

KUEHNE + NAGEL LIMITED**Anti-Slavery and Human Trafficking Statement 2025****Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of Kuehne + Nagel Limited operating under the consolidated group of Kuehne + Nagel International AG as the parent company.

This statement provides an overview of Kuehne + Nagel Limited's policies and due diligence processes relating to the risk of modern slavery in the UK and should be regarded as complementary to the Kuehne + Nagel International AG ¹ which we use to report against our commitments under UN Global Compact (UNGC) 10 principles.

It also provides an overview of the work Kuehne + Nagel Limited has done in the financial year ending 31 December 2025 to minimise the risk of labour exploitation and human trafficking occurring in its business or supply chains. This modern slavery statement has been approved by the UK Board of Kuehne + Nagel Limited.

Our business

Kuehne + Nagel International AG provides logistics services to around 400,000 customers worldwide. The holding company Kuehne + Nagel International AG is recognised as the global number one in air and sea logistics and has strong market positions in road and contract logistics, with approximately 85,000 employees in 100 countries. Kuehne + Nagel International AG is registered in Schindellegi, Switzerland and is listed on the SIX Swiss Exchange.

Kuehne + Nagel Limited is a limited company offering logistics services and integrated logistics solutions across five key business units: Air Logistics, Road Logistics, Sea Logistics, Contract Logistics and Integrated Logistics. We have over 3,600 employees across the UK, with an annual UK turnover of £1.1 billion and a registered head office in Feltham, UK.

Our operations are illustrated below:

<https://assets.kuehne-nagel.com/f/331466/x/a7fc2ff421/company-sustainability-esg-sustainability-report-2025.pdf>



Our value chain

The majority of revenue earned by our business is through specialised service provision carried out by employees of Kuehne + Nagel Ltd. In providing these services, we maintain ongoing relationships with circa 1,650 suppliers.

We are committed to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to prevent modern slavery and human trafficking. As such, we recognise our responsibility to manage our businesses and supply chains to identify and alleviate any potential or actual human rights violations. The Kuehne+Nagel Code of Conduct, alongside our Supplier Code of Conduct, global- and UK-level Human Rights Policies², and our formal support for the UN Global Compact³, all demonstrate our commitment to human rights and fair working conditions.

Across our business and supply chain, we promote a culture that fully supports and respects human rights, and our global 'KN Ethics & Compliance Programme' is designed to ensure

²<https://www.kuehne-nagel.com/company/ethics-and-compliance>

³ <https://unglobalcompact.org/what-is-gc/participants/138254-Kuehne-Nagel-Management-AG>

that we comply with all legal and regulatory requirements as well as with our internal regulations and other rules of professional and ethical conduct.

Identifying modern slavery risks

We operate a structured internal governance framework designed to continuously monitor, assess and control risks associated with modern slavery and human trafficking across our operations and supply chain. This framework embeds clear accountability, regular review cycles and defined controls to ensure risks are systematically identified, managed and mitigated.

Modern slavery risks within our business

We believe our highest area of potential risk within our direct operations is in the use of agency labour. To mitigate our supply chain risk and as part of their contractual relationship with us, we require all suppliers in the UK to confirm that they will comply with our Supplier Code of Conduct and always pass on our approved contractor requirements.

While we consider the risk of modern slavery occurring in our direct operations to be relatively low when compared to certain other areas of our supply chain, we recognise that risks remain and continue to actively monitor and mitigate them. There can also be a risk of modern slavery occurring in areas of our operation where we have less visibility over second-tier suppliers, or where suppliers are dependent on agency labour. To address this risk, Kuehne+Nagel makes it a formal requirement for all suppliers to gain authorisation to use and declare the use of any subcontractors employed in the delivery of services to us.

Modern slavery risks within our supply chain

Our human rights assessment and risk mapping programs highlight modern slavery risks associated with the supply chain for the logistics sector. For example, the use of migrant workers and contracted labour, a potential lack of traceability on working hours and wages further down the supply chain, as well as the potential presence of gangmasters in warehousing and facilities management. The risk assessments also suggested that, across all sectors, the greatest risk lies with smaller companies which in some cases lack formal policies and processes on ethical trade, labour and human rights, or lack management systems and monitoring programmes to effectively deal with modern slavery.

To mitigate these potential risks, we mandate the highest employment standards in all our operations and require our suppliers to sign up to and comply with the Kuehne+Nagel Supplier Code of Conduct. As part of our ongoing due diligence, all our suppliers are robustly checked during the onboarding process and before being commissioned for any work. Our suppliers must commit to upholding human rights of workers, and our confidential reporting line is open to everyone.

As part of our Supplier Code of Conduct, suppliers agree not to use forced, indentured, involuntary, or child labour and agree to uphold internationally proclaimed human rights of workers. We take compliance with our Supplier Code of Conduct seriously and any suspected breach will lead us to carry out an investigation and to take remedial steps as required.

Managing Modern Slavery Risks

To combat the key risk areas identified above we have in place a preferred vendor programme with our suppliers of agency and seasonal workers and a supplier management solution for direct suppliers of haulage and transportation services. These programmes include a rigorous and significant due diligence procedure, designed to support our commitment to work only with reputable organisations who share our commitment to tackling modern slavery and human trafficking risk.

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Our policies in relation to modern slavery

Kuehne + Nagel Limited is committed to acting in accordance with our legal, regulatory, and other compliance requirements. Our company and employees operate under several policies designed to ensure a high standard of social governance and ethical compliance, including our comprehensive Supplier Code of Conduct and our UK Modern Slavery and Human Rights policy which was published in 2025. All policies are available internally on our intranet and key policies are placed on our website.

Supplier Code of Conduct

Our Supplier Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. It is a fundamental commitment to comply with all applicable legal requirements and with high ethical standards. The code outlines responsibilities to colleagues, customers and to Kuehne + Nagel Ltd. The Supplier Code of Conduct highlights these commitments and sets out how we will work with our suppliers to address potential areas of risk. If a problem is identified, we will work together with the supplier to address any areas of concern. Where we are unable to satisfactorily resolve the issue, we may terminate our use of them as a supplier or contractor.

Policies

In addition to the Supplier Code of Conduct, Kuehne+Nagel maintains policies on customers and suppliers, human rights, and the rights of employees. Specific policies applicable to modern slavery include:

- Code of Conduct
- Global Human Rights policy
- UK Modern slavery and Human Rights Policy
- Recruitment and selection policy

- Whistleblowing policy and procedure
- Bullying and harassment policy
- Safeguarding policy
- Domestic abuse policy
- Grievance Policy
- Equality and Diversity Policy
- Social Value Policy

All of these are available on our intranet **for our employees**. **Externally our approach to Human Rights can be viewed at** <https://www.kuehne-nagel.com/company/ethics-and-compliance>

Due diligence

Kuehne+Nagel is committed to respecting human rights in line with the UN Guiding Principles. We apply a risk-based approach to due diligence, focusing enhanced scrutiny on higher-risk categories, including labour-intensive services and use of subcontracting. Our human rights due diligence activities continuously strengthen key processes that enable us to identify and act upon actual and potential human rights risks in our operations and through our business partnerships.

We assess compliance with our Supplier Code of Conduct with suppliers in high-risk categories by conducting due diligence activities such as risk assessments and documentation reviews.

Training

We maintain an active and continuously evolving training programme to ensure employees understand and can effectively identify and manage risks related to modern slavery and human trafficking across our business and supply chain.

Core training is regularly refreshed to reflect current risks, regulatory expectations and best practice, supported by an updated learning module deployed in 2025. In parallel, targeted, role-specific training is delivered to key stakeholders and leaders to strengthen accountability and embed modern slavery awareness within day-to-day decision-making and operational oversight.

Collaboration and stakeholder engagement

On human rights issues, ongoing engagement with civil society and wider stakeholders is important for informing our approach. We engage with stakeholders and their representatives including unions and experts in labour and human rights, such as the Wilberforce Institute.

Kuehne+Nagel has a unionised workforce within the fulfilment and delivery areas of our business, and we consult with employee representative bodies, including trade unions and works councils.

Whistleblowing System

Kuehne + Nagel Limited has a Whistleblowing Policy for all its employees and those working on Kuehne+Nagel sites, including contractors, consultants or person acting in the name of the company.

This is supported with a confidential hotline to assist employees and suppliers when ‘speaking up’ on a confidential basis. The hotline number is included in our Code of Conduct and is run by an independent third-party service provider NAVEX. The policy is designed to allow both employees and suppliers to raise concerns and to disclose information which the individual believes highlights or would indicate illegality, unethical behaviour or other serious malpractice, including any instances or suspicions of modern slavery. All reports are treated confidentially and investigated in line with our established procedures. We are committed to ensuring that individuals can raise concerns without fear of retaliation.

There were no reports made relating to modern slavery or human rights in 2025.

Continued measurement of our effectiveness

To supplement our previous assessments and findings, in 2026 we will conduct risk assessments at several additional Kuehne+Nagel sites, including relevant suppliers who operate at those sites, to help us validate that our policies and procedures are working well throughout our business. The key aims of these assessments are to map out management practices and identify key areas of intervention. We will use these findings to strengthen our due diligence processes and monitor our performance.

Key Performance Indicators (KPIs)

We have worked with external modern slavery experts to review our existing systems, benchmark our level of compliance, and advise on enhanced systems, due diligence, and management KPIs. As a result of internal discussions involving our internal Anti-Slavery and Human Rights steering group we have developed and implemented appropriate KPIs to measure our effectiveness. Appropriate targets for these KPI’s are reviewed and agreed annually.

Continuous improvement

Kuehne + Nagel Ltd takes Modern Slavery Act compliance seriously and is committed to continuous improvement. Supported by our internal Anti-Slavery and Human Rights steering group, we review our anti-slavery and human trafficking systems annually to keep them aligned with best practice and update them as needed.

Further steps

We recognise the extremely complex nature of modern slavery, and we will continue to monitor our operational practices. We have identified the following as key actions for 2026:

- Updating and enhancing our mandatory contractual obligations and audit rights for all suppliers to ensure compliance throughout our supply chain.
- Embedding of the 2025 training module within HRIS system ensuring a two-year repeat training cycle for all employees. Further on-site modern slavery risk assessments at additional Kuehne+Nagel sites in the UK, based on risk potential and profile
- Biannual review and discussion include broader stakeholders, bringing together business units, procurement managers, HR, Sustainability, QSHE, legal and compliance teams.

The Board of Kuehne + Nagel Limited as well as the Board of Kuehne + Nagel Management AG recognise the importance of tackling human trafficking and modern slavery and the directors aim to ensure that slavery and human trafficking have no part in our operations and supply chain. We believe our current measures are effective in mitigating modern slavery risks, although we continue to enhance our approach in response to evolving risks and best practice.

This statement has been approved by the Managing Director of Kuehne + Nagel Limited for the financial year ended 31 December 2025. Responsibility for implementing this statement sits with senior management, supported by our Anti-Slavery and Human Rights Steering Group.



Aaron Scott

Managing Director on behalf of the UK Board