

# Modern Slavery Statement FY24

September  
2024



## About this Statement

The Queensland Bulk Water Supply Authority (trading as Seqwater) (Seqwater) ABN 75 450 239 876 has prepared this Modern Slavery Statement (Statement) under the *Australian Modern Slavery Act 2018 (Cth) (the Modern Slavery Act)*.

This Statement describes the steps undertaken by Seqwater to assess and address the risks of modern slavery in our operations and supply chain for the financial year dated 1 July 2023 – 30 June 2024 (FY24) (the Reporting Period), and our future commitment to move beyond evaluating our strategy on modern slavery risks, to initiating actions that embody our strategy and foundations.

This Statement covers the seven mandatory reporting criteria under the Modern Slavery Act. The table below indicates where within this Statement each criterion is addressed.

Further information about Seqwater, including our Strategic and Operational plans, Annual Report and Corporate Government Statement is available on our Corporate Publications page at <https://www.seqwater.com.au/corporate-publications>.

Mandatory reporting criteria	Section
Identify the reporting entity	This page
Describe the reporting entity's structure, operations and supply chains	Page 4 – 5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 6 – 7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Page 8 – 9
Describe how the reporting entity assesses the effectiveness of these actions	Page 10
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 11
Any other relevant information	N/A

Seqwater acknowledges the Traditional Owners of these waters and surrounding lands and recognises their continued connection to the land, waters and community. We pay our respects to them and their cultures and to elders both past and present.

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# 1 Our organisation

The Queensland Bulk Water Supply Authority (trading as Seqwater) is a statutory authority established by the Queensland Government under the *South East Queensland Water (Restructuring) Act 2007 (Qld)*.

Seqwater is a statutory body for the purposes of the *Financial Accountability Act 2009 (Qld)* and the *Statutory Bodies Financial Arrangements Act 1982 (Qld)* and complies with the Bulk Water Supply Code and Bulk Water Supply Agreements.

While Seqwater is not a Queensland Government Owned Corporation (GOC), it has a statutory mandate to act commercially and has been directed by its responsible Ministers to comply as far as practicable with all Queensland Government GOC policies and directives.

Our statutory functions are summarised as:

- delivering safe, sustainable and valued bulk water supply to more than three million people across South East Queensland;
- providing essential flood mitigation services;
- managing catchment health and offering community recreation facilities; and
- providing water for irrigation to about 1,200 irrigators and industry across seven water supply schemes.

Water is fundamental to public health. A secure bulk water supply that is safe, affordable and reliable sustains communities and underpins future prosperity in the region. We are committed to our vision of Water for Life, and our promise of Safe for Life, and to working with all stakeholders to deliver this essential service in a way that aligns with community views and values.

## 1.1 Structure

Based in Ipswich, Queensland, Seqwater has a Board of six independent non-executive members appointed by the Queensland Government. The Board is accountable to two responsible Ministers for our performance and how we exercise our powers under the *South East Queensland Water (Restructuring) Act 2007 (Qld)*, the *Financial Accountability Act 2009 (Qld)* and the *Statutory Bodies Financial Arrangements Act 1982 (Qld)*. The Board directs and monitors our affairs on behalf of the responsible Ministers and is accountable for our overall corporate governance.

In addition, the responsible Ministers may issue a Statement of Obligations to further outline the overarching obligations of Seqwater, and may, in exceptional circumstances, and if in the public interest, issue the Board with written directions.

The Board is supported by a Chief Executive Officer and seven executive General Managers who are respectively responsible for leading their functional business groups. We do not own or control any other entities.

## 1.2 Operations

We manage up to \$11 billion of bulk water supply infrastructure, including the South East Queensland Water Grid and the natural catchments of the region's water supply sources. These water supply assets include 73,000+ hectares of catchment land, dams and weirs, conventional water treatment plants and climate resilient sources of water through the Gold Coast Desalination Plant and the Western Corridor Recycled Water Scheme, reservoirs, pump stations and more than 600 kilometres of bi-directional pipeline network.

We source, store, treat and supply bulk treated drinking water to five retailer customers, who in-turn deliver drinking water to consumers through their distribution networks. In addition to urban bulk water supply, we supply irrigation water to around 1,200 customers through seven irrigation water supply schemes, with arrangements in place to supply water to Toowoomba and Gympie regional councils, power stations operated by Stanwell Corporation and CleanCo. We also provide access to diverse recreation opportunities on many of our land and water storages.

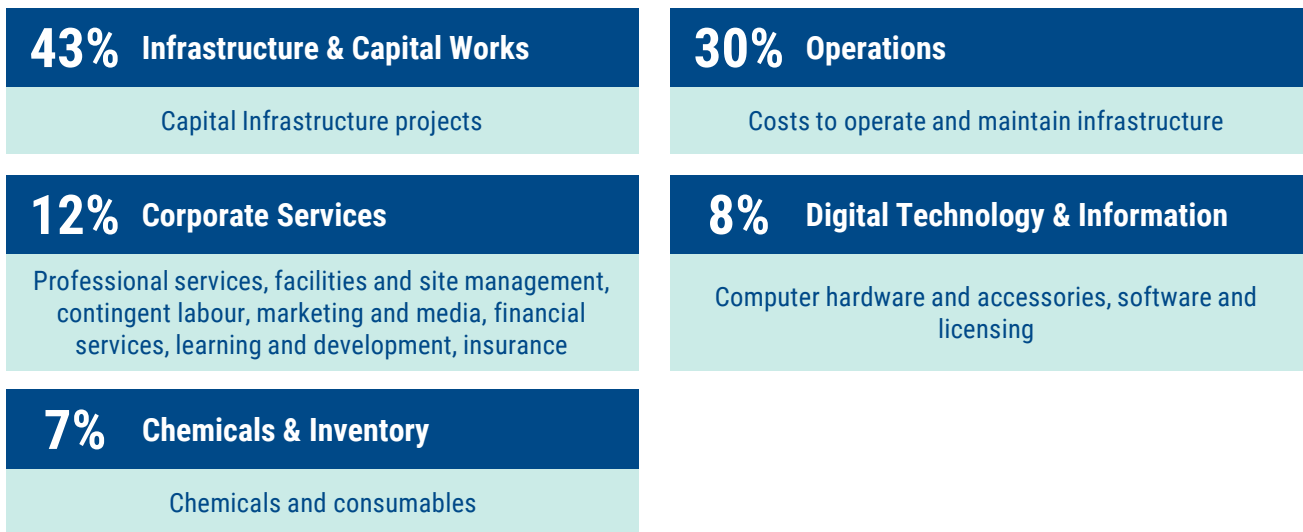
During the Reporting Period we employed over 800 employees under the terms of our Enterprise Bargaining Agreement, and individual Common Law contracts. In addition, we engaged workers through contracts, collaborative agreements, and labour hire with candidates sourced through agencies compliant with the *Labour Hire Licensing Act 2017 (Qld)*.

Our *Safe for Life* promise reflects our commitment to protecting the health and wellbeing of everybody who works for and on our behalf and our Health, Safety and Wellbeing Policy and related framework and strategy commits to our *Safe for Life* promise and sets out how we will achieve this promise. We actively encourage constructive working relationships with employees, delegates and the unions that are party to our enterprise agreement.

### 1.3 Supply chain

We work with many suppliers to provide goods and services to support the delivery of our business objectives. We recognise that there are modern slavery risks across the goods and services we purchase and are committed to monitoring our supply chains to identify and address risks in an appropriate manner.

Our major categories of procurement spend to support our capital projects and core operational functions include:



We maintained a supply base of 1,264 suppliers during the Reporting Period. Where possible we source Queensland- and Australian-based suppliers in compliance with the Queensland Government’s Queensland Procurement Strategy 2023 and the Queensland Procurement Policy 2023. Approximately 99.7% of our FY24 Tier 1 supplier spend was with suppliers located in Australia. The remaining 0.3% is attributed to a total of 28 overseas Tier 1 suppliers located across 9 countries as detailed below:

- North America: IT software services and licenses plus engineering services from United States & Canada
- Asia Pacific: Software services, online subscriptions and consultancies from China, Japan, New Zealand & Singapore
- Europe: Software services and consultancies from Ireland, Netherlands & United Kingdom

## 2 Understanding our modern slavery risks

### 2.1 Defining ‘modern slavery’

We understand the term ‘modern slavery’ to include:




- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage, and
- The worst forms of child labour

Seqwater understands modern slavery risks refer to the potential adverse harm to people that a business can have across its operations and supply chain.

### 2.2 Identifying modern slavery risks

We acknowledge that there are inherent risks within our business that need to be addressed as part of our responsibility to respect human rights. As part of our preparation of this Statement, we started to work with human rights specialists in August and September 2024 (i.e., after the Reporting Period) to identify key areas of inherent modern slavery risk across our operations and supply chain. Seqwater identified several areas of high risk / high priority operations and supply chain areas in which Seqwater could potentially cause, contribute, or be directly linked to modern slavery risks. We acknowledge that these identified inherent areas of modern slavery risk were present in our business during the Reporting Period.

**The following four inherent risk indicators were considered as part of this inherent risk identification process:**

 <p><b>Vulnerable populations</b></p>	 <p><b>High-risk sectors</b></p>	 <p><b>High-risk geographies</b></p>	 <p><b>High-risk business models</b></p>
<p>People and communities that are inherently more vulnerable than others to experiencing modern slavery and its impacts. Migrant workers, women, children and young people are examples of vulnerable populations.</p>	<p>Certain sectors and categories are more likely to contribute to modern slavery due to prevalent labour rights issues throughout the value chain. Examples include manual and intensive labour.</p>	<p>Modern slavery is more likely to occur in countries or regions without legal protection of human rights, high political or social unrest and high vulnerability to corruption.</p>	<p>Organisations with heavy reliance on sub-contractors, labour hire agencies or short-term labour who have limited visibility of these arrangements.</p>

These indicators were analysed across our operations and supply chain to identify potential modern slavery risks and areas where the indicators may intersect and therefore increase the possibility of actual harm being experienced. From this analysis, we identified areas of high inherent risk in our operations and supply chain (see page 7).

## 2.3 Our modern slavery risk areas

Areas identified as having high modern slavery inherent risk in our operations and supply chains are set out below, alongside a summary of the inherent risks identified.



### Information and Communication Technology (ICT)

ICT hardware is a well-documented high-risk category for modern slavery, due to deeply entrenched issues with excessive overtime, worker-paid recruitment fees and controlling/withholding of personal documentation (i.e. passports). Additionally, the use of child and forced labour have been reported in the mining of raw materials used to make ICT hardware. The raw materials used in ICT hardware such as cobalt (used in most ICT hardware) is mined predominantly from the high-risk geography of the Democratic Republic of Congo (the DRC).



### Apparel and Personal Protective Equipment (PPE)

The PPE and related garments and textiles industries, particularly those manufactured in high-risk geographies including Indonesia, Bangladesh and China, are considered to have a high risk of modern slavery. This is due to widely reported issues with poor working conditions, exploitative labour practices and dependence on the use of vulnerable populations including young women and migrant labour.



### Construction services & materials

Construction is considered a high-risk category due to intersecting structural and contextual factors, such as an increased demand for low-skilled labour force, poor visibility over complex supply chains and low-tier suppliers operating in high-risk geographies. The raw materials within the construction supply chain such as concrete, rubber, timber and metals are often sourced from remote and conflict-prone geographies where labour related practices such as child labour and forced labour are common.



### Property Management

Property management includes the procuring of cleaning and security services. These services are considered as high-risk categories for the use of vulnerable populations, particularly migrant workers whose immigration status may be precarious or where workers have limited knowledge or ability to access workplace rights and pathways to address exploitation. Additionally, subcontracting and complex supply chain structures provides limited visibility on working conditions and any potential exploitation.



### Labour-hire

Inherent modern slavery risks for labour-hire services may vary based on the role and services that are being required. For services that are performed by predominately base skill workforces, there is also the potential intersection with vulnerable workforces including women and migrant workers. Additionally, one of the biggest modern slavery risks around labour and recruitment is the use of third-party labour hire contractors, many of whom remain unregulated. Subcontracting and increased complexity of business models can also limit visibility and oversight of working conditions and any potential exploitation.



### Chemicals

Vulnerable workers may be present across the chemical supply chain from extraction to processing. There are also well-documented risks of child labour at the extractive tier of chemical supply chains. Additionally, the mining and processing of chemicals such as fluoride commonly occur in higher risk geographies including Mongolia, Mexico, Malaysia and China.



## 3 Our actions to assess and address modern slavery risks

### 3.1 Commitments and policy

Seqwater uses an internal Code of Conduct Policy to outline the ethics and integrity expectations of our employees. The Code of Conduct includes a commitment to make decisions and act in a respectful manner that upholds the human rights of our employees, the communities in which we work, those in our supply chain, and consultants and contractors. We also use the Queensland Supplier Code of Conduct to uphold ethical, environmental and social responsibilities of our suppliers, which includes managing and addressing modern slavery risks. During the Reporting Period Seqwater also updated our external website to communicate our modern slavery expectations of suppliers and provide the Queensland Supplier Code of Conduct on our website.

Further, during the Reporting Period Seqwater finalised a high-level draft of a Modern Slavery Response Protocol. This protocol defines Seqwater's requirements to report any suspicion of, or actual, modern slavery exploitation, outlines key responsibilities and communicates avenues through which workers can report suspicion of modern slavery.

### 3.2 Stakeholder engagement

Seqwater is proud to report our continued efforts to engage with stakeholders on modern slavery. During the Reporting Period Seqwater continued to engage with the WSAA. Through this involvement we joined a WSAA-led Consortium of peers to access 'Informed 365', a third-party software platform to manage supplier modern slavery due diligence and risk activities. Seqwater also continues to engage and meet quarterly with the Queensland Government Modern Slavery Community of Practice.

Seqwater has also continued engagement with Anti-Slavery Australia as a critical friend alliance. Anti-Slavery Australia continues to provide specialist support and guidance for our modern slavery approach and assisted Seqwater in the trialling of a supplier pilot program.

### 3.3 Accountabilities and governance

The Seqwater Board has overall responsibility and sign-off of our modern slavery statement and compliance with legislative requirements under the Modern Slavery Act. Modern slavery as an internal responsibility currently sits within the Commercial Services (Procurement) Team. As Seqwater continues to develop its modern slavery risk management approach we will endeavour to formalise the governance structure of key roles who have modern slavery responsibilities.



#### Engaging with our peers to support continuous improvement

Seqwater is a Member of the Modern Slavery Working Group within the WSAA (Water Services Association of Australia). This working group meets monthly and engages with modern slavery subject matter experts to build knowledge and formulate collaborative solutions including an industry-wide approach to modern slavery compliance. During the Reporting Period the WSAA-led group engaged a third-party software solution platform, Informed 365, for supplier due diligence and modern slavery risk related activities. Inform365 provides a platform containing water industry supplier responses to a modern slavery questionnaire that was jointly formulated and provides risk assessments on the suppliers based on inherent risk and their questionnaire responses.

Seqwater intends to make greater use of this platform in its supplier Modern Slavery risk assessments.





### Uniform procurement pilot program

During the Reporting Period Seqwater identified uniforms as an area with high inherent modern slavery risks which required further due diligence. Subsequently, we ran a pilot program to procure uniforms with additional modern slavery due diligence steps. The pilot involved the development of a questionnaire with Anti-Slavery Australia that was then sent to potential suppliers. Anti-Slavery Australia then supported Seqwater with providing evaluations and engaging with suppliers for clarifications on the responses received. **From this process a suitable uniform supplier was selected alongside greater confidence that our modern slavery risks for these products would be appropriately mitigated and addressed.** Seqwater intends to use this pilot as a basis to form how we engage with suppliers, particularly in categories of higher inherent modern slavery risk, going forward.

### 3.4 Risk assessment

During the Reporting Period Seqwater conducted a pilot program of integrating additional due diligence activities for the procurement of a new uniform partner (see case study). This pilot program was developed after Seqwater identified uniforms as an area with higher inherent modern slavery risks. As we continue to mature our procurement risk management processes, our intention is to integrate modern slavery risk considerations, particularly when procuring goods or services with higher modern slavery risks.

In preparation for this Statement Seqwater engaged external human rights specialists to provide Seqwater support in identifying the inherent modern slavery risk areas across our operations and supply chain (as described in Section 4 – Understanding of modern slavery risks).

This engagement also included the development of a modern slavery action roadmap to assist Seqwater with the prioritisation of our residual modern slavery risks. As Seqwater continues to mature our modern slavery risk management approach, we intend to annually review and refresh the identified inherent high-risk areas to ensure we are appropriately identifying new or emerging risks and changes to spend and operations (see Section 8 – Planned next steps).

### 3.5 Capability building

During this Reporting Period Seqwater continued to provide modern slavery-based training during the induction of employees with modern slavery responsibilities. This training targeted roles in procurement, legal services and the program management office.

We recognise that further modern slavery training and awareness activities are required to enhance Seqwater's modern slavery approach and capability across different levels and roles within the business. Seqwater has identified capability building as a key focus area for our ongoing modern slavery risk management approach (see Section 8 – Planned next steps) and we look forward to reporting on progress made within this space.

### 3.6 Grievance mechanisms and remediation

Seqwater's Public Interest Disclosure and Whistleblowers Policy is publicly available online and applies to Seqwater workers, suppliers, consultants and contractors. This policy provides channels for reporting suspected misconduct, unethical behaviour and public interest disclosures, which can be reported by members of the public as well as Seqwater stakeholders. Internally, employees are also governed by the Modern Slavery Response Protocol, which outlines channels for reporting suspicion of, or instances of modern slavery.

Seqwater recognises that having accessible and effective grievance mechanisms and remediation avenues is an essential element to encourage our people to raise modern slavery concerns. Seqwater is committed to reviewing and updating our existing grievance mechanisms to strengthen alignment with the *United Nations Guiding Principles (UNGPs)* (see Section 8 – Planned next steps).

## 4 Assessing our effectiveness

**Seqwater is in the early stages of establishing a formalised framework to evaluate and assess the effectiveness of our modern slavery risk management approach. We recognise the importance of developing a framework to adequately assess our previous and planned actions, especially as we continue to strengthen modern slavery risk management systems and controls across Seqwater's operations and supply chains.**

Throughout the Reporting Period we have remained a member of the Water Services Association of Australia (WSAA) Consortium and continued to work with Anti-Slavery Australia. Our ongoing involvement in the WSAA Consortium and our work with Anti-Slavery Australia has continued to uplift Seqwater's ability to assess our effectiveness, incorporate lessons from peers and contribute to a collective community whilst we mature our modern slavery risk management approach.

In preparation for the Reporting Period, we engaged external modern slavery specialists to develop a roadmap for Seqwater's modern slavery approach, which includes the development and implementation of effectiveness indicators to track the progress and impact of Seqwater's modern slavery risk management activities. As Seqwater continues towards better practice, we will look to implement this roadmap and measuring effectiveness actions to provide clear, measurable targets with which our ongoing modern slavery due diligence approach can be assessed.



## 5 Consultation and approval

### 5.1 Consultation with associated entities

Seqwater does not have any wholly owned subsidiaries or entities it controls. As a statutory authority established by the Queensland Government, we are committed to conversation with the Queensland Government on our modern slavery due diligence approach and regulatory requirements.

## 6 Planned next steps

**Seqwater is proud of the actions we have already achieved to strengthen our modern slavery risk management approach. As we continue this journey, we acknowledge the commitment and resources required to continue addressing human rights within our business more broadly.**

In preparation for this report, we worked with external modern slavery specialists to develop a roadmap of actions over the next three years to guide Seqwater's commitment to continuous improvement and addressing modern slavery risks across our business.

**We are committed to the following key actions for our next Reporting Period of financial year 1 July 2024 – 30 June 2025:**



We will look to take further steps to enhance and evolve our annual inherent risk analysis. This will build on the risk analysis recently completed in preparation for this report. Our annual inherent risk analysis will aim to identify new or emerging risks and new areas of spend or operational changes. Further, our planned procurement category strategy and uplift activities will further support our ability to map and trace our procurement activities and supply chain.



We will continue to define and operationalise modern slavery risk management related responsibilities. This includes taking steps to ensure adequate budget and resourcing for those with modern slavery responsibilities.



We will uplift modern slavery training and awareness across Seqwater. This action will focus on building organisational awareness and understanding by updating our current modern slavery training.



We will review and update existing grievance policies and processes to strengthen accessibility and adequacy in identifying and responding to modern slavery related issues. We acknowledge that as we enhance our modern slavery due diligence approach, we need to have accessible grievance mechanisms to respond to suspected or actual instances of modern slavery, should they arise. Uplifting our existing grievance policies and processes will focus on alignment with the UNGPs and ensuring that grievance mechanisms and pathways adequately contemplate modern slavery grievances.



## 7 Board approval

### Principal Governing body approval

This Statement was approved by the Seqwater Board as the Principal Governing body of the Queensland Bulk Water Supply Authority (trading as Seqwater) (Seqwater) ABN 75 450 239 876 as defined by the Act on 21 November 2024.

### Signature of Responsible Member

This Statement is signed by Seqwater's Chairperson, as authorised by the Seqwater Board, as a Responsible Member of the Queensland Bulk Water Supply Authority (trading as Seqwater) (Seqwater) ABN 75 450 239 876 as defined by the Act on 21 November 2024.



Hon. Dr Anthony Lynham  
Seqwater Chairperson





