

DHL ECOMMERCE UK MODERN SLAVERY STATEMENT



INTRODUCTION

This is the fifth annual Modern Slavery Statement to be published by DHL eCommerce UK (“DHL”), in line with the Modern Slavery Act 2015 (‘MSA’). This statement covers DHL for the financial year ending 31 December 2022. For our previous Modern Slavery Statement, [please click here](#).

DHL is fully committed to compliance with the MSA and all applicable legislation.

This statement details DHL’s efforts during the past year to ensure that it continues to abide by the MSA and throughout its supply chains.

DHL’S BUSINESS

Deutsche Post DHL Group (“the Group”/“DPDHL”), our parent company, is the largest postal services provider in Europe and the world’s leading logistics Group. Our global business is organised into five divisions: Post–Paket Deutschland, Express, Global Forwarding & Freight, e-Commerce Solutions, and Supply Chain.

[DHL Group | Corporate divisions \(dpdhl.com\)](#)

DHL eCommerce UK

DHL eCommerce UK is part of the Group and 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 defines its minimum standards for fair working conditions and human rights in the Group’s employee and supplier relations. Taken together, our two codes – the Code of Conduct and the Supplier Code of Conduct constitute the Human Rights Policy. Both codes are regularly reviewed to ensure they are relevant, up to date and supplemented with new topics where necessary.

RELEVANT POLICIES:



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. They are based on the principles contained in the Universal Declaration of Human Rights, the ILO fundamental principles and rights at work and the UN Global Compact. The Code of Conduct is an integral component of employment contracts with DPDHL Group managers.

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The Code of Conduct is available on the Group's intranet in more than 20 languages. Employees participate in online compliance programs 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 including its UK contracts and its procurement contracts. 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:** Suppliers shall not use any form of forced, bonded or involuntary labor. 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 has made the Supplier Code of Conduct available in 30 languages and also offers training courses on its use. The main content and requirements of the Code are outlined in an interactive module on the Group's website, a measure designed to promote and encourage a shared understanding of the Groups values and goals.

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.

This highlights DHL's absolute commitment to running its businesses ethically and that this is a fundamental part of DHL's business relationships. Such policies are integral to ensure that slavery, serfdom or human trafficking play no part in DHL's organisation or within its supply chains.

[DHL Group | Code of Conduct \(dpdhl.com\)](https://dpdhl.com)

RISK

DHL has identified sub-contractor labour and agency workers as the main area, where there is a risk that human trafficking and modern slavery could occur.

Accordingly DHL continues to work with contractors, suppliers, business partners and agencies to ensure that they are open and transparent in their activities and are compliant with the MSA. This is done through the use of a Preferred Supplier List for agency and sub-contractor staff for DHL. All suppliers on this list are under specific formal agreements.

Furthermore, DHL has in place an independently administered Compliance Hotline available to all employees and others to raise any concerns that they have.

DUE DILIGENCE

DHL is committed to establishing a joint journey with our suppliers to build sustainable, socially and environmentally responsible supply chains.

DHL operates a strict vetting procedure for all employees regardless of how they may present to DHL.

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DHL also conducts internal audits which examine local processes and assess whether these are suitable for reaching defined objectives and values, and whether these objectives can be met. Internal audits were conducted throughout the Group that were either directly or indirectly related to compliance topics or to compliance with the Supplier Code of Conduct during procurement processes.

Furthermore, DHL conducts random audits on its suppliers to ensure that they comply with the Supplier Code of Conduct. If a supplier is failing in its compliance, it must bindingly commit to address and remedy non-compliant behaviour as quickly as realistically possible and follow-up evaluations are conducted. If the supplier fails to meet our requirements, either in part or in full, further action is taken; in some cases, this can mean the termination of a business relationship.

TRAINING

Mandatory training on the DPDHL Code of Conduct every two (2) years, which specifically refers to the UN Global Compact. As stated above we use online seminars to familiarise employees with its contents and application in everyday scenarios; the seminars also form an integral part of the induction process. This training is mandatory for members of management since they perform an important function as role models.

NEXT STEPS

DHL is committed to continuing to ensure only suppliers who are compliant with the MSA are used. DHL will continue training new and existing staff members on the importance of the DPDHL Code of Conduct and how this applies to its supplier arrangements.

SIGNATURES

A handwritten signature in black ink, appearing to read 'Peter Fuller'.

Peter Fuller
Chief Executive Officer
DHL eCommerce UK

A handwritten signature in black ink, appearing to read 'Jaspreet Lyall'.

Jaspreet Lyall
Chief Finance Officer
DHL eCommerce
UK

A handwritten signature in black ink, appearing to read 'Scott Laird'.

Scott Laird
Vice President Operations
DHL eCommerce UK

Date: 5 October 2023