

# SUEZ MODERN SLAVERY STATEMENT 2023



# ACKNOWLEDGEMENT OF COUNTRY

SUEZ acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of this place we now call Australia.

We recognise and respect their ongoing cultural and spiritual connection to the land and waters and their sustainable contribution to our natural capital's preservation.

**We pay respect to Elders past, present and future.**



# ABOUT THIS STATEMENT AND APPROVAL

This modern slavery statement (**Statement**) is made in compliance with the *Modern Slavery Act 2018 (Cth)* (**Act**) as a joint statement on behalf of all SUEZ Water's<sup>1</sup> subsidiaries and the following reporting entities:

1. **SUEZ ANZ HOLDINGS PTY LTD**  
ACN 653 823 726
2. **SUEZ WATER PTY LTD**  
33 051 950 068

This is SUEZ Water's second Statement, which has been prepared for the calendar year ended 31 December 2023.

The Board of SUEZ ANZ Holdings Pty Ltd and SUEZ Water Pty Ltd as the principal governing body, together with the Chief Executive Officer of SUEZ Water approved the Statement on 10 June 2024.



**Kevin Werksman**  
Chief Executive Officer  
29 June 2024

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<sup>1</sup> All references to SUEZ Water refer to SUEZ ANZ Holdings Pty Ltd (ACN 653 823 726) and its subsidiaries, unless otherwise stated.

# MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

At SUEZ Australia and New Zealand, our purpose is clear – **we connect to create a better future**. This purpose drives every facet of our work, from delivering essential services to communities, to ensuring ethical practices across our operations and supply chains.



**‘Our resolve to combat modern slavery is steadfast.’**

Kevin Werksman  
Chief Executive Officer, SUEZ Water

With a global footprint spanning 40 countries, the SUEZ Group provided drinking water to 57 million people worldwide in 2023. Locally, we are proud to keep 12 million people hydrated with the support of our 400-person-strong workforce across Australia and New Zealand. Our operations include eight water treatment plants, six water recycling plants, 30,000 smart meters installed, and 100,000 meters under contract.

**As custodians of our precious resources** – water, wastewater, waste, and energy – we are uniquely positioned to lead in the circular economy. Our responsibility extends beyond just managing these resources; it encompasses protecting and enhancing them for future generations. In this role, we reject all forms of modern slavery, including forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage, and deceptive recruiting practices. Our alignment with the United Nations Global Compact underscores our dedication to these principles on a global scale.

Our resolve to combat modern slavery is steadfast. We have robust systems in place to mitigate these risks, yet we continuously seek to enhance our approach, recognising the dynamic and evolving nature of these challenges. We firmly believe that people are our greatest asset. Their health, wellbeing, and dignity are paramount. This commitment extends beyond our immediate workforce to encompass everyone within our supply chain. We are acutely aware of our role in addressing modern slavery and are dedicated to fostering ethical business practices throughout our operations.

Our journey towards eradicating modern slavery is ongoing. We are committed to deepening our understanding of the risks and continuously improving our measures to mitigate them. As we move forward, we will remain vigilant and proactive, ensuring that our business not only thrives but also contributes positively to the global fight against modern slavery.

Together, we can and will create a future where every individual is free from exploitation, a future that is safe, ethical and just.

**We value corporate ethical business practices and recognise SUEZ Water has a role to play in eliminating modern slavery as part of a global problem.**

# ABOUT SUEZ WATER

## Our structure

The SUEZ Group is owned by a consortium of strong and reputable shareholders, determined to support an ambitious strategy to lead the Group to be a world-class, agile and innovative leader in environmental services.

SUEZ Water is an Australian subsidiary of the SUEZ Group, a global organisation headquartered in Paris, France with 40,000 employees in 40 countries.

The Group has been acting to deliver essential services for more than 160 years that protect and improve quality of life by enabling customers to provide access to water and waste service, with resilient and innovative solutions during a period of growing environmental challenges.

## SUEZ Water operations

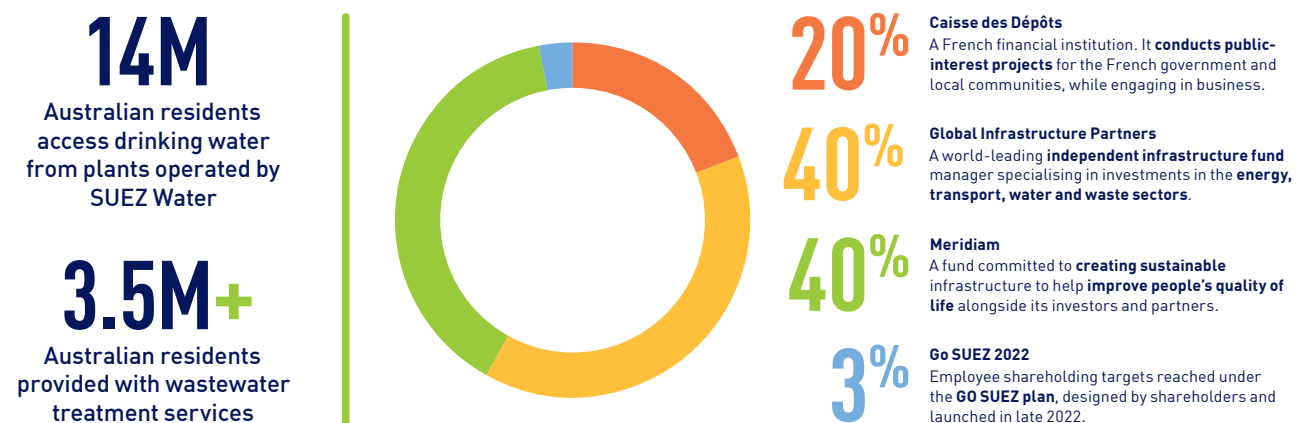
SUEZ Water's dedicated focus as a specialist water business with innovation expertise involves performing and delivering business activities across the entire water cycle value chain, with proven expertise in the engineering,

design and construction of water treatment facilities, drinking water distribution and sewerage services. Our focus on optimising the customer experience is a fundamental part of the SUEZ difference.

In Australia, we have 400 employees at 16 sites offering customer-focused and technologically advanced solutions to meet the water needs of millions of people. Our resource management solutions are at the leading edge in the provision of drinking water, desalination, wastewater treatment and re-use, biosolids management and smart water networks.

Our Water business is concerned with the treatment and reuse of water.

Our Technical Assistance Program offers local customers the opportunity to leverage the research and development programs at CIRSEE, our global R&D centre at the forefront of innovation in water and wastewater technologies. We deploy our experts across Australia and New Zealand on missions to help local utilities improve water quality, optimise process performance and deliver cost savings.



**14M**  
Australian residents access drinking water from plants operated by SUEZ Water

**3.5M+**  
Australian residents provided with wastewater treatment services

## SUEZ Water services

Ensuring that clean and safe drinking water makes it to households and businesses across Australia is no simple task. Our diverse technological expertise means we have the capacity to build and service high performance water treatment facilities.

Water is a reusable resource and we offer our clients proven solutions that enable wastewater to be treated and re-used. Through various 'sludge' treatment methods, SUEZ Water assists our customers in reducing, eliminating, or recycling biosolids.

SUEZ Water provides complete water network management services for water authorities and communities. Our investment in our smart network means we can not only provide remote water reading for our customers, but identify leaks across the network in real time.

SUEZ Water operates the Prospect Water Filtration Plant in Sydney's West that has been providing Australia's largest city with 85% of its drinking water for over two decades. With our partners, we operate two desalination plants in Australia delivering thousands of supplementary cubic metres of drinking water to residents per day.

# SUEZ WATER

## FACILITIES MAP



**H** Head Office

**01** Prospect Water Filtration Plant

**02** Victorian Desalination Project

**03** Boneo Water Recycling Plant

**04** Adelaide Service Delivery

**05** Perth Desalination Plant

**06** Noosa Wastewater Treatment Plant

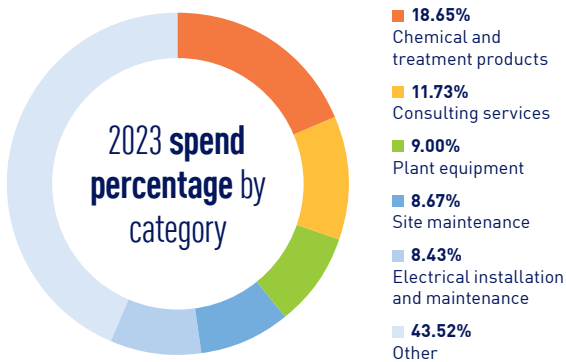
**07** Kooragang Industrial Water Scheme

**08** Gisborne Recycled Water Plant

**09** Goulburn Valley Water

# SUEZ WATER SUPPLY CHAIN

In 2023 SUEZ Water collaborated with over 600 suppliers, spending more than **AUD 150 million** from the period 1st January until 31st December 2023. The chart below illustrates the percentage of our top spend by category.



The remaining expenditure is primarily associated with outsourced mechanical work installations, sludge management, self-perform maintenance works, IT hardware and software, PPE and workwear, and cleaning services.

SUEZ remains steadfast in its commitment to ethical conduct and integrity in all business interactions, including those with suppliers and subcontractors. The company continues to enhance, implement, and enforce robust systems and controls to prevent modern slavery within its operations and supply chains.

Addressing modern slavery risk management with suppliers involves utilising various tools:

- Annual supplier assessments,
- Enhancing onboarding processes, and
- Engaging suppliers through questionnaire

In 2023, SUEZ updated its yearly supplier assessment protocol to further scrutinise potential risks among critical suppliers. Additionally, the onboarding process was revised to more effectively evaluate overseas suppliers and associated risks.

In 2023, SUEZ took action to address Modern Slavery risks within our network of subcontractors and suppliers. They were invited to participate in a Modern Slavery questionnaire, allowing SUEZ to gather insights into their strategies for managing this risk.

During the year, SUEZ distributed the 'Modern Slavery Questionnaire' (MSQ) to over 1400 suppliers in our database. Out of these, SUEZ actively engaged with 685 suppliers and received responses from 16% of them. The primary aim of the survey was to identify and address any potential risks in our supply chain.

Recognising the importance of robust supplier engagement, SUEZ is investigating possible software tools to be deployed in 2024 to enhance our ability to engage with suppliers and streamline the process of gathering essential information on modern slavery risks.

## SUEZ WATER MODERN SLAVERY RISKS

Our review of our supply chain identified the potential of the following modern slavery risks.



### PPE & WORKWEAR

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 overseas with risk of modern slavery.



### CLEANING SERVICES

Cleaning services is another risk of modern slavery 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.



### IT HARDWARE & SOFTWARE

Computers and other electronics pose risks of modern slavery for all businesses due to risks of conflict minerals and labour conditions including the risk of child labour in the production of critical components.

# SUEZ WATER RISK ASSESSMENT, MITIGATION AND REMEDIATION OF MODERN SLAVERY RISK

Our governance mechanisms inform our approach to risk assessment and mitigation of modern slavery risk.

## Our governance mechanisms that set the global standard in our governance framework

We use our Ethics Charter as the global standard that sets the minimum standard of behavior to ensure we work safely, behave ethically and abide by laws and regulations when performing our work and operating our business.

Our Ethics Charter helps grow and sustain our business to be a good corporate citizen. Our commitment is reaffirmed with the SUEZ Group being a member of the United Nations Global Compact.

The governance mechanisms in the SUEZ Group are used to implement and integrate our Ethics Charter as the global standard to support our governance framework for managing modern slavery risk which are set out on page 9.





**Objective**

**Group Vigilance Plan**

Takes a human rights risk-based approach with the Group Vigilance Plan (Plan) In 2023, SUEZ Group published its new vigilance plan covering the activities of all its subsidiaries.

The Plan helps identify and prevent the risks of negative impacts on people and the environment that would result from the activities of the SUEZ Group, its subcontractors and suppliers. It reports on a continuous improvement process within the SUEZ Group and with its partners by addressing the following:

- **Duty of Care** – Sets out the profile and organisation of SUEZ Group with regards to the exercise of its duty of care,
- **Risk Assessment and Mapping** – Approach to assess and map the risks of serious harm to human rights and fundamental freedoms, to health and safety and the environment,
- **Protective Measures** – Actions to mitigate and prevent risks, and
- **Review** – Monitoring and reporting results of the Plan.



**Source of Commitments**

The commitment to responsibilities set out in the Plan are based on the following reference frameworks:

- The Universal Declaration of Human Rights and additional pacts,
- The International Labour Organization (ILO) conventions,
- The Charter of Fundamental Rights of the European Union,
- The Organization for Economic Co-operation and Development,
- (OECD) Guidelines for Multinational companies,
- The United Nations Convention against Corruption,
- The French law on Duty of Vigilance and similar regulations in Britain and Australia (Modern Slavery Acts),
- The commitments voluntarily made by SUEZ within the framework of its Sustainable Development Roadmap, its adherence to the 10 principles of the United Nations Global Compact, or the Act4 Nature International initiative, and
- The Purpose of the SUEZ Group.

**United Nations Global Compact**

SUEZ Group has renewed its commitment and continues to be a member of United Nations Global Compact since 2008. Annual reporting on SUEZ Group’s Communication on Progress in:

- Upholding and implementing the 10 Principals of the UN Global Compact, and
- Integrating UN Sustainable Development Goals into its business.



The Ten Principles of the United Nations Global Compact are derived from:

- The Universal Declaration of Human Rights,
- The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work,
- The Rio Declaration on Environment and Development, and
- The United Nations Convention Against Corruption.

## Objective

### Corporate Social Responsibility

The ecological transition requires collective mobilization. It involves our teams, customers and partners, but also the beneficiaries of our facilities and host communities. Together, we will step up our actions to promote basic rights, not to mention the health and safety of the people at the heart of our value chain.

Their expertise is what drives our success. We will continue to work closely in communities, everywhere we operate, in an effort to reconcile human and economic development as well as increasing the positive impact of our businesses. Our progress is collective. Corporate Social Responsibility is our guiding principle. We are steadfastly committed to it.

Our social approach is based on 3 levers and 8 commitments:

Commitments	Indicators	Targets
01 Enforce basic rights among our value chain	# of basic rights infringements	0 from 2023
	# of corruption cases	
	% of FTEs <sup>(1)</sup> covered by a social dialogue mechanism	> 92 by 2027
	% of at-risk suppliers monitored	100 % by 2027
02 Make Health & Safety our top priority each and every day	Frequency rate	< 6,64 from 2023
	Severity rate	< 0,546 from 2023
03 Upskill our teams	% of people trained in the workforce per year	80 % from 2023
04 Promote equal opportunities	% of FTEs <sup>(1)</sup> in the workforce of people with disabilities [Global]	> 4 % by 2027
05 Eliminate the gender gap	% of women in management positions	> 40 % by 2027
	Global gender pay gap [Global]	> 85 by 2027
06 Foster collective engagement	% of Employees' shareholding	10 % by 2029 <sup>(2)</sup>
	# of hours of voluntary work from SUEZ employees with local associations/causes	Available in 2023
	Engagement rate (Pulse)	+10 vs benchmark from 2023
	Net promoter score	↑ from 2023
07 Support access to basic services in most critical situations	% of customers (water and sanitation services) covered by a solidarity mechanism	100% of new contracts covered <sup>(3)</sup> from 2023
	% of water distribution contracts 'profiled' towards water poverty (ie. mapping of areas at risk regarding availability, accessibility or affordability of services)	100 % by 2027
08 Contribute to local wealth and inclusion for all	% of FTEs <sup>(2)</sup> paid at a decent wage (after 2 years of operation, in countries where legal minimum is either too low or non-existent)	100 % by 2027
	% of local SMEs among suppliers	20% of spending allocated to local SMEs by 2027
	# of beneficiaries of SUEZ inclusive structures and job inclusion programs	5,000 persons per year by 2027
	€ spent with inclusive structures (ie. employing vulnerable people; work reintegration facilities [ESATs] in France)	Group trajectory to be defined by baseline from 2023

## Source of Commitments

Our commitments to Corporate Social Responsibility are aligned with the United Nations Sustainable Development Goals set out below:



<sup>(1)</sup> Full-time equivalent.

<sup>(2)</sup> 2027-2029 for internal communications purposes.

<sup>(3)</sup> If and when authorized by proposals.

Objective	Source of Commitments
<p><b>Ethics Charter</b></p> <p>Sets the minimum standard of behavior to ensure we work safely, behave ethically and abide by laws and regulations when performing our work and operating our business.</p>	<p>Laws and regulations in which SUEZ Group operates its business.</p>
<p><b>Practical Guide ‘Ethics in commercial relations’</b></p> <p>Provides guidance on how we approach certain commercial interactions and circumstances using the SUEZ Group’s ethical rules confirmed in the Ethics Charter.</p>	<p>Ethics Charter</p>
<p><b>Human Rights Policy</b></p> <p>SUEZ is vigilant in its respect for human rights, by and towards its employees and business partners. Beyond its due diligence efforts, SUEZ intends to promote equal opportunities and inclusion, and to play a leading role in the effective implementation of the right to water, on behalf of its customers. SUEZ Sustainable Development roadmap details our social and environmental commitments. Convinced that an ethical culture contributes to the long-term growth and sustainability of our company, we have set up a specific policy to share our commitments, reference texts and governance framework with all our stakeholders, so that everyone can play their part in protecting basic rights.</p>	<ul style="list-style-type: none"> <li>• The Universal Declaration of Human Rights and additional pacts,</li> <li>• The International Labour Organization (ILO) conventions,</li> <li>• The Charter of Fundamental Rights of the European Union,</li> <li>• The Organization for Economic Co-operation and Development,</li> <li>• The United Nations Guiding Principles on Business and Human Rights United Nations,</li> <li>• The United Nations Convention against Corruption,</li> <li>• The French law on the duty of vigilance and similar laws in the fight against modern slavery in the United Kingdom and Australia,</li> <li>• The Group’s purpose adopted in September 2022, and its Ethics Charter, updated in 2022: the commitments voluntarily made by SUEZ as part of its Ethics Charter, its Sustainable Development Roadmap, its adherence to the 10 principles of the United Nations Global Compact, and the OECD Principles on Water Governance, and</li> <li>• The International Finance Corporation’s sustainability standards, which apply directly to many SUEZ projects.</li> </ul>
<p><b>Leadership Model</b></p> <p>Provides the group with expected behaviours across our operations including accountability for ESG outcomes.</p>	<p>SUEZ Leadership Model</p>

SUEZ intends to promote equal opportunities and inclusion, and to play a leading role in the effective implementation of the right to water.



## Our governance mechanisms in SUEZ Water governance framework

The governance mechanisms in SUEZ Water are used to implement and integrate our Ethics Charter as the local standard for Australian market conditions and regulations, to support our governance framework with managing modern slavery risks which are set out below.

### Objective

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#### Equal Employment Opportunities, Discrimination, Harassment and Bullying Policy

Commitment to creating a working environment in which all employees are treated with dignity, courtesy and respect.

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#### Grievance Procedure

Gives all employees a clear process to address grievances.

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#### Inclusion Policy

Outlines our policy on inclusion and is linked to the SUEZ Group policy tagged 'Inclusion and Diversity'. This is purposely written this way to convey being inclusive to foster more diversity.

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#### Flexible Work Policy

Designed to attract and retain employees. Provides for flexibility to take advantage of all forms of diversity.

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#### Whistleblower Policy

Encourages and guides us to report in good faith any reportable conduct, including those related to human rights and modern slavery.

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#### Risk Management

Sets the expectations for directors, management and employee behaviours in managing risks, as well as providing a structured approach to risk management that incorporate SUEZ Group enterprise risk management.

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#### Enterprise Agreement

Sets our employment conditions and wages to ensure workers or employees are paid and subject to workplace conditions above the minimum standards of law.

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#### Procurement Framework

- Aims to ensure a consistent approach to procure all goods, materials, equipment, works and services using economic, qualitative and operational performance analysis of suppliers,
  - Supplier contracts set out standard requirements, including modern slavery and human rights, for all suppliers in our network,
  - Integrates due diligence in onboarding process and ensure compliance with Group Procurement policies and requirements,
  - Ongoing monitoring of suppliers using modern slavery questionnaire to ascertain modern slavery risk in supply chain, and
  - Ensure ongoing communication and exchange with the Procurement Team to enable deployment of the Group Purchasing policies and Group Purchasing strategies including commercial and regional constraints.
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#### Responsible Purchasing Policy as Part of the Procurement Framework

In a competitive market, finding competent companies and analyzing different solutions based on minimum requirements are key factors for remaining competitive. Our responsible purchasing policy promotes a responsible supply chain by qualifying suppliers according to legal and Corporate Social Responsibility (CSR) criteria. For a supplier to be selected, it must meet our ethical requirements, be able to fully comply with SUEZ Group's Ethics Charter, Health & Safety and CSR criteria and demonstrate its capacity to fulfil the specifications defined under a call for tender process.

**Objective**

**Supplier Qualification and Assessment as Part of the Procurement Framework**

As part of the onboarding of a new supplier, the Procurement Team, is responsible and accountable for ensuring that the supplier addresses the following minimum requirements:

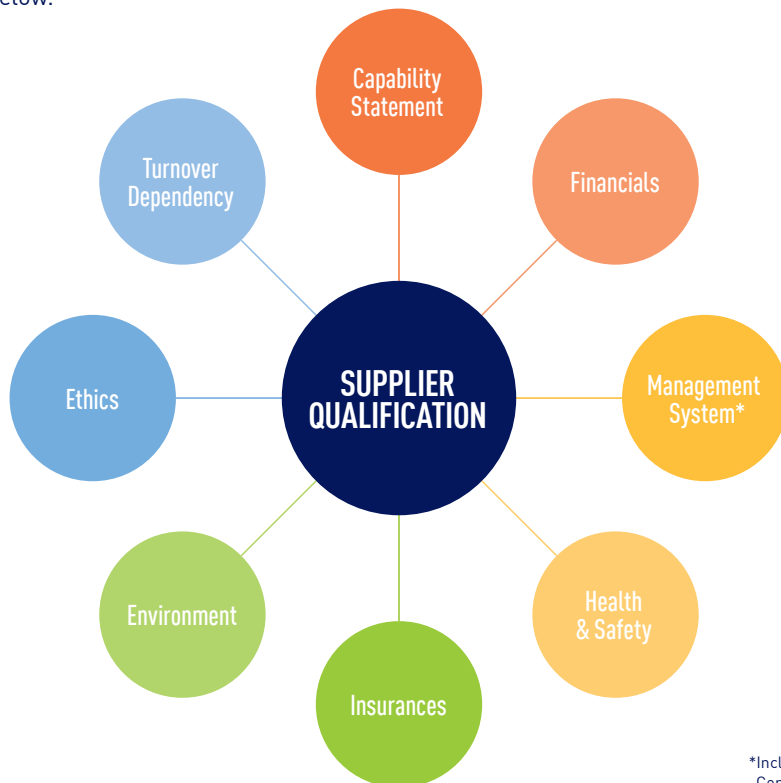
- Compliance with legal regulations,
- Adherence to Business Line quality, environmental, ethical, security and social standards,
- Adherence to Business Line technical standards,
- Ability to meet Business Line needs and capacity requirements, and
- Supplier pre-qualification as well as decisions regarding supplier selection and market price setting which must be documented.

The Procurement Team evaluates the supplier to ensure, and when necessary improve, the quality and competitiveness of the goods or services provided to meet the strategic and operational needs of the business including managing modern slavery risk.

SUEZ’s Supplier Qualification process involves evaluating four major risk factors, detailed in the table below. If the answer to any of the two questions is ‘Yes’, the supplier needs to be qualified.

Risk Factors	Key Questions
<b>Contract Value</b>	Is value of the order above \$50K?
<b>Criticality of the Goods/Services</b>	Will purchased goods/services put SUEZ at risk which will lead to contractual obligations not being met?
<b>Supplier Location</b>	Will the order be placed with an overseas supplier?
<b>Monopoly</b>	Are we impacted by supplier Monopoly situation?

To qualify a supplier, SUEZ’s Procurement Team requests that information is provided on the eight major aspects shown in the diagram below.



\*Includes Certified Company, Certifications, Quality Manager

## Our governance mechanisms for remediation in SUEZ Water governance framework

SUEZ Water will consider the impact on any person working for the company or on its behalf who believes they are a victim of slavery, human trafficking or forced labour. Furthermore, the company aims to support any such person, including assisting that person in reporting the concern to the appropriate authorities.

### Objective

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#### Whistleblower Policy

Sets out the process for employees and others to make confidential reports without fear of retaliation. Grievances reported under this policy are reviewed by SUEZ Water's ethics officer who, in appropriate cases, either conducts or commissions an investigation to understand the issue and ensure appropriate action is taken.

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#### Employee Assistance Program

The employee assistance program is also promoted as a support program for advice and assistance when needed. It provides an external and confidential support service by telephone through which advice and information are imparted to employees across a wide range of topics.



# SUEZ WATER

# ASSESSMENT OF EFFECTIVENESS

We recognise the value and importance of continual improvement and assessing the effectiveness of the actions taken to address modern slavery risks. We will reset key performance indicators (KPIs) to measure how effective we have been to ensure that modern slavery is not taking place in any part of our business or supply chains which will include:

## Operations KPIs

- Number of risk assessments conducted during the year and where appropriate, implementation of protective measures in response to risk assessment outcomes in response to potential modern slavery risks,
- Number of employees who have received training during the year, and
- Number of governance mechanisms reviewed for compatibility with human rights.

## Supply chain KPIs

- Number of self-assessment modern slavery questionnaires completed and returned by suppliers (Supplier Questionnaire).
- Implementation of protective measures in response to outcomes from the Supplier Questionnaire.
- Number of suppliers identified in hotspot categories and subsequent interviews,
- Number of modern slavery incidents identified in our supply chain, and
- Percentage of new starters who have completed awareness training.

## Opportunities for improvement in 2024

SUEZ Water look forward to further embedding protective measures to uphold and respect human rights in the course of operating its business that manage risks of modern slavery, which are summarised below:

- Refresh Procurement Framework including onboarding of suppliers process (including due diligence supported by training), refresh of procurement precedents and distribute modern slavery questionnaire to help inform protective measures,
- Refresh Risk Management Framework including conducting risk workshops and risk mapping of our supply chain,
- As part of the SUEZ Group global standard implementation of the Group Vigilance Plan 2023 (refer to page 9) and Human Rights Policy and Action Plan (refer to page 11), and
- Reset Key Performance Indicators to align with the governance mechanisms in SUEZ Group and SUEZ Water's governance framework.

## Consultation across SUEZ

Consultation across SUEZ has involved consultation with SUEZ Group (managers and subject matter experts) and SUEZ Water which comprises Senior Executive Management and the Interim Chief Executive Officer and Chief Financial Officer.

SUEZ Water look forward to further embedding protective measures to uphold and respect human rights in the course of operating its business.



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