DHL GBS (UK) LIMITED 2023

MODERN SLAVERY STATEMENT

GLOBAL BUSINESS SERVICES



Introduction from the Board

Here at DHL GBS (UK) Limited, we recognise that the current environment in which we operate, continues to face labour shortages which combined with a changing world of work, means modern slavery remains a significant risk area for all businesses. As a global organisation, we have a responsibility to ensure we play our part in upholding the highest ethical standards within our own operations and expect the same from the suppliers that we work with.

The UK Modern Slavery Act 2015, a global leading piece of legislation, outlines a host of measures to combat modern slavery and human trafficking. It requires businesses to hold themselves accountable through disclosure of steps that have been taken during the financial year to ensure such practices are absent from their operations and supply chains.

Part of the world's largest leading logistics company, DHL Group, as an employer of choice, leads by example. Our Group Human Rights Policy Statement anchors minimum standards for fair working conditions and human rights in employee relations. The enforcement of this policy is supervised by myself and the DHL GBS (UK) Limited's Board, ensuring that the business understands its responsibility to uphold human rights and integrates this into our service provision and day-to-day behaviours.

Throughout 2023, our business has remained focused on ensuring the protection of human rights within both our own operations and with our suppliers:

- Ensured all management completed our Compulsory Code of Conduct training.
- Introduced new internal controls on Human Rights.
- Internal Human Rights Risk Assessment completed for all legal entities.
- Educated our business on the implications of the German Supply Chain Act (LkSG) and its relevance for our operations in the UK.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes DHL GBS (UK) Limited's Modern Slavery Statement for the financial year ending 31st December 2023.

DHL GBS UK BOARD MEMBERS
February 2025



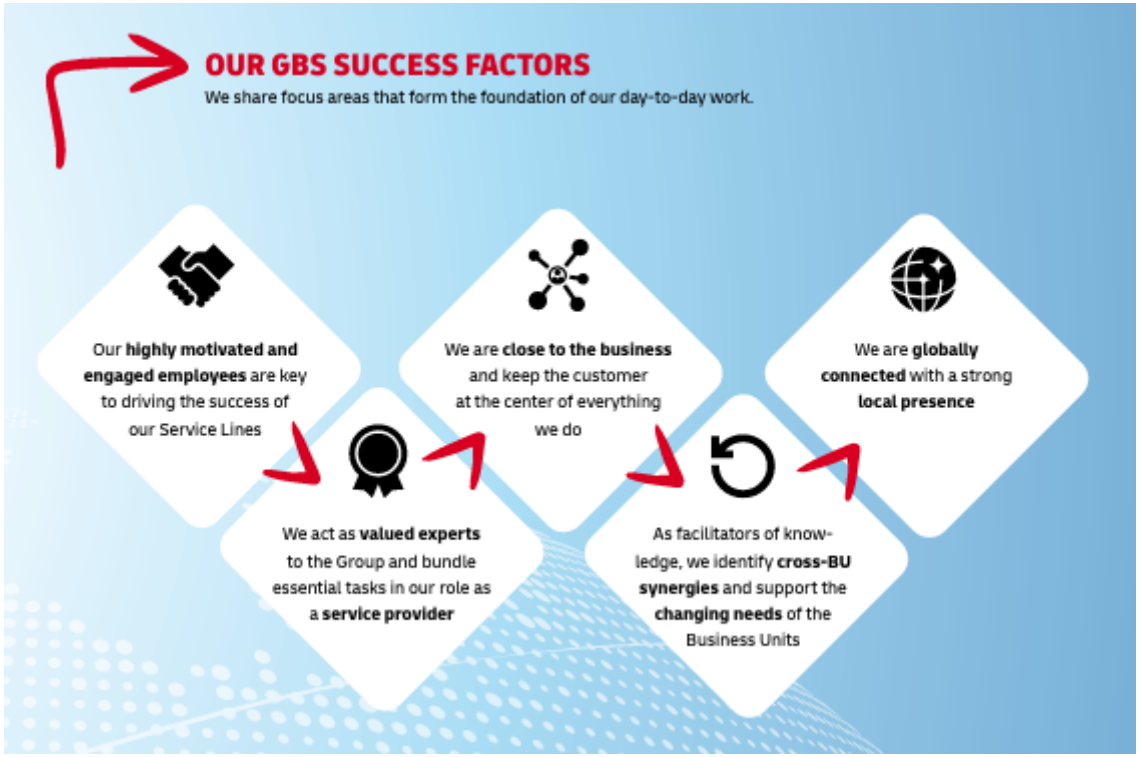
About DHL and our Supply Chains

DHL Group is the world's leading logistics company with approximately 594,000 employees operating in over 220 countries and territories. The Group connects people and markets and is an enabler of global trade. It aspires to be the first choice for customers, employees and investors worldwide. DHL contributes to the world through its commitments to clean operations for climate protection, a great company to work for all and a highly trusted company.

DHL GBS (UK) Limited provides a range of professional services in the disciplines of Legal, Pension, Risk and Insurance, Tax, Real Estate and Procurement to DHL Group entities based in the UK, with 280 employees.

As part of the DHL Group, DHL GBS (UK) Limited 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.





Our Due Diligence

As a German headquartered company with thousands of global employees and with business models which rely on the services of various suppliers and subcontractors, DHL Group is responsible for adhering to the minimum standards of the German Supply Chain Due Diligence Act.

To comply with international Human Rights standards, national laws and DHL GBS UK Limted's policies we undertake appropriate Human Rights due diligence to identify, assess and address potential and actual adverse human rights impacts in our business activities and supply chain.

Our Human Rights Policy Statement, focuses on human rights relevant for our business and operations. Our due diligence framework, ensures that our Human Rights Policy Statement is implemented among our workforce. In addition, we use the system to monitor due diligence compliance. The Human Rights Due Diligence Framework that is also applicable for modern slavery risks covers the following five key areas:

1. Policy management
2. Awareness
3. Risk assessment & mitigation
4. Tracking & reporting
5. Grievance mechanisms & remedies



1. Policy Management

The following policies are in place in relation to slavery and human trafficking:

Human Rights Policy Statement

The importance DHL Group places on human rights topics is displayed by the Human Rights Policy Statement issued by the Corporate Board which is based on the UN Global Compact, the Universal Declaration of Human Rights, the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the UN Sustainable Development Goals.

The Human Rights Policy statement anchors minimum standards for fair working conditions and human rights in employee relations.



Code of Conduct

Our Code of Conduct reflects the business corporate values "Respect & Results". The rules and standards outlined in the Code serve as an "ethical compass" that guides all employees worldwide in their day-to-day work. There is no alternative to conducting our business in a responsible, fair and ethically irreproachable way. DHL Group Board of Management endorses the values outlined in the Code of Conduct and expects all employees, executives and managers to be role models in their daily work and to contribute to a corporate culture characterized by respect. The Code of Conduct is binding for all regions and business units of the DHL Group.

Supplier Code of Conduct

The Supplier Code of Conduct, is a reflection of the ethical, social and environmental standards we set for ourselves, and it is a binding component of our relationships with our suppliers, including subcontractors. By accepting it, the supplier undertakes to comply with our standards and to implement them in its own supply chain. For more detailed information on the Supplier Code of Conduct, please click here.

2. Awareness

Raising awareness of modern slavery, both within our business and our supply chains is an important part of our due diligence framework.

Our People

- All new joiners are inducted into the core principles of the **DHL Code of Conduct**.
- **Human Rights e-learning:** All senior management are required to complete this training every two years to ensure ongoing awareness and understanding of ethical standards, human rights, labour rights, and the prevention of modern slavery and human trafficking.
- **Supplier Code of Conduct (SCoC) e-learning:** All senior management are required to complete this training every two years to understand the importance of the SCoC set of strict ethical standards for doing business with our suppliers.

98.5%

Employees trained on **Code of Conduct** in 2023

Our Supply Chain

- To certify their commitment, suppliers are asked to complete the interactive **Supplier Code of Conduct training** that is available in 11 languages and upload their certificate into the supplier management software suite.
- **Supplier Webcasts** are produced to raise greater awareness on topics such as Human Rights.
- In conjunction with **Trace International**, we provide Suppliers & their staff, free of charge training on important topics such as Forced Labor & Human Trafficking.
- We convey our expectations to our suppliers and subcontractors via our **Supplier Portal** and introduce our selection processes. Suppliers can also use our portal to familiarize themselves with our Supplier Code of Conduct, which we make available in numerous languages along with the corresponding training module. From there, they can also access our professional compliance whistleblower system that they can use to report potential violations of the Code or statutory provisions as well as cybersecurity incidents.



3. Risk Assessment & Mitigation

DHL believe there is a low level of risk in relation to Modern Slavery in DHL GBS (UK) Limited operations. DHL's own operations are assessed on an annual basis through internal programmes. Corporate Procurement establishes procurement standards, policies and procedures related to suppliers within the DHL Group.

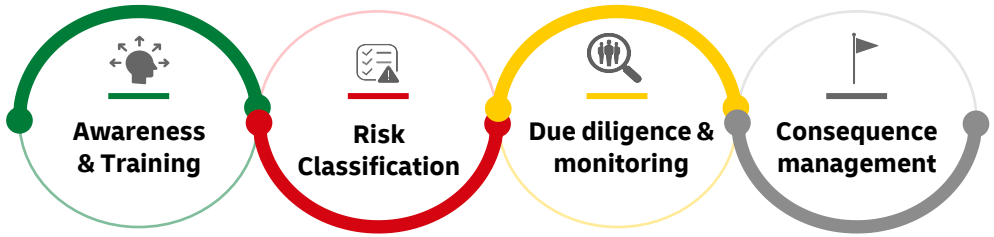
DHL have a number of programmes to ensure safe operations. These include:

- Annual Human Rights Country risk assessment
- Internal Control System
- Internal Audit and Review programmes

Supplier Due Diligence and Risk Assessment Process

DHL has implemented a Group-wide risk management system for supplier assessments. This calculates the potential risk of suppliers at the level of purchase categories (material groups). The risk assessment is influenced by 46 types of risk within eight risk domains (ESG, economic, technical, legal and political risks, as well as cybersecurity) that are evaluated for each individual purchasing category.

This selection process is based on a standardized assessment that also takes aspects such as diversity and respect for human rights into account, as well as external criteria such as those from Transparency International (Corruption Perceptions Index) and Verisk Maplecroft. In the year under review, the supplier assessment was supplemented with additional internal measures and expanded with external audits (including in accordance with the SMETA method). In the event of findings, remedial measures are discussed and plans for corrective measures are agreed upon.



DHL GBS (UK) Limited procures a wide range of goods and services including:

28%
Management & Professional Services

21%
Temporary Labour

9%
Real Estate

5%
Company Cars

Note: Other goods and services such as; Facilities Management, Utilities, Office Supplies, IT Hardware & Software, Transportation, Uniforms and Personal Protective equipment *and Telecommunications each represent less that 5% per category.*

3. Risk Assessment & Mitigation

Identified Key Risk Areas

DHL Group, for the year under review, has assessed five supplier categories defined as higher risk for the areas covered by our Human Rights Policy Statement:

- Road transport
- Uniforms and personal protective equipment
- Temporary Labour & Output Based Services
- Promotional items
- Building renovations and new constructions

DHL Group uses a Supplier Risk Management Tool. This tool serves as the single point of access for all risk management activities for suppliers. Assessment scores stored in this tool include but are not limited to a Due Diligence Questionnaire (DDQ) or external supplier evaluation such as EcoVadis.

The Supplier Risk Management Tool presents all available risk assessments of a supplier according to a consistent logic. Suppliers who score between 0 and 25 will be classified as high-risk suppliers and a Corrective Action Plan (CAP) will need to be formulated and agreed between all stakeholders.

The expectation is that the supplier will complete this in an agreed timeframe and then undertake a new Assessment. Should the supplier not engage or complete the CAP to a satisfactory level, the supplier may be off-boarded. For those Suppliers who score between 26 to 49, they will be classified as medium-risk supplier and will need to implement their own CAP and be reassessed in 12 months. Suppliers who score 50 or above will be classified as low-risk suppliers and will have to be reassessed in 36 months.

SUPPLIER SCORE	ACTION
50 - 100	Assess every 3 years
26 - 49	Annual Assessment & Priority Action in Improvement Plan
0 - 25	Reassessment/Corrective Action Plan
	Consider phase out if failure.



4. Tracking and Reporting

Corporate Governance and Monitoring

We communicate and report on our human rights-related commitments, activities and statements, as part of DHL Group's annual reporting. DHL GBS (UK) Limited regularly evaluates and reviews how best to improve and strengthen our approach to addressing human rights in our sphere of influence.

Supplier Assessments

As part of DHL GBS (UK) Limited's efforts to appropriately document risk-based due diligence pertaining to the hiring and appropriate regular oversight of suppliers, we have conducted Supplier Due Diligence assessments across the potential high-risk supplier categories as described under "Risk Assessment and Mitigation" section of this report. Under these assessments, no high-risk suppliers were identified.

Effectiveness of the Compliance Incident Reporting System

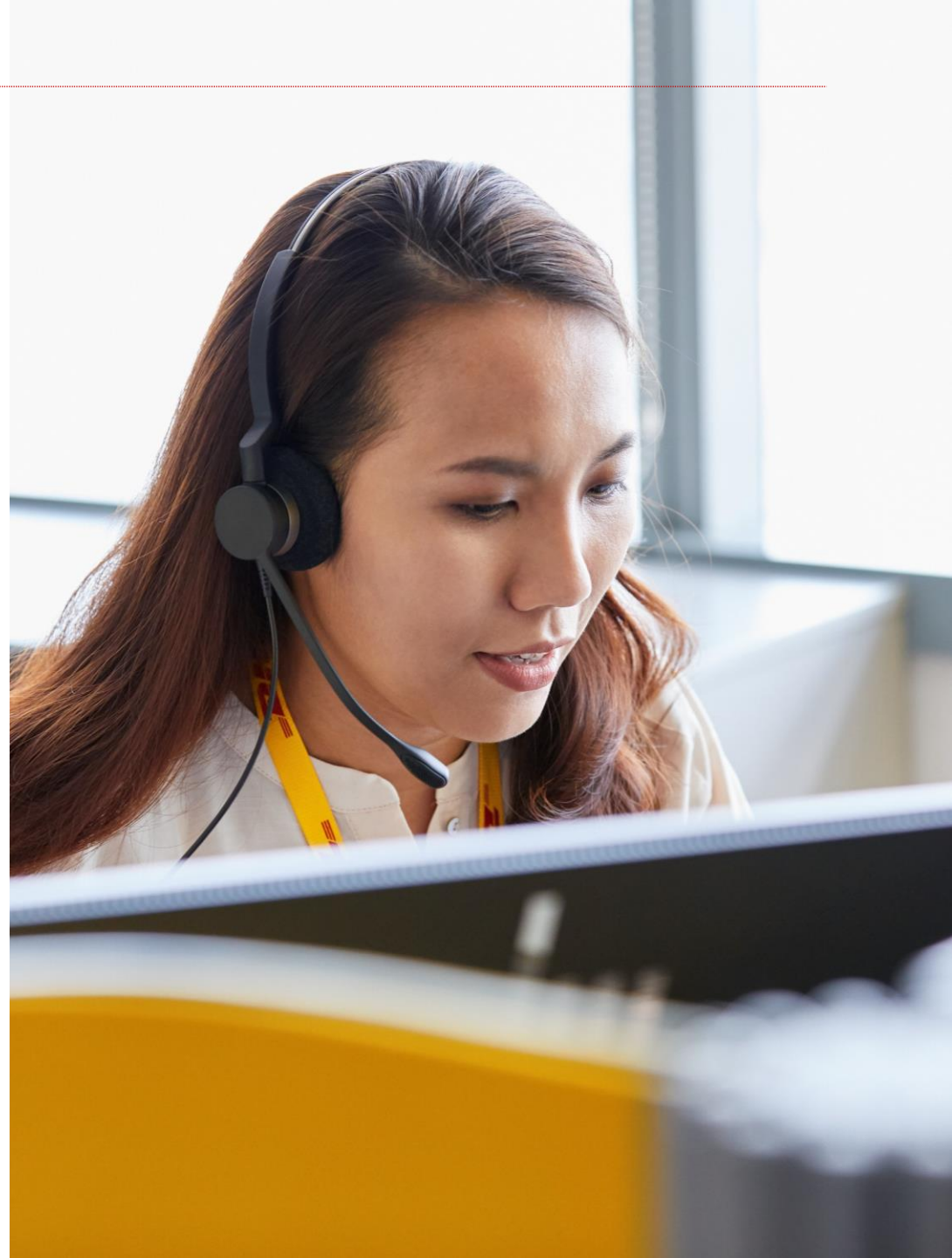
Identification and management of non-compliance are essential in implementing certain corporate governance principles and standards, specifically provisions on the fight against human rights violations, corruption, and criminal law. In this reporting year, there have been no compliance issues raised in relation to modern slavery through these processes either regarding our own operations or the supplier base in DHL GBS (UK) Limited

Internal Awareness and Training Programs

Comprehensive awareness and training at all levels and all locations are the most effective means to mitigate risks and protect DHL GBS (UK) Limited and its employees. In 2023, 100% of all senior management completed Human Rights training with 276 employees trained on the DHL Code of Conduct.

Reporting

It is each employee's personal responsibility to report any actual or suspected violations of our Human Rights Policy. Violations include not only non-compliance, but also a failure by the responsible management to detect and/or report offences. Reporting channels include the employee's line manager, local management, the human resource department, the compliance department, Legal Department or the 'Speak Up' compliance incident management system.

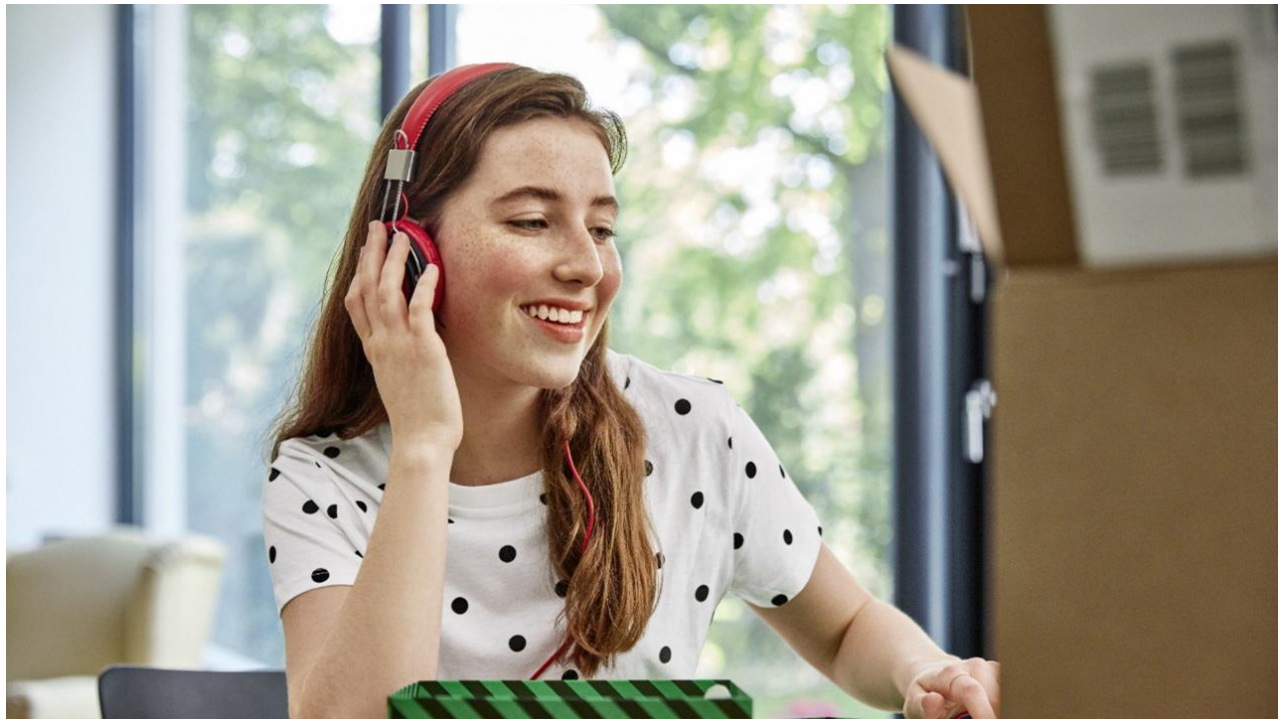


5. Grievance mechanisms and remedies

Compliance Incident Reporting System

The group operates a professional Compliance Incident Reporting System where employees and third parties can share concerns/issues , including matters relating to labour practices or breaches of human rights. All reported violations are handled confidentially. Any matter raised is investigated by an independent investigation team.

If it is determined that there is a risk of adverse human rights impact caused or contributed to by our business activities, we have a procedure in place to ensure the activity is assessed, changed, discontinued and/or remediated. We encourage our employees to address suspected violations of this modern slavery policy statement through the established accessible grievance or dispute resolution channels including local management, responsible Human Resources departments or the Compliance Incident Reporting System. Our partners and third parties can also access the reporting portal via Home - BKMS System (bkms-system.com) to report potential violations of our Human Rights Policy Statement. The system also offers various local telephony lines. The system can be used anonymously as well.



Consequences of a breach

If infringements against our policies are reported, we will take appropriate measures for proper clarification of the circumstances of the breach. We will take corrective actions where appropriate. Consequences under civil and criminal law will depend on how and in what circumstances an individual has contravened our policies. Where a breach of legislation is proven in this regard, we also reserve the right to refer the matter to the relevant authorities for further action. An allegation or violation of our Supplier Code of Conduct and/ or standards, may prompt an investigation or inquiry. Should sufficient evidence come to light, we will take appropriate action as the circumstances may require. Any consequences applied will depend on the severity and in line with our internal Supplier Incident Management Process.

Next Steps

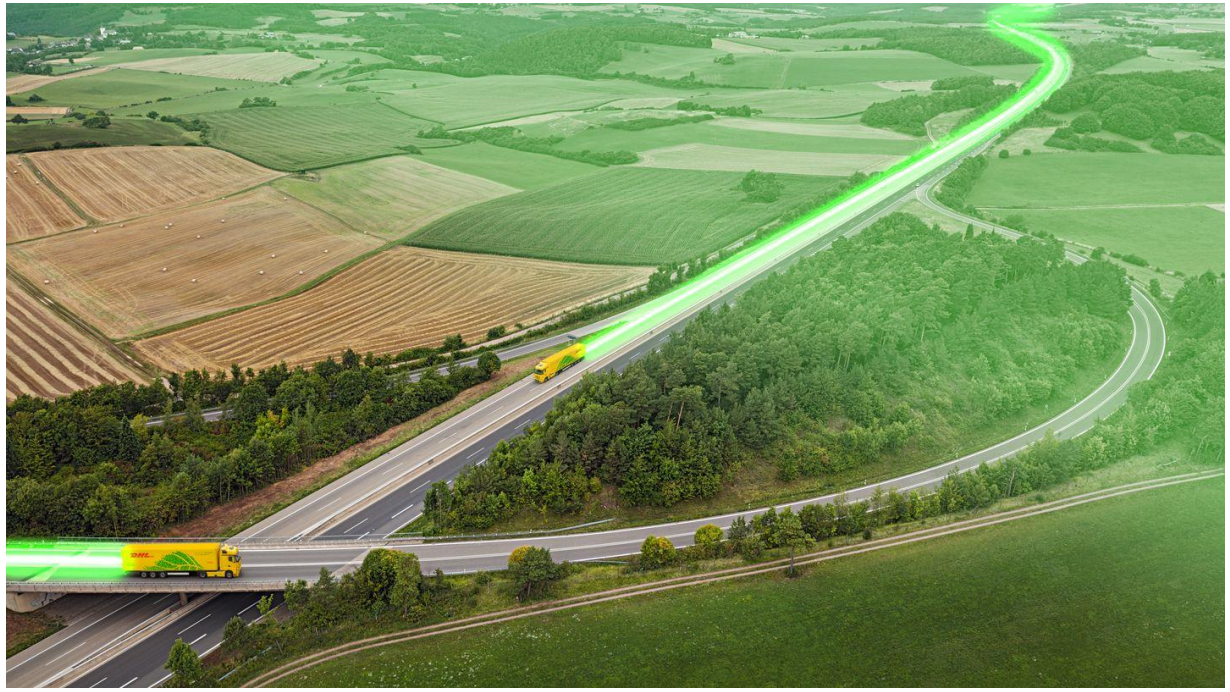
DHL GBS (UK) Limited will continue to monitor the modern slavery risk through continued risk assessment and due diligence, both in its own operations and suppliers. It will continue to monitor its supplier's compliance with obligations committed to in the Supplier Code of Conduct through a risk-based schedule of assessments.

Our focus throughout 2024 and beyond will be to increase our understanding of the risks of modern slavery and raise awareness regarding Human Rights in our supply chain and own operations.

We will continue training new and existing staff members on the importance of the DHL Code of Conduct, expanding Human Rights training to all Human Resources colleagues.

DHL GBS (UK) Limited 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.

DHL Group is also actively seeking to engage with other organisations to identify opportunities to further address the challenge of modern slavery in the workplace.



DHL GBS (UK) Limited regularly evaluates and reviews how best to improve and strengthen our approach to addressing human rights in our sphere of influence.

Approval and Signature

The Directors of DHL GBS (UK) Limited reviewed and approved the Statement in their capacity as principal governing body.



Director: Blair Parker

DHL GBS (UK) Limited



Director: Bridget Baxter

DHL GBS (UK) Limited



Director: John Baird

DHL GBS (UK) Limited



Director: Tejinder Pawar

DHL GBS (UK) Limited



Director: Daniel Cavaciuti

DHL GBS (UK) Limited



Director: Helen Robertson

DHL GBS (UK) Limited



Director: Michael Trimm

DHL GBS (UK) Limited



Director: Nicola Harrington

DHL GBS (UK) Limited

Date: 20 February 2025