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# Fighting Against Forced Labour and Child Labour in Supply Chains

2025 Report

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Metergy Solutions Inc.

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## 1. INTRODUCTION

This report (the “**Report**”) has been prepared by Metergy Solutions Inc., (“**Metergy**” and throughout this Report “**our**” and “**we**”) for the financial year which ended December 31, 2025, pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

Metergy recognizes its responsibilities to ensure that modern slavery 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:

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

We recognize that the risks of human rights violations, human trafficking and modern slavery 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.

## 2. 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.

In the course of our business, we procure materials and components to manufacture submeters and source products from reputable and established suppliers. We employ and subcontract local, qualified personnel to install and maintain our infrastructure, both at client locations and within our facilities.

## 3. SUMMARY OF KEY ACTIVITIES IN 2025

In 2025, Metergy continued to implement certain steps outlined in its previous reports to strengthen our approach to identifying, mitigating, and managing risks related to modern slavery within our operations and supply chain. These initiatives reflect our ongoing commitment to uphold human rights and ethical practices in every aspect of our business.

### a. Combined Human Rights and Anti-Modern Slavery Policy

Metergy’s Human Rights and Anti-Modern Slavery Policy codifies our approach to respecting fundamental human rights and our efforts to identify and prevent human rights violations within our business and supply chain. This policy applies to all Metergy directors, officers, employees and temporary workers and outlines a zero-tolerance approach for all forms of modern slavery, including forced labour and child labour. As further set out below, all Metergy employees are required to complete an annual attestation to confirm their understanding and commitment to this policy. In 2025, 98% of Metergy employees completed this attestation.

### b. Vendor Code of Conduct

Metergy’s Vendor Code of Conduct clearly communicates our expectations for ethical business conduct, labour practices, and respect for human rights among all suppliers and third-party service

providers. In 2025, Metergy conducted a review of our supplier onboarding and vendor due diligence processes and identified opportunities to formalize its process for obtaining vendor confirmations of compliance with the Vendor Code of Conduct. In 2026, Metergy plans to address this gap by integrating Vendor Code of Conduct acknowledgement requirements into our vendor onboarding process.

### **c. Risk Assessment Questionnaire**

In 2024, Metergy developed a Modern Slavery Questionnaire designed to be distributed to vendors based on geographic and sector-based risk assessments, to enhance our visibility into our supply chain and assess the level of modern slavery risk in our operations.

The questionnaire covers areas such as:

- Labour recruitment practices;
- Use of subcontractors;
- Policies and procedures related to modern slavery;
- Training and grievance mechanisms;
- Transparency and audit readiness.

In 2025, Metergy assessed vendor responses and participation in the questionnaire that was distributed to a select group of existing vendors in 2024. Through this process, Metergy identified opportunities for improved controls to collect completed questionnaires from vendors. In 2026, we plan to implement processes to facilitate vendor participation and the systematic collection and review of questionnaire responses, and to integrate a version of the questionnaire into our vendor onboarding process. Metergy plans to use the questionnaire to inform risk assessment and guide future engagement, audits, and capacity-building efforts with vendors.

## **4. ASSESSING MODERN SLAVERY RISK**

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

## **5. MODERN SLAVERY RISK PROFILE**

### **a. 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*: 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*: 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 modern slavery 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 modern slavery. 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 extended supply chains, other than where subcontractors or materials require our approval. As described in Section 3 above, in 2025 Metergy reviewed its supplier onboarding process, vendor due diligence process, and supplier questionnaire, and identified opportunities for improvement which we plan to address in 2026.

## **b. Employees**

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

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

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. In addition, Metergy's Human Rights and Anti-Modern Slavery Policy outlines the rights and responsibilities of all employees and reinforces our zero-tolerance stance toward modern slavery in any form within our operations.

Based on the above, we consider that there is a low risk of modern slavery within the employee population of Metergy.

## **6. MANAGEMENT OF MODERN SLAVERY RISKS**

### **a. 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 modern slavery 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:

#### *HUMAN RIGHTS AND ANTI-MODERN SLAVERY POLICY*

This policy aims to codify our approach to minimizing the risk of human rights violations and modern slavery within our business and supply chain. The policy is intended not only to ensure compliance with legal obligations, but also to promote a culture of respect, transparency, and continuous improvement in the protection of human rights.

#### *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.

#### *WHISTLEBLOWER POLICY*

Metergy is committed to conducting business with honesty and integrity and employees are expected to maintain high standards. Our Whistleblower Policy clearly sets out the expectations for reporting and other responsibilities, and outlines whistleblowing procedures to address how to raise a concern and maintain confidentiality. This policy further provides our expectations regarding remediation, external disclosures, and emphasizes our zero tolerance for retaliatory or malicious acts.

#### *VENDOR CODE OF CONDUCT*

In connection with any vendor engagement, employees are required to comply with Metergy's policies and procedures, including those in relation to anti-modern slavery. Our Vendor Code of Conduct sets out our expectations of vendors that provide goods or services to Metergy.

#### *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 behaviours are not tolerated; and (iii) how to report incidents following proper procedures. These actions reduce the risk that behaviours that are abusive, coercive, or indicative of modern slavery will occur in Metergy's workplace, and help us ensure that such behaviours are reported and escalated within our organization.

#### *ANTI-BRIBERY AND CORRUPTION POLICY*

This policy is designed to prevent financial crimes, such as payment of bribes or facilitation payments in furtherance of business (including bribes that may contribute to modern slavery).

Preventing the onboarding of those involved in financial crimes, identifying suspicious or criminal activity, and making reports to the relevant authorities, not only supports our fight against bribery and corruption, but also the fight against modern slavery by association.

Our Policy Framework is reviewed periodically and updated as necessary.

#### **b. Training**

To ensure ongoing awareness and compliance, all employees are required to review and attest to the Positive Work Environment Policy, the Code of Business Conduct and Ethics and the Human Rights and Anti-Modern Slavery Policy on an annual basis. This attestation process serves as both a reaffirmation of Metergy's values and a mechanism for reinforcing a culture of accountability and ethical conduct.

In 2025, we identified a platform with anti-modern slavery training program options for employees. We aim to roll out training to select Metergy employees in higher-risk roles by the end of 2026, with training for the broader team to follow. This is an important step in our commitment to raise awareness and provide appropriate training to all employees.

### c. Remediation

We have not found any evidence of modern slavery in our business or supply chain, and to our knowledge no circumstances have been identified that would require remediation. Accordingly, no remediation efforts have been taken to date. We will continue to assess our business and to use our leverage to address any issues that we discover.

### d. 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 behaviours. Issues relating to modern slavery and human trafficking 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. Metergy employees are made aware of the Hotline as part of onboarding and through our annual policy attestation.

## 7. MEASURE OF EFFECTIVENESS

Metergy acknowledges that modern slavery 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 modern slavery in our business and supply chains; and
- transparency through our disclosure obligations.

We monitor and assess the effectiveness of our modern slavery 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.

## 8. APPROVAL AND ATTESTATION

This Report was approved by Metergy’s board of directors on the 7th day of May, 2026, in accordance with Section 11(4)(a) of the Act

### Metergy Solutions Inc.



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Name: Mark Murski

Title: Director

Date:

I have the authority to bind Metergy Solutions Inc.