

A blue-tinted photograph of an industrial facility, likely a power plant or refinery. The image shows a complex network of metal structures, pipes, and scaffolding. In the lower-left foreground, two workers wearing hard hats and safety gear are walking up a set of stairs. The overall scene is industrial and technical.

Modern Slavery Statement 2025

Greenergy

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1. About this statement

This Modern Slavery Statement (the “Statement”) is published in accordance with:

- Section 54 of the UK Modern Slavery Act 2015; and
- Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Canadian Act”).

The Statement is published by the Greenergy Group Ltd (Greenergy Group), for which it acts as the parent company. It describes the approach taken by the Greenergy Group to identify, assess and address the risks of modern slavery, forced labour and child labour within its operations and supply chains.

This Statement covers all Greenergy Group controlled entities in all regions. Specific entities required to report under the UK Modern Slavery Act 2015 for the financial period ending 30 September 2025¹ are:

- Greenergy Group Limited
- Greenergy Fuels Holdings Limited
- Greenergy International Limited
- Greenergy Fuels Limited
- Greenergy Flexigrid Limited.

This Statement also covers Greenergy Fuels Canada Inc. / Carburants Greenergy du Canada Inc. (GFC), the Greenergy Group entity required to report under the Canadian Act.

This Statement describes the steps taken during the reporting periods to prevent and mitigate the risk of modern slavery, forced labour and child labour. Where no instances have been identified, this is stated.

What we mean by modern slavery

For the purposes of this Statement, modern slavery refers to situations where a person is exploited for personal or commercial gain and cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power or vulnerability. Modern slavery can take many forms, including forced labour, child labour, human trafficking, and other practices that deprive individuals of their freedom and dignity.

This definition is aligned with the UK Modern Slavery Act 2015 and the Canadian Act. References in this Statement to modern slavery include the concepts of forced labour and child labour as defined under applicable UK and Canadian legislation.

Greenergy Group has a zero-tolerance approach to 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.

¹ In 2025, Greenergy changed its financial reporting year to run from 1 October to 30 September. For those entities required to report under the UK Modern Slavery Act 2015, this statement covers the nine-month period to 30 September 2025. GFC had elected to change its financial year end to 30 September in 2024, and as such, this Statement as it relates to GFC covers the twelve months from 1 October 2024 – 30 September 2025 (GFC reporting period).

2. Organisation structure, operations and supply chains

Greenergy is a leading supplier and distributor of transportation fuels and a major European producer of biodiesel, with established operations across the UK, Ireland, France and Canada². Headquartered in the United Kingdom, Greenergy operates across the supply, production, blending, distribution and retail of traditional and renewable fuels. It operates primarily across the UK, Ireland, France and Canada, with additional sourcing, trading and support activities conducted globally.

Group structure and operations

Greenergy supplies transportation fuels to a broad range of customers, including oil companies, supermarkets, independently owned forecourts, commercial operators, and aviation and marine users. In addition to fuel supply, Greenergy manages logistics and stock management services for many customers, including delivery coordination and site inventory management.

Greenergy continues to invest in renewable fuel solutions to support customers through the energy transition. This includes waste-based biodiesel manufacturing operations in the UK and the Netherlands and renewable fuel blending activities in its key markets: UK, Ireland, France and Canada.



The Greenergy way

Greenergy strives to conduct 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 are committed to delivering 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, Respect, Ownership, Care and Integrity, underpin every interaction we have with stakeholders, including colleagues, customers, suppliers and the communities in which we operate.



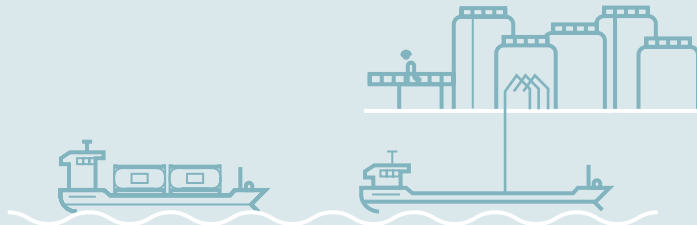
² On 1 October 2025, subsequent to the reporting period of this Statement, Greenergy acquired the Armorine Group, an established supplier of fuels and lubricants in France, marking Greenergy's entry into the French market.

2. Organisation structure, operations and supply chains

continued

What we do

Our global supply chain enables us to source, produce and deliver traditional and renewable fuels to our customers.



Global origination

We source fuel products and feedstocks from global markets. The flexibility and optionality in our purchasing enables us to respond quickly to changing market requirements and ensure supply resilience for our customers.



Renewable fuels

We manufacture biodiesel from wastes at our plants in the UK and the Netherlands, as well as supplying a range of other renewable fuels.



Logistics

We offer end-to-end fuel supply chain management for our customers, including stock management, delivery coordination, logistics and site inventory management.



Retail

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



Customer sales

We supply ground, aviation and marine fuels to a range of customers, including oil companies, supermarkets, retail and commercial customers.



2. Organisation structure, operations and supply chains

continued

Supply chains

Greenergy’s supply chains are global and involve the sourcing of fuel products and renewable feedstocks from a wide range of counterparties operating across different jurisdictions. Key elements of the supply chain include:

- sourcing of fuel products and renewable feedstocks;
- aggregation and collection of waste-derived materials used in biodiesel production;
- manufacturing and blending of fuels;
- transportation, storage and logistics services; and
- wholesale and retail fuel sales.

Due to the international nature of these activities, Greenergy engages with suppliers, contractors and service providers operating under different legal frameworks and labour standards. This diversity increases the importance of robust risk assessment and due diligence processes, particularly in relation to forced labour and child labour risks.



2. Organisation structure, operations and supply chains

continued

Operations by region³

United Kingdom

In the UK, Greenery supplies and distributes transportation fuels, including renewable fuels, to a range of customer sectors. Greenery also manages fuel supply chains for customers, including stock management, logistics and delivery services. The Group manufactures waste-based biodiesel at facilities in the UK and the Netherlands and sources fuel products and feedstocks globally through established trading relationships.

Greenery also supplies independent retailers across the UK.



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.

This section provides context for the identification and assessment of modern slavery, forced labour and child labour risks described later in this Statement.



³ Operations by regions that are required to publish a Modern Slavery Statement.

3. Policies and Governance

Greenergy maintains a framework of policies and governance arrangements designed to support ethical business conduct, protect human rights and prevent modern slavery, forced labour and child labour within its operations and supply chains.

Governance and oversight

Responsibility for oversight of modern slavery risks sits with senior management and the Boards of the relevant Greenergy Group entities. Policies are approved at an appropriate senior level and are supported by internal controls, reporting mechanisms and escalation processes. This Statement is reviewed and approved by the Boards of GGL and GFC in accordance with applicable legislation.

Policies

The following core policies and standards underpin Greenergy's approach to preventing modern slavery and related human rights abuses:

- **Code of Business Conduct and Ethics**, which applies to all employees and sets out expectations for lawful, ethical and respectful conduct, including the protection of human rights and the elimination of discrimination, harassment and abuse in the workplace. It also promotes a positive work environment through Greenergy's Respect Agenda, and the Greenergy Way. For more information on the Greenergy Way, visit greenergy.com
- **Business Conduct and Ethics Principles for Business Partners**, which communicate Greenergy's expectations to suppliers, contractors and other third parties, including Greenergy's zero-tolerance approach to modern slavery, forced labour and child labour.
- **Environmental, Social and Governance (ESG) Policy**, which outlines Greenergy's commitment to responsible business practices, including respect for internationally recognised human and labour rights.
- **Safety, Health, Environment and Quality (SHEQ) Policy Statement**, covering safety, health, environment and quality, and designed to safeguard the welfare of individuals who work for or are affected by Greenergy's activities.
- **Know Your Business Partner (KYB) procedures**, which require risk-based screening and due diligence of new suppliers and customers, including consideration of modern slavery risks.
- **Grievance and whistleblowing procedures for each jurisdiction**, which provide mechanisms for employees and other stakeholders to raise concerns confidentially and, where appropriate, anonymously. Greenergy's 'Report a concern' is available 24/7, in multiple languages.
- **Anti-harassment and bullying procedures**, which support a safe and respectful working environment across all jurisdictions in which Greenergy operates.
- **Screening processes**, which 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.

These policies are reviewed periodically to ensure they remain appropriate, effective and aligned with legal and regulatory requirements in the jurisdictions in which Greenergy operates. For more information visit the [Greenergy Group's policies here](#).

4. Risk assessment of forced labour and child labour

Greenergy recognises that the risk of modern slavery, forced labour and child labour can arise in any sector or geography and is committed to identifying and assessing these risks across its operations and supply chains.

Approach to risk assessment

Greenergy undertakes regular risk assessment activities to identify areas of its business and supply chains where there is an increased risk of forced labour or child labour. Greenergy applies its Business Conduct and Ethics Principles for Business Partners into due diligence practices to ascertain that our suppliers are aligned with our expectations from the start of the relationship. We also seek to include 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 a regular basis, and any allegations around modern slavery or human exploitation are reviewed.

These assessments consider a range of factors, including:

- the nature of goods and services procured;
- the complexity and length of supply chains;
- geographic risk indicators, including the strength of labour protections and enforcement in relevant jurisdictions; and
- the use of third-party contractors and labour providers.

Country risk is a key element of Greenergy's assessment process. Greenergy considers recognised external indices⁴ and, where relevant, trade sanctions and other regulatory considerations. Greenergy's policies also prohibit trading with countries where other factors such as trade sanctions exist.

Key risk areas

Based on its assessment, Greenergy has identified that its renewable fuels activities present a comparatively higher inherent risk of forced labour and child labour. This is primarily due to the sourcing of renewable feedstocks through complex, multi-tier supply chains involving a large number of counterparties operating in different jurisdictions. Additional risk factors may arise through the use of third-party logistics providers and contractors, particularly where labour-intensive services are involved.

While Greenergy's direct workforce is largely employed in jurisdictions with strong labour protections, Greenergy recognises that risks may still arise and therefore maintains appropriate controls. To date, Greenergy has not identified any instances of forced labour or child labour within its operations or supply chains during the reporting periods. As a result, no remediation actions or measures to address loss of income for affected individuals have been required.

Please refer to *Effectiveness and performance measurement*, on p12, for more information.

⁴ Financial Action Task Force (FATF) and Transparency International's Corruption Perception Index (CPI).

5. Due diligence process

Greenergy applies risk-based due diligence processes to support the identification, prevention and mitigation of modern slavery, forced labour and child labour risks within its operations and supply chains.

Business partner onboarding and monitoring

Greenergy's Know Your Business Partner (KYB) procedures apply to the onboarding of new suppliers, contractors and customers. These procedures include:

- Risk-based screening of prospective business partners;
- Consideration of geographic, sector and activity-related modern slavery risks; and
- Confirmation that business partners have standards and controls in place that align with Greenergy's zero-tolerance approach to modern slavery, forced labour and child labour.

Where elevated risks are identified, enhanced due diligence may be undertaken, and mitigation measures may be required as a condition of engagement. Business partner relationships are subject to regular monitoring, and any allegations relating to human rights or labour standards are reviewed and escalated in accordance with internal procedures. In severe cases, Greenergy may suspend or terminate a relationship.

Contractual controls and standards

Greenergy seeks to include modern slavery-related provisions in contracts with suppliers and other business partners, particularly in higher-risk areas. These provisions are designed to set clear expectations, support compliance with applicable laws and enable Greenergy to take appropriate action where concerns are identified.

Workforce due diligence

Greenergy applies appropriate recruitment and employment screening processes across its operations, including verification of identity and right to work, in line with local legal requirements. These processes are intended to reduce the risk of forced labour, child labour and other forms of exploitation within Greenergy's direct workforce.

Certifications and assurance

Greenergy Group entities involved in the collection, production, manufacturing and supply of biofuels are subject to externally recognised certification schemes in compliance with the Renewable Energy Directive (2018/2001). These schemes include requirements relating to social sustainability, safe working conditions, respect for human and labour rights and compliance with applicable laws and international standards. Products bought and sold under these schemes are required to be supported by proof of sustainability documentation.

6. Actions taken and remediation

During the reporting periods, Greenergy continued to implement and strengthen the controls and processes described in this Statement to address the risk of modern slavery, forced labour and child labour.

Actions taken

Key actions taken during the reporting periods include:

- Applying risk-based KYB due diligence to new and existing business partners, with a specific focus on modern slavery risks;
- Ongoing monitoring of supplier and business partner relationships;
- Use of contractual standards to reinforce expectations relating to human rights and labour practices;
- Improved accessibility of grievance and reporting channels to internal and external stakeholders across our operations and supply chains; and
- Delivery of targeted training to employees in roles associated with procurement, logistics and people management. Refer to *Training* for more detail.

Remediation and outcomes

No instances of forced labour or child labour were identified within Greenergy's operations or supply chains during the reporting periods. Accordingly, no remediation actions were required, and no measures were taken to remediate loss of income for affected individuals.

Greenergy recognises that effective management of modern slavery risks requires continuous improvement and remains committed to reviewing and enhancing its actions as risk profiles evolve.

7. Training

During the period, mandatory and comprehensive modern slavery training was delivered to employees within the Greenergy Group in roles associated with procurement, logistics and people management.

In July 2025, Greenergy reviewed and enhanced its existing modern slavery training programme to strengthen coverage of key risk areas and to incorporate interactive, scenario-based examples designed to improve understanding and engagement.

Prior to the update, over 250 employees across the Greenergy Group had successfully completed the previous version of the training. Since the launch of the enhanced programme in July 2025, Greenergy recorded a 79% completion rate as at 30 September 2025.

Looking ahead, training will continue to play a key role in the Greenergy Group's management of modern slavery.

8. Effectiveness and performance measurement

Greenergy evaluates the effectiveness of its actions to prevent modern slavery, forced labour and child labour through defined performance indicators that focus on training uptake, business partner due diligence and the operation of reporting mechanisms.

Methodology

Greenergy's effectiveness assessment is based on the review of internal management information, including training completion data, KYB due diligence records and reports received through grievance and whistleblowing channels, and is conducted periodically by relevant functions with escalation to senior management where appropriate.

Performance indicators

The effectiveness of Greenergy's approach is assessed using the following indicators:

- **Training completion rates**, Completion of mandatory and comprehensive modern slavery training monitored and escalated as required. Refer to *Training* on p11 for more detail.
- **Risk-based business partner due diligence**, conducted through Greenergy's Know Your Business Partner (KYB) process. This includes screening and, where required, enhanced due diligence of suppliers and other business partners, with specific consideration of modern slavery, forced labour and child labour risks.
- **Monitoring of grievances and reports**, including concerns raised through internal grievance procedures and the independent reporting channel, which is available to employees across our operations and supply chains.

Findings and review

During the reporting periods, no modern slavery-related grievances, concerns or reports were identified through Greenergy's reporting channels. KYB screening and ongoing monitoring did not identify any instances of forced labour or child labour requiring remediation.

Greenergy recognises that risk profiles may change over time and continues to review and refine its assessment processes to ensure emerging risks are identified and addressed. These indicators are reviewed on an ongoing basis to assess whether its controls are operating effectively and to identify areas for improvement. Enhancements to training content and increased participation levels form part of Greenergy's efforts to strengthen the effectiveness of its approach to managing modern slavery risks.

9. Future commitments and continuous improvement

Greenergy recognises that addressing the risks of modern slavery, forced labour and child labour requires ongoing attention and continuous improvement. Over the next reporting period, Greenergy will continue to strengthen its approach by building on the controls and processes described in this Statement.

Key areas of focus include:

- **Training and awareness:** continuing to roll out the enhanced modern slavery training programme and increasing completion rates among employees in relevant roles, with a particular focus on procurement, logistics and people management functions.
- **Supplier and business partner engagement:** further embedding modern slavery considerations within the KYB process and encouraging business partners in higher-risk areas to strengthen their own controls and awareness.
- **Risk assessment and monitoring:** regular review of risk profiles across Greenergy's operations and supply chains, including monitoring for emerging geographic, sector or regulatory risks.
- **Reporting and escalation mechanisms:** enhancing awareness and accessibility of grievance and reporting channels, including for external stakeholders where appropriate, to support early identification and escalation of concerns

Greenergy will continue to review the effectiveness of its approach and refine its processes as its business and risk environment evolve.

10. Review and approval

This 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 30 September 2025, and with respect to GFC, the GFC reporting period.

This Statement covers all companies within the Greenergy Group, for which GGL acts 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 Group Limited
- Greenergy Fuel Holdings Limited
- Greenergy International Limited
- Greenergy Fuels Limited
- Greenergy Flexigrid Limited

On behalf of GGL



Name: Adam Traeger

Title: Chief Executive Officer

Date: 31 March 2026

11. Canada Statutory Attestation

This Statement was approved pursuant to subparagraph 11(4)(a) of the Canadian Act by the Board of Directors of GFC.

In accordance with the requirements of the Canadian 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 Canadian Act, for the GFC reporting period listed within this report.

I make the above attestation in my capacity as a director of the Board of GFC, for and on behalf of GFC.

Greenergy Fuels Canada Inc. /
Carburants Greenergy du Canada Inc.

I have the authority to bind GFC



Name: Adam Traeger

Title: Director

Date: 31 March 2026

Entities covered by the
UK's Modern Slavery Act 2015

Greenergy Group Limited: registration number: 14687901,
Ilona Rose House, Manette Street, London, W1D 4ALD

Greenergy Fuels Holdings Limited: registration number: 07318726,
Ilona Rose House, Manette Street, London, W1D 4AL

Greenergy International Limited: registration number: 02809935,
Ilona Rose House, Manette Street, London, W1D 4AL

Greenergy Fuels Limited: registration number: 04058825
Ilona Rose House, Manette Street, London, W1D 4AL

Greenergy Flexigrid Limited: registration number: 07581532
Ilona Rose House, Manette Street, London, W1D 4AL

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

Greenergy