

GXO Logistics Slavery and Human Trafficking Statement for the year ending 31 December 2022

Our Commitment

This statement is made by GXO Logistics UK Limited, GXO Logistics Services UK Limited, GXO Logistics Drinks Limited, GXO Logistics FST Limited, GXO Logistics UK II Limited, Servicecare Support Services Limited, Repairtech Limited and Northern Commercials (Mirfield) Limited (together referred to as “GXO UK”) operating in the UK as part of the GXO group of companies (“GXO”), pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes GXO’s slavery and human trafficking statement for the financial year 1 January to 31 December 2022.

As a global leader in our industry, GXO has a responsibility to set an example that is beyond reproach. At GXO, how we do things is as important as the results we achieve. We support our employees, suppliers and customers and endeavour to operate with a culture that makes a positive impact and is safe, inclusive, ethical, lawful and respectful.

Our GXO Code of Business Ethics (the “Code”) and its associated policies are the blueprint for our business culture and standards and all GXO officers, directors, team members and third-party representatives are expected to comply with our Code.

GXO is fully 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 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

In May 2022 GXO acquired the Clipper Logistics plc group of companies, a retail logistics company carrying out business across the UK and in Germany, Poland and the Netherlands. Clipper Logistics plc changed its name to GXO Logistics UK II Limited in January 2023 and its business operations in the UK are included in this Modern Slavery Statement.

Within the UK, GXO has 8 main operating companies with approximately 43,000 employees at the end of 2022.

GXO Logistics, Inc., headquartered in Greenwich, Connecticut, USA, is the parent company of the GXO group of companies including GXO UK. It is headquartered in Greenwich, Connecticut and is listed on the New York Stock Exchange. GXO Logistics, Inc has over 130,000 team members across 28 countries.

Operations and Supply Chain

GXO is the world’s largest pure-play contract logistics provider. Our customers are many of the world’s leading companies across a range of industries and geographies. GXO provides a range of supply chain services, including highly engineered solutions and value-added contract logistics services. We perform e-commerce fulfilment, reverse logistics, factory and aftermarket support, packaging and labelling, and distribution.

Our supply chains are extensive given the global reach of our operations. Critical areas to our business include labour (including subcontract labour and agency workers), warehousing facilities, technology and automation and equipment as well as uniforms and personal protective equipment.

Our customers rely on us to respond quickly to fluctuations in demands for labour. We are able to do this by partnering with labour agencies and sub-contractors who have been approved through our Third-Party due diligence procedures and who commit to comply with our Anti-Slavery and Human Trafficking Policy, our Code of Business Ethics and our Business Partner Code of Conduct.

Steps Taken to Proactively Prevent Modern Slavery in Our Supply Chains:

Our culture at GXO is about achieving results by doing business the right way. As part of that commitment, we take proactive steps to ensure that our transactions and relationships are firmly compliant with our responsibilities under the Modern Slavery Act. Specifically, we focus on three key areas: policies and training, risk assessments and due diligence.

Policies and Training

GXO has adopted a Code of Business Ethics and a global ethics and compliance programme which clearly states our support for human rights and the principle of treating all people with dignity and respect. This Code is a blueprint of GXO's business standards.

The Code is communicated to all employees when they join GXO and they continue to receive training and communications on the Code and its associated policies during the course of their employment. We also deliver specific Respect in the Workplace training and communications across our operations globally.

The Code is accompanied by a set of more detailed policies which include, in the UK, our Anti-Slavery and Human Trafficking policy, our Third-Party Due Diligence Policy and our Business Partner Code of Conduct.

Our Anti-Slavery and Human Trafficking Policy is applicable to all GXO UK employees, officers and directors and other parties acting on GXO UK's behalf, such as its suppliers and partners in respect of our business in the UK. GXO also has a Human Trafficking policy which is applicable to its global operations.

Training on our Code of Business Ethics and its associated policies is part of our annual mandatory training programme. For those colleagues who are office based or have GXO email addresses the training is accessed via our GXO University learning platform. For colleagues working in our warehouses and transport services who do not have GXO email addresses we provide site-based training sessions.

In the UK we also provide an Anti-Slavery and Human Trafficking online training module to all new managers as part of their induction. In addition to the mandatory training for new starters at the management level, the online training is conducted as part of regular "refresher" training for key employees and managers. It is available to all UK employees through our "GXO University" learning management platform and is supported by other "on-site" awareness initiatives.

Our Third Party Due Diligence Policy, which forms part of our Code of Business Ethics policies, was reviewed and revised in 2021 to specifically include temporary labour agencies, transport sub-contracts as parties that are required to undergo an enhanced level of due diligence prior to GXO

contracting with them. In 2022 we also launched a Business Partner Code of Conduct which all new vendors that we contract with are required to adhere to. The Business Partner Code of Conduct sets out the steps that we expect our partners to take to combat the risks of modern slavery and human trafficking.

In addition to our global Ethics & Compliance program, GXO is committed to developing an industry leading Environment, Social and Governance (ESG) Programme.

Risk Assessments

We continue to assess the risk of modern slavery and human trafficking within our business operations and our supply chains.

GXO has an active process for identifying, managing and monitoring risk within its business through its enterprise risk management (ERM) framework. The ERM process is overseen by the GXO Global Risk Committee which is made up of executives, senior management and subject matter experts in the areas of Legal, Compliance, Finance, Risk, HR, IT, and Health and Safety. Risks are identified strategically and responded to through our business processes and operations or identified within our businesses and escalated up through the ERM structure to the Global Risk Committee for oversight. During 2022 we carried out a group wide Enterprise Risk Management Assessment. This included questions relevant to temporary labour and the identifying the risk of modern slavery in our operations.

We also continue to develop our ESG framework which includes reviewing the environment, social and governance topics and risks most relevant to our industry and operations. Risks and issues around Modern Slavery and Human Trafficking are included within that framework. A copy of our annual ESG Report which can be found at <https://gxo.com/wp-content/uploads/2023/04/2022-GXO-ESG-Report.pdf>.

We carry out regular Employee Engagement exercises which encompass multiple labour-related issues including our continued commitment to eradicate any instances of human trafficking, child labour, forced or compulsory labour or any other human rights abuses and GXO will continue to prioritize these exercises over the short and long term.

We will continue to monitor high risk areas for modern slavery that we have identified through these current risk assessments and through our previous risk assessments, namely our temporary labour agencies and sub-contract labour and suppliers.

Evolving developments in forced labour laws have also heightened the importance of working closely with our customers to identify the origins of goods that we may be handling on their behalf to ensure that none of been produced using forced labour.

Due Diligence

Our Third-Party Due Diligence Policy requires that due diligence is carried out on all third parties (including vendors and suppliers). This includes screening through our Third-Party Screening Software and additional due diligence as required. In our 2021 statement we reported that enhanced due diligence was carried out on temporary labour agencies and during 2022 we included cleaning, catering and construction services in our enhanced due diligence programme as we have identified these as sectors where there is a possible risk of forced labour.

During the year 2022 we have carried out Right to Work audits for our UK employees. We also carried out right to work audits and holiday pay audits within our temporary labour agencies. We have an ongoing programme of HR site audits which include reviewing right to work procedures and assessing modern slavery risks. Our policy is to cease working with any temporary labour agency that does not meet our standards.

Future Steps to Prevent Modern Slavery in our Operations and Supply Chain:

We will continue to monitor modern slavery risks through policies and training, risk assessments and due diligence. Specifically:

- We will continue to use our internal “GXO University” learning management platform to deliver modern slavery and human trafficking training and awareness to all employees on a regular and mandatory basis.
- We will continue to carry out risk assessments and 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 through our ERM Framework.
- We will monitor and review the impact of our revised Third-Party Due Diligence Policy and Business Partner Code of Conduct.
- We will use our Third-Party Screening Software to screen all new and existing temporary labour agencies and will continue to audit our sites to ensure that all sites are recruiting workers from our approved agencies and sub-contractors which comply with the law and our GXO Code of Business Ethics.
- We will conduct audits of our own operations and supply chains, as appropriate.

Any concerns regarding human trafficking or modern slavery within our business should be reported to us at ethics@gxo.com or www.gxo.ethicspoint.com.

This statement was approved by the Boards of GXO Logistics UK Limited, GXO Logistics Services UK Limited, GXO Logistics Drinks Limited and GXO Logistics FST Limited, Servicecare Support Services Limited, Repairtech Limited and Northern Commercials (Mirfield) Limited.

Signed:



David Thomas

Director

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