



# MODERN SLAVERY STATEMENT

2023

**CONNECTING  
THE FUTURE**

## ABOUT THIS STATEMENT

Establishing our commitment



### What is Modern Slavery?

*Modern Slavery is a crime and a violation of human rights which, under the Act, includes eight types of serious exploitation:*

- *trafficking in persons;*
- *slavery;*
- *servitude;*
- *forced marriage;*
- *forced labour;*
- *debt bondage;*
- *deceptive recruiting for labour or services; and*
- *child slavery including situations where children are subjected to practices similar to slavery or being engaged in hazardous work.*

This statement is published on behalf of GenusPlus Group Ltd and its reporting entities (including Genus Infrastructure Pty Ltd, Genus Services Pty Ltd, Proton Power Pty Ltd, KEC Power Pty Ltd, Genus Infrastructure (Qld) Pty Ltd, Genus Infrastructure (NSW) Pty Ltd, Connect Infrastructure Pty Ltd and Genus PFA Pty Ltd) which operate throughout Australia (collectively referred to as "GNP" or "Genus") pursuant to the requirements of the Modern Slavery Act 2018 ("the Act"); to report on the actions taken to assess and address Modern Slavery risk exposures in Genus' operations and supply chain during the financial year ended 30 June 2023 ("the period").

It describes the steps Genus has taken to assess and combat Modern Slavery risks within our operations and supply chains, and the actions being taken to address these risks.

Genus' Modern Slavery Policy sets out our commitment to ensuring Modern Slavery is not enabled or present within our operations and supply chains.

Genus considers human rights a core value and aims to protect and uphold fundamental human rights at all its operations and projects by requiring its employees and all its stakeholders (including suppliers, subcontractors, and customers) to conduct themselves and their work and businesses with due care in accordance with relevant laws and regulations.

Our Modern Slavery Policy is supported by our [Code of Conduct](#) and our [Anti-Bribery and Corruption Policy](#).

Genus also has a [Whistleblower Policy](#) which encourages the reporting of any actual or suspected unethical, unlawful, or undesirable conduct and provides a mechanism to ensure that such matters are dealt with appropriately while offering protection to the individuals reporting the misconduct.

Copies of these policies can be found on our website at [www.genus.com.au](http://www.genus.com.au)

## MESSAGE FROM THE MANAGING DIRECTOR

David Riches, Managing Director & CEO



*Genus values and prioritises human rights and is committed to creating a safe and ethical workplace and supply chain.*

I believe that as a business, we must do everything we can to mitigate the risk of Modern Slavery; this also aligns with our core value of protecting human rights. Genus values and prioritises human rights and is committed to creating a safe and ethical workplace and supply chain.

I acknowledge the seriousness of the issue of Modern Slavery and believe that we must take all necessary steps to prevent it from occurring in our operations and supply chains.

Our zero-tolerance approach to Modern Slavery includes compliance with all relevant applicable laws; adherence to country-specific labour laws; regular monitoring and reporting of our progress and assessments; and notifying the Commonwealth as required of any Modern Slavery breaches in our supply chain and operations when we become aware of them.

We believe that communication and awareness are crucial in preventing Modern Slavery, and we will ensure that our employees receive proper training and education on recognising and addressing potential risks. In addition, our contractors and suppliers will be carefully vetted to ensure that they share our commitment to eliminating Modern Slavery.

I understand that addressing Modern Slavery is an ongoing effort and we will continue to stay informed about industry and international best practices. At Genus, we are dedicated to making a positive impact in protecting human rights and not allowing or enabling Modern Slavery; and we believe that together, we can make a difference.

## ABOUT GENUS

Operations, Structure, Governance,  
Value Chain & Supply Locations



## OPERATIONS



Genus is a publicly-listed company on the Australian Securities Exchange that specialises in providing end-to-end services for essential power and telecommunications infrastructure.

Our integrated service offering caters to customers in the power, utilities, resources, and telecommunications sectors throughout Australia. GNP's head office is in Perth, and it has offices spanning the country, generating \$444 million in revenue for the year ending 30 June 2023, with a current workforce of ~835 employees, making it subject to the Australian Modern Slavery legislation.

All of Genus' projects were undertaken within Australia during the period and primarily focused on three core sectors: mining, utilities, and commercial registered businesses. Genus utilises a direct employment model that adheres to relevant modern awards or enterprise agreements. In some cases, local labour hire was also used at market rates to supplement the direct workforce.

Certain project scopes were subcontracted by GNP to third parties during the reporting period. All subcontractors used were Australian-based and engaged under industry standard terms and conditions. GNP's supply chains include the procurement of products such as PPE, vehicles, poles, conductors, cables, and other equipment necessary for project delivery. The majority of products used by GNP during the period were procured directly from Australian wholesalers.



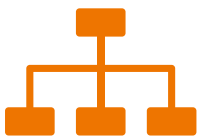


# ABOUT GENUS

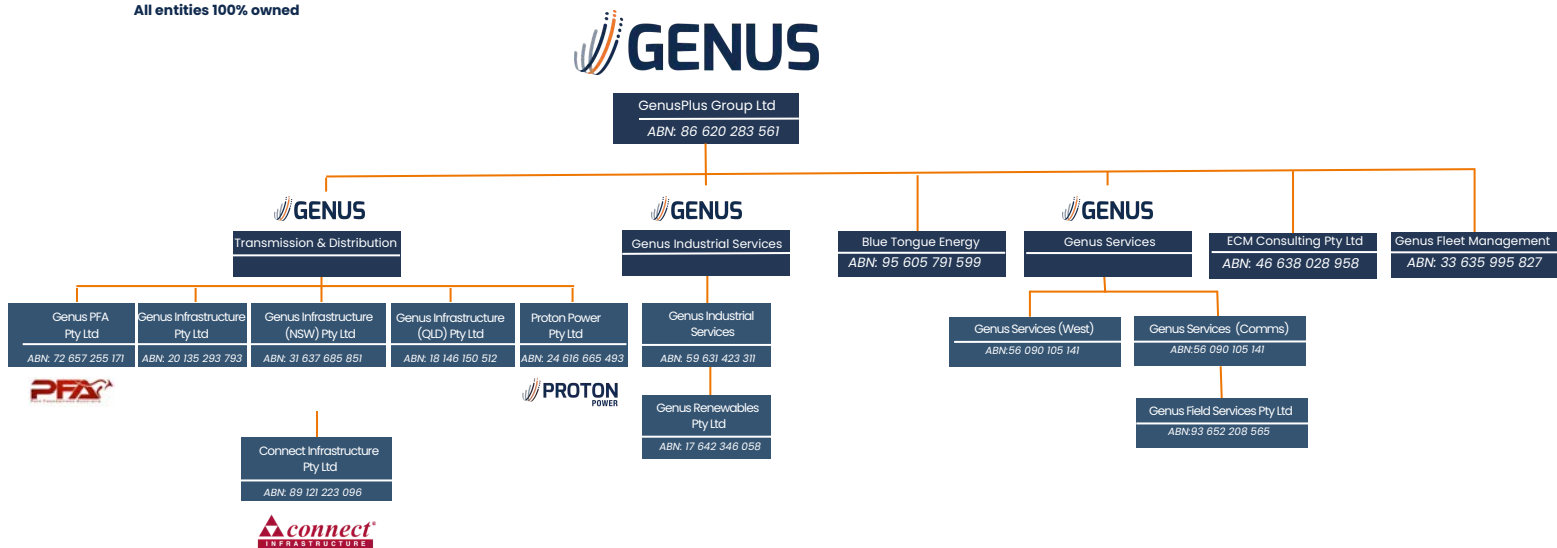
Operations, Structure, Governance, Value Chain & Supply Locations



# STRUCTURE



All entities 100% owned



## ABOUT GENUS

Operations, Structure, Governance,  
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## GOVERNANCE



The Audit & Risk Committee is responsible for ensuring GNP's compliance with all relevant laws, regulations and company policies.

This includes compliance with the Modern Slavery Policy, and the identification and management of risks related to GNP's business and our economic, environmental, and social sustainability.

## VALUE CHAIN



At Genus, our unwavering commitment to safety, health, environment, and the quality of our services is evident in everything we do. Our SHEQ (Safety, Health, Environment, and Quality) policies and procedures are fully integrated into our operations, ensuring that our services are delivered to the highest standard while minimising environmental impact.

We are dedicated to promoting the health, safety, and wellbeing of all our employees and subcontractors at work, as well as safeguarding the environment in which we operate. Our top priority is to ensure the safety of everyone impacted by our work, including our employees, subcontractors, and the public. This is encapsulated in our motto: **"Think Safe. Work Safe. Home Safe."**

Think Safe. Work Safe. Home Safe.

To effectively manage our SHEQ obligations, GNP has established and implemented an integrated management system certified to ISO 9001, 45001 & 14001. This system provides a comprehensive framework for managing safety, health, environmental, and quality matters ensuring that we maintain the highest standards across all aspects of our operations.

## ABOUT GENUS

Operations, Structure, Governance,  
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## SUPPLY LOCATIONS



*Through developing strong, effective client relationships we create smart & integrated solutions that bring visions to life.*

*We are proud of our excellent track record in delivering successful, results driven projects. We focus on clients who seek purpose-driven and innovative solutions that offer exceptional value - without compromising on quality.*

## OUR APPROACH

Awareness & Prevention; Policies & Procedures



## AWARENESS & PREVENTION



### Employees

All employees within GNP have access to the policies and procedures that are relevant to Modern Slavery. Employees who are involved in parts of the business which may have exposure to Modern Slavery risks or who are best placed to identify and manage Modern Slavery risks will be required to undertake specific Modern Slavery Training to be put in place during FY2024.

### External

GNP is reviewing and tightening its processes and procedures, and will ensure external parties are aware of its zero-tolerance approach to Modern Slavery; and require suppliers and contractors to comply with and provide appropriate confirmations relating to their compliance with Modern Slavery requirements.

### Procurement

GNP's procurement team will be required to undertake specific Modern Slavery training to ensure their awareness of the relevant requirements, and their ability to communicate with external entities and counterparties regarding these requirements. GNP has a procurement checklist in place which has been amended to include a requirement for suppliers to advise whether their organisation and supply chain comply with Modern Slavery legislative requirements, with the amended checklist to be implemented in FY2024.



## OUR APPROACH

Awareness & Prevention; Policies & Procedures



## POLICIES & PROCEDURES



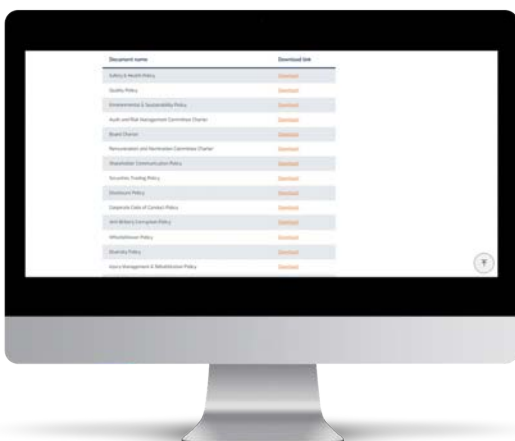
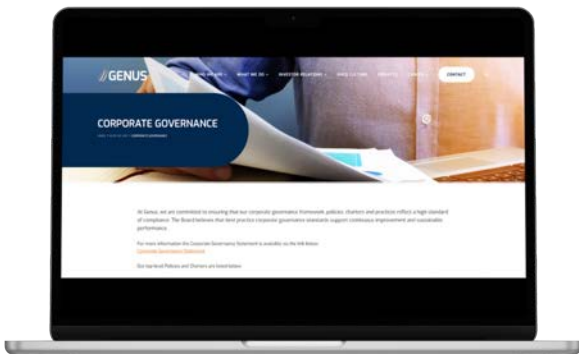
### Policies

GNP has a number of governance policies on our website which are regularly reviewed and revised as required, and which assist GNP in advancing its commitment to ensure compliance with the Act and in enhancing and developing a culture within the company which promotes good values and human rights. The policies are aimed at ensuring that the highest standards are maintained within the company, including promoting correct behaviours and addressing the risk of Modern Slavery.

### Procedures

GNP has reviewed and made amendments to the following procedures to include specific requirements aimed at identifying and combatting modern slavery within GNP and its supply chains, with the amended documents to be implemented in FY2024:

- Procurement & Logistics Procedure
- Contract Review Checklist
- Supplier and Subcontractor Prequalification Form
- Pre-Contracts Manual
- Pre-contracts Management - Commercial Procedure



[genus.com.au/who-we-are/corporate-governance](https://genus.com.au/who-we-are/corporate-governance)

## ASSESSING OUR EFFECTIVENESS

Consultation & Looking Ahead



### CONSULTATION



Genus has consulted with its subsidiaries by meeting with the senior management within its businesses, including representatives from Genus and the businesses in its operating segments of Communications, Infrastructure, and Industrial Services. Discussions included the requirements relating to modern slavery, awareness of the occurrence of any potential or identified modern slavery issues, and commitments going forward.

In FY2024, Genus aims to consult further with relevant internal stakeholders and with external stakeholders to further develop its Modern Slavery commitments.

### LOOKING AHEAD



To strengthen our commitment to combatting modern slavery, GNP will implement the following measures:

- Conducting thorough due diligence on suppliers before engaging with them, including robust assessments of modern slavery risks.
- Incorporating human rights and modern slavery commitments into our purchasing and subcontracting agreements when engaging with suppliers and subcontractors.
- Providing modern slavery specific training to relevant employees to enhance their understanding of modern slavery risks and requirements of Modern Slavery legislation.
- Staying informed about developments in industry and international best practice related to modern slavery.
- Management will report any incidents or allegations of Modern Slavery that are identified or disclosed during the year, including those within GNP's supply chain, to the Board.

The GNP Board of Directors authorised and approved the publication of this Statement on 21 August 2023.



**DAVID RICHES**  
MANAGING DIRECTOR