

Executive Summary

RE:GEN Group Ltd (“RE:GEN”) is committed to conducting its business ethically, responsibly, and in full compliance with the Modern Slavery Act 2015. This statement outlines the steps we have taken during the financial year ending 31 March 2025 to prevent modern slavery and human trafficking within our operations and supply chains. It reflects our ongoing commitment to upholding human rights, promoting fair employment practices, and working collaboratively with our partners, suppliers, and stakeholders to eliminate all forms of forced and exploitative labour.

Introduction from the RE:GEN Group CEO

RE:GEN Group Ltd (**RE:GEN**) is a construction and regeneration business operating in the North of England. We specialise in the refurbishment and regeneration of social housing and the delivery of ancillary services. Our operations are primarily undertaken through public procuring processes and directly awarded contracts from local authorities or registered social housing providers.

The Group comprises six wholly owned subsidiary companies, all under the immediate and ultimate control of RE:GEN. Our governance structure includes a statutory Board which delegates operational oversight and strategic delivery to the Executive Board (the “**Executive Board**”). The Executive Board reports directly to the statutory Board and ensures that all Group companies operate under consistent policies and governance standards.

The Group has seen continued growth throughout FY24/25 with a reported turnover of £90m. Expansion into a new region (RE:GEN Yorkshire and East Midlands Limited) along with a growing order book for the existing Group entities has driven recruitment in both administrative and operational roles. As at end of FY24/25 the RE:GEN Group employed 277 people comprising permanent, temporary, full and part-time employees.

The centralised control of RE:GEN over its Group companies has ensured a consistent approach to recruitment processes and procedures. All RE:GEN businesses are subject to the same requirements and standards when recruiting new employees irrespective of the role or location. RE:GEN’s HR department oversees all recruitment of permanent and temporary staff and reports directly to the Executive Board reporting monthly on recruitment activity. Direct access to the Executive Board allows for any concerns or issues to be highlighted and addressed at the earliest opportunity with oversight at the highest level.

RE:GEN adopts the same approach to the identification, recruitment and due diligence of its suppliers. Whilst each of the subsidiaries procures and manage its own services and suppliers, it has the continued support and resource of a centralised procurement team. Each subsidiary is audited and held accountable against the same set of standards and procedures mandated by the parent company and procurement policy is implemented

with central oversight. As with RE:GEN's HR department, the RE:GEN Group procurement team is accountable directly to the Executive Board. RE:GEN audits and monitors the compliance of its subsidiaries against legal and regulatory procedure as well as Group policies and compliance is reported to and monitored by the Executive Board.

Business and Supply Chain Overview

Our core purpose is to enhance lives through safe, sustainable housing regeneration. We work closely with and for the local communities in which we operate. We strive to achieve the highest standards to create a lasting positive impact and expect the same of our sub-contractors and supply chain. Beyond delivery construction services, we invest in social value initiatives aimed at tackling poverty, crime and unemployment in the communities we work in.

Our operations utilise inter-company supply arrangements ensuring consistent application of our policies and procedures. All employees and consultants – permanent or temporary – undergo right to work checks and, where appropriate, enhanced screening such as DBS or DVLA license checks. Agency workers are subject to equivalent vetting through our agency partners.

We prioritise sourcing labour and materials locally wherever possible and seek to build long term relationships with trusted suppliers. Through these relationships we gain visibility into our supply chain's recruitment and procurement practices as well as their legal and regulatory compliance. We work collaboratively with our supply chain to identify and combat the potential risk of modern slavery. Wherever possible, we seek to work with them to educate the wider workforce to identify the potential for modern slavery and strengthen preventative measures.

RE:GEN Academy Limited provides training and educational services and works directly with many of our sub-contractors and the wider industry to fill training and recruitment needs. This engagement enhances visibility into recruitment practices and help safeguard individuals' rights throughout the hiring process.

As part of our continued growth and increased use of sustainable energy materials, we have expanded our procurement to include international sources. We recognise global sourcing presents a higher-risk of forced and child labour. As such, this area requires an enhanced level of due diligence, rigorous auditing and management to ensure ethical and responsible procurement practices.

Policies and Governance Framework

RE:GEN takes its obligations under the Modern Slavery Act 2015 extremely seriously and adopts a zero-tolerance approach to any form of human rights abuse. While most of our supply chain is locally sourced and exists of longstanding partners, we have identified

higher-risk areas beyond our local supply base and work with those suppliers as far as possible to ensure transparent dealings, fair and legal trading and employment practices.

We are committed to working with our supply chain to ensure compliance with the Modern Slavery Act 2015 and eradicate human rights abuse. All sub-contractors are required to sign annual declarations that they have and will continue to comply with the Modern Slavery Act 2015. Should we identify or suspect non-compliance we would take immediate action, which may include terminating the relationship, or if more appropriate, working with them to address the issue by establishing fair recruitment and employment practices.

All site-based suppliers or sub-contractors must complete on-site induction before they are permitted to work. This includes additional identification and compliance checks as well as the requirement for each individual to acknowledge and accept our onsite policies and procedures. We have robust reporting channels which our workforce is aware of.

We maintain Group wide policies covering key areas such as modern slavery, code of conduct, responsible procurement, and worker's rights, including freedom of movement and termination of contract. We strictly prohibit violence or threatening or intimidating behaviour, harassment, compulsory labour, any form of child labour. Whilst we complete stringent ID checks, under no circumstances would we allow the confiscation or retention of any original worker documentation.

The Executive Board is responsible for ensuring ongoing compliance with all RE:GEN policies across the wider Group. This is done in various ways including monthly board reporting, clear escalation procedures, regular updates and training, director visits and unannounced spot checks and regular audits.

Actions Taken in FY24/25

During FY24/25 RE:GEN implemented a new procurement system designed to establish minimum due diligence standards for all our suppliers. This system includes both the initial assessment of new suppliers as well as periodic reviews of existing ones. This has been implemented across the Group with the exception of RE:GEN Solutions Limited (**Solutions**). As Solutions typically delivers end services directly and operates with a limited supply chain, it has continued to follow RE:GEN's recruitment and HR standards, with procurement support provided centrally when needed. Full integration into the new procurement system is expected to be completed by October 2025.

We have also updated our whistleblowing policy, clarifying reporting mechanisms, escalation processes, and available external support resources. In addition, our standard subcontract terms have been reviewed and amended to strengthen our auditing powers and include explicit rights of termination in the event of non-compliance with the Modern

Slavery Act 2015. All suppliers are required to sign these standardised terms as a condition of engagement.

Our commitment

As RE:GEN continues to grow and expand into new operational locations and services, we recognise that the risk of modern slavery within our supply chain may increase. To address this, we are undertaking a comprehensive review of our recruitment and procurement procedures to ensure they remain robust and effective.

We will also conduct an updated and detailed risk assessment of our supply chain to identify potential areas of concern. This process includes mapping our supply chain in detail and appointing internal champions to uphold our modern slavery standard across all stakeholder interactions. We aim to complete this assessment by the end of our present financial year (FY25/26).

Following the review and risk assessment, we will update and roll out revised policies and procedures, and training. Training will include workshops for employees and subcontractors focused on recognising indicators of modern slavery and forced labour. We will incorporate lessons learned from employees' previous experiences and collaborate with our supply chain and customers to adopt and embed best practices. We aim to complete this process by the end of Q2 in FY26/27.

We will assess the effectiveness of our actions in preventing modern slavery through regular audits, supplier reviews, analysis of incident reports, and monitoring completion rates of training and awareness programmes. These performance indicators will guide our continuous improvement efforts and ensure that our policies and actions deliver measurable, positive impact across our operations and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes RE:GEN Group Limited's slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the RE:GEN Group Ltd Board on 30th September 2025.



Lee Francis, CEO

RE:GEN Group Ltd

Date:14th October 2025