

Greenergy Group Holdings Limited Anti-Slavery and Human Trafficking Statement

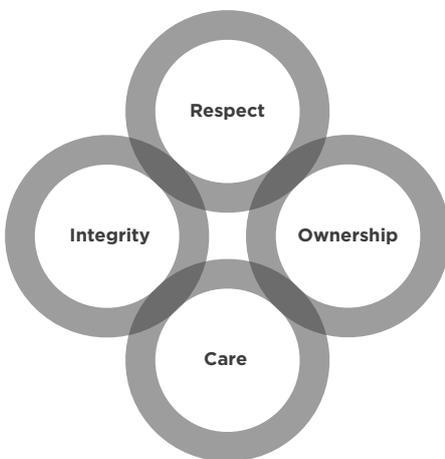
The statement is published by the Greenergy group for which Greenergy Group Holdings Limited (“GGHL”) acts as a parent company. The statement reflects Greenergy Group’s approach towards the risk of modern slavery within its business and supply chain and refers to the financial year ending 31 December 2021.



Our values and policies

At Greenergy, we continually strive to conduct our business respectfully, ethically and honestly. Doing the right thing and in full compliance with the laws is not just a policy at Greenergy; it is embedded in our culture and values, extending to all our relationships with different stakeholders.

Greenergy's values are considered to be our strength and foundation, and are best summarised as Respect, Ownership, Care and Integrity.



These values underpin every interaction we have, whether with colleagues, customers, suppliers and the communities in which we operate. Greenergy ensures this commitment and values are upheld with all our business partners in particular by sharing with them our [“Business conduct and ethics principles for business partners”](#). where we clearly communicate our expectations, including our commitment to oppose slavery and human trafficking in any form. The requirements listed below apply to our own operations but are also extended to our suppliers:

- » compliance with all applicable legislation in the jurisdiction in which business is conducted;
- » Adherence to good employment practices; and
- » endeavour to take practical steps to verify whether the supply chains are free from slavery and human trafficking.

Greenergy is committed to promoting equal opportunities across all its business activities including (but not limited to) recruitment and selection, employment, training and promotions. As a policy, Greenergy does not discriminate against its workers and encourages diversity and inclusion; the Diversity and Inclusion group set up in 2020 and continued to work throughout 2021 to identify the main areas

of focus to implement an appropriate strategy and improve our current practices further. Greenergy protects its employees' rights to a working environment free from harassment and intimidation with our anti-harassment and bullying policy, designed to prevent any intimidating behaviour at work and to provide protection for employees who consider that they are being harassed or bullied. Our commitment to a safe and healthy workforce has remained a priority through the continued disruption caused by the COVID-19 pandemic in 2021, where Greenergy proactively ensured the safety and wellbeing of all its employees by arranging remote working for the office staff wherever possible and increasing health and safety measures for the essential workers who were required to work on the company's premises, promoting a mental health awareness programme to assist staff in coping with the challenging circumstances and the disruption. When returning to office premises was possible again, Greenergy ensured all its employees were able to attend their respective locations safely implementing an appropriate booking and testing system, allowing employees to return to work in the safest manner possible.

Greenergy's Code of Business Conduct and Ethics remains at the core of all our policies and is reviewed annually by the company's Ethics Committee to make sure it reflects our expectations and values consistently and comprehensively. To ensure a better understanding, the Code is available in different local languages and published on the Company's Intranet, where all employees can access it at any given time. The most updated version is also available at our public website for our stakeholders. Our employees know that if they become aware of any unethical or illegal behaviour, they are expected to report it. Any staff reporting an issue can do so directly to a line manager, or, to protect those who wish to remain anonymous, through the whistleblower's hotline, which is available the accessible to all our employees. The helpline is available in different languages and is active 24/7, to ensure each employee can feel comfortable when calling it. Whistleblowers are encouraged and supported through internal campaigns without fear of retribution or retaliation. Greenergy is conscious that, in the environment brought by the COVID-19 pandemic, access to managers might not be as immediate as before and the whistleblowers' helpline has become an even more important tool to ensure employees could still feel comfortable reporting any wrongdoings in good faith.

Due Diligence in the supply chain

Greenergy's has a dedicated Team looking after the on-boarding process for all business partners, with specific care to understanding the risks associated with each new business relationship. All information captured on the prospective business partner is thoroughly scrutinised. For cases where serious issues are discovered, a final report is sent to the company's Risk Committee for further consideration. This includes information on Modern Slavery allegations or investigations, which are taken very seriously by Greenergy. The Team periodically refreshes due diligence on the existing business partners, ensuring any potential issue is captured and assessed as soon as possible. Misalignments are reported to the business in a timely fashion. Specific queries have been added on the suppliers' onboarding forms to understand their own practices and procedures around Modern Slavery and have them confirm that they have equivalent standards as the ones set by Greenergy's "[Business conduct and ethics principles for business partners](#)". If the equivalence request is not explicitly confirmed, the supplier fails the onboarding process. This method encourages an open dialogue and gathering of relevant information within the supply chain to ensure our suppliers are as committed as Greenergy for a supply chain void of human exploitation in any form. A dedicated set of contractual clauses is inserted into new contracts and contracts due for a renewal with our existing counterparties. It is expected that the zero tolerance approach on Human Trafficking, Modern Slavery and any other illegal practice is governing the relationship with the business partner from the start, embedded in the business relationship.

Prevention and monitoring

Greenergy's Ethics Committee assists Greenergy Group Holdings Limited's Board in ensuring the company values are understood and respected, overseeing the ethical policy framework and monitoring the ethical standards to make sure the firm is compliant from a legal, professional, and ethical perspective. The Ethics Committee is invested and committed to ensure the ethical standards are met internally and externally.

A training module on Modern Slavery was developed and is available in three languages and is being uploaded on Greenergy's training platform, mandatory for all relevant staff to enhance awareness and understanding of what constitutes Modern Slavery and which forms it can take, and what to do if a potential red flag is identified.

Review

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

This Statement covers all companies within Greenergy group, in particular entities that under the 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

Inver UK Limited



Richard Clifton

Group General Counsel

1 July 2022