

GXO Logistics Slavery and Human Trafficking Statement for the year ending 31 December 2024

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, GXO ServiceTech UK Limited (formerly Servicecare Support Services Limited), Northern Commercials (Mirfield) Limited and PFS Global Services UK 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 2024.

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

Within the UK, GXO has 8 operating companies with approximately 40,000 employees at the end of 2024.

GXO Logistics, Inc., is the parent company of the GXO group of companies including GXO UK. It is headquartered in Greenwich, Connecticut, USA and is listed on the New York Stock Exchange. GXO Logistics, Inc. had approximately 130,000 team members globally at the end of 2024.

In April 2024 GXO completed an acquisition of Wincanton plc. This acquisition expanded GXO’s offering in several key strategic growth sectors in the UK. The acquisition was subject to review by the UK’s Competition and Markets Authority throughout 2024. Due to this review and the regulatory firewall requirements that it imposed, Wincanton data and operations are not included in this Modern Slavery statement but will be included in our statement for the year ending December 2025.

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.

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 part of our annual mandatory training programme for key employees and managers. It is available to all UK employees through our "GXO University" learning management platform.

Our Third Party Due Diligence Policy, which forms part of our Code of Business Ethics policies, requires that all temporary labour agencies and transport sub-contracts undergo an enhanced level of due diligence prior to GXO contracting with them and our 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.

During 2024 we introduced a UK Harassment and Discrimination policy. This extends to all workers including our sub contract labour workforce. This includes conducting workforce risk assessments and training.

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. Our labour force, including both our employees and sub contracted labour, is included in our ERM framework.

We also continue to develop our risk framework which includes reviewing the environmental, social and governance topics and risks most relevant to our industry and operations. Risks and issues around Human Rights, including Modern Slavery and Human Trafficking, are included within that framework. A copy of our annual Impact Report can be found at: <https://gxo.com/esg/>

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.

We continue to work closely with our customers to identify the origins of goods that we may be handling on their behalf to ensure that none have 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. Enhanced due diligence must be carried out on all temporary labour agencies, cleaning, catering and construction services as we have identified these as sectors where there is a possible risk of forced labour.

Our temporary labour providers are required to carry out Right to Work checks for workers on our sites who are not directly employed by GXO. This process is overseen by GXO's Procurement team. GXO's HR team runs checks to identify multiple use of bank account details for employees or addresses with multiple occupancy as these may be indicators of forced labour.

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.

During 2025 we will deliver Anti Harassment & Discrimination training

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 also carry out a Double Materiality Risk Assessment during 2025 across our global business in accordance with the EU CSRD regulation.

We will use our Third-Party Screening Software to screen all new and existing temporary labour agencies and will continue 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.

We will explore how best to leverage our local teams to deliver modern slavery awareness initiatives across our UK sites.

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, GXO Logistics FST Limited, GXO Logistics UK II Limited, GXO ServiceTech UK Limited (formerly Servicecare Support Services Limited), Northern Commercial (Mirfield) Limited and PSF Global Services UK Limited.

Signed:



RICHARD CAWSTON
Director



GAVIN WILLIAMS
Director

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