

Modern Slavery Statement **2026**



Executive summary

As the world navigates through an era of environmental challenges, our commitment to creating sustainable living has never been more vital. Sustainability remains at the heart of our Group strategy, ensuring our products and services help the built environment to mitigate and adapt to the impacts of climate change. With this, we remain focused on operating ethically and are committed to the prevention, detection and reporting of modern slavery in any part of our business or our supply chain. We take a zero-tolerance approach to any modern slavery or human trafficking rights violation. This modern slavery statement ('Statement') outlines our organisational structure and policies and procedures in relation to modern slavery, and the steps we have taken as an organisation to assess our operations and supply chain to prevent and mitigate any risk of slavery or human trafficking. It relates to the financial year ended 31 December 2025, and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

During the year, we have made further progress in improving our governance practices and raising awareness of modern slavery and human trafficking across the Group; establishing a new vision in respect of modern slavery and engaging further with employees to update our modern slavery principles and policies. Further information about these initiatives is outlined in this Statement.

In addition to these improvements, we conducted two employee engagement surveys; one pulse survey in April, and one full survey in September. This acted as an additional mechanism for our employees to provide feedback, enabling us to create focused sessions to drive improvements. Our dedicated Genuit Group Modern Slavery Steering Group has continued to support the Group and Executive Leadership Team in developing and continuously improving our ethical working practices.

I am confident that with the progress made in the last year and the on-going focus on this area, we will place Genuit in a position of great strength to deliver on our commitments, reduce risk, and prevent any modern slavery or human trafficking violations across the Group and our operations.



Joe Vorih
Chief Executive Officer



Genuit Group plc is the UK's largest provider of sustainable water, climate and ventilation products for the built environment. Our solutions allow customers to mitigate and adapt to the effects of climate change and meet evolving sustainability regulations and targets. We operate within the construction industry, serving residential construction, commercial buildings and civil infrastructure, and are focused on creating a more sustainable built environment.



Our purpose

Together, we create sustainable living

Our purpose is delivered through our Sustainable Solutions for Growth strategy. This provides a clear pathway for the Group to create value and fulfil its purpose.

Built on four interdependent themes, our strategy ensures that everything we do is united by our shared commitment to creating sustainable living.



Growth

We combine innovation and commercial excellence, enabling us to consistently outperform our markets. We focus on higher-growth, sustainability-linked market segments supported by structural demand. Growth is delivered through a strong organic pipeline, alongside a disciplined, value-led approach to M&A that strengthens our portfolio and enhances scale.



Sustainability

We provide solutions that help the built environment adapt to climate change and are committed to being the lowest-carbon supplier of choice, reducing our own impact whilst enabling more sustainable outcomes for our customers.



Genuit Business System

We create value through lean transformation and operational excellence. We use the Genuit Business System (GBS) to drive operational effectiveness across the Group. Rooted in lean principles, GBS enables us to operate more efficiently and productively, supporting the delivery of our purpose and strategy while creating value for customers and stakeholders.



People and Culture

We create value and enable growth through the capability, expertise and development of our employees. We know that our people underpin our success. By investing in capability, living our Trademark Behaviours and combining local entrepreneurialism with the benefits of scale, we foster an inclusive, collaborative, high-performance culture.

During 2025, the Group comprised three Business Units:



Climate Management Solutions

Addressing the drivers for low carbon heating and cooling, and healthy air. Brands within this Business Unit include Nuaire, Monodraught, Adey, Surestop, Domus and Nu-Heat & Omnie.



Water Management Solutions

Driving climate adaptation and resilience through drainage solutions. Brands within this Business Unit include Polypipe Civils and Green Urbanisation, Polypipe Ulster and Middle East, Keytec Installation Services, Polydeck, Permavoid and Sky Garden.



Sustainable Building Solutions

Providing a range of solutions to reduce the carbon of the built environment. Brands within this Business Unit include Polypipe Building Products, Polypipe Building Services, Terrain and Effast, Manthorpe, Cistermiser & Keraflo, Talon and Salamander.

The Group serves built environment markets with strong climate-related growth drivers, primarily in the UK and with an increasing focus on international diversification. 84% of our suppliers are located in the UK, as outlined later in this Statement. We have over 3,200 colleagues across the Group. Our workforce is mainly located within the UK, but we also have colleagues in Europe and the Middle East with 97% of our colleagues being permanent and the rest made up of contractors, agency and temporary workers.

The strong progress we have made as a Group on simplifying our organisational structures through the deployment of GBS over the past four years has helped the Group unlock further opportunities. As a further simplification, we took the decision to move to a two divisional structure from the beginning of 2026. This allows us to focus on two segments, Climate and Water, enabling the Group to deliver even more value to our customers and optimise synergies to reinvest in growth for the future. This will be reflected in the Modern Slavery Statement published in 2027, covering the year ended 31 December 2026.

[Read more >](#)



Modern Slavery Reporting

Since the previous Statement, we identified the need for a clearer vision and set of principles for the Group in respect of our modern slavery commitments, to provide the Group with direction and ensure we were continuing to make positive progress in our modern slavery practices. This was in consideration of changes to legislation and best practices, in addition to those changes in our organisational structure. As part of this initiative, we engaged with a group of our early careers colleagues to ensure the proposed vision and principles remained relevant and that they were properly understood and meaningful to all our colleagues, customers, suppliers and partners.

Our Vision

We will create and sustain a business that is a great place to work and partner with. Modern slavery, in any form, has no part to play in our business, our supply chain or our local communities. We aim to support and empower our colleagues, so we can continuously improve our ethical practices and work towards eradicating modern slavery. We will prioritise raising awareness and encouraging our colleagues and partners to do the right thing. We aim to provide assurance, support and build trust, and maintain our standards of excellence.

Our Principles

To achieve our vision, we continue to abide by the local laws in the jurisdictions in which we operate and ensure our principles are upheld across the Group and our supply chains. Our principles are as follows:

1. We value the dignity, safety and well-being of all of our colleagues and those within our supply chain
2. We demonstrate the importance of human rights for everyone
3. We will remain vigilant and aware of evolving best practices
4. We act ethically and with integrity in all our internal processes, business partnerships and relationships
5. We are committed to preventing and eliminating any form of discrimination, harassment, bullying, forms of slavery and/or forced or compulsory labour

Governance

The Genuit Group Modern Slavery Steering Group was established in November 2023. Its purpose is to provide Group-wide direction, challenge and coordination in relation to modern slavery, human rights and ethical labour practices. It drives action and best practice and supports the Board and Executive Leadership Team in discharging their responsibilities for effective governance, risk management and compliance in this area, and in meeting the Group's legal, regulatory and stakeholder obligations. The Steering Group meets a minimum of quarterly in person, has introduced a revised terms of reference and follows an agenda to discuss matters such as compliance, reporting and new initiatives to support and drive the Group's vision. The Steering Group also has primary responsibility for reviewing and implementing the Anti-Slavery and Human Trafficking Policy, monitoring its use and effectiveness, dealing with any queries relating to it, and auditing internal control systems and procedures to ensure they are effective in preventing modern slavery.

The Steering Group is made up of the following:



Colette Thompson
Group Deputy Company
Secretary & Steering
Group Chair

Responsible for modern slavery compliance and corporate governance, including external disclosures, listing requirements and expectations, investor relations and annual reporting requirements.



Amy Smith
Sales Director, Polypipe
Building Products

Responsible for representing the Group's customers, leading the demand for customer enquiries around audits and policy sharing to ensure that we have consistent responses to our customers' requirements across the Group.



Emily Bates
Group Procurement
Director

Responsible for the Group's supply chain, procurement policy and code of conduct, supplier process and practice, inclusive of the supply of temporary labour contracts.



Iain Lewis
Group HR Director

Responsible for policy and process, functional HR and related working practices and provides representation for talent acquisition and talent development.



Jo Thomas
Group Pay Compliance
Manager

Responsible for the Group's pay compliance, ethical pay practices, internal pay audit and recommendations.



Kate Taylor
HR Director, Water
Division

Responsible for HR and related working practices, contingent worker practices and the author of the Group's annual Statement and related policies.



Mark Bracewell
Group Internal Audit
Director

Responsible for internal audit practices, monitoring and measuring of compliance and recommendations and measures.

Activities during 2025

Governance

Strengthening Governance

We have strengthened the support we provide to our customers by operating within governance and compliance frameworks that promote transparency, accountability and ethical business practices. Our alignment across the Group enhances trust for our customers across our supply chain, increases resilience through supplier due diligence and risk monitoring processes, and ensures that we are collectively working to prevent and mitigate modern slavery risks. By leveraging our continuous improvement initiatives, we can provide our customers with greater confidence that their supply chain is managed responsibly and sustainably.



Internal Audit and Risk

During 2025, we continued to develop both internal audit and risk assessment processes, to provide compliance, rigour and focus within the remit of modern slavery. Our internal audit function increased the breadth and depth of the rotational on-site reviews undertaken at our sites, which assess our operations, supply chain and mitigating actions against the risk of modern slavery and human trafficking. The results of these reviews were socialised amongst other colleagues, including the Board, to ensure learnings were addressed and best practices adopted Group-wide. In 2026, we will adopt a three-year rolling plan to ensure all sites, including those newly acquired, are reviewed. In addition, we will continue to increase the depth of our reviews.

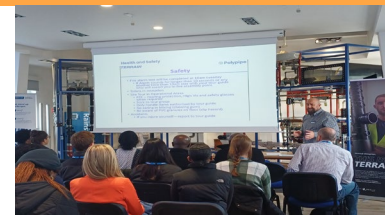
During the year we also developed a Group-wide risk assessment focused exclusively on the risk of modern slavery and human trafficking. This assessment was socialised amongst our colleagues responsible for identifying and mitigating risk in our business operations, to obtain feedback and understand its usefulness. In 2026, we will ensure those colleagues have critically assessed the identified risks, documenting and operating the relevant mitigating actions, or alternatively have developed plans and timelines to ensure mitigating actions are put in place.



Our People

Leadership Training and Awareness

The Genuit Leadership Team received Modern Slavery training during 2024. This built on previous communication and awareness for this group of colleagues and was focused particularly on the construction industry. The training also raised awareness of the risks to the business, what to look for and how to report any suspicions or evidence. Following this, in September 2025, we rolled out a mandatory 60-minute training module on modern slavery for all employees across the Group to complete, supported by the Supply Chain Sustainability School. The training was accessible via our Learning Management System and is provided in a number of different languages. The training must be completed every 2 years but will be reviewed annually. As at the date of this Statement, we have achieved 93% completions which takes into account leavers and new starters.



Your Voice

In 2025 we rolled out both a pulse engagement survey and a full engagement survey across all areas of the business within the Group. This provided all colleagues with an opportunity to give feedback on what is going well and what is not.. Our strengths overall and as a Group were very much around goal setting, peer relationships and management support, while the areas we could improve were around reward, recognition and career development. The results however can be broken down by business, by department, by function and by demographics so that any issues or areas of improvement can be tailored. This provided further support to opening channels of communication for employees and reporting lines and highlighted no areas of concern in respect of modern slavery practices.



Our People

Safe Call

This is our platform to raise issues and whistleblowing claims in a confidential and sensitive manner. During 2025, we launched the platform into our newly acquired businesses in addition to promoting the platform again in our existing businesses through posters around the office and factory floors, newsletters and through town hall meetings.



Payroll Consolidation

2025 saw the further consolidation of some of our outstanding payroll systems within the UK. This is to ensure consistency, but also to provide the capability of the Group to audit and implement consistent controls across the UK. This in turn mitigates any pay risks associated with modern slavery. 15 payrolls have now been consolidated over the last 2 years.



Bank Details Policy

We launched a new policy in 2025 with one of the main objectives to ensure all employees were being paid directly for work performed in accordance with their contract of employment. The policy clearly states that remuneration payments will only be made into a bank account in the employee's name. The policy included the required information which must be supplied, and states that a validation process must be completed for new hires and changes.



Customers

Enhanced Vendor Due Diligence Measures

We have strengthened the support we provide to our customers by operating within governance and compliance frameworks that promotes transparency, accountability and ethical business practices. Our alignment across the Group enhances trust for our customers across our supply chain, increases resilience through supplier due diligence and risk monitoring processes, and ensures that we are collectively working to prevent and mitigate modern slavery risks. By leveraging our continuous improvement initiatives, we can provide our customers with greater confidence that their supply chain is managed responsibly and sustainably.



Suppliers

Enhanced Vendor Due Diligence Measures

To strengthen our governance framework and further mitigate the risk of modern slavery within the supply chain, during the year the Procurement function implemented an enhanced vendor due diligence process. This revised approach introduced a structured two-stage assessment designed to increase transparency, strengthen oversight, and ensure suppliers met our ethical and compliance standards. As part of this enhancement, all suppliers are now required to complete a comprehensive modern slavery risk questionnaire. The questionnaire captures key information relating to labour practices, recruitment methods, workforce conditions, and the supplier's own supply chain monitoring.



On-site Audits

Following submission of the questionnaire, the Procurement function established a process whereby an on-site audit would be conducted to verify the accuracy of the supplier's responses and assess the effectiveness of their controls in practice. This verification stage provides direct insight into operational conditions and enables early identification of any potential risks or noncompliance and provides a more robust and accountable due diligence process, ensuring that modern slavery risks are systematically identified, monitored, and addressed in line with regulatory expectations and organisational values.



Recruitment Agencies Deep Dive

During 2025, we conducted a focused review of all recruitment agencies supplying temporary labour, recognising this as a high-risk area for modern slavery given temporary workers may lack knowledge of local laws, face financial vulnerability, and rely heavily on their agencies, which can increase the risk of exploitation.



Suppliers Case Studies

Seasonal worker risk assessment

Following the onboarding of one of our acquisitions, we identified that seasonal workers were being employed, prompting a comprehensive assessment to ensure no modern slavery risks were present. This included reviewing the supplying agency, which was found to be an approved sponsor under the Seasonal Worker Scheme and had held a GLAA licence since 2009. In addition, we also carried out direct checks with the workers to confirm their working conditions, pay arrangements, living conditions, and freedom of movement. Further training was also delivered to the team responsible for managing these workers to ensure ongoing compliance with the requirements of the Seasonal Worker.

Supply Chain Sustainability School Procurement Workshop

A specialist training session was conducted by the Supply Chain Sustainability School for colleagues who were involved in, or influenced, procurement decisions. The workshop provided participants with:

- Understanding the current landscape relating to modern slavery, including the global and UK legislative landscape;*
- The confidence to be able to articulate why good procurement and supply chain management is key to combatting slavery in our supply chains;*
- Insights and tips on supply chain strategies and tools to prevent, manage and mitigate the risk of modern slavery;*
- Clarity on how to identify risk in your supply chain, and why a prioritised approach is essential;*
- Tools and templates were shared.*

Genuit Group Spend Profile with Tier 1 Suppliers

With 84% of our Tier 1 spend being in the UK, this lowers the risk of modern slavery within our supply chain due to the UK having strong labour laws, regulatory oversight, and enforcement mechanisms, significantly reducing the risk of modern slavery compared with global supply chains. UK suppliers are more likely to comply with the UK Modern Slavery Act and have transparent reporting.

Greater visibility and transparency: Being geographically closer makes it easier for the Group to conduct site visits, audits, and assessments. We are able to verify working conditions directly rather than relying on overseas documentation or self-certification.

Stronger governance and accountability: UK organisations are legally required to publish modern slavery statements if they meet the turnover threshold. Contracting with UK entities gives the Group clearer legal recourse if concerns arise.

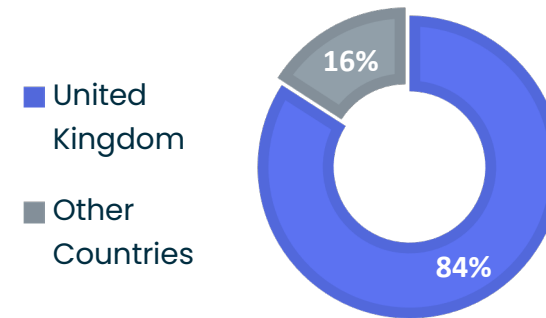
Reduced exposure to high-risk countries: Many global regions have higher prevalence of forced labour, weak enforcement, and limited inspection. With the Group sourcing locally, it reduces exposure to those high-risk geographies.

Faster issue resolution: If concerns are raised, we can engage with our UK suppliers quickly through in-person meetings, unannounced visits, or audits. Investigations and remediation actions are easier to coordinate.

More ethical and reputational assurance: Sourcing from within the UK strengthens ESG compliance and reduces our reputational risk with customers, investors, and regulators. It supports ethical business practices and aligns with stakeholder expectations.

Easier to implement supplier improvement plans: When suppliers are located nearby, it is easier for us to collaborate on corrective actions, capability building, and long-term ethical performance.

UK vs Other Countries Spend %



Analysing our key expenditures with primary supply partners

UK supplier dominance: The United Kingdom accounts for 84.1% of our Tier 1 supplier spend, showing high reliance on domestic suppliers.

Secondary country contributions: Germany, UAE, Ireland, Italy, and the Netherlands contribute small but strategic shares, supporting niche capabilities.

Risk and diversification insights: Concentration risk exists due to UK dominance, but smaller contributors offer diversification and niche sourcing benefits.

Priorities for 2026

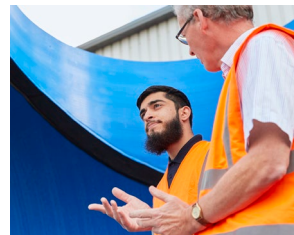
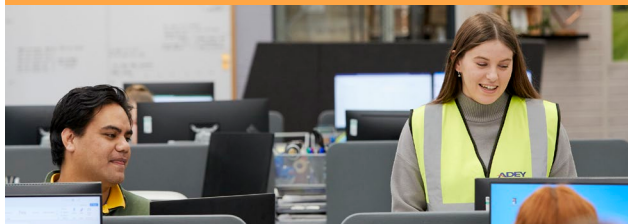


People Awareness

We will continue to strengthen people awareness on all matters related to modern slavery, human trafficking and anti-slavery. Our new communication platform, Viva Engage, allows us for the first time to reach every colleague across the Group, regardless of their role or location. We intend to use this platform in addition to posters and newsletters to continue to inform all our colleagues of the risk and how to report any suspicions. We will also ensure we support campaigns such as Anti-Slavery week, to bring the relevant topics to life.

Knowledge Centre and Toolkit

To provide more practical support across the Group, we are establishing a central SharePoint hub that will be accessible to all managers and employees and will be launched in Q3 2026. The hub will act as a single point of reference, providing clear visibility of key information, resources, and guidance. It will include a dedicated toolkit for both employees and managers, offering practical support, guidance, and materials to help navigate conversations, access support, and promote understanding across teams. Creating this shared space is important to ensure consistency, transparency, and accessibility of information across the Group, while reinforcing our commitment to supporting our people and fostering an informed, inclusive, and supportive workplace culture.



Supply Chain Sustainability School

Procurement will continue to collaborate with the Supply Chain Sustainability School and other external organisations to continue learning and sharing best practices in how to identify and eradicate modern slavery in the supply chain.

Payroll

During 2026, we are transitioning from our current payroll systems to Workday Payroll for all UK colleagues. This will enable us to have one single source of truth for all our people related data. Absence and holidays will be tracked more accurately, and all training records (including modern slavery training) will be held in one place, allowing more real time, accurate reporting.



Priorities for 2026



Bank Details Policy

During 2026, we will continue to monitor the effectiveness of the policy launched in 2025 and following the implementation of Workday Payroll, we will be able to more easily audit the bank details held for colleagues to ensure they are being conducted in accordance with policy. We will also ensure that the validation process introduced in 2025 is effective and fully documented.

Training

To build on the training already rolled out to all employees across the Group, we plan to create and use a series of short film clips to bring the issue of modern slavery and human trafficking in construction to life. This series will be rolled out to all employees, with a reminder of what to look for and what to do if they have any suspicions.



Customer Support

We are developing a structured framework to better support our customers in understanding and meeting their modern slavery obligations. This framework will enable us to provide consistent guidance and responses across the Group, ensuring customers receive clear and aligned support when raising questions or seeking advice. By establishing shared resources and best-practice guidance, we aim to strengthen awareness, support effective due diligence, and work collaboratively with our customers to promote responsible and ethical business practices.

Policy Review

The Group's Modern Slavery & Human Trafficking Policy, Ethics and Code of Conduct Policy and Human Rights Policy will be reviewed and amended accordingly, including being updated with our new vision and principles.



Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Act.

The Board approved this statement on behalf of the Genuit Group on: **22 May 2026.**

Signed for on behalf of Genuit Group.



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