

# Modern Slavery Statement 2023



## Executive summary

Having spent a year in role undertaking a number of initiatives to communicate with many of our employees across the Group, I continue to be encouraged by our people's commitment and focus towards delivering excellent work and concentrating on things that truly matter; such as transparency, respect, and a willingness to continuously improve and commit to elevating diversity and inclusion across our businesses. These matters are key components to a successful future, and I believe, that by driving these commitments, it places Genuit in a position of strength to tackle the challenges and risks of modern slavery in today's society, where 50 million people reportedly ([www.un.org](http://www.un.org)) remain trapped in some form of slavery across the world.

At Genuit, we believe and acknowledge that we have a critical role to play in preventing and addressing modern slavery. We take a zero-tolerance approach to any form of modern slavery or human trafficking violations across our businesses and supply chains, and recognise that we have a duty to ensure we continue to tackle any form of modern slavery or human trafficking through all operations. This is especially prevalent when we continue to face considerable macroeconomic and political uncertainties which creates its own specific set of challenges. We achieve this by applying appropriate business practices and standards across the Group that do not infringe on human rights.

The level of understanding and capabilities across our people, which centre around our shared values and beliefs and the genuine desire to create a better future, has been very inspiring. This, coupled with our strong risk management framework and controls across the business which is delegated through our Risk Committee and implemented through policy compliance workstreams (as outlined within this Statement), I remain confident the business is in an excellent position to continue to maintain a high level of compliance with its Modern Slavery commitments.

A handwritten signature in black ink, appearing to read 'Joe Vorih'. The signature is fluid and cursive, with a large loop at the end.

Joe Vorih  
**Chief Executive Officer**





## Modern Slavery Reporting

This statement, relating to the financial year ending 31 December 2022, 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.



# We are Genuit Group

At Genuit Group (Genuit or the Group) we are focused on creating a more sustainable built environment.

This means increasing its resilience as it adapts to the challenges that climate change creates, alongside reducing the impact that the built environment has upon climate change. For us, sustainability is at the core of both the way we operate and our commercial growth strategy.



## Our Vision

Our vision is to serve the new demands placed upon the built environment while being the lowest carbon supplier of choice for our customers. From January 2023, we re-organised into three Business Units, comprising some of the UK construction industry's best-known brands.

We provide a wide range of solutions for a sustainable built environment; from low carbon heating and cooling, clean healthy air and resilient surface water management through to low carbon choices for drainage and plumbing.

We want to utilise the vast experience and capability that exists in our businesses, close to their customers. At the same time, we recognise that being part of the Group can also create value through scale and unlocking synergies, for the benefit of all our stakeholders.

Although our businesses have strong brands and individual identities, they are underpinned by a Group-wide performance driven culture that promotes accountability, empowerment, and entrepreneurial thinking.

Genuit remains 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 across our businesses to ensure high levels of due diligence, compliance and standards are applied.

## Organisational Snapshot



30

Locations Worldwide.



3,640

Employees

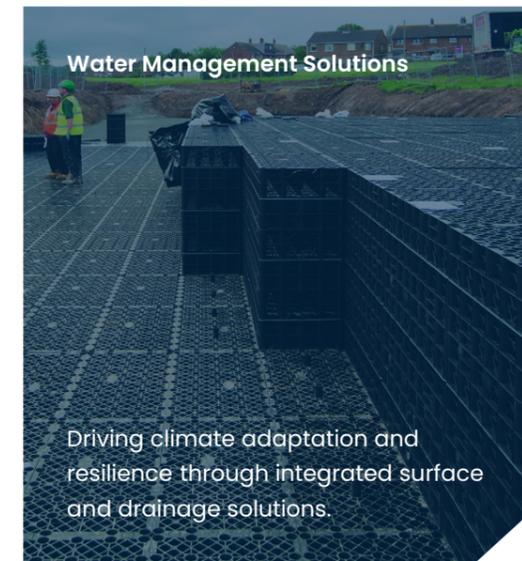


3,300

Global Suppliers

## Our Businesses

In 2022, the decision was taken to restructure the Genuit Group businesses from four Divisions – Residential Systems, Infrastructure and Landscape, Building Services and International, and Ventilation and Climate – into three new Business Units:



# Our Commitments

**At Genuit, we are committed to finding and preventing modern slavery and human trafficking throughout the Group and our supply chains, to enable us to understand the modern slavery risks that may be present.**

We do this by:

- Finding effective methods and practices to eliminate slavery and human trafficking practices in our supply chain. We are working towards an approach of full transparency of our supply chain.
- Ensuring our policies and procedures are reviewed regularly and that we have development and training processes in place to enable our internal teams to have appropriate awareness and understanding of the issues and our responsibilities.
- Ensuring new suppliers understand our requirements before they commence working with us, and that existing suppliers comply with those requirements.
- Ensuring our people are treated fairly and that their fundamental human rights are protected and respected.

The steps we took in 2022 to mitigate these risks are detailed in the following report.



# Our Principles

We continue to abide by the local laws in the jurisdictions in which we operate and expect our basic principles to be upheld across the Group and our supply chains

**The following principles are followed by all businesses within Genuit Group:**

- respect for the dignity of the individual;
- recognise the importance of each individuals' human rights;
- increase equality of opportunity and inclusion;
- not accept any form of discrimination, harassment or bullying; and
- not tolerate any form of slavery, human trafficking or forced or compulsory labour.

These basic principles inform our policies and processes related to the rights and freedoms of every person who works for us, or with us through our supply chain.

During 2022 we continued to develop and implement policies and processes which are intended to extend these commitments. These have been further underpinned by policy compliance workstreams, which address policy priorities and requirements including the development of communication campaigns and training programmes. Throughout 2022 and continuing into 2023, significant effort has been made to improve awareness, encourage feedback, and create further understanding of our key policies, to drive compliance with our regulatory obligations.



# Our People Matter

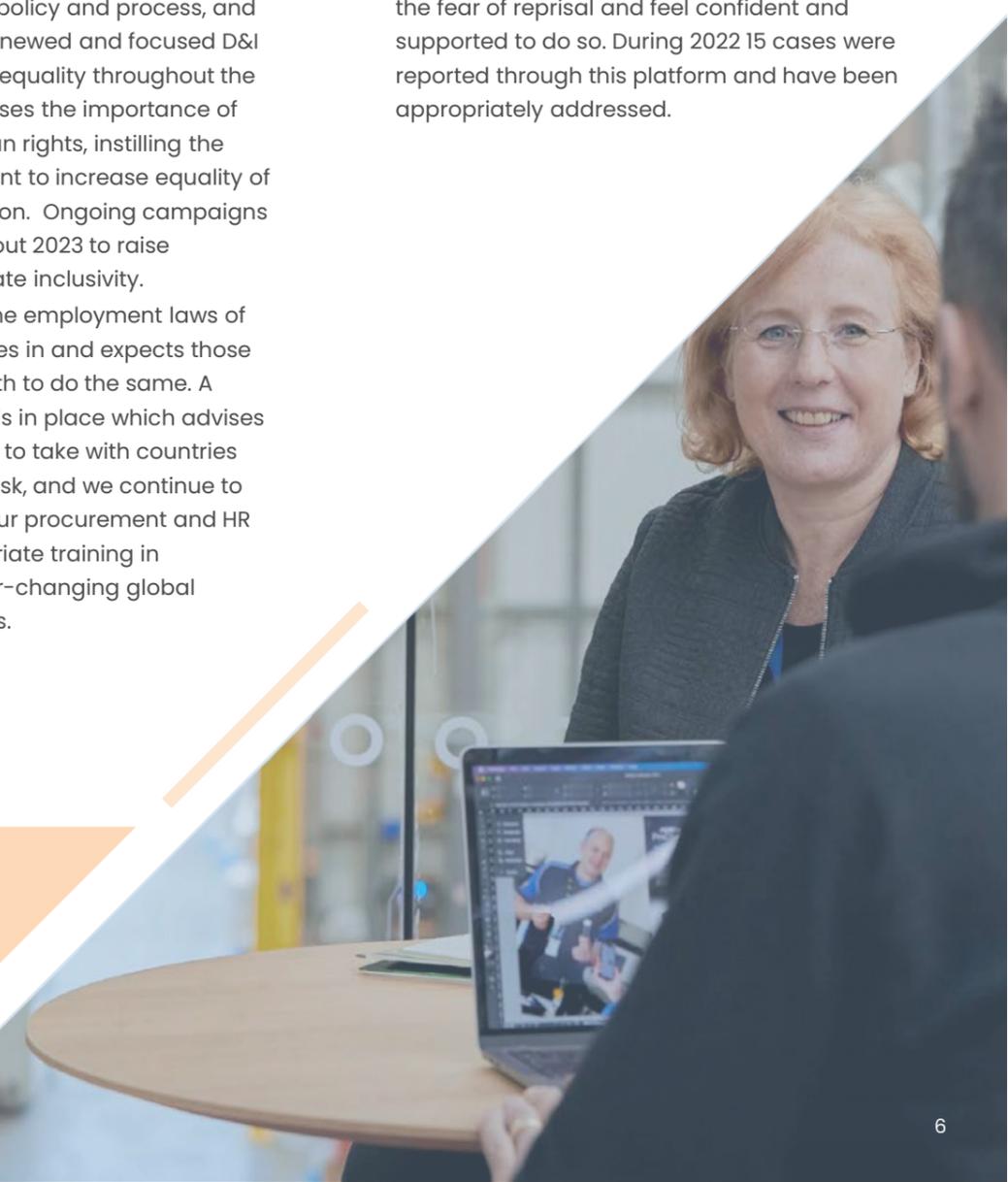
**Our people are the driving force of our business and are fundamental to upholding our basic principles. We are committed to protecting the health, safety and welfare of our people at all times.**

## 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 Company's Recruitment Policy has been reviewed aiming to instil best practice approaches in our right to work checks, vigilance and awareness across our recruitment practices.
- All employees across the Group are issued a contract of employment before commencement in line with appropriate legislative requirements. The Company has made significant investment into a best-in-class HR solution, Workday, which will create efficiencies by synergising the recruitment and onboarding processes across the Group. This will provide increased visibility into our people data within recruitment practices, and drive governance and compliance with an always on audit approach. This is due to be launched during 2023.
- Upon commencement of employment, each new employee is provided with a copy of our Employee Handbook and a suite of key policies, which outline our expectations and basic principles as outlined above. A new Group-wide communications platform, Workplace from Meta, was launched at the end of the year which will ensure our policies and procedures are readily available across the Group. All employees are able to access the platform, allowing for timely and engaging communications, sharing of best practice, ideas and diversity of thought, and facilitating feedback.



- All employees are paid in accordance with their roles and above minimum statutory pay provisions, which is monitored through our internal audit practices. In 2022 the Group HR team was further strengthened with the introduction of a Group Reward Director, a strategic appointment to develop the remuneration strategy, pay policies and practices. We are committed to ensuring that all our people are paid fairly and are working to create a compliance and governance framework to ensure that our pay policies and practices conform to legal requirements and good practice.
- We take the appropriate steps to ensure everyone who works for Genuit works in an environment in which their fundamental human rights are respected. During 2022 we established our diversity and inclusion (D&I) ambition, strategy and renewed policy. Delivery of the D&I strategy focuses on four pillars: leadership, education, policy and process, and communication. The renewed and focused D&I programme promotes equality throughout the workplace and recognises the importance of each individuals' human rights, instilling the Company's commitment to increase equality of opportunity and inclusion. Ongoing campaigns will be shared throughout 2023 to raise awareness and celebrate inclusivity.
- Genuit complies with the employment laws of every country it operates 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 the 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.
- We continually seek feedback from our employees through surveys and other mechanisms 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 in confidence. During 2022 we placed specific focus on employee D&I and held numerous insight sessions across our sites, providing an opportunity for over 400 employees to share their views around D&I - reinforcing our commitment to ensuring our people are treated fairly and their fundamental human rights continue to be protected and respected. This programme will continue throughout 2023.
- As reported in last year's statement, the Whistleblowing policy was relaunched alongside an independent and confidential reporting platform to ensure all employees are aware of how they can raise concerns without the fear of reprisal and feel confident and supported to do so. During 2022 15 cases were reported through this platform and have been appropriately addressed.



# Employee Training & Agency Workers

## 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 Whistleblowing training is conducted to drive compliance and ensure there is an understanding of expectations. A supporting communication and training programme was rolled out between June and September 2022 and achieved a 95% training completion rate across the Group. This is now a mandated process within our induction programmes when joining any of our businesses.

## 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 reside.



# Our Suppliers

Genuit Group remain committed to finding and preventing modern slavery and human trafficking across our supply chains and we are continuing to review and strengthen our supply chain and ensure good awareness of, and compliance with, our policies in relation to modern slavery and human trafficking.

In particular, we expect all our suppliers to act in accordance with our policies and to ensure high levels of integrity in their operations and due diligence of their respective supply chains. Our contracts continue to incorporate specific clauses related to the prohibition of slavery or servitude, the use of forced, compulsory or trafficked labour and child labour.

In addition, we reserve the right to terminate any contractual arrangement if there is a breach of our anti-slavery policy.

During 2022 and into 2023, we have made good progress in a number of specific areas, all of which are intended to further reinforce our commitments and mitigate risk:

- We have completed a strategic review of our Procurement function and implemented a new Group procurement structure which will improve our internal capabilities and drive better performance and set higher standards with our supplier partners.
- We have implemented a new Procurement Policy across the Group, with the objective of further improving our controls around the selection of new suppliers and management of the existing supply base.
- We are in the process of finalising a standardised new supplier onboarding process, which will require new suppliers to certify that they fully comply with our standards and policies in relation to modern slavery and human trafficking.
- We are refreshing our standard supplier terms and conditions to ensure they fully address all current requirements in relation to modern slavery.



Building further on this in 2023 we plan to finalise a Genuit Supplier Code of Conduct document, setting out our ethical expectations of suppliers in a number of areas, including anti-slavery. This will be rolled out to our supplier base on a prioritised basis, together with associated training and face-to-face meetings, starting with our highest risk suppliers. We will share progress on this in our 2024 statement. Lastly, we continue to review our suppliers against relevant trade sanctions lists and risk ratings in compliance with our policies. As reported in 2022, given the ongoing conflict in Ukraine, we have ceased all business with suppliers in the Russian Federation and continue to review and maintain our trade sanctions list on a regular basis to continue to limit risk.



This statement is made pursuant to section 54(l) of the Modern Slavery Act.

The Board approved this statement on behalf of Genuit Group on: **18<sup>th</sup> May 2023**

Signed for on behalf of Genuit Group



**Joe Vorih**  
Chief Executive Officer

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