



Modern Slavery Statement

Reporting period: 1 July 2025 - 30 June 2026

“We are committed to conducting business ethically and responsibly, and to taking appropriate and proportionate steps to prevent modern slavery, human trafficking, forced labour, and labour exploitation throughout our operations and supply chain.”

- *Stephan Surmont* - MD

Approved by

Stephan Surmont

Group Managing Director

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1. Introduction

Nationwide Holdings Ltd (NWVA) is committed to conducting all business activities in a lawful, ethical, and responsible manner. Modern slavery prevention forms part of the Group's governance framework and supports our commitment to integrity, accountability, responsible procurement, ethical employment practices, and corporate social responsibility.

This Statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and sets out NWVA's commitment to preventing modern slavery, servitude, forced labour, human trafficking, and labour exploitation within its operations and supply chain.

NWVA provides services within the automotive, recovery, and transport sectors, including:

- Roadside Recovery and Assistance Services
- Vehicle Transport Services
- Vehicle Repair and Bodyshop Services

The Group recognises that modern slavery risks may exist within wider supply chains, outsourced services, labour-intensive industries, and subcontracted activities. We are committed to maintaining appropriate and proportionate controls designed to identify, assess, and reduce these risks wherever reasonably practicable.

NWVA adopts a zero-tolerance approach to modern slavery and human trafficking and expects the same commitment from those who work for, with, or on behalf of the Group.

2. Scope

This Statement applies to Nationwide Holdings Ltd (NWVA) and its wholly owned subsidiaries.

It applies to all directors, managers, employees, agency workers, contractors, subcontractors, consultants, suppliers, and any third parties acting on behalf of the Group.

The Statement applies across all operational activities, including roadside recovery operations, transport services, vehicle repair activities, procurement functions, supplier management arrangements, contractor engagement, and supporting administrative activities.

Particular consideration is given to areas where Modern Slavery risks may be elevated, including outsourced labour-intensive services, temporary labour arrangements, subcontracted services, repair services, transport operations, waste management activities, and wider supply chain activities.

All persons working for or on behalf of NWVA are expected to support and comply with the commitments outlined within this Statement.

3. Statement

NWVA is committed to maintaining a working environment and supply chain that is free from modern slavery, forced labour, servitude, human trafficking, and labour exploitation.

We will conduct business with honesty, professionalism, transparency, and integrity, ensuring that ethical standards are maintained throughout our operations and business relationships.

The Group expects all employees, suppliers, contractors, and business partners to comply with applicable employment legislation, labour standards, and human rights obligations.

NWVA is committed to promoting fair employment practices, responsible business conduct, and ethical decision-making throughout the organisation.

Employees are expected to raise concerns where they identify actual or suspected unethical conduct, labour exploitation, or potential breaches of this Statement. The Group will treat all concerns seriously and take appropriate action where necessary.

NWVA will not knowingly engage with organisations or individuals involved in unlawful labour practices, labour exploitation, human trafficking, or human rights abuses.

4. Objectives

NWVA aims to:

- Prevent modern slavery, forced labour, servitude, human trafficking, and labour exploitation within the Group and associated supply chains.
- Promote ethical business conduct and responsible procurement practices.
- Support transparency, accountability, and lawful employment practices throughout the organisation.
- Maintain effective supplier governance and due diligence arrangements.
- Identify, assess, and manage risks associated with modern slavery and labour exploitation.
- Ensure employees understand their responsibilities relating to ethical conduct and reporting concerns.
- Support continual improvement in modern slavery prevention and supply chain governance.
- Protect the reputation, integrity, and operational resilience of the Group.
- Provide reasonable assurance to customers and stakeholders that appropriate efforts are being made to prevent Modern Slavery within our operations and supply chain.
- Support customers, clients, and stakeholders by demonstrating appropriate controls designed to prevent Modern Slavery within our operations and supply chain.

5. Principles

NWVA will apply the following principles across all business activities:

Modern slavery risks shall be considered as part of supplier onboarding, procurement activities, contractor engagement, and supplier management arrangements.

The Group will maintain supplier selection and onboarding processes that may include financial checks, business verification checks, supplier due diligence assessments, onboarding audits, compliance reviews, and contractual obligations requiring compliance with applicable employment and labour legislation.

Higher-risk suppliers may be subject to enhanced due diligence, monitoring, or audit activities where appropriate.

The Group will maintain proportionate due diligence processes designed to assess supplier suitability, business integrity, and compliance with applicable employment and labour requirements.

Annual risk assessments shall be undertaken to consider sector-specific Modern Slavery risks associated with our supply chain, including transport services, vehicle repair services, waste management activities, outsourced services, temporary labour arrangements, subcontracted activities, geographical sourcing considerations, and labour-rights exposure.

Fair recruitment and employment practices shall be maintained throughout the organisation, including appropriate right-to-work verification and compliance with applicable employment legislation.

Pre-employment screening, recruitment procedures, induction arrangements, labour monitoring processes, and fair pay practices shall be maintained to support ethical employment practices and reduce the risk of labour exploitation.

Employees will be provided with appropriate information, guidance, and awareness relating to ethical conduct, modern slavery risks, and reporting arrangements.

Modern Slavery awareness training shall be provided to employees, with enhanced awareness provided to managers, procurement personnel, and those involved in supplier management activities where appropriate.

The Group will maintain arrangements for reporting, recording, investigating, and addressing concerns relating to labour exploitation, unethical conduct, human rights abuses, and potential modern slavery risks.

This Statement is supported by the Group's wider governance framework, including the Equal Opportunities Policy, Whistleblowing Policy, Code of Conduct, Bribery & Corruption Policy, Conflicts of Interest Policy, and associated compliance procedures.

Modern slavery considerations shall form part of wider compliance monitoring, supplier reviews, internal audits, management reviews, and governance oversight activities where appropriate.

NWVA will support open communication and encourage employees, suppliers, contractors, and stakeholders to raise genuine concerns without fear of retaliation.

The Group will continue to develop its corporate social responsibility activities and support ethical business practices within the communities in which it operates.

The Group will cooperate appropriately with customers, suppliers, regulators, certification bodies, enforcement agencies, and other relevant stakeholders in matters relating to ethical business conduct and modern slavery prevention.

Annual reviews of policies, procedures, supplier performance, audit findings, training arrangements, legislative updates, and industry best practice will be undertaken to support continual improvement of the Group's Modern Slavery framework.

This Statement will be reviewed annually to ensure it remains suitable, effective, and aligned with the strategic direction, operational activities, supply chain arrangements, and legal obligations of the Group. A version of this document is published on our website.