

Greenergy Fuels Holdings Limited Anti-Slavery and Human Trafficking Statement

The statement is published by the Greenergy group for which Greenergy Fuels Holdings Limited (“GFHL”) acts as a parent company. The statement reflects Greenergy’s approach towards the risk of modern slavery within its business and supply chain and refers to the financial year ending 31 December 2018.

Our Business and Supply Chain

We have grown to become the leading supplier of road fuels in the UK and Ireland. We are now building on our UK experience to grow internationally. Currently, Greenergy has 12 offices in 10 different countries. We have a growing number of supply locations that we supply from in eastern Canada and Brazil. We also operate two biodiesel manufacturing facilities in the UK, with a third facility in the Netherlands due to become operational in 2019.

Our business encompasses a variety of industries, including logistics, the acquisition of fuel components and manufacturing. Our supply chain extends across the UK, Europe, South America, USA, Europe, Asia, Australia and the Middle East.



Our Values

Greenergy strongly opposes any form of slavery and human trafficking.

The following requirements apply in our own operations and extend to our suppliers:

- To comply with all applicable legislation in the jurisdiction in which business is conducted;
- To adhere to good employment practices; and
- To take practical steps to verify whether their supply chains are free from slavery and human trafficking

Greenenergy's core values are:

Respect - Everybody in Greenenergy is doing an important and worthwhile job. People need to and should be respected, supported, feel valued, happy and safe coming to work.

Ownership - We all own our jobs. We know them best, we aspire to improve, develop them and we should fix things when they are wrong.

Care - We should all care about others, care about how our jobs link to other jobs and understand how the whole system works.

Knowledge - We should all have the knowledge and skills to do what we need to do. We should not do things we don't understand and be confident to stop and ask if we don't know. There is no blame or criticism for stopping, it is demonstrating Respect, Ownership and Care!

Greenenergy is committed to promoting equal opportunities including recruitment, employment, training and promotion. It is the Greenenergy's policy not to discriminate against its workers. Greenenergy protects its employees' rights to a working environment free from harassment and intimidation. Our anti-harassment and bullying policy is designed to prevent harassment and bullying at work and to provide protection for employees who consider that they are being harassed or bullied.

Prevention

Greenenergy has an Ethics Committee in place. The Ethics Committee is responsible for assisting the Greenenergy Fuels Holdings Limited's Board in the embedding and oversight of values, the ethical policy framework and monitoring the overall ethical health of the firm and compliance with legal, professional and ethical standards. Matters concerning ethical behaviour are subject to the Committee's discussion.

Greenenergy's Code of Business Conduct and Ethics strictly forbids any illegal or unethical conduct. The Code of Conduct is one of the most important documents within Greenenergy. Its form and expectations are reiterated and communicated to all Greenenergy employees annually. If any employee becomes aware of any unethical or illegal conduct, they are expected to report it directly to a line manager or to the anonymous Greenenergy Business Conduct and Ethics Helpline. Greenenergy, through its internal campaigns, encourages and supports all whistle blowers.

In 2018, as part of our program of continuous improvements we have further developed and enhanced Greenenergy due diligence process with an aim of vetting new suppliers to check and verify that they are not involved in any criminal investigations, including any violation of human rights.

As part of this program, Greenenergy also requires direct contact with Greenenergy's suppliers in order to assess their approach to human trafficking and slavery. The outcomes of this review will be published in 2019.

Promoting the objectives of the Modern Slavery legislation, we have contract clauses, which require suppliers to confirm their compliance with all applicable legislation. Going forward, these new clauses will be introduced at every opportunity, including new contracts or as a part of contracts renewals. Prior to introduction, across our business generally, we insist on open and honest communication with our suppliers. All Greenenergy's suppliers are expected to comply with all applicable laws and regulations, including the respect for the human rights.

Review

This statement has been approved on behalf of the Group of Greenergy companies, by the Committee of the GFHL's Board, having responsibility for the statement and will be reviewed each year in accordance with the Modern Slavery Act 2015.

Greenergy Fuels Holdings Limited Anti-Slavery and Human Trafficking Statement covers all entities from Greenergy group, in particular entities, which under Modern Slavery Act 2015 are mandated to publish an annual Modern Slavery Statement:

Greenergy Fuels Holdings Limited

Greenergy International Limited

Greenergy Fuels Limited

Greenergy Flexigrid Limited

All standards apply to all Greenergy entities.

A handwritten signature in black ink, appearing to read 'Richard Clifton', followed by a period.

Richard Clifton
Company Secretary
03rd April 2019