

Modern Slavery Statement: Financial Year 2025

1. INTRODUCTION

1.1 - This statement sets out Oak Group Holdings Limited's ("Oak Group") actions to understand all potential modern slavery risks in relation to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its business and supply chains. This statement relates to actions and activities during the financial year to 31st July 2025, and covers the following UK entities

Oak Tyres UK Limited
Davanti Tyres Limited
Davanti World Limited
Ostles (Scotland) Limited
Concept Property UK Limited
Exhaust Tyres and Batteries (Worcester) Limited (Acquired 31/03/2026)

1.2 - Oak Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are proud of the steps we have taken to combat slavery and human trafficking. Oak Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

1.3 – Exhaust Tyres and Batteries (Worcester) Limited became part of the Oak Group on 31/03/2026. Following acquisition it is the groups intention to fully review the current policies and to align these with the wider group

2. ORGANISATION STRUCTURE

2.1 - All the companies held under the ultimate control of Oak Group, are specialists in the tyre wholesale and distributor market for passenger car and light commercial vehicle tyres.

3. OUR BUSINESS

3.1 - Oak Tyres UK Limited is primarily focused around the fit fast tyre industry within the UK with five main distribution hubs located within the North of England. Davanti World Limited and Davanti Tyres Limited are a global specialist distributor of tyres to a worldwide market. Concept Property UK Limited holds investment properties. Exhaust Tyres and Batteries (Worcester) Limited operates as a tyre wholesaler from four main distribution hubs and as a retailer in the South West and South Wales regions of the UK. Overall the group employs over 950 staff primarily in the UK with its head office based in Merseyside.

4. OUR SUPPLY CHAINS

4.1 - The Group's supply chain is comprised of suppliers throughout the world that provide a wide range of products and services related to the development, manufacturing, marketing and distribution of systems. The Group strives to do business with reputable suppliers committed to the Group's ethical standards and business practices. The Group has been awarded AEO accreditation by HMRC which is further evidence of the strength and security of our supply chain.

5. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

5.1 - 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.

6. RESPONSIBILITY

6.1 - Responsibility for Oak Group's anti-slavery and human trafficking initiatives lies with the following individuals/functions:

6.1.1 - Policies: The board of directors will review and authorise all policies agreed within the Group;

6.1.2 - Risk assessment: Risk assessments are continuously performed across all functions of the business and are audited and actioned upon by our internal audit team. These are reviewed monthly as part of our internal board meetings.

6.1.3 - Investigations/due diligence: The Group enlists the help of a number of specialist providers to investigate or ascertain risks and to ensure robust plans are formulated to manage these areas. Our representative office in China was specifically created to minimise and audit the risk within our supply chain from the Far East.

6.1.4 - Training: There is a dedicated and continual programme of training given to all staff to ensure that the standards and ethics of the business are maintained.

7. RELEVANT POLICIES

7.1 - The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

7.1.1 - Whistleblowing policy: Oak Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Oak Groups whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

7.1.2 - Employee Code of Conduct/Business Ethics: Oak Group's code makes clear to employees the actions and behaviour expected of them when representing the organisation. Oak Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

7.1.3 - Supplier Code of Conduct: The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. The Group employs specialist consultants and risk assessors to audit key suppliers.

7.1.4 - Recruitment policy: Oak Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

8. RISK ASSESSMENT AND DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

8.1 - As part of our initiative to identify and mitigate risk we have conducted an internal risk assessment to identify any practices which would constitute slavery or human trafficking within Oak Group. We have also engaged with our suppliers and/or subcontractors and asked them to complete a questionnaire to confirm their position on modern slavery and to identify any risk of slavery and human trafficking.

8.2 - We have in place systems to:

8.2.1 - Identify and assess potential risk areas in our supply chains.

8.2.2 - Mitigate the risk of slavery and human trafficking occurring in our supply chains.

8.2.3 - Monitor potential risk areas in our supply chains.

8.2.4 - Protect whistleblowers. These are highlighted via regular audits and visits to the factories we use either by Oak Group staff or via specialist third party providers such as our legal and financial advisors.

9. TRAINING

9.1 - 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, management and other relevant personnel.

10. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

10.1 - Oak Group has reviewed its key performance indicators in light of the introduction of the Modern Slavery Act 2015. As a result Oak Group:

10.1.1 - Requires all staff working procurement and HR to have completed training on modern slavery;

10.1.2 - Has developed a system for supply chain verification, whereby Oak Group evaluates potential suppliers before they enter the supply chain; and

10.1.3 - Reviews its existing supply chains, whereby Oak Group evaluates all existing suppliers.

10.2 - This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st July 2025.

This Statement is approved by the Board of Oak Group Holdings Limited

Peter Cross
Commercial Director

Date: 8 January 2026
Updated: 1 April 2026