

O'HARA BROS SURFACING HOLDINGS LIMITED and O'HARA BROS SURFACING LIMITED MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial Year Ending: 30 September 2024

Organisation Structure, Business and Supply Chains

O'Hara Bros Surfacing Limited is a UK-based civil engineering and surfacing contractor.

O'Hara Bros Surfacing Holdings Limited is the parent company of O'Hara Bros Surfacing Limited.

O'Hara Bros Surfacing Limited operates a UK-based civil engineering and surfacing business, delivering infrastructure and surfacing projects for public and private sector clients across the UK.

This statement applies to both O'Hara Bros Surfacing Holdings Limited and O'Hara Bros Surfacing Limited and covers all operations and supply chains of both organisations. Our supply chain includes subcontractors, materials supplies, consultants, and service providers

Policies in Relation to Slavery and Human Trafficking

O'Hara Bros Holding Limited and O'Hara Bros Surfacing Ltd have a zero-tolerance approach to modern slavery. Our Modern Slavery Policy outlines our commitment to ethical conduct and compliance with the Modern Slavery Act 2015. This policy is embedded in our operations and communicated to all employees and business partners. We expect our supply chain to adopt the same high standards.

Due Diligence Processes

We conduct due diligence on our supply chain to assess and mitigate risks of modern slavery. This includes:

- Requiring suppliers to confirm adherence to our Modern Slavery Policy.
- Including anti-slavery clauses in contracts.
- Reserving the right to audit suppliers where concerns arise.
- Conducting site visits and supplier evaluations for high-risk categories.

Risk Assessment and Management

We recognise that the construction industry is at heightened risk of labour exploitation. We assess risk based on:

- Sector and geographic location of suppliers.
- Nature of services provided.
- Labour practices and recruitment methods.

We prioritise engagement with high-risk suppliers and take corrective action where necessary.

Effectiveness and Performance Indicators

To measure our effectiveness in combating modern slavery, we monitor:

- Completion rates of staff training.
- Supplier compliance and audit outcomes.
- Reports or incidents raised and resolved.
- Annual internal reviews and risk assessments.

Training and Capacity Building

All employees receive training on modern slavery risks and reporting procedures. Toolbox talks and e-learning modules are used to ensure accessibility. We also provide guidance to our supply chain partners to raise awareness and promote compliance.

Reporting and Whistleblowing

We encourage openness and transparency. Employees and suppliers can report concerns confidentially to their line manager or an alternative manager.

In 2025, we formalised and published our Whistleblowing Policy, which outlines clear procedures for raising concerns, including the option to report anonymously. The policy includes a structured process for investigation, appeal, and protection against retaliation. A whistleblowing form is also available to support structured reporting.

The policy is accessible to all employees, contractors, and supply chain partners, and is promoted across our sites in multiple formats.

Continuous Improvement

We are committed to continuous improvement. Our goals for the coming year include:

- Enhancing supplier audits and risk-based assessments.
- Expanding training coverage and multilingual awareness materials.
- Establishing KPIs and a working group to monitor progress.

This statement has been approved by the Board of Directors of O'Hara Bros Surfacing Holdings Limited and O'Hara Bros Surfacing Limited and signed on its behalf by:

Chris O'Hara

A handwritten signature in black ink, appearing to read 'Chris O'Hara', written in a cursive style.

Director

O'HARA BROS SURFACING HOLDINGS LIMITED

O'HARA BROS SURFACING LIMITED

Date: 01/05/2026