

# Nexus Vehicle Management Ltd

## Modern Slavery & Human Trafficking Policy



### 1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### 2. About this policy

- 2.1 The purpose of this policy is to:
- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
  - (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
- 2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 3. Responsibility for the policy

- 3.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Compliance Committee has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern

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slavery. The effectiveness of the policy will be managed through the KPIs listed within the Modern Slavery Statement. Any concerns raised through the whistleblowing policy or any other grievance mechanism will be reported to the board as a KPI.

- 3.3 The Supply Chain team at Nexus manage all Suppliers closely in order to ensure compliance with both this policy and all related aspects of regulation and legislation. This is done through the use of the QHSE (Quality, Health, Safety and Environment) framework and regular audits.
- 3.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it. Management will track completion of this training for their direct reports.
- 3.5 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged by email and should be addressed to the Compliance Committee inbox.

#### 4. Your responsibilities and how to raise a concern

- 4.1 Nexus employees and those that work on our behalf must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify your manager **OR** the Compliance Committee as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect that a breach of this policy has occurred or that it may occur you must notify your manager or **OR** report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager in the first instance.
- 4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or



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in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

### 5. Training and communication

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the annual training for all individuals who work for us, and for those working in teams such as Supply Chain additional regular training will be provided.
- 5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis. Any Supplier that Nexus works with is managed closely by the Supply Chain team in order to ensure compliance with both this policy and all related aspects of regulation and legislation. This is done using the QHSE (Quality, Health, Safety and Environment) framework and management against the Nexus Service Level Agreement. Regular audits are carried out by the Supply Chain team on all Suppliers.

### 6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 Nexus employs a zero-tolerance attitude towards Modern Slavery and Human Trafficking and will terminate any relationship with individuals and organisations working on their behalf if they breach this policy and are unable to immediately remediate any issues. Strong confidence must be provided to Nexus that future issues will not arise for Nexus to consider any future dealings with such a party.

Signed

A handwritten signature in blue ink, appearing to read "Scott Haddow", on a light-colored background.

Scott Haddow

**CEO**

Dated 7<sup>th</sup> June 2023