

# Legal Statement

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## **Energy Flux North America, Inc. Modern Slavery and Human Trafficking Statement**

Fiscal Year ending December 31, 2016

### **UK Modern Slavery Act of 2015**

The United Kingdom's Modern Slavery Act 2015 requires that businesses supplying goods and/or services in the United Kingdom report annually on the policies and practices utilized to prevent human trafficking and slavery in their operations and supply chain. This Statement is posted pursuant to section 54(1) of the Act for Energy Flux North America LLC's fiscal year ending December 31, 2016.

### **Our Business**

Energy Flux North America is a leading provider of energy intelligence software and related solutions. These solutions unlock the full value of energy management for commercial, institutional and industrial end-users, including the reduction of real-time demand for electricity.

Energy Flux North America's business model is focused on software and professional-services solutions, and, as such, we rely sparingly on suppliers. Despite this lower overall risk of unethically-sourced labor, Energy Flux North America is proud to issue this statement to enumerate the steps that we have taken to mitigate the threat of slavery and human trafficking as part of our business and supply chain.

## **Our Commitment**

Energy Flux North America has opposed and continues to oppose slavery and human trafficking in all aspects of our business. We encourage all employees to comply with the laws and regulations in all countries in which they operate. As part of this process, Energy Flux North America emphasizes to its employees the importance of the Energy Flux North America Corporate Code of Conduct and Ethics ("Code of Conduct"), which requires adherence to all applicable laws and regulations. Each employee receives a copy of the Code of Conduct when he or she is hired, and every year thereafter.

Energy Flux North America provides an anonymous ethics hotline for its employees to safely call attention to ethical issues they may observe or perceive. As part of the Code of Conduct, we encourage employees to utilize this confidential hotline to relay any concerns. This hotline is independently operated and overseen.

## **Our Supply Chain**

Energy Flux North America has opposed and continues to oppose slavery and human trafficking in all aspects of our supply chain. Energy Flux North America will not support or deal with any business knowingly involved in slavery or human trafficking. Energy Flux North America encourages and requires all employees and third-party suppliers to comply with the laws and regulations in all countries in which they operate. Energy Flux North America requires all individuals or entities acting on its behalf to know, understand, and abide by all applicable laws and regulations, including employment laws.

Our procurement process includes actively screening all third-party suppliers using an industry recognized, regularly-updated tool to determine whether that supplier is included on the Office of Foreign Assets Control sanctions lists and to determine whether that party is otherwise included on a U.S. Government denied-party list. Furthermore, the Company performs periodic reviews of existing customers, agents, consultants, joint venture partners, and other third parties using our restricted-party screening tool.

To ensure our high ethical standards, our subcontracts include a warranty from our subcontractors that they will abide by all relevant regulations and policies, including applicable health, safety, and employment laws. Furthermore, Energy Flux North America is in the process of updating its agreements templates to require subcontractors to represent and warrant that they do not use slave labor. We will further require all new subcontractors to represent and

warrant they comply and will continue to comply with the principles outlined in the United Nation's Universal Declaration of Human Rights.

## **Our Future**

As part of its continued commitment to ethical behavior, Energy Flux North America is in the process of reviewing its supply-chain protocols, and is considering the ratification of a Supplier Code of Conduct to more-clearly relay Energy Flux North America's specific ethical standards with respect to our suppliers' behavior. Energy Flux North America will review its policies on preventing slavery and human trafficking annually.

If you have an ethical or legal concern, please reach out to our Company at [customer.service@energyflux.net](mailto:customer.service@energyflux.net).