

# DX POLICY STATEMENT ON MODERN SLAVERY 2020



This statement 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).



It sets out the steps taken by DX (Group) plc (DX or the Company) on its own behalf and cascaded to DX group companies including DX Network Services Limited to ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its 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 an independent provider of delivery solutions including parcel, freight, secure, courier and logistics services, operating in the UK and Ireland with over 3,600 employees at over 70 sites – mainly office or warehouse facilities. Our supply chain is varied and extends to self-employed drivers, and 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 staff employment to prevent slavery and human trafficking, and to ensure that any risks are mitigated. For example, all

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This ensures we are aware of any criminal convictions relating to potential staff, as well as checking references, credit and home addresses for at least the past five years. This process gives DX confidence that our staff 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, referred to in the staff handbook, available on the website, and incorporated into the contractual procurement process when engaging with third-party suppliers.

This year we also launched a new e-learning training platform which will provide further access to the Group's policies and procedures, allow for updates and news items, and provide appropriate training on matters including modern slavery.

What's more, our independent whistleblowing policy and procedures, managed through Navex Global enable staff



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 Navex Global whistleblowing phone line, 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, or GPS vehicle tracking, is used to ensure the safety and security of our staff, which allows us to monitor for evidence of modern slavery, or other inappropriate behaviour should it be necessary.

## Supply Chain standards

The DX Supplier Code of Conduct (the “Code”) was introduced for new suppliers in 2016 and we continue to roll this out to both new and existing suppliers (as agreements expire or are renewed).

We also require our labour providers to sign up to a commitment to Minimum Standards, requiring, among other things, compliance with the ETI 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 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

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. As mentioned above, we also now have a new e-learning platform which will be used to delivery training on issues of modern slavery and other topics of concern and/or interest.

Our internal policy document informs all employees 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** <https://www.modernslaveryhelpline.org/> or [Whistleblowing via Expolink](#).

## Future Priorities

At DX, we put our staff and suppliers at the core of our success. We will continue to train our staff to be alert to the risk of Modern Slavery. Despite the challenges this year as a result of the COVID-19 pandemic 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.



## Read our policies

### Supplier Code of Conduct

<https://www.dxdelivery.com/media/282570/dx-supplier-code-of-conduct.pdf>

### Corporate Social Responsibility Statement (CSR)

<https://www.dxdelivery.com/media/338463/website-csr.pdf>

### Anti-bribery Policy

<https://www.dxdelivery.com/media/171844/dx-group-plc-anti-corruption-and-bribery-policy.pdf>

### DX Gender Pay Gap Report

<https://www.dxdelivery.com/media/338352/dx-gender-pay-gap-report.pdf>

DX Gender Pay Gap Report This is the latest available Report. In 2020 the Government announced a suspension of enforcement measures on gender pay gap reporting for 2019/20 “in view of the unprecedented pressures businesses are currently experiencing” We shall publish a report in 2021 covering 2020.

## Annual Transparency Statement on Modern Slavery for the period ended 27 June 2020

*“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 the first stage of our turnaround of the business has been completed and we focus on future growth, our approach to modern slavery is, despite the impact of the COVID-19 pandemic, also developing and maturing in line with the risks we face. We have 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 to continue engagement with our customers, employees and supply chain and to progress with our new e-learning training platform in this important area. We also plan to develop a more formal annual review process with our labour providers.”*

**Ron Series, DX (Group) plc Chairman**

16 September 2020

