

# **OHA HOLDINGS LIMITED: REPORT UNDER THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT**

*(For the financial year ended December 31, 2023)*

## **Introduction**

This report is submitted in accordance with Part 2 of the *Fighting against Forced Labour and Child Labour in Supply Chains Act* (the "Act") by OHA Holdings Limited ("OHA" or "our" or "we") for the financial year ending December 31, 2023.

## **Structure, activities and supply chains**

OHA is an investment holding company incorporated under the laws of New Brunswick.

OHA's primary activity is to manage its portfolio of investments, including cash, cash equivalents, bonds and various equity instruments, including a controlling interest in Irving Oil Company, Limited.<sup>1</sup> OHA's activities are predominantly financial in nature, focusing on managing and growing its portfolio of investments. We do not have employees in Canada and engage exclusively with professional service providers to carry out business activities.

## **Policies, due diligence processes and risk of forced labour or child labour**

OHA does not produce, sell or distribute goods in Canada or elsewhere, nor does OHA import into Canada goods produced outside of Canada. To the extent that any operating business we control have reporting obligations under the Act, those organizations separately report on their risks and compliance mechanisms.

We are not aware of any incidents of forced or child labour in OHA's operations during the reporting period. Given the nature of OHA's activities as an investment holding company, we consider the risk of forced labour or child labour in OHA's operations to be negligible.

OHA does not have specific policies or due diligence processes in place regarding forced labour and child labour. Our due diligence processes are oriented towards financial investment management and reporting in compliance with financial regulations.

## **Approval and attestation**

This report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of OHA.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for OHA. Based on my knowledge, and

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<sup>1</sup> In the financial year ended December 31, 2023, Irving Oil Company, Limited and its operating subsidiary, Irving Oil Limited (collectively, "Irving Oil") were reporting entities pursuant to Section 9 of the Act. Irving Oil will report separately from OHA.

having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A handwritten signature in blue ink, reading "Timothy J. Alvino", is written over a horizontal line.

**Timothy J. Alvino**  
**Director, OHA Holdings Limited**

*I have the authority to bind OHA Holdings Limited*

May 5, 2024