

## **DHL International (UK) Ltd - Modern Slavery Statement For Financial Year Ending 31 December 2024**

### **Introduction**

This statement is made by DHL International (UK) Ltd, DHL Aviation (UK) Ltd and DHL Air (UK) Ltd (together referred to as “DHL International UK Ltd” for the purposes of this statement). This is DHL International UK Ltd’s Modern Slavery Statement in line with Section 54 of the Modern Slavery Act 2015.

### **Overview and Business Structure**

DHL International UK Ltd is part of the DHL Group (“the Group”) DHL International UK Ltd provides international and domestic express logistics services for parcels to a range of customers and consumers.

As part of the Group, DHL International UK Ltd 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. The Group’s Human Rights Policy statement complements the Group’s Code of Conduct, the basis and benchmark for all guidelines and regulations that ensure responsible and ethically irreproachable conduct within the Group. The policy statement defines its minimum standards for working conditions and human rights in the Group’s employee and partner relations. For our suppliers, the Group’s Supplier Code of Conduct sets out the required Human Rights minimum standards. All policies are regularly reviewed to ensure they are relevant, up to date and supplemented with new topics where necessary.

DHL International (UK) Ltd, as an employer, leads by example: its adoption of the Group’s Human Rights Policy statement anchors minimum standards for fair working conditions and human rights in employee relations. The Group supports the following globally recognised declarations, principles and goals:

- the Ten principles of the UN Global Compact,
- the Universal Declaration of Human Rights,
- the International Labour Organization’s Declaration on the four Fundamental Principles and Rights at Work,

- the OECD Guidelines for Multinational Enterprises,
- the UN Guiding Principles on Business and Human Rights,
- the UN Sustainable Development Goals.

Accountability for the implementation of this policy is overseen by DHL International UK Ltd senior management. This ensures that we are clear about the responsibility to respect human rights and its day-to-day implementation.



The Group's Code of Conduct is underpinned by key themes. These are: respect for human rights, equal opportunity, recruitment and employment, promoting health and safety in the workplace, transparency and an unequivocal stand against discrimination, bribery and corruption.

The Code of Conduct is available on the Group's intranet in more than 20 languages. Employees participate in online compliance programmes about the Code and its application to everyday scenarios at work and when doing business; this learning also forms an integral part of the induction process.

The Group's ethical and environmental values and principles are enshrined in its Supplier Code of Conduct which is a component of all Group contracts with third party suppliers and partners, including those entered by DHL International (UK) Ltd. In turn, this encourages suppliers to implement the same standards in their own supply chains. The Supplier Code of Conduct sets out what the Group means by respect for human rights and fair working conditions, in the same way as these are understood by its own employees. There are a number of areas covered including the extract below:

## **Forced labour**

The Group rejects all forms of forced and compulsory labour. All labour must be voluntary. We do not tolerate any forms of forced labour, including bonded labour, indentured labour, military labour, modern forms of slavery and any form of human trafficking. This applies across all our divisions globally and we expect all our suppliers and partners to share our commitment and to conduct their business in an ethical manner and act with integrity.

Suppliers shall ensure that employees are not required to pay fees or make payments of any kind in return for employment. Punishments and physical and mental coercion are prohibited.

The Group's Employee Relations (ER) management system helps ensure consistent and effective implementation of its Human Rights Policy and common processes in the different countries and cultures which are represented throughout the Group. The ER management system aims to satisfy the requirements of the UN Guiding Principles on Business and Human Rights.

The main areas of risk in relation to modern slavery in DHL International UK Ltd's operations have been identified as agency workers and other types of sub-contracted labour.

## **Due Diligence, Auditing and Training**

The Group has a Human Rights management system in place to ensure uniform implementation of our principles throughout the Group as outlined in our Human Rights Policy Statement.



The Group's Code of Conduct, Supplier Code of Conduct, Human Rights policy, and e-learning modules are mandatory for all line managers and must be refreshed on a bi-annual basis. Our Procurement teams are expected to take steps to ensure that any supplier of labour has read and understood the Supplier Code of Conduct and will not be engaged unless they demonstrate that commitment in writing by accepting those terms. Only labour suppliers on an approved 'core-supplier' list may be used by DHL International UK Ltd operations. This approved supplier list has been significantly reduced in recent years to enable DHL International UK Ltd to have greater visibility of its providers and monitor compliance more easily.

DHL International UK Ltd utilises internal and external auditing capabilities to identify potential or actual risk and opportunity with its suppliers. Internal auditors are trained to SMETA standards and use an audit process aligned to the ETI base code requirements. Audits are scheduled following risk assessments based on volume of labour supplied and where second tier supply and beyond is identified.

### **Whistle-blower Hotline**

DHL International UK Ltd operates an anonymous 'Compliance Hotline' where employees are able to share concerns/issues outside of their normal reporting structures, 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 compliance team.

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

DHL International UK Ltd will continue to monitor the modern slavery risk through risk assessments and due diligence, both in its own operations and labour suppliers. It will continue to monitor its labour suppliers' compliance with the Supplier Code of Conduct through random audits.


DHL International UK Ltd will strive to increase general awareness of modern slavery in the UK 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.

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

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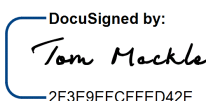
DIRECTOR NAME: David Duncan

DIRECTOR NAME: Russell Smith

NAME OF COMPANY: **DHL International (UK) Ltd**

NAME OF COMPANY: **DHL Aviation (UK) Ltd**

DATE: 30-04-25

DIRECTOR SIGNATURE: 2F3E9EFCFFED42E...

DIRECTOR NAME: Tom Mackle

NAME OF COMPANY: **DHL Air (UK) Ltd**