



Direct Energy  
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May 30, 2025

Ministry of Public Safety/Public Safety Canada  
269 Laurier Avenue West  
Ottawa ON K1A 0P8

Delivered by e-mail

**Modern Slavery Act Report of Direct Energy Marketing Limited**

**Introduction**

This report has been prepared by Direct Energy Marketing Limited, a corporation amalgamated under the *Business Corporations Act* (Ontario) (business number 5043872) ("**DEML**"), pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the "**Act**") and covers the reporting period for DEML's financial year ended December 31, 2024.

This report offers a summary of the measures DEML has implemented in the last year to manage the risks associated with forced labour and child labour across DEML's operations and supply chains.

**Structure, Activities and Supply Chain**

DEML is headquartered in Alberta, Canada and operates in the utilities industry providing electricity, natural gas and renewable solutions to consumer and business customers across Alberta. DEML is a wholly owned subsidiary of NRG Energy, Inc. ("**NRG**"), a US public company, and was acquired by NRG in 2021. DEML is not subject to reporting requirements under supply chain legislation in any other jurisdiction.

Less than 1% of DEML's total gas sales in Canada is imported by DEML. Generally, wholesale gas supply counterparties are treated by DEML and by NRG, and all their respective subsidiaries and affiliates, as transactional trading relationships, and not as supply-chain vendors. To the best of our knowledge and belief, market practice is generally consistent with such a view. As such, these transactional relationships have not been considered to fall within the scope of traditional supply chains. DEML nonetheless also considers and evaluates the risks associated with the nature of such trading partners, the locations and jurisdictions from which they operate as well as the governance and operational safeguards that they have in place.

For products other than gas, DEML sources these from suppliers located within Canada. All suppliers agree to adhere to NRG's fair employment practices outlined in NRG's Supplier Code of Conduct which includes complying with all applicable laws pertaining to working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor, and employment discrimination. Further, suppliers agree to respecting basic human rights of employees and confirm that all work must be voluntary and forced, involuntary prison labor, slavery or human trafficking is prohibited.

## **Policies and Due Diligence Processes**

While DEML does not have any due diligence procedures in place specifically addressing forced or child labour, suppliers of NRG and its subsidiaries, including DEML, must comply with NRG's Supplier Code of Conduct. Our Supplier Code of Conduct upholds our commitment to conducting business with safety and integrity in alignment with NRG's core values, including complying with laws prohibiting forced, compulsory and child labour and applies to all of our suppliers.

In addition, NRG's Code of Conduct applies to all employees of DEML and compliance with the Code of Conduct is mandatory. Employees are expected to be familiar with and comply with the Code of Conduct in the performance of their duties. The Code of Conduct sets out the company's commitment to integrity and fair dealings and supports our strong culture of compliance. The Code includes sections on the protection of human rights, including following ethical sourcing practices.

## **Forced Labour & Child Labour Risks & Management / Training / Assessing Effectiveness**

Within DEML's non-traditional supply chain as described above, our operations based in Canada pose a low risk of child labour and forced labour as a result of the applicable federal and provincial legal regulations and high level of compliance within our company. DEML provides employee training on its Code of Conduct and operational compliance matters. DEML does not offer any other specific training related to risks of forced labour and child labour. No actions have been taken to assess effectiveness in preventing and reducing risks of forced labour and child labour.

## **Remediation Measures**

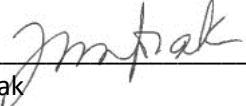
During the previous financial year, no instances of forced labour or child labour have been detected within our operations or supply chain. Consequently, no remediation measures have been taken, and no measures were taken to remediate loss of income. However, should any instances of forced labour or child labour arise, we will evaluate and implement suitable remedial strategies.

## **Approval and Attestation**

This report was approved pursuant to subsection 11(4)(a) of the Act by the Board of Directors of DEML.

I have the authority to bind Direct Energy Marketing Limited.

*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 the entity. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.*

  
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Tanis Kozak  
President, Direct Energy Marketing Limited

May 30, 2025