

GenusPlus Group Ltd (**Genus** or **Company**) recognises that Modern Slavery is a significant problem across the world and is committed to ensuring that it does not occur in the Company's operations. Genus regards the protection of human rights as fundamental and strives to uphold these values by fostering a workplace and supply chain that neither involves nor facilitates Modern Slavery practices.

## 1. What is Modern Slavery

Modern Slavery is a crime and a violation of human rights, and is defined under the *Australian Modern Slavery Act 2018 (Act)* as including:

- Forced labour;
- Debt bondage; and
- Deceptive recruiting for labour or services.

## 2. Purpose of this Policy

This Policy is aimed at ensuring compliance by Genus and its employees, counterparties, and stakeholders with the requirements of the Act. It demonstrates Genus' commitment to a zero-tolerance approach in relation to Modern Slavery and sets out its commitment to the prevention and detection of any potential Modern Slavery exposure in Genus' business or supply chain.

## 3. Board and Senior Management

The Board and Senior Management of Genus is committed to ensuring Genus addresses Modern Slavery risks in its business and supply chains in a way that is appropriate for its operations and group functions, by:

- ensuring this Policy is communicated to employees, stakeholders, and other interested parties;
- providing relevant training on Modern Slavery to Genus employees and suppliers;
- performing appropriate checks on suppliers and counterparties to assess compliance;
- including, as far as practicable, in its operational and supplier contract terms, requirements that suppliers comply with all relevant local, national, and other applicable laws and regulations in the areas in which they operate;
- ensuring this Policy and its requirements are appropriately considered within the context of Genus' activities;
- allocating resources as required to enable the requirements of this Policy to be met; and
- assigning authority, responsibility, and accountability at appropriate levels within the Company as a measure to protect against such risks.

#### 4. Governance and Accountability

- Managers are responsible for ensuring those reporting to them understand and comply with this Policy.
- Procurement and commercial teams are responsible for assessing supplier risks and ensuring due diligence is conducted prior to engagement.
- The onboarding and training teams are responsible for incorporating Modern Slavery awareness training into onboarding and training programs.
- Commercial Managers of each business unit are responsible for monitoring compliance with the Act within their business unit, undertaking due diligence as required on suppliers, and reporting any breaches or concerns in relation to any potential breaches of the Act to the Group General Counsel.

#### 5. Commitment and Actions

The Company has a zero-tolerance approach to Modern Slavery, and to meet its commitments it will:

- require its employees, suppliers, contractors, and business partners to comply with the Act and all applicable Modern Slavery laws in countries in which it operates;
- communicate to its employees, contractors, suppliers, and business partners the requirement for compliance with the Act; and
- provide training as required in relation to Modern Slavery and the requirements of the Act.

In addition, Genus will:

- regularly monitor its progress in relation to identifying, assessing and mitigating Modern Slavery in its operations and supply chains;
- report to the Commonwealth as required in accordance with the Act on the steps it is taking to identify, assess and mitigate Modern Slavery risks in its operations and supply chains; and
- address Modern Slavery in its relevant policies, procedures, and processes, such as the below:
  - Code of Conduct;
  - Anti-bribery and Anti-corruption Policy;
  - Whistleblowing Policy;
  - Procurement and Logistics Procedure;
  - Contract Review Checklist;
  - Supplier and Subcontractor Prequalification Form;
  - Pre-Contacts Manual;
  - Pre-Contract Management – Commercial Procedure; and
  - Supplier Confirmation Questionnaire.

This Policy applies to all of Genus' employees, business partners, contractors, and suppliers, who each have a responsibility to implement and adhere to this Policy.

#### **Continuous Improvement**

Genus is committed to ongoing improvement in identifying, assessing, and addressing Modern Slavery risks within its operations and supply chain. This Policy will be reviewed and updated as needed to ensure it remains current and reflects evolving legal requirements and stakeholder expectations.



David Riches

Managing Director  
GenusPlus Group Ltd  
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