

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 parent company of the Group. This 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 2020.



Our business and supply chain

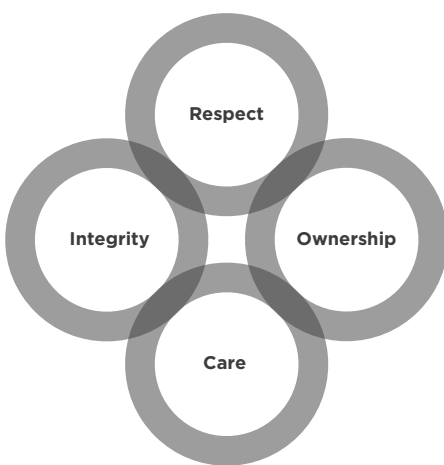
Greenergy has built a unique global supply chain that enable us to efficiently source and produce renewable fuels in the most efficient way to supply our customers and our own retail network. Greenergy has a significant retail presence in both Canada and Ireland.

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, Canada, Asia, Australia and the Middle East.

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.

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 introducing 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 and are also extended to our suppliers:

- » Compliance with all applicable legislation in the jurisdiction in which business is conducted
- » Adherence to good employment practices
- » Best endeavours 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, equality and inclusion; a dedicated employee led Diversity, Equality and Inclusion group was set up in 2020, open to all. The Group is currently developing initiatives and strategies to promote Diversity, Equality and Inclusion across the Group and has contracted a specialist third party to support with this activity.

Greenergy protects its employees' rights to a working environment free from harassment and intimidation. Our anti-harassment and bullying policy is 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 remains a priority for us. Throughout the COVID-19 pandemic, Greenergy has proactively reviewed and considered the safety and wellbeing of all employees, for example by transitioning to remote working wherever possible and implementing further health and safety measures for essential staff who were required to work on the Group's premises. Greenergy also expanded its wellness programme, introducing mental health awareness training to equip staff to look out for their colleagues during the pandemic.

Greenergy's Code of Business Conduct and Ethics is at the core of our operations and is reviewed annually by the Group's Ethics Committee to ensure it reflects our values and expectations of staff consistently and comprehensively. To ensure a better understanding, the Code is translated in relevant languages and available on the Group's Intranet. Our employees understand that if they become aware of any unethical or illegal behaviour, they are expected to report it. Staff can choose to report directly to a line manager, or, to protect those who wish to remain anonymous, through the whistleblowers' helpline, available and accessible to all our employees.

The helpline is available in different languages, 24/7 ensuring it is readily available to all employees. Whistleblowers are encouraged and supported without fear of retribution or retaliation, and a dedicated campaign was run in 2020 to encourage staff to “Speak up” and use the hotline. Greenergy is conscious that as more staff are working remotely due to the COVID-19 pandemic, and the whistleblowers' helpline is an important tool to ensure employees still feel comfortable reporting any wrongdoings in good faith.

Due diligence in the supply chain

Greenenergy's has a dedicated team responsible for the on-boarding process for all business partners, and specifically the risks associated with each new business relationship. All information captured on the prospective business partner is thoroughly scrutinised.

For cases where serious concerns are discovered, a report is sent to the Group's Risk Committee for further consideration and review. This report includes information on modern slavery allegations or investigations. The team periodically reviews due diligence on 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.

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 governs the relationship with the business partner from the start, and is embedded in the business relationship.

Prevention and monitoring

Greenenergy's Ethics Committee assists Greenenergy Group Holdings Limited's Board in ensuring the Group's values are understood by staff and upheld. The Ethics Committee oversees the ethical policy framework and monitors the ethical standards to ensure the Group is compliant from a legal, professional, and ethical perspective. The Ethics Committee is invested and committed to ensure the ethical standards are upheld internally and externally.

The Committee agreed to contact Greenenergy's suppliers and actively engage them in visits in 2020, however due to the COVID-19 pandemic, the on-site visit programme was temporarily suspended. An alternative method to actively engage the Group's suppliers in an open dialogue is currently being considered.

The Committee was especially conscious of the risk to our workforce due to the changing of the working environment abruptly. The Committee created a campaign to promote the use of the whistleblowers' helpline as well as monitoring any possible signal of distress among employees. The Committee also encouraged the maintenance and improvement of the due diligence practices, to ensure our processes satisfied our due diligence requirements.

Review

This statement has been approved on behalf of the Group of Greenenergy companies, by the Ethics 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 Greenenergy Group, in particular entities that under the Modern Slavery Act 2015 are mandated to publish an annual Modern Slavery Statement:

Greenenergy Fuels Holdings Limited

Greenenergy International Limited

Greenenergy Fuels Limited

Greenenergy Flexigrid Limited

Inver UK Limited



Richard Clifton

Group General Counsel
25 June 2021