

XPO Whistleblowing Policy in Europe

1. Purpose of the Policy

Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (the “**Directive**”) and the laws of the Member States transposing the Directive into national law have strengthened the protection of whistleblowers. These legal and regulatory developments require companies with at least 50 employees to establish a written internal procedure and specify its requirements. This obligation applies to XPO LOGISTICS EUROPE and its direct and indirect subsidiaries in the European Union as well as, in compliance with Article 17-II of Law No. 2016-1691 of December 9, 2016, commonly referred to as “Loi Sapin II”, subsidiaries in the United Kingdom, Ireland and Morocco (all companies established in Europe are hereinafter collectively and individually referred to as “XPO Europe”).

This internal procedure, which is specifically applicable to XPO Europe, amends and clarifies the “Additional Resources” procedure set forth in the XPO Code of Business Ethics (“**COBE**”).

All employees, committees, boards, councils of XPO Europe are encouraged to report possible issues, i.e. breaches – no matter by which person or body they were committed (whether internally or by third parties) – to the best of their knowledge. The purpose of this Policy is to provide a legally compliant framework for such reporting and appropriate protection of any person making a Report.

2. Scope of the Policy

2.1. Who can raise a concern under this Policy?

This Policy applies to all employees and executive bodies of XPO Europe, as well as to all employees and executive bodies of contractors, subcontractors, and suppliers of XPO Europe. For the purpose of this Policy, “employees” include trainees, full-time and part-time employees as well as temporary staff. “Employees” also includes persons whose employment or work-based relationship has been terminated, if the information on breaches was acquired in the course of that work-based relationship, and persons whose work-based relationship has not yet commenced, if the information was acquired during the recruitment process or other pre-contractual negotiations (“**Reporting Person**”).

A Reporting Person may only claim statutory whistleblower protection under the Policy if the Report is made in good faith and in compliance with this Policy. “Good Faith” means, that the Reporting Person had reasonable grounds to believe that the information on breaches reported was true at the time of reporting.

2.2. Which concerns can be raised under this Policy?

A Reporting Person can report any information they obtained in the context of their work-related activities, and which relates to:

- a recognized or threatened and imminent violation of law or legislation, particularly in the countries XPO Europe operates, including but not limited to:

- public procurement,
- financial services, products and markets and prevention of money laundering and terrorist financing,
- product safety and compliance,
- transport safety,
- protection of the environment,
- food and feed safety, animal health and welfare,
- public health,
- consumer protection,
- protection of privacy and personal data, and security of network and information systems etc.,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

Any attempt to cover-up evidence of violation of the laws and XPO's Code of Business Ethics Policy and XPO Business Ethics Policies can also be reported.

3. Reporting Process

3.1. Submission of a Report

The Reporting Person shall make their Report either in writing or orally (the “**Report**”), using one of the following channels:

3.1.1. Written Report

A Report can be made in writing through one of the following channels:

- EthicsPoint online: <http://www.xpo.ethicspoint.com/>

EthicsPoint is an information system operated by an external service provider on behalf of XPO Europe, which can be accessed via the Internet at all XPO Europe locations in accordance with Annex 1, 24 hours a day, 7 days a week. To the extent permitted by the law of the country in which the Report is received, EthicsPoint offers the opportunity to make a Report anonymously.

- Ethics Email : complianceOffice@xpo.com

If for any reason the Reporting Person is unable to connect to EthicsPoint Online and Ethics Hotline, he or she can also send an email to XPO's Ethics and Compliance Department at the following address: complianceoffice@xpo.com.

3.1.2. Oral Report

- Ethics Hotline

A Report can be made by calling the Ethics Hotline on the following numbers, depending on the country of the call:

Country	Ethics Hotline No:
Germany	0800-1808230

Spain	900-8-76071
France	0805-11-96-93
Ireland	1-800851846
Italy	800 72 5938
Luxembourg	800-2-7568
Morocco	855-840-0063
The Netherlands	0800-0249734
Poland	800005134
Portugal	800-181-348
Czech republic	800-144-559
Romania	0800-890-434
United Kingdom and Northern Ireland	0800-046-5497
Slovakia	0800-001-544

The Ethics Hotline is a toll-free telephone number operated by EthicsPoint. If permitted by the law of the country in which the Report is received, the Ethics Hotline may accept Reports anonymously.

- **Video Conference and physical meeting**

Where a Reporting Person requests a meeting (Video Call or physical meeting) with the Ethics and Compliance Department, he or she must send an email to the Ethics and Compliance Department at: complianceoffice@xpo.com. The meeting will then be organized during a reasonable period of time.

3.1.3. External Report

A Report can also be submitted to the external reporting channels of the competent national authorities.

3.2. Information

Except in the case where the Report is anonymous, the Reporting Person must provide information on their identity and confirm that he/she is qualified as a Reporting Person.

The Reporting Person receives an acknowledgement of receipt within seven days after the receipt of the Report.

3.3. Assessment of the admissibility of the Report

XPO Europe's Ethics and Compliance Department will verify whether the Report falls within the scope of the Policy (see Section 2.1 and Section 2.2 above).

For this purpose, XPO Europe's Ethics and Compliance Department may request further information from the Reporting Person.

If the Report does not meet the requirements of the Policy, the XPO Europe Ethics and Compliance Department will notify the Reporting Person accordingly.

In this case, the Data received will be kept only as long as necessary and mandated by applicable law and will then be deleted.

XPO Europe prohibits any form of retaliation against a Reporting Person who raises in good faith a concern about suspected or actual misconduct through any channel in accordance with the requirements of this Policy.

3.4. Handling and Processing of Reports

If the Report falls within the scope of this Policy, the Report will be handled by XPO Europe's Ethics and Compliance Department under strict confidentiality.

In order to assess the credibility of the allegations in the Report, the XPO Europe Ethics and Compliance Department may request further information from the Reporting Person.

Depending on the type of complaint, XPO Europe's Ethics and Compliance Department will either investigate the complaint and/or designate certain compliance personnel, which may include representatives from Legal or Human Resources, to investigate the breach and report back to XPO Europe's Ethics and Compliance Department. XPO Europe's Ethics and Compliance Department is responsible for ensuring that all questions and complaints about illegal conduct are addressed in accordance with this Policy and that all potentially viable or valid complaints about illegal conduct are properly documented.

XPO Europe's Ethics and Compliance Department will provide feedback to the Reporting Person in writing, within a reasonable period of time, and not exceeding three months from the date of acknowledgement of receipt of the Report.

3.5. Confidentiality

XPO Europe's Ethics and Compliance Department will treat the identity of the Reporting Person, the identity of the persons to whom the Report relates and the identity of all third parties mentioned in the Report, as well as the content of the Report, as confidential.

In this context, XPO Europe undertakes to ensure the confidentiality of such information, in particular by prohibiting access by XPO Europe employees or departments that have not been designated. Should non-designated personnel or departments receive such confidential information, they must immediately inform XPO Europe's Ethics and Compliance Department.

The identity of the Reporting Person can only be disclosed with the express consent of the Reporting Person. However, the identity of the Reporting Person and any other information mentioned in the Report may be disclosed only where this is a necessary and proportionate obligation imposed by applicable law.

The Reporting Person will be informed before their identity is disclosed to the national authorities, unless such information would jeopardize an investigation or judicial proceedings.

3.6. Documentation

Reports will be documented and kept no longer than necessary and appropriate.

3.7 – Non-Contractual nature of this Policy

This Policy does not form part of any contract of employment or other contract to provide services, and XPO Europe may amend it at any time.

Annex 1: Special features for individual XPO Europe companies

Czech Republic

For Czech Republic and thus for the following company of XPO Europe, the following special features apply:

Company	Registered Office	Country
XPO KEY PL EUROPE s.r.o.	U nakladoveho nadrazi 3146/6, Strasnice, 130 00 Praha 3 Nagano Park 1	CZECH REPUBLIC

2.2 Which concerns can be raised under this Policy?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates to the following can be reported:

- a recognized or threatened and imminent injury:
 - of a criminal offence,
 - an administrative offence sanctioned by law with a fine of at least CZK 100,000
 - of regulations of the European Union on the field of:
 - public procurement,
 - financial services, products and markets and prevention of money laundering and terrorist financing,
 - product safety and compliance,
 - transport safety,
 - protection of the environment,
 - food and feed safety, animal health and welfare,
 - public health,
 - internal order and security and life and health,
 - consumer protection,
 - protection of privacy and personal data, and security of network and information systems etc.,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

The (attempted) cover-up of evidence of the above-mentioned breaches can also be reported.

3.1.2 Oral Report

- **Video Conference and physical meeting**

Where a Reporting Person requests a meeting (Video Call or physical meeting) with the Ethics and Compliance Department, he or she must send an email to the Ethics and Compliance Department at: complianceoffice@xpo.com. The meeting will then be organized during a reasonable period of time. If the Report Persons requests a physical meeting, the physical meeting shall take place not later than 14 days after the request.

3.4 Handling and Processing of Reports

XPO Europe's Ethics and Compliance Department will provide feedback to the Reporting Person in writing, within thirty days after the acknowledgment of receipt. In cases that are factually or legally complicated, this deadline may be extended by up to thirty days, but not more than twice. The Reporting Person will be informed in writing of the extension of the deadline and the reasons for it before the deadline expires.

France

For France and thus for the following companies of XPO Europe, the following special features apply:

Company	Registered Office	Country
XPO LOGISTICS EUROPE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
CENTRALE DES FRANCHISES XPO FRANCE (SCA)	3 rue du Pressoir Chevalier 02880 Crouy	FRANCE
IMMOTRANS (SARL)	192 avenue Thiers 69006 Lyon	FRANCE
OMEGA XXVII (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
OMEGA XXVIII (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
TDG LOGISTICS (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO CONTROL TOWER SOLUTIONS (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO DISTRIBUTION EUROPE FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO DISTRIBUTION FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO FORMATION FRANCE (SNC)	192 avenue Thiers 69006 Lyon	FRANCE
XPO GLOBAL FORWARDING FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO GLOBAL FORWARDING INTERNATIONAL (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO IT EUROPE (SNC)	192 avenue Thiers 69006 Lyon	FRANCE
XPO KEY PL EUROPE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LAST MILE FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS CENTRE FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS CHAMPAGNE FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS EST FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS EUROPE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS ILE DE FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE

XPO LOGISTICS NORD FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS OUEST FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS RHONE-ALPES FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO LOGISTICS SUD FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO MAINTENANCE FRANCE (SNC)	192 avenue Thiers 69006 Lyon	FRANCE
XPO PHARMA FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO SERVICES EUROPE (SARL)	192 avenue Thiers 69006 Lyon	FRANCE
XPO SERVICES FRANCE (SNC)	192 avenue Thiers 69006 Lyon	FRANCE
XPO SUPPORT SERVICES FRANCE (SNC)	192 avenue Thiers 69006 Lyon	FRANCE
XPO TANK CLEANING NORD FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO TANK CLEANING SUD FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO TRANSPORT LOCATION FRANCE (SNC)	192 avenue Thiers 69006 Lyon	FRANCE
XPO VOLUME FRANCE NATIONAL (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO VOLUME FRANCE REGIONAL (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO VOLUME FRANCHISE FRANCE (SARL)	192 avenue Thiers 69006 Lyon	FRANCE
XPO VOLUME MGCA FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO VOLUME OUEST FRANCE (SAS)	192 avenue Thiers 69006 Lyon	FRANCE
XPO VRAC FRANCE (SARL)	192 avenue Thiers 69006 Lyon	FRANCE

2.1 Who can raise a concern under this Policy?

A Reporting Person may only claim statutory whistleblower protection under the Policy if the report is made without financial consideration, in good faith and in compliance with this Policy. „Good Faith“ means, that the Reporting Person had reasonable grounds to believe that the information on breaches reported was true at the time of reporting.

2.2 Which concerns can be raised under this Policy?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates to the following can be reported:

- a recognized or threatened and imminent injury
 - of a criminal offence or misdemeanor,

- a threat or harm to the general interest,
- a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France,
- a unilateral act of an international organization taken on the basis of such a commitment,
- of European Union law,
- of a law or regulation,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

Please note that in France, the personal scope of the protected persons assisting the whistleblower in making the report also includes non-profit legal persons (trade unions and associations) who are in contact with the reporting person.

Germany

For Germany and thus for the following company of XPO Europe, the following special features apply:

Company	Registered Office	Country
XPO TRANSPORT SOLUTIONS GERMANY GMBH	Nikolaus - Otto - StraBe 6 46282 Dorsten	GERMANY

2.2 Which concerns can be raised under this Policy ?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates to the following can be reported:

- a recognized or threatened and imminent injury of law or legislation, particularly in the countries XPO Europe operates, and which affects, for example, the following areas:
 - public procurement,
 - financial services, products and markets, and prevention of money laundering and terrorist financing,
 - product safety and conformity,
 - transport safety,
 - protection of the environment,
 - radiation protection and nuclear safety,
 - food and feed safety; animal health and welfare,
 - public health,
 - consumer protection, as well as
 - protection of privacy and personal data, and security of network and information systems.
- laws or statutory regulations that are subject to criminal penalties,
- laws or statutory regulations that are subject to a fine, insofar as the violated provision serves to protect life, limb or health or to protect the rights of employees or their representative bodies,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

The (attempted) cover-up of evidence of the above-mentioned breaches can also be reported.

3.1.3 External report

In Germany, the Reporting Person can submit a Report to the following external reporting channels:

- Federal Office of Justice (Bundesamt für Justiz):
 - responsible for all Reports concerning the above-mentioned areas,
 - a Report can be submitted online using the following link <https://formulare.bfj.bund.de/ffw/form/display.do?%24context=84E827E3DB32206A60CF>
- German Federal Cartel Office (Bundeskartellamt):
 - responsible for all Reports concerning German and European Antitrust Law,
 - a Report can be submitted online using the following link <https://www.bkms-system.net/bkwebanon/report/channels?id=bkarta&language=ger>
- Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht):
 - responsible for all reports concerning Banks and Financial Service Providers,
 - a Report can be submitted online using the following link https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html

Italy

For Italy and thus for the following company of XPO Europe, the following special feature apply:

Company	Registered Office	Country
XPO TRANSPORT SOLUTIONS ITALY S.R.L.	Via Vittor Pisani 16 cap 20124 Milano (MI)	ITALY

2.2 Which concerns can be raised under this Policy ?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates to the following can be reported:

- a recognized or threatened and imminent injury of national regulations that harm the public interest or integrity of public administrations or private entities and which consist of:
 - administrative, accounting, civil or criminal offenses; or
 - unlawful conduct relevant under Decree Legislative Decree No. 231 of June 8, 2001, or violations of the models of organization and management provided therein.
- a recognized or threatened and imminent injury of the European Union on the field of:
 - public procurement,
 - financial services, products and markets, and prevention of money laundering and terrorist financing,
 - product safety and conformity,
 - transport safety,
 - protection of the environment,
 - radiation protection and nuclear safety,
 - food and feed safety; animal health and welfare,
 - public health,
 - consumer protection;,, as well as

- protection of privacy and personal data, and security of network and information systems.
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies (Anti-Corruption; Antitrust and Fair Competition; Trade Compliance; Third Party Due Diligence; Insider Trading; Human Trafficking).

The (attempted) cover-up of evidence of the above-mentioned breaches can also be reported.

Morocco

For Morocco and the company indicated below, the following special features apply:

Company	Registered Office	Country
XPO TRANSPORT SOLUTIONS MOROCCO SARL d'AU	Avenue Arabie Saudite, s/n°. Office Center, Batiment Ichrak, 5eme Etage. CT 90.000 - Tanger	MOROCCO

2. Scope of the policy

2.1 Who can raise a concern under this Policy?

This Policy applies to all employees and executive bodies of XPO Europe, as well as to all employees and executive bodies of contractors, subcontractors and suppliers of XPO Europe. For the purpose of this Policy, “employees” include trainees, full-time and part-time employees as well as temporary staff. “Employees” also includes persons whose employment or work-based relationship has been terminated, if the information on breaches was acquired in the course of that work-based relationship, and persons whose work-based relationship has not yet commenced, if the information was acquired during the recruitment process or other pre-contractual negotiations (“**Reporting Person**”).

A Reporting Person may only claim statutory whistleblower protection under the Policy if his or her whistleblowing is done in good faith, in accordance with this Policy and he or she has justified reasons. „Good Faith“ means, that the Reporting Person had reasonable grounds to believe that the information on breaches reported was true at the time of reporting.

A Reporting Person who claims statutory whistleblower protection under this Policy is also protected by:

- the African Union Convention on Preventing and Combating Corruption dated July 11th, 2003 (Article 5, paragraphs 5 and 6),
- the United Nations Convention against Corruption (article 32, article 33 paragraphs 1 and 4),
- chapter 3 of Law n° 37-10 amending and supplementing law n°22-01 on criminal procedure (“**Moroccan Code of Criminal Procedure**”) and the protection of victims, witnesses, experts and whistle-blowers with regard to offences of corruption, embezzlement, influence peddling and others.

2.2 Which concerns can be raised under this Policy?

A Reporting Person can report any information they obtained in the context of their work-related activities and which relates to:

- a recognized or threatened and imminent violation of law or legislation, particularly in the countries XPO Europe operates, including but not limited to:
 - bribery,
 - influence peddling,
 - misappropriation,
 - embezzlement,
 - money laundering, and
- any of the crimes provided for in article 108 of the Moroccan Code of Criminal Procedure (undermining state security, terrorism, criminal conspiracy, murder, poisoning, kidnapping, hostage-taking, counterfeiting or falsification of currency or public credit instruments, offences relating to narcotics, weapons, ammunition, explosives or health protection).
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

Any attempt to cover-up evidence of violation of the laws and XPO's Code of Business Ethics Policy and XPO Business Ethics Policies can also be reported.

For the avoidance of doubt: a Reporting Person will be offered the protection of the relevant Moroccan legislation only in the case the report relates to bribery, influence peddling, misappropriation, embezzlement, money laundering, and/or any of the crimes provided for in article 108 of the Moroccan Code of Criminal Procedure AND a report is filed with the relevant authorities in Morocco.

3.1.3 External report

The Reporting Person may refer the case to the criminal court in accordance with the provisions of the Moroccan Code of Criminal Procedure.

Portugal

For Portugal and thus for the following company of XPO Europe, the following special feature apply:

Company	Registered Office	Country
XPO TRANSPORT SOLUTIONS PORTUGAL LDA	Centro Empresarial de Canelas, Rua da Misericordia, lote 7, 4410-236 Canelas	PORTUGAL

2.2 Which concerns can be raised under this Policy ?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates to the following can be reported:

- a recognized or threatened and imminent injury of law or legislation, particularly in the countries XPO Europe operates, and which affects, for example, the following areas:
 - public procurement,
 - financial services, products and markets and prevention of money laundering and terrorist financing,
 - product safety and compliance,
 - transport safety,
 - protection of the environment,
 - food and feed safety, animal health and welfare,

- public health,
- consumer protection,
- protection of privacy and personal data, and security of network and information systems etc.,
- violent crime, especially violent and highly organized crime,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

The (attempted) cover-up of evidence of the above-mentioned breaches can also be reported.

Slovakia

For Slovakia and thus for the following company of XPO Europe, the following special feature apply:

Company	Registered Office	Country
XPO TRANSPORT SLOVAKIA s.r.o.	Seredska 247/4012, 917 05 Trnava	SLOVAKIA

2.2 Which concerns can be raised under this Policy ?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates the following can be reported:

A "serious anti-social behavior" that constitutes the following illegal conduct:

- criminal offences of
 - Offenses under § 168, § 170, § 170b, § 177, § 212, § 213, § 217, § 221, § 226, § 233a, § 237 to 240, § 243, § 243a, § 247, § 247d, § 251a, § 252 to 254, § 261 to 263, § 266 to 268, § 271, § 278a, § 283, § 299a, § 302, § 305, § 326 to 327a, § 328 to 336b, § 336d, § 348, § 352a, or § 374 of the Slovak Criminal Code,
 - criminal offences for which the Slovak Criminal Code imposes imprisonment with the upper level of more than 2 years, or
 - administrative offences for which a fine with upper level determined by calculation can be imposed, or
 - administrative offences for which a fine with upper level of at least EUR 30,000 can be imposed."
- "other antisocial behavior" which means an administrative offence or other action that is not an administrative offence but has a negative effect on the society.
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

The (attempted) cover-up of evidence of the above-mentioned breaches can also be reported.

Spain

For Spain and thus for the following companies of XPO Europe, the following special feature apply:

Company	Registered Office	Country
XPO GLOBAL FORWARDING SPAIN S.L.	Calle San Vicente n°8 – Edificio Albia II, 3°B – 48001 Bilbao	SPAIN
XPO TRANSPORT SOLUTIONS HOLDING SPAIN S.L.	Barrio San Martin s/n Santander 39011 Cantabria	SPAIN

XPO TRANSPORT SOLUTIONS SPAIN S.L.	Barrio San Martin s/n Santander 39011 Cantabria	SPAIN
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2.2 Which concerns can be raised under this Policy?

Under this Policy any information obtained by the Reporting Person in the context of his or her work-related activities which relates to the following can be reported:

- a recognized or threatened and imminent injury:
 - of a serious or very serious infringement of criminal or administrative law, including those entailing a financial loss for Spanish tax and social security authorities,
 - of regulations of the European Union on the field of:
 - public procurement,
 - financial services, products and markets and prevention of money laundering and terrorist financing,
 - product safety and compliance,
 - transport safety,
 - protection of the environment,
 - food and feed safety, animal health and welfare,
 - public health,
 - consumer protection,
 - protection of privacy and personal data, and security of network and information systems etc,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

The (attempted) cover-up of evidence of the above-mentioned breaches can also be reported.

United Kingdom

For United Kingdom and thus for the following companies of XPO Europe, the following special features apply:

Company	Registered Office	Country
00280879 LIMITED	The Offices of BDO LLP 125 Colmore Row Birmingham B3 3SD	UK
CLEVELAND TANKERS LIMITED	The Offices of BDO LLP 125 Colmore Row Birmingham B3 3SD	UK
HARRIS DISTRIBUTION LIMITED	Distribution House Eldon way - Crick Northampton, Northamptonshire - NN6 7SL	UK
HOPKINSON TRANSPORT (CHESTERFIELD) LIMITED	Distribution House Eldon way - Crick Northampton, Northamptonshire - NN6 7SL	UK

LAMBDA 6 LIMITED	Distribution House Eldon way - Crick Northampton, Northamptonshire - NN6 7SL	UK
SALVESEN LOGISTICS HOLDINGS LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
SALVESEN LOGISTICS LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
TDG (UK) LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
TDG (VICTORIA) LIMITED	The Offices of BDO LLP : 125 Colmore Row - Birmingham - B3 3SD	UK
TDG LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO BULK UK LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO GLOBAL FORWARDING UK LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO HOLDINGS UK AND IRELAND LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO INVESTMENT UK LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO LOGISTICS GROUP LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO LOGISTICS TRUSTEES LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO MAINTENANCE UK LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK
XPO TRANSPORT SOLUTIONS UK LIMITED	Distribution House - Eldon way - Crick - Northampton, Northamptonshire - NN6 7SL	UK

2.1. Who can raise a concern under this Policy?

This Policy applies to all employees and executive bodies of XPO Europe, as well as to all employees and executive bodies of contractors, subcontractors and suppliers of XPO Europe. For the purpose of this Policy, “employees” include trainees, full-time and part-time employees as well as temporary staff. “Employees” also includes persons whose employment or work-based relationship has been terminated, if the information on breaches was acquired in the course of that work-based relationship,

and persons whose work-based relationship has not yet commenced, if the information was acquired during the recruitment process or other pre-contractual negotiations ("**Reporting Person**").

A Reporting Person may claim statutory whistleblower protection under the Policy if the Reporting Person has a reasonable belief that the Report is in the public interest.

2.2 Which concerns can be raised under this Policy?

A Reporting Person can report any information they obtained – It may, for example, concern the conduct of the employer, an employee, or some third party – which relates to:

- a recognized or threatened and imminent violation of law, legal obligation or legislation, particularly in the countries XPO Europe operates, including but not limited to:
 - public procurement,
 - a miscarriage of justice,
 - criminal activity,
 - financial services, products and markets and prevention of money laundering and terrorist financing,
 - product safety and compliance,
 - transport safety,
 - protection of the environment,
 - food and feed safety, animal health and welfare,
 - public health and health and safety,
 - consumer protection,
 - protection of privacy and personal data, and security of network and information systems etc.,
- a behavior or situation that violates XPO's Code of Business Ethics Policy and XPO Business Ethics Policies that can be found here ethics.xpo.com.

Any attempt to cover-up evidence of violation of the laws, XPO's Code of Business Ethics Policy, XPO Business Ethics Policies or any of the points mentioned above can also be reported.

3.3 Assessment of the admissibility of the Report

XPO Europe prohibits any form of retaliation against a Reporting Person who raises a concern about suspected or actual misconduct through any channel in accordance with the requirements of this Policy if they have a have a reasonable belief that the Report is in the public interest.