

# Modern Slavery Statement 2024

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 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 more than 715,000 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 management teams and brands. Each of these businesses has submitted a modern slavery statement on behalf of the reporting entities within their respective corporate groups.

# Chair's Statement

The CK William Group remains committed to addressing modern slavery risks within its supply chains and business operations. We recognise the vital role businesses play in combating modern slavery, which includes servitude, forced labour, forced marriage, child labour, debt bondage, deceptive recruitment, and human trafficking.

Modern slavery is strictly prohibited across all CK William Group activities and business units. We are dedicated to fostering sustainable, ethical, socially responsible, transparent, and legally compliant business practices. Our approach is one of continuous improvement, ensuring ongoing efforts to identify and mitigate modern slavery risks within our operations and supply chains.

The CK William Group consists of distinct business units, each of which submits its own Modern Slavery Statement, approved by the respective Board. These individual statements, along with this overarching Modern Slavery Statement, collectively provide a comprehensive view of the Group's operations and the measures taken to prevent, address, and remediate modern slavery risks 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 entities set out in table 1, which are reporting entities (as that term is defined in the Act) for the period from 1 January 2024 to 31 December 2024 (the reporting period):

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. CKW Aust Bidco 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>CK William Australia Bidco Pty Ltd</b> ABN 30 613 693 182	CKW Aust Bidco	
<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	

Table 1: Reporting Entities



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 reporting entities to:

- assess the potential risks of modern slavery arising from the reporting entities' investment activities and in the supply chains supporting those investment activities; and
- outline the processes and procedures that have been adopted to mitigate such risks.

As the reporting entities' activities involve investment in the business units (which operate as separate and distinct 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 view 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' in Table 2 and are available on each of the business units' respective websites.

The reporting entities fully endorse the actions being taken by the business units to manage modern slavery risks in accordance with these Modern Slavery Statements.

The business units' respective websites are available at:

- [United Energy](#)
- [EDL Energy](#)
- [Australian Gas Infrastructure Group](#)

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

Table 2: Business Unit Reporting Entities



## Our Structure

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As noted above, the CK William Group comprises:

- investment vehicles that hold controlling interests in the business units (the reporting entities); and
- distinct companies that comprise the abovementioned business units (EDL, UED, DBP and Multinet).

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), each of which has a modern slavery and human trafficking statement, available on respective websites.

## Our Operations

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The primary operations of the reporting entities involve managing 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 have any employees. The business operations of the reporting entities described above are carried out by personnel who are employed by one of the business units, and a small number of corporate services firms engaged by the reporting entities (further described in the section titled “Our Supply Chains”).

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 invest are summarised below:

- **EDL:** delivers reliable and cost-effective innovative and remote energy solutions through a portfolio of more than 900 MW of energy generation capacity from 81 power and gas facilities across Australia, North America and Europe. EDL also provides energy through the supply of liquefied natural gas (LNG) and renewable natural gas (RNG). EDL has more than 500 employees across its countries of operation.
- **UED:** owns and operates the electricity distribution network which supplies electricity to customers located in south-east Melbourne and the Mornington Peninsula in Victoria.
- **DBP:** owns and operates Western Australia’s principal gas transmission system the Dampier to Bunbury Natural Gas Pipeline. The Australian Gas Infrastructure Development (AGID) Group operates unregulated transmission pipelines, gas processing, storage and small quantities of native gas production in Western Australia and the Northern Territory.
- **Multinet:** owns and operates gas distribution infrastructure in Victoria.

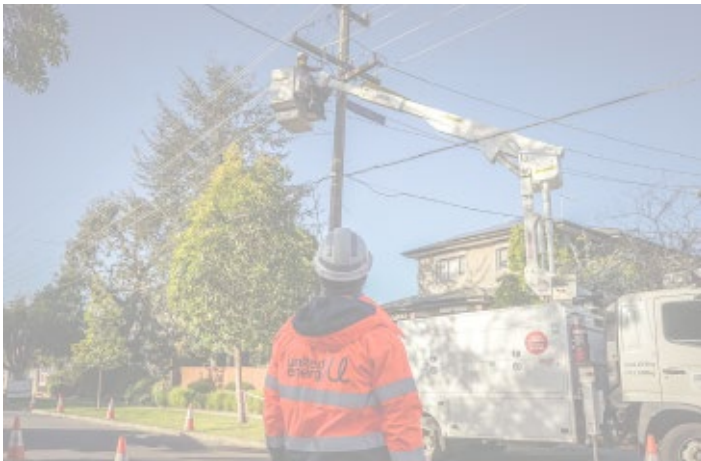
Further details about the operations of each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG.



# 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, the reporting entities have limited supply chains. Predominantly, the reporting entities tier 1 suppliers are consultants and advisors at major professional services firms.



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 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, and the majority of which 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 desktop analysis of these suppliers, using publicly available materials such as the modern slavery statements submitted by these suppliers to the regulator. The reporting entities have also considered the modern slavery 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 categories, suppliers, regions and industries that have the highest risk factors;
- engaging and using external due diligence tools to monitor modern slavery risks;
- collaborating with relevant procurement, legal and human resources teams to assess which risk factors are relevant to specific operations;
- analysing our employment and contracting patterns and our highest-spend supplier bases in light of identified risk factors;
- using 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 of the business units.





**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 supply chains, which involve thousands of suppliers and limit transparency and access to information.



**For our business units, these risks manifest in operations principally through the procurement of goods and services in higher risk industries, including:**

- consumables and fuel;
- construction work;
- 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 2024

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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 2024, the business units focused on meeting commitments made in respective 2023 Modern Slavery Statements and striving for continuous improvement in the practices of modern slavery identification, risk management, training and reporting. The actions taken during this period principally comprised:**

- Implementing external risk assessment platforms to conduct supplier due diligence relating to business ethics and modern slavery;
- continued efforts to provide modern slavery specific training to 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 audits of major/top-tier suppliers to identify whether any modern slavery risk factors were present

and taking mitigative actions where required;

- ensuring procurement practices implement modern slavery risk assessments and respond to any risk factors identified.

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 actual instances of modern slavery during the reporting period. In our business units, no actual instances of modern slavery were identified or reported in the 2024 calendar year. We also considered the extent to which our business units identified risks of modern slavery during the reporting period. In our business units, risks of modern slavery were identified, mitigated and reported on in the business unit's respective modern slavery statements.

We also considered what further steps our business units propose to take to identify, address and mitigate modern slavery risks in business operations. The CK William Group is committed to continuous improvement and similarly, each of the business units adopts a continuous improvement approach to ensuring due diligence, risk mitigation, remediation (if required) and reporting is enhanced over time.

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



# Our Plans For 2025 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 pre-qualification and onboarding;
- 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.

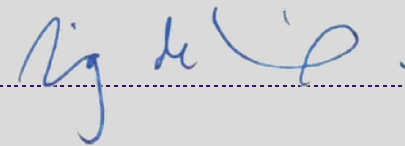
Further details about the 2025 plans of each of our business units are available in the modern slavery statements of each of EDL, UED and AGIG.

## 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.



**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

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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 2024" (p.9)
<b>Describe how the reporting entity assesses the effectiveness of these actions</b> (section 16(1)(e))	"Key Actions Taken In 2024" (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 2025 and Beyond" (p.10)
<b>Details of approval by the relevant principal governing bodies</b> (section 16(2)(b))	"Approval" (p.10)