



XPO Logistics – Slavery and Human Trafficking Statement for the year ending 31st December 2024

Our Commitment:

This statement is issued by XPO Transport Solutions UK Limited, XPO Maintenance UK Limited, XPO Global Forwarding UK Limited, and XPO Bulk UK Limited (collectively referred to as "XPO"). These entities operate in the UK as part of the XPO group of companies. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and serves as XPO's slavery and human trafficking statement for the financial year spanning 1 January to 31 December 2024.

At XPO, our culture revolves around teamwork and achieving results through collaboration, which demands adherence to the highest standards of ethical business conduct. As a global leader in our industry, we strive to set an exemplary standard that is beyond reproach. We fully acknowledge our responsibility to take a proactive and resolute stance against slavery and human trafficking, and we are steadfast in our commitment to combating these issues through our practices.

Our commitments include:

- Acting with integrity in all business dealings
- Treating one another with dignity and respect
- Complying with all relevant policies, laws, and regulations
- Adhering to the standards outlined in the XPO Logistics Code of Business Ethics ("COBE").

XPO is dedicated to conducting business in a way that upholds human rights and respects the dignity of all individuals. In alignment with the Modern Slavery Act 2015 (the "MSA"), we recognise our responsibilities and adopt a zero-tolerance policy towards practices that contribute to, enable, or perpetuate human trafficking, forced or compulsory labour, child labour, or any other forms of human rights abuses.

Business Structure

XPO, Inc. (NYSE: XPO) is a leader in asset-based less-than-truckload (LTL) freight transportation in North America. The company's customer-focused organization efficiently moves 18 billion pounds of freight per year, enabled by its proprietary technology. XPO serves approximately 52,000 customers with 610 locations and 39,000 employees in North America and Europe, with headquarters in Greenwich, Conn., USA.

Within Europe, XPO employs approximately 14,480 people as drivers, warehouse staff and in corporate positions in 14 countries, including the Czech Republic, France, Germany, Ireland, Italy, Luxembourg, Morocco, Netherlands, Poland, Portugal, Romania, Slovakia, Spain, and the United Kingdom.

Within the UK and Ireland, we have four main operating companies employing approximately 5274 permanent employees at the end of 2024.

XPO's Operations and Supply Chains

We provide end-to-end supply chain solutions within the UK and Ireland, including freight brokerage, global forwarding, customs clearance, domestic transport, warehousing, last mile, and value-added services.

Our supply chains are extensive, given the global reach of our operations. Key areas within the supply chain include labour (including subcontract labour and agency workers), warehousing and transport facilities, vehicles, and equipment.

European Risk Committee

A European Risk Committee (ERC) has been formed to assess company risks and implement measures to control or eliminate them. This includes focusing on areas such as human rights, health and safety, environmental concerns, as well as modern slavery and human trafficking risks. The committee conducts these assessments biannually.

Steps to Prevent Modern Slavery in Our Supply Chains

XPO has implemented measures to ensure transparency in how we conduct our business, ensuring that all transactions and relationships align with our obligations under the Modern Slavery Act (MSA). Our compliance efforts are concentrated in three key areas: policy development, risk assessment, and due diligence.

Our ongoing priority has been to safeguard our employees and all individuals interacting with our business.

In the UK, we have undertaken the following actions to address slavery and trafficking:

Policy

At XPO, we are committed to respecting human rights and ensuring that everyone who interacts with our business is treated with dignity. These values are outlined in the Code of Business Ethics (COBE), which defines the company's standards for ethical behaviour and is actively supported and promoted by XPO's Ethics and Compliance department.

The COBE, last updated in 2024, is complemented by additional policies, including a global Human Trafficking policy and a UK-specific Anti-Slavery and Human Trafficking policy. The UK-specific policy applies to all XPO employees, officers, directors, and external partners, such as suppliers and contractors, involved in our UK operations.

To ensure understanding and compliance, the COBE and related policies are communicated to employees upon joining XPO. Throughout their employment, we provide continuous training on the COBE and its associated policies. Additionally, workplace harassment prevention training is delivered globally to increase awareness across our operations.

In the UK, all new managers are required to complete an Anti-Slavery and Human Trafficking online training module as part of their induction. In 2024, we introduced and integrated new Modern Slavery Awareness training for all managers and updated the new employee induction program. Alongside mandatory training for new managers, this training is made available to all UK employees via our "XPO University" learning management platform. As in previous years, all employees were also required to complete the annual COBE training in 2024.

Risk Assessment

Through our ongoing risk assessment, we have identified that the recruitment of subcontract labour and agency workers represents the highest potential exposure to human trafficking and modern slavery. This risk also extends to our use of business partners and subcontractors.

To mitigate these risks, we have implemented robust procurement practices, ensuring we only engage with approved suppliers who undergo thorough checks, scrutiny, and formal contractual agreements. These checks include the verification of supplier arrangements to prevent any association with human trafficking or modern slavery.

We work in collaboration with our Managed Service Provider (MSP), Neuen, to conduct regular audits. These audits ensure compliance with instructions regarding basic and premium pay rates and verify that all right-to-work documentation is in place, meeting legal requirements.

All work carried out in the UK and Ireland adheres to established statutory regulations concerning Health and Safety and Environmental Protection, supported by specific company policies.

In addition, all new employees at XPO undergo rigorous right-to-work checks using RightCheck, an application verified by the Home Office. Regular payroll checks are also conducted to identify potential indicators of modern slavery, such as shared bank accounts or account names that do not align with the individual. If any concerns arise, these are handled sensitively with line managers to assess and address any potential risks to the individual.

Due Diligence

Supplier appointments at XPO are managed centrally by a dedicated procurement team, ensuring a consistent approach and effective control over the engagement of agency labour. In 2024, we enhanced our supplier processes by introducing the European Code of Conduct (CoC), providing clear and unambiguous expectations. To ensure transparency, the CoC document was shared with over 200 long-standing major XPO supply partners, who provided positive feedback upon receipt.

The process for appointing transportation subcontractors has also been standardised, offering improved knowledge and oversight of the third parties we collaborate with.

At XPO, we are committed to ensuring that all temporary workers have a free choice of payroll method, with a declaration to this effect retained in their personnel records. XPO reserves the right to audit all engaged agencies, incorporating the declaration as part of the protocol. This guarantees that temporary and subcontract workers are treated and paid in accordance with the law.

We regularly review compliance with the Agency Worker Regulations, focusing on parity of pay and conditions for temporary workers on assignments lasting 12 weeks or more. By comparing the terms and conditions of XPO full-time employees with those of agency colleagues, we ensure fair treatment for all.

Through our partnership with a Managed Service Provider (MSP), we have consolidated our preferred supplier list, engaging only market-leading agencies with national reach. This approach has streamlined communication lines, enabling more efficient monitoring of compliance. In 2023, we reduced the number of MSP agencies by 35%, and by 2024, over 90% of XPO's temporary labour expenditures were managed through just 15 recruitment partners.

Future Steps to Prevent Modern Slavery in Our Supply Chains

XPO remains committed to proactively monitoring and addressing modern slavery risks through policy enforcement, risk assessments, training initiatives, and due diligence. Our planned actions include:

- **Updating Policies and Conduct Guidelines:** We will regularly review and enhance our Third-Party Due Diligence Policy and Supplier Code of Conduct to ensure they remain thorough and up-to-date. Additionally, we will continue auditing our sites to confirm that recruitment is conducted exclusively through approved agencies and subcontractors.
- **Enhanced Training Programs:** Through our “XPO University” learning management platform, we will deliver ongoing and mandatory training on modern slavery and human trafficking, ensuring consistent awareness among all employees.
- **Improved Induction Materials:** We will routinely update our new employee induction presentations and materials to include comprehensive guidance on human trafficking, fostering increased understanding and awareness across the workforce.

Any concerns regarding human trafficking or modern slavery within our business should be reported to ComplianceOffice@xpo.com or www.xpo.ethicspoint.com.

The Boards of XPO Transport Solutions UK Limited, XPO Global Forwarding UK Limited, XPO Maintenance UK Limited and XPO Bulk UK Limited approved this statement.

Signed:



Dan Myers
Managing Director
XPO Transport Solutions UK Limited



Dan Myers
Managing Director
XPO Bulk UK Limited



Dan Myers
Managing Director
XPO Maintenance UK Limited



Dan Myers
Managing Director
XPO Global Forwarding UK Limited