

**KUEHNE + NAGEL LIMITED****Anti-Slavery and Human Trafficking Statement 2024****Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of Kuehne + Nagel Limited operating under the consolidated group of Kuehne + Nagel International AG as the parent company.

This statement provides an overview of Kuehne + Nagel Limited's policies and due diligence processes relating to the risk of modern slavery in the UK and should be regarded as complementary to the Kuehne + Nagel International AG Sustainability Report<sup>1</sup> which we use to report against our commitments under UN Global Compact (UNGC) 10 principles.

It also provides an overview of the work Kuehne + Nagel Limited has done in the financial year ending 31 December 2024 to minimise the risk of labour exploitation and human trafficking occurring in its business or supply chains. This modern slavery statement has been approved by the Board of Kuehne + Nagel Limited.

**Our business**

Kuehne + Nagel International AG provides logistics services to around 400,000 customers worldwide. The holding company Kuehne + Nagel International AG is recognised as the global number one in air and sea logistics and has strong market positions in road and contract logistics, with approximately 80,000 employees in 94 countries. Kuehne + Nagel International AG is registered in Schindellegi, Switzerland and is listed on the SIX Swiss Exchange.

Kuehne + Nagel Limited is a limited company offering logistics services and integrated logistics solutions across five key business units: Air Logistics, Road Logistics, Sea Logistics, Contract Logistics and Integrated Logistics. We have over 3,400 employees across the UK, with an annual UK turnover of £1.1 billion and a registered head office in Uxbridge, UK.

Our operations are illustrated below:

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<sup>1</sup> <https://2024-annual-report.kuehne-nagel.com/sustainability-report>



## Our value chain

The majority of revenue earned by our business is through specialised service provision carried out by full-time employees of Kuehne + Nagel Ltd. In providing these services, we maintain ongoing relationships with circa 1,600 suppliers.

We are committed to acting ethically and with integrity in all our business relationships. As such, we recognise our responsibility to manage our businesses and supply chains to identify and alleviate any potential or actual human rights violations. The Kuehne+Nagel Code of Conduct, alongside our Supplier Code of Conduct, global- and UK-level Human Rights Policies<sup>2</sup>, and our formal support for the UN Global Compact<sup>3</sup>, all demonstrate our commitment to human rights and fair working conditions.

Across our business and supply chain, we promote a culture that fully supports and respects human rights, and our global 'KN Ethics & Compliance Programme' is designed to ensure

<sup>2</sup> <https://de.kuehne-nagel.com/documents/237086/10726169/company-corporate-governance-kuehne-nagel-human-rights-policy.pdf>

<sup>3</sup> <https://unglobalcompact.org/what-is-gc/participants/138254-Kuehne-Nagel-Management-AG>

that we comply with all legal and regulatory requirements as well as with our internal regulations and other rules of professional and ethical conduct.

### **Identifying modern slavery risks**

We are committed to continuous improvement in our approach to assessing, monitoring and mitigating risks relating to slavery and human trafficking. To enhance and complement our own assessment and procedures, as well as to add in further levels of rigour and good practice, in 2023 we engaged the Wilberforce Institute at the University of Hull to review our modern slavery and human rights risk assessment process and provide us with clear actions for targeting any continuing and new risk areas.

The assessment involved: (1) the completion of questionnaires by and interviews with over 25 leaders and key stakeholders throughout the UK business; and (2) the assessment and risk mapping across key categories of individual suppliers, to pinpoint our key risk areas, which were identified as suppliers in sea logistics, haulage, contract logistics and use of agency labour.

This review provided us with recommendations to augment our existing processes and policies. It has also enabled us to further develop, embed and drive forward our human rights agenda throughout our business and supply chain, which we have used to inform our processes and policies from 2024 onwards.

The assessment results showed that Kuehne + Nagel Limited's most salient human rights risks were: working conditions in the supply chain, health and safety in the supply chain, bullying and harassment in the supply chain, and awareness of grievance and confidential whistleblowing mechanisms.

### **Modern slavery risks within our business**

We believe our highest area of potential risk within our direct operations is in the use of agency labour. To mitigate our supply chain risk and as part of their contractual relationship with us, we require all suppliers in the UK to confirm that they will comply with our Supplier Code of Conduct and always pass on our approved contractor requirements.

Whilst the risk of modern slavery occurring in our direct operations is lower, there can also be a risk of modern slavery occurring in areas of our operation where we have less visibility over second-tier suppliers, or where suppliers are dependent on agency labour. To address this risk, Kuehne+Nagel makes it a formal requirement for all suppliers to gain authorisation to use and declare the use of any subcontractors employed in the delivery of services to us.

### **Modern slavery risks within our supply chain**

The human rights assessment and risk mapping exercise highlighted modern slavery risks associated with the supply chain for the logistics sector. For example, the use of migrant workers and contracted labour, a potential lack of traceability on working hours and wages further down the supply chain, as well as the potential presence of gangmasters in

warehousing and facilities management. The risk assessment also suggested that, across all sectors, the greatest risk lies with smaller companies which in some cases lack formal policies and processes on ethical trade, labour and human rights, or lack management systems and monitoring programmes to effectively deal with modern slavery.

To mitigate these potential risks, we mandate the highest employment standards in all our operations and require our suppliers to sign up to and comply with the Kuehne+Nagel Supplier Code of Conduct. As part of our ongoing due diligence, all our suppliers are robustly checked during the onboarding process and before being commissioned for any work. Our suppliers must commit to upholding human rights of workers and our confidential reporting line is open to everyone.

As part of our Supplier Code of Conduct, suppliers agree not to use forced, indentured, involuntary, or child labour and agree to uphold internationally proclaimed human rights of workers. We take compliance with our Supplier Code of Conduct seriously and any suspected breach will lead us to carry out an investigation and to take remedial steps as required.

### **Managing Modern Slavery Risks**

To combat the key risk areas identified above we have in place a preferred vendor programme with our suppliers of agency and seasonal workers and a supplier management solution for direct suppliers of haulage and transportation services. These programmes include a rigorous and significant due diligence procedure, designed to support our commitment to work only with reputable organisations who share our commitment to tackling modern slavery and human trafficking risk.

### **Governance**

In addition to the external review in 2023, throughout 2024 we have continued to review our risk profile and have held regular meetings of our internal Anti-Slavery and Human Rights steering group, comprising key stakeholders from across relevant functions within the company. This allows us to remain focussed on the key risk areas in the business, identify any new areas, and take any further necessary steps to continue the prevention of slavery and human trafficking in our business and supply chains.

### **Our policies in relation to modern slavery**

Kuehne + Nagel Limited is committed to acting in accordance with our legal, regulatory, and other compliance requirements. Our company and employees operate under a number of policies designed to ensure a high standard of social governance and ethical compliance, including our comprehensive Supplier Code of Conduct. All policies are available internally on our intranet and key policies are placed on our website.

### **Supplier Code of Conduct**

Our Supplier Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. It is a fundamental commitment to comply with all applicable

legal requirements and with high ethical standards. The code outlines responsibilities to colleagues, customers and to Kuehne + Nagel Ltd. The Supplier Code of Conduct highlights these commitments and sets out how we will work with our suppliers to address potential areas of risk. If a problem is identified, we will work together with the supplier to address any areas of concern. Where we are unable to satisfactorily resolve the issue, we may terminate our use of them as a supplier or contractor.

## Policies

In addition to the Supplier Code of Conduct, Kuehne+Nagel maintains policies on customers and suppliers, human rights, and the rights of employees. Specific policies applicable to modern slavery include:

- Code of Conduct
- Global Human Rights policy
- UK Modern slavery and Human Rights Policy (published March 2025)
- Recruitment and selection policy
- Whistleblowing policy and procedure
- Bullying and harassment policy
- Safeguarding policy
- Domestic abuse policy
- Grievance Policy
- Equality and Diversity Policy

All of these are available on our intranet.

## Due diligence

Kuehne+Nagel is committed to respecting human rights in line with the UN Guiding Principles. We take a risk-based approach to our human rights due diligence activities and continuously strengthen key processes that enable us to identify and act upon actual and potential human rights risks in our operations and through our business partnerships.

We assess compliance with our Supplier Code of Conduct with suppliers in high-risk categories by conducting due diligence activities such as risk assessments and documentation reviews.

In addition to this, in 2024 we engaged the Wilberforce Institute at the University of Hull to conduct some on-site modern slavery risk assessments across our operations and for logistics and service-suppliers, primarily relating to third party workers in warehouses. See below (under 'Site Risk Assessments') for further information.

## Training

To ensure that our employees have a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have continued to roll out training to colleagues and plan to develop an updated learning module to recognise all updates and best practices in 2025. To supplement this, we have developed

and rolled out bespoke training for key stakeholders and leaders to further embed the importance of modern slavery throughout our business.

### **Collaboration and stakeholder engagement**

On human rights issues, ongoing engagement with civil society and wider stakeholders is important for informing our approach. We engage with stakeholders and their representatives including unions and experts in labour and human rights, such as the Wilberforce Institute. Kuehne+Nagel has a unionised workforce within the fulfilment and delivery areas of our business, and we consult with employee representative bodies, including trade unions and works councils.

### **Whistleblowing System**

Kuehne + Nagel Limited has a Whistleblowing Policy for all its employees and those working on Kuehne+Nagel sites, including contractors, consultants or person acting in the name of the company.

This is supported with a confidential hotline<sup>4</sup> to assist employees and suppliers when ‘speaking up’ on a confidential basis. The hotline number is included in our Code of Conduct and is run by an independent third-party service provider NAVEX. The policy is designed to allow both employees and suppliers to raise concerns and to disclose information which the individual believes highlights or would indicate illegality, unethical behaviour or other serious malpractice, including any instances or suspicions of modern slavery. There were no reports made relating to modern slavery or human rights in 2024.

### **Site Risk Assessments**

In response to the results of our third-party desk research, in 2024 we conducted a number of on-site risk assessments at Kuehne+Nagel locations across a selection of our business units in the UK. The assessments identified areas for improvement, including a reliance on labour agencies in certain operational areas, opportunities to enhance practices around recruitment and worker terms and conditions, instances of extended working hours, and the need for clearer communication channels to support agency workers in raising any concerns.

As a result of these findings, in 2024 Kuehne+Nagel began working with the Wilberforce Institute on a remediation programme to address these areas for improvement. This remediation work is ongoing and due to be completed in 2025. Additionally, the results of these assessments have provided us with valuable information to set and maintain a robust baseline for compliance, enhancing systems and planning future actions.

### **Continued measurement of our effectiveness**

To supplement our previous assessments and findings, in 2025 we will conduct risk assessments at a number of additional Kuehne+Nagel sites, including relevant suppliers who

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<sup>4</sup> <https://home.kuehne-nagel.com/en/-/company/sustainability/corporate-governance/compliance/crl>

operate at those sites, to help us validate that our policies and procedures are working well throughout our business. The key aims of these assessments are to map out management practices and identify key areas of intervention. We will use these findings to strengthen our due diligence processes and monitor our performance.

### **Key Performance Indicators (KPIs)**

We have worked with external modern slavery experts to review our existing systems, benchmark our level of compliance, and advise on enhanced systems, due diligence, and management KPIs. Throughout the year we have discussed the development of appropriate KPIs to measure our effectiveness and plan to roll these out in 2025. Appropriate targets for these KPI's will then be reviewed and agreed annually.

### **Continuous improvement**

Kuehne + Nagel Ltd takes compliance with the Modern Slavery Act seriously and believes in a continuous improvement approach. At least once every year, supported by our internal Anti-Slavery and Human Rights steering group, we will review our existing anti-slavery and human trafficking systems to ensure that they reflect current best practice and update them as required.

### **Further steps**

We recognise the extremely complex nature of modern slavery and we will continue to monitor our operational practices. We have identified the following as key actions for 2025:

- Further assessment of suppliers of services in high-risk indirect procurement categories such as cleaning, facilities management and construction to ensure compliance;
- Development of enhanced training for all employees;
- Further on-site modern slavery risk assessments at additional Kuehne+Nagel sites in the UK, as described above;
- Continued regular meetings of our internal Anti-Slavery and Human Rights steering group; and
- At least quarterly review and discussion to include broader stakeholders, bringing together business units, procurement managers, HR, sustainability, QSHE, legal and compliance teams.

The Board of Kuehne + Nagel Limited as well as the Board of Kuehne + Nagel Management AG recognise the importance of tackling human trafficking and modern slavery and the directors aim to ensure that slavery and human trafficking have no part in our operations and supply chain. This statement has been approved by the Managing Director of Kuehne + Nagel Limited for the financial year ended 31 December 2024.

Pamela Quinn  
Managing Director