

DHL Supply Chain UK Limited Modern Slavery Statement:

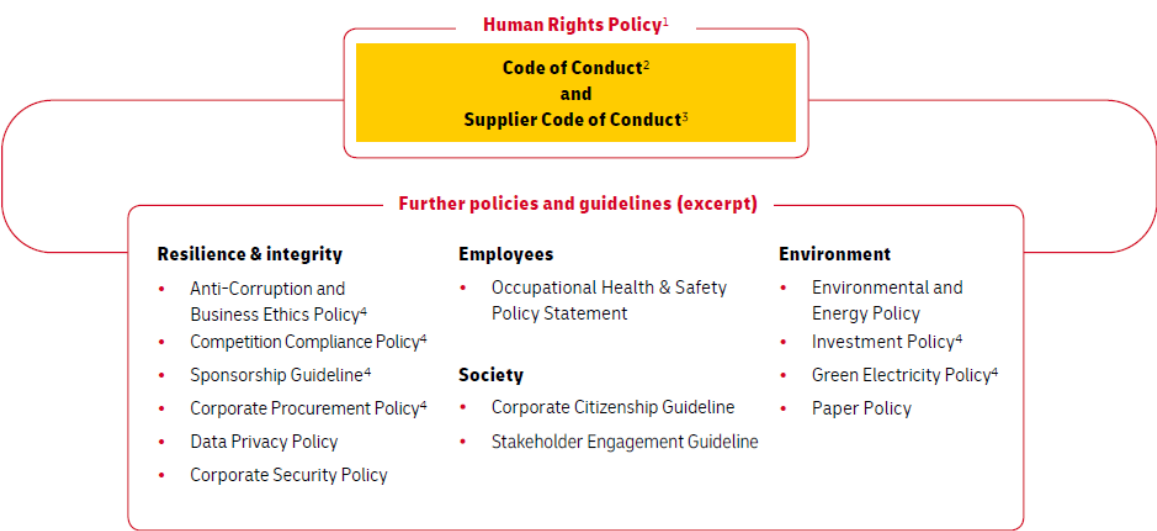
Overview and Business Structure

This statement is made by DHL Supply Chain UK Limited, DHL Services Limited, McGregor Cory Limited, Tradetteam Limited and Exel UK Limited (together referred to as “DHL Supply Chain UK”).

DHL Supply Chain UK provides a range of supply chain services to its customers, including value-add logistic solutions, e-commerce fulfilment, reverse logistics, procurement, co-packaging, distribution and managed transportation.

DHL Supply Chain UK is part of the Deutsche Post DHL Group (“the Group”) and is fully aligned with all Group policies and practices in relation to responsible business practice and human rights standards, including those in relation to forced labour, or modern slavery. The Group’s Human Rights Policy defines its minimum standards for fair working conditions and human rights in the Group’s employee and supplier relations. Taken together, our two codes – the Code of Conduct and the Supplier Code of Conduct constitute the Human Rights Policy. Both codes are regularly reviewed to ensure they are relevant, up to date and supplemented with new topics where necessary.

Deutsche Post DHL Group policies



The Group’s Code of Conduct is underpinned by key themes. These are: respect for human rights, equal opportunity, recruitment and employment, promoting health and safety in the workplace, transparency and an unequivocal stand against discrimination, bribery and corruption. They are based on the principles contained in the Universal Declaration of Human Rights, the ILO fundamental principles and rights at work and the UN Global Compact. The Code of Conduct is an integral component of employment contracts with DPDHL Group managers.

The Code of Conduct is available on the Group’s intranet in more than 20 languages. Employees participate in online compliance programmes about the Code and its application to everyday scenarios at work and when doing business; this learning also forms an integral part of the induction process.

The Group’s ethical and environmental values and principles are enshrined in its Supplier Code of Conduct which is a component of all Group contracts including its DHL Supply Chain UK contracts and its procurement contracts. In turn, this encourages suppliers to implement the same standards in their own supply chains. The Supplier Code of Conduct sets out what the Group means by respect for human rights and fair working conditions, in the same way as these are understood by its own employees. There are a number of areas covered including the extract below:

Forced labour

Suppliers shall not use any form of forced, bonded or involuntary labour.

Suppliers shall ensure that employees are not required to pay fees or make payments of any kind in return for employment. Punishments and physical and mental coercion are prohibited.

The Group has made the Supplier Code of Conduct available in 30 languages and also offers training courses on its use. The main content and requirements of the Code are outlined in an interactive module on the Group's website, a measure designed to promote and encourage a shared understanding of the Groups values and goals.

The Group's Employee Relations (ER) management system helps ensure consistent and effective implementation of its Human Rights Policy and common processes in the different countries and cultures which are represented throughout the Group. The ER management system aims to satisfy the requirements of the UN Guiding Principles on Business and Human Rights.

The main areas of risk in relation to modern slavery in DHL Supply Chain UK's operations have been identified as agency workers and other types of sub-contracted labour.

### **Due Diligence, Auditing and Training**

The Group's Code of Conduct and Supplier Code of Conduct e-learning modules are mandatory for all line managers and must be refreshed on a bi-annual basis. Procurement teams are expected to take steps to ensure that any supplier of labour has read and understood the Supplier Code of Conduct and will not be engaged unless they demonstrate that commitment in writing by accepting those terms. Only labour suppliers on an approved 'core-supplier' list may be used by DHL Supply Chain UK operations. This approved supplier list has been significantly reduced over the last two years to enable DHL Supply Chain UK to have greater visibility of its providers and monitor compliance more easily.

DHL Supply Chain UK utilises internal and external auditing capabilities to identify potential or actual risk and opportunity with its suppliers. Internal auditors are trained to SMETA standards and use an audit process aligned to the ETI base code requirements. Audits are scheduled following risk assessments based on volume of labour supplied and where second tier supply and beyond is identified.

To the date of this statement there have been no compliance issues raised in relation to modern slavery through these processes in DHL Supply Chain UK.

### **Whistleblower System**

DHL Supply Chain UK operates an anonymous 'Compliance Hotline' where employees are able to share concerns/issues outside of their normal reporting structures, including matters relating to labour practices or breaches of human rights. Any matter raised is investigated by an independent compliance team.

### **Future steps to prevent modern slavery in our supply chains:**

DHL Supply Chain UK will continue to monitor the modern slavery risk through continued risk assessment and due diligence, both in its own operations and labour suppliers. It will continue to monitor its labour suppliers' compliance with obligations committed to in the Supplier Code of Conduct through a continuous schedule of audits.

DHL Supply Chain UK will strive to increase general awareness of modern slavery in the UK and across the globe through continued training of its management teams and by encouraging its employees to highlight any concerns or potential evidence of modern slavery in its various forms.

The Group is currently developing a global standard framework to increase awareness of its obligations on Human Rights across all its operations and businesses. The framework includes a self-evaluation along with guidance on where to seek assistance should risks be identified. Part of the evaluation focuses on the risks around forced labour.

The Group is also actively seeking to engage with other organisations who may be able to assist with improving its policies and processes and who are willing to work together to identify opportunities to further address the challenge of modern slavery in the workplace.

DATE: JUNE 17 / 2019

DIRECTOR SIGNATURE:

NAME OF COMPANY: DHL Supply Chain UK Limited

DATE: 21 June 2019

DIRECTOR SIGNATURE:

NAME OF COMPANY: DHL Services Limited

DATE: 25/6/19

DIRECTOR SIGNATURE:

NAME OF COMPANY: McGregor Cory Limited

DATE: 25 JUNE, 2019

DIRECTOR SIGNATURE:

NAME OF COMPANY: Tradeteam Limited

DATE: 17/06/2019

DIRECTOR SIGNATURE:

NAME OF COMPANY: Exel UK Limited