

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022



# Our Organisation

Genuit Group plc (Genuit) is helping construction build better, by being the UK's leading provider of sustainable water, climate and ventilation management solutions for the built environment.

We recognise the role the built environment has in meeting the requirements of climate change adaptation and resilience, and we develop and manufacture sustainable solutions to the key challenges faced within water, climate and ventilation management. Sustainability is at the heart of how we run our businesses, ensuring we have the most talented, empowered, and diverse teams focusing on our key objectives around growth, innovation and addressing the challenges facing construction.

We are committed to operating responsibly and helping to prevent illegal practices whilst aiming to protect the welfare and human rights of our employees and those associated with our supply chains.

We continuously monitor key processes in relation to our people and our suppliers, to ensure high levels of due diligence, compliance and standards are applied.

The steps we took in 2021 to mitigate risk are detailed in the following report.

This statement, relating to the financial year ending 31 December 2021, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and outlines the steps we have taken as an organisation to assess our operations and supply chain to mitigate any risk of slavery and human trafficking.



## Our Organisational Snapshot



29  
Locations



3,658  
Employed



3,300  
Suppliers

## Our Businesses




# Our People Matter

Our people are the driving force of our business. We are committed to protecting the health, safety and welfare of our people at all times.

## Employment practices

- We recruit employees fairly and lawfully, verifying that all employees have the right to work in the country in which our businesses operate upon commencement of employment.
- The three acquisitions made in the year, comprising of Adey, Nu-Heat and Plura, were appropriately audited and onboarded to ensure they fully comply with our expectations and contractual obligations.
- All employees across the Group are issued a contract of employment before commencement and an Employee Handbook in line with appropriate legislative requirements.
- All employees are paid in accordance with their roles and above minimum statutory pay provisions, which is monitored through our internal audit practices.
- We also take the appropriate steps to ensure everyone who works for Genuit works in an environment in which their fundamental human rights are respected.
- Genuit complies with the employment laws of every country in which we operate in and expects those that we do business with to do the same. A trade sanctions policy is in place which advises our people of steps to take with countries which carry a trading risk and we continue to take steps to provide our procurement and HR personnel with appropriate training in understanding the ever changing global structure and sanctions.



## Helping employees speak up

- We continually seek feedback from our employees through our annual surveys to identify any behaviours or practices that could lead to potential failures in our expected standards. Our confidential feedback approach allows for any potential issues to be raised.
- We operate a Whistleblowing Policy and provide an independent and confidential reporting platform to enable and encourage any employee to raise concerns without the risk or fear of reprisal.
  - In 2021 we fully reviewed the Whistleblowing Policy and reporting process. Committed to maintaining the highest standards of honesty, openness and accountability, activity was undertaken during 2021 to source a reputable, independent and confidential reporting service to enhance whistleblowing procedures. Following the appointment of Safecall, the Group undertook a full review of its policy and procedures and organised a roll out procedure with Safecall's experienced input; jointly designing the reporting landing page and strong messaging. It was important the independent service supported the diversity of our workforce by providing a reporting tool in various languages and availability across different time zones. Paramount to a

successful roll out was the clarity around messaging and accessibility to supporting materials. The launch consisted of a full poster campaign in prominent places around all our businesses to connect with contractors, employees and workers, updates to our policy and individual wallet cards and FAQs being issued to each employee. Messaging was reinforced through works committees and toolbox talks. Now in our third and final phase, to continue to reinforce our commitment to education and understanding around the importance of Whistleblowing, the Group's e-learning module has been updated to align to the new policy design, with a mandatory completion target applied and monitored by our Audit and Risk Committee.





### Employee Training

- Through our E-Learning platform we endeavour to ensure our employees are armed with an understanding of the broader issues of modern slavery to assist them in appreciating the extent of the problem within the UK and across the globe, and to identify areas of the business that may be at risk from inappropriate practices.
- Mandatory refresher training is undertaken on an annual basis for employees employed in specific functions, including broader understanding on topics regarding the implications and complexities of the UK leaving the EU, both in border and trade sanction changes and appropriate regulations and laws.
- Mandatory Whistleblowing training is conducted to drive compliance and ensure understanding of expectations



### Agency Workers

- We only engage with agency workers sourced through reputable and local agency providers and follow the same checks as we do with our suppliers before contracting with an agency provider.
- Where appropriate, we will engage directly with our agency providers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place within their own businesses and undertake detailed site audits relating to their payment practices, conditions and legal compliance processes.
- We require that all agency providers evidence a worker's right to work within the country in which our businesses resides and have found no failures in document checks during our 2021 audits.
- Whilst a number of audits during 2021 highlighted areas requiring minor improvements in document controls, we found no failings in legal worker checks. We have been additionally encouraged by the swift action from our Agency providers to tighten certain processes driven from our recommendations.





# Our Suppliers

- We continue to engage on a priority basis with both our current and new suppliers in respect of our anti-slavery and trade and sanctions policy in order to gain a proper understanding of the measures they have in place, audit the measures they present and provide feedback against our expectations.
- During 2021 where Covid continued to shape our approach to systems and processes. Genuit have continued to review various procurement procedures and practices and continue to carry out supply chain audits, wherever practical. Whilst our risk assessments have continued we have experienced another year where the majority of site visits have not been possible, however additional audit checks of documentation, policies, systems and processes have continued on a digital basis, with 30 due diligence audits completed on a priority basis.
- Due to the pandemic and continued lockdown periods throughout 2021 we have maintained our position in limiting new supplier arrangements into the business and continued to trade with our long standing and trusted suppliers to minimise risk. We continue to conduct virtual meetings with many suppliers and will carry on this way until it is safe to fully reintroduce site based audits across the globe.
- The results of our audits and how our suppliers and their people have adapted to manage our supplies in another turbulent year has been encouraging. We are able to evidence improvements from our supply chain in documentation provided in policies, contracts and processes. It remains clear that the messaging around positive change is filtering through and the need to stamp out Modern Slavery across supply chains is gaining more recognition. We will continue to undertake such duties and activities throughout 2022 to effectively monitor and assess our supply chains, whilst recognising that collaborative working remains vital to effectively mitigate issues and implement positive change where needed.



- Due to already established risks the Group's current sanctions and compliance policy requires prior approval to be requested for trade with any Russian business, but in light of the current situation and the sanctions imposed by the UK, the group have currently taken the decision to cease all trading in any form with customers or suppliers in the Russian Federation with immediate effect.
- Our contractual documentation continues to incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and child labour in line with our policy and we stipulate that our contracted suppliers must hold their own suppliers to the same standards. We widely issue both our statement of intent and policy prior to new contracts being established to make our expectations perfectly clear.
- We reserve the right to terminate any contractual arrangement if there is breach of our anti-slavery policy.
- We expect all suppliers to familiarise themselves with our policy and to act with due diligence and integrity at all times in a way that is consistent with its values.







# Report Summary

This statement is made pursuant to section 54(1) of the Act. The Board approved this statement on behalf of the Genuit Group Board on:

**Thursday, 19<sup>th</sup> May 2022**

Signed for on behalf of Genuit Group.

A handwritten signature in black ink, appearing to read 'Joe Vorih', written in a cursive style.

**Joe Vorih**  
Chief Executive Officer

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