

Greenergy Modern Slavery Statement 2024

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 Limited (GGL) acts as a parent company. The Statement reflects Greenergy Group's approach towards the risk of modern slavery within its business and supply chain.

This Statement covers all companies within the Greenergy Group, in particular entities that under the UK's Modern Slavery Act are mandated to publish an annual Modern Slavery Statement, being Greenergy Fuels Holdings Limited, Greenergy International Limited, Greenergy Fuels Limited, and Greenergy Flexigrid Limited for the financial year ending 31 December 2024. Greenergy was acquired by Trafigura Group Pte. Ltd. on 31 July 2024.

This Statement also covers Greenergy Fuels Canada Inc. / Carburants Greenergy du Canada Inc. (GFC) being the entity within the Greenergy Group that is mandated to publish a Report on an annual basis under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In accordance with Canada's Income Tax Act, GFC had a deemed year-end upon completion of the acquisition and elected to change its financial year end to September 30. In order to ensure no gaps or overlaps in its reporting, this Statement, as relates to GFC, covers each of GFC's previous two compressed financial years, being 1 January 2024 to 31 July 2024 and 1 August 2024 to 30 September 2024 (collectively, the GFC reporting period).

This Statement has been approved (i) on behalf of the Greenergy Group by GGL's Board of Directors on 28 May 2025, and (ii) on behalf of GFC by its Board of Directors on 29 May 2025.

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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 the Greenergy way.

The Greenergy way reflects who we are, what we stand for and what we want to achieve as a business. We deliver safe, efficient and reliable fuel solutions for our customers and we aim to be a leading transportation fuel supplier, by integrating traditional and renewable energy solutions.

Our values underpin every interaction we have with stakeholders, including colleagues, customers, suppliers and the communities in which we operate.



The Greenergy way

Delivering safe, efficient and reliable fuel solutions for our customers.

We aim to be a leading transportation fuel supplier, by integrating traditional and renewable energy solutions.

We live by our values of respect, ownership, care and integrity. Our interactions with colleagues, customers, suppliers and our communities are all built on the foundation of our values.



1. Introduction continued

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 2024 and 31 December 2024, and in respect of GFC, during the GFC reporting period.

2. About Greenergy¹

Greenergy strives to deliver safe, efficient and reliable fuel solutions for our customers. We aim to be a leading transportation fuel supplier, integrating traditional and renewable energy solutions that support our customers as they navigate the energy transition.

What we do

Our unique global supply chain enables us to source, produce and deliver traditional and renewable fuel solutions reliably and efficiently.

Global origination

We source low cost products globally. The flexibility and optionality in our purchasing ensures we are able to respond quickly to market requirements.

Renewable fuels

We continue to invest in our renewable fuels business, expanding our local waste-to-biodiesel manufacturing capability to support our customers through the energy transition.

Customer sales

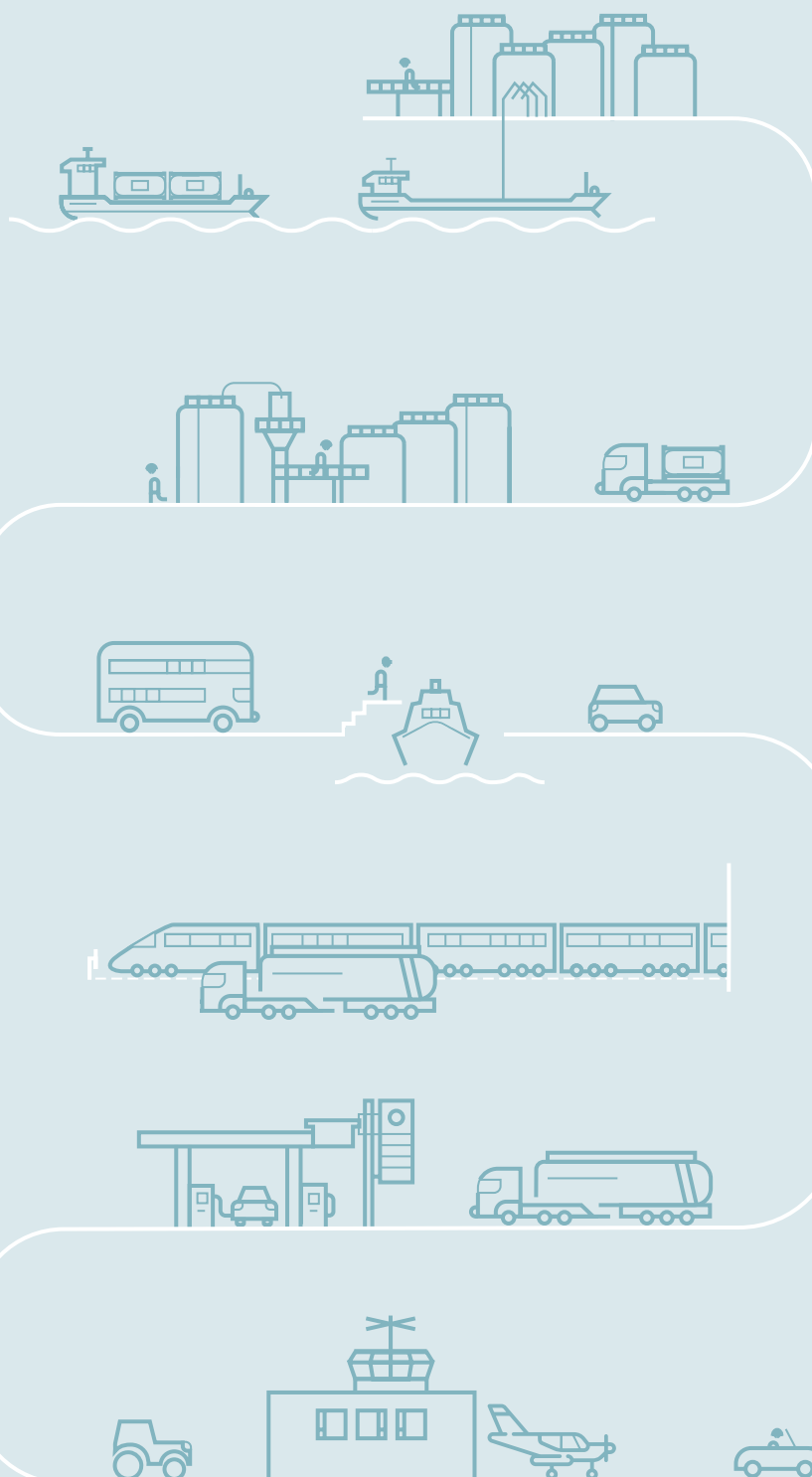
We supply fuel to various segments, such as road, aviation and marine. Our customers include oil companies, supermarkets, independently owned forecourts, commercial, aviation and marine users.

Logistics

We manage the fuel supply chain for many of our customers, taking care of stock management, delivery, logistics and site inventory management.

Retail

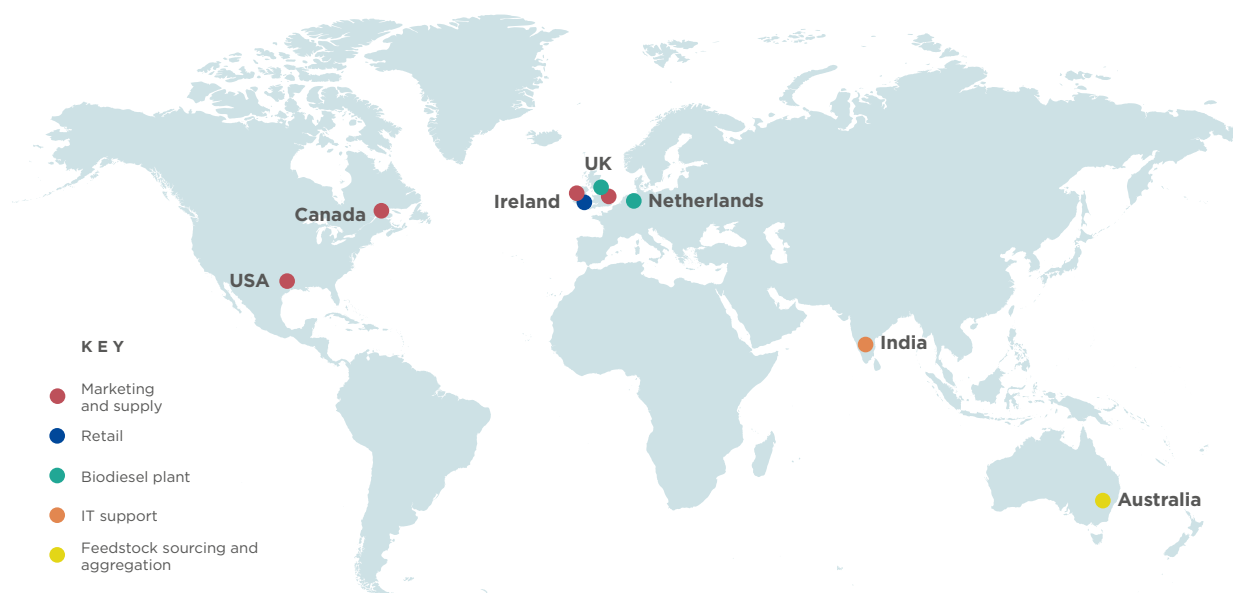
We own and operate our own forecourts across Ireland and supply independent retailers in the UK, Ireland and Canada.



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. For details specific to GFC's business, refer to the Canada section within Greenergy's operations by region and supply chain on page 6.

2. About Greenergy continued

Greenergy's operations by region and supply chain²



UK and Ireland

Greenergy supplies and distributes transportation fuels, including renewable fuels, across the UK and Ireland. 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 in the UK, as well as delivery and fuel supply in the UK and Ireland.

As a leading European biodiesel manufacturer, we manufacture waste-based biodiesel at our plants in the UK and the Netherlands. We source fuel products and feedstocks globally and have built long term trading relationships with waste oil collectors globally and have also invested in aggregation and UCO collection in Australia.

We own and operate our own forecourts in Ireland, in addition to supplying independent retailers in the UK and Ireland, providing reliable supply of quality fuels.

Canada

In Canada, GFC operates as a fuel marketer and supplier with renewable fuel blending capabilities. It also manages delivery on behalf of many of its customers by contracting directly with third party carriers. While GFC blends fuels acquired from other suppliers, it does not otherwise produce or manufacture fuels, source feedstock, or manage its customers' stock or inventory. GFC does not own any fixed assets outside of Canada.

² In connection with the acquisition, Greenergy disposed of non-core assets, including its operations in Brazil, Singapore and the Middle East.

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 identity and right to work.

3. Policies continued

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.

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 helpline 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 they are being harassed or bullied.

4. Risk management of modern slavery

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

We have 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 seek to 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 renewable fuels 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.

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 conduct and ethics principles for business partners.

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 collection, production, manufacturing and supply of biofuels are certified, ensuring sustainability throughout our biofuel supply chain³. The certification includes 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.

As part of this certification, 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.

³ As GFC does not perform all these activities, it does not hold this certification.

6. Training and Key Performance Indicators

As part of the induction process at Greenergy for managers and those in specific areas where they are responsible for 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 understanding of modern slavery across the business, Greenergy has implemented this training for all line managers including those working in our retail stores. The training was first extended to these employees in 2023 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 helpline, though note that no such grievances, tips or reports have been received to date.

2024 training summary

Over 200 employees across the Greenergy Group completed the training in calendar year 2024, resulting in a completion rate of 96% of those who were assigned the training.

The training is being reviewed and, when needed, updated to ensure it remains effective in educating our employees around modern slavery risks. The training will be relaunched in 2025.

7. Future plans

We will continue to assess our operations and markets to identify any emerging risks to 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 2025.

Our whistleblowing procedure will also be updated in 2025 as new guidelines are introduced. The helpline numbers are already available on our website, but further enhancements will be made to increase the helpline accessibility by anyone believing a violation is occurring. We believe that opening the helpline to external stakeholders will empower them, if the need arises, to report any suspicion of wrongdoing around modern slavery and draw our attention to issues that may otherwise go undetected. To ensure anyone reporting feels as comfortable as possible, the anonymous report option will be available.

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 2024, and with respect to GFC, the GFC reporting period.

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

GREENERGY FUELS HOLDINGS LIMITED
GREENERGY INTERNATIONAL LIMITED
GREENERGY FUELS LIMITED
GREENERGY FLEXIGRID LIMITED

On behalf of GGL



Name: Adam Traeger

Title: Chief Executive Officer

Date: 28 May 2025

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 GFC reporting period.

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: Adam Traeger

Title: Director

Date: 29 May 2025

Entities covered by the
UK's Modern Slavery Act

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

Entity covered by Canada's
Fighting Against Forced Labour
and Child Labour in Supply
Chains Act

Greenergy Fuels Canada Inc. /

Carburants Greenergy du Canada Inc.:

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

Greenergy