

DACHSER MODERN SLAVERY POLICY

Dachser UK- Integrity in Logistics

DACHSER Modern Slavery Policy

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our customers, contractors, employees and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our business partners will hold their own business partner to the same high standards.

1. Policy Statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We prohibit the use of worker-paid recruitment fees.

1.2 Also refer to DACHSER CODE OF CONDUCT: Human Rights and Environmental Protection

1.3 **ILO Indicators We encourage you to look out for signs of Modern slavery by using ILO Indicators of Forced Labour, which include but are not limited to; Abuse of vulnerability, Deception Restriction of movement, Isolation, Physical and sexual violence, Intimidation and threats, Retention of identity documents, withholding of wages, Debt bondage, Abusive working and living conditions, Excessive overtime.**

2. About this policy

2.1 The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for the policy

3.1 The Legal and Compliance Team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3.3 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Legal and Compliance Team.

4. Your responsibilities and how to raise a concern

4.1 You and your business partners must ensure that you read, understand and comply with this policy. It is your responsibility to ensure that you have passed this policy onto those service providers who participate in the service that is provided to us.

4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You and those who form part of your supply chain are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any business partners tier at the earliest possible stage.

4.4 If anyone in your organisation or your business partners believe or suspect that a breach of this policy has occurred or that it may occur, you must report it to your manager or contact your DACHSER Representative for your respective region as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our business partners to help them address coercive or exploitative work practices in their own business and supply chains.

4.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or DACHSER Representative.

4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your DACHSER Representative for your respective region immediately.

5. Communication

5.1 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all business partners, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

6. Breaches of this policy

6.1 You should have measures in place to deal with the issue of modern slavery within your organisation supply chain, work practices and recruitment process.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

Declaration

6.3 You agree to comply with the requirements contained herewith. You will ensure that your employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners are aware of the requirements. You will take all necessary steps to ensure that Modern slavery does not exist in our supply chain.

6.4 You undertake, warrants and represents that neither you nor any of its officers, employees, agents or subcontractors has:

- committed an offence under the Modern Slavery Act 2015 (a “MSA Offence”); or
- been notified that it is subject to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015;
- is aware if any circumstances within its supply chain that could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015;

6.5 You shall comply with the Modern Slavery Act 2015

6.6 You shall notify DACHSER immediately in writing if it becomes aware or has reason to believe that it, or any of its officers, employees, agents or subcontractors have breached or potentially breached any of Business partners’ obligations under Condition.

6.7 Any breach of Condition by the Business partners shall be deemed a material breach of the Contract and shall entitle DACHSER to terminate the Contract.

6.8 The Business partners shall implement due diligence procedures for its subcontractors and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains.

6.9 If required by DACHSER, the Business partners shall prepare and deliver to DACHSER, a slavery and human trafficking report setting out the steps it has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.