
Fighting Against Forced Labour and Child Labour in Supply Chains

2023 Report

Metergy Solutions Inc.



Introduction

This report (the “**Report**”) has been prepared by Metergy Solutions Inc., (“**Metergy**” and throughout this Report “**our**” and “**we**”) for the financial year ended December 31, 2023, pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This is Metergy’s first report under the Act.

Metergy recognizes its responsibilities to ensure that forced labour and child labour is not occurring in any part of our business or supply chain. We are committed to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights, including but not limited to:

1. operating with leading health and safety practices to support the goal of zero serious safety incidents;
2. fostering a positive work environment based on respect for meritocracy, valuing diversity and having zero tolerance for workplace discrimination, violence or harassment; and
3. the prohibition of human trafficking, forced labour and child labour.

We recognize that the risks of human rights violations, human trafficking, forced labour and child labour are complex and evolving, and we will continue to work on addressing them in our business. Our approach and processes are periodically reviewed and, where appropriate, updated as necessary to reflect changes in circumstances and practice.

Summary of Key Activities in 2023

In preparation for the introduction of the Act, we worked with the representatives from our risk and legal teams as well as with external counsel to understand the requirements of the Act.

Our Business Activities

Metergy is a market-leading provider of turnkey submetering solutions for developers and property managers. Services include: a) submeter supply, installation, commissioning, reading and reverification; b) resident billing and collections; and c) utility energy solutions.

Assessing Forced Labour and Child Labour Risk

Our approach to addressing forced labour and child labour is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector.

Forced Labour and Child Labour Risk Profile

1. Third-Party Vendors

Given the nature of our business, third-party suppliers and vendors used across Metergy’s businesses generally fall under the below categories:

- *Outsourcers*: Where a business activity or professional service is outsourced to another organization.
- *Vendor Software Providers*: This includes off-the-shelf software, that is hosted in Metergy data centers, including hardware vendors used to facilitate business processes.

- *Cloud/Hosted IT Services*: Encompasses a range of IT services provided in various formats.
- *Professional Services*: Includes consulting, legal, human resources, accounting, training, tax, audit, banking and education.
- *Suppliers*: This includes suppliers and vendors of components and finished goods required for submetering services.
- *Contractors*: Includes entities that provide installation services relating to submetering equipment such as electricians or plumbers.

Metergy continuously strives to achieve excellence with respect to our contracting practices because we believe that adequately compensated and trained workers, operating in fair working conditions deliver high-quality products and services. We believe that the risk of forced labour and child labour within the majority of our third-party vendors is low. This assessment is based on the regulated industries and jurisdictions in which they operate and the skill of the professionals providing such services. However, we acknowledge that, to a lesser extent, we may engage with suppliers who may be considered higher risk in terms of forced labour and child labour. We recognize that each of our suppliers has its own supply chain, and our vendor assessments consider this risk where appropriate and possible. We currently have limited visibility of the extended supply chains, excluding circumstances where subcontractors or materials require our approval.

2. Employees

Our people drive our success. Metergy has human resources policies, procedures and processes in place designed to protect against human trafficking, forced labour and child labour in Metergy's employee population. These include:

- employment conditions;
- processes for reporting and resolving staff concerns and grievances;
- non-discriminatory hiring practices;
- employment screening (including work eligibility checks); and
- appropriate workplace behavior.

Through our Positive Work Environment Policy, all employees are responsible for creating a respectful environment and are required to identify and report workplace discrimination, violence and harassment as it occurs. Metergy's employees are required to certify annually that they have read and complied with the Positive Work Environment Policy.

Based on the above, we consider that there is a low risk of forced labour and child labour within employee population of Metergy.

Management of Forced Labour and Child Labour Risks

1. Governance

We recognize that strong governance is essential to sustainable business operations, and we aim to conduct our business according to the highest ethical and legal standards. Our approach to addressing forced labour and child labour is designed to be commensurate with the risks we face, which vary based

on several factors, including jurisdiction, industry and sector. Key supporting policies and guidelines (together, the “**Policy Framework**”) include, but are not limited to:

CODE OF BUSINESS CONDUCT AND ETHICS

Metergy’s Code outlines our commitment to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights. Employees are required to certify annually that they have read and complied with the Code and the protocols incorporated therein.

WHISTLEBLOWER POLICY

Metergy is committed to conducting business with honesty and integrity and employees are expected to maintain high standards. This Policy clearly sets out the expectations of reporting and responsibilities, and outlines whistleblowing procedures addressing how to raise a concern, confidentiality, as well as remediation, external disclosures and our zero tolerance for retaliation or malicious acts.

POSITIVE WORK ENVIRONMENT POLICY

This Policy outlines our commitment to providing a workplace free of discrimination, violence and harassment and summarizes the responsibilities of employees to understand: (i) what constitutes workplace discrimination, violence and harassment; (ii) their obligations to maintain an environment where these behaviors are not tolerated; and (iii) how to report incidents following proper procedures.

ANTI-BRIBERY AND CORRUPTION POLICY

This policy is designed to prevent payment of bribes or facilitation payments in furtherance of business (including bribes that may contribute to forced labour and child labour).

Preventing the onboarding of those involved in financial crime, such as bribery and facilitation payments, identifying suspicious or criminal activity and making reports to the relevant authorities not only supports the fight against bribery and corruption, but also the fight against forced labour and child labour by association.

Our Policy Framework is reviewed periodically and updated as necessary.

2. Training

Our Learning Management System (“LMS”) gives us the flexibility to deliver a range of legal compliance training content to Metergy employees. We continue to raise awareness and commit to providing human rights training to new employees as part of the onboarding process and ensure that they access ongoing training, as necessary.

3. Remediation

We have not found any evidence of forced labour or child labour. Where possible, we will seek to use our leverage to address any issues that we discover.

4. Whistleblowing Hotline

Metergy maintains a reporting hotline (“**Hotline**”) for employees, vendors, partners and other interested parties to anonymously report, among other things, any matters relating to suspected unethical, illegal, unsafe or other unwanted behaviors. Forced labour and child labour, as well as human trafficking issues

are reportable on the Hotline. The Hotline is managed by an independent third party and is accessible 24/7 by telephone (toll free) or by submitting an anonymous report online. The Hotline is available in multiple languages to mitigate any language barriers and to provide information to those intending to report.

5. Measure of Effectiveness

Metergy acknowledges that child labour, forced labour and human trafficking are possible risks within our operations and supply chain. We undertake various steps to address these risks, including reviewing our policies and business practices to ensure they reflect our commitment to:

- implementing and enforcing effective systems and controls designed to reduce the risk of child labour and forced labour in our business and supply chains; and
- transparency through our disclosure obligations.

We monitor and assess the effectiveness of our forced labour and child labour policy framework through:

- regular engagement and feedback from key stakeholders, including through active promotion of our reporting Hotline; and
- operational risk and mitigation plan reporting to the board of directors and senior executives.

Forward-Looking Statement

We recognize the need to remain alert to forced labour and child labour and human trafficking risks.

In 2024, we will continue to work towards improvement of the measures we already have in place to identify and address forced labour and child labour risks. Actions we aim to take in 2024 include:

- Develop and implement an Anti-Modern Slavery and Human Rights Policy to codify Metergy's approach to minimizing the risk of forced labour and child labour within its business and supply chain;
- Develop and implement a Vendor Code of Conduct to outline our expectations of vendors that provide goods or services to Metergy and, where appropriate, vendor contracts should include acceptance of the Vendor Code or reference to equivalent vendor policies;
- Continue to leverage our LMS to provide an online course to Metergy employees and team members on forced labour and child labour; and
- Identify current suppliers' risk of forced labour and child labour through development and implementation of a risk assessment procedure to assess our suppliers' risk.

Approval

This Report has been approved by Metergy's board of directors on May 30, 2024 in accordance with Section 11(4)(b)(i) of the Act.

Metergy Solutions Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Metergy. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in

all material respects, for the purposes of the Act, for the reporting year listed above.

Mark Murski

Name: Mark Murski

Title: Director

Date: May 30, 2024

I have the authority to bind Metergy Solutions Inc.