

Questions to the Board of directors of DHL Group/Deutsche Post AG, and answers, at the AGM on 02 May 2025.

[Unofficial translation by WSRW]

Questions from WSRW:

2025 marks the 50th anniversary of Morocco's occupation and systematic plundering of Western Sahara's natural resources. The clear legal status of Western Sahara was reaffirmed in October 2024 by three further rulings by the Court of Justice of the European Union (CJEU). The rulings state that the EU-Morocco trade and fishing agreements in the territory are illegal because they violate the Sahrawi people's right to self-determination. The Court emphasises that respecting the right to self-determination requires the consent of the very narrowly defined 'people' of Western Sahara - not the 'population' of the territory, which is largely made up of Moroccan settlers. DHL has argued in the past that its presence in El Aaiún benefits the 'local population'. However, the CJEU has now clearly rejected this argument as unlawful.

DHL has operated a branch in the occupied territory in the past - without the consent of the people of Western Sahara. Its website presented El Aaiún as part of Morocco. Deliveries there were treated as national Moroccan deliveries.

1. According to the DHL website, there is currently no longer a branch in El Aaiún. Is this information correct?
2. Is DHL active in other locations in the territory of Western Sahara?
 - a. If not, will DHL refrain from further activities in Western Sahara as part of its compliance management and ESG governance until the decolonization process is completed in accordance with relevant UN resolutions and the right of peoples to self-determination?
 - b. If yes, through which local agent are the local services provided?
3. How many deliveries has DHL made annually since 2020 within Western Sahara, between Western Sahara and Morocco or between Western Sahara and all other countries? Do national rates apply for deliveries between Western Sahara and Morocco or does DHL charge the price for an international delivery?

Answers from DHL Group:

You asked how many shipments we have handled. You also referenced on our website that we no longer have a branch in El Aaiún and asked if we could confirm this. You also asked which local partners we work with in Western Sahara.

We can say that we transported around 2000 shipments from Western Sahara and 1400 shipments to Western Sahara every year from 2022 to 2024.

The majority of outgoing deliveries were from private customers, while the majority of deliveries to the territory were commissioned by the UN or UN-related organizations.

According to our estimates, deliveries to and from Morocco accounted for less than ten percent of the aforementioned number.

4. To what extent is the argument that the DHL Group's activities enable the population to participate in the global economy and international exchange tenable or relevant in the light of the conclusions of the Court of Justice of the European Union (CJEU), which set out the difference between the "population" and the "people" of Western Sahara?
5. What measures has DHL taken to ensure that the benefits it claims to derive from its operations are benefiting the actual people of the territory, who are now a minority in the territory and the majority of whom live in refugee camps in Algeria?
6. What measures has DHL taken to ensure that these benefits do not accrue to a settler economy?

You went on to ask about our presence and how we deal with the local conditions and also whether we are not indirectly contributing to supporting an illegal settler economy. Allow me to say in general terms that we strive to be present everywhere in the world. We are of course familiar with the argument that this presence is not sensible or morally justifiable for certain reasons. There can be different opinions, as you can see from the shipments we transport. It is also often the case with sanctioned countries that medicines are exempt and there are also humanitarian reasons where you can say that this is a morally justifiable commitment.

However, the decisive factor for us is the legal situation. Can we operate there and can we do so safely? That is our primary focus.

In Western Sahara, the service in El Aaiún is provided by a subcontractor. However, no collection, no pick-up, no delivery is offered. The shipments are delivered to or picked up from a service point operated by the subcontractor in El Aaiún.

As I have already mentioned, it is always very important in our activities - we adhere to this very closely and it is not always easy - that we comply with the legal framework there.