



Human Trafficking Policy

1. APPLICABILITY

This Human Trafficking Policy (“Policy”) applies to GXO Logistics, Inc., including all its subsidiaries, divisions, and other operating entities (collectively, “GXO” or the “Company”). All directors, officers and employees of GXO, and third parties acting on our behalf, are subject to and responsible for complying with the requirements of this Policy. As used in this Policy, the term “Company” should be read to include all persons and entities subject to this Policy.

To the extent that this policy differs from the requirements of local laws or policies which may have more onerous requirements than this policy, the terms of the local law or policy will prevail in relation to GXO’s operations within that jurisdiction.

2. OVERVIEW

GXO is committed to conducting business in a manner that respects the human rights and dignity of all people. We will not tolerate any conduct that contributes to, facilitates or encourages human trafficking, child labor, forced labor or compulsory labor. We support government policies in the US and other countries that combat human trafficking, and we expect our customers, subcontractors and suppliers to respect human rights laws.

Human trafficking constitutes a violation of human rights in which the victims are deprived of their fundamental freedoms. These activities include using force, fraud or coercion to subject a person to involuntary servitude; obtaining labor from a person by threats of serious harm to that person or another person; sex trafficking, procuring commercial sex acts; and other activities that impede fundamental freedoms.

GXO prohibits employees, subcontractors, agents, vendors, partners and others with whom GXO conducts business from engaging in practices relating to trafficking in persons, including:

- Engaging in any form of trafficking persons
- Procuring sex acts during the performance of a contract
- Procuring or participating in sex acts during working hours or using GXO assets
- Using forced labor in the performance of any work related to a contract

- Destroying or denying access to a person’s identity documents such as drivers’ license, passport or other identity documents
- Using recruiters that do not comply with local labor laws in the country in which the recruiting takes place
- Charging applicants recruitment fees
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working with GXO
- Providing housing that fails to meet host country standards
- Failing to provide an employment contract or work document where required by law

3. REPORTING

All persons subject to this Policy must immediately report any misconduct or potential violations of this Policy and/or applicable anti-discrimination laws. GXO does not permit retaliation against any person who, in good faith, reports any concerns, misconduct, and/or potential violations of Company policy or applicable laws.

Reports can be submitted directly to any supervisor, any member of Human Resources, and/or the Ethics & Compliance Office at ethics@gxo.com. Additionally, you can visit our Ethics website at <https://ethics.gxo.com> where you can find alternative reporting options. Your concerns can be reported anonymously, unless otherwise prohibited by applicable local law. Please see the Company’s Code of Business Ethics for additional information regarding reporting options.

Additional information and guidance regarding this Policy can be obtained from the Ethics & Compliance Office at ethics@gxo.com.

4. POLICY EXCEPTIONS

Any exception to or deviation from this Policy must be approved in writing by the Company’s Chief Compliance Officer.

5. FAILURE TO COMPLY

Failure to comply with this Policy could have serious consequences for the Company and the individuals involved, including civil or criminal prosecution, fines and possible imprisonment. Violations of this Policy may also result in serious disciplinary action, including termination of employment.