

# DHL GBS (UK) LIMITED 2024 MODERN SLAVERY STATEMENT



GLOBAL BUSINESS SERVICES



# Introduction from the Board

**At DHL GBS (UK) Limited, we recognise that the ongoing labour shortages, coupled with the evolving nature of work, pose a significant risk of modern slavery for all businesses. As a global organisation, we are committed to maintaining the highest ethical standards in our operations and expect our suppliers to do the same.**

The UK Modern Slavery Act 2015, now in its 10<sup>th</sup> year, 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 DHL GBS (UK) Limited's Board, ensuring that the business understands its responsibility to uphold human rights, and we continue to integrate this into our operations and day-to-day behaviours.

Throughout 2024, our business has remained focused on ensuring the protection of human rights within both our own operations and our supply chain:

- Completion of mandatory Code of Conduct training for relevant employees.
- Internal Human Rights Risk Assessment completed for all legal entities.
- New role introduced to focus solely on Human Rights risk and compliance.
- Enhanced Temporary Labour supplier due diligence.

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 2024.

## DHL GBS UK Board Members

13 June 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, investors, and green logistics worldwide. DHL contributes to the world through sustainable business practices, corporate citizenship, and environmental activities. We want to lead the way towards sustainable logistics – we want to be the Green Logistics of Choice, provide a great place to work for all, and be a highly trusted company and partner. As Investment of Choice, we plan to accelerate our growth – in a profitable and sustainable way.**

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.

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) Limited'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](#).

We consider as an accepted SCoC the following:

- Our own Supplier Code of Conduct
- If the supplier has implemented a code of conduct that we classify as equivalent
- If both contracting parties are supplier and customer at the same time, they can mutually recognize each other's own company code of conduct, provided they have been classified as equivalent.

In DHL Group we measure our ability to enforce compliance with our standards in the upstream value chain with the metric "Supplier spend covered by an accepted SCoC". In reporting year 2024 this metric increased to more than EUR 39 billion (2023: > 35 EUR billion). This corresponds to a share of >90% of eligible procurement expenditure.

### Whistleblower Policy

This policy outlines the mechanism in place which allows anyone to raise concerns around modern slavery, forced labour and human trafficking and includes how individuals raising a concern will be protected from retaliatory behaviour for blowing the whistle under UK regulations.

**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**.
- **Building Great Employee Relations training:** We train managers, supervisors and HR professionals on the importance of creating and delivering people practices which develop and maintain a positive climate of employee relations, with people practices that are fair, legally compliant and fit for purpose.
- **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.
- **The role of HR in Human Rights Due Diligence** – operational HR teams are trained in recognising Human Rights risk, including prevention of forced and child labour
- **Supplier Code of Conduct (SCoC) e-learning:** All senior management and procurement employees 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.



**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's 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 Operations

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

The minimum requirements for risk assessment are based on risk potential, which we re-evaluate annually depending on the procurement category and the geographical location of the supplier.

The risk assessment is influenced by the procurement category and various other types of risk within the relevant risk domains ESG, the economy, technology, law and politics, and cybersecurity.

Other factors such as diversity and respect for human rights, in addition to external criteria for determining risk potential such as the Corruption Perception Index issued by Transparency International and/or Verisk Maplecroft's risk classification system are also considered. The final assessment of risk potential is based on an evaluation of the probability of occurrence and possible impact.

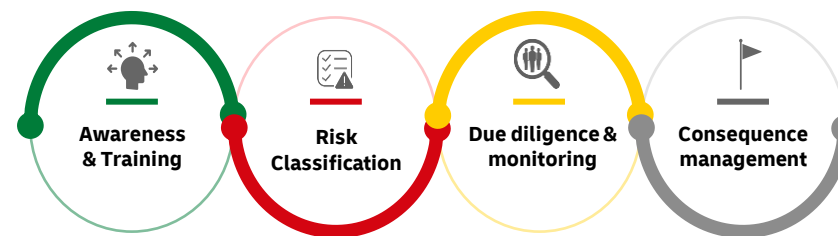
The final assessment of risk potential is based on an evaluation of the probability of occurrence and possible impact. The Group-wide risk management system for supplier evaluations (Shield) is continuously reviewed for potential improvements and adjusted as necessary. Our assessment procedure is flexible and adaptive and therefore takes account of the different requirements of our business models.

The following evaluation tools can be used individually or in combination with each other, depending on the requirements of the specific tendering process, or they may be used to review existing contractual relationships.

#### Supplier Management Evaluation Tools

- Self-assessment questionnaires
- Virtual or onsite audits
- Certification issued by a third party
- Risk rating issued by a third party
- Checking suppliers against sanctions lists

If supplier practices are identified that are not in line with our standards, this could result in the supplier being excluded from tenders. Should a serious breach or material shortcoming be identified among existing suppliers, we jointly agree on specific actions for improvement with the supplier and follow up on their implementation. We reserve the right to terminate the supplier relationship if we do not identify sufficient improvements when re-assessing the supplier.



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



**22%**

**Management & Professional Services**



**17%**

**Temporary Labour**



**11%**

**Human Resource Services**



**8%**

**Real Estate**



**5%**

**Information Technology Services**



### 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 EcoVardis.

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.

### Audits & Assessments Completed

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, 13 Supplier Due Diligence assessments were conducted in 2024 across the potential high-risk supplier human rights categories.

### 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.

### 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 \(bkms-system.com\)](https://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 persist in monitoring the risk of modern slavery through ongoing risk assessments and due diligence, both in its operations and among its suppliers. The company will maintain oversight of supplier compliance with the commitments outlined in the Supplier Code of Conduct through a risk-based assessment schedule.

Our commitment for 2025 and beyond is to deepen our understanding of modern slavery risks and enhance awareness of Human Rights within our supply chain and operations. We will continue to provide training for both new and existing employees on the significance of the DHL Code of Conduct, with a focus on expanding Human Rights training for all Human Resources colleagues.

DHL GBS (UK) Limited aims to raise general awareness of modern slavery in the UK and globally by consistently training its management teams and encouraging employees to report any concerns or potential signs of modern slavery in its various forms.

Furthermore, DHL Group is actively seeking to collaborate with other organisations to identify opportunities to effectively 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: John Baird  
**DHL GBS (UK) Limited**



Director: Bridget Baxter  
**DHL GBS (UK) Limited**



Director: Daniel Cavacutti  
**DHL GBS (UK) Limited**



Director: Nicola Harrington  
**DHL GBS (UK) Limited**



Director: Blair Parker  
**DHL GBS (UK) Limited**



Director: Helen Robertson  
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Director: Robin Timson  
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Director: Michael Trimm  
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