

## **Modern Slavery Act Statement**

### **Introduction from the Board of Directors of O&H Strategic Land Holdings Limited**

This page sets out our ongoing commitment as a responsible business to ensure that modern slavery and human trafficking is eradicated.

This is our second Modern Slavery Statement for the 2022 financial year and reflects our ongoing commitment to upholding the highest ethical and professional standards.

We are a property business, with principal interests in land development

Our Group is headquartered in 2 Mill Street, London, W1S 2AT. The Group has over 15 employees and operates in the United Kingdom

O&H Strategic Land Holdings Limited is the parent company of the Group.

Our business is organised into 16 distinct subsidiaries, all related to land development and sale thereon. All subsidiaries are operated by the same management and from the same premises.

### **Our supply chains**

Our supply chains includes a wide range of contractors to support our business.

These contractors generally fall within the following areas: Planners, Construction, General Contractors, Auditors, Solicitors and Insurance.

In terms of our visibility of our supply chain, we maintain records of our direct contractors. We are aware of the significant sub-contractors where present.

### **Our policies on slavery and human trafficking**

We have a zero tolerance approach to modern slavery and human trafficking, and as such 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 also have in place a robust whistleblowing policy, designed to encourage and to protect anyone who wishes to raise concerns about wrongdoing within our business.

### **Due diligence processes for slavery and human trafficking**

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account. We have implemented a number of processes to ensure, as reasonably practicable, that our supply chain adhere to our expectations in respect of their workforce.

If we discover that any of our employees have been complicit in human trafficking or modern slavery, we will take the appropriate disciplinary action against them.

We audit our suppliers on a regular basis and have committed to work only with organisations who share our values and who have pledged to assist in the eradication of slavery and human trafficking.

We monitor and review the controls undertaken by our suppliers and now require, from all our suppliers, an annual statement of their commitment and actions taken to eliminate modern slavery.

We are conscious that imported products or services sourced from outside the UK or EC are potentially more at risk of slavery or human trafficking issues. If products have to be sourced from such locations, we will look favourably on suppliers who can demonstrate a commitment to human rights and fair working conditions, for example by way of certifications such as Social Accountability certification SA8000.

We will not work with any organisation that has been found to have been knowingly involved in either human trafficking or modern slavery.

### **Our effectiveness in combating slavery and human trafficking**

The Company Directors and Senior Management shall take the responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation within its supply chains.

We will continue to monitor and review our policy relating to slavery and human trafficking. If we become aware of any breaches of the policy, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 28<sup>th</sup> February 2022

**Director**  
**For and on behalf of O&H Strategic Land Holdings Limited and its Group companies**  
**1 June 2022**