STATEMENT REGARDING THE MODERN SLAVERY ACT IN UK (FY2023)

1. INTRODUCTION

1.1 Reporting Entities

This Modern Slavery Statement is made in accordance with the U.K. Modern Slavery Act 2015 and applies to **EDMI Europe Limited**. This statement covers the reporting period from 1 January 2023 to 31 December 2023 ("**FY2023**").

2. ORGANISATION STRUCTURE AND SUPPLY CHAINS

2.1 EDMI Structure and Operations

EDMI Europe Limited ("**EDMI Europe**") is part of the EDMI group of companies ("**EDMI Group**"), with their direct parent company, EDMI 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 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 EDMI Supply Chain

EDMI Europe works with different business partners, from logistics suppliers to subcontractors for finished goods, relating to our gas, electricity and communication hub products and solutions; distributors and vendors of our products; regulatory and certification bodies and others. Where possible, we maintain 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 are contractually bound to abide by our standards on quality, ethics, and human rights.

3. RISK OF MODERN SLAVERY PRACTICES IN EDMI OPERATIONS AND SUPPLY CHAINS

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.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

4.1 Due Diligence Processes

4.1.1 Comprehensive Supplier Audits and Site Inspections:

EDMI Europe maintains a steadfast commitment to ethical manufacturing practices through the regular conduct of comprehensive supply chain audits and on-site inspections. These diligent assessments are integral components of the company's overarching strategy to ensure that the entirety of its supply chain aligns with ethical labour standards.

4.1.2 Business Partners Code of Conduct:

EDMI Europe ensures that its supply chain is complying to the Modern Slavery Act 2015. 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.

4.1.3 Training on modern slavery and trafficking:

As an integral part of the on-boarding process at EDMI Europe, newly hired employees undergo comprehensive training programs specifically tailored to address modern slavery risks. These sessions are designed to impart a thorough understanding of the company'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, EDMI Europe 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. We conduct annual refresher trainings for all employees within EDMI Europe.

4.2 Policies in relation to slavery and human trafficking

4.2.1 Code of Conduct and Business Ethics

EDMI Europe 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.

4.2.2 Whistle Blowing Policy

EDMI Europe 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; 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 whistleblowing channels will be received directly by the Internal Audit Division of Osaki United International Pte Ltd, the parent company of EDMI Limited.

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

4.2.3 Work Health and Safety Policy

EDMI Europe 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. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

EDMI Europe 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 EDMI Business Partners Code of Conduct;
(b) Tracking employee training completion and following up with each individual employee where necessary to ensure full completion of obligatory training related to the EDMI Europe Code of Business Ethics and Conduct; and
(c) The robustness of our whistle-blowing mechanism.

6. CONSULTATION WITH OTHER FUNCTIONS IN EDMI GROUP

We consulted EDMI Group key functions supporting EDMI Europe, 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 EDMI Europe and EDMI Group.

7. APPROVAL

This Statement for FY2023 is made pursuant to section 54 of the Modern Slavery Act 2015 (UK) and constitutes EDMI Europe's Modern Slavery Statement. The Statement has been approved by the Board of Directors of EDMI Europe Limited, who will review and update it as necessary, on an annual basis.

EDMI EUROPE LIMITED

Signed	:	
Name of Director	:	**Roy Stephen Kirsopp**
Date of Approval	:	27 June 2024