



DHL 2023

# MODERN SLAVERY POLICY STATEMENT





## REPORTING ENTITIES

This statement is made by DHL Supply Chain (Australia) Pty Ltd ACN 071 798 617, DHL Express (Australia) Pty Ltd ACN 001 112 929, DHL Global Forwarding (Australia) Pty Ltd ACN 002 636 124 and Deutsche Post Global Mail (Australia) Pty Ltd ACN 093 118 346 (together referred to as “DHL AU”). **DHL AU is a part of the Deutsche Post DHL Group** (“the DHL Group”).

The DHL Group is the world’s leading logistics company with approximately 600,000 employees operating in more than 220 countries and territories. The Group connects people and markets and is an enabler of global trade. It aspires to be the first choice for customers, employees and investors worldwide. To this end, the DHL Group is focusing on growth in its profitable core logistics businesses and accelerating the digital transformation in all business divisions. The Group contributes to the world through its commitments to clean operations for climate protection, being a great company to work for all and a highly trusted company.

DHL AU provides a range of supply chain services to its customers, including value-add logistic solutions, e-commerce fulfilment, reverse logistics, procurement, co-packaging, distribution, managed transportation and customs brokerage.

As part of the Group, DHL AU is fully aligned with all Group policies and practices in relation to responsible business practice and human rights standards, including those in relation to forced labour, or modern slavery. The Group’s Human Rights Policy statement complements the DHL Group’s Code of Conduct, the basis and benchmark for all guidelines and regulations that ensure responsible and ethically irreproachable conduct within the Group. The policy statement defines its minimum standards for working conditions and human rights in the Group’s employee and partner relations. For our suppliers, the DHL Group’s Supplier Code of Conduct sets out the required Human Rights minimum standards. All policies are regularly reviewed to ensure they are relevant, up to date and supplemented with new topics where necessary.

The DHL AU entities use the same policies and processes and operate in broadly the same sector. DHL AU has therefore provided a single, consolidated description of actions to address modern slavery risks.

This statement is made with respect to the 2022 calendar year. This Modern Slavery Policy Statement was approved by the board of DHL Supply Chain (Australia) Pty Ltd on 22 June 2023, by the board of DHL Express (Australia) Pty Ltd on 22 June 2023 by the board of DHL Global Forwarding (Australia) Pty Limited on 21 June 2023 and by the board of Deutsche Post Global Mail (Australia) Pty Limited on 22 June 2023.

# DHL AU STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## STRUCTURE

**Each of the DHL AU entities are companies incorporated in Australia. The ultimate holding company of the DHL AU companies is Deutsche Post AG.** Deutsche Post AG is a company incorporated in Germany. DHL Supply Chain (Australia) Pty Ltd's registered address is Rhodes Corporate Park, Building C Level 4, 1 Homebush Bay Drive, Rhodes NSW 2138, DHL Express (Australia) Pty Limited's registered office is at Level 10, 68 Pitt Street, Sydney NSW 2000, DHL Global Forwarding (Australia) Pty Limited registered office is at 96-106 Link Road, Melbourne Airport, VIC 3045 and Deutsche Post Global Mail (Australia) Pty Limited's registered office is at Building 1, Millennium Court, Unit 1, 33-41 Military Road, Matraville, NSW 2036.

DHL AU employs 6,331 workers at 117 locations around Australia.

In August 2022, DHL Supply Chain acquired 100% of the Glen Cameron Group, an Australian logistics company specialising in road freight and contract logistics. We are taking time to understand how the Glen Cameron Group operates, including the risks of modern slavery practices in its operations and supply chains and the actions it takes to assess and address modern slavery risks. The process of integrating the Glen Cameron Group's compliance standards, systems and processes into our business is currently ongoing, however we expect this process to be completed in 2024 with respect to the implementation of key Group policies and practices as it relates to modern slavery. For the purposes of this statement, references to DHL AU do not include the Glen Cameron Group.



**6,331** workers  
**117** locations

## OPERATIONS

### DHL Supply Chain

As the world leader in the contract logistics market, our around 185,000 employees worldwide help us support more than 1,400 customers in managing their supply chains in over 50 countries. This is our core business and includes warehousing and transport as well as value-added services such as e-fulfilment, Lead Logistics Partner (LLP), Real Estate Solutions, Service Logistics, transport and packaging solutions for strategic industrial sectors. We also develop innovative and sustainable solutions. In Australia, DHL Supply Chain operates 93 sites and employs 4,291 workers.

### DHL Express

In the Express division, we transport urgent documents and goods reliably and on time from door to door. Our global network spans more than 220 countries and territories in which some 111,000 employees worldwide provide services to around 2.7 million customers. In Australia, DHL Express operates 18 sites and employs 1,437 workers.

### DHL Global Forwarding (Global Shipping)

Our air, ocean and overland freight forwarding services include standardised transports as well as multimodal and sector-specific solutions, together with customised industrial projects, which our around 43,000 employees in over 150 countries deliver for more than 175,000 customers. Our business is based upon brokering transport services between customers and freight carriers. The global reach of our network allows us to offer efficient routing and multimodal transport options. Compared with the Group's other divisions, our operating business model is asset-light. In Australia, DHL Global Forwarding operates 6 sites and employs 560 workers. DHL Global Forwarding in Australia has a matrix structure based upon functions and geography. The key functional activities include Airfreight, Ocean Freight, Customs Brokerage, Sales, Finance, IT, HR. The geographic structure is based upon branches in Brisbane, Sydney, Melbourne, Hobart, Adelaide and Perth. DHL Global Forwarding's operations are conducted in each of these locations.

**Deutsche Post Global Mail (Australia) Pty Ltd**, trading as DHL eCommerce Solutions is part of the DHL Group. DHL eCommerce Solutions Australia offers cross-border, economy parcel delivery and returns solutions to online retailers. Specializing in tailor-made, affordable solutions, offering a choice of postal and commercial products to meet the needs of customers in the e-commerce sector. In Australia, Deutsche Post Global Mail employs 43 workers.

**69%** 

**Transportation services**  
Road, air, rail and sea freight

 **1%**

**Financial services and insurance**

**4%** 

**Real estate**

 **1%**

**Telco, IT hardware and software**



**SUPPLY CHAIN**

DHL AU acquires a wide range of goods and services, including:

**9%** 

**Temporary labour hire and contract workers**

 **3%**

**Packaging and print materials**

**3%** 

**Facilities management services**  
including catering, waste disposal, cleaning, security and pest control

 **4%**

**Material handling equipment and plant deployed in warehouses and logistics centres**



# RISKS OF MODERN SLAVERY IN DHL AU OPERATIONS AND SUPPLY CHAINS<sup>1</sup>

DHL AU has not undergone significant changes since its previous modern slavery statement, and accordingly the risks and levels of risk of modern slavery in DHL AU's own operations remains low. DHL AU has a robust suite of resources, policies and procedures to monitor and manage human rights issues in their operations. Employees participate in online compliance programmes about the Code of Conduct Policy and its application to everyday scenarios at work and when doing business. This learning also forms an integral part of the employee induction process.

DHL also assesses the risk of modern slavery in its first tier suppliers as generally low. The majority of DHL AU's first tier suppliers are based in Australia or in other countries where the risk of modern slavery is low or very low.

A key risk area in the first tier supply chain is in facilities management, including building services, cleaning, and security and maintenance services. These areas involve a relatively high risk of modern slavery associated with low skilled work, migrant workforces, opaque contracting arrangements and poor worker understanding of Australian workplace law and their rights.

Another risk area is temporary labour hire. To help meet variable business demands, third party labour arrangements are operationally beneficial. However, using a third party labour hire company to provide workers introduces complexity into DHL AU's supply chain and increases modern slavery risk by reducing our visibility over recruitment and retention practices.

Potential risk areas in DHL AU's extended supply chain include:

- **Electronics and IT hardware:** The electronics industry is recognised as a high-risk industry for modern slavery and more general human rights risks. Manufacturing can occur in locations with minimal regulation and oversight. There is also a risk that products are manufactured from raw materials, where production involved workers being subjected to modern slavery.
- **Uniforms and apparel:** apparel is an industry of increasing focus with manufacturing most often occurring in high-risk countries. Forced labour, unpaid wages and unsafe working conditions have been reported in the apparel industry in South East Asia.

***“DHL AU has a robust suite of resources, policies and procedures to monitor and manage human rights issues in their operations.”***



<sup>1</sup> We are currently in the process of assessing the risks of modern slavery practices in the operations and supply chains of the Glen Cameron Group. These will be detailed in a future statement once the integration process is complete.

# ACTIONS TAKEN BY DHL AU TO ASSESS AND ADDRESS RISKS<sup>2</sup>

## 1. DHL AU INTERNAL OPERATIONS

### Policies and Governance

As an employer, DHL AU as part of DHL Group leads by example. Respecting Human Rights is a core value of the DHL Group and is committed to respecting all internationally recognised human rights as relevant to its operations. Its Human Rights Policy Statement anchors minimum standards for fair working conditions and human rights in employee relations throughout Australia. The Group bases its human rights policy statement on:

- The Ten principles of the UN Global Compact;
- The Universal Declaration of Human Rights;
- The International Labour Organization's Declaration on the four Fundamental Principles and Rights at Work;
- The OECD Guidelines for Multinational Enterprises;
- The UN Guiding Principles on Business and Human Rights; and
- The UN Sustainable Development Goals.

Accountability for the implementation of this Human Rights Policy Statement is overseen by the Chief Executive Officers of the respective businesses in Australia. **This ensures that every member of the DHL AU business is clear about the responsibility to respect human rights and its day-to-day implementation.**

### Employee Code of Conduct

Our Employee Code of Conduct reflects DHL AU's corporate values "Respect & Results". The rules and standards outlined in the Code serve as an "ethical compass" that guides all employees worldwide in their day-to-day work. There is no alternative to conducting our business in a responsible, fair and ethically irreproachable way.

The Group Board of Management endorses the values outlined in the DHL Group Code of Conduct and expects all employees, executives and managers to be role models in their daily work and to contribute to a corporate culture characterized by respect. Refresher Code of Conduct training is provided to employees every two years and new employees are enrolled to complete Code of Conduct training within three months of their commencement. The Code of Conduct is binding for all regions and business units of the DHL Group.

### Child Labour

We reject all forms of child labour. We do not employ children below the legal minimum age of employment in any country or local jurisdiction. We apply a minimum working age of 15 years, even where local legislation permits younger children to be employed. Employees under the age of 18 only perform work in accordance with legal requirements of their country of employment e.g. with regards to working hours and working condition and subject to any requirement regarding education or training.

### Forced Labour

We reject all forms of forced and compulsory labour. All labour must be voluntary. We do not tolerate any forms of forced labour including bonded labour, indentured labour, military labour, modern forms of slavery and any form of human trafficking.

### Freedom of Association and Collective Bargaining

We respect our employees' right to join or not to join a trade union or employee representation of their choice, free from threat or intimidation. We recognise and respect the right to collective bargaining in accordance with applicable local law. Employees who act as representatives are neither disadvantaged nor favoured in any way. modern forms of slavery and any form of human trafficking.

### Working conditions



#### Remuneration and benefits

We compensate our employees relative to local industry and labour market and minimum wage legislation and in accordance with terms of Enterprise Agreements, where applicable. We pay workers in a timely manner and clearly convey the basis on which workers are being paid.



#### Working hours

We comply with all applicable local laws and Enterprise Agreement requirements (where applicable) regarding working hours including overtime, rest breaks and paid leave.

<sup>2</sup> We are currently in the process of understanding the actions taken by the Glen Cameron Group to assess and address risks of modern slavery. These will be detailed in a future statement once the integration process is complete.



**Health & Safety**

The safety, health and well-being of our employees is of utmost importance. In adherence to the Group’s Occupational Health and Safety policy, statutory regulations and industry standards, we provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent work-related accidents, injuries and illnesses.

**Diversity and Inclusion**

We promote an inclusive work environment that values the diversity of our employees as confirmed in our Diversity and Inclusion Statement. We are committed to equal employment opportunity and reject any forms of discrimination or harassment based on any protected attribute including but not limited to gender, ethnic origin, nationality, social origin, religion, age, disability, sexual orientation and identity or any other characteristics protected by applicable law. The basis for employee selection and promotion at the DHL Group is qualification, performance, skills and experience.

**Data Privacy**

We respect the privacy of all individuals and the confidentiality of any personal data we hold about them. The Group’s Data Privacy Policy provides appropriate safeguards for transmission of personal data belonging to its employees, customers and suppliers within the Group. The Group’s Data Protection Management safeguards compliance with the respective data protection regulations and legislation.

***“We promote an inclusive work environment that values the diversity of our employees...”***

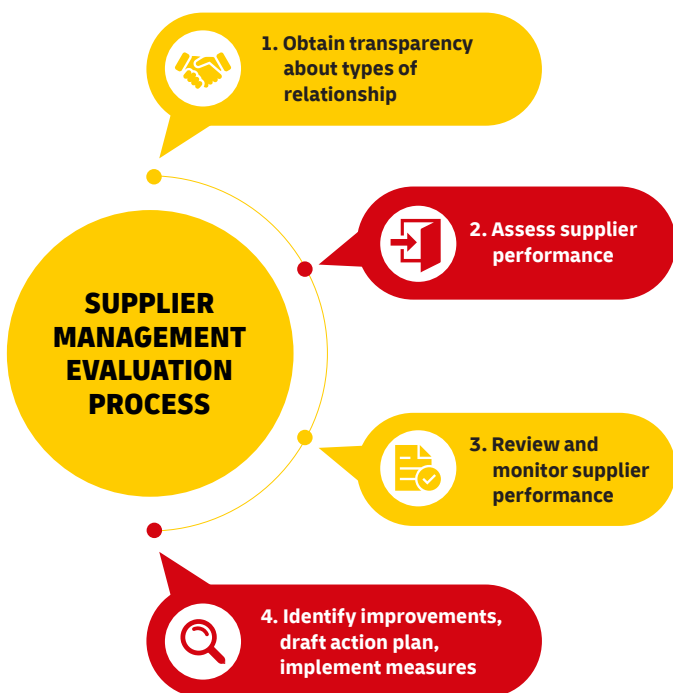




## 2. DHL AU SUPPLIERS

Our commitment to respect human rights is reflected in DHL AU’s policies e.g., Code of Conduct, Supplier Code of Conduct and procedures. To comply with international Human Rights standards, national laws and DHL AU’s policies we undertake appropriate Human Rights due diligence to identify, assess and address potential and actual adverse human rights impacts in our business activities and supply chain.

### DHL Supplier Management Process Overview

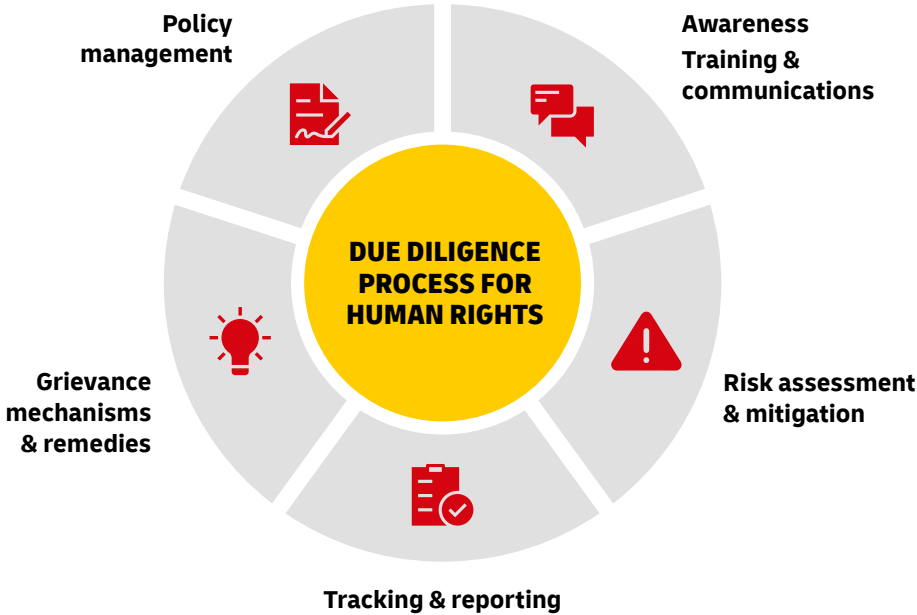


### Supplier Selection

Corporate Procurement selects suppliers that meet our ethical, social and environmental standards. Supplier selection is based on a standardised assessment process which also takes aspects such as diversity and respect for human rights into account, as well as external criteria such as those from Transparency International (Corruption Perceptions Index).

Procurement employees are regularly trained to identify potential supplier-related risks early on. We convey our expectations to our suppliers and subcontractors via our Supplier Portal [Deutsche Post DHL Group | Supplier Portal \(dpdhl.com\)](https://dpdhl.com) and introduce our selection processes. Suppliers can also use our portal to familiarise themselves with our Supplier Code of Conduct, which we make available in numerous languages along with the corresponding training module. From there, they can also access our professional compliance whistle-blower system which they can use to report potential violations of the Code or statutory provisions as well as cybersecurity incidents.





**Suppliers are selected after a process where the supplier’s capability is assessed to ensure that they are meeting the business requirements,** as well as their economic significance and risk impact in the supply chain can be identified. This is embedded within the procurement sourcing process.

**Supplier Code of Conduct**

We expect all of our suppliers, including subcontractors, i.e. all companies who do business with any company or division of DHL AU, to adhere to the same high et mitigation hical standards as our internal operations.

For this purpose, the DHL Group has produced a Supplier Code of Conduct (SCoC), which sets the minimum standards for doing business with any Group company or Business Unit. For more detailed information on the Supplier Code of Conduct, please click on the following link: [Deutsche Post DHL Group | Supplier Code of Conduct \(dpdhl.com\)](https://www.dpdhl.com)

Suppliers can use the interactive training module on the Supplier Code of Conduct in advance to learn about the requested requirements. DHL AU ensures that our suppliers and other third parties are well aware and bound by these standards and take their responsibility towards employees, society, the environment and governance standards seriously. DHL AU are required to only buy products and services from suppliers and subcontractors that have accepted and signed our Supplier Code of Conduct (with the exception of small ad hoc purchases).

## Contents of the Supplier Code of Conduct



### Child Labor

No employment of children under the legal age of 15



### Compensation & working hours

Local laws, mandatory industry standards regarding minimum wages, working hours



### Freedom of association/ collective bargaining

Employees are free to decide whether to join a union or employee representative body



### Health & Safety

Ensure compliance with applicable occupational health and safety regulations



### Diversity & Inclusion

Encourage diversity and inclusion in the workplace



### Environment

Ensure compliance with all applicable laws, regulations and standards



### Forced Labor

No forced, bonded, compulsory labor or modern forms of slavery



### Data Protection

Adherence to applicable data protection laws and regulations



### Business Continuity

Preparations for business disruptions of all kinds must have been made



### Bribery

Comply with applicable national and international laws and regulations



### Continuous Improvement

Proactively exchange innovative ideas



### Conflict Minerals

Comply with all applicable laws

Further to this, the DHL Group has a Sustainability Roadmap, where the Group pursues the aspiration to be a highly trusted company in our industry by building sustainable and resilient supplier relations based on our Supplier Code of Conduct. For further information on the Sustainability Roadmap, please click on the following link: [Deutsche Post DHL Group | Sustainability \(dpdhl.com\)](https://www.dpdhl.com/sustainability) and download the Sustainability Roadmap Presentation.

**Supplier Risk Management Tool – Shield**

In 2022, the DHL Group introduced a new Supplier Risk Management Tool called Shield. This tool serves as the single point of access for all risk management activities for suppliers. Assessments scores stored in Shield include Due Diligence Questionnaire (DDQ), External Supplier Evaluations including EcoVadis and the ICTI Ethical Toy Program.

**Shield Scoring Index**

Shield presents all available risk assessments of a supplier according to a consistent logic. Suppliers who score between 0 and 25 will be classified as high-risk suppliers and a Corrective Action Plan (CAP) will need to be formulated and agreed between all stakeholders. The expectation is that the supplier will complete this in an agreed timeframe and then undertake a new Assessment. Should the supplier not engage or complete the CAP to a satisfactory level, the supplier may be off-boarded. For those Suppliers who scored between 26 to 49 will be classified as medium-risk suppliers and will need to implement their own CAP and be reassessed in 12 months. Suppliers who scored 50 or above will be classified as low-risk suppliers and will have to be reassessed in 36 months.

SUPPLIER SCORE	ACTION
<b>50 - 100</b>	Assess every 2 years
<b>26 - 49</b>	Annual Assessment & Priority Action in Improvement Plan
<b>0 - 25</b>	Reassessment/Corrective Action Plan
	<i>Consider phase out if failure</i>

**Supplier Due Diligence Questionnaire (DDQ)**

A “Supplier Due Diligence” policy (establishing minimum criteria for screening, process and a due diligence Questionnaire) is embedded in the Corporate Procurement Policy. This procedure incorporates assessments on our standards in the areas of Human Rights and Fair Labour Practices as well as Health & Safety, Data Protection, Bribery and Corruption, Environment, and Business Continuity Planning, with standards from our Supplier Code of Conduct.

The engagement of suppliers requires full compliance with internal company policies, particularly with procurement policies. In addition, before entering into a new business relationship with a supplier, the below criteria of the Third Party Screening Process need to be assessed and applied.

While the Third Party Screening is generally recommended for evaluating all suppliers, it is obligatory in all cases where the supplier provides temporary labour services or 2 of the following 3 criteria are met:

- The supplier provides an important element (i.e. if the annual cash-transaction with the proposed supplier exceeds or is expected to exceed € 2.5 million or local currency equivalent) of DHL AU’s service and for Suppliers providing products/ services to country entities with an annual spend of at least 250 k € being part of grouped companies exceeding 2,5m € annual spend
- The relationship will be established and / or the services will be provided in a country with a Transparency International Corruption Perceptions Index score ≤ 45 (based on Transparency International’s survey);
- The Third Party will be licensed to use any logo of the DHL Group and/or products / services having a high-risk exposure to violation of Health & Safety and Human Relation related aspects (applies for suppliers in Transportation FTL/LTL, Promotional items, Uniforms, Protective Clothing, Security Services, Cleaning / Catering Services)

**The Third Party Screening is to be initiated by approaching the supplier with the Due Diligence Questionnaire.** The Shield Scoring Index is applied and the corresponding actions are taken because of the Supplier’s DDQ score.







### External Supplier Evaluations

To enable the highest possible quality and objectivity during the supplier evaluation process, DHL AU utilises external organisations to audit suppliers’ systems, processes and performance.

To mitigate the risk of unethical practices occurring in our supply chains, DHL AU uses EcoVadis and ICTI The Ethical Toy Program (IETP) to independently evaluate suppliers against a set of sustainability criteria. Depending on the category, all procurement-managed suppliers are now obligated to complete either one of the external evaluations within 6 months of signing a new or renewing a contract where the annual spend exceeds € 2.5 million and/or exceeds 100 transactions per annum. The Shield Scoring Index is also captured, and the corresponding actions are taken because of the Supplier’s EcoVadis or IETP score.

The objective of the EcoVadis Corporate Social Responsibility (CSR) rating methodology is to measure the quality of a company’s CSR management system through its policies, actions and results. The EcoVadis assessment is based on 21 CSR Criteria in line with the UN Global Compact principles, which are anchored in 4 main themes, Environment, Labour and Human Rights, Ethics and Sustainable Procurement. EcoVadis requires companies to provide formal, recent, and credible documentation that serves as a reliable element of the company’s CSR management system, e.g., CSR reports, policies, procedures, certificates, training materials. A scorecard is then generated for DHL AU and the supplier against these key criteria along with strengths and areas for improvement.

### 21 CSR Criteria

 <b>ENVIRONMENT</b>	 <b>LABOR &amp; HUMAN RIGHTS</b>	 <b>ETHICS</b>	 <b>SUSTAINABLE PROCUREMENT</b>
<p><b>Operations</b></p> <ul style="list-style-type: none"> <li>■ Energy Consumption &amp; GHGs</li> <li>■ Water</li> <li>■ Biodiversity</li> <li>■ Local &amp; Accidental Pollution</li> <li>■ Materials, Chemicals &amp; Waste</li> </ul> <p><b>Products</b></p> <ul style="list-style-type: none"> <li>■ Product Use</li> <li>■ Product End-of-Life</li> <li>■ Customer Health &amp; Safety</li> <li>■ Environmental Services &amp; Advocacy</li> </ul>	<p><b>Human Resources</b></p> <ul style="list-style-type: none"> <li>■ Employee Health &amp; Safety</li> <li>■ Working Conditions</li> <li>■ Social Dialogue</li> <li>■ Career Management &amp; Training</li> </ul> <p><b>Human Rights</b></p> <ul style="list-style-type: none"> <li>■ Child Labor, Forced Labor &amp; Human Trafficking</li> <li>■ Diversity, Discrimination &amp; Harassment</li> <li>■ External Stakeholder Human Rights</li> </ul>	<ul style="list-style-type: none"> <li>■ Corruption</li> <li>■ Anticompetitive Practices</li> <li>■ Responsible Information Management</li> </ul>	<ul style="list-style-type: none"> <li>■ Supplier Environmental Practices</li> <li>■ Supplier Social Practices</li> </ul>



The ICTI Ethical Toy Program (IETP) was introduced in 2022 as an external audit partner for suppliers that operate in a factory or warehouse environment. For DHL, this includes suppliers in the packaging, promotion and apparel categories. ICTI Ethical Toy Program Certification requires factories to uphold certain standards to support the rights and well-being of factory workers. This Audit process undertaken ensures the auditors are provided full access to the factories and warehouses and can conduct worker interviews without interference. Amongst other aspects of the ICTI Ethical Toy Program audit, it seeks to ensure that there are no modern slavery conditions imposed on the workers, which includes but not limited to:

- no forced, involuntary or prison labour;
- no recruitment fees paid by the workers;
- all overtime is voluntary;
- ensure worker's wages are legal, fair and accurate;
- working hours are not excessive;
- workplace conditions are safe;
- worker health is safeguarded;
- protective equipment is provided; and;
- effective emergency procedures are in place.

The Ethical Toy Program Audit Checklist sets out detailed requirements that factories must meet to become Certified in this program. The Audit Checklist forms the backbone of the program, focussing on safe work environments, ensuring that workers are treated fairly with respect and dignity and that factories operate ethically. The Audit Checklist draws on conventions of the International Labour Organization (ILO) and other initiatives to promote fair labour practices and eliminate the risk of modern slavery practices.

### Modern Slavery Risk Assessment Questionnaire

DHL AU continues to conduct modern slavery risk assessment questionnaire with those suppliers that have not yet completed or are not required to produce a modern slavery statement. This survey is designed to understand our suppliers' approach to managing the risk of modern slavery within their business and in their own supply chains. This questionnaire was modified to include the Shield Scoring Index to more easily identify modern slavery risks present and develop an appropriate action plan to address them. The selection criteria of the suppliers who will be invited to complete the Modern Slavery questionnaire will be chosen from the identified high-risk categories below and have an annual spend of €2.5m, or in the instance that the spend is below this threshold, more than 100 transactions per year.

- Promotional Items
- Temporary Labour
- Office Supplies
- Corporate Wear
- Protective Clothing
- Building Maintenance & Repair
- Cleaning Services & Janitorial
- Security Services
- Output Based Services

### Customs, Export Controls and Sanctions

In the interest of responsible and ethically sound business practice, DHL AU always act in accordance with legal regulations and international conventions. We comply with the applicable laws and regulations on export controls, sanctions and customs clearance in all regions and countries. These relate not only to the movement of goods, but can also have an impact on matters such as financial transactions, the use of technology, procurement, or the hiring of personnel.





### 3. TRAINING & AWARENESS

We continue to communicate the Group's policies and raise awareness and knowledge amongst our employees and partners. We offer specific training on human rights related matters to our employees and partners.

### 4. STAKEHOLDER ENGAGEMENT

We recognize that we are part of the communities in which we operate in. We seek to engage with stakeholders e.g., our supply chain through dialogue to better understand and consider their views and expectations regarding human rights and modern slavery as described in our Stakeholder Engagement Guideline.

### 5. REMEDY AND GRIEVANCE MECHANISM

If it is determined that there is a risk of adverse human rights impact caused or contributed to by our business activities, we have a procedure in place to ensure the activity is assessed, changed, discontinued and/or remediated. We encourage our employees to address suspected violations of this modern slavery policy statement through the established accessible grievance or dispute resolution channels including local management, responsible Human Resources departments or the Compliance Hotline (BKMS Incident Reporting System). Our partners and third parties have the opportunity to access web forms at [www.dpdhl.com](http://www.dpdhl.com) to report potential violations of our Human Rights or Modern Slavery Policy Statement.

### 6. CONSEQUENCES OF BREACH

If infringements against our policies are reported, we will take appropriate measures for proper clarification of the circumstances of the breach. We will take corrective actions where appropriate. Consequences under civil and criminal law will depend on how and in what circumstances an individual has contravened our policy statements. Where a breach of legislation is proven in this regard, we also reserve the right to refer the matter to the relevant authorities for further action.

An allegation or violations of our Supplier Code of Conduct and/or standards, may prompt an investigation or inquiry. Should sufficient evidence come to light, we will take appropriate action as the circumstances may require. Any consequences applied will depend on the severity and in line with our internal Supplier Incident Management Process.

# EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

## Corporate Governance and Monitoring

We communicate and report on our human rights related commitments, activities and statements, consistent with modern slavery statement, as part of our Deutsche Post DHL Group's annual reporting. As part of our culture of continuous improvement, DHL AU regularly evaluates and reviews how best to improve and strengthen our approach to addressing human rights in our sphere of influence. The implementation of measures for respecting human rights in the workforce and in the supply chain have been monitored on a global scale by the new German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) Council since the beginning of 2023.

## Supplier Code of Conduct and Modern Slavery Risk Questionnaire

We use supplier spend covered by an accepted Supplier Code of Conduct to measure the successful implementation of our standards in the supply chain. We record progress via the central financial systems, report to management on a quarterly basis, and discuss developments. In the year under review, Australian supplier spend covered by an accepted Supplier Code of Conduct amounted to more than \$ 600 million.

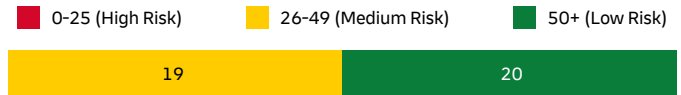
A further 15 Modern Slavery Questionnaires have been completed by Suppliers in 2022, with no adverse findings against the assessed suppliers.

## Internal and External Audits Completed

As part of DHL AU's efforts to appropriately document risk-based due diligence pertaining to the hiring and appropriate and regular oversight of suppliers, DHL AU conducted a further 19 Supplier Due Diligence Screenings in 2022 for suppliers across the DHL AU Group. These Due Diligence Screenings did not highlight any human rights or other risks or adverse findings for these suppliers. No escalations were required to the Regional Compliance or Procurement Governance team.

To support our robust and objective supplier evaluations, EcoVadis assessments were conducted for 39 suppliers over the last 12 months across the high-risk human rights categories of temporary labour, facilities management, transportation and network supplies. Of those assessments, 20 vendors were classified as Low Risk (50+), 19 as Medium Risk (26 – 49), with no vendors identified as High Risk.

### Overall Score



For those Medium Risk vendors, EcoVadis has provided correspondence outlining the corrective actions required, along with a timeline for resolution. Each supplier is re-assessed 12 months after notice to track improvements against the target actions.

## Effectiveness of the Compliance Hotline

Potential violations can be anonymously reported 24/7, via our professional compliance incident reporting system (whistle-blower hotline). The incident reporting system was made available to third parties during 2022. Reports are reviewed and investigated internally for potential violations as part of a standardised process. Information on relevant violations is collected and included in the regular compliance reports made to the DHL Group Board of Management and to the Supervisory Board's Finance and Audit Committee.

## Internal Awareness and Training Programs

In the interest of raising awareness of compliance amongst employees, a Group-wide campaign – Compliance Awareness Week - was carried out in 2022 and rounded out by measures tailored to the specific divisions and regions. The campaign was additionally supported by “tone from the top” statements from the members of the DHL Group Board of Management to emphasise to each employee the importance of compliance for the Group. To strengthen the internal dialogue, our workforce was made aware of and informed about compliance aspects on an ongoing basis by means of further communication measures and via the compliance channels. To further support this, employees are required to complete Code of Conduct and Human Rights training.

Through 2022, 456 DHL Express employees completed the Code of Conduct training, along with 212 employees completing the Human Rights e-learning module. In DHL Global Forwarding, 599 employees completed the Code of Conduct training, along with 43 employees in Deutsche Post Global Mail. 3 employees of DHL Global Forwarding and all eligible employees of Deutsche Post Global Mail completed the Human Rights e-learning module as well. 418 DHL Supply chain employees completed the Code of Conduct training, along with 84 employees completing the Human Rights e-learning module.



## THE PROCESS OF CONSULTATION WITH OTHER ENTITIES

DHL AU adopted a cross-functional approach to risk analysis, reporting and business input in the preparation of this Statement. This statement was prepared by the DHL AU Group procurement and legal team with each DHL AU entity involved in reviewing the Statement and contributing to its preparation by way of meetings and ongoing dialogue. The Directors of each DHL AU entity then reviewed and approved the Statement.






# APPROVAL AND SIGNATURE

The Directors of DHL Supply Chain (Australia) Pty Ltd, DHL Express (Australia) Pty Ltd, DHL Global Forwarding (Australia) Pty Ltd and Deutsche Post Global Mail (Australia) Pty Ltd reviewed and approved the Statement in their capacity as principal governing body of the respective DHL AU entity on 22 June 2023, 22 June 2023, 21 June 2023 and 22 June 2023 respectively.

## SIGNED BY

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Signature of **Director of DHL Supply Chain (Australia) Pty Limited**

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Signature of **Director of DHL Express (Australia) Pty Limited**

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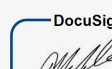
Signature of **Director of DHL Global Forwarding (Australia) Pty Limited**

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Signature of **Director of Deutsche Post Global Mail (Australia) Pty Limited**

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