



# Modern Slavery Statement

2024

Sydney  
**WATER**

# Letter from the Sydney Water Board of Directors

The Commissioner  
Australian Border Force  
Department of Home Affairs  
22nd October, 2024

It is with great pleasure that we submit Sydney Water’s fifth Modern Slavery Statement to the Department of Home Affairs. This statement, covering the financial year 2023-24, has been written by Sydney Water Corporation (ABN 49 776 225 038) and approved by the Board of Directors at their meeting on 22nd October, 2024.

Sydney Water supports the objectives of the Modern Slavery Act 2018 (Cth) which closely align with our core corporate values. We are strongly committed to taking steps to ensure that our operations and supply chain are free from modern-day slavery practices; that as a business we do not profit from exploitation of others; and that the products and services we deliver to our 5.4 million customers are ethically sourced.

We have published the latest Modern Slavery Statement on our website, and our 2023-24 Annual Report includes a list of activities we have undertaken to demonstrate our deep commitment to ensuring modern slavery practices are reduced and, ultimately, eradicated.



Roch Cheroux, Managing Director

## 1. Who we are

This Modern Slavery Statement is made by Sydney Water Corporation (ABN 49 776 225 038) (Sydney Water) pursuant to the Modern Slavery Act 2018 (Cth) (the Modern Slavery Act) for the 2023–24 financial year. We are a statutory State-Owned Corporation established under the Sydney Water Act 1994 (NSW) and wholly owned by the New South Wales Government. We operate within the state of New South Wales and our head office is located at 2 Parramatta Square, Parramatta NSW.

The main services of Sydney Water are to provide water, recycled water, wastewater and some stormwater services to Sydney, the Illawarra and the Blue Mountains. In addition to these fundamental services, Sydney Water provides associated services, such as sewer service diagrams via the Sydney Water Tap in® service. Sydney Water engages in research and development projects related to the water industry and plays a key role in urban development within its area of operations. Our area of operations covers almost 13,000 km2 of land, extending from the Hawkesbury River in the north to Gerroa in the south and from the Pacific Ocean in the east to Mount Victoria in the Blue Mountains in the west. Within this area we have one head office, one laboratory, 24 wastewater treatment plants, 14 water recycling plants, 153 water pumping stations, 695 wastewater pumping stations, 9 water filtration plants and 12 recycled water pumping stations.

Sydney Water has played an integral role in helping to build the modern city we see today. We are proud of our 130-year heritage and contribution to

Sydney’s liveability which we achieve by focusing on our three principal objectives:

- Protect public health
- Protect the environment
- Be a successful business.

### Our vision

Our vision is creating a better life with world-class water services. Water is an essential part of daily life. It’s the way we use water that helps our city thrive and supports the productivity and prosperity of our economy. By delivering world-class water services, we can create a better life for our customers, our people, our business partners and our communities.

Our vision and strategy respond to a complex and changing operating environment and deliver on customer outcomes:

- Customer experience (Deliver a great customer experience)
- Water Quality and reliability (Provide safe, clean, reliable drinking water every day)
- Environmental Protection (Ensure we protect our waterways and environment now and for the future)

Our investments aim to maintain and improve our services into the future reflecting what matters most to our customers, our stakeholders and the communities we serve.

This Modern Slavery Statement reflects our core values – to work together with integrity and to care for each other and the community.

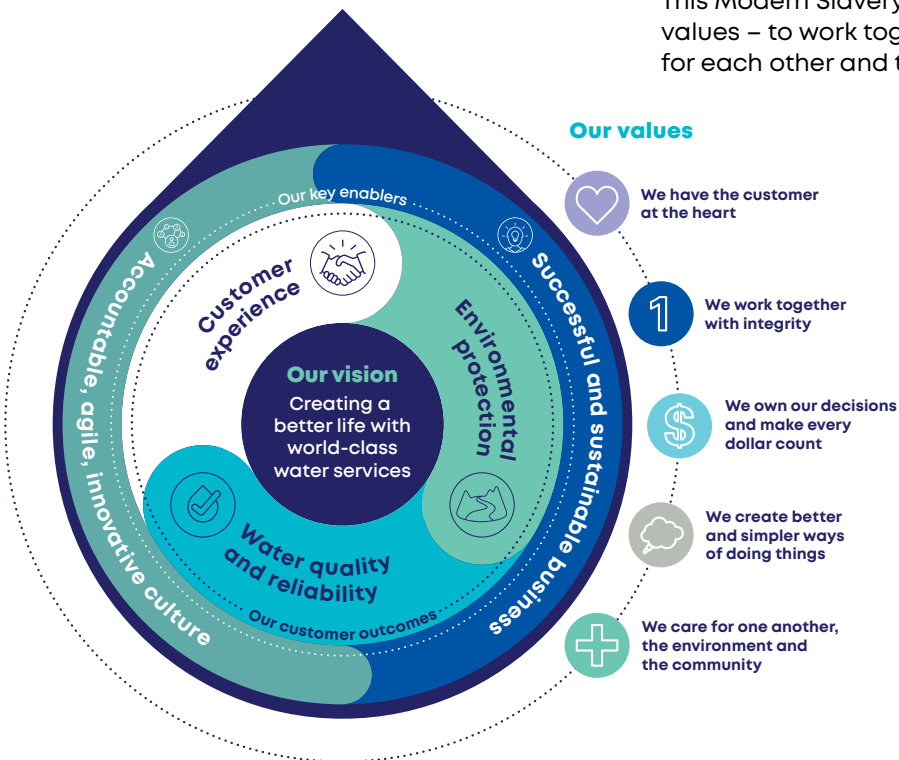


Figure 1.  
Sydney Water  
Strategic Outcomes  
and Values



2. Our structure, operations and supply chains

2.1 What we do

Every day, we supply to 5.4 million people across Sydney, the Blue Mountains and the Illawarra with safe, high-quality drinking water. We also look after wastewater and some stormwater services to help protect the health of our rivers and beaches. We construct, operate, manage and maintain systems and services for:

- Storing and supplying water (including drinking water and recycled water)
- Providing wastewater (sewerage) services and disposing of treated wastewater
- Providing stormwater drainage services in some areas.

We conduct these operations within the area of operations indicated in figure 2.

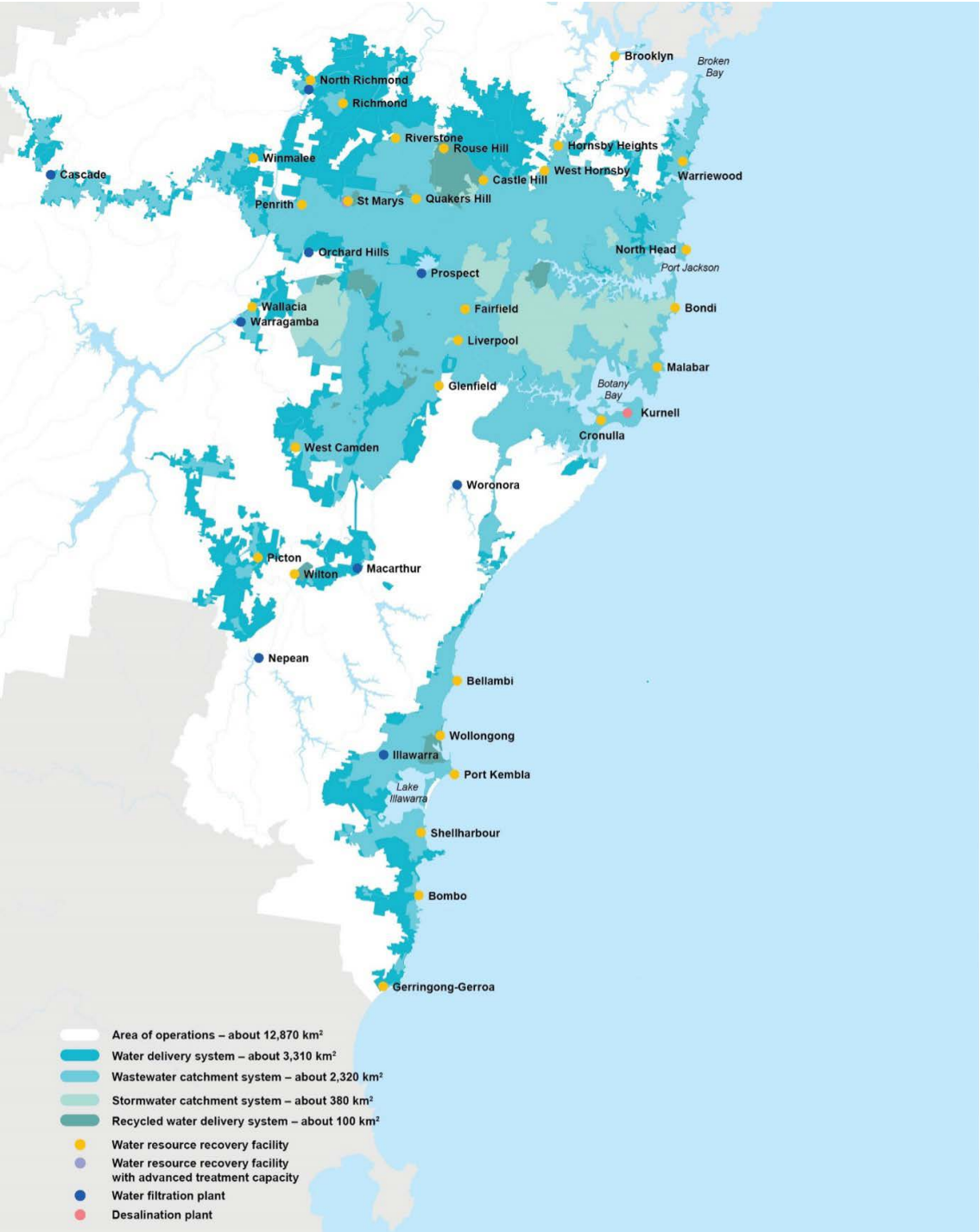


Figure 2. Our areas of operation

2.2 Operations

In 2023-24, Sydney Water employed or engaged:

3,495 Full-time equivalent employees		
3,228 Full-time equivalent permanent	157 Full-time equivalent temporary	110 Full-time equivalent part time
Sydney Water employs people under an enterprise agreement or individual contract of employment to supply the following services:		
<b>Drinking Water</b> Every day, we supply about 1.5 billion litres of safe drinking water to our customers.	About 80% of water comes from Lake Burragorang behind Warragamba Dam and the rest comes from a mix of other dams, the Hawkesbury-Nepean River and Sydney Desalination Plant at Kurnell.	<ul style="list-style-type: none"><li>• We supply water from 11 major dams and through 13 water delivery systems with:</li><li>• 22,864 kilometres of water pipes</li><li>• 9 water filtration plants</li><li>• 252 reservoirs</li><li>• 153 drinking water pumping stations.</li></ul>
<b>Recycled Water</b> Each day, we recycle about 110 million litres of water, treating it so it's safe for its intended use.	Water recycling reduces demand on water supplies. It leaves more water in our dams for drinking, and reduces the amount of wastewater discharged to the environment.	<p>We own and operate:</p> <ul style="list-style-type: none"><li>• 14 water resource recovery facilities</li><li>• 822 kilometres of recycled water mains</li><li>• 9 recycled water reservoirs</li><li>• 12 recycled water pumping stations.</li></ul>
<b>Wastewater</b> We own and operate the wastewater network of Sydney, the Illawarra and the Blue mountains, which services over 5.2 million customers.	Our water resource recovery facilities collect and treat about 1.6 billion litres of wastewater each day before it's reused or released into rivers or the ocean..	<p>We have 24 separate wastewater systems that consist of:</p> <ul style="list-style-type: none"><li>• 26,861 kilometres of wastewater pipes</li><li>• 698 wastewater pumping stations</li><li>• 30 water resource recovery facilities.</li></ul>
<b>Stormwater</b> Managed properly, stormwater is a valuable resource that can enhance cities' liveability, sustainability and resilience.	We do it by working with local government authorities (LGA) to improve health of our waterways, provide opportunities for stormwater reuse and protect our people and properties from flooding.	<p>Our stormwater network provides services to about 634,000 properties which consists of:</p> <ul style="list-style-type: none"><li>• 73 catchments</li><li>• 456 kilometres of channels and pipes</li><li>• over 70 stormwater quality improvement devices.</li></ul>
Our employees and contractors deliver these services through various activities including:		
<b>Managing our Asset Lifecycle</b>  which encompasses planning, developing, designing, building and maintaining network infrastructure.	<b>Delivering our Customer Services and End-to-End Customer Experience</b>  through water supply and production, laboratory services, networks field operations, water resource recovery, retail and business customer relations, billing and revenue collection services and our contact centres.	<b>Operating Equipment and Control Systems</b>  to deliver reliable services to our customers.

2.3 Our supply chain

Supply chain

Sydney Water procures goods and services in accordance with our corporate and procurement policies, processes and procedures. These policies and processes are applicable to all employees and contractors involved in externally obtaining goods, services and any other procurement activities, for or on behalf of Sydney Water. They set out how we plan, source and manage supply agreements and suppliers throughout the procurement lifecycle.

Procurement activities are dependent on business requirements. These can range from purchase orders and purchasing cards for low-risk purchases to formal multimillion-dollar contracts using our “source-to-contract” process for high-risk and high-spend projects.

Our expenditure in the FY24 was in the following categories:

FY24 Total Spend Breakdown by Category	<b>44.27%</b> <b>Construction and works</b> Covering construction project management services, construction services and professional engineering services	<b>5.92%</b> <b>Outsourced Treatment Services</b> Covering outsourced treatment plants and networks, wastewater treatment and water filtration treatment services
	<b>13.52%</b> <b>Water Supply and Testing Services</b> Biggest spend with Sydney Desalination Plant and WaterNSW	<b>5.75%</b> <b>Corporate Services</b> Covering corporate support related expenses such as insurances, legal and management consulting services etc
	<b>10.41%</b> <b>Employee Expenses, Reimbursements and Benefits</b> For the purposes of analysing our supply chain, we have excluded this category.	<b>5.06%</b> <b>Civil Services</b> Covering equipment hire, network repairs and maintenance etc
	<b>15.07%</b> <b>Others</b> Covering information technology, chemicals, maintenance and equipment, utilities etc.	

Sydney Water publishes the details of any [active contract](#) between Sydney Water and a private-sector contractor signed after 1 July 2010 that is above the value of \$150,000 and involves the contractor doing a specific project such as construction, infrastructure or property development, the contractor agreeing to provide specific goods or services, or the transfer or lease of real property.

Geographical distribution of suppliers

More than 99.5% of our total spend was within Australia during the reporting period. The remaining expenditure can be attributed to various international suppliers in countries with a low prevalence of and low to medium vulnerability to, modern slavery. We acknowledge, however, that there is a possibility that the source countries for these goods and services may be countries with a higher prevalence of or vulnerability to modern slavery. The majority of the spend with our international suppliers was in relation to software licenses, maintenance and IT professional services.

Table 1 sets out the modern slavery prevalence and vulnerability scores with respect to the main countries from which Sydney Water procured goods and/or services during the reporting period:

Country	Prevalence (/1,000)	Vulnerability (/100)	Total Spend %
Australia	1.6	6.8	99.85%
UK	1.8	14.3	0.07%
United States	3.3	24.5	0.07%
Netherlands	0.6	6.0	0.004%
Singapore	2.1	24.4	0.003%
New Zealand	1.6	7.8	0.002%
Ireland	1.1	9.3	0.002%
Canada	1.8	10.7	0.001%
Malta**	NA	NA	0.001%
Slovakia	7.7	16	0.0002%

Table 1. Modern Slavery Prevalence and Vulnerability scores in Sydney Water’s Supply Chain based on Global Slavery Index 2023

\*\*No information available for Malta in the Global Slavery Index 2023.





3. Risks of modern slavery practices in our operations and supply chains

Operations

At Sydney Water, approximately 90% of our employees work on full-time equivalent permanent arrangements. Approximately 7% of our workforce are on full-time equivalent temporary arrangements while we have approximately 4% full-time equivalent employees on part time arrangements. We operate entirely in Australia with offices located around Greater Sydney.
















Sydney Water has various policies and instruments in force to address the risks of modern slavery in our operations, some of which have been updated during the reporting period. The relevant policies and instruments in place include:

<b>Remuneration Policy</b> Ensures the remuneration of all employees, permanent, temporary and part-time is managed on a fair and equitable basis and in line with organisational objectives.	<b>Safety, Health, and Wellbeing Policy</b> Aims to create an environment in which people have the autonomy to use their insight, knowledge and expertise to keep themselves, their colleagues and the community safe, healthy and well. This policy applies to all workers including contractors, visitors, customers, partner agencies and others who may be involved in or affected by Sydney Water activities.	<b>Flexible Working Policy</b> Encourages positive physical and mental health, supports people with carer's responsibilities and aims to make Sydney Water a great place to work with high engagement, wellbeing and job satisfaction.
<b>Parental Leave Policy</b> Provides employees with access to parental leave, including paid leave for the birth or adoption of a child into their immediate family.	<b>Overtime Policy</b> Addresses reasonable overtime outside of usual hours of work.	<b>Enterprise Agreement</b> The Terms and Conditions of our Enterprise Agreement provide for limitations on hours of work to ensure rest breaks and minimal fatigue for our workforce.
<b>Fair Treatment</b> Provides a set of principles for resolving grievances where an employee feels they have been dealt with unfairly, discriminated against or dealt with in an unjustified manner.	<b>Sick Leave</b> Protects the health, safety and wellbeing of our employees and members of the community by supporting our employees who are unwell or injured and unable to perform their duties.	<b>The very human story of Sydney Water</b> Covers what we stand for at Sydney Water and what to expect from working at Sydney Water with a clear explanation of our shared commitments and non-negotiables.
<b>Workplace Conduct Policy</b> Defines acceptable conduct and standards of behaviour in the workplace and ensures all employees are treated equitably and are not subjected to discrimination, harassment, bullying or violence.	<b>Wrongdoing Reporting Policy</b> Aims to establish an internal reporting system for staff to report alleged wrongdoing in Sydney Water without fear of reprisal.	

Sydney Water has systems in place to ensure that these policies and instruments are complied with. The risk of modern slavery in our own operations is, therefore, very low.

Supply Chains

Sydney Water has identified the following modern slavery risks in our supply chain:

Categories	Risk Factor	Risk Description
Construction and works	 	Pose a high risk of modern slavery, as the production of these products and the services required rely on multi-tiered construction supply chains that may draw on labour and materials from countries with little regulation, coupled with a high proportion of low skilled, migrant workers from socio-economically vulnerable groups.
Information Technology	 	Includes IT Hardware, IT Network and Infrastructure, IT Services, IT Software and Telecommunication. The Global Slavery Index has labelled laptops, computers and mobile phones imported by Australia from China and Malaysia as the highest value at-risk products for modern slavery, with the Global Slavery Index identifying cases of forced labour in the electronics manufacturing industries in these countries.
Uniforms and Personal Protective Equipment	 	Includes the purchase of uniforms and hard hats as well as hand, body and respiratory protection. We purchase these goods from suppliers that could be sourcing and manufacturing goods from countries overseas with relatively high modern slavery risks.
Catering, event management and venue hire	 	Is another high-risk area of our spend as the hospitality and fresh fruits industries may involve poor working conditions including, but not limited to, wage theft and inadequate record keeping, especially for people on temporary work visas and migrant workers.
Recruitment services	 	May involve recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers. Recruiters may also exercise coercive control by withholding workers' identity documents to limit their freedom of movement and socially isolate them from community or other supports.
Cleaning and hygiene services	 	Is another high-risk category of our spend that could involve workforces with a high proportion of low skilled migrant workers who may have limited English language skills and understanding of rights under Australian law.
<div>KEY  High risk countries  Low skilled, migrant workers  Poor working conditions</div>		

## 4. Actions taken this year to assess and address modern slavery risks

### 4.1 Procurement Framework

Our Procurement Framework sets out the foundation, scope and structure of the procurement process at Sydney Water.

Further information regarding our Procurement Framework and Procurement Policy is detailed in our [Modern Slavery Statement for 2021-22](#).

Procurement processes

As part of our Procurement Framework, we have defined processes across the procurement lifecycle from planning, sourcing and purchasing to managing contracts and suppliers.



Figure 3  
Procurement  
Processes at  
Sydney Water

#### 1. Plan

- As part of the planning stage, we take the opportunity to conduct a risk assessment. The outcome of the risk assessment together with the total value of the procurement is used to work out the most appropriate procurement pathway or market approach. In addition to risk assessments, a procurement strategy may be required for medium or high risk and/or high value procurement activity. The procurement strategy outlines the market analysis and evaluation criteria and procurement staff have the discretion to take modern slavery risks into consideration where appropriate. The procurement strategy is subject to approval in accordance with Sydney Water's delegation manual.

#### 2. Source

- When a tender exercise is conducted, the tender document sets out the requirement for suppliers to supply information in respect of modern slavery to Sydney Water. This includes actions taken to assess and address modern slavery risks and willingness to work with Sydney Water to address the risks.

### 3. Purchase

- As part of our pay process, approval in accordance with our delegation manual is required before a purchase requisition is converted to a purchase order. This approval step exists and is enforced for numerous reasons, including ensuring that the purchase order complies with and meets the objectives set out in the Procurement Policy.
- Our purchase order is governed by Purchase Order Terms and Conditions which cover several aspects of modern slavery including:
  - prohibiting suppliers to engage in any activities, practices or conduct that would constitute an offence under Modern Slavery laws
  - requiring suppliers to thoroughly investigate their labour practices and those of their subcontractors and direct suppliers to ensure that there is not any activities, practices or conduct being engaged in that would constitute an offence under Modern Slavery laws
  - requiring suppliers to put in place all necessary processes, procedures and compliance systems to ensure they comply with Modern Slavery laws.

### 4. Manage Contracts

- Sydney Water's Contract Management Operating Model is designed to enable Sydney Water to manage contracts effectively and consistently across the organisation. Further information regarding our Contract Management Operating Model is set out in our [Modern Slavery Statement for 2021-22](#).
- The Contract Management Operating Model enables Sydney Water to have better visibility over our contract activities, the suppliers we engage with and the practices within the community.
- Sydney Water has also implemented Modern Slavery clauses in our supplier contracts. These clauses include requirements that the supplier:
  - not engage in activities and practices that would constitute an offence under Modern Slavery laws inside or outside of Australia
  - comply with obligations under the Modern Slavery laws and equivalent legislation
  - implement processes, procedures and compliance systems to ensure compliance with Modern Slavery laws
  - provide information to enable Sydney Water to comply with its own Modern Slavery requirements.

### 5. Manage Suppliers

As part of our supplier management process, we continue to undertake the following processes:

- Supplier due diligence**
  - Sydney Water engages a third-party provider to conduct due diligence on our suppliers. The due diligence process provides information on the location of the supplier, its controlling entity and any legal action pending against the supplier or its directors.
- Supplier registration**
  - For any supplier to transact with Sydney Water, they must complete our supplier registration process to create their profile on our Procurement system. As part of the registration process, suppliers are required to confirm that they have read, understood and agree to comply with the Modern Slavery Act. Non-compliance is subject to review by the procurement team and may result in a supplier's registration being denied. In addition, suppliers are also required to confirm that they have read, understood and comply with Sydney Water's Supplier Code of Conduct which includes Sydney Water's expectations with respect to modern slavery, labour and human rights.
- Supplier prequalification**
  - We have implemented a supplier prequalification process where suppliers are required to confirm and prove that they meet Sydney Water's minimum requirements. As part of the process, we ask suppliers to confirm if they have a Modern Slavery Policy or program in place and where possible, to provide evidence to substantiate their claim.



4.2 Risk Monitoring and Remediation processes




- We monitor the modern slavery risks in our existing supply chain by;
- monitoring news and market updates that may involve modern slavery incidents with suppliers that we are currently using or in our database
  - including modern slavery as part of corruption hotline triage and reporting. The [corruption hotline](#) is publicly available on our website.

Once we identify a modern slavery risk or incident, we would then apply a remediation process depending on the source of the risk or incident identification. The remediation process can be one of the following:

- If the risk or incident is identified through a news or market update or the corruption hotline, Sydney Water will take steps to engage with internal stakeholders and the supplier to mitigate the risk or resolve the incident, in accordance with its various processes including those set out in its Supplier Profiling and Due Diligence Framework, Wrongdoing Reporting and Assurance Management. Refer to our Modern Slavery Statement for 2022-23 for a case study of a case lodged in a US court alleging a well-known global company knowingly profited from modern-day slavery.
- If the risk is identified through pre-contract award risk assessment, the responsible purchasing officer will be required to conduct further inquiries into the supplier's practices and operations regarding modern slavery, to determine the impact of the risk identified on the contractual relationship going forward.



4.3 Actions taken this reporting period to address modern slavery risks

 Collaboration with water companies across Australia	 Online solution to manage modern slavery risks	 Engagement with office of the NSW anti-slavery commissioner
We continued our active engagement with other water companies across Australia to share best practices, discuss common issues, current legislation and standardise our approaches.	We implemented an online Modern Slavery Platform to capture, evaluate and manage modern slavery risks from our suppliers.	We engaged with the Office of the NSW Anti-slavery Commissioner to discuss our due diligence and reporting obligations for modern slavery under NSW legislation.

1. Collaboration with water companies across Australia

- Last year, we began a process of engagement and collaboration with other water companies across Australia through the Water Services Association of Australia (WSAA). This year, we continued to actively engage in modern slavery community of practice (COP) with these companies. In doing so, our main focus was to firm up the modern slavery questionnaires used in the Modern Slavery Platform online tool that we implemented this year, a tool which is also used by other water companies. In addition, we discussed and agreed on standard risk scoring system used to analyse and determine the risk rating of suppliers' answers to the questionnaires. Further details on the Modern Slavery Platform online tool, questionnaires and risk scoring system are discussed in the next section.
- This year, Sydney Water hosted the WSAA Modern Slavery COP's meeting at our office, attended by representatives from other water companies across Australia. The main objectives of the meeting were to:
  - Understand the international landscape regarding modern slavery;
  - Understand the national legislative context;
  - Understand the key issues relating to modern slavery for each water business;
  - Understand the perspectives from victims and suppliers;
  - Learn about the modern slavery journey of key water companies;
  - Work through the risk register approach of different water utilities;
  - Confirm that further discussions would occur with Informed 365, our Modern Slavery Platform online tool provider.
- Several external guest speakers were invited to the meeting to share updates, trends, best practices and other modern slavery aspects including those from the Modern Slavery and Human Trafficking branch of the Attorney-General's Department, a modern slavery survivor and a major construction company.

## 2. Implementation of Modern Slavery Platform online tool

- As a result of the sourcing activity that WSAA coordinated last year to find an online platform to efficiently identify, assess and manage modern slavery risks, we and other water companies selected Informed 365 as our platform provider (please refer to our Modern Slavery Statement for 2022-23 for more details on the sourcing activity conducted by WSAA and water companies). Informed 365 is an Australian based ESG market leader for industry wide consortia with their Australian-first launch of an industry shared modern slavery platform with the Property Council of Australia.
- This year, we focused on close engagement with Informed 365 to come up with the best framework for the implementation of the tool to meet our needs and requirements. We also actively engaged with other water companies across Australia using the same platform to standardise our approach in using the tool and to further refine the questions we developed last year used to assess suppliers' modern slavery risks. In coordination with WSAA, Informed 365 and other water companies, we also focused on developing a standard scoring system embedded in the tool to assess and rank suppliers' responses to the modern slavery questions. It is our intention to start working on integration of this tool with our processes and reporting.

### Case Study - Modern Slavery Platform Online Tool:

We, along with other water companies across Australia, selected Informed 365 as our preferred partner to implement a modern slavery platform online tool to assess and manage modern slavery risks in our supply chain for the purposes of the Modern Slavery Act (2018).

The main intention behind the tool is to have a single online platform accessible by all participating water companies with access to a common supplier database, supplier risk assessment and risk rating.

#### The online tool is developed to:

- Support the identification of modern slavery risks and areas for further investigation;
- Help collaboration between suppliers and organisations to address these risks;
- Improve transparency.

#### The online tool focuses on 4 main areas of assessment of suppliers:

- About the organisation, assessing their organisation and the industry or sector in which they operate, including whether the company has operational sites outside of Australia, annual revenue etc.;
- Governance & Control, including whether the company has established policies, procedures or other documents covering issues such as whistle-blowing, child and forced labour, migrant workers, labour relations, human resources etc.;
- Operations & Supply Chains, including how much visibility the company has over their supply chain, including whether their suppliers operate in the locations where people have a higher vulnerability to modern slavery, whether the company produces or provides either goods or services known to have a high risk of modern slavery etc.;
- Employment Conditions, including whether the company conducts checks to ensure all employees are above the minimum age of work, whether employees are free to lawfully resign without restriction or penalty, etc..

Invited suppliers can access the platform free-of-charge and can elect to share their answers to all water companies using the tool, thus maximising the automation of data collection from suppliers, avoiding undue repetition and rework by suppliers and increasing transparency within participating water companies using the same suppliers.

## 3. Engagement with Office of the NSW Anti-slavery Commissioner

In December 2023, the Office of the NSW Anti-slavery Commissioner published Guidance on Reasonable Steps (GRS) to manage modern slavery risks in operations and supply chains. The GRS describes itself as a guide to assist New South Wales public entities in “applying clear policies, consistent procedures and effective risk management strategies for modern slavery risks in their operations and supply-chains” and is accompanied by good practice examples, tools and resources. More information about the GRS and other framework developed by the Commissioner can be found on their [website](#).

Since the introduction of the GRS, we have reached out to the Office of the NSW Anti-slavery Commissioner to obtain a better understanding of, and most effectively align with their initiatives, including attending a webinar organised by the Commissioner for NSW State-owned corporations to discuss GRS's requirements, arranging a face-to-face meeting with the Commissioner and his team to discuss in detail the new GRS annual reporting requirements, GRS Inherent Risk Identification Tool (IRIT) and other modern slavery related subjects.

It is our intention next year to further deep dive into the GRS, IRIT and other tools developed by the Office of the Anti-slavery Commissioner, to align as much as possible with their guidance in our supply chain processes.

## 5. How we assess the effectiveness of our actions

Sydney Water applies an assurance management process to review and manage modern slavery risks which is coordinated through the three lines of assurance (3LOA) model. These are:

- Line 1 - Management control – assurance activities done at a local level, e.g. inspection and monitoring or project/contract audits. These are completed at an operational level by relevant subject matter experts or those who can verify technical controls are in place and working, e.g. team leaders, technicians or inspectors.
- Line 2 - Management oversight – assurance activities such as management system audits on the delivery of our products, processes and services. External parties and certification bodies engaged by Management Systems teams complete audit forms as part of our 2LOA. These programs are based on risk and provide insights on how well work is being done within set strategies, policies, procedures and compliance obligations.
- Line 3 - Independent oversight – assurance activities completed by the Internal Audit Team, including contractors, with an independent and objective view.

To ensure we are effectively managing modern-slavery risks in our supply chain, Sydney Water:

- monitors the modern slavery awareness training participation rate across the Procurement team. We continuously communicate the need to complete the training, especially to new hires, through various communication channels, including newsletters and team meetings
- monitors a supplier's confirmation of their compliance with the Modern Slavery Act 2018 (Cth) prior to the onboarding confirmation
- monitors the supplier-prequalification approval rate. The pre-qualification approval takes into consideration whether suppliers have approved policies and procedures that outline their approach to mitigate and report on Modern Slavery in their operations and supply chain
- continually assesses our engagement processes with suppliers
- monitors a fit-for-purpose, centralised mailbox for anonymous reporting of modern-slavery incidents
- if made aware of any supplier that may be subject to a modern- slavery risk or incident within their operations or supply chain, will contact the supplier for further information, and take responsive action where appropriate.



## 6. Consultation

Sydney Water does not own or control any other entities, form part of any other trading entity or engage in joint ventures. As such, Sydney Water does not engage in any process of consultation with any other entities in respect of its Modern Slavery Statement.

## 7. Other relevant information

The Modern Slavery Act 2018 (NSW) (NSW MS Act) places the following further obligations on Sydney Water:

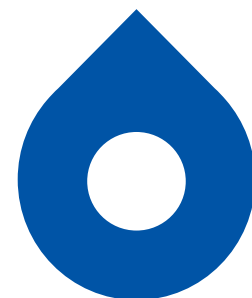
- a statement to be included in the Sydney Water Annual Report on the steps taken to ensure goods and services procured were not the product of modern slavery and addressing any issues raised by the Anti-slavery Commissioner
- annual publication of the Modern Slavery Statement on our website
- provide the Anti-slavery Commissioner with written notice that the Modern Slavery Statement has been published on our website.

We include a Modern Slavery section that addresses the NSW MS Act requirement in the Sydney Water Annual Report.

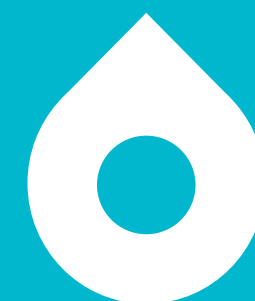
Additionally, we shared data directly with the Office of the NSW Anti-slavery Commissioner using the GRS Annual Reporting online form.

## 8. Approval and signature

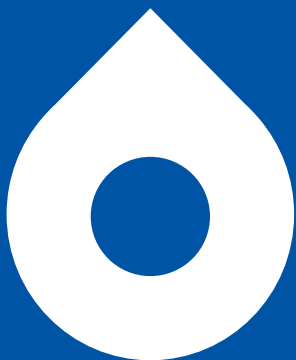
This Modern Slavery Statement was approved by the Sydney Water Board of Directors in their capacity as principal governing body of Sydney Water at their 22 October meeting, and is signed by Roch Cheroux, Managing Director on the first page of this statement.











### **Contact us**

Call us on 13 20 92

Write to us at Sydney Water PO Box 399, Parramatta NSW 2124

Report a leak or fault on 13 20 90

Visit us online at [sydneywater.com.au](https://sydneywater.com.au)

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