

Argent Energy Modern Slavery Statement 2023 **(Financial year end 31 December 2023)**

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

Argent Energy has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships. Argent Energy has implemented and enforces effective systems, controls and training to tackle modern slavery in our own business and our supply chains.

STRUCTURE AND SUPPLY CHAINS

Our Code of Conduct (which incorporates our anti-slavery and human trafficking policy) and this Modern Slavery Statement covers Argent Energy Holdings Limited and all its subsidiaries.

Argent uses wastes in the manufacture of biodiesel that predominantly goes to transport to aid decarbonisation. Our customers include fuel suppliers and heavy-duty vehicle fleet operators while our suppliers include traders, collectors and aggregators of wastes that are approved under relevant sustainability schemes. Argent's production facilities are at Amsterdam, Motherwell, and Ellesmere Port.

POLICIES

Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships to reduce the likelihood of slavery and human trafficking taking place anywhere in our business and in our supply chains.

To mitigate modern slavery risks across our business, Argent:

- Operates our plants with a direct employment model for our core operations and we do not use zero-hour employment contracts. We do measure employee turnover and perform exit interviews to understand why employees are leaving. We also perform surveys and focus groups to engage feedback from employees on working conditions and culture.
- Performs diligence on new and current suppliers. This includes asking our suppliers to either complete a questionnaire regarding their policies on anti-slavery or be registered on Achilles UVDB (Utilities Vendor Database) and/or Achilles Oil & Gas. We acknowledge that checks such as this might not stop slavery, but they do help raise awareness of such an important topic early in our engagement with suppliers and is one of a number of actions we take as a business.
- Has published our Supplier Code of Conduct on our website and included it in our Procurement Policy.
- Encourages longer term relationships across our supply chain, including the introduction of supplier scorecards for nominated suppliers.
- Has incorporated anti-slavery clauses into our standard terms and conditions for supply contracts that require suppliers and their supply chains to confirm their adherence.
- Submit our processes to be audited by our parent company's internal audit teams.
- Trains employees on the risk of modern slavery, including ways to identify the signs of modern slavery.
- Acknowledges the risk of slavery is high within construction, IT and recruitment sectors. In recognition of the risk, we identify subcontractors in our contracts. Other controls include additional identification checks on suppliers' employees attending our sites. No one can

attend any of our sites to carry out work without additional identification checks being performed.

- As part of our tender processes, performs detailed cost analysis such as bottom-up costing to check that provision for a fair wage is paid for those indirectly recruited by our supply chain.
- Discourages the use of limited companies by individuals as we are aware of the risk this can bring for individuals to be paid lower than minimum wage legal limits.
- Has a Code of Conduct Policy that is issued to all new starters at the point of induction. It is also re-issued regularly whereby all employees must acknowledge receipt (electronically) and agree to abide by this policy. In addition, mandatory Code of Conduct training has been introduced on our Learning Management System with emphasis on areas such as bullying and harassment.
- Has policies such as 'Respect at Work', 'Whistleblowing' and 'Equality' which are developed from those issued to us by our parent company. These are authorised by our Executive Committee and owned and reviewed by our HR Department.
- Has a grievance procedure available for all employees aligned with the ACAS Code of Practice in the UK and relevant legislation in The Netherlands.
- Knows our limitations and by ourselves we cannot eradicate this issue, but we look to share best practice and continually improve our procedures.
- Has a cross functional modern slavery working group, chaired by our CFO, which discusses our progress and strategy on modern slavery control systems. We know we have more to do and have a roadmap for further control measures such as the implementation of supplier relationship management and a group scorecard whereby KPI's will include measures to monitor any slavery risk.
- Within the improvement roadmap, has identified 5 most relevant KPI's to monitor the status of its modern slavery control systems and is in the process of implementing them
- Similarly, it is in the process of implementing a dedicated modern slavery risk register, in the context of its risk management processes
- For 2024, is considering further measures to assess sustainability risks which will include labour standards.
- Has subsidiaries that operate in the Netherlands and is aware of upcoming Dutch legislation on human rights. Argent will review our procedures in advance of the implementation of this new legislation.

This statement is made in accordance with the requirements under the UK Modern Slavery Act 2015 and was approved by the Board of Directors on 2nd July 2024.

Signed on behalf of the Board of Directors



Louise Calviou
CEO, Argent Energy