



XPO Logistics –Slavery and Human Trafficking Statement for the year ending 31st December 2017

Our Commitment:

This statement is made by XPO Supply Chain UK Limited, XPO Transport Solutions UK Limited, XPO Maintenance UK Limited and XPO Bulk UK Limited (together referred to as “XPO”) operating in the UK as part of the XPO group of companies, pursuant to section 54 (1) of the Modern Slavery Act 2015, and constitutes XPO’s slavery and human trafficking statement for the financial year 1 January to 31 December 2017.

Our culture at XPO is about achieving results through teamwork, which requires us to perform to the highest standards of business conduct at all times. As a global leader in our industry, we endeavour to set an example which is beyond reproach.

We are committed to:

- Acting with integrity in all of our business dealings
- Treating each other with dignity and respect
- Complying with all applicable policies, laws and regulations
- Upholding our commitment to the “Integrity Matters” XPO Code of Business Ethics

XPO is 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:

XPO is a top ten global logistics business. We run our business as one, highly integrated network of people, technology and physical assets in 32 countries, with over 95,000 employees and 1,466 locations. We use our network to help customers manage their goods more efficiently throughout their supply chains.

XPO Logistics, Inc., headquartered in Greenwich, Connecticut, US, is the parent company of the XPO group.

Within Europe, we operate in 19 countries: Belgium, Czech Republic, Finland, France, Germany, Hungary, Ireland, Italy, Luxembourg, Netherlands, Poland, Portugal, Romania, Russia, Slovakia, Spain, Switzerland, Ukraine and the United Kingdom. Within the UK, we have five main operating companies employing approximately 22,000 employees.

XPO’s Operations and Supply Chains:

XPO has two reporting segments: logistics and transportation. Within these segments, the business is diversified by geographies, verticals and types of service.

In our logistics segment, we provide a range of supply chain services, including highly engineered solutions and high-value-add contract logistics. We perform e-commerce fulfilment, reverse logistics, factory and aftermarket support, packaging and labelling, distribution and managed transportation.



In our transportation segment, we provide freight brokerage, last mile, expedite, intermodal, drayage, less-than-truckload, full truckload, and global forwarding services. We have a strong franchise in each of our service offerings, including leading positions in fast-growing areas such as e-fulfilment.

Our supply chains are extensive given the global reach of our operations. Within the supply chain, the key areas are labour (including sub contract labour and agency workers), warehousing facilities, vehicles and equipment.

Steps taken to proactively prevent modern slavery in our supply chains:

In our statement for the financial year January – December 2016 we identified the proactive steps that XPO was taking to ensure that we are open and transparent in the way we operate our business, thus ensuring that our transactions and relationships are firmly compliant with our responsibilities under the Modern Slavery Act.

We did this by reference to our activities in three areas; policy, risk assessment and due diligence. To further our commitment to combating slavery and trafficking, we have taken the following steps in those areas over the period 1 January 2017 to 31 December 2017:

Policy

On a global level XPO applies its Code of Business Ethics (Code) as part of its “Integrity Matters” ethics and compliance programme. This Code is a blueprint of the Company’s business standards and its guiding principle is to treat everyone with dignity and respect.

In addition to the Code, during 2017, XPO issued an Anti-Slavery and Human Trafficking policy applicable to all XPO employees, officers and directors and other parties acting on XPO’s behalf, such as its suppliers and partners in respect of our business in the UK.

The policy was communicated as part of a wider awareness exercise in which executive team members, leadership group, management and HR received on-line training and a “Toolkit” comprising the policy, our 2016 MSA Statement and other education and awareness materials.

The e-learning was delivered to executive team members, leadership group and management. The training was mandatory for that group of people and has subsequently been cascaded through other relevant areas of the UK XPO workforce.

Risk Assessment

In our 2016 statement we identified sub-contract labour and agency workers as the main areas where there is a risk that human trafficking and modern slavery could occur. We continue to see this area as our main area of risk.

Accordingly we have worked with our contractors, suppliers, business partners and other third party suppliers or businesses to ensure that they are open and transparent in their activities and are compliant with the MSA.

Specifically we carry out an annual HR audit at each of our UK sites with a view, amongst other things, to identify and eliminate forced or compulsory labour in our workforce. We audited over 80 sites during 2017. Should any sites show high ratings of risk in any of the areas of the audit, they are re-audited within six months after the initial audit or sooner subject to the area of concern and the

extent of such. We had no sites which showed a high risk rating in relation to forced or compulsory labour during 2017.

We have maintained our membership, licensing and partnership with the Association of Labour Providers, the Gangmaster Licensing Authority and Sedex.

Due Diligence

We have continued to perform due diligence on the recruitment agencies through which we obtain our sub-contract labour and agency workers. We have done this by way of internal as well as externally supported due diligence screening and questionnaires. This exercise has resulted in a reduction in the number of recruitment agencies that we work with allowing us to have a greater level of transparency and partnership.

We require our key sub-contractors to meet the requirements set out in our general purchasing conditions, including compliance with all laws.

Future steps to prevent modern slavery in our supply chains:

We will continue to monitor the modern slavery risk by way of policy, risk assessment, training and due diligence.

Specifically, we will continue to deliver the training and awareness to new employees and employees who are newly promoted into management roles in order that employees involved in recruitment, procurement and management have an appropriately high level of understanding of the risk of modern slavery and human trafficking and that there is a general level of awareness across our business. We will also continue to promote general awareness across all our teams at every level in order that employees know how to raise a flag should they identify concerns or be subjected to modern slavery themselves.

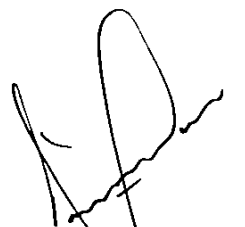
We will also continue to audit our sites and carry out due diligence on our labour agencies and labour sub-contractors which will assist in identifying areas of risk.

This statement was approved by the Boards of XPO Supply Chain UK Limited, XPO Transport Solutions Limited, XPO Maintenance UK Limited and XPO Bulk UK Limited.

Signed:



Gavin Williams
Director
XPO Supply Chain UK Limited



Dan Myers
Director
XPO Transport Solutions UK Limited
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