DX POLICY STATEMENT ON MODERN SLAVERY 2023

This statement by DX (Group) plc is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 which requires businesses to disclose publicly the steps they are taking to tackle slavery, servitude and human trafficking (together known as modern slavery).



The statement sets out the Group's actions and commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

At DX we respect human rights and do not tolerate any form of modern slavery or bullying. We recognise that every supply chain is at risk of modern slavery and it is our responsibility to ensure we understand these risks and work in partnership with our suppliers to mitigate them.

DX – our business

DX is a leading provider of delivery solutions including parcel freight, secure courier, 2-Man and logistics services, operating in the UK and Ireland with over 5,000 employees at over 100 sites – mainly office or warehouse facilities. Our supply chain is varied and includes master sub-contractors who provide a service to DX, where we pay particular attention to the risk of modern slavery.

Our customers also take their responsibilities very seriously and require DX to meet their supplier codes of conduct and to confirm DX is meeting its obligations under the legislation.

Listed on the Alternative Investment Market of the London Stock Exchange, DX is committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

Our approach

DX maintains specific policies in relation to colleagues employment to prevent slavery and human trafficking, and to ensure that any risks are mitigated. For example, we have introduced a strict approval policy for any colleagues requesting wage/salary payments be made to bank accounts in third party names. Also all DX colleagues go through vetting and background checks via the **Disclosure and Barring Service (DBS).**

DBS (formerly CRB) CHECKED
Disclosure and Barring Service

This ensures we are aware of any criminal convictions relating to potential colleagues. This process gives DX confidence that our colleagues are not involved in activity relating to modern slavery, and are legally entitled to work for DX.

These policies are published on the company's intranet site, available on the website, and incorporated into the contractual procurement process when engaging with third-party suppliers.

Our e-learning training platform which provides further access to the Group's policies and procedures, allows for updates and news items, and provides appropriate training on matters including modern slavery.

Our independent whistleblowing policy and procedures, managed by EQS enables colleagues and suppliers to report any concerns about modern slavery and any other human rights violations.

There have been no reports of any modern slavery issues at DX raised within the business, or via the whistleblowing service, in the period covered by this statement. Many of our premises are classed as secure facilities, due to the value of items being delivered. CCTV, and GPS vehicle tracking, is used to ensure the safety and security of our Colleagues, which allows us to monitor for evidence of modern slavery.

Supply Chain standards

The DX Supplier Code of Conduct (the "Code") was first introduced. in 2016. The Code will be revised in the current financial year

We also require our labour providers to sign up to a commitment to Minimum Standards, requiring, among other things, compliance with the ETI (Ethical Trading Initiative) Base Code.

Our Code prohibits all forms of slavery, servitude, forced and compulsory labour and human trafficking. In addition, we require suppliers to treat their own employees and suppliers with respect and dignity, and prevent discrimination whilst adhering to the relevant employment legislation.

The Code reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chain.

As part of the Code and the Minimum Standard for labour Providers, we expect our suppliers to:

- ensure employees are engaged under fair terms with reasonable pay and all staff, including agency workers, have a written contract of employment, with all wages paid direct to the individual worker;
- prohibit any type of harassment including physical or verbal abuse, threats and bullying;
- ensure working hours of employees comply with national laws and industry specific regulations;
- ensure no person is employed who is below the minimum legal age for employment and ensure no person under 18 years of age is employed for any hazardous work
- prohibit forced, bonded or compulsory labour so that employees are free to leave their employment after reasonable notice. This includes no worker requirement to lodge deposits or identity papers, and that no person has had to pay any direct or indirect fees to obtain work;
- allow all employees freedom to join, or not to join, an employee representative body; and ensure health and safety, and environmental risks are identified, minimised and managed.

In addition, we expect our suppliers of labour to meet the Minimum Standard for Labour Providers to tackle Modern Slavery. With the work undertaken over the past year our labour providers have now confirmed they meet these minimum standards.

Audit

We are carrying out checks on existing and any new suppliers. We also reserve the right to audit all of our suppliers and to terminate our relationship with a supplier if issues of non-compliance with our policies are discovered and/or non-compliance is not addressed in a timely manner.

Training

An updated Modern Slavery training module was introduced during the year. The Directors have been fully briefed on the risks of modern slavery and DX continues to conduct internal training on the company's approach to compliance with the Modern Slavery Act. Managers within DX are trained about slavery and human trafficking and ensure all direct reports are updated. This training is also being delivered to the procurement team, senior management and general managers in our service centres. Our e-learning platform has been used to deliver awareness training on issues of modern slavery and other topics of concern and/or interest.

Our internal policy document informs all colleagues about the Modern Slavery Act, the warning signs to look out for and how to raise any concerns either internally or by using the **Modern Slavery helpline 0800 012 1700** www.modernslaveryhelpline.org/ or Whistleblowing via EQS on 0044 3332423759 www.dxg.integrityline.com/frontpage.

A poster campaign at all sites, highlights the signs of modern slavery of which we all ought to be aware, and with a reminder of how to report concerns.

Future Priorities

At DX, we put our colleagues and suppliers at the core of our success. We will continue to train our colleagues to be alert to the risk of Modern Slavery and raise awareness of the warning signs. We also continue to work closely with our labour providers to assure ourselves that they are committed to and maintain the minimum supply chain standards and will consider what else might be done as part of our review of the Code.

Read our policies

All of our current policies are available to read at:

https://www.dxdelivery.com/corporate-social-responsibility

Annual Transparency Statement on Modern Slavery
for the period ended 1 July 2023

"This Statement has been approved by the Board of DX, and the Board remains fully committed to our obligations to identify and address risks around slavery, servitude, forced labour and human trafficking.

As we focus on future growth, our approach to modern slavery is also developing in line with the risks we face. We have again updated our risk assessment and labour supply remains the key risk area. In this area we seek adherence to the Minimum Standard for Labour Providers.

That sits alongside our Supplier Code of Conduct in helping DX meet its own obligations to our customers. Our assessment is that the risk of modern slavery in our supply chain is relatively low but we remain vigilant. I note again that no issues of modern slavery were raised within the business or reported on our whistleblowing hotline during the year.

Our plan for the coming year is to continue engagement with our customers, colleagues and supply chain through our e-learning training platform. We are also developing a more formal annual review process with our labour providers."

Mark Hammond, DX (Group) plc Chairman
20 December 2023

