

Modern Slavery Act & Human Rights Policy

Genco UK Group Ltd recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Genco specialise in both reactive, planned and preventative maintenance within the retail sector with all works being carried out by our skilled operative team supported by specialist UK based contractors who have been subject to Genco stringent induction process prior to being added to our supply chain.

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy considers, and supports the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001, ISO 14001 and ISO 45001. The implementation and operation of this management system underlines our commitment to this policy statement. We will ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement. This policy applies to all those employed by Genco.

What are Human Rights?

Human rights are described as being "inherent, inalienable and universal".

- Inherent – because they are acquired by individuals simply by reason of their birth.
- Inalienable – because the rights cannot be taken away.
- Universal – because they apply to all persons regardless of nationality, status, sex or race.

Some rights provided for by the Act are "absolute" whilst others are "qualified"

- Absolute – the right to exist without any limitations or exceptions unless those exceptions are expressly provided for in the convention itself.
- Qualified – the right is one that exists in certain "qualified circumstances" which in simple terms means that the limitations and restrictions imposed are justified as being "necessary" in a democratic society. The act specifies a number of circumstances when such restrictions would be justified: "in the interest of national security, territorial integrity, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, to protect health and morals or the protection of rights and freedom of others."

There are 16 basic human rights under the law:

1. The Right to life
2. The Right to freedom from torture and inhumane or degrading treatment or punishment
3. The Right to liberty and security
4. The Right to a fair trial
5. The Right to have one's family life and private life respected
6. The Right to freedom of thought, conscience, and religion
7. The Right to freedom of expression
8. The Right of assembly and association

9. The Right to education
10. The Right not to be subjected to the death penalty
11. The Right not to be discriminated against
12. The Right to marry
13. The Right to protection of property
14. The Right to free elections

The definition of human rights is that everybody is entitled to be treated as we would like to be treated ensuring that individuals and groups are protected from the abuse of power.

General Principles

Genco are committed to providing a service which adopts the highest standard of ethics and values by maintaining an open-door policy ensuring continual communication with our employees, customers, and other interested parties.

At Genco we respect all fundamental human rights, this is evidenced by the way we, as a company and our employees, conduct our business. This is supported by our compliance with The Modern Slavery Act 2015.

Training

All staff are issued with a copy of this policy. Managers are given internal training on HR Training including Modern Slavery and Human Rights annually.

Summary

Genco will maintain our standards by:

- Regular Monitoring of our activities
- Encouraging the reporting of concerns and the protection of whistle blowers
- Genco will not knowingly support or deal with any business involved in slavery or human trafficking.
- Zero tolerance to slavery or human trafficking and expect the same from all our supply chain.

A copy of this policy is available to third parties on upon request.

This policy will be review annually or as and when required.

This policy applies to Genco UK Group Ltd and all it's subsidiaries.

SIGNED: John Roberts
Operations Director



DATE: September 2025