

Modern Slavery Statement FY25

November
2025

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 2024 – 30 June 2025 (FY25) (the Reporting Period), and our future commitment to 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

Seqwater is a commercial statutory authority of the Queensland Government, established by the South East Queensland Water (Restructuring) Act 2007 (Qld), 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.

Our statutory functions are summarised as:

- delivering safe, secure and cost-effective 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 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 seven 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 six 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 68,000+ 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, and 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, setting 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.

During the Reporting Period, our major categories of procurement spend to support our capital projects and core operational functions included:

- **Infrastructure and Capital Works:** Capital infrastructure projects - 40%
- **Operations:** Costs to operate and maintain infrastructure - 32%
- **Corporate Services:** Professional services, facilities and site management, contingent labour, marketing and media, financial services, learning and development, insurance - 15%
- **Digital Technology & Information:** Computer hardware and accessories, software and licensing - 7%
- **Chemicals and Inventory** - 6%

We maintained a supply base of 1,302 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 99.6% of our FY25 Tier 1 supplier spend was with suppliers located in Australia. The remaining 0.4% is attributed to a total of 30 overseas Tier 1 suppliers located across 10 countries as detailed below:

- **North America:** IT software services and licences plus consultancies and engineering services from the United States & Canada
- **Asia Pacific:** Software services, online subscriptions and consultancies from China, Japan, New Zealand & Singapore
- **Europe:** Software services and consultancies from Italy, Ireland, Netherlands & the 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 organisation that need to be addressed as part of our responsibility to respect human rights. In FY24, we worked with human rights specialists to identify key areas of inherent modern slavery risk across our operations and supply chain. We identified several areas of high risk / high priority operations and supply chain areas in which we could potentially cause, contribute, or be directly linked to modern slavery risks. The inherent areas of modern slavery risk identified in FY24 were also present in our organisation during the FY25 Reporting Period. No new areas of operations or categories of spend were introduced during FY25. During FY25, we developed a Modern Slavery Dashboard available to the Procurement Team, to raise awareness of our inherent modern slavery risks at the category level and support next steps in risk management (see Section 3).

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

 Vulnerable populations	 High-risk sectors	 High-risk geographies	 High-risk business models
<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>

Based on the analysis of the existence of these risk indicators across our operations and supply chain, we identified the key areas of high inherent risk for our organisation (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).



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.



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.



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 predominantly 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.



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.



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

Modern slavery has been incorporated as a key consideration within our Sustainability and ESG principles, applicable to Seqwater's Capital Program and all projects exceeding \$50 million.

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. We communicate our modern slavery expectations of suppliers and provide the Queensland Supplier Code of Conduct on our [website](#). Additionally, our Procurement Management Policy was updated during the Reporting Period to include specific reference to our commitment to comply with the Modern Slavery Act and the Queensland Procurement Policy 2023. Our Procurement Management Policy is approved by the Board.

Seqwater is also in the process of further integrating and operationalising our commitments by embedding modern slavery considerations into our procurement procedures, including in our Procurement Framework and Procurement Procedure.

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 Modern Slavery Working Group within the Water Services Association of Australia (WSAA). In the previous reporting period, we participated in a WSAA-led Consortium of peers to trial the use of the 'Informed 365' platform as part of a collaborative sector response. The platform enables organisations to manage supplier modern slavery due diligence and risk activities. We continued to use Informed 365 as part of our risk assessment process in this reporting period.

Seqwater also meets quarterly with the Queensland Government Modern Slavery Community of Practice.

Seqwater has continued its engagement with Anti-Slavery Australia as a critical friend alliance. Anti-Slavery Australia (ASA) continues to provide specialist support and guidance for our modern slavery approach. During the Reporting Period, we worked with ASA to develop a training package (see Case Study, p 9) which will be rolled out to all employees in FY26 as part of their induction.

Seqwater understands the importance of knowledge sharing to uplift modern slavery due diligence approaches, and we will continue to leverage the broader WSAA community throughout FY26 (see Section 6 – Planned next steps).

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 Team. In addition, under our Modern Slavery Reporting and Response Protocol (see section 3.6 – Grievance mechanisms and remediation), Seqwater's Executive Leadership Team is responsible for oversight of any reports of suspected or actual incidents of modern slavery.



Engaging with our peers to support continuous improvement

Seqwater is a Member of the Modern Slavery Working Group within the WSAA. 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. The WSAA-led group encourages use of a third-party software solution platform, Informed 365, for supplier due diligence and modern slavery risk related activities. Informed 365 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.

During the Reporting Period, we increased our use of Informed 365 to request suppliers to complete the modern slavery questionnaire. More information on our Informed 365 use is detailed on Page 9.



Case Study: Enhancing our modern slavery training module with ASA

In FY25, Seqwater embarked on reforming its modern slavery training module to expand its scope and effectiveness. While the existing module is compliance-focused and aimed at the Procurement, Legal and Project teams, the new module aims to increase awareness to employees, with a particular focus on front-line workers.

By collaborating with Anti-Slavery Australia, who offers expertise in victim-centred strategies, we have developed an improved modern slavery awareness training module. This revamped module features case studies and practical examples to help employees identify instances of modern slavery and respond appropriately.

This awareness training is intended to be embedded into the induction process for all employees during FY2026, helping to achieve broader impact.

3.4 Risk assessment

During the Reporting Period, we progressed our assessment of residual modern slavery risks associated with suppliers identified as high inherent risk or above, using Informed 365 as follows:

- 15 new suppliers were identified as having an inherent risk of high or very high and requested to complete the supplier questionnaire through Informed 365.
- 515 suppliers in total have been identified as having an inherent risk of modern slavery, of which 510 have been engaged with through Informed 365 (90%).
- 211 suppliers have completed the Informed 365 supplier questionnaire (40%).
- All supplier questionnaire responses received indicated a modern slavery residual risk level of medium or lower.

Seqwater is continuing to formalise and embed modern slavery risk assessment within its standard procurement processes. We are currently developing a modern slavery risk management Work Instruction, which will provide our procurement team with a clear and consistent overarching process for identifying and responding to modern slavery risks from pre-qualification to contract management stages.

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.

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 organisation. We are currently in the process of developing general modern slavery training, which will be rolled out across the organisation. We also intend to update training for employees with modern slavery responsibilities, to provide detailed guidance on new procedures (including the Work Instruction mentioned in Section 3.4) for modern slavery risk assessments.

Seqwater has identified capability building as a key focus area for our ongoing modern slavery risk management approach (see Section 6 – Planned next steps) and we look forward to reporting on progress made.

3.6 Grievance mechanisms and remediation

Access to Seqwater's Whistleblower Hotline is available on Seqwater's dedicated [Modern Slavery](#) page. The Hotline provides an avenue for Seqwater employees and external stakeholders to securely and anonymously report suspected instances of modern slavery.

During the reporting period, Seqwater updated its internal Modern Slavery Reporting and Response Protocol, which outlines internal procedures and responsibilities for responding to modern slavery complaints. As noted in section 3.3, Seqwater's Executive Leadership Team has ultimate oversight of any reports of suspected or actual incidents of modern slavery.

Seqwater recognises that having accessible and effective grievance mechanisms and a remediation process is essential to encourage the reporting of modern slavery concerns. Seqwater is committed to continuing to review and update our existing grievance mechanisms to strengthen alignment with the *United Nations Guiding Principles (UNGPs)*.

4 Evaluating our effectiveness

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

Throughout the Reporting Period, we have made progress in two critical areas.

Supplier assessment

- ✓ All new Seqwater contracted suppliers have been assessed for inherent modern slavery risk.
- ✓ 211 suppliers were assessed for residual modern slavery risk.
- ✓ Of those suppliers assessed for residual modern slavery risk, no suppliers were assessed as high.

Stakeholder engagement

We remain an active member of the Water Services Association of Australia (WSAA) Consortium and continue to collaborate with Anti-Slavery Australia. Our ongoing partnerships have continued to uplift our ability to assess effectiveness, draw insights from industry peers, and contribute to a collective community effort whilst we mature our modern slavery risk management approach.

We are currently tracking the supplier assessment indicators set out above and will continue to report our progress against these indicators in future reporting cycles. As Seqwater continues to progress towards better practice, we aim to establish clear, measurable targets against which we can measure and evaluate the effectiveness of our modern slavery due diligence approach, ensuring ongoing improvement and accountability.



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 organisation more broadly.

In FY24, 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 organisation. We remain committed to the steps outlined in the roadmap and to a phased approach to maturing our efforts in this space.

We are committed to the following key actions for our next Reporting Period of financial year 1 July 2025 – 30 June 2026:



Enhancing modern slavery risk assessment by:

- increasing the number of suppliers referred to complete supplier questionnaires through Informed 365; and
- embedding modern slavery considerations within existing procurement frameworks and processes, including clear guidance on responding to suppliers assessed as high residual risk.



Designing and rolling out two levels of updated modern slavery training across Seqwater:

- (1) general training across the organisation for all employees upon Induction, including training on the Modern Slavery Reporting and Response Protocol; and
- (2) targeted modern slavery training for procurement and commercial teams with modern slavery responsibilities.



Continuing to leverage Informed 365 and engage with the broader WSAA community to share knowledge and uplift our modern slavery approaches.



Reviewing and improving Seqwater's modern slavery external [web page](#), with a focus on accessibility and clarity for external stakeholders.



Developing a framework for measuring effectiveness to ensure ongoing improvement and accountability.

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 27 November 2025.

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 27 November 2025.



Mr John McEvoy, FAICD
Seqwater Chairperson



