

## Modern Slavery Statement

For the financial year ending 31<sup>st</sup> March 2025

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### 1. Introduction

GPF Lewis PLC (“the Company”) is committed to conducting business responsibly, ethically, and with integrity. We oppose all forms of modern slavery, human trafficking, forced labour, and child labour.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act and sets out the steps taken by the Company during the financial year ending 31<sup>st</sup> March 2025 to identify and address the risks of modern slavery in our operations and supply chains.

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### 2. Our Structure, Business, and Supply Chains

- **Who we are:** An established construction and refurbishment specialist with over 18 years of experience, delivering high-quality projects. Providing full internal and external refurbishments, complete new builds and specialist construction services including façade remediation, across multiple sectors, covering residential, commercial, hospitality, healthcare, education, and leisure.
  - **Where we operate:** London, South-East, South Midlands and East Anglia.
  - **Our supply chains:** The company sources from a mix of large national and specialist local suppliers, covering raw materials (steel, timber, concrete, finishes), custom manufacturing and fabrication, logistics and plant hire, as well as professional services such as architects, engineers, and M&E specialists. This diverse supply base supports projects of all scales across multiple sectors.
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### 3. Risks of Modern Slavery

We recognize that modern slavery risks may arise in:

- Materials and product supply chains.
  - Use of agency workers and subcontracted staff.
  - Site services such as cleaning and security.
  - Subcontracting practices by our subcontractors
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#### 4. Policies and Governance

We have implemented the following policies to help prevent modern slavery:

- **Anti-Slavery and Human Trafficking Policy** – setting expectations for ethical behaviour, ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- **Whistleblowing Policy** – We operate a whistleblowing policy to ensure that all employees feel safe and supported in raising concerns. This policy allows staff to report issues relating to the treatment of colleagues, or any practices within our business or supply chain, without fear of reprisal or negative consequences.

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#### 5. Due Diligence Processes

To identify and mitigate risks, we:

- Operate a robust recruitment process and conduct eligibility to work in the UK checks for all new employees.
- Include modern slavery assessment into our supplier PQQs.

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#### 6. Actions Taken

During this reporting period, we:

- Delivered modern slavery awareness training to all inducted construction site personnel including subcontractor employees.

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#### 7. Measuring Effectiveness

We track progress using the following key performance indicators (KPIs):

- Number of people trained.
  - Number of reports or concerns raised and investigated.
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## 8. Future Commitments

We are committed to:

- Enhance contract management by introducing modern slavery clauses.
  - Improve supplier monitoring by digitising our supplier onboarding process.
  - Improve training monitoring by expanding our digitised onboarding system to cover more locations.
  - Introduce risk-based assessments of high-risk suppliers
  - Introduce supplier/subcontractor audits and spot-checks.
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## 9. Approval and Sign-Off

This statement was approved by the Board of Directors of GPF Lewis on 29<sup>th</sup> September 2025.

**Signed:**

A handwritten signature in black ink that reads "Ian Loader".

Ian Loader  
Health, Safety and Compliance Director  
GPF Lewis PLC

**Date:** 29<sup>th</sup> September 2025