



# **Modern Slavery Statement FY2024 Australia**

**STATEMENT REGARDING THE MODERN SLAVERY ACT 2018 (Cth) AUSTRALIA**  
**(FY2024)**

## **1. INTRODUCTION**

### **1.1 Reporting Entity**

This Modern Slavery Statement (“**Statement**”) is made in accordance with the Modern Slavery Act 2018 (Cth) (Australia) (“**Australia Modern Slavery Act**”) and applies to **EDMI Pty Ltd (ACN 010 061 391)** which is identified as a reporting entity. This Statement covers the reporting period from 1 January 2024 to 31 December 2024 (“**FY2024**”).

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

### **2.1 EDM I Structure and Operations**

EDMI Pty Ltd (ACN 128 174 658) is a wholly owned subsidiary of EDM I Pty Ltd. EDM I Pty Ltd and EDM I Gas Pty Ltd (collectively “**EDMI Australia**”) are part of the EDM I group of companies (“**EDMI Group**”), with their ultimate parent company, EDM I Limited, headquartered in Singapore.

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, including smart meters and provide solution services and energy management services that utilise energy measurement and control technologies, as well as solutions utilising IoT.

### **2.2 EDM I Supply Chain**

EDMI Group works with various 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 Group 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 EDM I 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, EDM I Group conducts risk assessments throughout the reporting period, targeting potential areas where such practices may exist.

During FY2024, 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 complies to the Australia Modern Slavery Act. EDM I Group works with our business partners to ensure regular supply chain audits and site inspections are conducted. In FY2024, suppliers that meet a certain purchase threshold value and/or have a high-risk profile (“**Suppliers**”) were required to complete an EDM I Business Partner Code of Conduct survey.

The survey requires the Suppliers to answer various questions which included but were 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 Employee Training Programs:**

As an integral part of the new hire on-boarding process at EDM I Australia, all 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. 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 are covered with the intention that such 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 I Australia hopes to ensure that all team members are aligned with the organization’s values and could play a crucial role in maintaining a supply chain that is free from risks of modern slavery.

EDMI Australia's undertakes obligatory annual refresher training programme for all employees.

### **4.3 Supplier Audits and Certification:**

EDMI Australia is committed to playing an active role in preventing modern slavery in all forms, including forced labour, child labour, and human trafficking. As part of this commitment, EDM Australia aims to work with suppliers who share our values and take meaningful steps to uphold human rights and fair working conditions across their operations and supply chains.

#### **4.3.1 Certifications**

EDMI Group encourages its key suppliers to obtain and maintain certifications from recognised programs such as Supplier Ethical Data Exchange (SEDEX), the Responsible Business Alliance (RBA), or EcoVadis, which when applied is used to assess a range of ethical and sustainability factors, including policies and practices designed to identify, manage, and reduce the risks of modern slavery.

EDMI Australia's primary supplier is EDM Limited. A key supply chain milestone achieved in 2024 was the successful completion of the SEDEX audit by the manufacturing business within EDM Group.

Suppliers are expected to take responsibility for identifying and managing any potential modern slavery risks in their own operations and extended supply chains. This provides assurance to EDM Australia that its suppliers are taking modern slavery risks seriously and are aligned with EDM Australia's expectations for responsible and transparent business conduct.

EDM Australia remains focused on working with suppliers who are committed to continuous improvement and raising standards in areas such as worker welfare, safe working conditions, and human rights. By building strong, ethical partnerships, EDM Australia believes it can contribute to the broader goal of eliminating modern slavery from global supply chains.

### **4.4 EDM Australia Policies:**

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

EDMI Australia Code of Conduct and Business Ethics (“**Code**”) 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 departments.

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, EDM I’s Whistle Blowing policy aims to provide an avenue for employees and third parties to report misconduct, including those relating 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 designated 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**

EDMI Australia is committed to ensuring the health, safety and well-being 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**

EDMI Australia continuously assesses the effectiveness of our efforts to preventing 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 Code; 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 and its board.

EDMI Pty Ltd also consulted EDM I Group key functions supporting EDM I Australia, including Procurement, Supply Chain and 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 FY2024 is made pursuant to section 13 of the Australian Modern Slavery Act and constitutes EDM I Pty Ltd.'s Modern Slavery Statement. This Statement has been approved by the Board of Directors of EDM I Pty Ltd, on its own behalf and as a parent company of EDM I Gas Pty Ltd, who will review and update the Statement as necessary, on an annual basis.

#### EDM I PTY LTD

Signed :   
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Name of Director : **Roy Stephen Kirsopp**  
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Date of Approval : 11 June 2025  
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