

Modern Slavery Statement

Barhale Holdings plc is the parent company of Barhale Ltd, Barhale Construction Services Ltd (BCS Group) and Barhale Properties Ltd. Barhale Ltd is a large civil engineering contractor directly employing approximately 1300 staff in regional offices and projects across the United Kingdom and Canada. BCS Group is a supplier of safety and construction products and services in addition to sign production, steel fabrication and plant. Barhale Properties Ltd holds and manages Barhale's property portfolio.

The main sections that Barhale work in are water, energy, transport and built environment. Within these sectors, our business activities include civil engineering, tunnelling, MEICA, steel fabrication, plant, training, and the provision of signs and supplies.

The Barhale preferred delivery structure is to self-deliver, with an aim to utilise our supply chain for specialist skills and peaks in workload.

Our immediate Tier One supply chain is focussed on the activities of:

- a) Procurement of construction materials
- b) Hiring and provision of plant and machinery
- c) Sourcing subcontracted labour services to support and augment our existing resources.

98% of our materials are purchased directly with UK based suppliers, distributors or agents. These suppliers, distributors or agents may use international Tier Two manufacturers.

The primary focus of implementing a Modern Slavery and Human Trafficking Statement across Barhale is to ensure that anti-slavery activity is recognised and embedded within our business as standard practice. We endeavour to ensure that all staff members, regardless of position, take joint responsibility for the identification and reporting of issues, to ensure basic standards are clearly communicated and met.

The following is a list of steps we have taken to ensure no Modern Slavery or Human Trafficking exists within our own business or any of our supply chains;

1. Distribution of the Modern Slavery Statement and supporting information to existing workforce, suppliers, subcontractors and labour providers. Publication of the Barhale Modern Slavery Statement on all Barhale company websites and within all relevant published media.
2. Changes to the structure of our supply chain pre-qualification questionnaire and processes, requesting that all potential suppliers adhere to the ethics detailed in the Modern Slavery statement and behaviours detailed therein. Signed Acceptance is required.

Additionally we work in conjunction with Constructionline supplier prequalification systems which address the issues of Modern Slavery and Human Trafficking within their integral audit acceptance processes.

3. Barhale operates and trades in accordance with the Base Code Principles as laid out in the Ethical Trade Initiative.
4. Ongoing programme of procurement team training on Ethical Procurement and Supply, in conjunction with the Supply Chain Sustainability School and the Chartered Institute of Procurement and Supply, to instil practises of issue identification, reporting methods,

issue management and improvement. This staged process will ensure due diligence and transparency of action at all stages.

5. Promotion of contact details and awareness of Modern Slavery issues, across our business and supply chains, for individuals to obtain guidance and support, including but not limited to Barhale Whistleblowing Helpline, UK Government Modern Slavery Helpline, Slavery and Human Trafficking helplines, and website resources for definitions, identification and practical assistance.
6. Development of KPI, reporting and auditing measures to ensure continual progress, developed in conjunction with Barhale supply chain.
7. Delivery of Modern Slavery e-learning training as part of our on-boarding process to all new members of staff, featuring guidance on identification and methods of reporting suspected instances, with yearly refresher training thereafter.
8. Build knowledge and capability of our Modern Slavery approach internally and across our supply chain via the Supply Chain Sustainability School (SCSS).
9. Formed a Modern Slavery working Group who ensure we have a consistent approach to identifying risks, raising awareness throughout the business and communicating action to take and who to contact when people have concerns.
10. Development of a Risk Management Framework where Modern Slavery is reviewed by the Board to ensure we record and identify potential risk associated with our business and supply chain and continuously improve our risk and control measures.

These measures are subject to ongoing review and additional measures will be developed and implemented as required, and reviewed as a minimum on an annual basis, within six months of the financial year end, which for Barhale is the end of June.

A handwritten signature in black ink, appearing to read "MB", with a stylized, flowing underline.

Martin Brown
CEO
December 2025