

RE:GEN Group

Modern Slavery Statement FY25/26

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 2026 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 is a construction and regeneration business operating in the Midlands and the North of England. We specialise in the refurbishment and regeneration of social housing and work predominantly with registered social housing providers and local authorities. 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. Beyond delivering construction services, we invest in social value initiatives aimed at tackling poverty, crime and unemployment.

The Group comprises seven wholly owned subsidiary companies, all under the immediate and ultimate control of RE:GEN Group Ltd. 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 Executive Board also delegates authority to various operational and strategic committees, including our Governance and Risk Committee, Health and Safety Committee, our People Group and our modern slavery steering committee. Their purpose is to continuously review our operational compliance and report directly to the Executive Board with recommendations for procedural or policy updates or developments to ensure the entire Group meets its legal and ethical obligations.

The Group has seen continued growth throughout FY25/26 with a consolidated turnover of £130m. Following our expansion into Yorkshire and East Midlands in FY 24/25, we further expanded our footprint in the Midlands with the establishment of RE:GEN Midlands Limited. This has driven recruitment in both administrative and operational roles. As at end of FY25/26 the RE:GEN Group employed 430 people.

We recognise that construction consistently ranks among the highest-risk sectors for labour exploitation. Data from the charity, Unseen, shows that construction is one of the

most reported industries for cases of exploitation in the UK. This is due to a variety of structural factors including (a) complex, multi-tiered supply chains (b) acute skilled labour shortages (c) heavy reliance on temporary and agency labour (d) cash-based and information payment practices and (e) transient nature of project-based site structures. These factors mean that even well-intentioned contractors with formal policies and processes can have limited real visibility into conditions in the lower tiers of its supply chain.

Governance, policies and practices

Our Group Chief Executive and the RE:GEN Board have ultimate responsibility for our response to modern slavery. We have also established a modern slavery steering committee with cross functional representation including legal, procurement, operations and training. The steering committee provides strategic focus and oversight and has worked hard in 2025 to strengthen our framework and risk assessment methodology to better address and mitigate the risk of modern slavery in our own operations and those of our supply chain.

We have a suite of policies that form the modern slavery policy framework. These include:

- Modern Slavery Policy
- Recruitment Policy
- Procurement and onboarding processes
- Whistle-blowing Policy

Policies and standards are built into our contract documentation and form part of our onboarding process. Our subcontractors and suppliers are also required to sign an annual declaration that they have and will continue to have policies and processes in place to comply with the Modern Slavery Act 2015. We have extensive powers of audit, and should we identify or suspect non-compliance we would take immediate action. This could involve working with them to address the issue or in the worst case, could result in termination of the relationship.

Due Diligence Processes

Internal workforce

We take a robust and consistent approach to recruitment and management of our employees and temporary workers. We have an 'Employee Screening Policy' which requires right to work checks and other monitoring to be undertaken to reduce the risk of exploitation and ensure fair and lawful employment. RE:GEN's HR department oversees recruitment of permanent and temporary staff and reports directly to the Executive Board reporting monthly on recruitment activity. Our recruitment processes are kept under regular review and aligned with industry good practice and national standards.

Temporary labour

The use of temporary labour has been identified as posing the greatest risk of forced labour in our direct operations. Within the last year we have developed a preferred supplier list for temporary labour providers, and the majority of our temporary labour is sourced from those agencies. Our preferred providers are well-reputed and our contractual relationships with them require them to undertake robust onboarding checks before a worker is engaged, perform regular audits on workers and produce an annual slavery and human trafficking report.

Supply Chain

Wherever possible, we source labour and materials locally and build long-term relationships with trusted suppliers. These relationships provide greater visibility into our suppliers' recruitment and procurement practices, including their compliance with legal and regulatory requirements. As the Group grows, we expect to engage new supply-chain partners. We therefore take a proactive, risk-based approach to managing modern slavery risks, beginning with robust supplier due diligence and onboarding.

As part of this approach, we have carried out a risk assessment of our supply chain and have identified the supply-chain categories and locations that we consider to present a higher risk of modern slavery. Where a supplier or subcontract package is identified as one of these higher risk categories, we have developed of a tailored supplier due diligence and engagement question set and an enhanced due diligence process. This is to ensure that category specific risks are appropriately reflected in our controls and assurance activity (and that the rest of our supply chain is not overloaded). The process has been deployed for the procurement of solar panels in 2025 and will be rolled out to other categories in 2026.

At an operational level, 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 worker on site to acknowledge and accept our onsite policies and procedures. Our sites are subject to a regular regime of inspections from our Health & Safety team, director visits and unannounced spot checks during which worker welfare issues are addressed.

Communication

In 2025 we reviewed and updated our Whistleblowing Policy to strengthen the clarity and accessibility of our reporting mechanisms. The updated policy sets out clear escalation processes, and signposts external support resources for individuals who wish to raise concerns outside internal channels. This policy is communicated to, and available to, employees and workers across our operations, ensuring that anyone with a genuine concern – including in relation to modern slavery and human trafficking – has a clear and confidential route to raise it.

Training

Modern slavery is an operational issue and not just a legal and compliance issue. Our employees, workers and supply chain partners play a key role in helping us to identify and prevent modern slavery in our operations. Training is vital to support these individuals to recognise and respond to the risks of modern slavery.

RE:GEN Academy Limited provides training and educational services and is developing a tailored modern slavery training offering relevant to our own operations. RE:GEN Academy is collaborating with a charity supporting victims of modern slavery so lived experience informs the content. It will comprise workshops, e-learning modules as well as in person tool-box talks. The intention is to roll this out across our own operational and support teams before expanding it beyond our own operations to our supply chain in 2026/27.

To support our training efforts, in 2026 we will run a poster campaign to offer a visual reminder of the signs of modern slavery and the importance of reporting any concerns. These posters will be displayed across our site offices and translated into multiple languages

Our commitment and future plans

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. We will continue to strengthen our governance framework for modern slavery and further embed our enhanced on-boarding due diligence practices for higher-risk categories of suppliers.

Bespoke awareness training developed by RE:GEN Academy will be rolled out across our operational and support teams in 2026/27. This will be supported with the poster campaign at our sites and offices to highlight the signs of modern slavery and reinforce the importance of reporting any concerns in a timely manner to protect vulnerable individuals.

KPIs, measuring activity such as participation in training sessions and supply chain risk assessments will be implemented to assess the effectiveness of our actions. These will be measured through 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 chain.

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 2026. It was approved by the RE:GEN Group Ltd Board on 22 September 2026.

Lee Francis, CEO

RE:GEN Group Ltd

Date: 29 September 2026