

Purpose

This Compliance Management Policy establishes Greater Western Water's compliance management objectives, and its commitment to maintaining a culture of compliance and articulates responsibilities in relation to compliance.

Greater Western Water's compliance management system supports the Board and the Executive team to effectively discharge their compliance related responsibilities under the Water Act 1989, Standing Directions 2018 under the Financial Management Act 1994, the General Environmental Duty under the Environment Protection Act 2017, the General Duty under the Occupational Health and Safety Act 2004 (OHS Act), the Safe Drinking Water Act 2003, the Privacy and Data Protection Act 2014, the Water Industry Act 1994 Statement of Obligations (General) issued by the Minister for Water 2015 and the Water Industry Standard – Urban Customer Service (version 4) effective from 1 July 2024, (WIS) issued by the Essential Services Commission.

Objectives

The objective of the policy is to ensure that Greater Western Water has adequate controls to ensure conformance with its obligations and encourage a committed and responsible culture of compliance. The policy will drive a preventative approach to compliance so that Greater Western Water can proactively plan to meet its future compliance objectives rather than reacting to non-conformance.

Scope

This policy applies to:

- GWW Board directors
- GWW executives and employees, contractors, consultants, labour hire employees and any individuals or groups undertaking activity for or on behalf of GWW
- 'In house' contractors, consultants, labour hire employees and any individuals or groups undertaking activity for or on behalf of GWW.
'In house' contractors and consultants mean contractors and consultants performing a GWW function, for example:
 - Undertaking work of a similar nature to work undertaken by GWW employees
 - Using or having access to GWW resources or information that is not normally accessible or available to the public; or
 - Supervising GWW employees

For ease of reading, in this policy the term "employee" is used to cover anyone the policy applies to, as set out above, regardless of their employment or engagement status.

Commitment

Greater Western Water is committed to the management and monitoring of its compliance obligations, including obligations arising from legislation, regulation, government directions or policies, industry codes and standards, as well as Greater Western Water policies and procedures.

Greater Western Water's commitment extends to actively identifying and communicating compliance obligations, providing appropriate support and resources and managing the risks of non-compliance.

Greater Western Water is committed to the performance of the compliance program through effective management reporting against key performance indicators, including in regard to the General Environmental Duty (GED), the OHS Act General Duty and compliance with the Water Industry Standards (WIS). The compliance program will be regularly reviewed, and continual improvement made through review of controls in place to meet compliance obligations.

Implementation

This policy is implemented through:

- Ensuring compliance management systems, frameworks and practices are consistent with ISO 37301:2023 *Compliance Management Systems* and maintained
- Promoting an enterprise-wide approach to compliance management by integrating it with organisational strategy, forecasting and planning, as well as decision making based on compliance risk and the monitoring function
- Identification, investigation and classification of potential or actual breaches and timely internal and/or external reporting as per relevant requirements. Regulatory reporting requirements include breaches of the Safe Drinking Water Act 2003, Environment Protection Authority operating licences and permits, General Duty under the OHS Act, Code of Conduct, privacy and WIS.
- Development, monitoring, maintenance and reporting of relevant key performance indicators to demonstrate GWW's compliance with obligations.
- Developing and fostering a commitment to compliance culture within the business that supports:
 - proactive and accountable management and decision making
 - clear ownership of compliance obligations and associated controls
 - clearly defined roles, responsibilities, and performance expectations
 - the provision of adequate resources to implement and review controls in place to meet our compliance obligations
- Identifying, risk assessing and managing Greater Western Water's compliance obligations
- Establishing a high level of awareness of our compliance obligations throughout the business through a range of communication channels and providing relevant training, education and guidance

- Enabling the design and implementation of compliance controls that are:
 - developed in accordance with the risk associated with the compliance obligation
 - cost effective and appropriate
 - documented and periodically reviewed for effectiveness, based on triggers including process and/or risk changes, legislation updates and breaches or incidents linked to a control
- Providing timely and accurate monitoring, evidence-based review and continual improvement of compliance management systems and processes

Roles and responsibilities

The Executive Leadership Team:

- Monitor the effectiveness of Greater Western Water's compliance management systems and the associated controls in place to meet compliance obligations
- Approve and authorise the Compliance Management Policy and systems.
- Oversee the management of compliance risk
- Set compliance expectations, demonstrate leadership and set a strong governance culture
- Provide leadership and demonstrate commitment to Greater Western Water's compliance management objectives
- Ensure the commitment to compliance is maintained and that non-compliance and non-compliant behaviour is managed appropriately
- Allocate adequate and appropriate resources to implement, evaluate, maintain and improve the compliance management systems within Greater Western Water
- Ensure that the responsibilities and respective delegations for relevant compliance roles are assigned and communicated

Head of Risk and Resilience:

- Implement and manage the Compliance Management Policy and systems
- Develop and maintain Greater Western Water's Risk Management and Compliance Management Frameworks and systems (including oversight of breach reporting and exemptions), provide technical risk management and compliance support and training and associated tools and practices
- Report to management and the Audit Risk and Assurance Committee on compliance management
- Coordinate and support the establishment, ongoing maintenance and update of risks and compliance obligations for all areas of the business
- Develop, implement and maintain a risk-based compliance assurance (control testing) program
- Coordinate the attestation process, breach reporting and any associated actions
- Assisting areas to address issues in relation to breaches for rectification, control and risk re-assessment and continuous improvement
- Identify new and amended compliance obligations and consult with relevant areas on their applicability and update compliance systems accordingly

Senior Leadership team

- Cooperate with and support the compliance function and encourage employees to do the same.
- Ensure control owners implement controls and gather evidence of effectiveness.
- Comply with compliance obligations and associated policies, procedures and processes and attend and support compliance training activities.
- Identify and communicate compliance risks in their operations and develop employee awareness of the relevant compliance obligations and controls in place to address them.

Compliance Officer

- Ensure the Compliance Program is effectively designed, implemented and maintained

All employees:

- Be aware of and comply with compliance obligations relevant to their roles and responsibilities.
- Adhere to policies, procedures and controls required in their role and incorporate compliance management practices into their workplace activities.
- Attend and complete appropriate compliance training and accreditation.
- Identify and report compliance concerns, issues and incidents in a timely manner to the Compliance Officer.

References and related documents include but are not limited to:

Legislation and Legislative Instruments

Environment Protection Act 2017

Safe Drinking Water Act 2003

Financial Management Act 1994

Standing Directions 2018 under the Financial Management Act 1994, Department of Treasury and Finance, approved 11 October 2018, updated September 2023

Water Act 1989

- Greater Western Water Instrument of Delegation under the Water Act 1989, 10 July 2025

Water Industry Act 1994

- Water industry Standard – Urban Customer Service V4, 1 July 2024
- Statement of Obligations (General) issued by the Minister for Water 2015

Privacy and Data Protection Act 2014

Greater Western Water Policies and Frameworks

Doc Name: Compliance Management Policy

Owner: Head of Risk and Resilience

Approver: ELT Billing Enforceable Undertaking Steering Committee

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Greater Western Water Health, Safety, Environment and Quality Policy

Greater Western Water Asset Management Policy

Greater Western Water Risk Management Policy

Greater Western Water Compliance Management Framework

Greater Western Water Code of Conduct Policy

Business Systems Standards

ISO 37301:2023 Compliance Management Systems – Guidelines

Review Process

The policy will be reviewed every two years or more frequently as required.

Approved by the ELT on 10 December 2025

Next due for review by ELT in December 2026

Version control table

Version No.	Doc Owner	Change / Update	Date
1.0	Manager, Compliance, Emergency Management and Systems	New policy endorsed for Greater Western Water	14 Oct 2021
2.0	Head of Risk and Resilience	Amended for ISO 37301:2023 and other updated governing documents.	27 July 2023
3.0	Head of Risk and Resilience	Amended to reflect focus on control effectiveness and for other updated governing documents.	17 July 2025
4.0	Head of Risk and Resilience	Amended to reflect Enforceable Undertaking commitments	10 Dec 2025

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