

## **ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT**

### **INTRODUCTION**

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff and Employees are expected to report concerns and management are expected to act upon them.

### **ORGANISATION'S STRUCTURE**

O'Hagan Civils Limited is a civil engineering and construction company which supplies its services and plant using skilled and certificated operatives, supervisors, engineers and plant operators to deliver its services and products within the Railway, Civil Engineering and Construction Industries. O'Hagan Civils Limited has its head office in the UK and all our business and trading outlets are in the UK.

### **OUR BUSINESS**

Our business is mainly the supply and provision of unoperated and self-operated plant and civil engineering and construction works for civil engineering, construction and railway companies, using our own employees and members of staff.

### **OUR SUPPLY CHAINS**

Our supply chain includes the suppliers of civil engineering and construction materials, plant and vehicle maintenance, plant and vehicle parts, etc.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

\*We are of the view that the part of our business where there is a risk of slavery and human trafficking is our supply chain, and we therefore monitor their activities in relation to our business very closely. We require our supply chain to develop, produce and submit an Anti-slavery and anti-human trafficking policy, condemning the activity and ensuring that due diligence on checking their labour-supply source is regularly carried out.

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. We have set out an appropriate performance indicator, monitoring the percentage of foreign employees in each part of our supply chain, and, incorporate that into our key performance indicators.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk -

- In all cases, we carry out our services and deliver our works to ensure optimum control of the work environment;
- We limit the geographical scope of the delivery of our services to ensure optimum supervision of our work sites, practices and ethics;
- Where possible and practicable, we use locally-based / regional suppliers and build long-standing relationships with those suppliers as well as with our clients, and make clear our expectations of business behaviour;
- \*On yearly basis, we carry out on-site audit of our supply-chain, selecting to audit suppliers with a high risk on modern slavery and human trafficking (on the basis of their declared number of foreign workers;

- We do not use any international supply-chain, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in our business chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the business chain, ultimately to the field or utility generator.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Operations Director is responsible for compliance throughout the Company and for our supplier relationships.

### **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 relevant managers, members of staff and employees. All Managers and members of staff have been briefed on the subject. All our staff and employees have received briefings / training on slavery and human trafficking, informing them of signs to look for in establishing potentials for slavery and human trafficking, within and outside of our organisation, our supply chains, as well as outside of our organisation;

### **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:

- Completion of Audits on our Supply Chain by our SHEQ Manager;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's anti-slavery and human trafficking statement for the current financial year



**Francis O'Hagan – Operations Director**

**Date:** 01/11/2024