

Proximo Group - Modern Slavery Statement

About Us

Proximo Group is the UK's largest provider of adapted and wheelchair-accessible replacement vehicles, supporting major fleet operators and insurance providers nationwide. We deliver award-winning customer service and rapid response solutions that help keep drivers mobile and businesses operating with minimal disruption.

As an employee-owned organisation, our colleagues are personally invested in the quality of service we provide. We work in close partnership with clients, supplying specialist replacement vehicles and managing vehicle repairs either directly or on their behalf. Our focus is on practical solutions, clear communication, and getting people back on the road quickly and safely.

Our employee-ownership culture underpins our commitment to responsibility, care, and collaboration, ensuring we consistently deliver the right outcomes for every customer.

Our Supply Chains

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 (Transparency in Supply Chains) and covers the financial year ending 30th June 2026.

We rate our overall risk as low due to the nature of our services. We take a **zero-tolerance approach** to modern slavery and human trafficking. We are committed to acting ethically and transparently in all business dealings and to implementing effective systems and controls to safeguard against any form of exploitation. We recognise that modern slavery can occur in any sector and we are committed to regular reviews, improvement, and to acting swiftly and appropriately where concerns are identified.

Governance and accountability

Overall accountability for monitoring modern slavery sits with our senior leadership team. Our HR and Learning & Development business areas oversee all people policies and staff safeguarding training and support. Procurement activity is supported through our Key Accounts and Business Efficiency leaders, and our Key Account Lead is responsible for applying proportionate due diligence and escalating concerns.

We keep our controls under review to ensure they remain proportionate to our risk profile and aligned with relevant government guidance and good practice.

Proximo's commitment to the principles of the Modern Slavery Act 2015

We are committed to the principles of the Modern Slavery Act 2015, namely the abolition of modern slavery and human trafficking.

We are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff, as an equal opportunities employer. We believe all our staff should feel confident that they can expose wrongdoing without any risk to themselves and promote policies and practices to ensure this is the case.

Our recruitment processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees.

We do not enter business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our supply chain

We assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited, and we procure goods and services from a restricted range of UK suppliers, primarily through UK government frameworks.

Our supply chains are responsible for their own modern slavery statement, and we expect that they operate controls intended to help prevent modern slavery in relevant supply chains supporting its clients. These measures are reviewed, as necessary, by our Head of Sales and Head of Key Accounts.

Our policies in relation to the Modern Slavery Act 2015

The following policies are available to all staff through our Group Intranet:

- Code of conduct
- Whistleblowing policy
- Safeguarding Policy
- Sexual harassment policy
- Diversity, Equality and inclusion policy
- Recruitment policies
- Human Trafficking Policy

These policies set out expectations on all employees.

Due diligence in our operations and supply chains

Our due diligence is proportionate to our size, activities and risk profile and includes:

- using UK government frameworks that include modern slavery considerations in supplier selection
- including appropriate modern slavery and ethical employment training
- maintaining recruitment controls to help ensure workers are legally entitled to work in the UK and are treated fairly
- providing routes for staff to raise concerns, including through our Whistleblowing policy
- challenging abnormally low-cost tenders where appropriate to help ensure pricing does not rely on unethical labour practices

Risk assessment and management

We assess modern slavery risk when we procure goods and services, manage contracts and recruit staff. Our approach prioritises higher-risk areas (for example, logistics and

vehicle procurement) and considers factors such as the nature of the service and use of subcontractors. This includes:

- requiring suppliers to comply with applicable laws and our contractual expectations on ethical employment
- seeking assurance (where proportionate) on how suppliers prevent modern slavery in their own operations and supply chains
- using contract management to identify issues early (for example, through performance reviews and escalation routes)
- acting on concerns; investigating if required corrective action is needed, and considering termination for serious breaches

Embedding the principles

We will continue to embed the principles of the Modern Slavery Act 2015 through our policies, procurement and contract management, and learning and development. This includes:

- Providing modern slavery awareness training and guidance for staff.
- Ensuring staff involved in procurement are aware of and follow relevant government guidance on tackling modern slavery in supply chains.
- Reviewing relevant people and procurement policies so they continue to reflect modern slavery risks and prevention measures.
- Making sure our procurement strategies and contract terms include appropriate provisions.
- Maintaining a zero-tolerance approach and encouraging staff and suppliers to report concerns.
- Providing clear escalation routes for concerns to be raised.
- Working with suppliers, where appropriate, to promote good practice and improve visibility of modern slavery risks in relevant supply chains.

Measuring effectiveness

We will continue to review and use indicators to understand effectiveness, such as completion of relevant training.

If a member of staff suspects modern slavery or human trafficking connected with our operations or supply chains, they are encouraged to report it promptly through line management or our Whistleblowing/ internal policy routes. We will take concerns seriously, investigate appropriately, and work with relevant partners or authorities where required.

Our Risk & Compliance Team will oversee the Group's modern slavery risk framework, supplier due diligence processes, policy compliance, and escalation of identified risks through the corporate governance structure.

This statement has been approved by **Mary Murphy, Group HR and Customer Experience** Director, for the financial year ending 30th June 2026.

This statement will be reviewed and updated every year.

Signed on behalf of Proximo Ltd

A handwritten signature in dark ink, appearing to be 'Mary Murphy', written over a horizontal line.

HR & Customer Experience Director