
Appendix K GRS Annual Reporting Template

Explanatory Note: This Annual Reporting Template can be used by covered entities to report against the NSW Anti-slavery Commissioner's *Guidance on Reasonable Steps*. For reporting on activities occurring up to 31 December 2023, it can be used as inspiration for entities' reporting.

For reporting from 1 January 2024, entities should report in two places:

1. By including relevant information in their entity's formal annual report.

The timing for this report is determined by other legislation or your entity's policies. This GRS Annual Reporting Template provides a template that you can use in preparing the modern slavery section of your annual report, or as a stand-alone report.

2. Using the online GRS Annual Reporting Form.

The GRS Annual Reporting Form is an online form on the OASC website which allows covered entities to share data directly with the Office of the Anti-slavery Commissioner. You should complete and submit this form upon publishing your Annual Report.

Information submitted may be published on the OASC website.

Report drafting instructions

Each entity should report the steps it has taken during the reporting period to identify and address modern slavery risks in its own operations and to ensure it did not procure goods or services made with modern slavery.

Each entity must report individually. Entities may however refer to steps undertaken jointly or incorporate a joint report by reference.

Report only those steps taken during the reporting period.

Report only those activities for which you are responsible. For example, endorsing agencies do not need to report on the activities of procuring entities that they endorse.

Part A. General information

Your report should include the following information:

A.1 Reporting Entity Details

Reporting entity details	
Reporting entity	Sydney Water Corporation (ABN 49 776 225 038)
Reporting period – start date	01-07-2023
Reporting period – end date	30-06-2024
Name of individual authorising this report	Dean Page
Position of individual authorising report	Executive General Manager Finance, Commercial and Digital
Contact details:	0439 783 911
<ul style="list-style-type: none"> Contact phone 	Procurement@sydneywater.com.au
<ul style="list-style-type: none"> Contact email 	Procurement@sydneywater.com.au
<ul style="list-style-type: none"> Confirm contact email 	Procurement@sydneywater.com.au
Organisational (shared) email	Procurement@sydneywater.com.au

A.2 Procurement Spend Details

A.2.1 What was your entity’s total procurement spend in this reporting period, to the best of your knowledge? \$3,047 million

A.2.2 Complete the following table with information for this reporting period:

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
Heightened	\$56 million	Building Repairs & Maintenance (Carpeting) Catering Cleaning & Hygiene Services Fleet Management Industrial cleaning supplies and services IT Hardware Systems IT Infrastructure Security Services Uniforms & PPE
Standard	\$1,112 million	Building modifications & fitouts Construction Services and Works Electrical Services Network Plumbing services Postage & Courier Services Recruitment Services – Temporary Labour

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		Roadworks
Light	\$1,879 million	Accounting & Auditing Services Actuators Aeration Devices Aircon Maintenance Asset valuation services Banking Fees Batteries & UPS Bearings & Mechanical Seals Bio-filters Biosolid Management Services Blasting & Corrosion Protection Services Blowers & Fans Boilers & Burners Building Repairs & Maintenance Centrifuge Chemical Dosing Facilities Chlor-alkali chemicals

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		Cogeneration Plants Compressors Concrete Concrete Cutting & Sawing Services Construction Project Management Conveyors Corporate Memberships/Subscriptions Council rates and charges Crane Hire Creative Agencies Customers Demolition and Remediation Desalinated Water Dewatering Services Diffusers Donations & Subscriptions Electrical & Electronic Supplies Electricity Engineering Services

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		<ul style="list-style-type: none"> Environmental Services Equipment Dry Hire Equipment Wet Hire Event Management & Venue Hire Fleet Management Freight & Transportation Fresh Water Gas Gas Monitors Gear Boxes Grinders & Mixers Grit & Screenings Ground Maintenance Services Hardware Consumables Health & Safety Insurance Services IT Processional Services Lease and Rental Legal advice and Service

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		Lifting Equipment Loan repayments and investments Lubrication and Bulk Fuel Management Consulting Services Mechanical Services Medical Metal Fabrication Services Meter Installation and Maintenance Services Meter Reading Services Meters supply Motors, VSD and Smart Starters Network Chemicals Network Inspection & Testing Services Office supplies, stationery and furniture Other Construction Products Other Industrial consumables Other Instrumentation and control equipment Other Mobile equipment Other Processing equipment

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		<ul style="list-style-type: none"> Other regulatory fees and government charges Outsourced treatment plants and networks Penalties and charges Pest Extermination Pipe Blockage Pipes and Fittings Polymers Postage and Courier Services Printing Services Property sales and purchase Public Relations Pumps Records Archive Recruitment Services – Permanent Labour Recruitment Services – Temporary Labour Revenue Collection Services Sand, soil and aggregates SCADA supplies and services Scaffolding hire

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		Scientific services Security services Sewer Repairs and maintenance Software licences and maintenance Supply of programmable logic controller Tanks Telecommunications supplies and services Tenancy management services Traffic management services Training and employee services Travel Treatment Chemicals Others UV Disinfection Equipment Valves and Accessories Ventshaft Materials Waste Processing Services Wastewater treatment Water filtration treatment services

GRS Due Diligence Level	Identified procurement spend <i>To complete this column, add up the total value of all procurements you are aware of at each GRS Due Diligence Level during the reporting period. Record the aggregate value at that GRS Due Diligence Level - do not break it down by product or service category procured.</i>	Categories procured <i>List the categories of good or service that you procured using each GRS Due Diligence Level during the reporting period. If applicable, use the relevant procurement category taxonomy in the IRIT (i.e. the procurement category taxonomy at Level 3).</i>
		Water monitoring/gauging services Water Testing
Minimal	NA as per GRS guidance	NA as per GRS guidance

Part B. Annual modern slavery reporting

B.1 Significant operational issues (section 31(1)(a) of the *Modern Slavery Act 2018 (NSW)*)

Identify any 'significant operational issue' that has been identified as such to your entity, during the reporting period, by the NSW Anti-slavery Commissioner, and explain the steps taken to address this issue.

None

B.2 Reasonable Steps

Describe the steps taken to ensure that goods and services procured by and for the entity during the reporting period were not the product of modern slavery.

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
<i>1 Commit</i>		
<i>1.1 Stakeholder Engagement</i>		
What steps did your entity take to engage with stakeholders during this reporting period in relation to modern slavery?	<ul style="list-style-type: none"> • Regular engagements with employees including development plans, Enterprise Agreement update, communications, encouragements and reminders to have continuous well-being discussions and activities • Ongoing assessment of potential modern slavery risks during supplier registration, sourcing and contract negotiation • Engaging actively with other water companies in Australia to share best practices, including learning from a modern slavery survivor and learning about new trends from Modern Slavery and Human Trafficking Branch Attorney-General's Department • Engaging with a 3rd party provider to implement a Modern Slavery risk assessment tool to be used across different water companies in Australia 	Mandatory
Did you engage with external stakeholders on modern slavery risks in this reporting period?	Yes/ No	Mandatory

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
<i>1.2 Identify salient risks at the organisational level</i>		
<p>What steps did your entity take to identify salient modern slavery risks at the organisational level (i.e. across all operational and procurement activities) during this reporting period?</p>	<ul style="list-style-type: none"> • Mapping our internal operations by looking at our internal employment and policies. We operate entirely in Australia with offices located around Greater Sydney. We have also internal policies to address the risks of modern slavery in our operations including Safety, Health and Wellbeing Policy, Wrongdoing Reporting Policy, Workplace Conduct Policy, etc. We feel that the potential risks of modern slavery in our operations are low. • Mapping of our procurement activities based on our spend categories to identify where the potential risks of modern slavery are including construction and works, information technology, uniforms and personal protective equipment, catering, event management and venue hire, recruitment services and cleaning and hygiene services. • We are also engaging with a 3rd party to implement a Modern Slavery risk assessment tool consistent with what other Australian water companies are implementing. It is our intention to start using the tool more extensively to conduct a more in-depth assessment of high risk areas and suppliers and to determine the best approach for remediation. 	Mandatory
<p>Did you conduct or update a Salient Modern Slavery Risk Assessment in this reporting period?</p>	<p>Yes / No</p>	<p>Mandatory Option to upload copy of risk assessment</p>
<i>1.3 Modern Slavery Policy</i>		
<p>What steps did your entity take to adopt a Modern Slavery Policy during this reporting period?</p>	<ul style="list-style-type: none"> • We have several internal policies to address the risks of modern slavery in our operations and we continuously review and update those policies. Our Workplace Conduct Policy, updated in the reporting period for example states incidents of discrimination, harassment, sexual harassment, bullying, victimisation or workplace violence are not 	Mandatory

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
	<p>tolerated and the safety and wellbeing of victim-survivors is prioritised. On the other hand our Wrongdoing Reporting Policy, also updated in the reporting period provides staff to raise concerns about suspected wrongdoing without fear of unfair treatment and this policy applies to full time, part time, temporary or casual, agency hire, suppliers, consultants, individual contractors and staff of contractors to Sydney Water providing contracted goods and services to Sydney Water. Additionally, we have also adopted Safety, Health and Wellbeing policy placing high importance on the safety, health and wellbeing of our people</p> <ul style="list-style-type: none"> • Our Procurement activities are governed by Procurement Framework which sets out the foundation, scope and structure of the procurement process at Sydney Water across the procurement lifecycle from planning, sourcing and purchasing to managing contracts and suppliers. In addition our Procurement policy gives principles and requirements for performing procurement activities, including supplier due diligence and risk assessment to be conducted prior to engagement in order to minimise the risk of unknowingly dealing with suppliers that are not in compliance with the Modern Slavery Act. 	
Do you have a modern slavery policy, approved by your senior governing body (e.g. Agency Head / Secretary), in place?	Yes / No	Mandatory Option to upload copy of policy
Does your modern slavery policy include high-level targets?	Yes / No	Optional
<i>1.4 Modern Slavery Risk Management Plan</i>		
What steps did your entity take to adopt a Modern Slavery Risk Management Plan during	<ul style="list-style-type: none"> • Sydney Water applies an assurance management process to review and manage modern slavery risks which is coordinated through the three lines of assurance: Management Control, Management Oversight and Independent Oversight. 	Mandatory

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
this reporting period?	<ul style="list-style-type: none"> We also monitor the modern slavery awareness training participation rate across the Procurement team, monitor suppliers' confirmation of their compliance with the modern slavery act prior to the onboarding confirmation, monitor the supplier pre-qualification approval rate, continually assess our engagement processes with suppliers, monitor a fit-for-purpose, centralised mailbox for anonymous reporting of modern slavery incidents and if Sydney Water is made aware of any supplier that may be subject to a modern-slavery risk or incident within their operations or supply chain, Sydney Water will contact the supplier for further information. Sydney Water will monitor the supplier's responsiveness, as well as their ability and willingness to work with us to validate and address the modern slavery risk or incident. 	
Do you have a modern slavery risk management plan, approved by your senior management, in place?	Yes / No	Mandatory Option to upload copy of plan
Does your plan assign accountability for performance against high-level targets to specific roles?	Yes / No	Optional
<i>2 Plan</i>		
<i>2.1 Identify and map your supply-chain risks for each procurement</i>		
What steps did your entity take to identify and map your modern slavery risks at the supply-chain level during this reporting period?	<ul style="list-style-type: none"> Mapping of our procurement activities based on our spend categories to identify where the potential risks of modern slavery are including construction and works, information technology, uniforms and personal protective equipment, catering, event management and venue hire, recruitment services and cleaning and hygiene services. 	Mandatory

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
<i>2.2 Develop a risk-reducing sourcing strategy</i>		
<p>What steps did your entity take to develop a modern slavery risk-reducing sourcing strategy during this reporting period?</p>	<ul style="list-style-type: none"> • Requiring suppliers to complete an online registration process where 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. • 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. • When a tender exercise is conducted, the tender document sets out the requirement for suppliers to supply information around modern slavery to Sydney Water which includes actions taken to assess and address modern slavery risks and willingness to work with Sydney Water to address the risks. • Sydney Water has 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. • 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, 	<p>Mandatory</p>

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
	requiring suppliers to put in place all necessary processes, procedures and compliance systems to ensure they comply with Modern Slavery laws.	
In what percentage of procurement processes was modern slavery factored into your entity's sourcing strategy or other procurement planning activities during this reporting period?	Percentage	Optional
<i>3 Source</i>		
<i>3.1 Select appropriate suppliers</i>		
What steps did your entity take to address modern slavery risks when selecting suppliers during this reporting period?	<ul style="list-style-type: none"> 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 has 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. When a tender exercise is conducted, the tender document sets out the requirement for suppliers to supply information around modern slavery to Sydney Water which includes actions taken to assess and address modern slavery risks and willingness to work with Sydney Water to address the risks. 	Mandatory
In what percentage of competitive procurement processes were the Model Tender Clauses used during this reporting period?	Percentage	Optional
<i>3.2 Adopt a shared responsibility approach to contracting</i>		

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
What steps did your entity take to adopt a shared responsibility approach to modern slavery risks, in contracting during this reporting period?	<ul style="list-style-type: none"> Sydney Water has 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. 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. 	Mandatory
In what percentage of competitive procurement processes were the Model Contract Clauses used during this reporting period?	Percentage	Optional
<i>4 Manage</i>		
<i>4.1 Monitor and evaluate supplier performance</i>		
What steps did your entity take to monitor and evaluate supplier performance relating to modern slavery, during this reporting period?	<p>As part of our supplier management process, we undertake the following processes:</p> <ul style="list-style-type: none"> 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. 	Mandatory

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
	<ul style="list-style-type: none"> • We monitor the modern slavery risks in our 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, conducting modern slavery risks assessments prior to the award of a contract • 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 are also engaging with a 3rd party to implement a Modern Slavery risk assessment tool consistent with what other Australian water companies are implementing. It is our intention to start using the tool more extensively to conduct a more in-depth assessment of high risk areas and suppliers. 	
Has your entity required any of your Tier 1 suppliers to undergo an audit addressing modern slavery risks in this reporting period?	Yes / No	Mandatory
What percentage of your Tier 1 suppliers underwent an audit addressing modern slavery in this reporting period?	Percentage	Optional
During the reporting period, what percentage of your Tier 1 suppliers' workforce were surveyed about their working conditions?	Percentage	Optional
What percentage of your Tier 1 suppliers' workforce are temporary migrant workers?	Percentage	Optional
What percentage of workers engaged by your Tier 1 suppliers in the last reporting period paid or incurred a fee to secure their engagement?	Percentage	Optional

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
<i>4.2 Develop supplier capabilities</i>		
What steps did your entity take to develop supplier capabilities relating to modern slavery risks during this reporting period?	We are engaging with a 3 rd party to implement a Modern Slavery risk assessment tool consistent with what other Australian water companies are implementing. It is our intention to start using the tool more extensively to conduct a more in-depth assessment of high risk areas and suppliers and to determine the best approach for remediation.	Mandatory
What percentage of your entity's Tier 1 suppliers reported that they had participated in modern slavery training during this reporting period?	Percentage	Optional
<i>5 Remedy</i>		
<i>5.1 Provide or enable access to effective grievance mechanisms</i>		
What steps did your entity take to provide or enable access to effective modern slavery grievance mechanisms during this reporting period?	<ul style="list-style-type: none"> • Including modern slavery as part of corruption hotline triage and reporting. The corruption hotline is publicly available on our website. • As part of our Wrongdoing Reporting policy, we are committed to: creating a culture where staff are comfortable and confident about reporting wrongdoing, encouraging staff to come forward if they are aware of or suspect wrongdoing, keeping the identity of the staff member disclosing wrongdoing confidential where this is possible, protecting staff from adverse action arising from making a report, keeping staff who make reports generally informed of progress and outcome, ensuring managers and supervisors at all levels understand the benefits of reporting wrongdoing and are familiar with this policy, taking appropriate action for all allegations of wrongdoing in our organisation 	Mandatory
How many complaints relating to modern slavery associated with your operations or the goods or services you procure were lodged during the reporting period, whether with your	None	Optional

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
organisation's grievance mechanism(s) or with others?		
<i>5.2 Take safe immediate steps to remedy harm</i>		
What steps did your entity take to safely and immediately remedy modern slavery harms to which you were connected during this reporting period?	<ul style="list-style-type: none"> • No modern slavery related complaints lodged during the reporting period • We monitor the modern slavery risks and 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 • 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 • 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. 	Mandatory
<i>5.3 Use leverage to remediate deficient practices</i>		
What steps did your entity take to use leverage to remediate deficient modern slavery risk management practices during this reporting period?	<ul style="list-style-type: none"> • No modern slavery related complaints lodged during the reporting period related to our operations and procurement activities 	Mandatory
In how many procurement contracts or	None	Optional

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
arrangements was a material breach related to modern slavery formally notified during this reporting period?		
<i>5.4 Withdraw responsibly</i>		
What steps did your entity take to withdraw responsibly during this reporting period, in connection to modern slavery risks?	No modern slavery related complaints lodged during the reporting period	Mandatory
How many procurement contracts or arrangements were terminated on modern slavery grounds during the reporting period?	None	Optional
<i>6 Report</i>		
<i>6.1 Establish a victim-centred reporting protocol</i>		
What steps did your entity take to establish a victim-centred modern slavery reporting protocol during this reporting period?	<ul style="list-style-type: none"> We have implemented modern slavery as part of corruption hotline triage and reporting while maintaining anonymity The corruption hotline is publicly available on our website. We have also implemented Wrongdoing Reporting Policy which applies to all Sydney Water staff, whether full time or part time, temporary or casual, agency hire, suppliers, consultants, individual contractors and staff of contractors to Sydney Water, who are providing contracted goods and services to Sydney Water. 	Mandatory
Do you have a modern slavery reporting protocol in place that prioritises the interests of the victim/survivor?	Yes / No	Mandatory
<i>6.2 Report on your modern slavery risk management efforts</i>		

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
What steps did your entity take to report on your modern slavery risk management efforts during this reporting period?	<ul style="list-style-type: none"> Submitting Sydney Water’s Modern Slavery Statement to the Department of Home Affairs to comply with the Modern Slavery Act 2018 (Cth). Submitting 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, pursuant to The Modern Slavery Act 2018 (NSW) (NSW MS Act) places the following further obligations on Sydney Water. 	Mandatory
Did your entity report on modern slavery in its prior Annual Report?	Yes / No	Mandatory
During the period, did your entity comply with its obligations to report heightened modern slavery due diligence procurements valued at \$150,000 (inc. GST) or more within 45 days?	<p>Yes / No</p> <p>[As confirmed by office of the NSW Anti-slavery commissioner, the reporting requirement has been postponed – email dated 13/06/2024]</p>	Mandatory
<i>7 Improve</i>		
<i>7.1 Learn lessons from your performance and others’</i>		
What steps did your entity take to learn lessons from your modern slavery performance and others’ during this reporting period?	<ul style="list-style-type: none"> Drawing lessons learned from our active discussion with other water companies in Australia, implementing Modern Slavery risk assessment tool to be used across different water companies in Australia Learning and understanding more of the new GRS issued by Office of the NSW Anti-slavery Commissioner early in 2024 by engaging with the Office – see 7.3 below 	Mandatory
Has your entity updated its modern slavery policies or procedures based on stakeholder feedback or lessons from a grievance mechanism	Yes / No	Mandatory

Reasonable Steps taken	Form of response for annual reporting	Response mandatory / optional for annual reporting
during this period?		
<i>7.2 Train your workforce</i>		
What steps did your entity take to train your workforce during this reporting period?	<ul style="list-style-type: none"> • Making it mandatory for those working in the Procurement area to take Modern Slavery Awareness online training, putting reminders of the training in various procurement newsletters and monitor the completion rate 	Mandatory
What percentage of your workforce received modern slavery training in the period?	<p>98%</p> <p>[The % reflects those completed the online training - see above, the mandatory training is applicable for those working in the procurement team]</p>	Mandatory
<i>7.3 Cooperate with the NSW Anti-slavery Commissioner</i>		
What steps did your entity take to cooperate with the Anti-slavery Commissioner during this reporting period?	<ul style="list-style-type: none"> • Attending OASC-SoC GRS Webinar chaired by Office of the NSW Anti-slavery Commissioner • Meeting with NSW Anti-slavery Commissioner and his team to discuss GRS IRIT tool • Completing Appendix K on GRS Annual Reporting • Various email correspondences to get clarification on the GRS 	Mandatory