

2022 – 23

# 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

We are pleased to present Icon Water Limited's modern slavery statement for 2022–23.

We reaffirm our unwavering commitment to ensuring modern slavery does not exist within our operations and supply chain, now and in the future.

Our approach to modern slavery is structured around three key streams: policies and publications; training and capacity building; and supply chain due diligence. Each stream is detailed separately in this statement.

During 2022–23, we continued to work collaboratively within the water industry, educate ourselves further about modern slavery and put transparent systems in place to mitigate risks.

To date we have not identified any instances of modern slavery in connection to our business. Despite this, we remain focused on understanding and assessing risks associated with our operations and supply chain. We also recognise the importance of having clear and rigorous procurement processes in place, and measures to address issues should they become known.

We are proud of the progress we have made, and we look forward to building on our response to modern slavery, communicating our progress and helping drive meaningful change within the water industry.

The Icon Water Limited Board approved this statement on 14 December 2023.



Wendy Caird

A handwritten signature in black ink that reads "Wendy Caird".

Chair  
Icon Water



Ray Hezkial

A handwritten signature in black ink that reads "R Hezkial".

Managing Director  
Icon Water

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## Acknowledgement of Country

Icon Water acknowledges the Ngunnawal people as traditional custodians of the ACT and recognise any other people or families with connection to the lands of the ACT and region. We acknowledge and respect their continuing culture and the contribution they make to the life of this city and this region.

## OUR BUSINESS

Icon Water is the ACT's supplier of essential water and wastewater services, and has been part of the Canberra community for more than 100 years.

We are proud to support the public health, liveability and future prosperity of our region by sourcing, treating and supplying water to Canberra and Queanbeyan, and managing Canberra's wastewater services.

We manage the region's network of dams, water treatment plants, sewage treatment plants, reservoirs, water and sewage pumping stations, pipes and other related infrastructure – an asset base valued at around \$3.4 billion. We also

manage an investment, valued at around \$1.0 billion, in the ActewAGL joint venture operating 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.

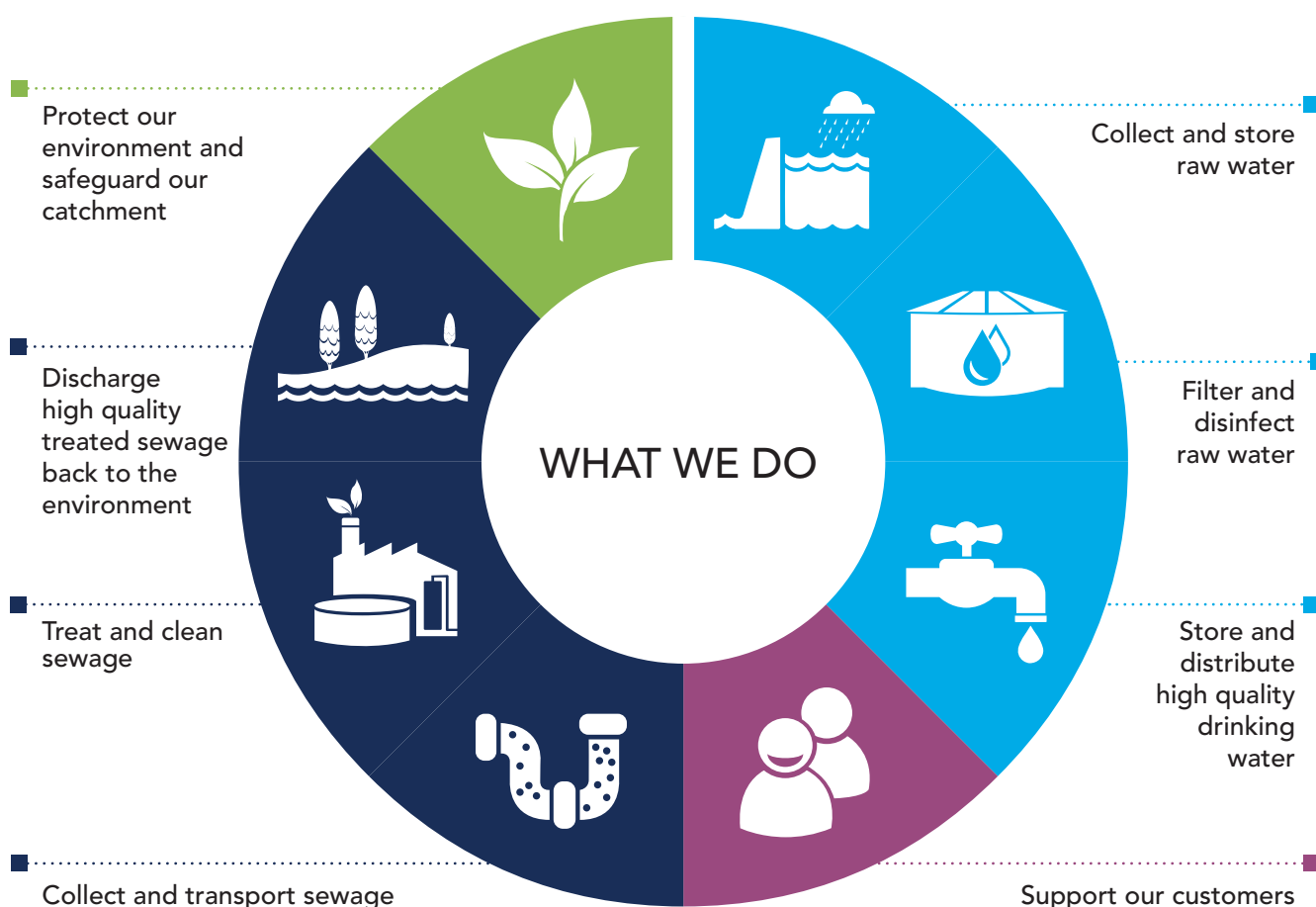


Figure 1 What we do at Icon Water

## 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 are separate from the direct functions of government and governed by an independent board of directors who exercise a governance, strategic and oversight role. There are two Voting Shareholders: the ACT Chief Minister and the ACT Minister for Water, Energy and Emissions Reduction.

## Icon Water’s structure

Icon Water’s operations are made up of six groups, each led by an executive. As at 30 June 2023, we had 450 employees (447 full time equivalent), with employment conditions governed by, and in accordance with, Australian workplace legislative requirements. We review our organisational profile and staffing requirements as part of our regular budget planning to ensure our operations remain prudent and efficient.

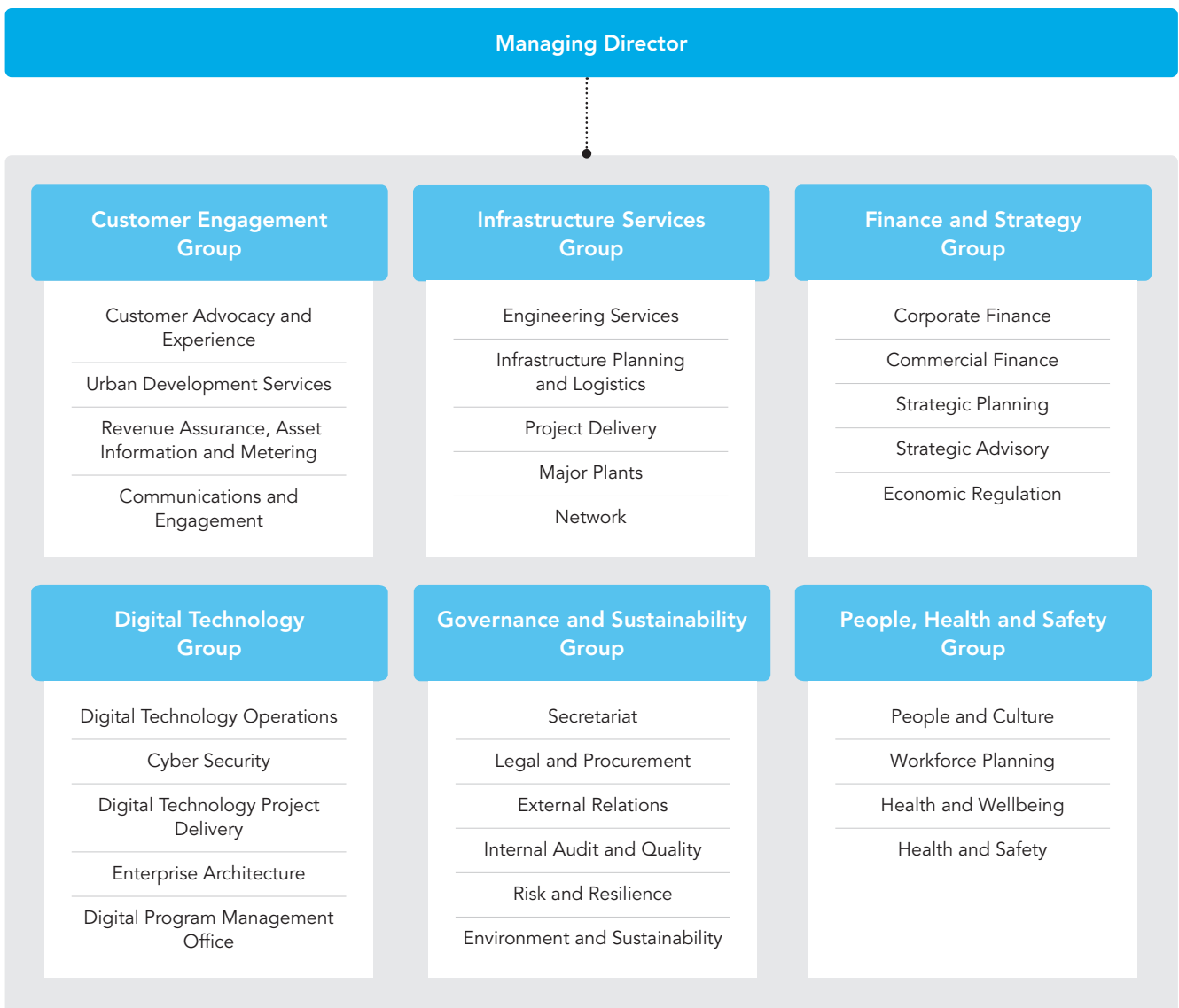


Figure 3 Icon Water’s organisation chart



## ActewAGL Joint venture

As well as providing water and wastewater services, we also manage an investment in the ActewAGL joint venture to provide energy services to the ACT and surrounding regions.

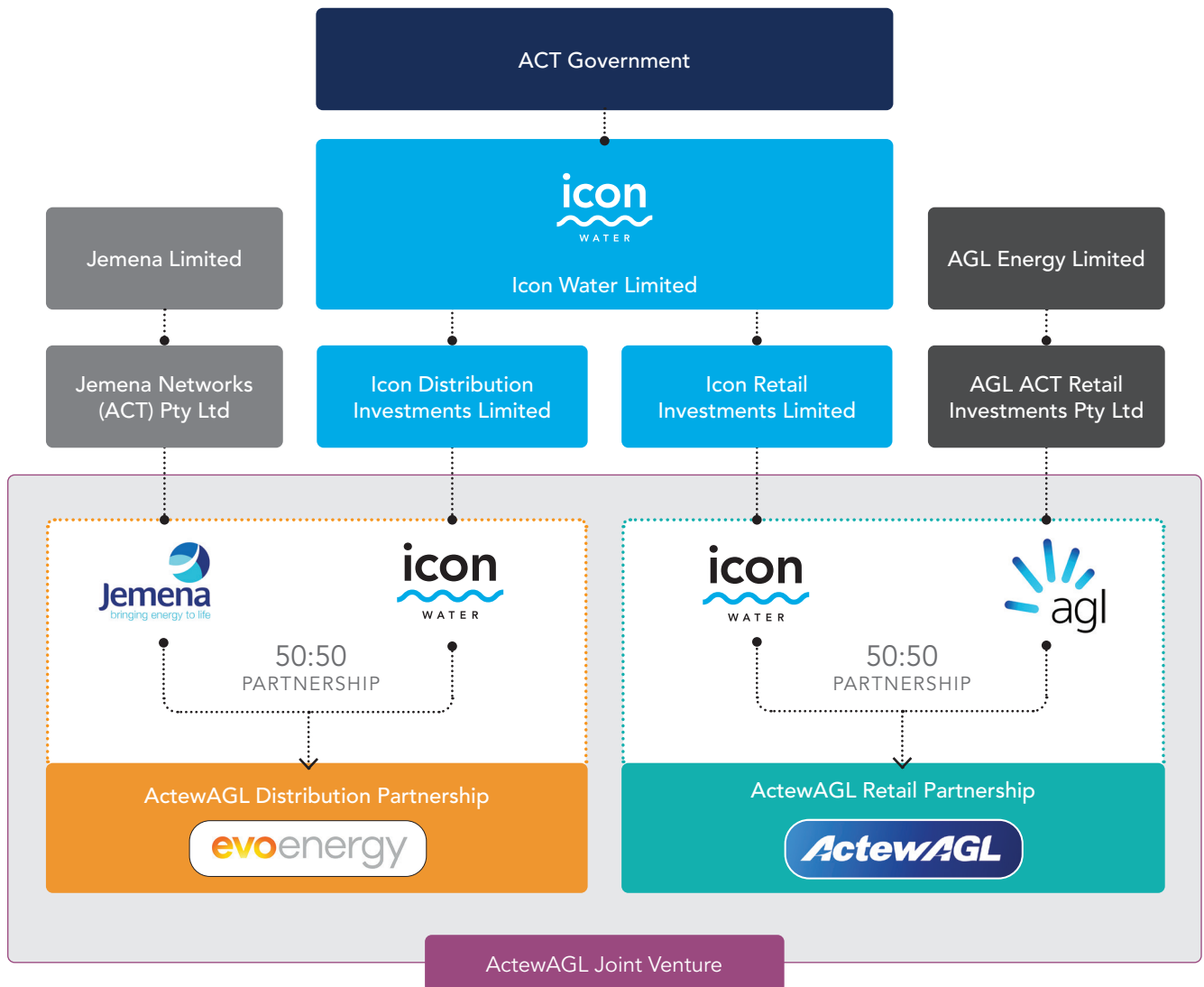
This joint venture was formed in October 2000 between Icon Water (previously ACTEW Corporation) and Australian Gas Light Company (AGL). The result was ActewAGL – the first multi-utility operating as a public private partnership in Australia.

The joint venture comprises two partnerships, ActewAGL Distribution and ActewAGL Retail, with Icon Water participating in both

partnerships through two subsidiary companies: Icon Retail Investments Limited and Icon Distribution Investments Limited. The eight Directors of the Icon Water Board sit on both of these 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 region and Shoalhaven in New South Wales. It is a partnership between Jemena Limited and Icon Water via subsidiary companies.

ActewAGL Retail sells electricity and natural gas, and manages customer service and marketing functions in a competitive market. The service footprint extends to centres such as Queanbeyan, Goulburn, Yass, Young, Nowra and Bega. It is a partnership between AGL Energy Limited and Icon Water via subsidiary companies.



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 (AAD). AAD 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

Icon Water’s work in the modern slavery space includes consultation with Joint Venture partners. These entities also document and manage their modern slavery risks via their own Modern Slavery Statement.

In 2022–23, we held specific discussions focused on our collaborative approaches with industry to assess supply chain risks using a modern slavery supplier platform. We also consulted more broadly in a way that fosters open communication and allows us to share progress and learnings so we are all effectively identifying and responding to modern slavery risks.

## 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. It exists in every country in the world, including Australia – the [Global Slavery Index](#) published by Walk Free in July 2023 estimated there were 41,000 people in Australia currently living with modern slavery.

Modern slavery is often hidden within complex supply chains and operations – it’s not always immediately obvious – and therefore

has the potential to exist in our business. This is why it is crucial to identify and carefully analyse the risks of modern slavery for Icon Water.

The level of modern slavery risk in our operations and supply chains is influenced by a range of factors, including geographic, sector and product-specific, and we incorporate these considerations into our risk assessment processes.

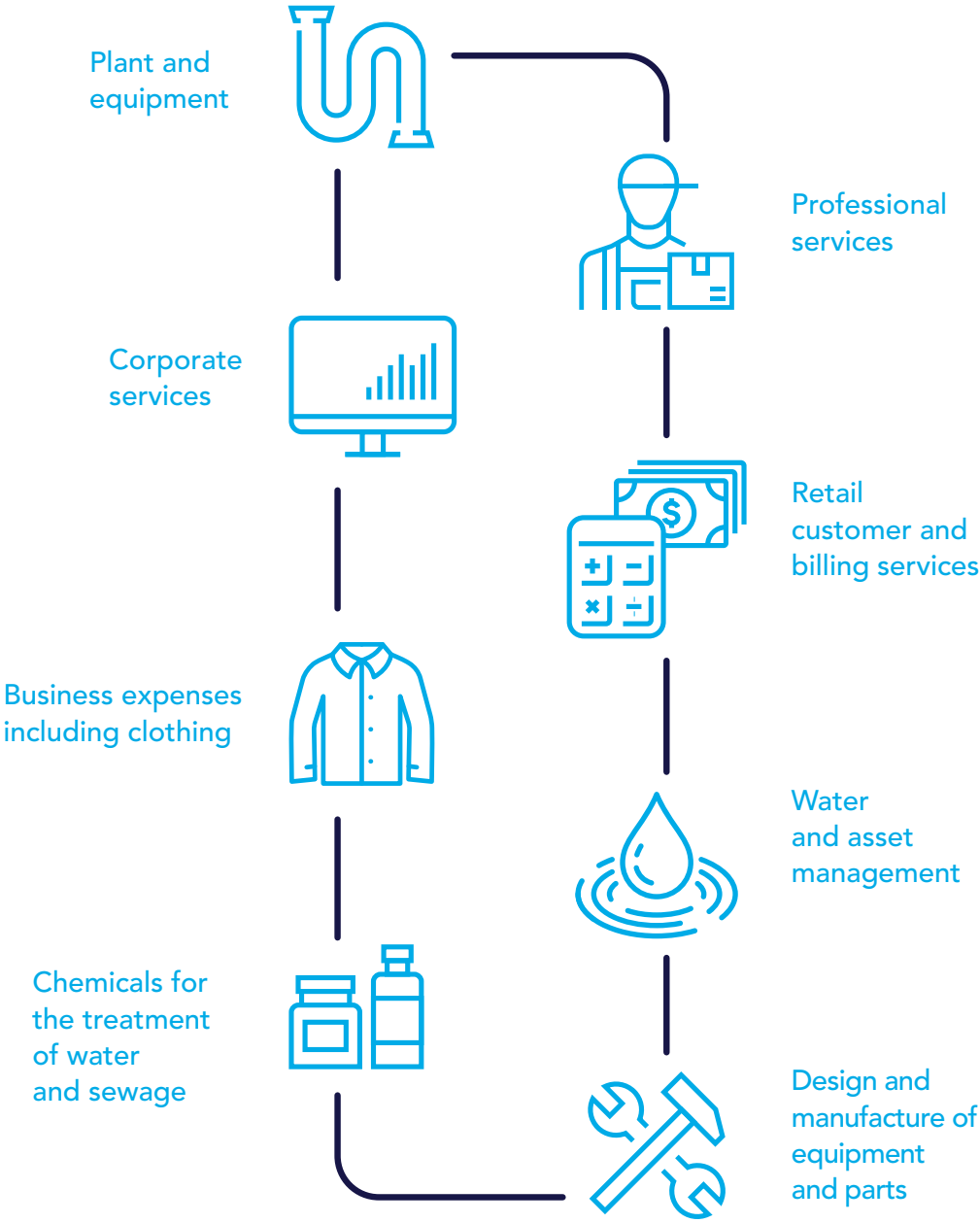
We procure a large variety of goods and services as part of our business operations – our supply chain

consists of approximately 2,500 suppliers, and more than 99 per cent of these suppliers are based in Australia. However, while using predominantly Australian suppliers provides *less* risk, it does not provide *no* risk of unwittingly supporting modern slavery – both because modern slavery does exist in Australia, and because many of our suppliers engage staff and procure products from other countries.

**In response, our procurement processes require all suppliers to satisfactorily address the risk of modern slavery in their businesses and supply chains. Five key principles underpin our procurement activities.**



Our main categories of procurement include:



The areas where there is an elevated risk of Icon Water causing, contributing to or being directly linked to modern slavery include:

- apparel (gloves, vests, overalls, personal protective equipment (PPE) and corporate clothing) due to complex supply chains and low skilled labour
- electronics as a result of the raw materials used being 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, and ensure we implement our policies, procedures and controls to mitigate any new or increased risks we identify.

# OUR APPROACH

Addressing modern slavery is an ongoing process. By following this approach and integrating it into our culture and operations, we can make an impact in combatting modern slavery and promoting ethical practices throughout our supply chain and operations.

Modern slavery is a multifaceted challenge that requires a comprehensive and systematic response. Our approach is three-phased, as outlined in Figure 5, and is underpinned by our vision of being a valued partner in our community.

As of the end of 2022–23, we are part-way through Phase 2, with seven out of the ten elements complete, indicated by a green circle and a tick.

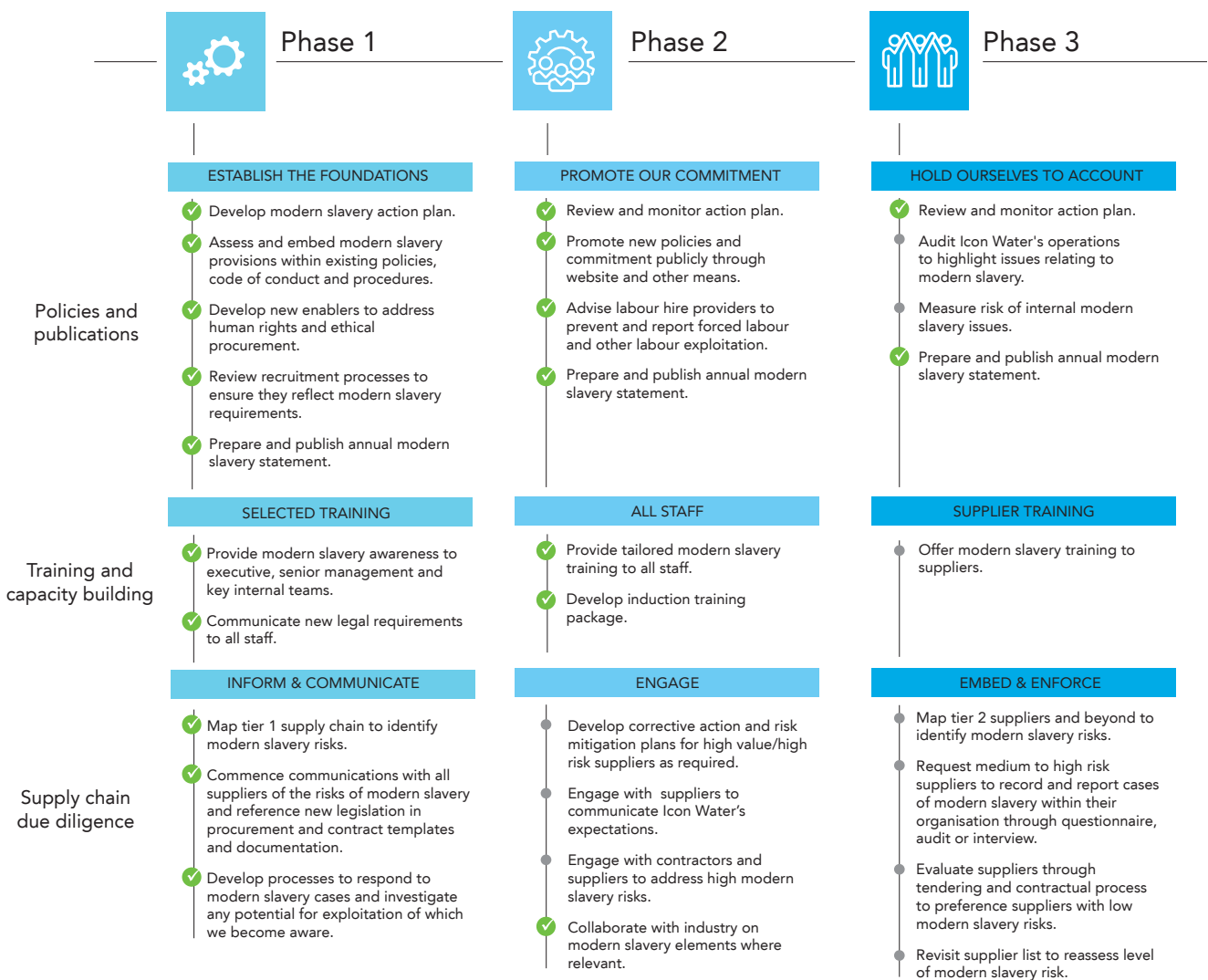


Figure 5 Icon Water's approach to modern slavery

# Actions to address modern slavery risks in 2022–23

As per Figure 5, our work to address the modern slavery risks in our operations and supply chains falls into three categories – policies and publications; training and capacity building; and supply chain due diligence.

This work is managed via our modern slavery working group, which meets every two months and has representation from across the business. The initiatives we implemented in 2022–23 to strengthen our oversight and understanding of the risks of modern slavery are outlined below.

## Policies and publications

We have comprehensive internal policies and publications to support our modern slavery response. These policies clearly articulate the standards we expect from our people, our suppliers and our business partners when addressing modern slavery risks and are reviewed regularly.

In 2022–23 we also provided input into the Australian Government's review of the *Modern Slavery Act 2018* (Cth). This occurred via our involvement in the Water Services Association of Australia (WSAA) Modern Slavery Community of Practice (COP), which is a collaborative working group of water utilities in Australia.

The objective of the review was to consider the operation of the Act, look at how it could be improved, and explore ways to monitor compliance. The WSAA Modern Slavery COP was able to provide practical feedback on the operation of the Act and address areas of concern in the review.

## Training and capacity building

Training and capacity building helps raise awareness of modern slavery, educate stakeholders and build the knowledge and skill necessary to prevent modern slavery and respond to modern slavery risks. This year a key component of our training and capacity building work was collaboration.

In 2022-23, we have, and will continue, to work with the WSAA Modern Slavery COP to share knowledge; identify and contribute to the development of good-practice responses; improve our awareness of modern slavery and its effects; and contribute to and drive transparency of modern slavery in our industry. Our participation also allows us to evaluate whether our initiatives are in line with industry and societal expectations.

Members of our modern slavery working group improved their knowledge by attending the National Government Modern Slavery Conference in June 2023. The conference facilitated the exchange of information, ideas and experiences among diverse stakeholders, including the latest trends, developments, and innovative approaches in combatting modern slavery. It strengthened the collective momentum to eradicate modern slavery, and this momentum is now being fed back into Icon Water.

## Supply chain due diligence

Modern slavery supply chain due diligence is a critical process through which we identify, prevent and mitigate risks of modern slavery. It involves the systematic and ongoing assessment of suppliers and subcontractors to ensure that they adhere to anti-modern slavery policies.

This year, through the WSAA Modern Slavery COP, we evaluated and selected an online modern slavery supplier platform. The software enhances supply chain transparency by tracking, monitoring and managing supply chains, and gives us the ability to identify (and then address) modern slavery risks. A vendor has been selected and the consortium of utilities are now working together to implement the solution.

We have also been working internally to ensure that modern slavery and sustainability are considered and included in procurements (for all risk profiles). This included the development of quick reference guides for sustainable procurement.

Sustainability is implicitly linked to modern slavery in a number of ways. There is evidence of a correlation between natural hazard and climate change-impacted countries and increases in modern slavery. There is also a link between improved social, human rights and ethical work practices reducing cases in modern slavery. Therefore work that contributes to a more responsible and sustainable supply chain can actively help to mitigate modern slavery risks.



## ASSESSMENT AND EFFECTIVENESS

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It is important to reflect on the work that has been done and regularly review our progress. Assessing the effectiveness of our actions enables us to learn, improve and demonstrate our commitment to eradicating modern slavery in our operations and supply chains.

We will continue to assess the effectiveness of our actions in identifying and managing modern slavery risks by:

- maintaining a modern slavery working group with representatives from across the business
- conducting an annual review of our approach and response to modern slavery risks
- tracking the actions taken to address modern slavery risks and measuring their impact
- providing regular reports to the Icon Water Board through the Risk and Assurance Committee.

# 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 2023–24, we will continue to monitor the potential risks of modern slavery in our operations and supply chain and look for ways to improve our monitoring and responses.

We have identified the following key priorities for the year ahead from phase 2 of our approach:

- Develop corrective action and risk mitigation plans for high value/high risk suppliers as required. This includes reviewing our risk profile by analysing where the greatest likelihood of slavery is within our operations and supply chain.
- Provide refresher modern slavery training to empower all staff to identify modern slavery and take action to address the risks.
- Continue to collaborate with the water industry on modern slavery risks to drive efficiencies across the sector and deliver a consistent and coordinated approach to managing modern slavery risks.
- Collaborate with the WSAA Modern Slavery COP to implement the online modern slavery supplier platform.
- Engage with suppliers to communicate Icon Water's expectations and address modern slavery risks.
- Remain vigilant to any occurrences of modern slavery by taking action to investigate any reported, actual or suspected incidents of modern slavery within our operations or supply chains.

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