

## **Argent Energy Modern Slavery Statement 2020 (Financial year end 31 December 2020)**

### **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.
- 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). 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.
- encourages longer term relationships across our supply chain.
- has incorporated anti-slavery clauses into our standard terms and conditions for supply contracts that requires suppliers and their supply chain to confirm their adherence.
- conducts audits on our suppliers on a risk-based approach (high risk countries, labour) and our own processes are 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. We are a member of the Supply Chain Sustainability School and participant in the working group Scotland Against Modern Slavery.
- acknowledges the risk of slavery is high within construction, IT and recruitment sectors. To mitigate this risk, we perform additional due diligence on suppliers in those sectors. This includes, where possible, the naming of 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 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 during 2021 refreshed and rolled out to our employees our Code of Conduct policy to include updated guidance from Government on issues such as modern slavery.
- knows our limitations and by ourselves we cannot eradicate this issue, but we do share best practice and knowledge with suppliers and other organisations to reduce the likelihood of modern slavery.
- has in 2021 set up 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 where KPI's will include measures to monitor any slavery risk.

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 23<sup>rd</sup> November 2021.

Signed on behalf of the Board of directors

A handwritten signature in black ink, appearing to be 'ER', with a long horizontal line extending to the right.

Erik Rietkerk  
CEO, Argent Energy