

A large, abstract graphic composed of overlapping, semi-transparent blue and grey geometric shapes, resembling a stylized wave or a series of connected planes. The shapes are layered, creating a sense of depth and movement. The colors range from light sky blue to a darker, muted blue, with grey accents on the edges and corners.

# Modern Slavery Policy

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# 1. Introduction

The Proximo Group is committed to conducting its business ethically and with integrity, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking do not take place anywhere within the business or its supply chains.

This policy sets out the expectations of The Proximo Group in relation to modern slavery and human trafficking and applies to all employees, workers, agency staff, contractors, consultants, suppliers and business partners. All relevant policies are available on the internal intranet and can also be accessed by contacting the HR Department.

## 2. Purpose

The purpose of this policy is to ensure fair, consistent and ethical treatment of all individuals working for, or on behalf of, The Proximo Group. The Group is committed to the principles of the Modern Slavery Act 2015 and to the prevention, detection and elimination of modern slavery, servitude, forced or compulsory labour and human trafficking.

As an equal opportunities employer, The Proximo Group is committed to creating and maintaining a non-discriminatory, respectful and safe working environment. We encourage an open culture where employees feel confident to raise concerns about wrongdoing, unlawful conduct or unethical practices without fear of retaliation.

Our recruitment and people management processes are designed to:

- Ensure all individuals are legally entitled to work in the UK
- Protect workers from abuse, exploitation or coercion
- Promote fair, transparent and ethical employment practices

The Proximo Group does not knowingly enter into business with any organisation, in the UK or overseas, that supports or is found to be involved in modern slavery, servitude, forced or compulsory labour, or human trafficking.

## 3. Policy Objectives and processes

The Proximo Group will continue to embed the principles of the Modern Slavery Act 2015 through the following measures:

- Providing appropriate awareness and training to employees on modern slavery and human trafficking, including guidance on how to identify potential indicators and the action to take if concerns arise
- Ensuring employees involved in procurement activities are aware of, and comply with, relevant modern slavery procurement guidance, including guidance published on GOV.UK

- Incorporating consideration of modern slavery risks and prevention measures into policy reviews and business processes, as both an employer and procurer of goods and services
- Ensuring procurement strategies, supplier due diligence processes and contractual terms include appropriate references to modern slavery and human trafficking
- Maintaining a zero-tolerance approach to modern slavery and human trafficking across all areas of the business
- Providing training on modern slavery and ethical employment practices to employees involved in recruitment, procurement, and the engagement or deployment of workers

## 4. Responsibilities

All employees are responsible for complying with this policy and for acting in good faith to support The Proximo Group's commitment to preventing modern slavery and human trafficking.

Employees must follow all relevant business procedures and immediately raise any concerns or suspicions of modern slavery or human trafficking. Concerns should be reported to a line manager, the HR Department, or via the Company's Whistleblowing Policy.

Managers have a responsibility to ensure this policy is communicated effectively, to remain alert to potential risks, and to escalate concerns appropriately.

Any failure to comply with this policy, related procedures, or to act in line with the Company's HEART values may result in disciplinary action in accordance with the Company's Disciplinary Policy.

## 5. Acknowledgment

All employees are expected to understand and comply with this policy as part of their employment with The Proximo Group. The policy will be communicated through induction, training and ongoing internal communications.

This policy will be reviewed regularly to ensure it remains effective, compliant with legislation, and aligned with best practice.