

DX POLICY STATEMENT ON MODERN SLAVERY



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, forced labour and human trafficking (together known as modern slavery).



It sets out the steps taken by DX (Group) plc (DX or the Company) 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 3,300 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.

Many of our key customers scrutinize our Modern Slavery documentation including **Kingfisher (B&Q)**, **IKEA**, **HMPO** and **Ministry of Justice**.

Listed on 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 – business turnaround

DX appointed a new board in October 2017 and a business turnaround strategy is under way, following a comprehensive review of operations, including the supply chain and recruitment process.

DX has specific policies in relation to staff employment to prevent slavery and human trafficking, and to ensure that any risks are mitigated against. For example, all DX staff go through vetting and background checks via the **Disclosure and Barring Service (DBS)**.



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 able to work for DX.

These policies are available on the company's intranet site, in the staff handbook, on the corporate website, and in the contractual procurement process when engaging with third-party supplies.

What's more, our independent whistleblowing policy and procedures, managed through [Expolink](#), enables 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, via Expolink, up to the period covered by this statement.

Many of our premises are classed as secure facilities, due to the value of items being delivered. We regularly audit staff movements via CCTV, or GPS vehicle tracking, which allows us to monitor for evidence of modern slavery, or other inappropriate behavior.

Supply Chain standards

The DX Supplier Code of Conduct was introduced for new suppliers in April 2016 and this to ensure now been extended to existing suppliers.

This prohibits all forms of slavery, servitude, forced and compulsory labour and human trafficking. In addition, we ensure suppliers treat employees with respect and dignity and prevent discrimination, while adhering to the relevant employment legislation.

The Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chain.

We expect our suppliers to meet the Minimum Standard for Labour Providers to tackle Modern Slavery, which include:

- ensuring 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. A standard working week should not exceed 48 hours, or with overtime, 60 hours
- 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, or 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
- ensure compliance with national legal and regulatory requirements and have a modern slavery policy with a clear escalation process
- To inform DX of all sub-contracting or labour sourcing agents, for which these minimum standards must apply.
- Ensure staff are trained to spot the signs of labour exploitation and human trafficking, along with regular discussion and welfare checks with workers

To date, around 90% of our labour providers have confirmed they meet these minimum standards.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance 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.

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 0121700** <https://www.modernslaveryhelpline.org/> or [Whistleblowing via Expolink](#).

Future Priorities

As the Turnaround Plan continues within 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. We are also working closely with the remaining 10% of our labour providers to seek confirmation that they are working towards these 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>

Annual Transparency Statement on Modern Slavery for the Year ended June 2018

“We remain fully committed to our obligations to identify and address risks around slavery, servitude, forced labour and human trafficking. We recognise that our approaches need to mature and we have reviewed all our policies and procedures during the year.

The new management team has reviewed all aspects of the business during the past year in developing the turnaround plan, to ensure our approach to modern slavery is suitable to the risks we face.

We have completed a risk assessment and identified our labour suppliers as being a risk area. We have instigated minimum standards for our suppliers to adhere to, in helping DX meet its own obligations to our customers.

Our plan is to increase and improve due diligence to ensure our suppliers are meeting and can evidence compliance with these minimum standards. This will build on the existing protections of ensuring that the risks within our own business are addressed via the vetting of employees, the whistleblowing process and training.

I note that no issues of modern slavery were reported on our whistleblowing hotline during the year. We will also be refreshing the training in this important area, and raising awareness of issues over the coming year.”

Ron Series, DX (Group) plc Chairman

November 2018

