Introduction

Hudson Energy recognises that slavery and bribery are a global issue existing in every region of the world and in every type of industry and economy. No company’s operations can be considered immune from injustices in this form. This is one of the reasons why Hudson Energy operates a zero-tolerance approach to slavery and bribery in any form within our operations and supply chain.

This Statement sets out the steps that we have taken to prevent slavery and bribery in our business and supply chains during the year ending 31 March 2019.

Our business
Hudson Energy brings renewable energy to homes and businesses. Our business in the United Kingdom is organised into two main businesses:

- **Hudson Energy**: Specialising in business energy products, Hudson Energy is a business-to-business supplier of electric power and natural gas commodities.
- **Green Star Energy**: Specialising in consumer energy products, Green Star Energy is a residential supplier of electricity and natural gas commodities.

Hudson Energy and Green Star Energy are subsidiaries of Just Energy Group Inc., a publicly traded company consisting of eight brands and serving almost 2 million customers across North America. Just Energy’s backing provides us with the stability of dealing with a global operation and our team with a wealth of experience from which to draw.

Our supply chain

Our supply chain includes:
- **Energy Commodity**: generators of electricity at power plants or the producers of natural gas throughout Europe.
- **Network services**: including the transmission or moving of energy in high volumes from their sources toward end users and the distribution, supplying or metering of energy to end users’ premises.
- **Retail services**: billing and managing price risk for end users.
Due diligence

Our reputation is built on our values as a company, and those values must be practiced by our suppliers to demonstrate a collective commitment to acting with integrity throughout our organisation. We pride ourselves on our reputation for acting fairly and ethically wherever we do business.

Hudson Energy’s internal policies include our Code of Conduct where we ask our business partners to confirm that:

• they will not tolerate or condone modern slavery or corruption in any form;
• they understand the applicable laws and punishments prescribed by those laws for non-compliance;
• all of the work they do in their commercial relationship with us will be in adherence to those laws; and
• they understand that we will take very seriously any non-compliance with those applicable laws on their part and that consequences could include termination of the commercial business and contract(s) with that supplier.

Suppliers are asked to show their commitment to observing these laws by signing that Code of Conduct in order to become an approved supplier. The provisions of the Code are embedded into our default supplier contract. Suppliers whom do not sign that contract are presented with the Code as a separate document to sign.

From time to time, we may determine that certain suppliers who are critical business partners without whom supply of commodity to our customers would be interrupted are low risk and therefore can proceed to become or remain a supplier to Hudson Energy. These determinations are made after careful legal and regulatory review on the board level with the head of that function and approval will not be granted until a director has approved the presented business case to clear that supplier.

Control

Our finance and legal departments conduct regular audits to ensure that only suppliers who have been cleared in the due diligence processes are run through our books.

We also operate a Whistleblowing Policy to encourage employees, suppliers and any other persons to report any wrongdoing or breaches of law. All reports will be fully investigated, and the appropriate remedial actions will be taken.

Further steps to prevent slavery and corruption in our supply chain

Hudson Energy understands that compliance is not a static declaration and is committed to continuing our efforts to mitigating the risk of exposing our operations and supply chain to slavery and corruption.
The heads of function in Hudson Energy are responsible for ensuring that their function (including their teams and suppliers) operate in adherence to the Code of Conduct. We have confirmed their recognition of this responsibility over their area by asking them to sign this Statement to confirm their dedication to ensuring that our supply chain operates free of slavery and corruption to provide ethical and renewable energy to our customers’ homes and businesses.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement. On behalf of the Board of Directors for Hudson Energy, I am proud to present our Statement for the financial year ending in March 2019.

[Signature]

Paul Hetlings
UK CEO
June 2019