



# Modern Slavery Statement 2022

CK WILLIAM GROUP

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## About Us

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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 energy 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.

# Chair's Statement

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The CK William Group continues to recognise the role that businesses play in addressing modern slavery risks.

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

The CK William Group supports the use of socially responsible, ethical, transparent and legislatively compliant business practices. Continuous improvement and sustained efforts are required to eliminate the risks of modern slavery in our businesses, operations and supply chains.

The CK William Group is made up of distinct business units, each of which submit a Modern Slavery Statement (approved by the relevant Board). The statements submitted by each business unit, and this Modern Slavery Statement, should be read together to obtain a comprehensive picture of the operations of the entire CK William Group and the steps taken to identify, mitigate and remediate risks of modern slavery across our businesses.

**Andrew Hunter**  
Chair





# Introduction to this Modern Slavery Statement

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This 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 set out in table 1) (as that term is defined in the Act) for the period from 1 January 2022 to 31 December 2022 (the reporting period):

Table 1 - Reporting Entities

Name	Abbreviation	Summary
<b>CK William Australia Holdings Pty Ltd</b> 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.
<b>CK William Australia Bidco Pty Ltd</b> 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.
<b>DUET Company Pty Ltd</b> 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).
<b>Diversified Utility and Energy Trust 1</b> ABN 83 495 791 796	DUET 1	



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.

EDL Modern Slavery Statement	
<b>DUET EDL Pty Limited</b>	ABN 91 607 005 685
<b>Energy Developments Pty Limited</b>	ABN 84 053 410 263
<b>EDL Holdings (Australia) Pty Limited</b>	ABN 67 058 224 481
UED Modern Slavery Statement	
<b>United Energy Distribution Holdings Pty Ltd</b>	ABN 15 104 381 660
<b>Power Partnership Pty Ltd</b>	ABN 48 070 061 282
<b>United Energy Distribution Pty Ltd</b>	ABN 70 064 651 029
<b>United Energy Services Pty Ltd</b>	ABN 55 630 720 213

AGIG Modern Slavery Statement	
<b>Australian Gas Infrastructure Holdings Pty Ltd</b>	ABN 22 120 456 573
<b>DBNGP (WA) Transmission Pty Ltd</b>	ABN 69 081 609 190
<b>Multinet Gas Distribution Partnership</b>	ABN 53 634 214 009

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

The business units' respective websites are available at:

[United Energy](#)

[EDL Energy](#)

[Australian Gas Infrastructure Group](#)



## Our Structure

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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 [here](#).

## Our Operations

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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 95 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.
- **Multinet:** owns and operates the Multinet gas network in Victoria.

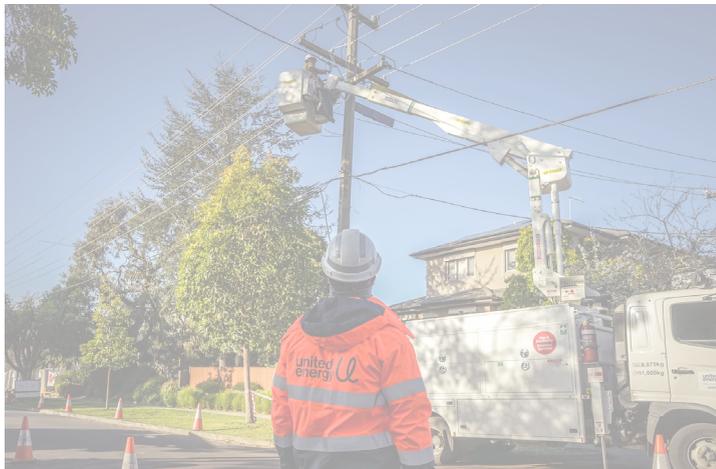
Further details about the operations of each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG.



# Our Supply Chains

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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 limited supply chains. Predominantly, the tier 1 suppliers are consultant advisors at major professional services firms in Australia.



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

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During the reporting period, the reporting entities directly engaged less than 10 first tier suppliers, all of which are established corporate and professional services firms that are themselves 'reporting entities' under the Act and have well established modern slavery compliance programs in place. These suppliers provide legal, tax, insurance and corporate accounting services.

The reporting entities have undertaken a high level analysis of major suppliers, using publicly available materials (including reviews of modern slavery statements submitted to the regulator by suppliers). The reporting entities have also considered the detailed, supplier-specific due diligence carried out by individual business units, to assess the risk of modern slavery in our operations and supply chains.



**Each business unit has undertaken its own risk assessment practice, applicable to its respective operations and supply chains. In summary, each business unit's practice involves:**

- carrying out a desktop due diligence process to identify the suppliers, regions and industries that have the highest risk factors;
- collaborating with relevant procurement, legal 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;
- using both publicly available materials, ad hoc modern slavery consultant expertise and more detailed, supplier-specific due diligence, to assess the risk of modern slavery in the various operations and supply chains.



**This process has illustrated that the operations of, and supply chains supporting, the CK William Group (through the business units) 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, manufacturing, construction, and non-building sector construction industries;
- regional risks that may be associated with certain regions known to have an inherent risk of modern slavery due to accepted labour practices or state-mandated labour transfer schemes; 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 2022

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**During the reporting period, modern slavery risk mitigation actions for the CK William Group were undertaken by each of the business units. In 2022 we focused on meeting commitments made in our 2021 modern slavery statements and striving for continuous improvement in the practices of modern slavery identification and risk management. The actions taken during this period principally comprised:**

- rolling out tailored training to working group personnel;
- consulting with various suppliers to understand their modern slavery risk mitigation practices and varying our contracts with them as required;
- carrying out due diligence assessments of major/top-tier suppliers to identify whether

any modern slavery risk factors were present and taking mitigative actions were required;

- reviewing our procurement practices to embed modern slavery risk assessment.
- 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 2022 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, tailor our activities to more specifically apply efforts to areas of highest identified risks, which will enable us to progressively implement more effective risk mitigation and remediation (if necessary) strategies.

Further details are available in the modern slavery statements of each of EDL, UED and AGIG.



# Our Plans for 2023 and Beyond

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**The reporting entities support the actions proposed by each of the individual business units in their respective Modern Slavery Statements, such as:**

- continuing to deliver modern slavery training modules to help our personnel identify modern slavery risks;
- continuously improving policies and procedures, focusing on supplier engagement;
- managing identified risks and maintaining independent reporting hotlines;
- contracting with reputable and reliable suppliers that have similar sustainable procurement and ethical labour practices; and
- regularly reviewing the approaches taken to monitor effectiveness.

Further details about the 2023 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 collaboratively by legal, finance and procurement personnel of each of our business units responsible for aspects of modern slavery compliance and those personnel who carry out relevant 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.

A handwritten signature in blue ink, appearing to read 'Craig de Laine', written over a dashed blue line.

**Signed by Craig de Laine 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
<b>Identify the reporting entity</b> (section 16(1)(a))	"Introduction to this Modern Slavery Statement" (p. 3-4)
<b>Describe the reporting entity's structure, operations and supply chains</b> (section 16(1)(b))	"Our structure" (p.5), "Our operations" (p.5), "Our supply chains" (p.6)
<b>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</b> (section 16(1)(c))	"Modern slavery risk assessment" (p.7-8)
<b>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</b> (section 16(1)(d))	"Key actions taken in 2022" (p.9)
<b>Describe how the reporting entity assesses the effectiveness of these actions</b> (section 16(1)(e))	"Key actions taken in 2022" (p.9)
<b>Describe the process of consultation with any entities the reporting entity owns or controls and the entity giving the statement</b> (section 16(1)(f))	"Consultation" (p.10)
<b>Other relevant information</b> (section 16(1)(g))	"Our plans for 2023 and beyond" (p.10)
<b>Details of approval by the relevant principal governing bodies</b> (section 16(2)(b))	"Approval" (p.10)