

GXO Logistics Slavery and Human Trafficking Statement for the year ending 31 December 2021

Our Commitment

This statement is made by GXO Logistics UK Limited, GXO Logistics Services UK Limited, GXO Logistics Drinks Limited and GXO Logistics FST 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 2021.

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 (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

For the period prior to 2nd August 2021, the business that is now GXO was part of XPO Logistics, Inc., a leading provider of supply chain solutions and transportation services. As of 2nd August 2021, GXO became a standalone entity, publicly listed on the New York Stock Exchange.

GXO Logistics, Inc., headquartered in Greenwich, Connecticut, USA, is the parent company of the GXO group of companies including GXO Logistics UK Limited, GXO Logistics Services UK Limited, GXO Logistics Drinks Limited and GXO Logistics FST Limited.

Within the UK, GXO UK had 4 main operating companies with approximately 31,000 employees at the end of 2021. Globally GXO Logistics, Inc. has over 100,000 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, as well as our Code of Business Ethics.

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. This 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.

In the UK we 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 also available to all UK employees through our "GXO University" learning management platform. The Anti-Slavery and Human Trafficking online training is also conducted as part of regular "refresher" training for key employees and managers.

In addition to our global Ethics & Compliance program, GXO is committed to developing an industry leading Environment, Social and Governance (ESG) Programme. During 2021, GXO appointed a global ESG Officer, created an Executive ESG Committee and a Global Risk Committee, and created a board-level committee to have oversight over the global ESG program. Additional information on GXO's ESG journey is available in GXO's inaugural ESG Report at <https://gxo.com/esg/>

Risk Assessments

During 2021, GXO undertook its first ESG materiality Assessment. Partnering with an independent firm, we conducted a comprehensive review of the environment, social and governance topics and risks most relevant to our industry.

Employee Engagement, encompassing 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, was identified in the Assessment as one of several key issues that GXO will continue to prioritize over the short and long term.

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 can be 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.

In addition to our ERM framework, we will continue to monitor high risk areas for modern slavery that we have identified through previous risk assessments; namely our temporary labour agencies and sub-contract labour and suppliers.

Evolving developments in forced labour laws, including the Uyghur Forced Labor Prevention Act (“UFPLA”) in the US, have 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

In our 2020 report, we referred to the changes that we had made to our Third Party Due Diligence Policy to ensure a consistent approach and maintain control over the appointment of temporary labour agencies by requiring them to go through an enhanced level of due diligence before being set up on our systems as an approved supplier. During 2021, we extended that approach to include companies providing cleaning, catering and construction services as we identified these as additional risk areas for forced labour. We have automated this due diligence process within our third party screening software.

During the year we have continued to audit our temporary labour agencies and are committed to removing any agencies from our approved list that do 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 implement our revised Third Party Due Diligence Policy and Supplier Code of Conduct.
- 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 continue to monitor and review the impact of our revised Third Party Due Diligence Policy and Procedures.
- 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.

Signed:



Gavin Williams
Director
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