

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 2019.



Our Business and Supply Chain

During the years our continuous growth lead us to become the main supplier of road fuels in both UK and Ireland. Greenergy is now expanding internationally, with global operations in different areas of the world.

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

Our Values and Policies

Greenergy as a Group is committed to oppose to slavery and human trafficking in any form. The requirements listed below apply to our own operations and are extended 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

Greenergy's values are our strength and foundation:

- **Respect:** Greenergy values its employees' job, because everyone is contributing to the company's success doing an important and worthwhile job. As an employer, we want our people to feel respected, supported, valued, happy and safe when coming to work.
- **Ownership:** Each Greenergy's employee owns the job and knows it best, but we always aim to improve ourselves, develop further our knowledge and fix situations that did not have the expected outcome.
- **Care:** Greenergy promotes care in all its forms while performing our jobs, but also while interacting between colleagues to understand the whole system and how jobs connect to each other.
- **Knowledge:** Greenergy wants that all the employees have the knowledge, tools and skills adequate to perform their jobs. When employees do not understand what is happening, we want them to be confident to stop and ask for clarifications. No criticism or blame is allowed, because while stopping, our employees demonstrate Respect, Ownership and Care.

Greenergy is committed to promoting equal opportunities including recruitment, employment, training and promotion. It is the Greenergy's policy not to discriminate against its workers. Greenergy 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.

Greenergy's Code of Business Conduct and Ethics is at the core of all our documents and is reviewed annually by the Ethics Committee to make sure it reflects our expectations and values correctly and comprehensively. Our employees know that if they become aware of any unethical or illegal behaviour, they are expected to report it directly to a line manager, or, to protect who wish to remain anonymous, a whistleblowers' hotline is available and accessible to all our employees. Whistleblowers are encouraged and supported through internal campaigns without fear of retribution or retaliation.

Prevention and monitoring

Greenergy's Ethics Committee assists Greenergy Fuels 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 on a legal, professional, and ethical perspective. The Ethics Committee is invested and committed to ensure the ethical standards Greenergy sets as a business are met internally and externally, and as part of its functions mandated a series of actions to ensure modern slavery and human rights related issues are addressed in a consistent and adequate manner by the business.

The Committee established to contact the suppliers and actively engage them in visits to ensure the values and expectations set out by Greenergy are understood and shared by our supply chain and is monitoring closely the outcome of the visits started in 2019.

As part of Greenergy Modern Slavery Programme, we have contacted our major suppliers in order to assess their approach to combating slavery and human trafficking and ascertain if suppliers share the same values we do. The initial reviews were undertaken through questionnaires, which were sent out to our suppliers. When applicable, our review also included the analysis of suppliers' modern slavery statements.

Moreover, in 2019 Greenergy started to visit suppliers to confirm their activities are conducted in conformance with our expectations and risks are adequately assessed and mitigated. In particular, Greenergy found a visit at the premises of one of our major UCO supplier extremely helpful and constructive. During the visit, Greenergy staff were welcomed in the facilities and were offered the chance to talk with the workers and the supplier illustrated in detail the procedures in place.

As part of continues improvement and development of Greenergy Modern Slavery Programme, more direct visits will be arranged in 2020.

The Code of Conduct is reviewed annually together with other core policies, and adherence is monitored and documented, with annual refresher cycles and follow up until completion. The whistleblowers' hotline is advertised on our Intranet and by posters and mugs available in each Greenergy location and constantly promoted to ensure each employee knows of its existence and is comfortable to use it. The service is available in different languages to avoid employees feeling intimidated to report by the language barrier.

Greenergy has established and improved a due diligence process to vet all new suppliers to make sure there is no involvement in any criminal investigations, including violations of human rights. A dedicated Team is running checks on onboarding suppliers to identify any possible misalignment and report accordingly to the business.

To effectively promote the Modern Slavery legislation contract clauses are embedded in our contracts templates that require suppliers to confirm compliance with the applicable legislation. The clauses were, and will be, introduced in new contracts and as part of contract renewals. Greenergy always insists on open and honest communication across the business and made sure the message conveying our expectations was clear and consistent for all our suppliers: they 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.

This Statement covers all companies within 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

Greenergy applies the same standards to all the Group companies.



Richard Clifton

Company Secretary

29th June 2020
