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Modern Slavery Statement 2021



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A MESSAGE FROM OUR CEO

In Australia and New Zealand, Veolia employs in 2021 more than 4,600 employees across more than 190 locations. People are at the core of what we do as a global champion of Ecological Transformation.

We are committed to ensuring our impact on our community through employment, supply chain and our operations is ethical, fair and in the best interests of people and our environment.

Our Modern Slavery Statement declares our commitment to identify, manage and mitigate the risks of modern slavery.

Veolia will strive for continual improvement across our organisation in Australia, New Zealand and across our global footprint.

Richard Kirkman
CEO and Managing Director
Veolia Australia and New Zealand



This statement has been published in accordance with the Modern Slavery Act 2018.

During the financial year ended 31 December 2021 (“FY21”), the reporting entity (“Veolia”), as detailed in the “Reporting Entity” section of this statement, reported an annual consolidated revenue in excess of \$100m. This statement constitutes Veolia’s Modern Slavery Statement for the financial year ended 31 December 2021.

This second modern slavery statement outlines the steps we have taken to identify, manage and mitigate the risks of modern slavery in our operations and supply chain, aiming at achieving a ‘Modern Slavery Free’ environment.

This statement was approved by Veolia’s Executive Committee in its capacity as principal governing body of Veolia in Australia and New Zealand on 29 June 2022. It is signed by the CEO and Managing Director of Veolia in Australia and New Zealand.



Modern slavery is an umbrella term used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is defined by eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and, the worst forms of child labour, where children are subjected to slavery or similar practices. It does not include practices like substandard working conditions or underpayment of workers, however, tolerance of less severe abuses can create the conditions that allow modern slavery to occur.



Acknowledgement of Country

At Veolia, we respect and connect to Country and our community. We endeavour to be a positive contributor to society, behaving ethically and with respect for all people, welcoming diversity of thought, background and experience.

In Australia, we acknowledge the Aboriginal and Torres Strait Islander people as the original custodians of our land, and are committed to walking alongside them to connect, learn, and create sustainable opportunities in the communities in which we live and operate.

In New Zealand, we recognise the Maori people as the Tangata Whenua Aotearoa (people of the land NZ), and the Tiriti o Waitangi (Treaty of Waitangi) which is committed to the inclusion of all people.

ABOUT VEOLIA AUSTRALIA AND NEW ZEALAND

Veolia is here to ensure that humans can continue to thrive.

We are here to clear up, to clean, to recover, to recycle; and to provide renewable energy and sanitised water.

That is our Purpose.

Veolia sets itself the task of “Resourcing the World” by protecting, preserving and providing access to vital resources.

Veolia is an ethical organisation where the values it proclaims contribute to establishing its legitimacy as a company.

Veolia contributes to environmental conservation and economic development and strives for continuous progress in the careful management of natural resources, the fight against climate change, pollution reduction, the preservation and development of biodiversity and the improvement of the health and well-being of the populations.

This includes taking a proactive stance against modern slavery and the conditions that enable it.

Veolia is committed to applying and ensuring compliance with its Modern Slavery policy among its employees, as well as promoting that policy among its other stakeholders, customers, subcontractors and suppliers. Veolia expects all stakeholders to conduct their activities with respect for human rights, in accordance with the Modern Slavery Act 2018.

At Veolia, we are convinced that continuing human development is only possible if economic, social and environmental issues are addressed as an indivisible whole. This belief is embedded in the history of the company, which as soon as it was created in 1853, showed the way by making access to drinking water an essential element of public health and quality of life.

We celebrate our past, with a focus on our future. With more than 160 years of global experience, and a local genesis over 50 years ago, we have a solid foundation of expertise. We draw on this experience to create the water, waste, energy and industrial solutions that mitigate climate change, create liveable and resilient cities and foster harmonious communities.



Reporting Entity

This Statement applies to Comgen Australia Pty Ltd (ABN 17 050 242 441), Veolia Water Australia Pty Ltd (ABN 99 061 161 279) and Veolia Energy Services Australia Pty Ltd (ABN 36 122 191 208) as well as to:

- ◀ Their respective wholly owned entity; and
- ◀ The entities over which these have control.

These include in particular:

Veolia Environmental Services (Australia) Pty Ltd ABN: 20 051 316 584	Western Resource Recovery Pty Ltd ABN: 91 099 144 180
Veolia Water Utilities (Aust) Pty Ltd ABN: 71 072 158 108	Veolia Energy Technical Services Pty Ltd ABN: 46 064 584 587
Veolia Water Operations Pty Ltd ABN: 14 061 161 297	Veolia Energy Solutions Pty Ltd ABN: 30 129 471 558
Veolia Water Services (ANZ) Pty Ltd ABN: 64 069 471 334	North West Alliance Pty Ltd ABN: 25 164 277 614
Veolia Water Services ANZ Pty Limited NZBN: 942 903 813 4586	Bendigo Water Services Pty Ltd ABN: 68 087 333 088
Total Waste Management Pty Ltd ABN: 51 077 898 607	Ti Tree Bioenergy ABN: 67 450 387 919

“Veolia” refers to the Group of entities listed above. This joint modern slavery statement covers all entities included in Veolia. All entities, defined above as Veolia, work closely together and share policies and processes.

All entities referred to as Veolia are centrally managed from Veolia’s corporate head office located Level 4, 65 Pirrama Road, Pyrmont, 2009, NSW. These also share the same Executive Committee acting as principal governing body of Veolia in Australia and New Zealand. The CEO and Managing Director of Veolia, chairs the Veolia Executive Committee and is a member of the Board of Directors for each entity.

This statement was approved by Veolia’s Executive Committee in its capacity as principal governing body of Veolia in Australia and New Zealand on 29 June 2022. It is signed by the CEO and Managing Director of Veolia in Australia and New Zealand.

Veolia, as described above, is part of the Veolia Environnement SA group of companies, headquartered in France. Veolia Environnement SA is a corporation listed on the Euronext Paris (VIE:PA). Veolia Environnement SA, as a Group, also complies with the French “Duty of Care” Law. As such, Veolia Environnement SA publishes annually a **Vigilance Plan** that sets out how the Group meets the requirements of this legislation on human rights and fundamental freedoms, health and safety, serious environmental damage, and suppliers and subcontractors.

OUR CAPABILITIES

WATER AND WASTEWATER TREATMENT

We work with local authorities, industrial and commercial clients to design, build, operate and maintain their water plants and networks. Our experience is coupled with the latest technological solutions for process water, ultrapure water, water and wastewater treatment, recycling and reclamation, and network solutions. We also offer service-based consulting to help clients manage their capital investment and optimise the management of their plants and networks.

Our water capabilities include:

- ✓ Water and wastewater treatment
- ✓ Operation and maintenance
- ✓ Recycled water for reuse
- ✓ Water for industry
- ✓ Digital monitoring and integrated smart-solutions
- ✓ Network maintenance and rehabilitation

INDUSTRIAL SERVICES

Serving clients within heavy industries such as mining, oil and gas, and manufacturing;

Veolia can provide complete facilities management that is inclusive of:

- ✓ Waste assessments and reporting
- ✓ Chemical clean up
- ✓ Remediation services
- ✓ Shutdowns

Through a multi-technical solution, Veolia can also devise a suitable water and energy management plan that includes the operations and maintenance of on-site assets.

WASTE MANAGEMENT AND RESOURCE RECOVERY

Providing environmental solutions for the collection and recovery of commercial and municipal waste, we work with clients to devise a custom waste treatment and recovery plan for their specific waste streams. Our focus is to realise opportunities to turn waste into a secondary resource; thereby, reducing waste-related environmental impacts.

This is achieved by providing customers with:

- ✓ Waste assessments and reporting
- ✓ Solid waste collection
- ✓ Medical waste collection and treatment
- ✓ Liquid and hazardous waste collection and treatment
- ✓ Resource recovery and recycling
- ✓ Educational material
- ✓ Energy from waste

ENERGY SOLUTIONS

Delivering end-to-end solutions for energy supply and use, we are able to holistically manage energy performance contracts, district energy networks and industrial utilities.

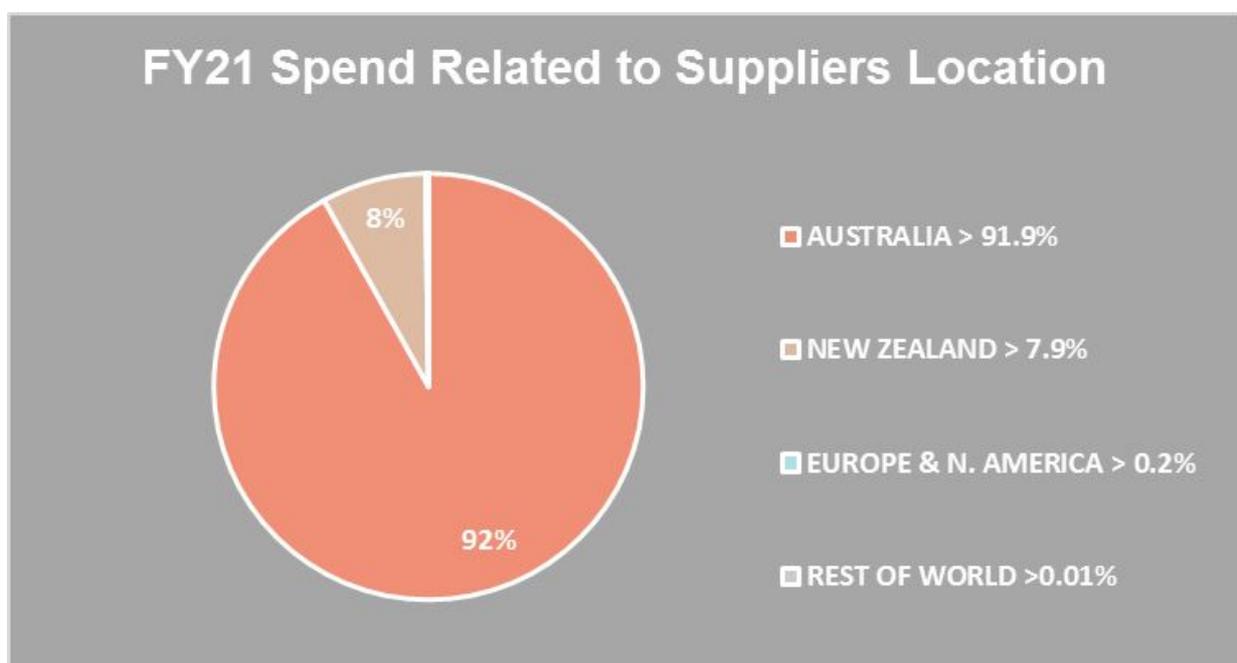
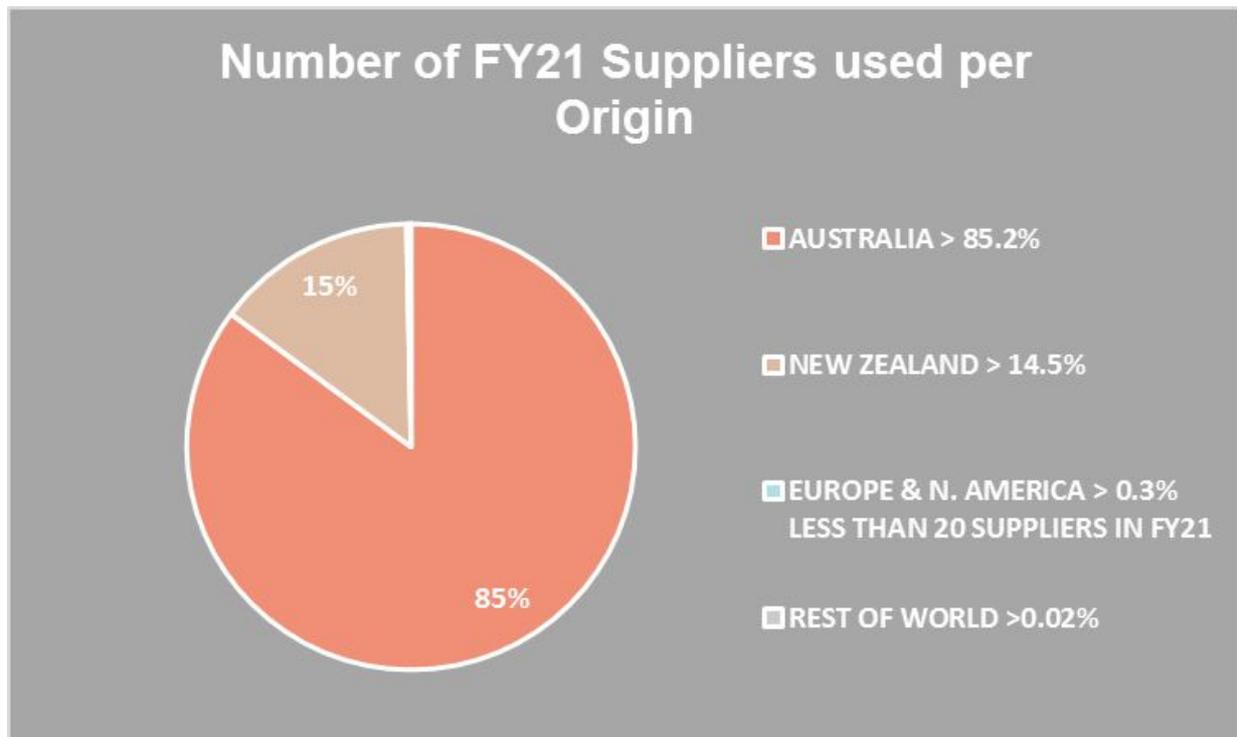
Veolia can deliver sustainable energy management solutions through:

- ✓ Energy performance contracts
- ✓ Facilities management
- ✓ Building management systems
- ✓ Power generation
- ✓ District energy
- ✓ Carbon neutral and green energy solutions

OUR SUPPLY CHAIN

In FY21, Veolia worked with more than **5,500 direct suppliers**.

With the size of our operations, our supply chain is relatively complex. While we largely use suppliers based where we operate, we are supplied by all types of economic actors: from local businesses through to global companies.



The below table presents a summary of Veolia's spend categories as well as the typical products / services for each of the categories.

Category		Typical products / services in the Category
Industrial, Technical & Service Subcontracting (42% of FY21 spend)		<ul style="list-style-type: none"> ◀ Waste and Treatment Subcontracting ◀ New Works and Maintenance ◀ Mobile Equipment Subcontracting ◀ Subcontracting and Facility Management
General Purchasing (15% of FY21 spend)		<ul style="list-style-type: none"> ◀ Human Resources Services & Contingent Labour ◀ Professional Travel ◀ Health Safety Products Equipment (including PPE and Workwear) ◀ Office Supplies ◀ Regulatory and Non Regulatory Inspections
Operating Supplies, Material & Equipment (15% of FY21 spend)		<ul style="list-style-type: none"> ◀ Automatic Systems, Electrical Equipment and Electronic Components ◀ Building Materials ◀ Transmission, Valves and Small Mechanical Components ◀ Worksite Equipment
Energy, Chemicals, Materials & Products (8% of FY21 spend)		<ul style="list-style-type: none"> ◀ Energy Fuel and Combustibles ◀ Organic and Mineral Chemicals ◀ Recyclable Product
Mobile Equipment & Motorised Equipment		<ul style="list-style-type: none"> ◀ Mobile Equipment Fleet ◀ Removable Mobile Device Pre-Collection Equipment
Intellectual Services		<ul style="list-style-type: none"> ◀ Management, Strategy and Technical Consulting ◀ Marketing and Communication ◀ Insurance
IT & Telecommunications		<ul style="list-style-type: none"> ◀ IT Equipment ◀ Software applications ◀ Telecommunications
Real Estate		<ul style="list-style-type: none"> ◀ Real estate rental
Taxes, Usage Fees, and Royalties		<ul style="list-style-type: none"> ◀ Customs duties ◀ Infrastructure usage fees ◀ Professional taxes ◀ Waste-related taxes

RISK ASSESSMENT

Veolia Environnement SA's risk mapping is based on its own methodology developed by the Group's Risk Management Department. The risk analysis methodology includes a combination of exogenous and endogenous factors to define the overall risk mapping. Based on the internal risk assessment, mitigation action plans are developed and prioritised by geographies. Implementation of action plans is monitored closely.

The main risk mapping methods used are:

- ◀ Working groups participated in by functional departments;
- ◀ Questionnaires to encourage feedback to nurture analysis and reflections during the risk assessment; and
- ◀ Discussions between the head office and operations to ensure consistency and feed the sorted results of the mapping process.

In Australia, Veolia uses the Veolia Environnement SA's risk assessment to further detail the local risks based on the exposure to certain countries, the industry we are operating in and a number of other key risk factors.

In 2021, in order to update the risk profile relating to Modern Slavery, Veolia:

- ◀ Surveyed a panel of exposed employees;
- ◀ Risk mapped high spend suppliers;
- ◀ Partnered with UN Global Compact.

Identified Modern Slavery Risks

This risk mapping highlighted that Veolia's Modern Slavery main risk exposures lie with:

- ◀ Our Supply Chain generally, and more specifically with our industrial clothing provider, Temporary Labour and Agency Workers as well as some of our external subcontractors;
- ◀ Our direct use of Labour.

However, 99.7% of our active suppliers operate from Australia or New Zealand and these suppliers represented 99.8% of our FY21 spend.

RISK MITIGATION & REMEDIATION

Global Approach

Globally, Veolia Environnement SA is committed to supporting and advocating for human rights. Veolia Environnement SA, headquartered in Paris (France) is subject to the French Duty of Care Law.

This commitment is demonstrated in Veolia Environnement SA's **9 Sustainable Development Commitments** as well as in our fundamental values and principles as set forth in our [Ethics Guide](#). Such values include solidarity, respect, innovation, customer focus and responsibility.

The Sustainable Development Commitments guide our relations with internal and external stakeholders. Veolia Environnement SA is committed to respecting employees' human rights but also those of the individuals and communities where Veolia operates.

Veolia Environnement SA has been a member of the United Nations Global Compact since 2003. This membership commits the Group, globally, to promoting 10 fundamental principles of human rights, labour rights, and protection of the environment. Since 2014, Veolia Environnement SA has had its place at the "advanced" level of the United Nations Global Compact differentiation program which uses 21 specific criteria to set the highest standard of voluntary performance reporting on responsible development.

To clearly identify our contribution to the Sustainable Development Goals ("SDGs"), Veolia is a major player in sustainable cities (SDG 11) through its management of essential services like water, sanitation (SDG 6), energy (SDG 7) and waste (SDG 11). And with its growth activities, Veolia encourages innovative industrial production methods (SDG 9) and more responsible consumption through the circular economy (SDG 12).

Our capacity for innovation (SDG 9) and our relations with them (SDG 17) were identified as key to helping to achieve the SDG, particularly in terms of combating climate change (SDG 13).

Veolia Environnement SA globally implemented a Human Rights framework, applied across the Group, as well as in Australia and New Zealand. This framework defines in particular:

- ◀ A governance and steering device
- ◀ A Human Rights Policy
- ◀ An Annual Risk Analysis
- ◀ Performance Assessment tools
- ◀ Dialogue with local and international stakeholders
- ◀ Transparency of non-confidential data and actions

Local Approach

Veolia, globally and in Australia & New Zealand, has a zero tolerance approach to modern slavery and the conditions that enable it. To combat modern slavery, Veolia has developed a multi-year **anti-slavery strategy** which supports our commitment. Our approach to modern slavery is centred around four pillars underpinned by continuous improvement.

- ◀ **Internal Awareness:** Embed modern slavery awareness and due diligence within business as usual activities and employees' knowledge;
- ◀ **Supply chain awareness and due diligence:** Increase supply chain vigilance;
- ◀ **Victim Support:** Ensure a victim centred approach with an established support mechanism; and
- ◀ **Collaboration:** Improve engagement with stakeholders and build partnerships with peak bodies, NGOs and industry.

This approach enables Veolia a clear yet flexible approach to tackle modern slavery issues with specific actions underpinned by a robust reporting and governance framework.

Modern Slavery Governance

A robust governance process is established to ensure the anti-slavery strategy is executed with clear measurable objectives and that progress is monitored on a regular basis. The following groups and committees are established to deliver the objectives.

CEO & Veolia Executive Committee

The CEO and the Veolia Executive Committee have overall accountability for ensuring the anti-slavery strategy is appropriately executed.

Safety, Ethics & Compliance Steering Committee

The Safety, Ethics & Compliance Steering Committee provides guidance and decisions as required. It is sponsored by two members of the Veolia Executive Committee and reports directly to the Veolia Executive Committee. It also endorses the anti-slavery strategy.

Modern Slavery Working Group

The interdisciplinary Modern Slavery Working Group is responsible for:

- ◀ Assessing the modern slavery risks within Veolia's operations and supply chains;
- ◀ Developing the anti-slavery strategy;
- ◀ Delivering the anti-slavery strategy, particularly through the implementation of actions aiming at mitigating identified risks; and
- ◀ Remediating any Modern Slavery instances identified.

The interdisciplinary Modern Slavery Working Group's core members are senior members from the following teams: **Ethics, Compliance, Risks, Sustainability, Legal, Procurement and Human Resources**. The Modern Slavery Working Group meets on a monthly basis and as required. In 2021, a network of Modern Slavery Champions has also been implemented in order to complement the current organisation.

KEY SPECIFIC RISK MITIGATIONS IN PLACE IN 2021

Specific Risk Mitigations (based on specific Risks identified in the risk mapping)

Industrial Clothing

Veolia continues to ensure that only preferred supplier arrangements are in place for the provision of Industrial Clothing. Preferred suppliers require strong ethical and social procurement practices and the application of a structured approach to managing potential modern slavery risks. Portions of Veolia's Industrial Clothing range is manufactured off shore in accordance with the supplier's strict corporate governance guidelines. Veolia continues to ensure that audits are completed periodically and include the assessment of Modern Slavery risks.

Other minor Industrial Clothing suppliers currently account for less than 10% of Veolia's spend with an intention to further reduce Veolia's exposure to these suppliers.



Labour Hire

Veolia continues to mitigate potential modern slavery risks in our labour hire supply chain through a preferred panel of labour suppliers selected to manage contingent labour needs in line with Veolia's Corporate and Social Responsibility requirements. This panel arrangement was implemented in 2018 and consists of selected suppliers with a commitment to endorse, monitor and manage the intent and purpose of the Modern Slavery Act 2018. Veolia continually works with these suppliers to further refine and develop commitments to identifying and rectifying any indications of modern slavery in our supply chain.

Direct Use of Labour

Veolia employs 4,600+ individuals on direct contracts of employment. Veolia is fully compliant with the legislative requirements of the Fair Work Act 2009 and the Fair Work Regulations 2009. Wages are paid electronically directly to the employee's bank account. In Australia for example, in line with Department of Home Affairs guidance, Veolia will not employ anyone without the correct proof of Right to Work.

Veolia works in partnership with 7 trade unions to ensure agreed and reasonable pay for its staff.

Veolia is also strongly committed to:

- ◀ **Eliminate discrimination.** Employee diversity is an asset which allows the company to innovate and perform better. Veolia strives to be a socially responsible employer, everywhere it operates, to guarantee the respect of every individual, while encouraging a greater diversity of profiles and developing inclusion within teams;
- ◀ **Guarantee equal opportunities,** recognising the talents of every individual and avoiding all discrimination on the grounds of origin, gender, disability, age, etc; through fair and non-discriminatory Human Resources processes ensuring the development of diversity and gender equality;
- ◀ **Guarantee the development of social dialog and freedom of expression of employees;**
- ◀ **Guarantee the right to work in a healthy safe environment.**

These commitments, along with the mechanisms and processes in place to achieve these, are developed in detail in Veolia's policy framework.

Veolia's Whistleblowing Policy ensures that it covers, among other elements, any unlawful activity relating to modern slavery.



GENERAL RISK MITIGATIONS ALIGNED TO OUR ANTI-SLAVERY STRATEGY

Internal Awareness: Embed modern slavery awareness and due diligence within business as usual activities and employees' knowledge

Why?	How?
<p>Modern Slavery involves the abuse and coercion of vulnerable people. It is essential that businesses in line with the UN Guiding Principles of Business, Human Rights and UN Sustainable Development Goal 8.7 foster an environment that recognises that it is everyone's business to foster an environment that tackles modern slavery and supports victims and those at risk.</p>	<ol style="list-style-type: none"> 1. Developed a third party compliance due diligence Procedure (including modern slavery). 2. Communicated broadly on the Veolia Modern Slavery Framework and Modern Slavery Statement 3. Rolled out a "Spot the Signs" Communication Campaign 4. Refreshed Veolia Modern Slavery Intranet page 5. Reviewed existing information, policies, and procedures to assess risk and developed new policies, procedures and plans as required 6. Promoted Veolia whistleblowing program to all employees 7. Trained members of the supply chain function 8. Trained 2380+ employees on Modern Slavery 9. Trained 610+ managers on Modern Slavery response 10. Developed a Modern Slavery Champion Network 11. Complied with applicable laws for our direct use of labour

Supply Chain awareness and due diligence: Increase supply chain vigilance

Why?	How?
<p>Under the Guiding Principles on Business and Human Rights, Veolia has a responsibility to respect human rights which includes taking actions to prevent, mitigate and where appropriate to remediate modern slavery through working with suppliers and reviewing our own operations.</p>	<ol style="list-style-type: none"> 12. Mapped key parts of operations and Tier 1 supply chain 13. Risk mapped high spend suppliers 14. Surveyed a panel of exposed employees to update the Modern Slavery risk profile 15. Developed purchasing guidelines for buyers for all categories where there is a local or global supply arrangement in place 16. Set objective criteria for selecting our suppliers and service providers ensuring adherence to ethical and sustainable development rules adopted by Veolia globally 17. Loaded Modern Slavery Clause on Veolia's website 18. Reinforced collaboration with suppliers particularly on Modern Slavery

Victim Support: Ensure a victim centred approach with an established support mechanism

Why?	How?
<p>Modern Slavery is a hidden and generally under reported crime, with only 1 in 5 victims in Australia being identified. The majority of victims are highly vulnerable and without power. Globally 1 in 4 victims are children and 71% are women and girls. Victims will often experience powerlessness and trauma, and consequently need ongoing support. Veolia also recognises secondary trauma may occur when working with people who are victims or reviewing material about traumatic events.</p>	<ul style="list-style-type: none"> 19. Developed a Remediation Procedure to investigate and remediate all situations where modern slavery is suspected. 20. Developed Guidelines for Working with Trafficked People and Modern Slavery Victims. 21. Maintained a system to support all Veolia employees who may experience primary or secondary trauma through the Employee Assistance Program. 22. Rolled out a “Spot the Signs” Communication Campaign

Collaboration: Improve engagement with stakeholders and build partnerships with peak bodies, NGOs and industry

Why?	How?
<p>Collaboration is key to combating modern slavery. Due to the interconnected nature of our world, civil society, consumers, governments, businesses and investors must all work together to tackle slavery. Increasing engagement and collaboration promotes learning, openness and sharing of challenges and lessons. Transparency helps us to tackle the problem, leveraging our collective capabilities.</p>	<ul style="list-style-type: none"> 23. Partnered with UN Global Compact Network Australia 24. Ensured open forums with workforce representatives such as labour hire providers and unions 25. Engaged with international stakeholders including Veolia Environnement SA to share learnings and in particular other countries where modern slavery legislation applies such as UK’s modern slavery Act and France’s Duty of Care, as well as raised awareness within Veolia Environnement SA’s supply chain and operations 26. Adhered to and promoted Veolia Environnement’s Human Rights Policy and other group norms.



CASE STUDIES - 2021

◀ Promoted our whistleblowing program to all employees.

- ◆ Veolia's whistleblowing system, available to both Veolia employees and [third parties](#), has been developed to ensure situations relating to modern slavery, among other critical subjects, are reported for investigation and resolution to an independent body: the Group Ethics Committee. Through this global system, authors of reports are able to remain anonymous if they wish.
- ◆ Third parties can alert the Group Ethics Committee through Veolia's whistleblowing system [here](#).

◀ Performed modern slavery due diligences among compliance due diligences on almost 500 third parties.

- ◆ A new Third Party Compliance Due Diligence Procedure has been implemented in 2021. The procedure is designed to drive transparency and integrity, promoting and enforcing ethical business practices across critical elements of Veolia's compliance framework including but not limited to: Human Rights / International Sanctions, Enforcements and Watchlists / Politically Exposed Persons / Corruption / Terrorism & Trafficking / Conflict Minerals / Environmental.
- ◆ In accordance with the new procedure, Compliance due diligences are embedded in the assessment of a large number of sensitive third parties in accordance with the risk mapping. These due diligences are performed internally based on information sourced by a specialised international market leader.

◀ Developed and rolled out two trainings respectively tailored to permanent employees and managers.

- ◆ Two new trainings have been rolled out across the organisation:
 - A compulsory 25 minutes training, dedicated to all permanent employees, increases Modern Slavery awareness, particularly in regards to the types and signs of Modern Slavery, highlighting what can be done to help combat it at every levels of the organisation, but also in everyone's personal life. It has been taken by 75% of the enrolled workforce in 2021 (almost 2400 employees).
 - A 15 minutes training, dedicated to all managers, equips them to understand Modern Slavery, addresses concerns and guides the response. It clearly emphasizes the critical role managers have to play in the elimination of Modern Slavery in Veolia's operations and supply chain. The Manager module, compulsory for all managers, has been taken by more than 92% of VANZ Managers (more than 610 Managers).

◀ Communicated regularly to all employees to continue to raise awareness and improved the reach.

- ◆ Throughout the year, a number of communications have been delivered to all employees including posters on sites and electronic communication ("Spot the Signs" campaign / messages in monthly newsletters / Modern Slavery Statement launch / Anti Slavery Day...).
- ◆ A Modern Slavery "Spot the Signs" campaign has also been launched on site and electronically to help employees identifying potential signs of Modern Slavery in our Operation and Supply Chain.
- ◆ A network of Modern Slavery Champions has been created across the organisation to improve the reach of the framework and provide another opportunity for employee to speak up through a more "local" network.

◀ Reinforced collaboration with suppliers particularly on Modern Slavery across the organisation.

- ◆ Putting itself on the forefront of efficient integrated procurement, Veolia uses a supplier management portal to enforce stronger collaboration with suppliers. The portal safeguards source-to-contract activities and supplier relationship management, ensuring adequate and sufficient Compliance standards, in all processes for all suppliers. As part of the supplier onboarding process through this suppliers portal, suppliers are requested, among others activities, to answer updated questions relating to Modern Slavery best practice. The initiative has been successfully extended to New Zealand in 2021.



ASSESSMENT OF EFFECTIVENESS

In FY21, Veolia's second year of reporting our modern slavery actions, the framework deployed by Veolia in regards to the 2018 Modern Slavery Act has continued to mature, taking advantage of the progress made in 2020, especially with respect to governance and steering.

In order to measure the effectiveness of our overall anti-slavery strategy and activities related to tackling modern slavery, we are regularly tracking a number of Key Performance Indicators (KPIs) aligned to the four pillars of our anti-slavery strategy.

For FY21, these KPIs continue to reflect a improved positive step in the right direction with an overall improvement of our modern slavery response throughout the year. In FY21, no modern slavery incident were identified in our operations or supply chain.

As we continue on our journey to eradicate modern slavery, we are permanently building on learnings and improving our overall framework. As such, these KPIs are regularly updated, as necessary, to ensure we permanently measure and assess the effectiveness of our all actions.

For example, here is a list of KPIs that were monitored in 2021:

◀ Internal Awareness

- ◆ Core Training Attendance
- ◆ Manager Training Attendance
- ◆ Engagement of Anti-Slavery awareness campaign
- ◆ Number of Modern Slavery incidents

◀ Supply chain awareness and due diligence

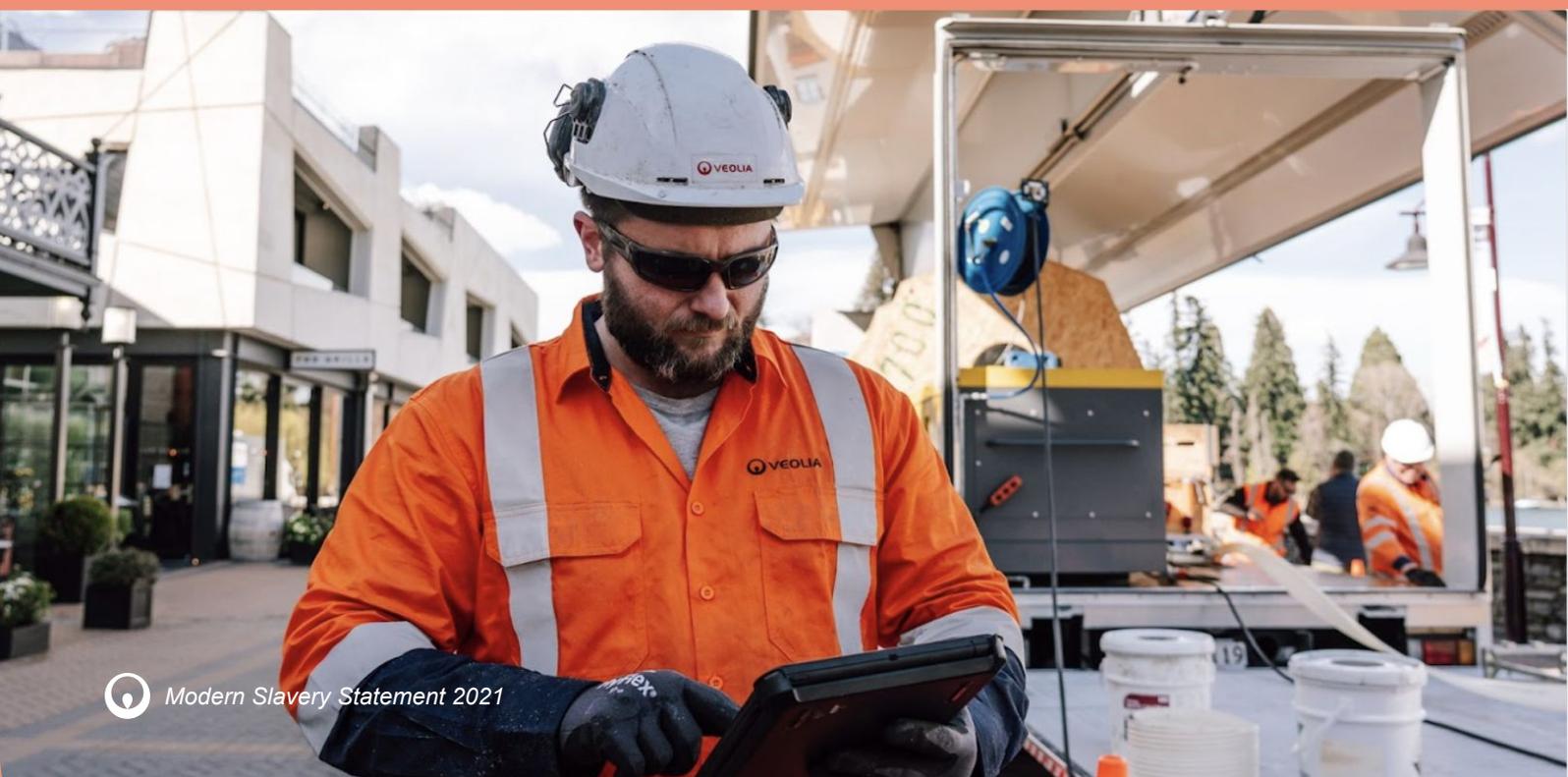
- ◆ Number of Third Party Due Diligences
- ◆ Number of Audits completed
- ◆ Continuous measurement of incidents recorded and lessons learned

◀ Victim Support

- ◆ Victim centred approach established through annual sentiment survey
- ◆ A victim-centred review mechanism to understand the lessons learned

◀ Collaboration:

- ◆ Number of interactions with the Group
- ◆ Number of partnerships with external stakeholders



CONTINUOUS IMPROVEMENT

Veolia is convinced a continuous improvement approach to tackle modern slavery is necessary. In FY22, we will pursue to monitor FY21 KPIs and update our KPIs to ensure we continue to appropriately measure and assess the effectiveness of all our actions (old and new).

However, following the acquisition, early 2022, of Suez Australia Holdings Pty Ltd, Veolia will focus on aligning Veolia and Suez respective Modern Slavery frameworks, retaining and reinforcing proven actions already in place.

Veolia will focus on the below actions in 2022 aligned to our anti-slavery strategy.

Internal Awareness: Embed Modern Slavery awareness and due diligence within business as usual activities and employees' knowledge

How?

- Deliver internal training to all Veolia employees.
- Deliver enhanced modern slavery training to all managers and roles in key risk areas.
- Raise awareness across the organisation.

Supply Chain exploratory and awareness: Increase supply chain vigilance

How?

- Update supply chain risk mapping.
- Conduct audits of identified high risk suppliers.

Victim Support: Ensure a victim centred approach with an established support mechanism

How?

- Provide effective support to victims throughout their recovery working with dedicated organisations.

Collaboration: Improve engagement with stakeholders and build partnerships with peak bodies, NGOs and industry

How?

- Engage with organisations to ensure Veolia goes beyond compliance and improve understanding of modern slavery risks.

Resourcing the world

Veolia Australia and New Zealand

veolia.com/anz

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