

**JOINT STATEMENT REGARDING THE MODERN SLAVERY ACT 2018 (Cth) AUSTRALIA**  
**(FY2023)**

**1. INTRODUCTION**

**1.1 Reporting Entities**

This joint Modern Slavery Statement (“**Statement**”) is made in accordance with the Modern Slavery Act 2018 (*Cth*) (Australia) and applies to **EDMI Pty Ltd (ACN 010 061 391)** and **EDMI Gas Pty Ltd (ACN 128 174 658)**, each identified as a reporting entity. This Statement covers the reporting period from 1 January 2023 to 31 December 2023 (“**FY2023**”).

**2. BUSINESS STRUCTURE, OPERATIONS AND SUPPLY CHAIN**

**2.1 EDM I Structure and Operations**

EDMI Pty Ltd and EDM I Gas Pty Ltd (collectively “**EDMI Australia**”) are part of the EDM I group of companies (“**EDMI Group**”), with their parent company, EDM I Limited, headquartered in Singapore. EDM I Gas Pty Ltd is a wholly owned subsidiary of EDM I Pty Ltd.

EDMI Group’s business involves designing, developing and manufacturing innovative and technologically advanced energy meters and metering systems for the global utility industry. We manufacture and sell energy meters such as smart meters, and provide solution services and energy management services that utilize energy measurement and control technologies, as well as solutions utilizing IoT.

**2.2 EDM I Supply Chain**

EDMI Australia works with different business partners, from suppliers for components, sub-assemblies, metering components and finished goods relating to our gas, electricity and water meter products and solutions; distributors and vendors of our products; manufacturer of our products and others. Where possible, EDM I Australia maintains multiple supply sources so that our business is not dependent on a single or limited number of suppliers. Our business partners are

required to comply with applicable regulations and provide declarations to abide by our standards on quality, ethics, and human rights.

### **3. RISKS OF MODERN SLAVERY PRACTICES IN EDMI OPERATIONS AND SUPPLY CHAINS**

EDMI Australia acknowledges the substantial global challenge and inherent risks associated with modern slavery in supply chains. These are the risk categories considered:

#### **3.1 Forced Labour in Assembly Plants:**

There is a risk of forced labour in the assembly plants where meters are manufactured, particularly in regions with less stringent labour regulations.

#### **3.2 Exploitation in Raw Material Extraction:**

The extraction of raw materials for meter manufacturing may involve exploitative working conditions, exposing workers to hazards and inadequate wages.

#### **3.3 Child Labour in Component Manufacturing:**

Subsidiary entities involved in manufacturing components for meters may inadvertently contribute to child labour, especially in regions with lax child labour regulations.

#### **3.4 Inadequate Worker Protections in Subcontracting:**

Subcontracting practices within the manufacturing process may expose workers to inadequate labour protections and exploitation as subcontractors may not adhere to the same ethical standards.

#### **3.5 Human Trafficking in Transportation of Finished Goods:**

There is a risk of human trafficking within the transportation segment of the supply chain, particularly during the transit of finished meters, especially in regions where oversight is limited.

To fulfill our commitment to eradicating modern slavery in all its forms from our operations and supply chains, we conduct risk assessments throughout the reporting period, targeting potential areas where such practices may exist.

During FY2023, the assessment focussed on supply chain procurement activities, assessing direct suppliers, employing various criteria such as geographic risks, sourced materials, products and services, operational sectors, and supply chain models to evaluate the potential risk of modern slavery within our supply chains.

#### **4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

##### **4.1 Business Partners Code of Conduct:**

EDMI Australia ensures that its supply chain is complying to the Modern Slavery Act. We work with our business partners to ensure supply chain audits and site inspections are conducted. In FY2023 suppliers with high value of good purchased and high risk profile suppliers (“**Suppliers**”) were sent a Business Partner Code of Conduct survey.

The survey requires the Supplier to answer various questions which included but not limited to the Supplier’s awareness and commitment on issues pertaining to Environmental, Health and Safety Responsibility, Modern Slavery, Anti-discrimination, Child Labour and Human Rights Bribery & Kickbacks.

##### **4.2 New Employee Training Programs:**

As an integral part of the onboarding process at EDM I Australia, newly hired employees undergo comprehensive training programs specifically tailored to address modern slavery risks. These sessions are designed to impart a thorough understanding of EDM I Australia’s commitment to ethical practices and the imperative need to eradicate modern slavery from its operations. Covering key topics such as the professional conduct and business ethics, anti-bribery and corruption and modern slavery, identification of potential risks, and the importance of responsible decision-making, these training programs empower new employees with the knowledge and tools necessary to contribute actively to the company's ethical manufacturing practices.

By instilling these principles early in their tenure, EDM Australia ensures that all team members are aligned with the organization's values and play a crucial role in maintaining a supply chain that is free from modern slavery.

#### **4.3 Supplier Audits and Site Inspections:**

EDM Australia intends to build capability in auditing Modern Slavery compliance, as a key part of EDM Australia's Sustainability initiatives. During FY2023, assessment was made to engage a specialist provider of audit services to complete the following objectives:

##### **4.3.1 Develop audit framework covering**

- (i) To assess the compliance of EDM Australia's suppliers.
- (ii) To evaluate the effectiveness of EDM Australia's suppliers' proposed methodologies, standards, and procedures that have been approved by the carried out by selected suppliers.
- (iii) To determine the extent to which EDM Australia's suppliers have adhered to the EDM Supplier Sustainability Policy.
- (iv) To assess the adequacy and effectiveness of the tools used to track all deliverables, issues/problems, change requests, migration requests, and decisions made in the project.
- (v) To assess the adherence of the project personnel to the duties and responsibilities pertaining to EDM Supplier Sustainability Policy.
- (vi) To evaluate the fault reporting control processes, corrective and preventive processes, and the design of forms or certificates for the acceptance of the system, as stated in the plan.

##### **4.3.2 Conduct audit of key Suppliers based on EDM Supplier Sustainability Policy**

- (i) To conduct audit of key suppliers in FY2024. This proposal has been approved for implementation in FY2024.

## **4.4 EDMI Australia Polices:**

### **4.4.1 Code of Conduct and Business Ethics**

EDMI Australia Code of Conduct and Business Ethics aims to promote the standard of personal and professional integrity, honesty and values to all employees in understanding their responsibilities in their business conduct.

Among other things, the Code states that:

- (i) Harassment and discrimination in any form based on a person's gender, race, age, nationality, ethnic origin, religion, disability, sexuality is not acceptable;
- (ii) Employees should not harass or discriminate against other employees due to their office, rank or position in the company; and
- (iii) Managers must ensure equal opportunity and practice fairness in their department.

The above is also detailed in EDM I Australia People and Culture Manual where the policy is crafted with the purpose of proactively preventing discrimination, harassment, bullying, and victimization, thereby empowering our workers to perform their duties within a safe and supportive atmosphere.

### **4.4.2 Whistle Blowing Policy**

EDMI Australia is committed to the highest possible standards of ethical, moral and legal business conduct. In line with this commitment, the Whistle Blowing policy aims to provide an avenue for employees and third parties to report misconduct, including related to human rights and modern slavery risks and sensitive issues.

Whistle blowers can report any misconduct by either:

- (i) emailing directly to [whistleblowing@osakiunited.com](mailto:whistleblowing@osakiunited.com); or
- (ii) write to:

**Osaki United International Pte Ltd**

47 Yishun Industrial Park A Level 4

Singapore 768724

Attention: OUI Internal Audit Division

All complaints submitted through the designated whistle blowing channels will be received directly by the Internal Audit Division of Osaki United International Pte Ltd, the parent company of EDM I Limited.

The official whistleblowing channels are also prominently featured on the EDM I Australia's website, providing third parties with a convenient means to report any instances of misconduct.

#### **4.4.3 Work Health and Safety Policy**

EDM I Australia is committed to ensuring the health, safety and wellbeing of our employees, contractors and visitors. There is a policy in place to ensure legal compliance and proactively mitigates the risk of accidents, prioritizing a safe and secure working environment for all.

### **5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

EDM I Australia continuously assesses the effectiveness of our efforts to prevent modern slavery in order for us to understand and continually improve how we identify, prevent, and mitigate relevant risks. It also helps us assess the effectiveness of our grievance and remediation processes if we identify that we have caused or contributed to modern slavery-related impacts.

Key measures we use to assess our approach include:

- (a) The number of business partners screened to ensure adherence to the EDM I Business Partners Code of Conduct;
- (b) Audits on the Suppliers' practices;
- (c) Tracking employee training completion and following up with each individual employee where necessary to ensure full completion of obligatory training related to the EDM I Australia Code of Business Ethics and Conduct; and
- (d) The robustness of our whistle-blowing mechanism.

## 6. CONSULTATION WITH OTHER FUNCTIONS IN EDM I GROUP


EDMI Pty Ltd has taken the lead in preparing this Statement. Statement preparation has involved engagement with representatives of EDM I Gas Pty Ltd as joined entity and its board.

EDMI Australia also consulted EDM I Group key functions supporting EDM I Australia, including Procurement, Supply Chain and Risk, Legal and Compliance. This process entailed the exchange of knowledge on human rights, including compliance with modern slavery regulations, among employees from EDM I Australia and EDM I Group.

## 7. APPROVAL

This Statement for FY2023 is made pursuant to section 14 of the Modern Slavery Act 2018 (*Cth*) and constitutes EDM I Australia's Modern Slavery Statement. This Statement has been approved by the Board of Directors of EDM I Pty Ltd, on behalf of its joined reporting entity, EDM I Gas Pty Ltd, who will review and update the Statement as necessary, on an annual basis.

### EDMI PTY LTD

Signed	:	
Name of	:	_____
Director	:	<b>Roy Stephen Kirsopp</b>
Date of	:	_____
Approval	:	26 June 2024