investigation Guidelines. We also continue to report to our Audit and Risk Committee on a bi-annual basis and support our Risk and Assurance team with their Critical Control Reviews, both ensuring continuing accountability in this space.

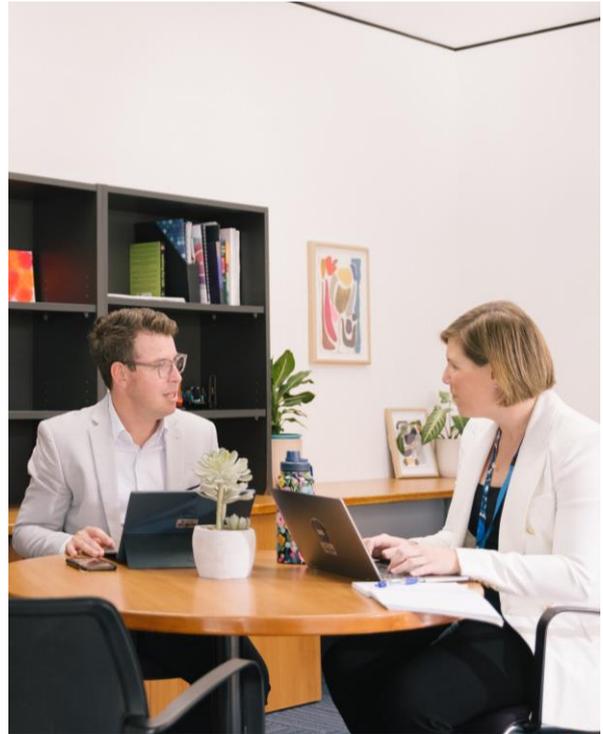
During the reporting period, there were no reports of modern slavery practices through our grievance mechanisms.

## Measuring the effectiveness of our actions

We continue to measure the effectiveness of modern slavery actions through our internal modern slavery reporting, including key performance indicators (KPIs) for managing risks of modern slavery relating to reports of modern slavery, supplier assessment and testing, training, and remediation actions. These support us to measure the effectiveness of our actions and reported to our Audit and Risk Committee on a bi-annual basis.

Our KPIs will continue to evolve as we mature our approach and develop a more robust modern slavery framework. In financial year 2025, we reviewed our KPIs and plan to update these in financial year 2026 by developing an effectiveness measurement framework. This framework will focus on measuring the impact our actions have on stakeholders.

In financial year 2025, we did not identify any modern slavery incidents in our operations or supply chains



*Our Whistleblowing Policy ensures all concerns are thoroughly investigated and addressed with integrity and transparency.*

## Looking ahead: Future reporting period

We continue to focus on improving our approach to identifying, assessing and addressing modern slavery in our operations and supply chains.

Work is ongoing to improve our policies, process and procedures and to upskill our people, so they have the capability to better identify and manage modern slavery risks and impacts.

In financial year 2026, we will focus on the priority actions below.



*We are committed to equipping our employees with training that builds awareness and understanding of modern slavery risks.*

### Priority actions

#### Policies

We will finalise and implement the Supplier Code of Conduct and Human Rights Grievance and Remediation Procedure (Supply Chain) developed in financial year 2025.

#### Training

We will continue to focus on improving the capability of our people. We will conduct training on our Supplier Code of Conduct when it is finalised to support our people to engage with suppliers to set our expectations, including in relation to modern slavery. We will also provide internal training on our new Human Rights Grievance and Remediation Procedure (Supply Chain) when it is finalised to support implementation.

This training builds upon our modern slavery training module introduced during financial year 2024. We remain committed to identifying opportunities to strengthen and invest in our employees' awareness and capability to effectively address modern slavery risks.

#### Modern slavery risk assessment

We will undertake a modern slavery risk assessment to better understand the modern slavery risk profile of our operations and suppliers.

#### Modern slavery due diligence

We will continue to prioritise due diligence activities with higher risk and critical suppliers to improve our understanding of modern slavery risks in our supply chains and how our suppliers are managing those risks.

#### Effectiveness measurement framework

We will develop an effectiveness measurement framework to better understand the impact of our activities to assess and address modern slavery. As part of this effort, we will look to establish a baseline to assist us in better monitoring the effectiveness of our activities in the future.

#### Establish a Human Rights Policy

We will develop a Human Rights Policy to formalise our commitment to respecting and promoting human rights across our operations and supply chain, and to ensure alignment with international standards and best practices.

# 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* (the Act) on 26 November 2025.

## 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 Act. The table below lists the criteria and the sections in our statement that address each.



**Pat Donovan**  
Chief Executive Officer

Reference	<i>Australian Modern Slavery Act 2018</i> (Cth) mandatory reporting requirement	Location of information
<b>s 16(1)(a)</b>	Identify the reporting entity	Modern Slavery Statement Pg. <u>4</u>
<b>s 16(1)(b)</b>	Describe the structure, operations, and supply chains of the reporting entity	About us Pg. <u>4-6</u>
<b>s 16(1)(c)</b>	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	Risks in our operations Pg. <u>8</u> Risks in our supply chain Pg. <u>9-10</u>
<b>s 16(1)(d)</b>	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 risks in our operations Pg. <u>8</u> Managing risks in our supply chain Pg. <u>11-12</u>
<b>s 16(1)(e)</b>	Describe how the reporting entity assesses the effectiveness of such actions	Measuring the effectiveness of our actions Pg. <u>12</u>
<b>s 16(1)(f)</b>	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. <u>4</u>
<b>s 16(1)(g)</b>	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Looking ahead: Future reporting period Pg. <u>13</u>

