



Modern Slavery Statement & Human Trafficking Statement

We at Felix O'Hare & Company Ltd are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

ORGANISATION STRUCTURE, BUSINESS & SUPPLY CHAINS

Felix O'Hare is one of the Northern Ireland's leading construction companies, operating exclusively within the United Kingdom and the Republic of Ireland. We are not part of a Group of companies or a subsidiary of any parent company or group.

Our business is structured to deliver Building - Delivering new build, refurbishment, and fit-out projects across key sectors such as Education, Healthcare, Leisure, Industrial, Conservation and Commercial Property.

Our projects are typically secured via public sector procurement & through long-term frameworks with public sector clients such as, the Government Commercial Agency (GCA) and Pagabo.

We employ circa 92 employees and operate through our Newry Head office and a regional office in Ireland, enabling us to combine national capability with local delivery.

The vast majority of projects are delivered in partnership with our supply chain, which is extensive and diverse, reflecting the complexity of the construction industry. It includes subcontractors, material suppliers, plant providers, and directly employed Labour resources. Approximate breakdown of the relative procurement spend by supply chain category is shown below:

- Subcontractors 63%
- Materials 7%
- Directly Employed Labour 8%
- Plant and equipment hire 15%
- Other 7%

We adopt a procurement model based on local subcontractors and suppliers supporting regional economies and ensuring responsiveness to project needs.

We are also committed to 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. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Issue Date:

August 2026

Next Review Date:

August 2027

Mark Campbell

Managing Director



FELIX O'HARE
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OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we adhere to the ISO standard 9001. Our purchasing department control all preferred suppliers and ensure preferred suppliers are regularly reviewed to ensure compliance with procedures. All suppliers are required to adhere to our corporate ethics policies and comply with current legislation in the local market.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

ASSESSING & MANAGING RISK

We have assessed the risk of modern slavery and forced labour in our own operations and supply chain and identified two broad categories of workers who could be at risk:

EMPLOYEES

The people who we employ directly could be at risk of modern slavery, but we consider the risk to be very low given the risk mitigation measures we have in place.

These include:

- We verify that all direct employees have the right to work in the UK & Ireland prior to any formal offer of employment being made.
- We make all employees aware of their working hours, leave and absence entitlements and other
- employment benefits via their contract of employment.
- We prohibit the use of forced labour in our Code of Conduct (Doing the right thing) and make training on modern slavery available to all employees.
- Requiring all site-based operatives to provide evidence of their CSCS cards.
- We do not permit the use of agency workers outside of those who are provided by suppliers on our Preferred Supplier List to mitigate the slightly higher risk because we are reliant on third parties to have procedures in place to prevent modern slavery and forced labour.

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MATERIALS & SUPPLY CHAIN

We have assessed the greatest risk of modern slavery and forced labour to exist within the extended supply chain relating to the building materials and other manufactured products that we use on our projects due to the majority of materials are procured indirectly through subcontract packages of work. We seek to mitigate this risk by operating a rigorous subcontractor and supplier procurement processes include proportionate measures to address the risk of modern slavery and forced labour in our supply chain. These include measures at the supplier selection, stage and when we enter into contract, in addition we seek to procure the majority of our materials from UK/Ireland based organisations that are required to comply with UK law on forced labour and we are working to improve identification of slavery and human trafficking risks as part of our subcontractor/supplier selection process.

MONITORING & EVALUATION

Modern Slavery Assessment Tool (MSAT) we are in the process of registering to use the UK Government's Modern Slavery Assessment Tool (MSAT) as a core element of our monitoring and evaluation process. The MSAT is a Home Office-developed assessment framework that enables public sector suppliers to demonstrate the effectiveness of their policies, governance, recruitment practices, supply-chain controls, worker protections, and training measures in preventing modern slavery. While not legally mandated, MSAT is strongly encouraged across the UK public sector, and is increasingly required by our clients in central government departments, local authorities, and the Government Commercial Agency (GCA) Formerly Crown Commercial Service frameworks.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have included slavery and human trafficking as part of our purchasing team remit to ensure that all of our business partners comply with the high standards which we set for ourselves and ensure that their own organisations and supply teams are free from slavery and human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff and supply chain through our induction process for all new starts and compulsory training to all existing employees within the business. It explains what modern slavery is and informs our people that it is their responsibility to help prevent, detect and report incidences of modern slavery. We provide specific training to our procurement team on the relevant legislative requirements. We hold toolbox briefings to our project teams with a specific briefing on modern slavery advising our people on the warning signs to look out for and how to report any concerns.

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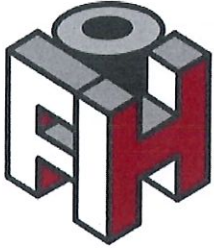
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OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- External independent audit of ISO standards
- Information provided from preferred suppliers

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the further steps to combat slavery and human trafficking by increasing awareness with our suppliers and providing further training to our staff.

We intend to implement the Modern Slavery Assessment Tool (MSAT) to monitor and evaluate our performance in tackling Modern Slavery in our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

This statement was reviewed and approved by the Board of Directors on 30th March 2026. Accountability for compliance with this statement rests with the Managing Director.

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Mark Campbell

Managing Director



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