

Greenergy Modern Slavery Statement 2023

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This Statement has been published in accordance with the UK's Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. The statement is published by the Greenergy Group for which Greenergy Group Holdings Limited ("GGHL") acts as a parent company. The Statement reflects Greenergy Group's approach towards the risk of modern slavery within its business and supply chain and relates to the financial year ending 31 December 2023.

This Statement covers all companies within the Greenergy Group, in particular entities that under the UK's Modern Slavery Act 2015 are mandated to publish an annual Modern Slavery Statement, being Greenergy Fuels Holdings Limited, Greenergy International Limited, Greenergy Fuels Limited, Greenergy Flexigrid Limited and Inver Energy (UK) Limited. This statement also covers the entity that, under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, is mandated to publish a Report on annual basis, being Greenergy Fuels Canada Inc. / Carburants Greenergy du Canada Inc. ("GFC").

This statement has been approved (i) on behalf of the Greenergy Group by GGHL's Board on 23 April 2024, and (ii) on behalf of GFC by its Board on 30 May 2024.

1. Introduction

At Greenergy, we continually strive to conduct our business respectfully, ethically and honestly. Doing the right thing and in full compliance with the law is not just a policy at Greenergy, it is embedded in our culture and values, and underpins every interaction we have with stakeholders, including colleagues, customers, suppliers and the communities in which we operate.



We do this by:

Respect	Delivering change through innovation: developing and driving renewable projects
Ownership	Evolving our supply chain: maintaining quality and reliable supply
Care	Retaining strong customer relationships: honesty and transparency in how we work
Integrity	Acting responsibly and being accountable: doing no harm to people or place.



Modern slavery is a term used to describe exploitation of a person for the gain of someone else through violence, coercion, deception or threats, and often interlinks with other illegal activities. Modern slavery can take many forms, including but not limited to human trafficking, labour exploitation, child labour, financial exploitation and forced criminality. All these forms of exploitation have lasting effects on impacted individuals and communities around the world.

Greenergy has a zero-tolerance approach against any form of modern slavery and supports the fight against it. We acknowledge that this issue affects all industries, and that everyone needs to play an active part to prevent, mitigate and, if required, remediate the risks of modern slavery within operations and supply chains.

This statement outlines our approach to understanding and minimising the potential risk of modern slavery within our business, and across our value chain.

This includes ensuring that our business is carried out, with the following aims:

1. Having a zero-tolerance approach on slavery and human trafficking, including child and forced labour;
2. Combating and eradicating any form of harassment, bullying and abuse in our workplace; and
3. Combating and eradicating any form of discrimination in our employment practices and workplace.

This Statement describes the different steps taken by Greenergy to identify, assess and address the risks associated with modern slavery and human trafficking during the period between 1 January 2023 and 31 December 2023.

2. Greenergy's business and supply chain¹

What we do

Greenergy's mission is to deliver long-term value for our stakeholders through the production and distribution of waste-derived renewable transportation fuels.

Our unique global supply chain enables us to source, produce and deliver waste-derived renewable and transportation fuels in the most efficient way. Our supply chains comprise of domestic and international rail, international shipping or a combination of both.

The flexibility and optionality in our purchasing, ensures we are able to respond quickly to market requirements.

KEY

- Marketing and supply
- Retail
- Biodiesel plant
- IT support
- Feedstock sourcing and aggregation



¹ The description of Greenergy's business and supply chain in this report is a description of the collective businesses and supply chains of all Greenergy Group entities listed in this report. Notably, GFC's business is primarily that of a fuel marketer and supplier with renewable fuel blending capabilities; while GFC blends fuels acquired from other suppliers, it does not otherwise produce or manufacture fuels (including waste-to-biodiesel manufacturing), source or collect waste oil, feedstocks or UCOs, source fuel from first tier suppliers outside of Canada or the United States of America, supply fuel outside of Canada or the United States of America, or ship product by vessel. Any mention of the foregoing activities in this report does not refer to any such activities of GFC.

Marketing and supply

Greenergy are an international manufacturer, supplier and retailer of waste-derived renewable and transportation fuels. We supply fuel to various segments including oil companies, supermarkets, independently owned forecourts, commercial and marine users. Greenergy also manages the fuel supply chain for many of our customers, taking care of stock management and delivery as well as fuel supply.

Retail

In the UK, Ireland and Canada we supply independent retailers, providing reliable supply of quality fuels. We also own and operate our own forecourts in Ireland and historically in Canada² and offer independent retailers reliable, competitive supply and a compelling convenience offer

Biodiesel plants

We manufacture waste-based biodiesel at our plants in the UK and the Netherlands. We source fuel products and feedstocks globally. We continue to invest in our renewables business, expanding our local waste-to-biodiesel manufacturing capability to support our customers through the energy transition.

Feedstock sourcing and aggregation

We source the products and feedstocks globally. We have built long-term trading relationships with waste oil collectors globally, and have also invested in aggregation and UCO collection.

² Greenergy completed the sale of their Canadian retail fuel business to Global Fuels Inc. as of 13 November 2023. GFC continues to serve independent third-party dealers under proprietary Greenergy brands – Inver and Breakaway

3. Policies

Our core policies relevant to modern slavery are:

- The Code of business conduct and ethics;
- The Business conduct and ethics principles for business partners;
- The Screening processes in place for each jurisdiction;
- The Environmental, Social and Governance (ESG) Policy;
- The Process Integrity (PI) policy statement;
- The Grievance policy (specific for each jurisdiction);
- The Know Your Business Partner (“KYB”) processes; and
- The Anti-harassment and bullying processes.

Code of business conduct and ethics

Greenergy’s Code of business conduct and ethics is applicable to all employees of the Greenergy Group and sets out how we conduct ourselves and provides a framework to guide our actions. This includes carrying out our activities in a manner that respects and supports the protection of human rights through striving for:

1. The elimination of discrimination in employment;
2. The eradication of harassment and physical or mental abuse in the workplace; and
3. The promotion of a positive work environment through Greenergy’s Respect Agenda.

Business conduct and ethics principles for business partners

Greenergy’s business conduct and ethics principles for business partners (the “Business Partners Principles”) sets out principles and expectations for all of our business partners. These include: anti-bribery and corruption, health safety and environment, human rights, modern slavery and human trafficking, as well as expected reporting requirements.

Screening processes

Suitable screening processes are in place to meet local jurisdiction requirements, to conduct background checks on existing and prospective Greenergy employees. Checks also include verification of identify and right to work.

Environment, Social and Governance (ESG) Policy

Greenergy's ESG Policy sets out Greenergy's ESG principles, including our commitment to take practical steps to uphold and protect human and labour rights in our business. This ensures alignment with one of our core principles of causing no harm to people and place.

Process Integrity (PI) Policy Statement

Greenergy's PI Policy statement comprises Personal Safety, Process Safety, Health, Environment, Quality (SHEQ). This policy sets out Greenergy's responsibility to safeguard the safety, health, welfare, and environment of those who work for the company or come into contact with our activities, preventing injury, ill health and harm to the environment.

Grievance policy and access to remedy

Grievance policies, specific for each jurisdiction, are in place to allow employees to raise a complaint and seek remedy internally, escalating issues to managers, and involving local HR as appropriate.

Greenergy's independent whistleblowers hotline is available 24/7, in multiple languages, to allow employees a further route to reporting.

Know Your Business Partner ("KYB")

Greenergy's KYB process is mandatory for onboarding new suppliers and customers to purchase goods or services or provide them. The KYB process includes a risk assessment and a proportionate due diligence protocol to apply to the prospective business partner with specific modern slavery considerations.

Anti-harassment and bullying

We have a duty to provide our workers with a safe place and system of work. This includes a workplace free from harassment, intimidation, and bullying. We have processes in place, appropriate for each jurisdiction in which we operate, that are designed to eliminate harassment and bullying at work for all employees and to provide protection for employees who consider that they are being harassed or bullied.

4. Risk management of modern slavery

Greenergy strives to mitigate all human rights risks that could be present in our supply chain, and in order to do so we continuously assess our own supply chain to further develop mitigations according to each risk.

In the past year, we continued to apply the Business Partners Principles in our due diligence practices to ascertain that our suppliers are aligned with our expectations from the start of the relationship. We also include, as a standard, a set of modern slavery specific clauses in new contracts and contracts due for renewal, targeting specific risks and setting clear expectations for our suppliers. Suppliers are also monitored on an ongoing basis, so that any allegation around modern slavery or human exploitation is promptly reviewed and mitigations are put in place accordingly.

Greenergy acknowledges that country risk is a key element in assessing any modern slavery impact on the supply chain. As part of our general assessment based on specific indices around modern slavery, Greenergy has a clear policy of not trading with specific countries where other considerations are critical, such as trade sanctions.

Greenergy recognises that no country or industry is immune from modern slavery. Having undertaken an assessment of our operations, we have identified that our renewables business is the most vulnerable to the risk of forced labour, as our feedstock sourcing involves a high volume of counterparties in different countries around the world, each operating under different legislation. When engaging new suppliers and in maintaining relationships with existing suppliers, Greenergy recognises, considers, and carefully weighs the risks associated with specific countries and industry sectors connected with the sourced product.

To date, Greenergy has not become aware of any forced labour or child labour in its activities and supply chains. As a result, Greenergy has not taken any remedial measures, or any remedial measures with respect to loss of income as a result of efforts to reduce forced and child labour.



Case study

Another aspect of our supply chain we identified as having a tangible risk, concerns the vessels we use to ship our feedstocks and products, where the crew may be exposed to human rights violations and forced labour.

Crew safety and welfare on the vessels we use to ship our feedstocks and products is an area of focus for Greenergy which is specifically addressed in our risk identification and due diligence processes. To better understand the management and performance in these areas on the vessels we could potentially use, we utilise the due diligence platform, RightShip. The platform undertakes checks which include the right to safe and secure working conditions, and fair terms of employment. If a discrepancy is identified and proven, Greenergy will not hire the vessel until the situation is properly remediated.

With support from the Sustainable Shipping Initiative (SSI) and the Institute for Human Rights & Business (IHRB), RightShip developed and rolled out a Crew Welfare Self-Assessment Tool in 2021. The tool aims to help shipowners, managers and operators understand their responsibilities relating to crew welfare, and to find areas for improvement. Use of the self-assessment tool by the shipowners and operators allows Greenergy to understand how crew welfare is being addressed on the vessels, and how they are addressing any potential areas for improvement prior to choosing to work with them.

5. Due diligence practices

Greenergy expects all its business partners to adhere to the same principles of zero tolerance against human exploitation. As part of this, suppliers specifically are required to confirm they have a set of similar standards in place for their operations as those detailed in Greenergy's Business Partner Principles.

Greenergy's KYB (Know Your Business Partner) Team monitors the onboarding process of all business partners with a special focus area on modern slavery risks. With ongoing monitoring, if any violation concerning human rights emerges for a specific business partner, the relationship is re-assessed. Where appropriate, specific mitigation strategies are implemented, or in the most severe cases, the relationship is terminated.

Following the recruitment process, all successful candidates undergo a screening process that includes the verification of the candidate's identity and right to work.

Greenergy Group entities involved in the production and manufacturing of biofuels hold International Sustainability and Carbon Certification (ISCC) ensuring sustainability throughout our biofuel supply chain, including on all feedstocks. The ISCC principles include checks on ecological sustainability, social sustainability (including safe working conditions and compliance with human, labour and land rights), compliance with laws and international treaties, monitoring of GHG emissions and good management practices.

See more detail here; Objectives › ISCC System (iscc-system.org)

Under ISCC, all products bought and sold are required to have a proof of sustainability document, which outlines the origin of the product and the certification of the supplier.

6. Training and Key Performance Indicators

As part of the induction process at Greenergy for managers and those in specific areas such as procurement, mandatory new starter training highlights the risk of modern slavery as it relates to Greenergy's operations and supply chains. This ensures employees involved in the procurement of goods and recruitment better understand the impact and risks associated with modern slavery, and that they are able to identify applicable issues and escalate them as appropriate.

The training covers the definition of modern slavery, including different forms such as child labour. It also highlights specific risks that are material for Greenergy's business and supply chain. To pass the training module, participants must achieve a minimum score on the final test.

To further increase the understanding of modern slavery across the business, in 2023, Greenergy implemented this training for all line managers including those working in our retail stores. The training was extended to these employees as it recognised the high turnover associated within the retail business and the importance for managers on site to be equipped with the information required to recognise any red flags associated with modern slavery.

In order to assess our effectiveness in ensuring that forced labour and child labour are not being used in our activities and supply chains, we track and monitor completion by our employees of our training modules related to modern slavery. We are also committed to tracking and monitoring the number of modern slavery-related grievances, tips and reporting received through our internal policies and whistleblower hotline, though note that no such grievances, tips or reports have been received to date.

2023 Training summary

101 employees across the Greenergy Group completed the training in 2023, which was 96% of the employees who were assigned the training.

7. Future plans

We will continue to assess our operations and markets to identify any emerging risks of modern slavery, and to ensure our management of the same remains appropriate. Dialogue with our stakeholders, such as suppliers and customers is especially critical, and these learnings will drive our continuous improvement.

Internal training

Training is updated and reviewed on a regular basis, and will continue to be implemented for new starters, with existing staff undertaking refresher training every two years, with the next refreshment training scheduled for 2024. Our whistleblowing procedure will also be updated in 2024 as new guidelines are introduced, and will be open to external parties. This will allow anyone who feels a violation is occurring to report it confidentially.

8. Review

The statement reflects Greenergy Group’s approach towards the risk of modern slavery within its business and supply chain and relates to the financial year ending 31 December 2023.

This Statement covers all companies within the Greenergy Group, for which Greenergy Group Holdings Limited (“GGHL”) act as a parent company, in particular entities that under the UK’s Modern Slavery Act 2015 are mandated to publish an annual Modern Slavery Statement:

- GREENERGY FUELS HOLDINGS LIMITED
- GREENERGY FLEXIGRID LIMITED
- GREENERGY INTERNATIONAL LIMITED
- INVER UK LIMITED
- GREENERGY FUELS LIMITED

On behalf of GGHL



Name: Christian Flach

Title: Chief Executive Officer

Date: 30 May 2024

9. Attestation (as relates to Canada)

This Report was approved pursuant to subparagraph 11(4)(a) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”) by the Board of Directors of Greenergy Fuels Canada Inc./Carburants Greenergy du Canada Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof I, the undersigned, attest that I have reviewed the information contained in the report for the entity specified below. 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 specified above.

I make the above attestation in my capacity as a director of the Board of Directors of Greenergy Fuels Canada Inc./Carburants Greenergy du Canada Inc., for and on behalf of Greenergy Fuels Canada Inc./Carburants Greenergy du Canada Inc.

I have the authority to bind Greenergy Fuels Canada Inc./Carburants Greenergy du Canada Inc.

GREENERGY FUELS CANADA INC. /
CARBURANTS GREENERGY DU CANADA INC.



Name: Paul Bateson

Title: Director

Date: 30 May 2024

Entities covered by the
UK's Modern Slavery Act 2015

Greenergy Fuels Holdings Limited:

registration number: 07318726
198 High Holborn, London, WC1V 7BD

Greenergy International Limited:

registration number: 02809935
198 High Holborn, London, WC1V 7BD

Greenergy Fuels Limited:

registration number: 04058825
198 High Holborn, London, WC1V 7BD

Greenergy Flexigrid Limited:

registration number: 07581532
198 High Holborn, London, WC1V 7BD

Inver Energy (UK) Limited:

registration number: 05706050
198 High Holborn, London, WC1V 7BD

Entity covered by Canada's
fighting against Forced Labour
and Child Labour in Supply
Chain Act

Greenergy Fuels Canada Inc. /

Carburants Greenergy du Canada Inc.:

registration number: 1000401952
800-141 Adelaide St. W. Toronto, ON, M5H 3L5