



Ethics & Code of Conduct Policy

1. Purpose and Scope

This Ethics & Code of Conduct Policy sets out the fundamental principles and standards that guide the behaviour and actions of all employees, directors, contractors, agency workers, and other stakeholders acting on behalf of Nexus Vehicle Management (Nexus).

The policy applies to all aspects of our business operations and governs how we interact with customers, suppliers, partners and

We believe that the effective implementation of this policy:

- Fosters a culture of integrity and ethical behaviour
- Sets clear expectations and standards of conduct
- Supports good corporate governance and regulatory compliance
- Protects our customers, suppliers, employees and reputation

This policy operates alongside, and should be read in conjunction with, related policies including (but not limited to): Data Protection, Information Security, Anti-Bribery & Corruption, Whistleblowing, Equality & Diversity, Health & Safety, and Artificial Intelligence governance procedures.

2. Our Ethical Principles

We are committed to conducting business in accordance with the following core principles:

- Integrity and honesty
- Fairness and transparency
- Accountability and responsibility
- Respect for people and human rights
- Compliance with laws, regulations and industry standards
- Responsible innovation and use of technology - includes human oversight of AI-assisted decisions and compliance with EU AI Act.

3. Quality of Services

We are committed to providing high-quality vehicle rental business services that consistently meet or exceed customer expectation.

We aim to:

- Deliver reliable, accurate and timely services
- Act professionally and transparently in all customer dealings
- Continuously improve service quality and operational performance

We operate in line with the British Vehicle Rental and Leasing Association (BVRLA) Code of Conduct and all applicable legal and regulatory requirements.

4. Employees

Nexus values its employees as a key organisational resource and are committed to:

- Open communication, engagement and teamwork
- Equal opportunities for recognition, development and progression
- A working environment free from discrimination, bullying or harassment

We do not tolerate discrimination based on age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

We are committed to preventing child labour and will not employ any person deemed to be a child in any of our operations.

Recruitment, selection, reward and promotion are based on merit, competence, experience and alignment with our values and culture.

5. Customers

Everyone at Nexus plays a role in delivery high-quality and ethical services to our customers.

We commit to:

- Acting with integrity, professionalism and fairness
- Treating customers honestly and respectfully
- Protecting customer confidentiality and data
- Ensuring customers are treated fairly, including where automated or AI-supported processes are used. Automated decision-making will comply with GDPR: lawful basis, transparency rights and DPIAs for high-risk processing.

6. Suppliers

Nexus strives to build strong, long-term relationships with suppliers and partners based on mutual trust and professionalism.

We commit to:

- Paying suppliers in line with agreed terms.
- Selecting suppliers through fair and transparent processes
- Monitoring supplier performance against service, quality and compliance standards.

Supplier evaluation includes:

- Legal and regulatory compliance
- Commercial viability and continuity
- Service quality and performance
- Quality, Health, Safety and Environmental (QHSE) standards
- Ethical conduct, equality and human rights

7. Social Responsibility

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.

8. Human Rights and Modern Slavery

We are committed to preventing any violation of human rights, including child labour, forced labour, slavery and human trafficking.

Our Supply Chain Management team, led by our Supply Chain Director (a chartered member of the Chartered Institute of Procurement & Supply (CIPS), operates in accordance with CIPS guidelines. All suppliers are regularly audited and their performance is continuously monitored against service delivery KPIs.

Our team works with all suppliers to ensure that legal requirements are met or exceeded and suppliers are encouraged to subscribe to the UK Living Wage standard where possible, with UK minimum wages being the accepted minimum requirement.

Nexus will publish an annual Board-approved Modern Slavery Statement on our website, covering the six reporting areas.

9. Health and Safety

We provide safe and healthy working conditions to all employees and will do all that is reasonably practicable to:

- Protect the health and safety of employees and clients, and minimise any adverse effects on the environment;
- Implement working practices to prevent personal injury and damage to property; and
- Make all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others.

10. Environmental Responsibility

We recognise that environmental resources are finite and commit to responsible environmental management by:

- Working with others toward a consensus on environmental quality standards;
- Aiming to improve all aspects of the business in respect of environmental issues;
- Paying particular attention to environmental issues including the conservation of energy and natural resources and recycling of waste material; and
- Taking social and environmental factors into consideration alongside financial factors in procurement decisions.

11. Community Engagement

We are dedicated to supporting the community in which we operate by delivering services responsibly and efficiently, providing fair employment opportunities and considering national and local community interests.

12. Safeguarding of Vulnerable People

Nexus is committed to safeguarding children, young people and vulnerable adults who may come into contact with our services.

All concerns of allegations of abuse will be taken seriously and addressed promptly in accordance with our safeguarding and equality policies.

13. Conflicts of Interest, Bribery and Corruption

Bribery or political contributions are prohibited, and employees are required to avoid conflicts of interest and to disclose any that may arise. Employees must ensure that their actions remain unbiased by conflicts of interest and must comply with our Anti-Bribery & Corruption Policy.

14. Information Security and Data Protection

Nexus regards information for the purpose of its business as a corporate asset which must be safeguarded against unauthorised access, loss of availability, infringement and improper disclosure. We seek to ensure as far as is reasonably practicable, that this information is protected, in line with our ISO27001 certification. This includes intellectual property, such as innovations, trade secrets, technical information, product design, customers' information, etc.

Furthermore, we commit to taking all reasonable steps to ensure that all our partners, contractors and agents fully comply with the provisions of Data Protection legislation where they are processing any personal data (as defined by the Data Protection Act 2018) on behalf of Nexus or our clients.

15. Records

Honesty, completeness and accuracy of records is essential to our operations. All transaction records will be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. We prohibit the creation or maintenance of any unrecorded funds or assets.

16. Reporting Concerns and Whistleblowing (Speak Up)

Employees and stakeholders are encouraged to raise concerns about unethical behaviour, misconduct or breaches of this policy without fear of retaliation.

Concerns may be raised in line with our Whistleblowing Policy and will be investigated promptly and confidentially.

Signed,



Scott Haddow
Chief Executive Officer

Dated 29th December 2025