

2024 – 25

# 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 welcomed the changes in legislation to establish the inaugural Australian Anti-Slavery Commissioner. Knowing that modern slavery affects every country in the world – even Australia – we support the important role the Australian Anti-Slavery Commissioner will play in helping businesses to further strengthen their efforts to address modern slavery.

We also advanced important changes in our business. They included the staged transition of a range of corporate services and systems back to Icon Water, the establishment of key long-term contracts to support the delivery of our program of capital works to grow and improve our water and wastewater networks to meet future demand, and the development of our new 10-year business strategy. Greater strategic control will allow us to develop more direct relationships with more suppliers within our supply chain, with long-term contracts creating opportunities for sustained and collaborative supplier engagement about our collective responsibilities to work towards the eradication of modern slavery.

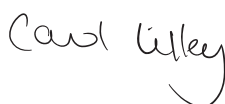
We remain committed to continuous improvement and identifying impactful actions, aligned with our long-term strategies to strengthen our own efforts to address modern slavery. In this reporting period, we focused on actions to embed and elevate the progress we have made so far. In the next reporting period, we intend to review our approach to confirm it continues to support us to address modern slavery as changes in our business come into effect and we launch our long-term business strategy.

To date, we have not identified any instances of modern slavery in our business – but we understand that modern slavery can be hidden in plain sight and that responding to modern slavery is a shared, ongoing responsibility. We continue to explore ways to focus shared efforts with our partners, suppliers and industry to address modern slavery.

On behalf of the Icon Water Board and Executive we are pleased to present Icon Water's Modern Slavery Statement for 2024-25 approved on 18 November 2025.



**Carol Lilley**



**Chair  
Icon Water**



**Ray 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 recognises any other people or families with connections 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.

# MANDATORY REPORTING CRITERIA

This statement is prepared for Icon Water Limited.

Relevant information that covers the mandatory reporting criteria outlined in the *Modern Slavery Act 2018 (Cth)* can be referenced in this statement in the sections highlighted below:

Mandatory Reporting Criteria	Page
Entity identity	6, 8
Structure, operations and supply chains	8-9 and 11-12
Risks of modern slavery practices in operations and supply chains	11-12
Actions taken to assess and address modern slavery risks, including due diligence and remediation processes	12-14
Assessing effectiveness of actions taken	15
Consultation with entities we own or control	10

## ABOUT US

We are the ACT's supplier of essential water and wastewater services and have proudly served our community for over 100 years – sourcing, treating and supplying water, and managing Canberra's wastewater network. Our work is essential to the health, prosperity and liveability of the region, and we are committed to environmental, social and financial sustainability in everything we do.

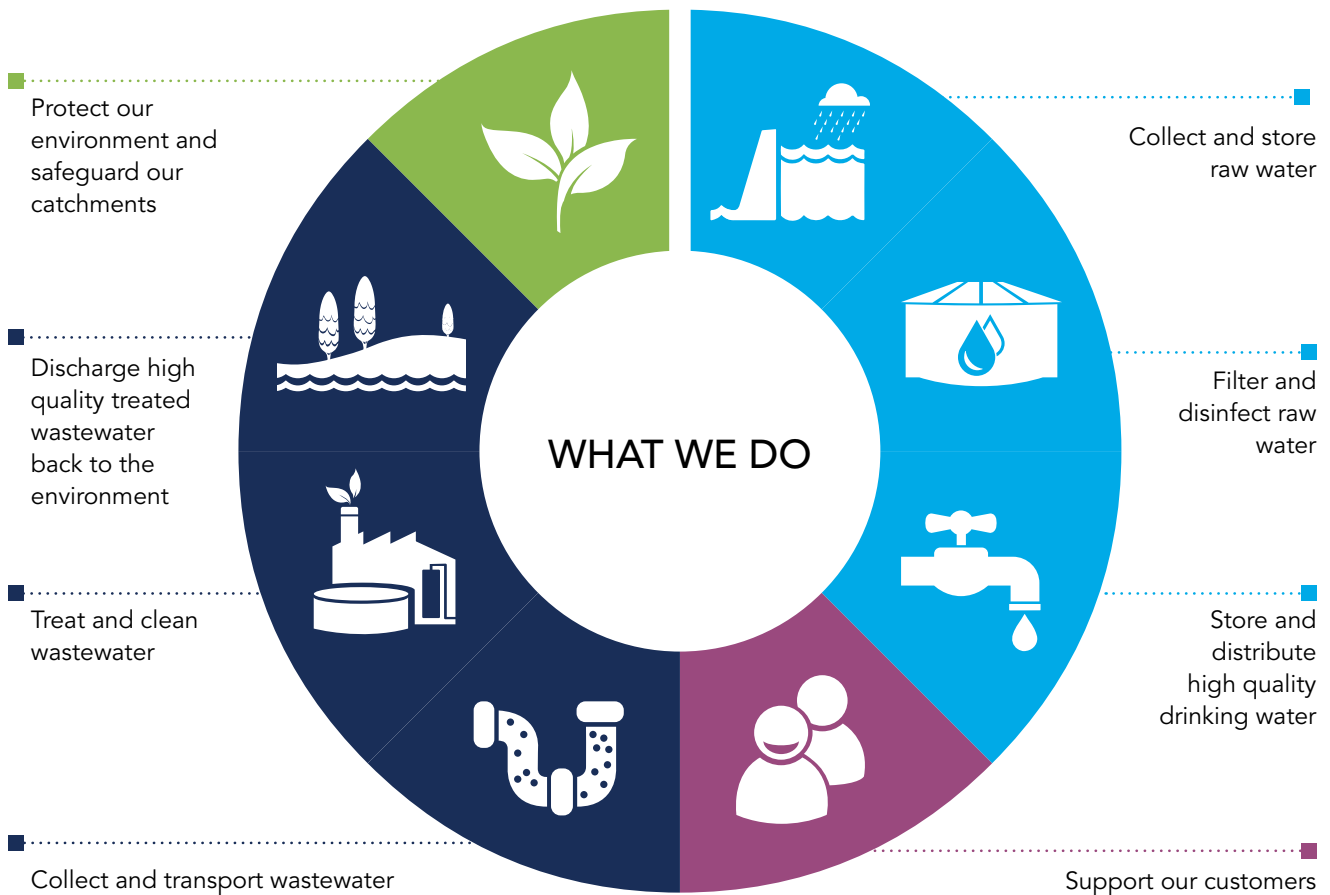


Figure 1 What we do at Icon Water

## OUR ASSETS

# \$3.6 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



**28**

Wastewater pumping stations



**4**

Wastewater 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 Minister for Finance and the Minister for Climate Change, Environment, Energy and Water.

We must comply with the objectives set out in the *Territory-owned Corporations Act 1990 (ACT)*:

- 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 performance targets in our Statement of Corporate Intent
- to show a sense of social responsibility by considering and supporting the interests of the community in which we operate
- where our activities affect the environment, to effectively integrate environmental and economic considerations into decision-making.

These objectives are central to how we operate and plan for the long-term wellbeing of our community and environment.

Icon Water’s organisational structure has six groups, each led by an executive.



Figure 3 Our organisational structure, 2024 – 25



We employed 502 employees (498 FTE) in this reporting period. Our employment conditions are governed by Australian workplace laws, including the Icon Water and Combined Unions Enterprise Agreement. We review our organisational profile and staffing requirements as part of our regular budget planning process to ensure our operations remain prudent and efficient.

## OUR OPERATIONS

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We operate one of Australia's largest inland sewage treatment plants and safely return around 70 per cent of Canberra's used water to the environment. We also provide bulk water to Queanbeyan and Googong, and manage a significant network of dams, treatment plants, reservoirs, pumping stations, pipes and other critical infrastructure, with a total asset value of around \$3.6 billion.

More detail about our network and assets can be found in our [2024-25 Annual Report](#) published on the Icon Water website.

## CONSULTATION WITH CONTROLLED ENTITIES

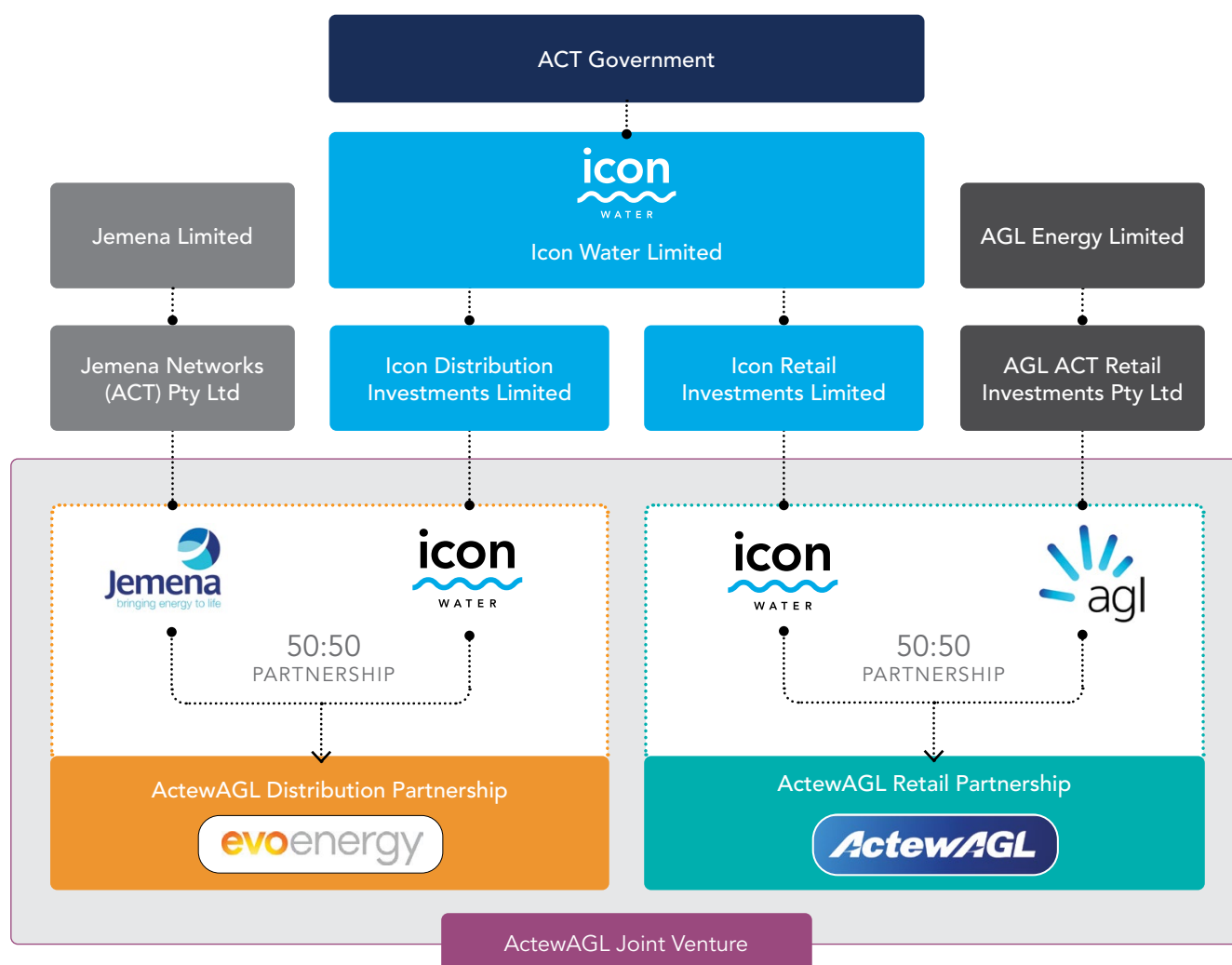
We hold a 50 per cent investment in the ActewAGL joint venture, which supplies energy to the ACT and region. The ActewAGL joint venture comprises two partnerships, ActewAGL Distribution (operating the electricity distribution network and most of the transmission network in the ACT) and ActewAGL Retail (selling energy products and services).

More information about our management of the ActewAGL Joint Venture can be found in our [2024–25 Annual Report](#).

As part of our commitment to addressing modern slavery risks within our business operations, we prioritise effective communication with ActewAGL about our efforts to do this. We have established bi-annual meetings with ActewAGL to allow for focused discussion on this topic.

In 2024–25 a key part of our consultation was sharing valuable insights and information gained from our continued collaborations with industry peers. We continue to share our experience with the Water Services Association of Australia (WSAA) Modern Slavery Community of Practice and Procurement Network with ActewAGL as these forums share information from across industry to assist in identifying, assessing, and mitigating modern slavery risks within supply chains.

We heard from ActewAGL about the challenges and successes they are experiencing, including how they are addressing instances of supplier fatigue the cumulative burden of being asked for the same or similar information across jurisdictions and organisations. These discussions continue to increase our collective capabilities and our organisational maturity in improving our approach to modern slavery risks. ActewAGL documents its modern slavery practices through its own modern slavery statement.



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 ActewAGL joint venture

# 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.

We assess the risk of modern slavery in our operations and supply chains by using key factors such as geographic location, industry sector, and the type of products (goods, services, works) being procured. These factors are integrated as part of our risk assessment processes which are informed by a range of external sources, such as the Global Slavery Index. This ensures a robust evaluation of areas of potential vulnerability is made.

ESG is one of five key principles which underpin our procurement framework (Framework). We conduct procurements in a way that will meet the objectives of these principles. ESG was included as a principle to encourage identification of opportunities to integrate these priorities in procurement processes, working with our suppliers to understand, manage and improve impact across the procurement lifecycle.

For modern slavery, our Framework includes a range of tools to support our business to highlight the importance of this as part of procurement processes, including

to request information from our potential suppliers to enhance our understanding of their modern slavery practices and their assessment of modern slavery risks within their own supply chains.

In 2024–25, Icon Water procured a wide variety of goods, works and services from approximately 879 suppliers, 98% of which are based in Australia.

This year, our main categories of procurement remained static (as compared to 2023–24) and included:

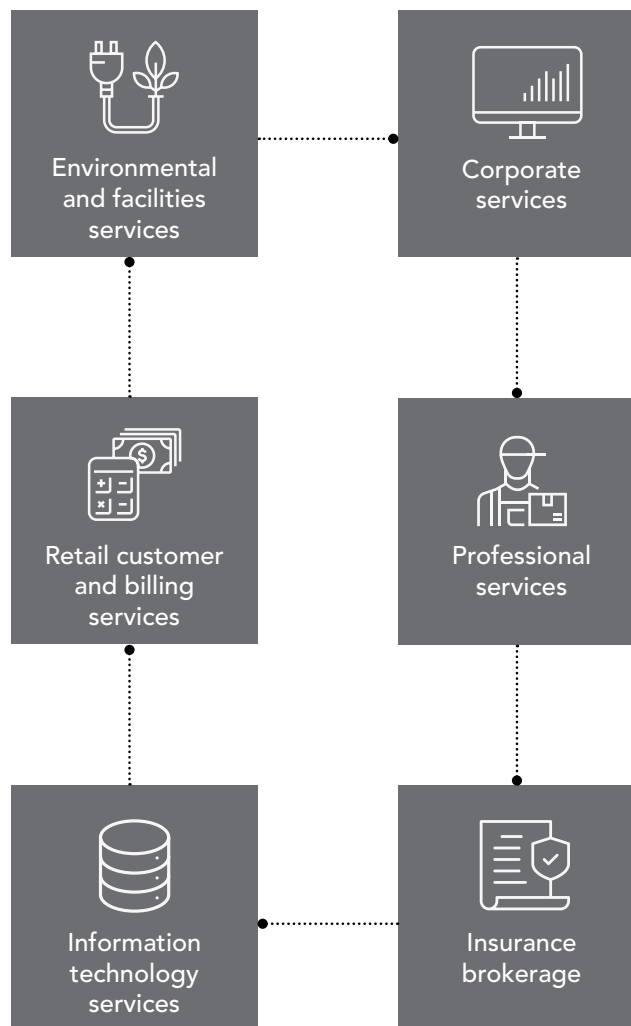


Figure 5 Our main categories of procurement

Our supply chain is diverse, but we continue to identify two main categories with an elevated risk of Icon Water causing, contributing to, or being directly linked to modern slavery:

- **Apparel:** This includes gloves, vests, overalls, personal protective equipment, 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 within our supply chains.
- **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. This reporting period, we conducted a review of our controls (current and planned), including to assess their effectiveness.

Under Icon Water's new business strategy, there has been an increase in construction related procurements. Icon Water has engaged with the suppliers of these projects to ensure their policies and practices do not contribute to or link to modern slavery.

We continued to operate our Red Flag Hotline. This independent service is available 24 hours a day, 7 days a week to suppliers, the public and our workers to report instances of modern slavery. We did not receive any reports of modern slavery via this hotline in this reporting period.

## KEY ACTIONS TO ADDRESS MODERN SLAVERY RISKS IN 2024–25

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Our continuing work to address modern slavery risks in our operations and supply chains are organised into three categories:

- **Category 1:** Policies and publications
- **Category 2:** Training and capacity building
- **Category 3:** Supply chain due diligence.

We continued to monitor, review and implement our Modern Slavery Action Plan. We have substantively progressed planned actions to deliver identified activities across the three categories in Category 1 (policies and publications) and Category 2 (training and capability).

## OUR APPROACH

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In 2024–25, our planned activities focused on embedding prior progress and some targeted activities for supply chain due diligence.

- ✓ Ongoing awareness activities, including news items on modern slavery via Icon Water’s intranet as part of the Procurement Portal
- ✓ Sharing the experiences of a lived survivor of modern slavery with our business
- ✓ Update of modern slavery training modules
- ✓ Completion of updated modern slavery training modules by staff (mandatory training)
- ✓ Update of the 2023-24 desktop review for 2024–25 – identifying modern slavery risk
- ✓ Implementation of supplier questionnaire for procurement processes, including use for some key procurements (personal protective equipment and clothing and unit metering)
- ✓ Supplier questionnaire sent to ‘Top 10’ suppliers for completion
- ✓ Continued participation in the WSAA Modern Slavery Community of Practice and Procurement Network
- ✓ Refresh, monitor and implement the modern slavery action plan.

### Policies and publications

Our governance framework includes comprehensive guidance to support our modern slavery response. We regularly review and update our processes and documentation to ensure they remain effective and relevant.

We clearly define the standards we expect from our employees and suppliers in addressing modern slavery risks.

We improved our processes for regular awareness activities within our business, using our staff daily newsletter to publish information about current developments. This reporting period, we published articles related to modern slavery practices within local businesses, highlighting that modern slavery can occur anywhere, even in the ACT.

## Training and capacity building

Through training and capacity building, Icon Water is raising awareness of modern slavery, educating stakeholders, and strengthening our internal capabilities to identify and respond to modern slavery risks.

This year, we engaged with Moe Turaga (who has lived experience with modern slavery) and Fiona Davis (creator of the Modern Slavery Index) during our Skills Month in October 2024. Their in-person presentation was broadcast across our business, focusing on raising awareness of how modern slavery can occur in Australia and signs to look for. The presentation encouraged us to think about how we can look deeper into our supply chain to identify modern slavery risks.

We also actioned findings from the review of our modern slavery training modules and implemented a new mandatory training module that will enhance our employee's knowledge and awareness.

## 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.

We introduced changes to our contract management guidance and plans, to include information about how to consider modern slavery practices and identify modern slavery risks when reviewing supplier performance.

Last year, we undertook a desktop review of our suppliers. We repeated this activity in 2024-25. The findings from this review continue to inform our ongoing due diligence efforts and help prioritise engagement with suppliers who require further scrutiny and support to address modern slavery risks effectively.

We have established new processes to support the issue of a supplier questionnaire during select procurements. Generally, this is for more complex procurements, with a medium to high-risk category of goods, services or works. The questionnaire is being used during our value for money assessments to assist in determining preferred suppliers, by ensuring that a supplier's modern slavery practices and risks are considered.

In this reporting period (and noting the establishment of key long-term arrangements to support our delivery of our capital works program), we worked with our delivery partners to understand how they identify and address modern slavery risks in their business. This included a desktop assessment of information provided to us about their own governance for these risks. We understand that modern slavery has impacted within some of our delivery partners' supply chains. We welcome the opportunity to learn from their experiences, including as we further develop our supplier engagement.

Our new supplier questionnaire was also sent to our top 10 suppliers by value. We continue to work with our suppliers in their response to this questionnaire.



## ASSESSING OUR EFFECTIVENESS

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

This year, we assessed our effectiveness by:

- carrying out a maturity assessment (including for modern slavery) which evaluated our current and target maturity across four elements – governance, strategy, risk management and metrics and targets
- undertaking a review of controls (current and planned) recorded in our relevant risk registers, assessing effectiveness and ensuring any planned controls are captured as part of our Modern Slavery Action Plan
- conducting an annual review of our approach and response to modern slavery risks, ensuring our actions remain relevant (as updated in our Modern Slavery Action Plan)
- tracking the actions taken to address modern slavery risks, including reflecting on what works and where improvements are needed.



# Looking ahead

Addressing modern slavery effectively in our operations and supply chains is an ongoing process that requires commitment, collaboration, and continuous improvement.

Our approach will continue to evolve as we refine our processes and build capacity and capability within our business.

In 2025-26, we will remain vigilant in our monitoring within our operations and supply chain. We will review where our approach may need to change to reflect changes in our business and the increasing complexity of ESG reporting. Opportunities to enhance our monitoring and response mechanism is expected to be a focus.

The following activities are identified for the year ahead:

- **Increase awareness:** by publishing key modern slavery articles on the intranet and ongoing use in more procurements of the supplier questionnaire.
- **Increase supplier engagement:** through planning for and development of a supplier engagement plan, a supplier code of conduct and grievance and remediation guides.
- **Collaborate with the water industry:** continuing to work closely with the water industry to address modern slavery risks, to drive greater efficiency, effectiveness and impact across the sector.
- **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 appropriately addressed.

## Principal Registered Office

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## TTY for Hearing Impaired

133 677

## Language assistance

13 14 50  
24 hours

To obtain language assistance, call the number above.

“如需语言协助, 请拨打上面的电话号码”。

「如需語言支援, 請撥打上述電話號碼。」

«भाषाई सहायता प्राप्त करने के लिए, ऊपर दिए गए नंबर पर कॉल करें।»

«भाषा सम्बन्धी सहयोग लिन, माथिको नम्बरमा फोन गर्नुहोस्।»

«ਆਪਣੀ ਭਾਸ਼ਾ ਵਿੱਚ ਸਹਾਇਤਾ ਪ੍ਰਾਪਤ ਕਰਨ ਲਈ, ਉੱਪਰ ਦਿੱਤੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ।»

“Để được hỗ trợ về ngôn ngữ, hãy gọi đến số điện thoại ở trên”.

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