



## XPO Logistics – Slavery and Human Trafficking Statement for the year ending 31<sup>st</sup> December 2023

### **Our Commitment:**

This statement is made by XPO Transport Solutions UK Limited, XPO Maintenance UK Limited, XPO Global Forwarding UK Limited and XPO Bulk UK Limited (together referred to as “XPO”) operating in the UK as part of the XPO group of companies pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes XPO’s slavery and human trafficking statement for the financial year 1 January to 31 December 2023.

Our culture is about achieving results through teamwork, which requires us to always perform to the highest standards of business conduct. As a global leader in our industry, we endeavour to set an example which is beyond reproach.

We are committed to the following:

- Acting with integrity in all our business dealings
- Treating each other with dignity and respect
- Complying with all applicable policies, laws, and regulations
- Upholding the standards of behaviour set out in the XPO Logistics Code of Business Ethics (“COBE”).

XPO is committed to conducting business in a manner that respects human rights and the dignity of all people. We acknowledge our responsibilities in accordance with the Modern Slavery Act 2015 (the “MSA”), and we do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

### **Business Structure:**

XPO (NYSE: XPO) is one of the largest providers of asset-based less-than-truckload (LTL) transportation in North America, with proprietary technology that moves goods efficiently through its network. Together with its business in Europe, XPO serves approximately 52,000 customers with 596 locations and 38,000 employees. The company is headquartered 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 4900 permanent employees at the end of 2023.

### **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 established to collate company risk and identify control or elimination measures in the areas of human rights, health and safety and environment, including modern slavery and human trafficking risks twice per year.



### Steps taken to proactively prevent modern slavery in our supply chains:

We have taken steps to ensure that XPO is open and transparent in the way we operate our business and that our transactions and relationships are firmly compliant with our responsibilities under the MSA. Specifically, we focus our MSA compliance activities on three main areas: policy, risk assessment and due diligence.

Our priorities have continued to centre around safeguarding our employees and those who interact with our business.

We have taken the following steps in our UK business to combat slavery and trafficking:

#### **Policy**

XPO respects human rights and treats everyone who has contact with our business with dignity. These principles are set out in the COBE, which sets forth the standards of ethical behaviour at the company and are supported and promoted by XPO's Ethics and Compliance department.

The COBE, which was updated in 2023, is supplemented by a set of additional policies, which includes both a global Human Trafficking policy and a UK Anti-Slavery and Human Trafficking policy. The UK-specific policy is applicable to all XPO employees, officers and directors and other parties acting on XPO's behalf, such as its suppliers and partners, in respect of our business in the UK.

The COBE and policies are communicated to all employees when they join XPO. During their employment, we provide employees with ongoing training on the COBE and its associated policies. We also deliver specific preventing workplace harassment training to increase awareness across our global operations.

In the UK, we provide an Anti-Slavery and Human Trafficking online training module to all new managers as part of their induction. In 2023 we designed new Modern Slavery Awareness training for all managers and updated the new employee induction. In addition to the mandatory training for new managers, this online training is also available to all UK employees through our "XPO University" learning management platform. In 2023 every employee was also required to complete the annual COBE training.

#### **Risk Assessment**

Our ongoing assessment of risk identifies that recruitment of subcontract labour and agency workers poses the greatest risk of potential exposure to human trafficking and modern slavery. This also extends to the use of business partners and subcontractors.

The risks are negated by robust procurement practices, working only with approved suppliers that are subject to checks, scrutiny and documented contractual agreements. The checks include verification of supplier arrangements to ensure against human trafficking and modern slavery.

We work closely with our Managed Service Provider (MSP) Neuvan, to carry out periodic audits aimed at ensuring that basic and premium pay rates are applied as instructed and that ongoing right to work documentation is in place and meets legal requirements.

All work carried out in UK, and Ireland is subject to established statutory instruments in relation to Health and Safety and Environmental Protection for which specific policies exist.



In 2023 we introduced a digital Right to Work application that enhances the robustness of our right-to-work checks and compliance.

### **Due Diligence**

All supplier appointments are managed by a centralised procurement team which provides a consistent approach and control over our appointment of agency labour. In 2023, we have updated our supplier process and added the European Code of Conduct, which further ensures that our expectations are clear and unambiguous.

The appointment of transportation subcontractors has also been standardised, providing better knowledge and oversight of the third parties we work with.

XPO undertakes to ensure that all temporary workers are offered a free choice of payroll method and that a declaration to this effect is retained as part of their personnel file. XPO has the right to audit all agencies engaged, and the declaration is part of the protocol. This ensures that workers supplied to us on a temporary or subcontract basis are treated and paid lawfully.

We also undertaken a regular exercise to ensure compliance with Agency Worker Regulations in relation to parity of pay and conditions for temporary workers engaged on assignment for 12 weeks or longer. By comparing XPO full-time employee terms and conditions to those offered to agency colleagues, we can be assured that we are treating all parties fairly.

Through our use of a Managed Service Provider (MSP), we will further consolidate the preferred supplier list, thus ensuring only market-leading agencies with national coverage are engaged. This serves to shorten communication lines and make the process of monitoring full compliance quicker and more efficient. In 2023 we reduced the MSP list of agencies by 35%.

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

We will continue to monitor the modern slavery risk by way of policy, risk assessment, training, and due diligence. Specifically;

- We will continually review and revise our Third-Party Due Diligence Policy and Supplier Code of Conduct to ensure that they remain robust and current. In addition, we will continue to audit our sites to ensure they recruit only from an approved list of agencies and sub-contractors.
- We will continue to use our internal "XPO University" learning management platform to deliver modern slavery and human trafficking training and increase awareness to all employees on a regular and mandatory basis.
- We will continuously review and update our new employee Induction presentations and materials to include guidance around human trafficking for all employees.

Any concerns regarding human trafficking or modern slavery within our business should be reported to [ComplianceOffice@xpo.com](mailto:ComplianceOffice@xpo.com) or [www.xpo.ethicspoint.com](http://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.

# XPO Logistics

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