

## **TNT UK LIMITED & TNT EXPRESS ICS LIMITED**

### **MODERN SLAVERY ACT 2015 COMPLIANCE STATEMENT FOR 2017**

TNT UK Limited (“TNT UK”) recognises that it has a responsibility to be alert to the risks of slavery, servitude, forced and compulsory labour and human trafficking (“modern slavery”). TNT UK is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

TNT UK is fully supportive of the laws introduced within the United Kingdom in particular through the Modern Slavery Act 2015 to combat modern slavery.

This statement outlines the steps TNT UK has taken to minimise the risk of modern slavery in its business and its supply chains and sets out TNT UK’s future plans.

#### **ABOUT TNT UK**

TNT UK provides parcel delivery services on a national and international basis through its established pick-up and delivery network. TNT UK has its head office in England and operates from an additional 98 sites located across the United Kingdom. TNT UK has over 9,000 employees.

In May 2016, TNT UK was acquired by FedEx Corporation (“FedEx”). FedEx has its head office in the United States.

#### **TNT UK’S SUPPLY CHAINS**

TNT UK receives a variety of goods and services from many different suppliers. Key supplies for a transportation company like TNT UK include fuel for motorised vehicles, packaging, equipment and personnel (for example temporary/agency staff).

#### **RELEVANT POLICIES**

TNT UK acts in accordance with FedEx’s Code of Business Conduct and Ethics. This Code sets out the expectations required of TNT UK to ensure compliance with the law wherever it operates and to maintain high standards of business and personal ethics.

TNT UK maintains a strong culture of ethics and integrity that supports and encourages compliance with its internal policies and procedures. TNT UK’s current set of policies and procedures reflect TNT UK’s commitment to carrying out its business in an ethical and responsible manner and help to ensure that modern slavery does not occur within TNT UK business or its supply chains.

These policies include:

- Modern Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Harassment at Work Policy
- Equal Opportunities Policy

## **DUE DILIGENCE PROCESSES IN RELATION TO MODERN SLAVERY**

TNT UK requires its suppliers to operate in full compliance with all applicable laws and follow through on these obligations. TNT UK's Terms and Conditions for the Purchase of Goods and Services have been revised to include a contractual commitment requiring suppliers to act in accordance with all applicable anti-slavery and human trafficking laws in force, including but not limited to, the Modern Slavery Act 2015. TNT UK has also developed standard modern slavery compliance provisions which will be included in all bespoke supplier contracts.

TNT UK is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains. TNT UK fully expects the same high standards from its suppliers. TNT UK will check its high risk suppliers comply with its standards by asking them to complete TNT UK's Modern Slavery Supplier Questionnaire. This Questionnaire asks suppliers to confirm, amongst other things, what steps they are taking to mitigate risks of modern slavery taking place in their own supply chains.

## **RISK ASSESSMENT**

Given the nature of TNT UK's transportation business model, and the controls that TNT UK has in place, it does not believe that there is a significant risk of modern slavery within its business or within its supply chains. However, TNT UK is not complacent and recognises that, although it is banned in most countries, modern slavery continues to take place around the world and that it can always do more to identify and mitigate potential risks of modern slavery occurring within its business and its supply chains.

As part of TNT UK's initiative to identify and mitigate risk, TNT UK has implemented a policy on Modern Slavery and Human Trafficking and has communicated the policy and guidance to relevant management across the company. This policy sets out the behavioural standards TNT UK expects its employees, subcontractors and its suppliers to adhere to.

TNT UK further aims to mitigate risk by maintaining its Confidential Feedback Line. This line can be accessed by all TNT UK employees or any other person who wishes to raise a concern. TNT UK encourages its employees or other parties to raise concerns about any issue or suspicion of modern slavery through the Confidential Feedback Line. All reports received through the Confidential Feedback Line are acted upon promptly. TNT UK also encourages its employees to report modern slavery issues or concerns directly and openly to their line-managers or in accordance with TNT UK's Whistleblowing Policy Procedure. TNT UK prohibits any form of retaliation against a person who reports in good faith any concern they have about any issue or suspicion of modern slavery.

## **TRAINING**

To ensure TNT UK employees understand the risks of modern slavery, TNT UK will provide training on the Modern Slavery Act 2015 and its requirements to those employees which are most directly involved with suppliers, such as its procurement function. Where it considers appropriate, TNT UK will also provide training to other departments.

## **NEXT STEPS**

Within the next financial year, TNT UK will aim to:

- Provide training to the procurement function and review other areas of the business where training may be required.
- Continue to enhance its operations and internal controls by continuing to build upon the robust compliance culture that it has in place.
- Seek to maintain its high standards and identify ways to further enhance this.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TNT UK's Slavery and Human Trafficking Statement for the financial year ended 31 May 2017.

## **BOARD APPROVAL**

This statement is signed on behalf of the Board of Directors by Trevor Hoyle, Senior Vice President for FedEx Express & TNT.

## **TNT EXPRESS ICS LIMITED: MODERN SLAVERY ACT 2015 COMPLIANCE STATEMENT FOR FINANCIAL YEAR ENDED 31 MAY 2017**

TNT Express ICS Limited (“TNT ICS”) recognises that it has a responsibility to be alert to the risks of slavery, servitude, forced and compulsory labour and human trafficking (“modern slavery”). TNT ICS is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

TNT ICS is fully supportive of the laws introduced within the United Kingdom in particular through the Modern Slavery Act 2015 to combat modern slavery. This statement outlines the steps TNT ICS has taken to minimise the risk of modern slavery in its business and its supply chains and sets out TNT ICS’s future plans.

### **ABOUT TNT ICS**

TNT ICS provides back office IT requirements to the wider TNT Group on a global basis. The TNT Group provides parcel delivery services on a national and international basis through its established pick-up and delivery network.

In May 2016, the TNT Group was acquired by FedEx Corporation (“FedEx”). FedEx has its head office in the United States.

### **TNT ICS SUPPLY CHAINS**

In order to provide IT services to the TNT Group, TNT ICS purchases IT related goods and services from recognised global suppliers. These include applications, networks, IT hardware, IT software and IT related professional services.

### **RELEVANT POLICIES**

TNT ICS acts in accordance with FedEx’s Code of Business Conduct and Ethics. This Code sets out the expectations required of TNT ICS to ensure compliance with the law wherever it operates and to maintain high standards of business and personal ethics.

TNT ICS maintains a strong culture of ethics and integrity that supports and encourages compliance with its internal policies and procedures. TNT ICS’s current set of policies and procedures reflect TNT ICS’s commitment to carrying out its business in an ethical and responsible manner and help to ensure that modern slavery does not occur within TNT ICS business or its supply chains. These policies include:

- Modern Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Harassment at Work Policy
- Equal Opportunities Policy

## **DUE DILIGENCE PROCESSES IN RELATION TO MODERN SLAVERY**

TNT ICS requires its suppliers to operate in full compliance with all applicable laws and follow through on these obligations. TNT ICS seeks to include a contractual commitment requiring suppliers to act in accordance with all applicable anti-slavery and human trafficking laws in force, including but not limited to, the Modern Slavery Act 2015. TNT ICS has developed standard modern slavery compliance provisions which are included in all bespoke supplier contracts.

TNT ICS is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains. TNT ICS fully expects the same high standards from its suppliers. TNT ICS will check its high risk suppliers comply with its standards by asking them to complete a Supplier Due Diligence Questionnaire which, among other things, asks suppliers to confirm what steps they are taking to mitigate risks of modern slavery taking place in their own supply chains.

## **RISK ASSESSMENT**

Given the nature of TNT ICS's business model, and the controls that TNT ICS has in place, it does not believe that there is a significant risk of modern slavery within its business or within its supply chains. However, TNT ICS is not complacent and recognises that, although it is banned in most countries, modern slavery continues to take place around the world and that it can always do more to identify and mitigate potential risks of modern slavery occurring within its business and its supply chains.

As part of TNT ICS's initiative to identify and mitigate risk, TNT ICS has implemented a policy on Modern Slavery and Human Trafficking and has communicated the policy and guidance to relevant management across the company. This policy sets out the behavioural standards TNT ICS expects its employees, subcontractors and its suppliers to adhere to.

TNT ICS further aims to mitigate risk by maintaining its Confidential Feedback Line. This line can be accessed by all TNT ICS employees or any other person who wishes to raise a concern. TNT ICS encourages its employees or other parties to raise concerns about any issue or suspicion of modern slavery through the Confidential Feedback Line. All reports received through the Confidential Feedback Line are acted upon promptly. TNT ICS also encourages its employees to report modern slavery issues or concerns directly and openly to their line-managers or in accordance with TNT ICS's Whistleblowing Policy Procedure. TNT ICS prohibits any form of retaliation against a person who reports in good faith any concern they have about any issue or suspicion of modern slavery.

## **TRAINING**

To ensure TNT ICS employees understand the risks of modern slavery, TNT ICS will provide training on the Modern Slavery Act 2015 and its requirements to those employees which are most directly involved with suppliers, such as its procurement function. Where it considers appropriate, TNT ICS will also provide training to other departments.

## **NEXT STEPS**

Within the next financial year, TNT ICS will aim to:

- Provide training to the procurement function and review other areas of the business where training may be required.
- Continue to enhance its operations and internal controls by continuing to build upon the robust compliance culture that it has in place.
- Seek to maintain its high standards and identify ways to further enhance this.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TNT ICS's Slavery and Human Trafficking Statement for the financial year ended 31 May 2017.

## **BOARD APPROVAL**

This statement is signed on behalf of the Board of Directors by Koen Vermeulen.