

Modern Slavery Statement

DHL Supply Chain 2025

Excellence. Simply delivered.



At DHL Supply Chain UKI, we recognise that evolving labour models, increased volatility and increased digitalisation continue to heighten modern slavery risks across global supply chains. As a leading logistics organisation, we remain fully committed to upholding the highest standards of ethical conduct and human rights within our operations and through our supply chain.


More than a decade after the UK Modern Slavery Act 2015 was introduced, expectations for transparency and due diligence remain high. DHL Supply Chain UKI meets these requirements through strong governance, clear accountability, and effective risk-management processes designed to prevent, identify, and respond to indicators of modern slavery.

Our approach is grounded in the DHL Group Human Rights Policy Statement, which sets minimum standards for fair working conditions across all operations. Responsibility for implementing this policy within the UKI business remains with myself and my senior leadership team to ensure that human rights considerations are embedded into our culture and day to day operations.

Throughout 2025, we continued to strengthen our modern slavery and human rights programme across our own and our suppliers operations including:

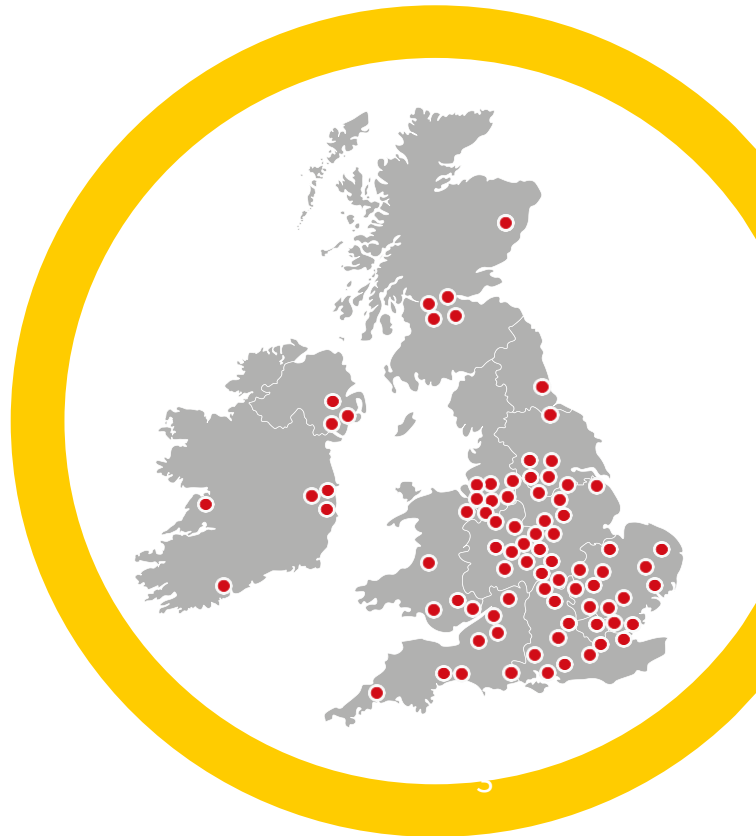
- Completion of mandatory Code of Conduct and Human Rights training for relevant employees.
- Participation in the Annual Human Rights Risk Assessments across all UKI legal entities and the global Internal Controls Assessments.
- Strengthened supplier due diligence and increased assurance activity of 3rd party suppliers, working in partnership with suppliers to improve their own internal controls.
- Further embedding of the Human Rights Compliance function across the organisation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes DHL Supply Chain UKI's Modern Slavery Statement for the financial year ending 31 December 2025. It has been reviewed and approved by the DHL Supply Chain UKI Board.

A man with short brown hair, smiling, wearing a red and yellow DHL uniform jacket. The DHL logo is visible on the yellow shoulder panel. He is standing in front of a window with a blurred outdoor scene.

Martin Willmor
CEO, DHL Supply
Chain UKI
May 2026

About DHL and our Supply Chains



31,172
employees



307
operations



20 million
ft²



420
customers



5,000+
vehicles

DHL Group is the world's leading logistics company with approximately 584,000 employees operating in over 220 countries and territories. The Group connects people and markets and is an enabler of global trade.

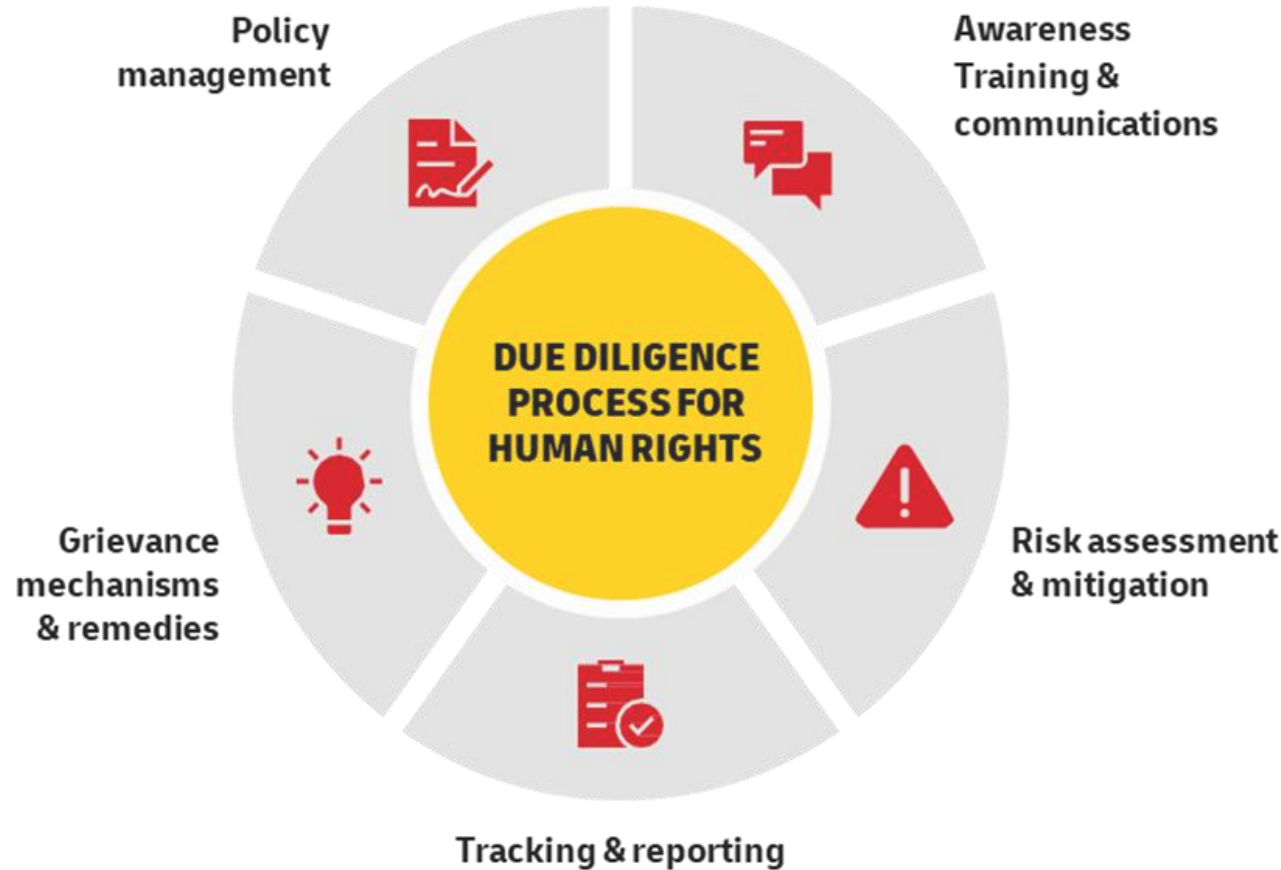
It aspires to be the first choice for customers, employees, investors, and green logistics worldwide. DHL contributes to the world through sustainable business practices, corporate citizenship, and environmental activities. We want to lead the way towards sustainable logistics – we want to be the Green 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 Supply Chain (DSC) operates across five regions with 187,000 supply chain experts in over fifty countries. Our core business in the Supply Chain division includes warehousing, transport, and value-added services for all strategic industry sectors.

In the UKI region we partner around 420 customers in terms of logistics, operating under six Business Units; Network Transport Solutions, eCommerce & Retail, Consumer & Convenience, Healthcare & Specialist Logistics, Manufacturing Logistics and Ireland.

As part of the DHL Group, DSC UKI 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 and 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 DSC UKI 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 compliance management 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:

- Policy management
- Awareness
- Risk assessment & mitigation
- Tracking & reporting
- 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 characterised 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
- The supplier's code of conduct, provided that we have classified it as equivalent, and it has been implemented by the supplier
- Mutual recognition of the companies' own codes of conduct if both contracting parties are simultaneously suppliers and customers and the codes can be 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 2025 this metric amounted to at least €38.2 billion (2024; at least €39.2 billion), which corresponds to a share of 96.9% of eligible supplier spend (2024: 95.7%)

Prevention of Illegal Working

This policy outlines the DSC UKI approach to 'Employing Young Adults' stipulating that generally the Company does not employ anyone under 18 years of age, except for individuals aged 16 or 17 employed on an apprenticeship or working within an office-based environment.

Whistleblower Policy

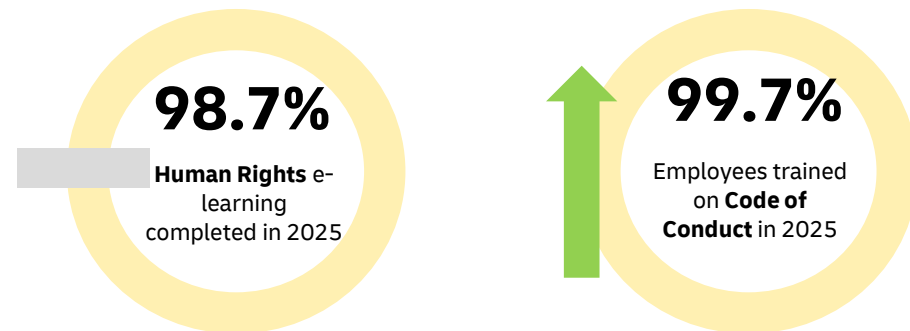
This policy outlines the mechanism in place which allows anyone to raise concerns around modern slavery, forced labour and human trafficking and includes how individuals raising a concern will be protected from retaliatory behaviour for blowing the whistle under UK regulations.

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 a Greater DHL 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 updated 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 Webcast** is 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 familiarise 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 Supply Chain UKI 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
- Global Membership of SEDEX.

Supplier Due Diligence and Risk Assessment Process

The minimum requirements for risk assessment are based on risk potential, which we re-evaluate annually.

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.

The selection of suppliers for risk assessments is based on the following criteria, which may be applied individually or in combination:

- Frequency of cooperation
- Continuity of the business relationship
- Amount of expenditure
- Geographical location
- In addition, individual assessments may be carried out.

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.

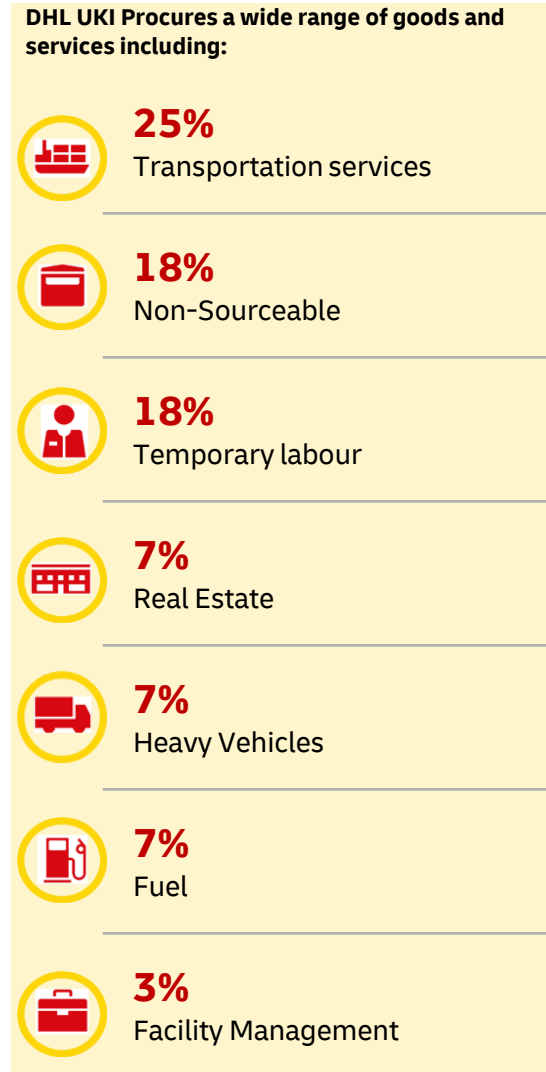
The Group-wide risk management system for supplier evaluations (Shield) is continuously reviewed for potential improvements and adjusted as necessary.

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



3. Risk Assessment & Mitigation

Identified Key Risk Areas

DHL Group, for the year under review, has assessed six 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
- Cleaning Companies

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
	<i>Consider phase out if failure.</i>



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. DSC UKI regularly evaluates and reviews how best to improve and strengthen our approach to addressing human rights in our sphere of influence.

External Audits Completed

As part of DSC UKI's efforts to appropriately document risk-based due diligence pertaining to the hiring and appropriate regular oversight of suppliers, 90 Supplier Due Diligence assessments were conducted in 2025 across the potential high-risk supplier human rights categories. Of the 90 suppliers assessed, only 3 were deemed as high risk, 2 due to their 1st tier suppliers and 1 identified through supplier audits. 18 were medium risk and 69 were deemed low risk. These did not highlight any modern slavery risks or adverse findings. No escalations were required to the Regional Compliance or Procurement Governance team.

Effectiveness of the Compliance Incident Reporting System

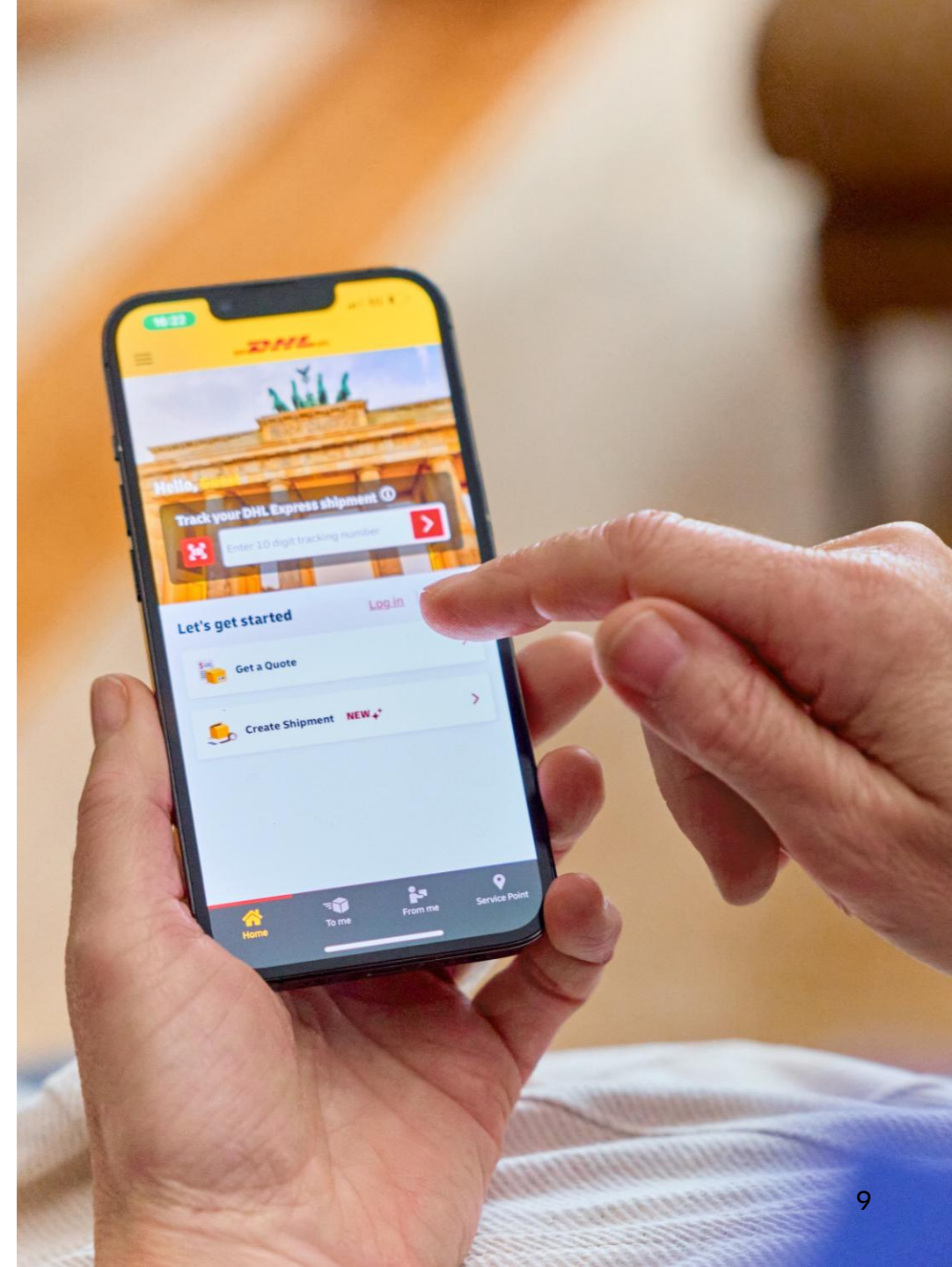
Identification and management of non-compliance are essential in implementing certain corporate governance principles and standards, specifically provisions on the fight against human rights violations, corruption, and criminal law. In this reporting year, there have been no compliance issues raised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

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 DSC UKI 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

DSC UKI will continue to monitor 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 audits and assessments.

- Continue to assess our suppliers using the internal Supplier Due Diligence process, along with continuing to work with high-risk suppliers in developing adequate risk controls.
- Introduction of Global Compliance oversight for investigations concerning forced labour and/or child labour complaints.
- Complete ethical trade assessments of in scope suppliers and implement action plans for improvement where required.
- Increase Human Rights Awareness, via the revised Building a Greater DHL training, which Build closer collaboration with our customers to provide assurance via the SEDEX tool and SMETA Audits, which incorporate assessments on Modern Slavery risks.



DSC UKI 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 Services Limited, DHL Supply Chain Limited, DHL Real Estate (UK) Limited, DigiHaul Limited and McGregor Cory Limited reviewed and approved the Statement in their capacity as principal governing body.



Director: Martin Willmor
DHL SUPPLY CHAIN LIMITED



Director: Martin Willmor
MCGREGOR CORY LIMITED



Director: Gareth Osborn
DHL REAL ESTATE (UK) LIMITED



Director: Nicki Hay
DHL SERVICES LIMITED



Director: Martin Willmor
DIGIHAUL LIMITED