

A world of  
new energy



# Modern Slavery Statement

2021



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## Message from the CEO



EDL continues to grow and progress towards our vision to be the leading global producer of sustainable distributed energy.

For EDL, producing sustainable energy is not just about helping our customers and communities transition to zero carbon emissions energy.

It's also important to us that every single person involved in the production of EDL's clean, reliable energy solutions—from our employees to the people who produce the goods and services we need—has their human rights respected, and is free from exploitation.

That's why EDL introduced our Human Rights Policy in 2021, which covers human rights as described in the UN Guiding Principles on Business and Human Rights, including the issue of modern slavery.

This is just one of EDL's actions in 2021 to continue our efforts to identify and address modern slavery risks that may exist within our supply chains, and across our operations. These efforts are detailed in this 2021 Modern Slavery Statement, EDL's second.

EDL has not identified any known modern slavery practices within our global business or supply chains to date. That said, we recognise that as a participant in the world's increasingly connected global economy, EDL must maintain our ongoing vigilance and efforts to play our part in eradicating modern slavery.

This is my commitment and the commitment of the relevant directors of each of the reporting entities that make up EDL.

This 2021 statement was approved by the relevant boards of DUET EDL Pty Ltd and Energy Developments Pty Ltd on 9 June 2022 and EDL Holdings (Australia) Pty Limited on 13 June 2022.

A handwritten signature in black ink, which appears to read 'J Harman'. The signature is stylized and fluid.

James Harman  
Chief Executive Officer  
13 June 2022



## About this statement

### Overview

EDL's 2021 Modern Slavery Statement focuses on our continued implementation of measures to gain greater insight into our supply chains and mitigate modern slavery risks. These efforts build on our previous work, as reported in our inaugural Modern Slavery Statement, to:

- better understand the potential risks of modern slavery within EDL and our supply chains
- review existing processes and procedure, and implement new ones, to reduce such risks.

Our 2021 investigations were focused on our employees and major suppliers, and did not identify any instances of modern slavery in our operations or supply chain. As part of our commitment to continuous improvement, we will continue efforts to identify and address risks of modern slavery.

Our operations are based in countries that are recognised as having a low jurisdictional risk of modern slavery, and are primarily conducted by our own skilled employees. In the limited circumstances where core activities are outsourced, we engage specialist reputable contractors and consultants, which inherently reduces the risk of exposure to modern slavery.

To run our sustainable energy business, EDL procures fuel collection, electricity generation and gas processing plant and equipment, mostly from long-term global suppliers who are headquartered in countries that are recognised as having low jurisdictional risk for modern slavery. That said, some ancillary activities conducted within or in connection with our business have the potential to involve modern slavery risks. These include activities:

- through our cleaning contractors, personal protective equipment (PPE) suppliers (including COVID related PPE), and telecommunications and electronic equipment providers
- within the extended supply chain of specialist battery and solar equipment suppliers (associated with the production of certain raw materials used in the manufacture of this equipment).

### Developing this statement

EDL has established a modern slavery working group, including representatives from the procurement, finance, human resources, and legal teams to develop EDL's Modern Slavery Statements. These teams each perform key shared functions across EDL's group companies and are well apprised of the risks faced by each entity.

As these key functions are shared and centralised, and the various EDL entities apply uniform policies and practices (excluding minor differences to reflect different regions of operations), we believe that formal consultation between EDL's technically separate entities (including subsidiary companies owned by EDL reporting entities) was not necessary to identify, assess and implement actions to address any modern slavery risks.

This working group consulted, as necessary, with subject matter experts within EDL's business to develop this 2021 statement.

The statement was reviewed by EDL's Audit Committee, and subsequently approved for publication by the Board of Directors of each of the reporting entities (see below).

## Reporting entities and corporate/business structure

This is a joint Modern Slavery Statement for the period 1 January 2021 to 31 December 2021 by three members of the Energy Developments Group (in this statement, 'EDL', 'we', 'our' and similar) – DUET EDL, Energy Developments and EDL Holdings—under the Australian modern slavery laws—comprising the Modern Slavery Act 2018 (Cth).

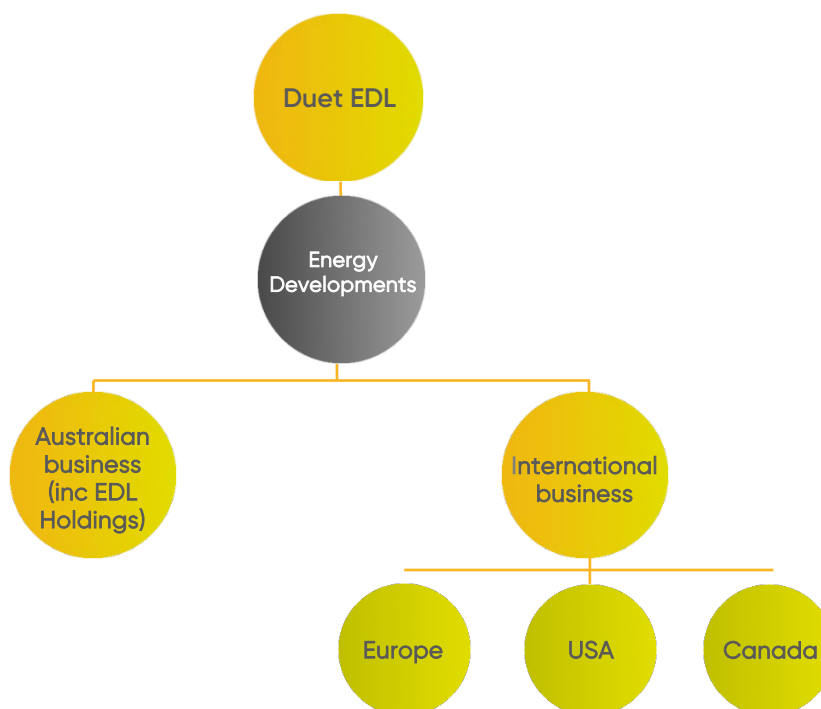
These three members are reporting entities under the Australian modern slavery laws:

Reporting entity	Details	Description
<b>DUET EDL</b>	DUET EDL Pty Limited ABN 91 607 005 685	DUET EDL is the sole shareholder of Energy Developments, and, as with EDL, is ultimately owned by the CK William Consortium.
<b>Energy Developments</b>	Energy Developments Pty Limited ABN 84 053 410 263	Energy Developments is a wholly owned subsidiary of DUET EDL.
<b>EDL Holdings</b>	EDL Holdings (Australia) Pty Limited ABN 67 058 224 481	EDL Holdings is a wholly owned subsidiary of Energy Developments and is a holding company for the majority of EDL's Australian businesses.

Notes: the CK William Consortium is ultimately owned by three Cheung Kong companies listed on the Hong Kong Stock Exchange, namely (a) CK Infrastructure Holdings Limited (Hong Kong Stock Exchange Code: 1038 "CKI"); (b) CK Asset Holdings Limited (Hong Kong Stock Exchange Code: 1113 "CKA"); and (c) Power Assets Holdings Limited (Hong Kong Stock Exchange Code: 0006 "PAH").

The three reporting entities, DUET EDL, Energy Developments and EDL Holdings, are each Australian proprietary companies, limited by shares and having their registered office at Waterfront Place, Level 6, 1 Eagle Street, Brisbane QLD Australia 4000.

EDL's corporate and business structure is outlined below.



## About EDL

EDL is dedicated to a world of new energy for our customers, communities and stakeholders. Our vision is to be the leading global producer of sustainable distributed energy. We play a key role in the world's transition from traditional energy sources to decarbonised solutions.

### Our values



*Safety, health  
& environment*



*Performance*



*Innovation  
& initiative*



*Respect &  
responsibility*



*Integrity*



*Teamwork*

### Our global operations in 2021



*More than 550  
employees*



*More than  
4,000 suppliers*



*1,056MW  
installed capacity*

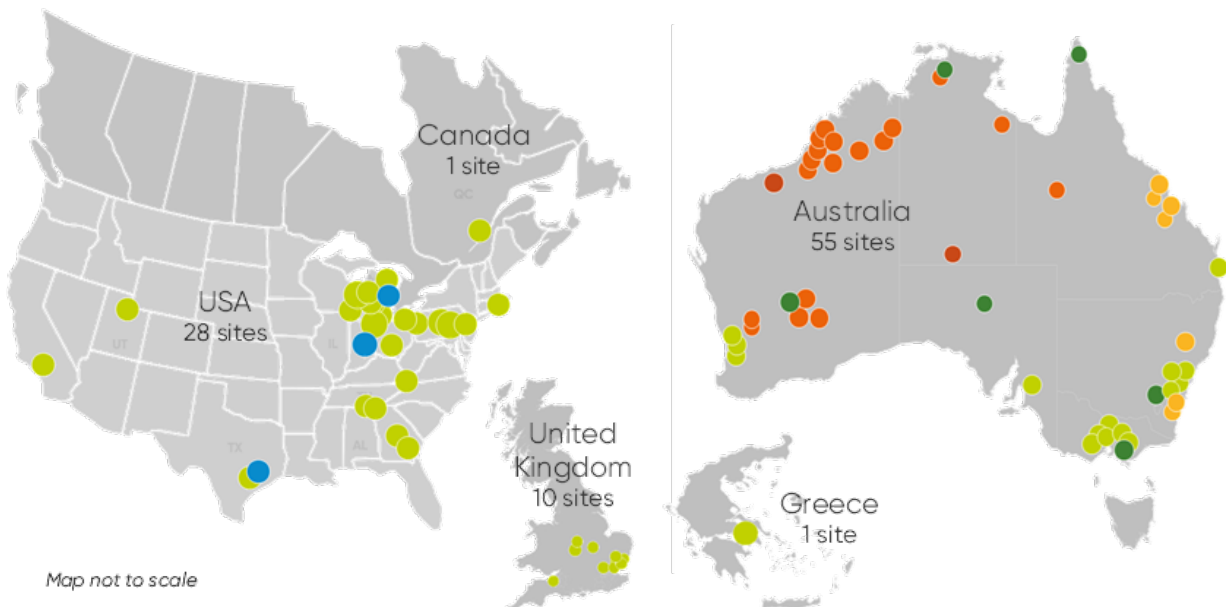


*95 sites in  
three continents*



*4.04 million tCO<sub>2</sub>-e  
abated p.a.*

### Our energy expertise



Landfill gas



Renewables & hybrids



Renewable natural gas



LNG/CNG



Remote energy



Waste coal mine gas

## Key actions to date

EDL's journey to identify and mitigate the risks of modern slavery within our global, sustainable business started several years ago, as reported in EDL's 2020 statement. The following initiatives helped EDL establish a robust foundation for future actions, including those detailed in this 2021 statement:

### Working group

EDL formed a working group of cross-disciplinary senior representatives who:

- undertook training on modern slavery issues, to ensure a strong understanding the topic and EDL's obligations
- developed action plans to frame EDL's approach to modern slavery matters
- undertook a gap analysis (particularly in the context of EDL policies and procedures) enabling the identification areas for improvement and implementation of changes to reduce modern slavery risks for EDL.

### Supplier commitments

EDL took the following steps to ensure that our suppliers' commitment to reducing modern slavery risks is aligned with ours:

- modified our supplier code of conduct
- changed our Australian supplier onboarding process so that new suppliers commit to relevant EDL policies and provide the information we need to assess modern slavery risks
- prepared standard modern slavery clauses for use in our key Australian procurement contracts
- for key suppliers, commenced an assessment of their operations to understand the likelihood of significant modern slavery risks.

### COVID-19 response

When the global COVID-19 pandemic struck, EDL kept our employees safe, and continued to supply our customers and communities with uninterrupted, reliable energy, despite experiencing significant business disruption.

## Key actions in 2021



### New Human Rights Policy

EDL introduced our first global Human Rights Policy, which covers human rights as described in the UN Guiding Principles on Business and Human Rights, including modern slavery. This policy sets out our expectations of EDL employees in the way we conduct business, and also that of our suppliers, distributors, consultants and business partners, and their employees, subcontractors and agents.

### Supplier commitments

EDL recognises that our suppliers are an essential part of our service delivery and a key component of our efforts to reduce modern slavery risks. In 2021, we:

- used new modern slavery clauses in new standard Australian EDL procurement contracts
- implemented our new UK supplier onboarding process and continued implementation of the EDL Australian supplier onboarding process
- continued with the roll-out of our updated supplier code of conduct.

We also undertook ad hoc supplier surveys when procuring services or equipment that had the potential for heightened modern slavery risks. For example, EDL conducted a survey of a solar panel supplier when procuring solar panels for a new project, to better understand and keep our customers apprised of any associated modern slavery risks. This process did not identify any confirmed instances of modern slavery practices, and it highlighted the importance of conducting specific modern slavery reviews with suppliers when procuring equipment that has the potential for heightened modern slavery risks.

These measures have helped EDL in understanding our suppliers' modern slavery risks, and encourage our suppliers to mirror our commitment to reducing modern slavery risk.



### Top-tier supplier assessment

EDL's key suppliers are collectively responsible for approximately 60% of our annual expenditure. We continued work to identify the existence or likelihood of significant modern slavery risks in our supply chain, and to better understand how our key suppliers identify and manage modern slavery risks. This included:

- obtaining and evaluating modern slavery statements (or equivalent) of each key supplier
- for key suppliers who did not have a modern slavery statement (or equivalent), working with them to conduct a survey on measures within their business to identify and address modern slavery risks.

### COVID-19 response

As the impact of COVID-19 continued to be felt around the world, EDL kept our employees safe (including by supporting work-from-home arrangements and providing mental health assistance), and maintained close to business-as-usual operations globally.





## Modern slavery risk assessment

EDL continued utilising a risk assessment-based approach to modern slavery in 2021, where we considered factors such as:

- the country of employment and broader human rights (such as equality, fair pay and safety) applicable to our employees
- our top-tier suppliers (based on our annual expenditure with them) and the location of their headquarters and key operations
- the types of industries we operate in
- likely risk factors associated with our supply chain.

Our findings are outlined in the following sections.

## Our corporate governance framework

### Supported from the top

The Board of Directors and management of EDL (and other EDL companies) are committed to having a robust corporate governance framework to support our vision to be a leading global producer of sustainable distributed energy.

### Current, relevant and effective policies

EDL's policies cover human rights, workplace health and safety, supplier and contractor management, and diversity and inclusion, including Aboriginal and Torres Strait Islander participation for EDL's Australian operations. These policies are supported by mandatory employee training and contractor undertakings to encourage behaviour across our global operations that:

- is respectful and tolerant of difference
- supports Aboriginal and Torres Strait Islander and minority populations
- focuses on maintaining and continuously improving safe work practices (including stringent workplace health and safety requirements, monitoring and reporting)
- supports good mental health.

Through its whistleblower policy and the external FairCall whistleblower service EDL encourages and supports the reporting of concerns or misconduct, and enables appropriate investigation of reported instances.

We regularly review our policies to ensure that they remain current, relevant and effective.

Various changes to policies and procedures previously rolled out have continued to be applied in 2021 and apply to all EDL employees and relevant contractors.

## Our people

EDL's workforce comprises mostly employees rather than outsourced contract personnel.

### Recruitment process

EDL recruits most of our employees directly, instead of through recruitment/labour brokers. In addition, our employees negotiate the terms of their employment with us, reducing the risks of modern slavery in our recruitment processes.

### Working conditions

In 2021, we had more than 550 employees. They are employed by EDL companies registered in the relevant jurisdiction of operation (i.e. Australia, the USA, the UK and Canada). These countries have comprehensive employment, workplace health and safety, and anti-discrimination laws, and are recognised as having low modern slavery risks.

EDL workplaces operate under a robust safety management system, which includes monthly reporting, a focus on safety processes and training, and mental health awareness.

We're proud of our strong company culture that fosters a diverse workforce and inclusive working environments. For example, EDL supports flexible working arrangements, which enables us to retain our people as they move through different life stages.

EDL people are well-qualified and most are highly skilled in professional and technical fields. As such, they are remunerated at or above local minimum wage requirements and often enjoy additional employment benefits. Our Australian operations workforce is also governed by enterprise agreements approved by and registered with the Fair Work Commission and subject to review by the Industrial Relations Court.

Our working conditions comply with, or exceed, the requirements of the International Labour Organisation and the Universal Declaration of Human Rights. Accordingly, EDL considers that there is low to minimal risk that EDL employees are subjected to any form of modern slavery while working at EDL.

### Our countries of operation

We operate in five countries—across Australia and the United States of America, and in Canada and the United Kingdom, with an interest in a joint venture in Greece.

None of these countries are recognised as having elevated modern slavery risks.

### Our suppliers

Our suppliers provide the raw materials, fuel, plant and equipment necessary for EDL to run our operations and deliver on our commitments to our customers and communities.

We focus on sourcing reputable and reliable suppliers with whom we can develop long-term relationships for mutually beneficial outcomes.

### Number of suppliers

We have more than 4,000 suppliers globally that provide plant, equipment, materials, and services to EDL.

This spread of spending across many suppliers make it unlikely that significant volumes of expenditure are directed towards any particularly risky area.

## Supply sectors

We assessed the industry sectors where our suppliers mainly operate, and identified the following risks.

Sector	Assessment
<b>Fuels, petroleum products and other power station consumables</b>	<p>EDL uses a variety of hydrocarbon-based fuels, petroleum-based products and other power station consumables (e.g. coolants) in our operations.</p> <p>Gaseous fuels, such as natural gas, landfill gas and coal seam methane, originate in the countries where we operate (which have a low jurisdictional risk of modern slavery).</p> <p>Diesel fuel, petroleum-based products (e.g. oils and oil-based lubricants) and other power station consumables (e.g. coolants) either originate in the countries where we operate or are imported, and as such may originate from, or be processed in, countries that have a higher jurisdictional risk of modern slavery than the countries where we operate.</p>
<b>Gas capture and processing equipment</b> <b>Electricity generators and storage solutions</b>	<p>We procure a variety of plant and equipment for our operations. These include:</p> <ul style="list-style-type: none"> <li>plant and equipment needed to capture, reticulate and process gases (including landfill gas, waste coal mine gas and natural gas) such as gas pipeline equipment</li> <li>diesel and gas generators, solar PV panels, wind turbines, batteries, electrical storage solutions and inverters.</li> </ul> <p>These items are manufactured in numerous countries, which have varying modern slavery risk factors. Additionally, some raw materials (such as polysilicon) used in certain plant and equipment, especially solar PV panels and large scale batteries could originate from countries known to have a high risk of modern slavery.</p> <p>The increasing use of solar PV panels and large-scale batteries in new projects, consistent with a general increase in the take-up of decarbonised energy solutions, has been identified as an emerging modern slavery risk issue given the publicised risks of modern slavery practices in raw material supply chains. While we do not have any known instances of actual modern slavery issues in our supply chains, we are having ongoing discussions with our preferred suppliers of solar PV panels and large-scale batteries to better understand these risks and this remains a focus area for the business.</p>
<b>Fleet and transportation services</b>	<p>We procure these types of services to move some fuels from the processing facility to our power stations, as well as to get plant and equipment to site.</p> <p>Although these services are typically provided in the low-risk countries where we operate, the lower skill requirements of workers involved in these services do create a higher potential for modern slavery risks.</p>

Sector	Assessment
<b>Professional and technical services</b>	<p>We source a variety of professional and technical services from external organisations, including specialist technical design, construction, testing, commissioning and maintenance services, and legal, financial and other professional advice.</p> <p>As these services are typically provided by highly-skilled and professional people, such as engineers, lawyers and accountants, the risk of modern slavery in this sector is low.</p>
<b>Facilities management</b>	<p>This sector includes cleaning, catering, and waste management services. By its nature, this sector attracts lower-skilled and transient workers, increasing the risk of modern slavery.</p>
<b>Personal protective equipment (including COVID related) and workwear</b>	<p>These items include the supply of personal protective equipment such as gloves and goggles, as well as safety uniforms. For 2021, it also included COVID related goods such as face masks, alcohol wipes, hand sanitiser and rapid antigen tests.</p> <p>We are aware that such items are often produced in countries with lower levels of relevant government oversight and due diligence, which leads to an increase in modern slavery risks.</p> <p>In addition, there are industry risks associated with certain raw materials used in workwear and COVID related goods, and COVID related goods in particular were often difficult to obtain during 2021 with supply sources coming from a new range of suppliers.</p>
<b>Office services</b>	<p>This sector includes the supply of information technology and computer equipment. This area has known modern slavery risks, principally due to jurisdictions where these goods are manufactured or supplied.</p>

### Jurisdictional risk

We carried out jurisdictional risk assessments of our top-tier suppliers.

Most of these suppliers are part of large corporate groups that operate globally, and are headquartered in countries such as Australia, the United Kingdom, France, Germany, Switzerland, Austria, Finland and the USA. These countries are rated as having a low jurisdictional modern slavery risk, including because of the strong labour protection laws in those countries. However, a small proportion of our top-tier supplier expenditure is with suppliers that are headquartered in countries identified as having higher risk profiles in relation to modern slavery risks.

Jurisdictional risk is considered as part of the process of assessing new suppliers.

### Cultural alignment

In selecting suppliers, EDL considers various factors and seeks to contract with suppliers whose ethics, culture, values and practices align with ours, so we can establish stable, long-term working relationships to support our projects through operations. This alignment is, and will continue to be, enhanced by requiring our suppliers to commit to complying with our policies, as well as including appropriate provisions in our supply contracts.

### Supplier personnel

Our supplier personnel is divided into several categories, including:

- skilled personnel who directly provide us with professional and niche technical services—due to the highly-skilled nature of these personnel, the risk of modern slavery in this sector is low
- unskilled personnel who directly provide us with general services (such as our transportation and facilities management services)—these areas tend to attract lower-skilled and transient workers, resulting in a relatively elevated risk of modern slavery
- personnel involved further down the supply chain, for example in the production of raw materials and the manufacture of our plant and equipment (ranging from pipeline and power generation assets to computer equipment).

We address the risk of modern slavery to supplier personnel by:

- contractually requiring our suppliers to adhere to relevant laws. For suppliers whose personnel attend our project sites, we require compliance with workplace health and safety laws, safety standards, and relevant inductions, policies and procedures—both ours and those of our customer (as appropriate).
- including specific provisions in our contracts requiring our suppliers to commit to behaviours that reduce the risk of modern slavery.
- requiring our suppliers to meet the standards and outcomes set in our relevant policies during our supplier onboarding process.

### Country of origin for raw materials, consumables and fuel

Due to the nature of our business, most of the consumables and fuel used at our project sites are sourced locally while some are trucked within the relevant country. These countries are recognised as having generally low risks of modern slavery.

The major consumables and fuel sourced overseas include diesel, engine parts and balance of plant parts.

We are broadly aware that some materials originate in countries with modern slavery risks that are higher than the countries in which we operate, and information about the origins of the raw materials for our plant and equipment will become progressively available to us through our supplier-related changes. This will allow us to better assess relevant risks associated with the country of origin. In the meantime, we are including appropriate provisions in our supply contracts for these materials and asking these suppliers to commit to meet the standards and outcomes set in our relevant policies.

### Country of manufacture

Most of EDL's materials, plant and equipment expenditure relate to core assets used for our electricity generation, gas production and waste fossil fuel capture.

We are aware that many of these assets are manufactured in a range of countries. In a similar process to the assessment of raw materials, we ask our suppliers to provide information on the country of manufacture, which allows us to assess jurisdictional risks associated with that country, so that we can tailor our supplier base. We have included relevant provisions in our supply contracts and asked our suppliers to commit to our relevant policies.



### Assessment of our actions

EDL's focus in 2021 was the implementation of previously established plans and processes to identify and address modern slavery risks, including implementation of actions to reduce the risk of modern slavery in our operations and supply chains.

In the years ahead, we will continue to assess the effectiveness of these actions through regular monitoring and carrying out annual modern slavery risk assessments.

EDL has a culture supportive of openness and transparency with dedicated confidential avenues for reporting. We have not identified any known modern slavery practices within our business operations or through our supply chain at this time.

## Plans for 2022 and beyond

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### Policy updates

We will continue to review and update EDL's policies and supplier code of conduct as required to appropriately reference modern slavery risks.

We will also communicate any policy updates to EDL employees and contractors across our global operations.



### Continuous supplier engagement

We will continue to improve processes and procedures as appropriate, and further engage with and review our suppliers, to help support positive change within our industry.

### Effectiveness review

We will undertake regular reviews of our approach to monitor our effectiveness in mitigating the risks of adverse impacts on human rights.



### Managing identified risks

If any specific risks are identified through the year, we will review and respond with mitigation measures.

## Appendix: Addressing the mandatory reporting criteria

Australian Modern Slavery Act mandatory reporting criterion	Reference in this statement
Identify the reporting entity	See "Reporting entities and corporate/ business structure" at page 4.
Describe the reporting entity's structure, operations and supply chains	See "Reporting entities and corporate/ business structure" at page 4, "About EDL" at page 5, and "Modern slavery risk assessment" at pages 8 to 13.
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	See "Modern slavery risk assessment" at pages 8 to 13.
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address risks, including due diligence and remediation processes	See "Key actions to date" at page 6 and "Key actions in 2021" at page 7.
Describe how the reporting entity assesses the effectiveness of such actions	See "Assessment of our actions" at page 13 and "Plans for 2022 and beyond" at page 14.
Described the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	See "Developing this statement" at page 3.
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Refer to the balance of this modern slavery statement.