



MODERN SLAVERY STATEMENT

2024

**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 ("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 its operations and supply chain during the financial year ended 30 June 2024 ("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 its 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

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 mateship and looking out one another. Genus values and prioritises human rights and is committed to creating a safe and ethical workplace and supply chain.

I acknowledge the seriousness 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 if/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.

Combatting Modern Slavery is an ongoing effort and we endeavor to stay educated about industry and international best practices. If everyone does their part, we will create change.

This Statement was approved by the boards of each of the three reporting entities covered by this statement. The Board of GenusPlus Group Ltd approved this statement on 29 November 2024, and the Boards of Genus Infrastructure Pty Ltd and KEC Power Pty Ltd approved this statement on 19 December 2024.

A handwritten signature in dark ink, reading "D. Riches".

David Riches
Managing Director

FY24 HIGHLIGHTS

What we achieved in relation to Modern Slavery in FY24



Updated our Modern Slavery Policy



Piloted our Supplier/Contractor Questionnaire



Launched our employee Modern Slavery Awareness Training



Commenced initial due diligence on some of our top suppliers

ABOUT GENUS



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. Genus' headoffice is in Perth, and it has offices spanning the country, generating \$551 million in revenue for the year ending 30 June 2024, with a current workforce of around 1,178 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.

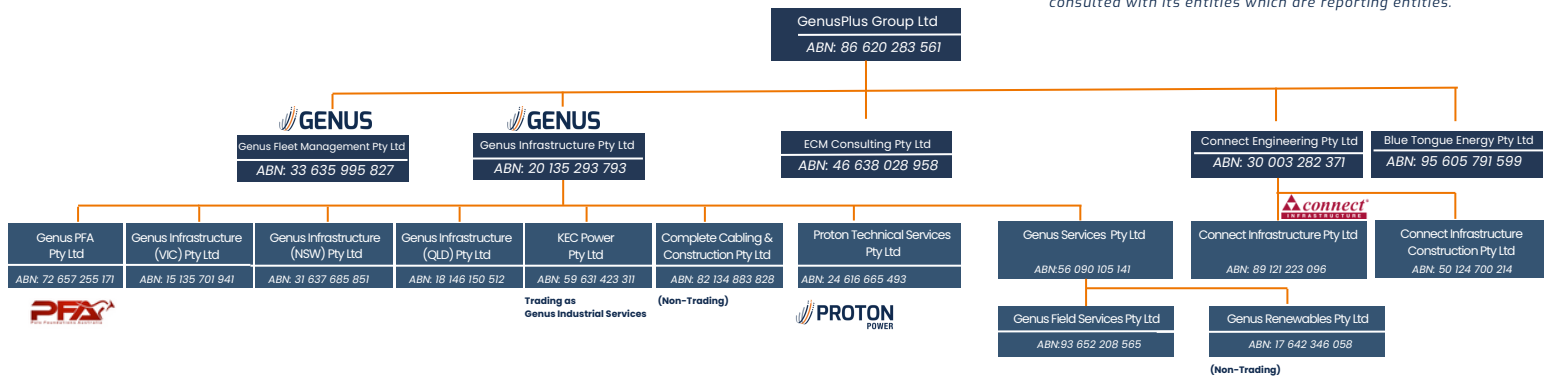


OUR STRUCTURE

All entities 100% owned



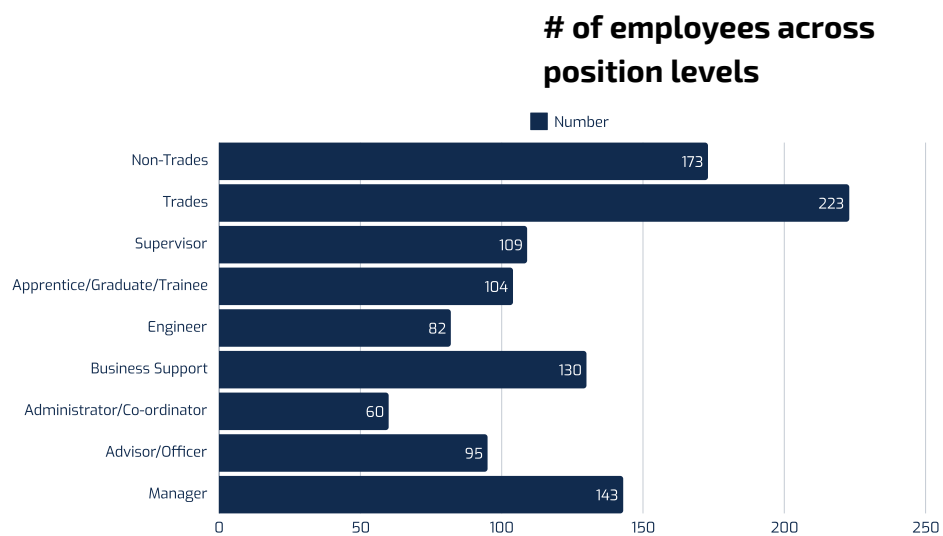
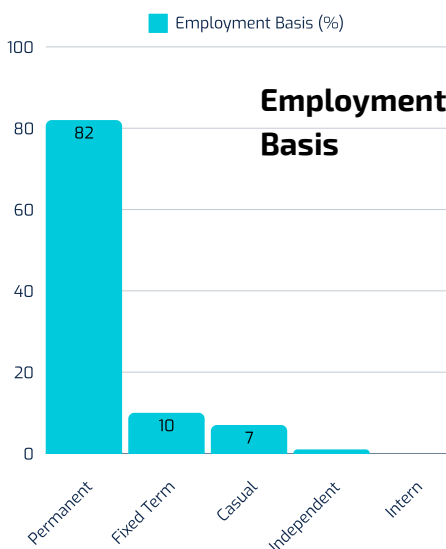
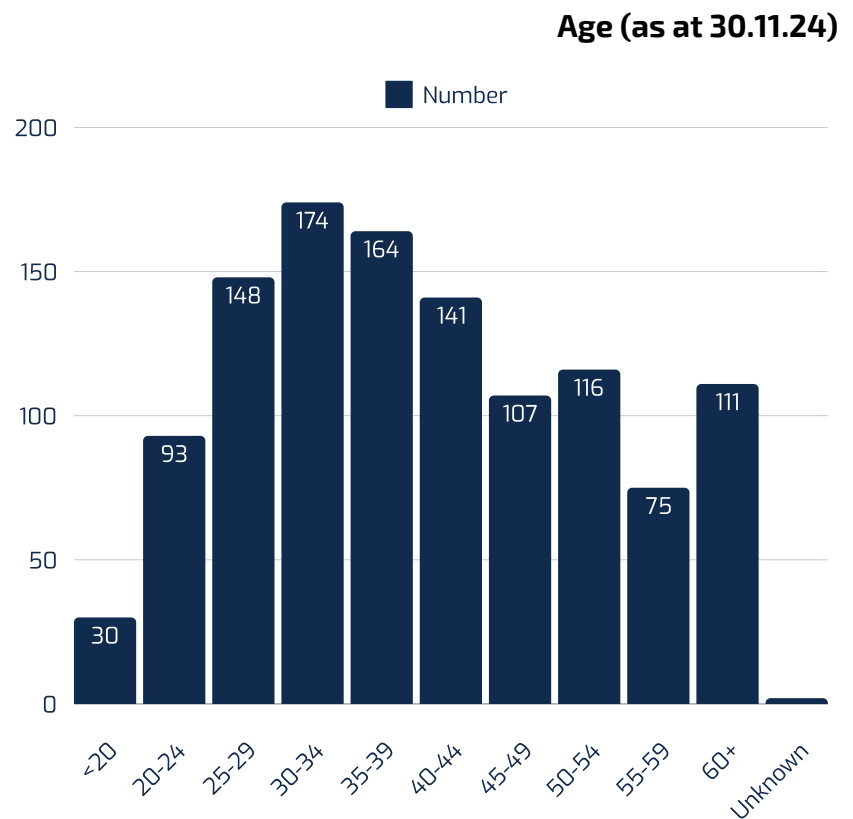
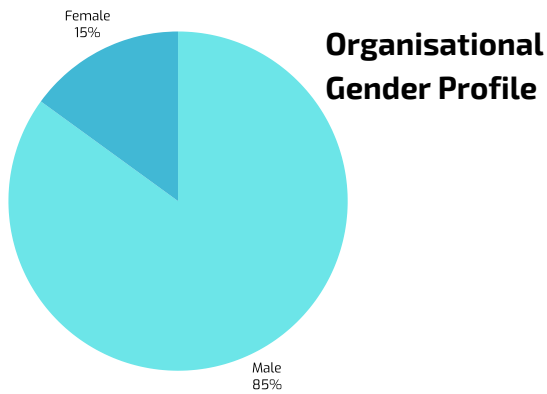
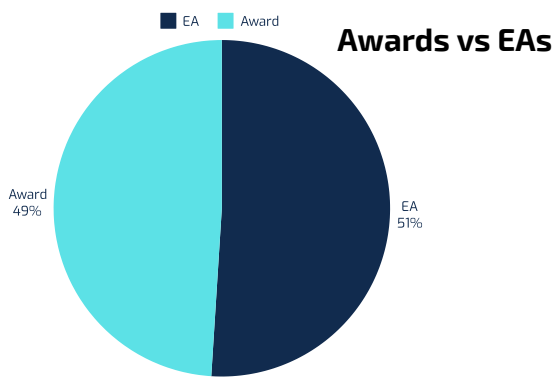
NOTE: This Modern Slavery Statement encompasses all our 100% owned entities. The practices, policies and procedures referred to in this Statement apply to and are used within all the Genus entities. In preparing this Statement, GNP engaged and consulted with its entities which are reporting entities.



Entity	Number of employees	Operational activities
Genus Fleet Management	21	Fleet Management Services
Genus Infrastructure WA	416	Transmission & Distribution Infrastructure
Proton Power	77	HV Testing, Commissioning & Asset Maintenance
Genus Infrastructure VIC	28	Transmission & Distribution Infrastructure
GenusPlus Group	57	Corporate Management
Genus Services	71	Communications Infrastructure
Pole Foundations Australia	66	Pole Reinforcement & Maintenance Services
CommTel	151	Communications Infrastructure
Genus Industrial Services	168	Electrical & Instrumentation
Genus Infrastructure NSW	71	Transmission & Distribution Infrastructure
Genus Infrastructure QLD	54	Transmission & Distribution Infrastructure

Total Employees:
1178

EMPLOYEE INFORMATION



OUR VALUES

What guides our decisions



Our core values guide us and are reflected in our actions and approaches to decisions in business. This extends to how we are doing our part in combatting Modern Slavery.



INNOVATION

We strive to learn, improve and seek out solutions that create value.



MATESHIP

We look out for each other and treat one another equally and with respect.



SAFETY

We embody "Think Safe. Work Safe. Home Safe."



INTEGRITY

We are honest, transparent and we do what we say we will do.



COLLABORATION

We believe in the power of working together to achieve success.

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."

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.

Think Safe. Work Safe. Home Safe.

OUR OPERATIONS

Supply Locations, Supply Chain and Risks



SUPPLY LOCATIONS



OUR OPERATIONS

Supply Locations, Supply Chain and Risks



OUR SUPPLY CHAIN

International Suppliers

We are currently mapping our supply chain to better identify both major and minor risks. While 99% of our supplies were obtained from suppliers within Australia, we do engage with overseas suppliers for specialised parts and supplies. We consider ourselves at a low risk of being exposed to Modern Slavery because of this, however, we have and will continue to strengthen our awareness and due diligence within our supply chain.

Our suppliers outside of Australia are based in the United States, China and Europe. The total expenditure on international suppliers was approximately \$2.5 million in FY2024.



Approximately \$2.5 million spend on international suppliers in FY2024

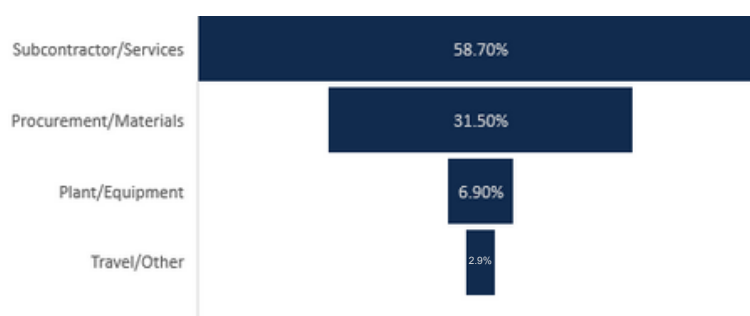


Top 3 source countries / regions - America, Europe and China



Less than 1% of total expenditure on international suppliers

Top procurement areas for our top 100 vendors



OUR OPERATIONS

Supply Locations, Supply Chain and Risks



SUPPLY CHAIN RISKS

We acknowledge that Modern Slavery can potentially occur in some areas of our supply chain and business. We have procedures and policies in place to help mitigate this risk and intend to consider additional processes which may assist us to improve our management of this risk.

High Risk Categories	Our Understanding
Electrical Supplies	We procure a variety of electronic devices, including computers and mobile phones, as well as electrical equipment such as cables and powerlines. The electronics and electrical sectors are known for their high risk of labor exploitation. Manufacturing frequently takes place in regions with minimal regulation and oversight, often involving lower-skilled labor. Additionally, there is a significant risk that the raw materials used in these products are sourced from environments where workers endure conditions akin to Modern Slavery. 99% of our supplies were obtained through Australian suppliers, reducing but not eliminating the risk of Modern Slavery. We aim to continue to improve our supply chain due diligence.
Construction	The construction industry often entails extensive supply chains and relies on low-skilled, low-paid manual labor, which can increase the risk of Modern Slavery. Materials and products used in construction are frequently obtained from suppliers beyond direct relationship, particularly in high-risk countries. We only construct within Australia with contractors who are based in Australia which makes our risk considerably lower than in other regions. However, we aim to ensure that those we engage with on our projects also comply with Modern Slavery safe practices.
Labour Hire	Temporary work is more susceptible to Modern Slavery because of its transient nature, the higher proportion of migrant workers, and intense competition, with employers under pressure to cut costs. These conditions can encourage the adoption of exploitative labor practices. While we do utilise some labour hire (FY2024 spend of approximately \$13 million), the labour is procured through established Australian businesses and is in accordance with all relevant laws and legislation. We have some personnel working for us under Temporary Skill Shortage visas. These personnel are employed under the same terms and conditions as other employees, we do not retain their original documentation, and they are free to discontinue their employment and leave if they choose to do so.
Cleaning and Security	We source cleaning for our sites, as well as cleaning and security services for our leased office spaces. These sectors are highly susceptible to Modern Slavery, even in Australia, due to the prevalence of low-skilled, low-paid manual labor and the high number of short-term, seasonal, and migrant workers, along with subcontracting practices. In our leased office spaces, cleaning and security is managed by the relevant building manager. For the remote sites we work on, we engage with Australian based contractors for cleaning. While this reduces the risk, we intend to undertake further due diligence in this area to ensure that those contractors are adhering to necessary laws and regulations.

OUR APPROACH

An overview



Corporate Governance Statement

At Genus, we are committed to maintaining governance structures that uphold our dedication to ethical and sustainable business practices. Our governance framework includes our updated 2024 Corporate Governance Statement, designed to ensure transparency, accountability, and effective governance across all levels of the organisation.

Audit & Risk Committee

The Audit & Risk Committee has oversight of Genus' risk management and governance. It is tasked with ensuring that Genus complies with all relevant laws, regulations, and company policies, and its oversight extends to economic, environmental, and social sustainability. The Committee also monitors Genus' adherence to the Modern Slavery Policy, identifying and managing risks associated with human rights across our operations.

Due Diligence and Risk Management

We recognise that risks of Modern Slavery could arise in our supply chain and operations, and we are committed to meeting our obligations through ensuring awareness of this risk and ongoing review and adaptation of our procedures and policies if required. While we are in the process of further developing our due diligence processes, we have already taken steps to identify areas where there may be risks of exploitation, improving employee awareness through training, and including modern slavery requirements in our contracts.

Human Rights Awareness

Compliance with Genus' Modern Slavery Policy is an important component of our approach to governance. While our frameworks are evolving, we strive to align our practices with applicable national and international standards. We are committed to ensuring our business practices reflect our values and meet regulatory expectations. Our ongoing efforts include reviewing relevant policies, such as our Code of Conduct, offering Mateship Training & Modern Slavery Training, and fostering awareness within our organisation to improve our ability to safeguard human rights and address Modern Slavery risks where they may arise.



OUR APPROACH

Policies & Procedures



POLICIES & PROCEDURES



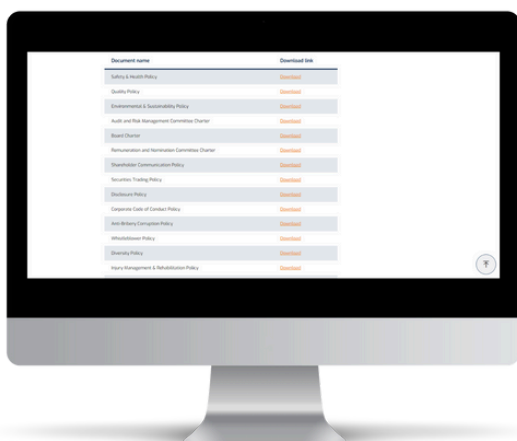
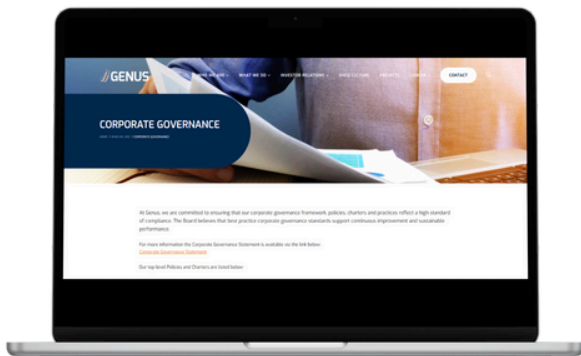
Policies

GNP has several governance policies on its website which are regularly reviewed and revised as required, and which assist Genus 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 implemented the following procedures to include specific requirements aimed at identifying and combatting Modern Slavery within GNP and its supply chains:

- Procurement & Logistics Procedure
- Contract Review Checklist Modern Slavery Requirement
- Supplier and Subcontractor Prequalification Form
- Pre-Contracts Manual
- Pre-contracts Management - Commercial Procedure
- In FY25, we will roll out new procedures that focus on supplier due diligence and supply chain management.



genus.com.au/who-we-are/corporate-governance

OUR APPROACH

Overview of documents



DOCUMENTS

Document	Overview of Document	How it works
Code of Conduct	Genus's Code of Conduct outlines the core standards of ethical behavior expected from employees, ensuring all business activities align with principles of integrity, respect, and social responsibility, including human rights.	The Code mandates compliance with ethical standards across all areas of operation, rejecting practices like Modern Slavery. All employees are required to agree to the Code as a condition of employment, and it's reinforced through onboarding.
Procurement & Logistics Policy (Internal)	Genus's Procurement Policy sets out guidelines to ensure all purchasing and supplier engagement follows ethical, transparent, and value-driven processes.	The policy serves to ensure that all procured goods can be safely installed, comply with statutory and regulatory requirements, comply with codes and standards, and are of an appropriate level of environmental neutrality.
Whistleblower Policy	Genus's Whistleblower Policy provides a confidential and secure channel for employees, contractors, and third parties to report unethical conduct, violations of policy, or illegal activities without fear of reprisal.	The policy encourages a culture of transparency by protecting individuals who come forward with concerns. Reports are investigated by an independent party, with findings reviewed by leadership to address any identified risks or non-compliance.
Grievance & Conflict Resolution Procedure (internal)	The Procedure offers a structured process for employees to raise concerns about workplace issues, unfair treatment, or violations of Genus policies, ensuring all grievances are handled fairly and promptly.	Employees can submit grievances through our designated HR channel. An assigned team reviews and investigates each grievance, aiming to resolve issues while ensuring the complainant's confidentiality and protection against retaliation.
Modern Slavery Policy	Genus's Modern Slavery Policy formalises its commitment to combatting Modern Slavery in its operations and supply chains, outlining the company's standards, preventative measures, and response strategies.	This policy sets out Genus' requirements for its employees, counterparties and stakeholders to the requirements of the Modern Slavery Act. It demonstrates our zero-tolerance approach to comply with Modern Slavery legislation, and sets out its requirements relating to the prevention and detection of any potential Modern Slavery exposure in Genus' business or supply chain.

OUR APPROACH

Addressing our risks through awareness & prevention



AWARENESS & PREVENTION



513 Employees have completed the Genus Modern Slavery Awareness Training since roll out commenced in March 2024

Employees

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 are required to complete Genus' Modern Slavery Training. A Modern Slavery Refresher Course for employees to complete every two years is also being developed.

We are also in the process of developing and rolling out internal guides for employees to use when undertaking risk assessments and determining the appropriate level of due diligence to be undertaken on suppliers.

External

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

In 2024 we have sent our Modern Slavery Supplier Confirmation Questionnaire to our top 20 suppliers to complete, and intend to expand this to other suppliers following further consideration of our suppliers using a risk-based approach.

OUR APPROACH

Supply Chain Due Diligence



Our approach to combatting Modern Slavery doesn't stop at our awareness and prevention but also extends to due diligence of our supply chain. This is an on-going effort, and we are looking to expand our due diligence even further.

Supplier Screening and Onboarding

To promote responsible practices within our supply chain, our suppliers are required to complete our ethical sourcing module as part of on-boarding which we will amend to include Modern Slavery compliance requirements. Looking forward we are intending to develop a more advanced system to screen suppliers and contractors which will be based on requiring medium and high-risk suppliers and contractors to complete our Modern Slavery Supplier Questionnaire, while suppliers assessed as lower risk to be required to complete a declaration form confirming compliance with the Act. The overall risk will be considered based on factors such as the country of origin of supplies, revenue, number of employees, areas of operation, and services being provided.

Risk Assessment

Our risk assessment will form part of the above screening and on-boarding, with a new Modern Slavery Supply Chain Procedure setting out a procedure for the evaluation of suppliers based on several key criteria, including country risk, industry risk, supplier size, and the level of spend associated with the supplier. This procedure will help us identify areas with potentially higher risks of Modern Slavery, enabling us to focus our monitoring and mitigation efforts effectively.

Supply Chain Mapping

We are working on mapping our supply chain, starting with our direct suppliers and with the intention of expanding this further down the supply chain. Our goal is to achieve greater visibility and accountability, which may involve audits and on-site human rights assessments in the future as we strengthen our oversight of supply chain practices.

Supplier Monitoring and Ongoing Declarations

We intend to implement a requirement for all suppliers deemed to be high risk to submit an annual declaration confirming compliance with the Act and our relevant policies and standards. This annual declaration process should assist us to monitor adherence and identify any potential issues that may require further investigation.

Training, Awareness, and Supplier Engagement

We recognise the importance of education and awareness, both within our organisation and among our suppliers. We have created our Modern Slavery Awareness Training for employees to ensure they are aware of, and up to date with, the potential risks. We will take this further by developing a refresher course for those who have completed the initial training, with the refresher training to be completed every two years.

Whistleblower Policy

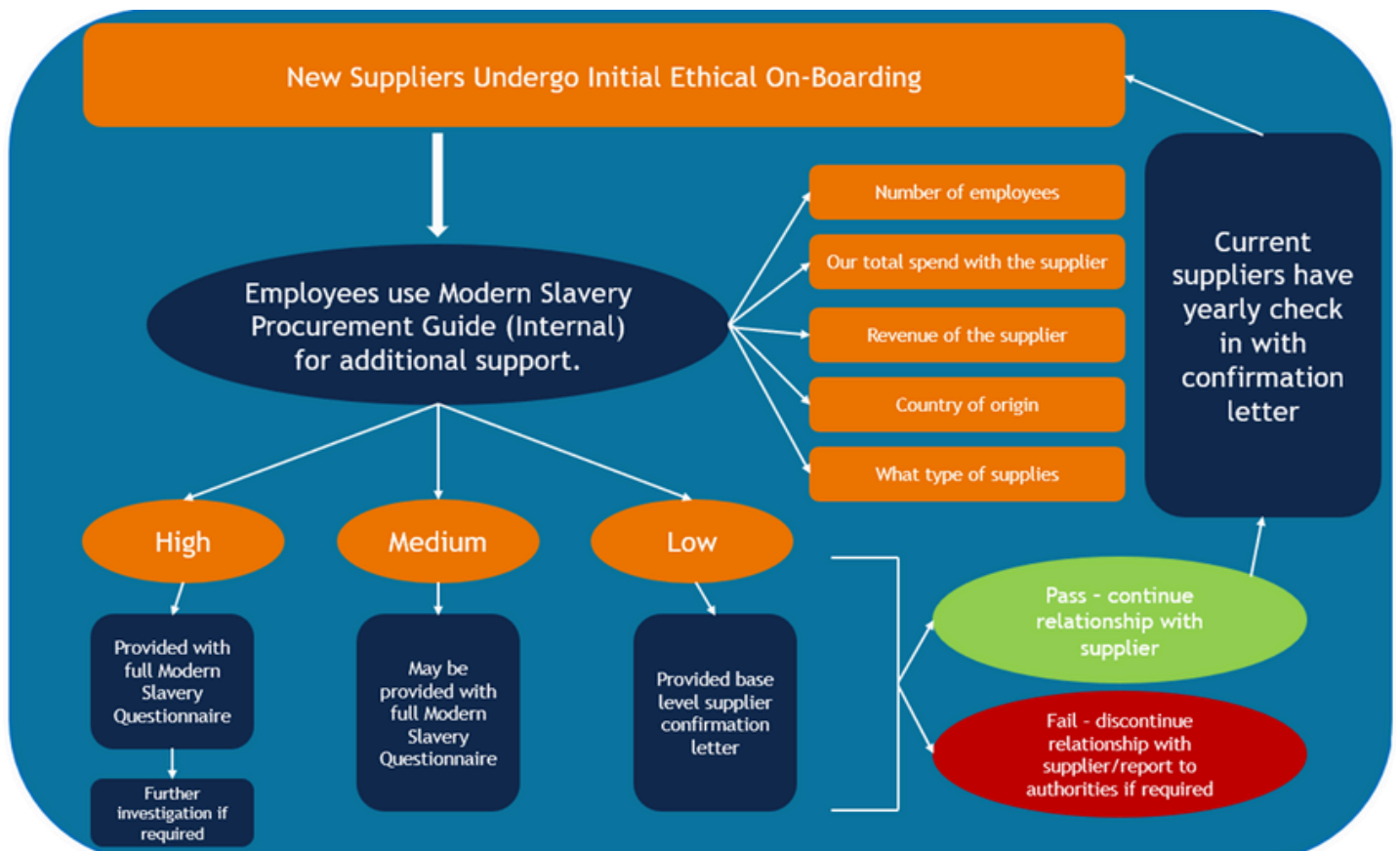
Genus provides channels for reporting concerns and remedying issues that may arise. Our Whistleblower Policy allows for confidential reporting of any suspected unethical practices, which will enable us to respond promptly to potential risks within our supply chain.

OUR APPROACH

Supply Chain Due Diligence



Below is a flow chart to be used as an internal guide in relation to supplier due diligence which will be included in a new Modern Slavery Supply Chain Procedure



ASSESSING OUR EFFECTIVENESS

Consultation & Looking Ahead



CONSULTATION



In FY2025, Genus aims to consult additional internal and relevant external stakeholders to further develop its Modern Slavery commitments.

LOOKING AHEAD



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

- Continuing to develop and expand our due diligence on suppliers (see Our Supply Chain Due Diligence Approach above).
- Reviewing our purchasing and subcontracting agreements to ensure the inclusion of human rights and Modern Slavery commitments.
- Continuing with the roll-out of our Modern Slavery training to all employees, and developing a refresher training course for employees to complete every two years
- Staying informed about developments in industry and international best practice related to Modern Slavery and making changes to our approach and documentation if necessary.

ASSESSING OUR EFFECTIVENESS

Consultation & looking ahead



KEY PERFORMANCE INDICATORS

During this reporting period, we focused on gaining a deeper understanding of Modern Slavery risks within our operations and supply chains. We recognise that identifying and addressing these risks is an ongoing and evolving process. While we are still in the early stages of this and unable to fully assess the effectiveness of the measures undertaken so far, we remain committed to building frameworks and processes to review and evaluate our actions. To support this commitment, we have established annual goals to help measure our progress and refine our approach, ensuring continuous improvement in assessing and mitigating Modern Slavery risks.

Key Performance Indicators	As at 30 June 2024	Target for FY25	Comments
Percentage of employees who have completed the Modern Slavery Awareness Training	48.3%	80%	See Our Approach on page 16
Number of identified Modern Slavery incidences	0	0	
Number of human rights related grievances (including Modern Slavery) reported	0	0	
Number of suppliers to have completed the Supplier Confirmations / Questionnaires	13	40	



Disclaimer:

This statement may contain "forward-looking statements." Words that indicate such statements include, but are not limited to, terms like "aim," "intend," "aspire," "project," "anticipate," "estimate," "plan," "expect," "may," "will," "forecast," "likely," "target," and similar expressions.

Any forward-looking statements within this document reflect Genus's expectations as of the date of publication. These statements are subject to inherent uncertainties and risks that may result in outcomes that differ significantly from those expressed or implied. Forward-looking statements are based on assumptions about Genus's current and future strategies, as well as the business environment in which we anticipate operating. They also reflect management's current assessments, judgments, and information available at the time of this statement's preparation. Actual results or future events may vary significantly due to various known and unknown risks, including shifts in market dynamics and regulatory changes.

Genus advises caution in placing undue reliance on these statements. Readers should rely on their own independent research, analyses, and professional advice concerning the information presented here. Genus makes no representation, warranty, or assurance, express or implied, regarding the accuracy or realisation of any forward-looking statements or anticipated outcomes.

Except as required by applicable regulations or law, Genus undertakes no obligation to publicly update or revise any forward-looking statements, whether due to new information, future events, or otherwise. Past performance is not an indicator of future results.

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