

# MODERN SLAVERY RESPONSE PROTOCOL

## PURPOSE OF PROTOCOL

This protocol describes the steps to report suspected instances of modern slavery exploitation (i.e. forced and bonded labour and human trafficking) at a local or international level.

## RESPONSIBILITY

The Head of Procurement and Supply is responsible for reviewing and overseeing this protocol.

## REPORTING SUSPICION OF, OR ACTUAL, MODERN SLAVERY

### Local findings – reporting modern slavery in Queensland/Australia

Local findings or allegations occur when Urban Utilities becomes informed of, or identifies allegations that, a supplier is engaging in modern slavery in Queensland or Australia. Identification can occur directly through procurement due diligence processes, by an employee of Urban Utilities, informed by a member of the public or a supplier, or via media monitoring reports.

### Step 1 – Record and refer

- Report the allegation via Urban Utilities **Disclosure Program**, an independent and confidential service for employees, suppliers, or anyone in the community to make a disclosure.
- Importantly,
  - If someone is in immediate danger, or a child is concerned, dial 000.
  - Do not engage further with the supplier on the allegation.
  - Do not attempt to further investigate or verify the allegation.
  - Maintain privacy and confidentiality of complainants where necessary.

### Step 2 –Investigations/Action

- Allegations reported via the Disclosure Program will be investigated and appropriate action will be taken, including escalating to law enforcement authorities if required.
- Where appropriate, the Executive Leadership Team to be briefed on the reported allegation and actions being taken.

### Step 3 – Plan a remedy

- If the allegation is determined to be credible, Urban Utilities Legal representatives will work with the Australian Federal Police, and other Australian Government authorities and relevant stakeholders to develop and implement a plan to action contractual remedies to reduce harm caused and how future such instances can be prevented.

## INTERNATIONAL FINDINGS – REPORTING MODERN SLAVERY IN OVERSEAS SUPPLY CHAINS

International finding or allegations occur when Urban Utilities becomes aware of, or identifies allegations that, a supplier is engaging in modern slavery in its overseas supply chains. Identification can occur directly through supply chain management and due diligence processes, informed by an employee of Urban Utilities or a member of the public or a supplier, or media monitoring reports.

### Step 1 – Record and refer

- Report the allegation via Urban Utilities **Disclosures Program**, an independent and confidential service for employees, suppliers, or anyone in the community to make a disclosure.
- Importantly:
  - Do not engage further with the supplier on the allegation.
  - Do not attempt to further investigate or verify the allegation.
  - Maintain privacy and confidentiality of complainants where necessary.

### Step 2 –Investigations/Action

- Allegations reported via the Disclosure Program will be investigated and appropriate action will be taken, including escalating to law enforcement authorities if required.
- Where appropriate, the Executive Leadership Team to be briefed on the reported allegation and actions being taken.

### Step 3 – Plan a remedy

- If the allegation is determined to be credible, Urban Utilities Legal representatives will work with the Australian Border Force to develop and implement a plan to action contractual remedies if applicable or other reasonable action to reduce harm caused and how future such instances can be prevented.

For more information visit [urbanutilities.com.au](https://urbanutilities.com.au) or call **13 26 57**

**Urban Utilities**  
PO Box 2765 Brisbane QLD 4001

ABN 86 673 835 011