

2023 – 24

ADDRESSING MODERN SLAVERY RISKS IN OUR BUSINESS

OUR MODERN SLAVERY STATEMENT





Our commitment

At Icon Water, we respect human rights and consider modern slavery in any form to be unacceptable.

We are committed to providing an environment free from modern slavery, and working with our suppliers to identify and eradicate any modern slavery throughout their operations and supply chains.



Message from our Board Chair and Managing Director

No sector is immune to the risks of modern slavery and it is essential we continue to address this global issue. Modern slavery, which includes forced labour, human trafficking, and exploitation, is a grave violation of human rights that affects millions of people worldwide, often hidden within complex supply chains.

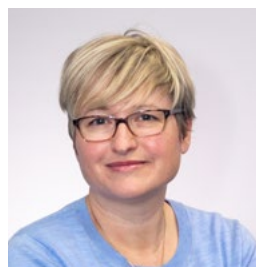
Icon Water is committed to combatting modern slavery. To uphold our values of community, care, courage, and connection, we must be vigilant in ensuring our operations and supply chains are free from any forms of exploitation. To achieve this, we have implemented a framework of policies, training, capacity building, and due diligence initiatives.

Understanding the risks within our supply chain is fundamental; to this end, we have undertaken a comprehensive desktop review of our high-risk suppliers. This crucial step in our due diligence process enables us to prioritise further investigations and engagement with those suppliers.

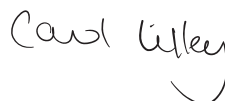
We continue to actively collaborate with the Water Services Association of Australia (WSAA) modern slavery community of practice. By working with industry peers, we aim to develop and implement best practice that safeguards human rights and promotes ethical labour standards across the industry. This collaboration is crucial for identifying risks, sharing knowledge, and creating a united front against modern slavery.

To date we have not identified any instances of modern slavery in connection to our business – but we understand that the fight against modern slavery is a shared, and ongoing, responsibility.

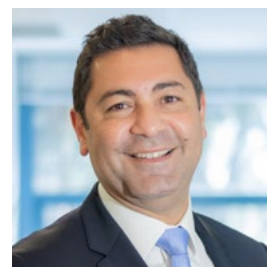
On behalf of the Board and Executive, we are pleased to present our 2023–24 Modern Slavery Statement approved on 12 December 2024.



Carol Lilley



**Chair
Icon Water**



Ray Hezkial



**Managing Director
Icon Water**

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Acknowledgement of Country

Icon Water acknowledges the traditional custodians of the ACT region, the Ngunnawal people, and also recognises other people or families with connection to the ACT and region. We pay our respects to their Elders – past, present and emerging. We recognise and value their continuing culture and the contribution they make to the life of the city and the region. We also acknowledge the First Peoples of the broader region in which we live and work.

OUR BUSINESS

Icon Water is the ACT's provider of essential water and wastewater services and has proudly served the Canberra community for over 100 years. We are committed to supporting public health, enhancing liveability, and contributing to the future prosperity of our region. Our responsibilities include sourcing, treating, and supplying water to Canberra and Queanbeyan, and managing wastewater services for Canberra.

We manage and operate a network of dams, water treatment plants, sewage treatment plants, reservoirs, pumping stations, pipes, and other critical infrastructure, with an asset base valued at approximately \$3.4 billion. Additionally, we hold a

significant investment of around \$1 billion in the ActewAGL joint venture, which operates in the energy sector.

As a Territory-owned corporation, Icon Water has four objectives under the *Territory-owned Corporations Act 1990*:

- to operate at least as efficiently as any comparable business
- to maximise the sustainable return to the territory on its investment in Icon Water and ActewAGL in accordance with the performance targets in our Business Strategy (Statement of Corporate Intent)

- to show a sense of social responsibility by having regard to the interests of the community in which we operate, and by trying to accommodate and encourage those interests
- where our activities affect the environment, to effectively integrate environmental and economic considerations in decision-making processes.

These objectives drive our strategic planning and the development of our vision and business strategies.

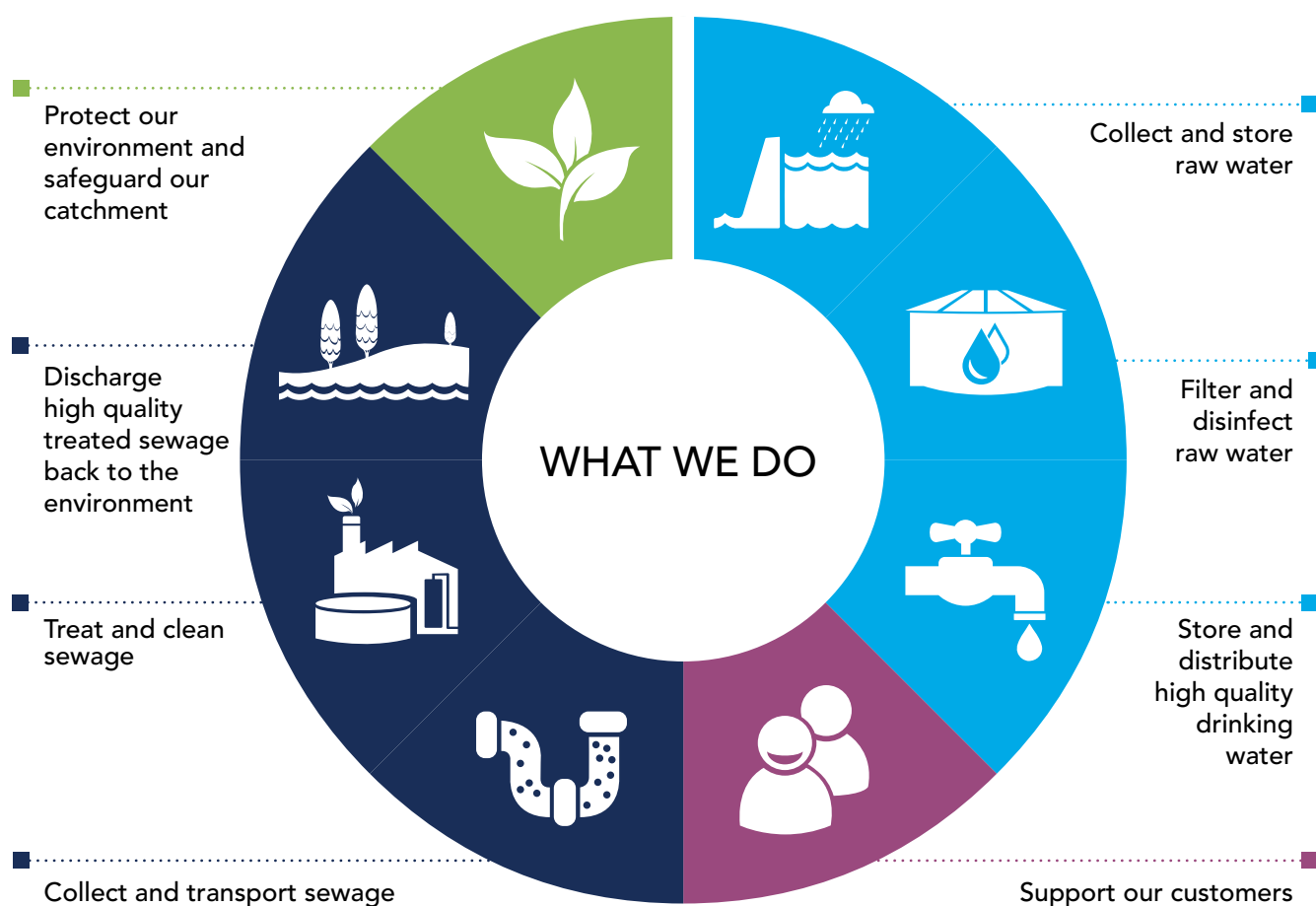


Figure 1 What we do at Icon Water

OUR ASSETS

\$3.4 billion

of water and wastewater related assets



278 GL

Combined
dam capacity



3,400km

Network
of water pipes



25

Water
pumping
stations



2

Water
treatment
plants



50

Reservoirs



3,400km

Network
of sewer
pipes



27

Sewage
pumping
stations



4

Sewage
treatment
plants

Figure 2 Icon Water's assets

OUR STRUCTURE

Icon Water is an unlisted public company owned by the ACT Government. As a territory-owned corporation, we operate independently from the direct functions of government and are governed by an independent board of directors responsible for governance, strategic oversight, and decision-making. The two Voting Shareholders are the ACT Chief Minister and the ACT Minister for Water, Energy and Emissions Reduction.

Icon Water's structure

Icon Water's operations are structured into six groups, each led by an executive. As at 30 June 2024, we employed 483 people (447 full time equivalent), with all employment conditions governed by Australian workplace legislative requirements. We review our organisational profile and staffing requirements as part of our regular budget planning process to ensure our operations remain prudent and efficient.

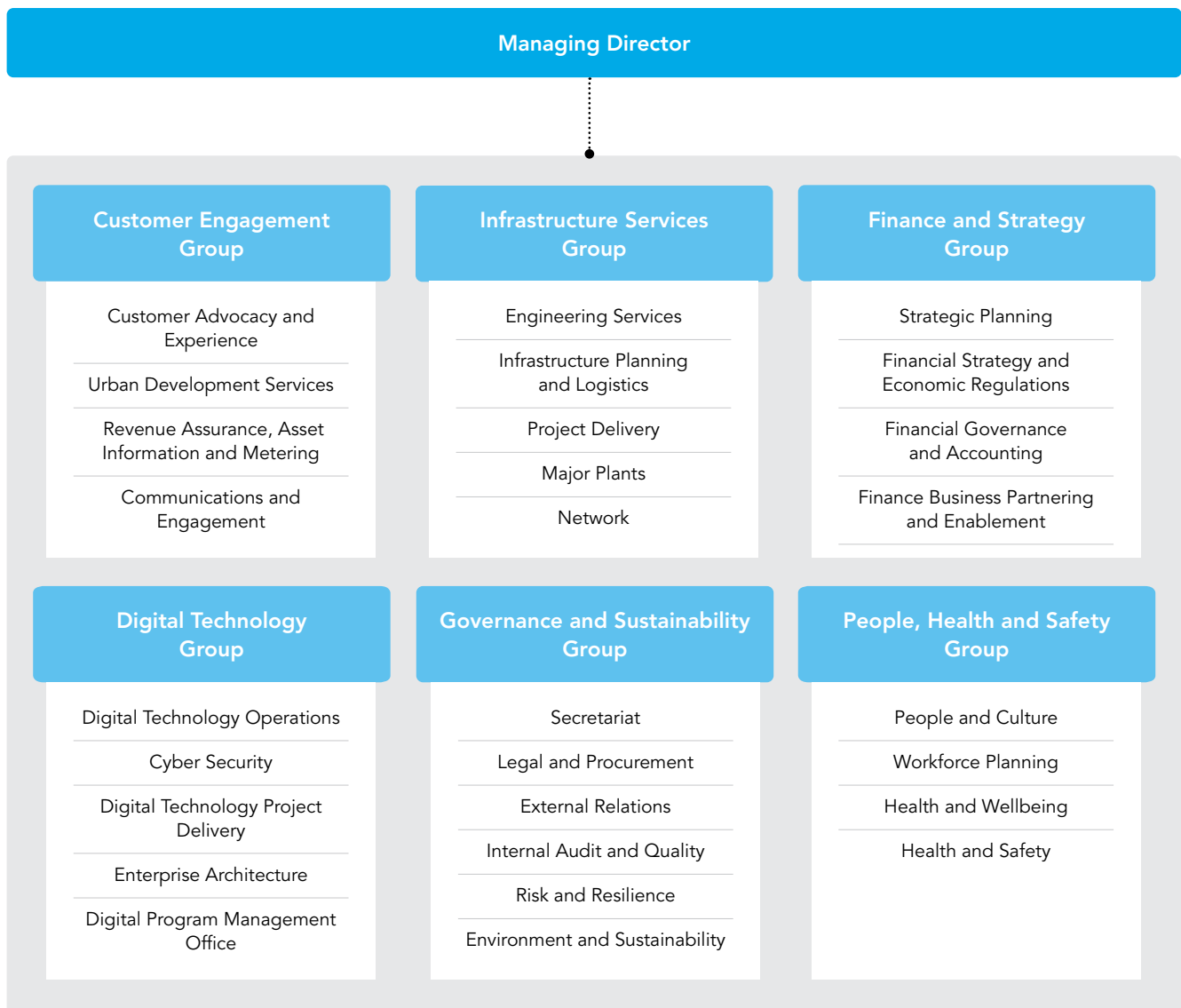


Figure 3 Icon Water's organisation chart

ActewAGL joint venture

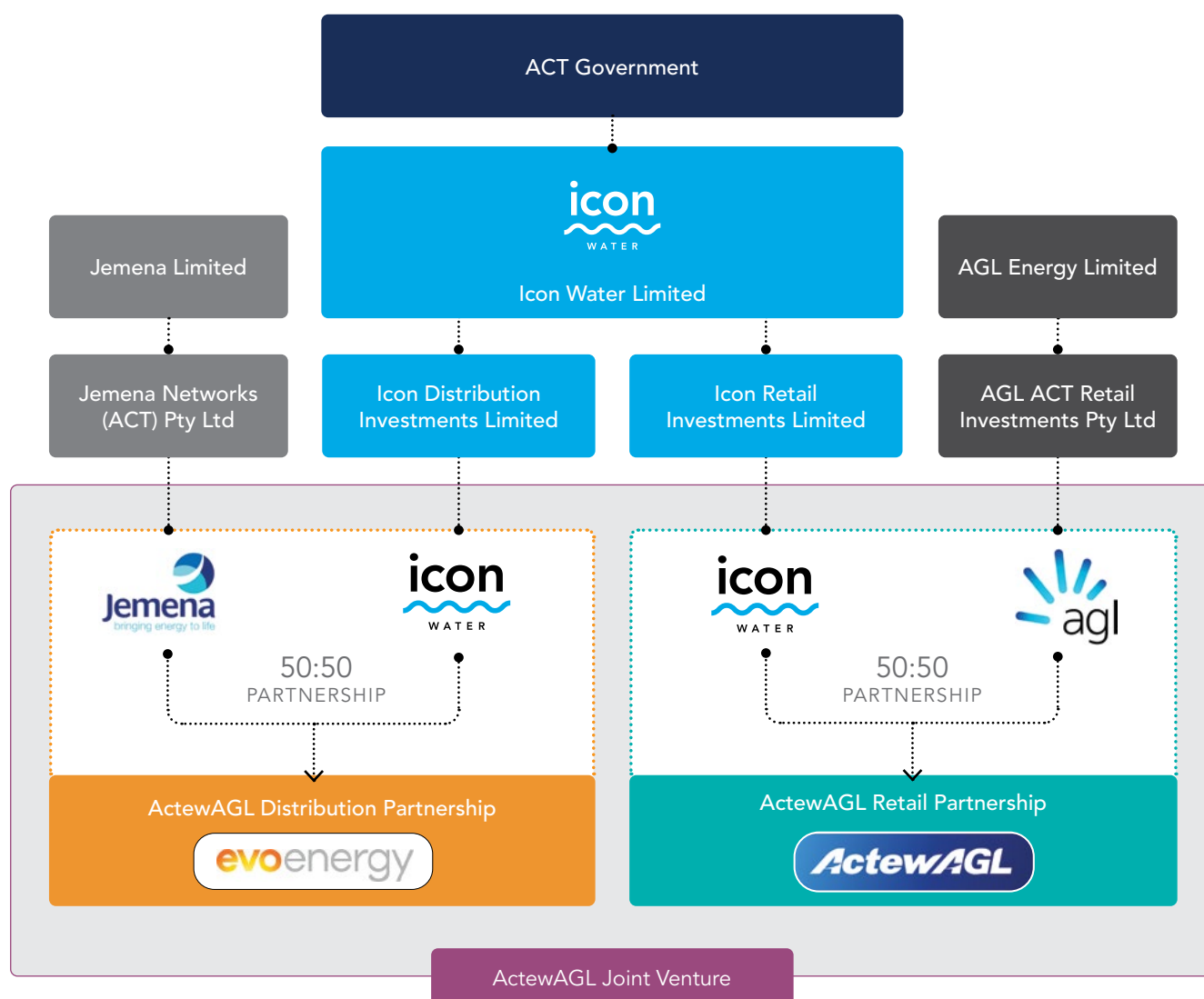
In addition to providing water and wastewater services, Icon Water manages an investment in the ActewAGL joint venture, which delivers energy services to the ACT and surrounding regions.

Formed in October 2000, the joint venture between Icon Water (formerly ACTEW Corporation) and Australian Gas Light Company (AGL) resulted in ActewAGL, Australia's first multi-utility public private partnership. The joint venture consists of two partnerships: ActewAGL Distribution and ActewAGL Retail. Icon Water participates in both partnerships

through its subsidiary companies, Icon Distribution Investments Limited and Icon Retail Investments Limited. The eight Directors of Icon Water are also directors of our subsidiary Boards.

ActewAGL Distribution, operating under the brand 'Evoenergy', owns and operates the electricity network in the ACT, and the gas network in the ACT, Queanbeyan and Shoalhaven in New South Wales. This partnership includes Jemena Limited and Icon Water via its subsidiaries.

ActewAGL Retail sells electricity and natural gas, managing customer service and marketing functions in a competitive market. Its service area includes centres such as Queanbeyan, Goulburn, Yass, Young, Nowra and Bega, and it is a partnership between AGL Energy Limited and Icon Water via its subsidiaries.



Notes: 1) Each of Jemena Networks (ACT) Pty Ltd, Icon Distribution Investments Limited, Icon Retail Investments Limited and AGL ACT Retail Investments Pty Ltd are wholly owned subsidiaries of Jemena Limited, Icon Water Limited and AGL Energy Limited respectively. 2) Jemena Networks (ACT) Pty Ltd and Icon Distribution Investments Limited are equal partners in the ActewAGL Distribution partnership (AAG). AAG includes energy networks (Evoenergy) and corporate services. 3) Icon Retail Investments Limited and AGL ACT Retail Investments Pty Ltd are equal partners in the ActewAGL Retail Partnership (AAR).

Figure 4 Joint venture structure and energy investment brands

CONSULTATION WITH CONTROLLED ENTITIES

In our commitment to combat modern slavery, we prioritise effective communication with our controlled entities as part of the ActewAGL joint venture. Our joint venture partners also document their modern slavery practices through their own modern slavery statements, including in the ActewAGL Modern Slavery Statement.

In 2023–24 a key component of our consultation was sharing valuable insights and information gained from our various industry collaborations. We shared our experiences with modern slavery supplier platforms, which are increasingly being used to support businesses to identify, assess, and mitigate risks within supply chains, and heard from our joint venture partnerships about the challenges and successes they were experiencing. These discussions have increased our collective capabilities and our organisational maturity in improving our modern slavery practices.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

Modern slavery refers to the exploitation of individuals through forced labour, debt bondage, human trafficking, and other forms of coercive labour practices. Unfortunately, it exists in every country, including Australia. Because modern slavery is often concealed within complex supply chains and operations, it is not always visible or obvious.

The level of modern slavery risk in our operations and supply chains is influenced by factors such as geographic location, industry sector, and the type of products being procured. We integrate these variables into our risk assessment processes to ensure a thorough evaluation of potential vulnerabilities is made.

In 2023-24, we procured a wide variety of goods, works and services from approximately 850 suppliers, 97 percent of which are based in Australia. Certain categories of procurement pose a higher risk for modern slavery than others, for example due to the geographic location of the supplier (or the Tier 2 supplier) or industry sectors. We have identified these higher-risk suppliers and have established processes to ensure modern slavery risks can be better identified, assessed and addressed.

Our procurement processes require our suppliers to satisfactorily address the risk of modern slavery within their own operations and supply chains. These efforts are underpinned by five key principles that guide our commitment to ethical sourcing and responsible supply chain management.



Figure 5 Key principles for ethical sourcing and responsible supply chain management

Our main categories of procurement include:

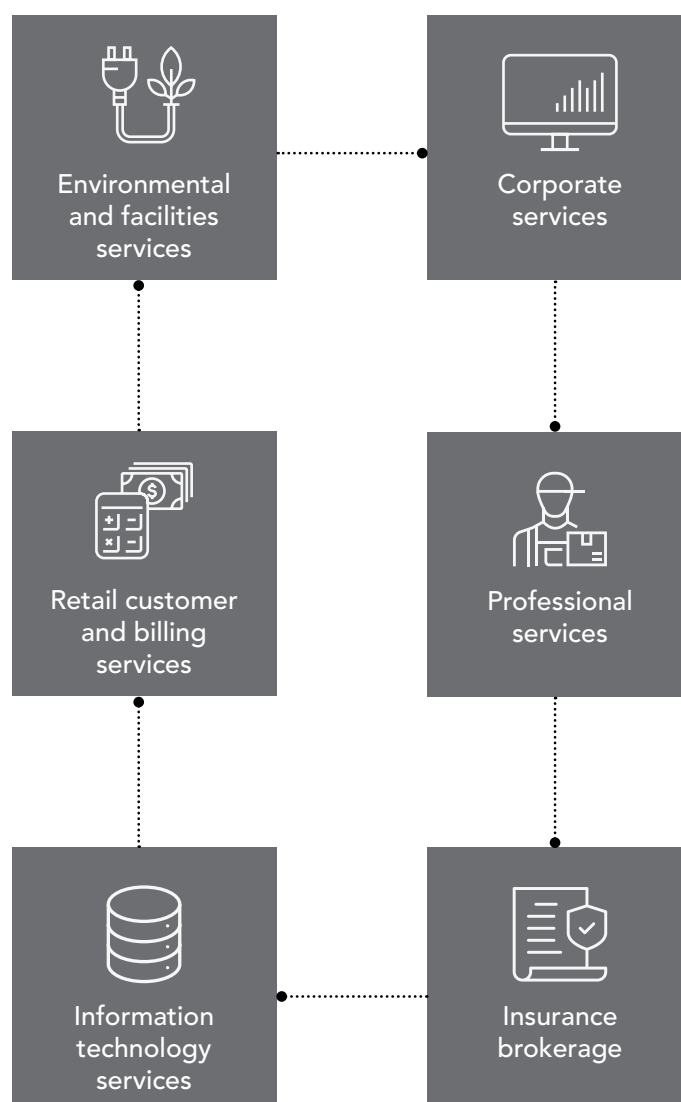


Figure 6 Our main categories of procurement

Within our supply chain, the areas with an elevated risk of Icon Water causing, contributing to or being directly linked to modern slavery include:

- **Apparel:** This includes gloves, vests, overalls, personal protective equipment (PPE), and corporate clothing. These items are associated with complex supply chains and the use of low-skilled labour, which increases the risk of modern slavery.
- **Electronics:** The risk in this category arises from the raw materials used in electronics, which are often linked to forced labour and poor working conditions in manufacturing facilities.

These risks have not significantly changed since the previous reporting period, but we continue to assess and evaluate them. We remain vigilant in implementing our procedures and controls to mitigate any new or increased risks we identify.

Actions to address modern slavery risks in 2023–24

Our work to address the modern slavery risks in our operations and supply chains are organised into three categories: policies and publications, training and capacity building, and supply chain due diligence. In 2023–24 we implemented new initiatives across all three categories:

Policies and publications

Our governance framework includes comprehensive guidance to support our modern slavery response. We clearly define the standards we expect from our employees and suppliers in addressing modern slavery risks. We regularly review and update our processes and documentation to ensure they remain effective and relevant.

In 2023–24, we expanded our whistleblower hotline and policy to explicitly include reports related to modern slavery. This enhancement means employees, suppliers, and other stakeholders can confidentially report any concerns or suspicions of modern slavery within our operations and supply chains. This enhancement has strengthened our ability to detect and address modern slavery risks promptly and effectively.

We also updated our procurement processes by developing new guidance focused on modern slavery. This guidance provides our business with information to support their identification and assessment of modern slavery risks during the procurement process. It is an important resource that has improved alignment between our procurement processes and our commitment to address modern slavery risks within our supply chains.

Training and capacity building

Through training and capacity building we are raising awareness of modern slavery, educating stakeholders, and strengthening our internal capabilities to identify and respond to modern slavery risks. This year, a key focus was collaboration. We worked closely with industry partners to share best practice ideas, successes and opportunities. We enhanced our collective understanding, and fostered a more unified approach to addressing modern slavery.

We conducted a thorough review of our modern slavery training modules to assess their effectiveness and relevance. This evaluation identified several opportunities to enhance the content, delivery methods, and engagement strategies within the modules. Through this process we are ensuring our training continues to align with our commitment and regulatory requirements.

Supply chain due diligence

Our supply chain due diligence involves a series of proactive measures to identify, assess, and mitigate modern slavery risks within our supply chain. By implementing these measures, we aim to uphold ethical standards, protect vulnerable workers, and ensure that our supply chain remains free from exploitation and coercive labour practices.

In 2023–24, we collaborated with the Water Services Association of Australia (WSAA) modern slavery community of practice to develop a modern slavery supplier questionnaire. This collaborative effort ensures that the questionnaire addresses industry-specific risks and practices, brings together the broad expertise and perspectives of many water utilities, promotes consistency in evaluating supplier compliance, and strengthens collective efforts to combat modern slavery across water industry supply chains.

We also conducted a desktop review of the risk ratings for our top one hundred suppliers to assess their potential exposure to modern slavery risks. This review involved analysing various factors such as geographic location, industry sector and product type to determine the level of risk each supplier poses. The findings from this review will inform our ongoing due diligence efforts and help prioritise engagement with suppliers who require further scrutiny and support to address modern slavery risks effectively.



ASSESSING OUR EFFECTIVENESS

Regularly assessing the effectiveness of our strategies to address modern slavery is an important step and essential for continuous improvement.

In 2023–24 we assessed our effectiveness by:

- maintaining a modern slavery working group with representatives from across the business to drive our efforts and share insights
- conducting an annual review of our approach and response to modern slavery risks, ensuring our strategies remain relevant
- tracking the actions taken to address modern slavery risks, to understand what works and where improvements are needed
- providing regular reports to the Icon Water Board through the Risk and Assurance Committee, ensuring transparency and accountability at the highest levels of our organisation.

Looking ahead

Addressing modern slavery effectively in our operations and supply chains is an ongoing process that requires dedication, collaboration, and continuous improvement. Our approach will continue to evolve as we refine our processes and build capacity within our business.

In 2024–25, we will remain vigilant in monitoring the potential risks of modern slavery within our operations and supply chain and will actively seek opportunities to enhance our monitoring and response mechanisms.

We have identified the following key priorities for the year ahead:

- **Update training materials:** we will update our modern slavery training materials to reflect the latest best practice, regulations and emerging risks. We will also provide refresher training to all relevant employees. This training will reinforce key concepts, ensure ongoing awareness, and equip our teams with knowledge and skills to effectively identify and respond to modern slavery risks.
- **Target high risk suppliers:** we will focus on our medium risk suppliers and engage with them around the completion of our modern slavery supplier questionnaire, prepared in consultation with our water industry modern slavery community of practice. This targeted approach will allow us to gather detailed information on their practices, assess their level of compliance with anti-modern slavery standards, and identify any potential risks within their supply chains.
- **Collaborate with the water industry:** we will continue to work closely with the water industry to address modern slavery risks, to drive greater efficiency and effectiveness across the sector. This collaboration will help deliver a consistent and coordinated approach to managing modern slavery risks, ensuring that our collective efforts are more effective and streamlined.
- **Remain vigilant to incidents:** we will remain vigilant and proactive in addressing any occurrences of modern slavery. This includes taking immediate action to investigate any reported, actual, or suspected incidents of modern slavery within our operations or supply chains, ensuring that all concerns are examined and addressed.

Principal Registered Office

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TTY for Hearing Impaired

133 677

Language assistance

13 14 50, 24 hours

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