

Nexus Vehicle Management Ltd

Modern Slavery & Human Trafficking Policy



This statement sets out Nexus Vehicle Management Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Nexus is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. We take a Zero Tolerance approach to human rights violations of any kind within our business and network.

Organisational Structure and Supply Chains

Nexus Vehicle Management is a leading provider of vehicle rental supply and management systems to corporate and public sector users across the UK. Nexus' operating activities are based predominantly in the UK, with the ability to support international rental supply requirements via our global partners. Our supply chain is made up of more than 200 rental providers, including multi-national companies, as well as local, independent suppliers.

Nexus will regularly review our suppliers' operations across the globe in comparison with the Global Slavery Index (<http://www.globalslaveryindex.org>), coupled with guidance from the Chartered Institute of Procurement & Supply (CIPS) to assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking.

As Nexus' does not operate in countries considered high risk for slavery and human trafficking, we do not believe any of our activities to be at high risk of slavery or human trafficking.¹

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Our Board of Directors fully advocates this policy and will work closely with the Nexus' supply chain and senior management team to review, update and implement policies as required.
- **Risk Assessments:** risk will be assessed as part of our Supplier Appraisal process and commercial due diligence. Internal and supplier information, processes and sites will be audited regularly to ensure compliance with the Modern Slavery Act 2015. Additional investigations will be carried out where any instances of slavery or human trafficking are suspected.
- **Training:** Nexus includes detailed Equality and Diversity information within our employee induction process and company handbook. Any employees responsible for assessing supplier compliance with the Modern Slavery Act 2015 receive formal Ethics training via the Chartered Institute of Purchasing and Supply.

Relevant Policies

The following policies further describe Nexus' approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the Nexus supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

¹ Highest risk activities outlined in Global Slavery Index Report 2016 include Fishing, Small Street Commerce, Prostitution, Domestic Work, Factory Work, Hospitality and Agriculture.



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- **Employee Code of Conduct:** Nexus' code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct:** Nexus 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. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. Suppliers are regularly audited and site visits are conducted to ensure compliance with relevant legislation and service standards.
- **Recruitment Policy:** Nexus 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. Nexus has adopted the UK Living Wage as our standard within our business and supply chain.
- **Corporate Social Responsibility & Ethics Policies:** Nexus is committed to fair, ethical and sustainable working practices to ensure service excellence across our supply chain and customer base. Nexus is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in our own businesses and supply chains throughout our network.

Due Diligence

Nexus undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Nexus' due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits or assessments;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative, ethical and sustainable trading initiatives;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Nexus is committed to regular auditing of its supply chain to review existing QHSE compliance ethical practices.

Nexus warrants that it has thoroughly investigated its labour practices, and those of its direct suppliers, to ensure no slavery or forced labour is used anywhere in our organisation or supply chain. All necessary processes and procedures are in place as detailed herein, including investigation and compliance systems, will ensure that this will continue to be the case at all times.

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Training

Nexus requires all staff involved with HR and management of our supply chains within the organisation to complete adequate training on modern slavery and regular refresher training, via a recognised training partner, course or institution, such as the Chartered Institute of Purchasing and Supply.

As well as training staff, Nexus has raised awareness of modern slavery issues through email communication with staff and suppliers and by publishing our policies on this matter on our website.

This policy and our efforts to raise awareness and work collaboratively with our supply chain to comply with the Modern Slavery Act 2015 will be reviewed annually by the Board of Directors and to drive continuous improvement.

Signed

John Ellis
Managing Director
Dated 14/06/2018

Companies included on this policy:

- Saturn Topco Limited and all non-trading subsidiaries
- Nexus Vehicle Management Ltd
- Adapted Vehicle Hire Limited