

Modern Slavery Statement

2020



CK William Group

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About us

The CK William Group invests in electricity and gas transmission and distribution as well as renewable and remote energy. It holds the following interests in the businesses below:

100% of Energy Developments (EDL) (a supplier of global green fuel and off-grid energy that operates in Australia, the UK, USA, Canada and Greece).



66% of United Energy (UED) (an electricity distribution business in Victoria serving approximately 688,000 customers across east and south-east Melbourne and the Mornington Peninsula).



The Dampier-Bunbury Pipeline (DBP) and Multinet Gas Networks (Multinet) businesses, which are part of the broader Australian Gas Infrastructure Group (AGIG) (one of the largest natural gas distribution and transmission businesses in the country).



These businesses operate separately from one another and under their own distinct brands, as set out above. Each of these businesses has submitted a modern slavery statement on behalf of the reporting entities within their respective corporate groups.

Chairman's statement

We recognise that the whole CK William Group has an important role to play in identifying and managing the risk of modern slavery throughout the entirety of our business, workforce, and extended supply chains.

Modern slavery, which includes servitude, slavery, forced labour, forced marriage, child labour, debt bondage, deceptive recruiting for labour or services and human trafficking, is an abhorrent practice and will not be tolerated in any of the activities carried out by the CK William Group.

Accordingly, we support the use of socially responsible, ethical, transparent and legislatively compliant practices in carrying out our activities, and recognise that ongoing vigilance and effort will be required to eliminate the risks of modern slavery in our operations and supply chains.

We will continue to track and report on our progress in this regard, and will submit a Modern Slavery Statement on an annual basis. Each of the EDL, UED and AGIG business units will also continue to submit a Modern Slavery Statement (approved by the relevant Board) for the operations and supply chains of that business unit. These statements should be read together to obtain a clear picture of the operations of the entire CK William Group.



Introduction to this modern slavery statement

Our inaugural Modern Slavery Statement is a joint statement made under the Modern Slavery Act 2018 (Cth) (the Act), and is submitted by CK William Australia Holdings Pty Ltd for the following investment vehicles (the reporting entities) (as that term is defined in the Act) for the period from 1 January 2020 to 31 December 2020 (the reporting period):

Table 1:

Name	Abbreviation	Summary
CK William Australia Holdings Pty Ltd ABN 14 613 690 243	CKW Australia	CKW Australia is the parent of the Australian CK William Group. It is wholly owned by a UK entity and holds its interests in the other CK William Group companies through its 100% ownership of CKW Aust Bidco.
CK William Australia Bidco Pty Ltd ABN 30 613 693 182	CKW Aust Bidco	CKW Aust Bidco directly holds 100% of the DBP and Multinet parts of the AGIG business unit. Its interests in the other business units are held through the below DUET subsidiaries.
DUET Company Pty Ltd ABN 93 163 100 061	DUET Co	DUET Co is a wholly-owned subsidiary of CKW Aust Bidco, and holds 100% of DUET 1 (which holds the 100% interest in the EDL business unit and the 66% interest in the UED business unit).
Diversified Utility and Energy Trust 1 ABN 83 495 791 796	DUET 1	
DUET Finance Trust	DUET Finance	DUET Finance is also wholly-owned by CKW Aust Bidco.

In this Modern Slavery Statement:

- references to the reporting entities refer to the reporting entities set out in table 1 on a collective basis;
- references to the business units refer to the reporting entities' controlled entities and subsidiaries that operate the businesses known as EDL, UED, DBP and Multinet; and
- references to the CK William Group refer to the reporting entities and the business units on a collective basis.

This Modern Slavery Statement sets out the steps taken during the reporting period by the CK William Group to:

- assess the potential risks of modern slavery arising from the reporting entities' investment activities as well as within our business units and in the supply chains supporting those investment activities and business units; and
- outline the current and proposed processes and procedures that we have adopted, or will be adopting, to manage such risks.

As the reporting entities' activities involve investment in the business units (which operate as separate and diverse businesses), this Modern Slavery Statement should be read in conjunction with the Modern Slavery Statements submitted by each of the business units to obtain a comprehensive picture of the CK William Group's compliance with the Act.

The business units respective Modern Slavery Statements are submitted on behalf of the following 'reporting entities' and are available on each of the business units' respective websites:

Table 2:

EDL Modern Slavery Statement	
DUET EDL Pty Limited	ABN 91 607 005 685
Energy Developments Pty Limited	ABN 84 053 410 263
EDL Holdings (Australia) Pty Limited	ABN 67 058 224 481

UED Modern Slavery Statement

United Energy Distribution Holdings Pty Ltd	ABN 15 104 381 660
Power Partnership Pty Ltd	ABN 48 070 061 282
United Energy Distribution Pty Ltd	ABN 70 064 651 029

AGIG Modern Slavery Statement

Australian Gas Infrastructure Holdings Pty Ltd	ABN 22 120 456 573
DBNGP (WA) Transmission Pty Ltd	ABN 69 081 609 190
Multinet Gas Distribution Partnership	ABN 53 634 214 009
DUET Dampier Bunbury Pty Ltd	ABN 19 110 757 625

The reporting entities fully endorse the actions being taken by the business units to manage modern slavery risks.

The business units' respective websites are:

<https://www.unitedenergy.com.au/>

<https://edlenergy.com/>

<https://www.agig.com.au/>

Our structure

As noted above, the CK William Group comprises:

- a suite of corporations that make up the abovementioned business units (EDL, UED, DBP and Multinet); and
- investment vehicles that hold controlling interests in the business units (the reporting entities).

Each of the business units comprises a distinct and separate corporate group, managed by separate, individual and independent executive teams and separate boards of directors using separate governance frameworks.

The reporting entities are owned by the CK William Consortium, which comprises CK Infrastructure Holdings Limited (CKIH), CK Asset Holdings Limited (CKAH), and Power Asset Holdings Limited (PAH). For completeness, CKIH has a modern slavery and human trafficking statement, which is available at:

https://www.cki.com.hk/english/PDF_file/sustainability/sustainability_policy/modern_slavery_and_human_trafficking_statement.pdf.

Our operations

The primary operations of the reporting entities involve their investments, as holding companies, in the various business units. Accordingly, the business operations of these investment vehicles are essentially limited to office administration, financial and corporate advisory matters ancillary to the relevant investment activities.

The reporting entities do not themselves have any employees, and business administration is carried out by personnel who are employed within one of the business units.

The reporting entities have registered offices in Melbourne, Australia.

The main operations carried out by each of the business units in which the reporting entities hold an interest are described below:

- **EDL:** delivers reliable and cost-effective innovative and remote energy solutions through a portfolio of more than 1 GW of energy generation capacity from 97 power stations across Australia, North America and Europe. EDL also provides energy through the supply of liquefied natural gas (LNG) and compressed natural gas (CNG) and is expanding its renewable natural gas (RNG) capabilities. EDL has more than 500 employees across its countries of operation;
- **UED:** owns and operates the electricity distribution network which supplies electricity to end users located in south-east Melbourne and the Mornington Peninsula in Victoria;
- **DBP:** owns and operates gas transmission infrastructure in Western Australia; and
- **Multinet:** owns and operates the Multinet gas network in Victoria.

Further details about the operations of each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG.



Our supply chains

As the operations of the reporting entities are limited to business administration and financial and corporate advisory matters ancillary to their investment activities, they have relatively limited supply chains.

In contrast, the individual business units within the CK William Group have extensive, multi-layered supply chains to support the range of their business operations. At a high level, these principally involve the following major sectors:

- fuels, petroleum products and consumables for power stations and gas infrastructure
- core materials, plant and equipment for electricity generation and gas capture, supply and transmission activities (ranging from gas pipelines to generating units)
- fleet and transportation services (for example for the supply of CNG, LNG and RNG)
- professional and technical services (ranging from technical drafting support to legal advice)
- construction and civil works
- operation and maintenance services
- facilities management
- personal protective equipment and workwear
- information technology
- office services (including catering, cleaning, security, and office supplies)

Further details about the supply chains for each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG.

Modern slavery risk assessment

During the reporting period, the reporting entities directly engaged less than 20 first tier suppliers, all of which are established corporate services firms that are themselves 'reporting entities' under the Act.

At this introductory stage, the reporting entities have undertaken a high level analysis of major suppliers, using publicly available materials and considering the more detailed, supplier-specific due diligence carried out by individual business units, to assess the risk of modern slavery in our operations and supply chains.

More broadly, our business units have undertaken their own risk assessment practices of their respective operations and supply chains that principally involved:

- carrying out a desktop due diligence process to identify the regions and industries that have the highest risk factors;
- collaborating with relevant procurement and human resources teams to assess which risk factors are relevant to our specific operations;
- analysing our employment and contracting patterns and our highest-spend supplier bases in light of identified risk factors; and
- using both publicly available materials and more detailed, supplier-specific due diligence, to assess the risk of modern slavery in the various operations within, and supply chains supporting, the business units.

This process has illustrated that the operations of, and supply chains supporting, the CK William Group can be described as having:

- a low risk of modern slavery practices associated with direct employment relationships;
- a higher risk of these practices for contract services that involve the provision of personnel from a temporary or itinerant workforce or blue-collar workers that are in the lower-paid range, particularly where these personnel are provided by certain types of third party recruitment agencies;
- a relatively low risk for contract services carried out by professional or experienced technical personnel;

- varying jurisdictional risk associated with the provision of raw materials or plant and equipment, depending on the relevant country of origin/manufacture - particularly where these involve countries with known human rights or governance concerns or a predominantly impoverished or vulnerable populace;
- varying industry risks for different categories of services, with higher risks occurring in the more labour-intensive industries such as information technology, office services, and the manufacturing, construction, and non-building sector construction spaces;
- cultural risks that may be associated with certain suppliers, particularly where there is a misalignment of cultural or ethical values or use of sharp business practices; and
- a general risk associated with the length, breadth and complexity of our supply chains, which involve thousands of suppliers and hence render the majority of inputs opaque to initial investigations.

For our business units, these risks manifest in operations principally through the procurement of:

- consumables and fuel;
- plant and equipment, both core operational plant and equipment, personal protective equipment and information technology equipment; and
- contract services for manpower, particularly office-related services such as catering, cleaning and waste management but also in the manufacturing and construction services industries.

Further details about the specific risks identified in each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG.



Key actions taken in 2020

During the reporting period, modern slavery risk mitigation actions for the CK William Group were undertaken by each of the business units. In 2020 we focused on laying the groundwork for the ongoing development of modern slavery identification and risk management. The actions taken during this period principally comprised:

- assessing the relevant obligations in the modern slavery legislation;
- establishing working groups and rolling out tailored training to working group personnel;
- understanding relevant risk factors for modern slavery that could be present both within operations and through relevant supply chains;
- consulting with various aspects of our business operations, including between business units and with our peers;
- reviewing and modifying internal and supplier-facing policies and procedures to clarify our stance in respect of modern slavery, and to facilitate the transparency of approach and identification of such risk factors in this regard;
- changing our procurement and supply contracts to include anti-modern slavery provisions and reinforce our desire for suppliers and contractors to hold similar approaches to compliance; and
- carrying out preliminary desktop due diligence assessments of major/top-tier suppliers to identify whether any such risk factors were present.

Further details about the key actions our business units took in the reporting period are available in the modern slavery statements of each of EDL, UED and AGIG.

Assessing the effectiveness of these actions

To measure the effectiveness of actions taken to assess and address modern slavery risks, we considered the extent to which we identified any instances of modern slavery during the reporting period. In our business units, no actual instances of modern slavery were identified or reported in the 2020 calendar year.

We also considered what further steps could be taken to identify, address and mitigate modern slavery risks in our investment vehicle activities. We are committed to continuous improvement and intend to, over time, build a picture of relevant risk factors and identify where these risk factors are likely to be concentrated within the operations and supply chains of the reporting entities and business units. We will be tailoring our further actions to more specifically locate these risks, which will enable us to progressively implement more targeted management strategies.

Further details about the assessment of effectiveness that each of our business units undertook are available in the modern slavery statements of each of EDL, UED and AGIG.

Our plans for 2021 and beyond

The reporting entities support the actions that have been proposed by each of our business units in their respective Modern Slavery Statements, such as:

- preparing and rolling out modern slavery training modules to help our personnel identify modern slavery risks;
- continuously improving policies and procedures, focusing on supplier engagement;
- managing identified risks;
- seeking to contract with reputable and reliable suppliers that have similar moral and ethical approaches to us, with a view to establishing long-term relationships; and
- regularly reviewing the approaches taken to monitor the effectiveness of these approaches.

Further details about the 2021 plans of each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG

Consultation

This Modern Slavery Statement was prepared following a consultation process with legal and procurement personnel of each of our business units responsible for modern slavery compliance and those personnel who carry out functions for the CK William Group investment vehicles.

Approval

Each of the business units' respective Modern Slavery Statements were approved by their respective boards. This Modern Slavery Statement is approved by the Board of CK William Australia Holdings Pty Ltd, the ultimate holding company for the CK William Group entities and their Australian business units.



Signed by Ben Wilson in his capacity as
Director of CK William Australia Holdings Pty Ltd



A quick guide to this modern slavery statement

Requirement of the Act	Statement Reference
Identify the reporting entity (section 16(1)(a))	"Introduction to this Modern Slavery Statement" (pp. 3-5)
Describe the reporting entity's structure, operations and supply chains (section 16(1)(b))	"Our structure" (p.5), "Our operations" (p.6), "Our supply chains" (p.7)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity that it owns or controls (section 16(1)(c))	"Modern slavery risk assessment" (p.8-9)
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes (section 16(1)(d))	"Key actions taken in 2020" (p.10)
Describe how the reporting entity assesses the effectiveness of these actions (section 16(1)(e))	"Assessing the effectiveness of these actions" (p.11)
Describe the process of consultation with any entities the reporting entity owns or controls and the entity giving the statement (section 16(1)(f))	"Consultation" (p.12)
Other relevant information (including COVID-19) (section 16(1)(g))	"Our plans for 2021 and beyond" (p.11)
Details of approval by the relevant principal governing bodies (section 16(2)(b))	"Approval" (p.12)