

Conflict Minerals Policy Statement

We are subject to U.S. Securities and Exchange Commission (the “SEC”) disclosure and other requirements related to conflict minerals (gold, tin, tantalum, and tungsten, collectively the “3TG” minerals) that may have originated in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”). The SEC rules require publicly-traded companies to report annually on certain matters with respect to conflict minerals that are “necessary to the functionality or production” of products that the company manufactures or contracts to manufacture.

We support the goal of ending violent conflict in the Covered Countries, which has been partially financed by the exploitation and trade of 3TG minerals by armed groups in the region.

Energy Focus does not procure 3TG minerals directly from mines or smelters. However, certain of our lighting products include small amounts of 3TG minerals in electrical components that we procure from our suppliers. Therefore, we must rely on information provided by those suppliers with respect to the origins of the 3TG included in these components. We will work with our suppliers to verify to the extent practicable that the 3TG minerals included in the components that we procure are not sourced in a manner that directly or indirectly finances or benefits armed groups in the Covered Countries. This process will include obtaining information, via the standard EICC/GeSi Conflict Minerals Reporting Template and other correspondence, concerning the origin of the 3TG minerals in the products that our suppliers sell to us.

Energy Focus is committed to complying with the SEC’s due diligence and disclosure obligations with respect to conflict minerals, and will endeavor to replace any supplier that does not demonstrate to our satisfaction that the components provided to us are “conflict-free” or that does not reasonably cooperate with our due diligence efforts.