



XPO Logistics – Slavery and Human Trafficking Statement for the year ending 31<sup>st</sup> December 2025

**Our Commitment**

This statement is issued on behalf of XPO Transport Solutions UK Limited, XPO Maintenance UK Limited, XPO Global Forwarding UK Limited, and XPO Bulk UK Limited (together referred to as "XPO"). These companies operate in the United Kingdom as part of the wider XPO group. This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes XPO's slavery and human trafficking statement for the financial period from 1 January to 31 December 2025.

At XPO Logistics, our culture is underpinned by teamwork and delivering results through collaboration. This requires the highest standards of ethical behaviour in all aspects of our business. As a global industry leader, we are committed to setting exemplary standards of conduct. We recognise our responsibility to take a firm and proactive approach to preventing slavery and human trafficking and are resolute in addressing these risks through our practices.

We are committed to:

- Conducting all business activities honestly and with integrity
- Treating everyone with dignity and respect
- Complying with all applicable laws and regulations
- Upholding the principles and requirements of the XPO Logistics Code of Business Ethics ("COBE")

XPO Logistics is committed to operating responsibly, with respect for human rights and the dignity of all individuals. In line with the Modern Slavery Act 2015 ("MSA"), we maintain a zero-tolerance approach to slavery, human trafficking, forced or compulsory labour, child labour, and all forms of human rights abuse.

**Business Structure**

XPO, Inc. (NYSE: XPO) is a leading provider of asset-based less-than-truckload (LTL) freight transportation services in North America. Supported by proprietary technology, the company transports approximately 7 million tonnes of freight annually. XPO serves around 55,000 customers through 592 locations and employs approximately 37,000 people across North America and Europe. The company is headquartered in Greenwich, Connecticut, USA.

Across Europe, XPO employs approximately 15,000 people in 14 countries, including drivers, warehouse staff, and corporate employees. These countries include the Czech Republic, France, Germany, Ireland, Italy, Morocco, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain, and the United Kingdom.

Within the UK and Ireland, XPO operates through four principal legal entities, employing 5,871 permanent employees as of the end of 2025.



## **Operations and Supply Chains**

XPO provides comprehensive end-to-end supply chain solutions across the UK and Ireland. These services include freight brokerage, global forwarding, customs clearance, domestic transport, warehousing, last-mile delivery, and a range of 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**

XPO has established a European Risk Committee (ERC) responsible for identifying and assessing organisational risks and implementing effective control measures. The committee addresses a wide range of risk areas, including human rights, health and safety, environmental matters, and risks associated with modern slavery and human trafficking. Formal risk assessments are conducted twice annually.

## **UK Risk Committee**

XPO has also established a UK Risk Committee (UKRC) with effect from January 2025 to identify and manage risks which are specific to the UK business. The UKRC meets four times per year at the end of each quarter.

## **Actions to Prevent Modern Slavery in Our Supply Chains**

XPO Logistics has implemented robust measures to ensure transparency and ethical conduct across its business activities, ensuring compliance with the MSA. Our approach focuses on three core areas: policy implementation, risk assessment, and due diligence.

Protecting our employees and all individuals engaged with our business remains a key priority.

In the UK, the following measures have been implemented to mitigate the risk of slavery and human trafficking:

### **Policy**

XPO Logistics is committed to respecting human rights and ensuring that all individuals are treated fairly and with dignity. These principles are embedded within the Code of Business Ethics (COBE), which sets out expectations for ethical conduct and is actively overseen by XPO's Ethics and Compliance function.

The COBE was most recently updated in 2025 and is supported by a suite of additional policies, including a global Human Trafficking Policy and a UK-specific Anti-Slavery and Human Trafficking



Policy. The UK policy applies to all employees, officers and directors, as well as third parties such as suppliers and contractors operating within the UK.

The COBE and related policies are communicated to employees on joining XPO, with ongoing training provided throughout employment. In addition, workplace harassment prevention training is delivered globally to raise awareness across the organisation.

All new managers in the UK are required to complete mandatory Anti-Slavery and Human Trafficking training as part of their induction. In 2025, XPO introduced enhanced Modern Slavery Awareness training for all managers and updated its new employee induction programme. This training is accessible to all UK employees via the "XPO University" learning management system. As in previous years, all employees were required to complete annual COBE training during 2025.

### **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, XPO has implemented stringent procurement and supplier approval processes. Only approved suppliers are engaged, following comprehensive due diligence and the execution of formal contractual agreements. These processes include checks designed to identify and prevent any link to forced labour, human trafficking, or other unlawful practices.

XPO works closely with its Managed Service Provider (MSP), Neuen, to conduct regular audits. These audits verify compliance with pay instructions, including basic and premium rates, and ensure all right-to-work documentation meets legal requirements.

All work undertaken within the UK and Ireland complies with statutory Health and Safety and Environmental Protection legislation, supported by internal company policies.

All new XPO employees are subject to comprehensive right-to-work verification using RightCheck, a Home Office-verified system. Payroll reviews are also undertaken to identify potential indicators of exploitation, such as shared bank accounts or inconsistencies in account holder information.

XPO have recently enhanced our process regarding the assignment of temporary colleagues. In addition to standard List 1 and List 2 proof of identity requirements routinely held by the agencies, they also hold a verified photograph of the individual taken at the point of registration. This photograph is shared with XPO Logistics on the first day of assignment to ensure that the person assigned and the person arriving are one and the same. If any concerns arise, these are handled sensitively with line managers to assess and address any potential risks to the individual.

At XPO Logistics, 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.

### **Due Diligence**

Supplier engagement at XPO is centrally managed by a dedicated procurement function, ensuring consistency and control in the use of agency labour. Our European Code of Conduct (CoC), clearly defines expectations for suppliers and business partners. The CoC was shared with more than 200 long-standing strategic suppliers, all of whom responded positively.

The appointment process for transport subcontractors has also been standardised, improving visibility and oversight of third-party relationships.

### **Future Steps to Prevent Modern Slavery in Our Supply Chains**

XPO Logistics remains committed to continuously identifying, monitoring, and mitigating modern slavery risks throughout its operations and supply chains. Planned actions include:

- **Policy and Standards Review**  
Regular review and enhancement of the Third-Party Due Diligence Policy and Supplier Code of Conduct, alongside ongoing site audits to confirm that recruitment is conducted solely through approved agencies and subcontractors.
- **Training and Awareness**  
Continued delivery of mandatory modern slavery and human trafficking training through "XPO University" to maintain awareness across the workforce.
- **Induction Improvements**  
Ongoing updates to new-starter induction materials to include comprehensive guidance on recognising and preventing human trafficking and modern slavery.

Any concerns relating to modern slavery or human trafficking can be reported to [ComplianceOffice@xpo.com](mailto:ComplianceOffice@xpo.com) or via [www.xpo.ethicspoint.com](http://www.xpo.ethicspoint.com)

This statement has been approved by the Boards of XPO Transport Solutions UK Limited, XPO Global Forwarding UK Limited, XPO Maintenance UK Limited, and XPO Bulk UK Limited.



Signed:

Signed by:  
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