



XPO Logistics – Slavery and Human Trafficking Statement for the year ending 31st December 2021

Our Commitment:

This statement is made by XPO Transport Solutions UK Limited, XPO Maintenance UK Limited, XPO Global Forwarding UK Limited and XPO Bulk UK Limited (together referred to as “XPO”) operating in the UK as part of the XPO group of companies, pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes XPO’s slavery and human trafficking statement for the financial year 1 January to 31 December 2021.

Our culture at XPO is about achieving results through teamwork, which requires us to always perform to the highest standards of business conduct. As a global leader in our industry, we endeavour to set an example which is beyond reproach.

We are committed to:

- Acting with integrity in all our business dealings
- Treating each other with dignity and respect
- Complying with all applicable policies, laws, and regulations
- Upholding the standards of behaviour set out in the XPO Logistics Code of Business Ethics (“COBE”)

XPO is committed to conducting business in a manner that respects human rights and the dignity of all people. We acknowledge our responsibilities in accordance with the Modern Slavery Act 2015 (the “MSA”) and we do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

Business Structure:

XPO Logistics, Inc. (NYSE: XPO) is a leading provider of freight transportation services, primarily less-than-truckload (LTL) and truck brokerage. XPO uses its proprietary technology, including the cutting-edge XPO Connect® automated freight marketplace, to move goods efficiently through supply chains. The company’s global network serves 50,000 shippers with approximately 731 locations and 42,000 employees, and is headquartered in Greenwich, Conn., USA.

Within Europe, XPO employs approximately 13,640 people as drivers, warehouse staff and in corporate positions in 14 countries including the Czech Republic, France, Germany, Ireland, Italy, Luxembourg, Morocco, Netherlands, Poland, Portugal, Romania, Slovakia, Spain and the United Kingdom.

Within the UK, we have four main operating companies employing approximately 4300 employees at the end of 2021.

XPO’s Operations and Supply Chains:

Within the UK we provide freight brokerage, last mile, expedite, intermodal, drayage, less-than-truckload, full truckload, and global forwarding services.

Our supply chains are extensive given the global reach of our operations. Key areas within the supply chain include labour (including subcontract labour and agency workers), warehousing and transport facilities, vehicles, and equipment.

Steps taken to proactively prevent modern slavery in our supply chains:

We have taken steps to ensure that XPO is open and transparent in the way we operate our business and that our transactions and relationships are firmly compliant with our responsibilities under the MSA. Specifically, we focus our MSA compliance activities in three main areas: policy, risk assessment and due diligence.

As we prepare for post-pandemic life, our priorities have continued to centre around safeguarding our employees and those who interact with our business.

We have taken the following steps to prioritise health, safety and wellbeing following the pandemic.

- **Personal protective equipment.** We provide PPE and sanitization supplies to employees and have implemented procurement measures to ensure an ample supply.
- **Agile working.** Employees whose job does not necessitate on-site work can choose to work flexibly, spending part of the week in the office and part at home
- **Enhanced cleaning.** Additional daily cleaning measures continue
- **Isolation and Testing.** In line with Government guidance, we encourage all employees to refrain from work and to get tested if experiencing any Covid-19 related symptoms. Absence policies also have been adjusted to encourage employees to take precautionary measures.

In addition to the steps taken in relation to the Covid-19 pandemic, we have taken the following steps in our UK business to combat slavery and trafficking during the last financial year:

Policy

XPO respects human rights and treats everyone who has contact with our business with dignity. These principles are set out in the COBE, which sets forth the standards of ethical behaviour at the company, and are supported and promoted by XPO's Ethics and Compliance department.

The COBE is supplemented by a set of additional policies, which includes both a global Human Trafficking policy and a UK Anti-Slavery and Human Trafficking policy. The UK specific policy is applicable to all XPO employees, officers and directors and other parties acting on XPO's behalf, such as its suppliers and partners in respect of our business in the UK.

The COBE and policies are communicated to all employees when they join XPO. During their employment, we provide employees ongoing training on the COBE and its associated policies. We also deliver specific Respect in the Workplace training to increase awareness across all our operations globally.

In the UK, we provide an Anti-Slavery and Human Trafficking on-line training module to all new managers as part of their induction. In addition to the mandatory training for new managers, this on-line training is also available to all UK employees through our "XPO University" learning management platform. In 2021 every employee was also required to complete the annual COBE training.

In January 2021, XPO recognised Slavery and Human Trafficking Prevention Month in the US to build awareness, share our company commitment, help employees spot signs of exploitation, and provide information about where to report any concerns. These materials were shared across all our UK sites. Our European CEO and our Chief Diversity Officer also shared their perspectives on our fight against modern slavery with dedicated blog posts.

Risk Assessment

In 2019, XPO worked with external experts to develop a robust methodology to identify and map risks related to human rights, health and safety, and the environment within our direct and indirect operations across Europe. This resulted in a Vigilance Plan (required under the French law for our European group companies) that addresses issues of human rights, health and safety, and the environment within our operations and supply chains.

In 2021, we continued our risk assessment and risk mapping activities within each of our business units across Europe, which showed that our subcontract labour and agency workers pose the greatest human trafficking and modern slavery risk and provided detailed information to assist in managing this risk.

We will continue to monitor and review our activities in accordance with our Vigilance Plan which will in turn assist in our compliance with the Modern Slavery Act.

Due Diligence

All supplier appointments are managed by a centralised procurement team which provides a consistent approach and control over our appointment of agency labour.

The appointment of transportation subcontractors has also been standardized providing better knowledge and oversight of the third parties with which we work.

We have undertaken an exercise to ensure full compliance to the IR35 legislation introduced in April 2021. The vast majority of temporary workers assigned to XPO are Pay As You Earn (PAYE), paid either directly by an employment agency or via a Freelancer & Contractor Services Association (FCSA) approved payroll company. XPO undertakes to ensure that all temporary workers are offered a free choice of payroll method and that a declaration to this effect is retained as part of their personnel file. XPO has the right to audit all agencies engaged and the declaration is part of the protocol. This ensures that workers supplied to us on a temporary or subcontract basis are treated and paid lawfully.

Future steps to prevent modern slavery in our supply chains:

We will continue to monitor the modern slavery risk by way of policy, risk assessment, training and due diligence. Specifically;

- We will implement a Right to Work application that enhances the robustness of our right to work checks and compliance
- We will review and revise our Third Party Due Diligence Policy and Supplier Code of Conduct.
- We will continue to use our internal "XPO University" learning management platform to deliver modern slavery and human trafficking training and increase awareness to all employees on a regular and mandatory basis.
- We will review our risk mapping work in the areas of human rights, health and safety and environment, including modern slavery and human trafficking risks on an annual basis.
- We will monitor and review the impact of our revised Third Party Due Diligence Policy in relation to our labour agencies and labour sub-contractors and continue to audit our sites to ensure that

XPO Logistics

all sites are recruiting workers from our approved agencies and sub-contractors in compliance with the law and our Code of Business Ethics.


Any concerns regarding human trafficking or modern slavery within our business should be reported to ComplianceOffice@xpo.com or www.xpo.ethicspoint.com

This statement was approved by the Boards of XPO Transport Solutions Limited, XPO Global Forwarding UK Limited, XPO Maintenance UK Limited and XPO Bulk UK Limited.

Signed:



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XPO Transport Solutions UK Limited



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