

Greenergy Group Holdings Limited Anti-Slavery and Human Trafficking Statement

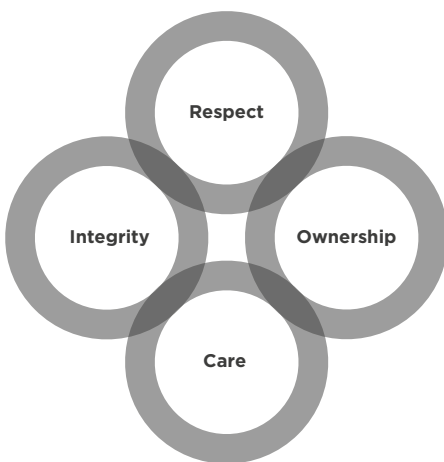
The statement is published by the Greenergy group for which Greenergy Group Holdings Limited (“GGHL”) acts as a parent company. The statement reflects Greenergy Group’s approach towards the risk of modern slavery within its business and supply chain and refers to the financial year ending 31 December 2022.



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”](#). Here 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 prevent modern slavery and human trafficking in any part of the business and supply chains. The company is also dedicated to encouraging all its business activities to promote equal opportunities including employment, training, promotions, recruitment, selection, health and safety, diversity and inclusion.

We attribute our success to our people and our Diversity, Equity and Inclusion (DEI) mission is to ensure all staff at Greenergy have a positive lived experience that is consistent with our shared values of respect, ownership, care, and integrity. It is this mission that is driving our work on DEI, centred upon policy and training. The Greenergy culture is based upon respect, regardless of role, age, race, gender or any other societal typecast and creating an inclusive workplace where every individual feels they can be themselves. Having employees from a variety of backgrounds helps us apply different perspectives to problem solving and allows us to continuously challenge and innovate. It also allows us to gain a better understanding of the communities in which we operate. This year, we restructured our DEI Working Group and hosted Greenergy's first Inclusion Week, which saw staff from around the world take part in a variety of activities designed to ensure everyone at Greenergy is respected, valued and welcome.

In line with our Anti-harassment and bullying policy, Greenergy is committed to safeguarding employees and does not tolerate any unethical behaviour, bullying, abuse or discrimination. The company maintains a zero-tolerance policy for bullying and harassment, aiming to encourage honesty and respect to all employees. Greenergy's aim is to encourage an environment of openness, support, and speaking out against any disrespectful behaviour.

Greenergy has a health and safety statement that proactively outlines our approach in ensuring a healthy working environment for employees. The company has developed a workplace wellbeing policy to promote mental health awareness for employees, as well as health and safety. Greenergy encourages all employees to participate in activities and sessions, in order to raise awareness of the importance of taking care of one's mental wellbeing and actively supporting it. A dedicated and confidential helpline is available for all employees with mental health advisors and professionals to offer support.

At Greenergy, each employee that recognises any suspicious behaviour is encouraged to report it immediately. Any issue may be reported to the line manager or anonymously via a whistleblower hotline that is available for all employees. To ensure that employees feel comfortable in calling the helpline, it is open 24/7 and available in various languages. Greenergy encourages employees to report any concerns and they can disclose without fear of retribution or retaliation.

Greenergy's Code of Business Conduct and Ethics remains the core component among all our policies, and it undergoes a review on annual basis by Greenergy Group's Ethics Committee. The Code is re-certified annually and all employees are required to review it and explicitly confirm they completed the review and understand the policy. The Code is made available in a variety of languages and can be accessed by all employees at any time through the company intranet. The Policy is also available on our public website.

Due diligence in the supply chain

Greenergy is dedicated to preventing modern slavery throughout our supply chain. All stakeholders and business partners are expected to meet the same principal standards. Greenergy has a zero-tolerance approach against Human Trafficking in any shape or form and is committed to ethical and honest conduct at all times in all its business operations as well as cooperating with business partners with the same values at the forefront. 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 involved in any business relationship; a final report is issued to be approved by the Group's Risk Committee, and any Modern Slavery risk is appropriately highlighted to inform the Risk Committee. The KYB Team also monitors any adverse media involving existing suppliers. If any suspected violation of human rights is identified, the KYB Team reports it internally as appropriate. This way, the allegation can be assessed, and the correct mitigation action can be implemented, including termination where necessary. Greenergy is taking steps to prevent any risks throughout our supply chains by enhancing how we engage with suppliers, focusing on those particularly exposed to Modern slavery and Human trafficking risks.

The queries on Modern Slavery included in our suppliers' onboarding forms remain crucial to understanding their practices and procedures. Suppliers are required to confirm that they have equivalent standards as the ones set by our "[Business conduct and ethics principles for business partners](#)". If they are unable to confirm it is the case, this will lead to an unsuccessful onboarding process. Greenergy also includes a set of specific and dedicated contractual clauses in all new contracts and contracts due for renewal with our existing counterparties. In this manner, we ensure our expectations are made clear from the start and supported also by our contractual position, irrespective of the goods or services provided by the supplier.

Prevention and monitoring

Greenergy's Ethics Committee ensures that Greenergy's values and ethics are upheld both internally and externally. The Committee ensures that our ethical standards are being met in all aspects of our business. We are committed to these standards both within our organisations and in our relationship with external partners and stakeholders. The Committee works closely with Greenergy Group's Board to ensure that our ethical policy framework is being accurately directed and monitored.

At Greenergy, all line managers are required to complete a Modern Slavery training module, which is available in multiple languages. This mandatory training is designed to increase awareness and knowledge to employees that, during their day-to-day activities, they may be exposed to situations where they need to be able to recognise if something is not right and know how to address the issue. Greenergy's aim is to promote further training and awareness events to consistently develop policies in line with the Modern Slavery Act 2015. This includes specific training sessions on reporting and raising complaints related to Modern Slavery, as well as evaluating the effectiveness of the training through feedback from participants.

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

Slavery Act 2015 are mandated to publish an annual Modern Slavery Statement:



Christian Flach

Chief Executive Officer

27 June 2023