

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

1. This Modern Slavery and Human Trafficking Statement is in compliance with Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to the actions and activities for the financial year ending 30 June 2023.
2. Gleaner Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain and in its products. The Company has zero-tolerance towards slavery and require our supply chain to comply with these values.

Organisational Structure

3. Gleaner Ltd has business operations in the United Kingdom.
4. The company operates in the Fuel Oils, Lubricants and Liquefied Petroleum Gas sector. The nature of our supply chain is:
 - a. We work with a number of suppliers who provide us with goods in bulk for resale.
 - b. We work with a number of suppliers who provide us with goods (stationary) and services (IT software) for use by the Company in the performance of its business.
5. For more information on the Company see our Web Site at

www.gleaner.co.uk

Policies

6. We operate a number of internal policies to ensure that we are conducting our business in an ethical and transparent manner. These include:
 - a. A Supplier Code of Conduct – we operate this policy to ensure our suppliers operate in full compliance with the laws, rules, and regulations in the countries in which they operate, and to seek similar commitments across their own supply chain.
 - b. Our Equal Opportunities, Anti-Slavery and Human Trafficking, and Ethical Procurement Policies – show we are committed to the fair treatment of all our staff. Our policies reflect our core values and expected behaviours. The policies make it clear that we have a zero-tolerance approach to Modern Slavery and Human Trafficking, and we ensure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

7. As part of our efforts to monitor and reduce the risk of Modern Slavery and Human Trafficking occurring in our supply chains we have adopted the following due diligence procedures:
 - a. We conduct random External Supplier Audits.

b. We instruct our staff on the signs of Human Trafficking and Modern Slavery for when they are undertaking deliveries at other sites. These suspicions are to be reported to our Management Staffs on return for appropriate action.

8. Our due diligence procedures aim to identify and action potential risks to our business and supply chains, reducing the risk of Human Trafficking and Modern Slavery in our business and supply chains.

Risk and Compliance

9. The Company has evaluated the nature and extent of its exposure to the risk of Modern Slavery and Human Trafficking in our UK supply chain by evaluating the Human Trafficking and Modern Slavery risks of each new supplier.

10. We do not consider that we operate in a high-risk environment as the majority of our supply chain is based in the UK in low-risk industries.

11. We do not tolerate Human Trafficking or Modern slavery in our supply chains. Where there is evidence of failure to comply with our requirements by any of our suppliers we will seek to terminate our relationship with that supplier.

Effectiveness

12. We cannot say with any certainty how effective the steps we propose to take are in ensuring that Human Trafficking and Modern Slavery is not taking place in our business and supply chains. We hope that these steps are a deterrent to the activity.

Authorisation

13. This statement is authorised by the Board of Directors.



D Todd
Managing Director

Dated 11TH JULY 2023.