

Godfrey Investment Group Limited

Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 October 2025 which will be applied moving forward to the current financial year.

Godfrey Investment Group ('the Company', 'we', 'us' or 'our') and its subsidiaries are committed to preventing slavery and human trafficking violations in our operations, its supply chain, and its products. We have zero tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

PGIS Development Limited is a subsidiary of Godfrey Investment Group Limited and has business operations in the United Kingdom.

We operate in the Property Development, Investment and Rental sector. The nature of our supply chains is as follows: We work with a number of key construction suppliers, who supply us with building equipment and trade services for our developments. We also work with office suppliers who provide us with goods, such as equipment for our premises, and services such as outsourced business processes, IT support and brand / marketing services.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- **Recruitment and selection policy** - We conduct checks on all prospective employees to verify that they are eligible to work in the UK. We also cross check prospective employees against the U.K. sanctions list.
- **Supplier code of conduct** - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.
- **Whistleblowing policy** - We have a nominated office representative so that employees are able to raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.
- **Staff code of conduct** - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.
- **Procurement policy** - We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Asking our suppliers to provide a copy of their Modern Slavery statement and conduct audits on those that fall into high-risk categories.
- Training our staff to spot the signs of modern slavery inside our company and throughout our supply chain.
- We Perform human rights due diligence on our business and our supply chain to better understand potential areas of exposure or key risks in our operations.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains

- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK (this is low risk) but from an industry perspective where our contractors are sourced for the construction industry this is a higher risk.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We have trained all staff about modern slavery issues and increased awareness within the Company.
- We will carry out a regular audit of suppliers - 75% of suppliers each year.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking - we use the "Spot the Signs" training as issued by [the UK Government](#)
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.

Next steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- We will annually review our Code Of Conduct and our Supplier Code of conduct. We will be conducting an annual supplier audit for our key suppliers.

The statement was approved by the board of directors.

Signed



Amanda Godfrey, Director, PGIS Development Limited and Director, Godfrey Investment Group Limited.

Date 30/10/25