

Introduction from the RE:GEN Group CEO

RE:GEN Group Ltd (**RE:GEN**) is a construction business based in the North of England specialising in the refurbishment and regeneration of social housing. Our business is primarily conducted through public tendering and directly awarded contracts from local authorities or Registered Providers.

RE:GEN has undergone a restructure and has six fully owned trading subsidiaries: RE:GEN North East Limited, RE:GEN North West Limited, RE:GEN Solutions Limited, RE:GEN Green Limited and RE:GEN Academy Limited.

The restructure of the Group has enabled a central point of control in relation to the implantation and audit of policies and procedures across the whole RE:GEN Group. This helps to ensure consistency of quality and application across the subsidiaries and supply chain. Whilst each of the subsidiaries procures and manage its own services and suppliers, each is audited and held accountable against the same set of standards and procedures mandates by its parent company. RE:GEN audits and monitors the compliance of its subsidiaries against legal and regulatory procedure as well as Group policies.

Our business and supply chains

Our business purpose is to enhance lives through safe, sustainable housing regeneration. This involves working closely with and for the local communities in which we operate. We strive to achieve the highest standards to create a lasting positive impact for residents and expect the same of our sub-contractors. This goes beyond the supply of construction services and involves investing in meaningful social value combating poverty, crime and unemployment in disadvantaged areas.

As part of our operations, we utilise inter-company supply between our subsidiaries ensuring our policies and procedures are adhered to, whether that be in procuring materials and labour or delivering works on site. We undertake right to work checks on every employee and consultant whether engaged on a permanent or temporary basis. We utilise agency workers on occasion and work with the relevant agency to confirm the relevant checks are done. We also complete enhanced checks, such as DVLA and DBS checked, where the role or circumstances warrant it.

In addition to inter-company contracts we utilise local labour and supply wherever possible. Our supply chains include labour only as well specialised products and services ranging from skilled labour to specialist designers and consultants. We seek to develop partnerships with trusted suppliers to allow us to understand their operations, recruitment and procurement processes. This allows greater visibility into our supply chain and their legal and regulatory compliance with the aim of working collectively to identify and combat the potential risk of modern slavery.

RE:GEN Academy Limited (**Academy**) 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 direct involvement provides RE:GEN with greater visibility into our supply chain's recruitment practices. This in turn allows RE:GEN to ensure appropriate procedures are followed in protecting individual's rights during the hiring process.

We take our obligations under the Modern Slavery Act 2015 extremely seriously and condemn any abuse of human rights. Most of our supply chain is locally sourced and with whom we have longstanding relationships. We are committed to working with our supply chain to ensure compliance with the Modern Slavery Act 2015 and eradicate human rights abuse. All of our sub-contractors are required to sign annual declarations that they have and will continue to comply with the Modern Slavery Act 2015.

In addition to right to work checks, all site-based suppliers or sub-contractors must undertake an on-site induction before being permitted to work. This includes additional ID and process checks as well as the requirement for each individual to sign up to and comply with our onsite policies and procedures. We have robust reporting procedures and practices which our workforce is aware of.

Our commitment

Following the restructure of the RE:GEN Group, internal reviews are underway into our policies and procedures, including our approach to procurement, supplier due diligence checks and training. The intention is to implement a standard centralised policy and governance to be adhered to across the entire Group. This will ensure that all our subsidiaries operate consistently in how we combat modern slavery. This will include an updated policy as well as a training programme to be rolled out at all levels across our entire business. It is our aim to complete this exercise by the end of the present financial year.

We are also developing a new procurement policy and system which will assist us in vetting and undertaking enhanced due diligence on our supply chain. It will also allow us to efficiently implement intermittent checks after a new supplier is onboarded to ensure compliance is maintained. This will allow RE:GEN to develop a list of pre-approved and trusted suppliers with whom we can work to combat modern slavery in our industry. The implementation of our procurement and management system across our subsidiaries will commence in October 2024.

We will also launch an updated whistleblowing policy which is expected to be published by December 2024. This will be rolled out across the RE:GEN business initially and thereafter our supply chain. This will identify clear methods as to how concerns and reported and the escalation process within the new group structure.

Our standard contracts and terms will be reviewed to ensure the requirement of our sub-contractors and suppliers in respect of modern slavery and human rights is clear and robust. Every supplier engaged to deliver goods or services, either in respect of a particular project or ad

hoc supply, will be required to sign up to a standardised set of terms. RE:GEN will then be equipped to take legal action in the event any non-compliance is identified.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Group's slavery and human trafficking statement for the financial year ending 31 March 2024. It was approved by the RE:GEN Group Ltd board on 9 October 2024.

Lee Francis

[Lee Francis \(Oct 9, 2024 09:52 GMT+1\)](#)

Lee Francis, CEO

RE:GEN Group Ltd

Date: **10/09/2024**

Modern Slavery Act 2015_ 23-24 statement (approved 09.10.24)

Final Audit Report

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