1. Introduction

We aim to ensure that DP World contributes to a secure and resilient society in the communities where we operate. Our data-driven logistics transform business and help us lead the future of global trade, enabling the most productive, efficient, sustainable and safe trade solutions globally. This is as important commercially as it is to the societies where we live and work. As a global employer, DP World strives to play a role in improving people's lives, strengthening communities and protecting the environment. This means we do not tolerate slavery, servitude, forced labour or human trafficking anywhere in our operations or those of our suppliers.

Sultan Ahmed Bin Sulayem, Group Chairman and CEO

2. Our organisation

DP World enables global trade through a network of ports and terminals, parks, logistics and economic zones, and maritime services. Our dedicated team of over 53,000 employees from more than 130 countries partners with governments, shipping lines, importers and exporters, communities, and many essential constituents of the global supply chain, adding value and providing quality services today and tomorrow.

In 2020, DP World handled more than 71 million TEU (twenty-foot equivalent units) across our portfolio. With its committed pipeline of developments and expansions, the current gross capacity of 93 million TEU is expected to increase depending on market demand.

3. Our policies and procedures on modern slavery and human trafficking

Our commitment to ensuring that there is no modern slavery or human trafficking anywhere in our business and our supply chains globally is delineated in our Group Policies. DP World’s annually revised Modern Slavery and Human Trafficking Policy describes our approach both within the organisation and with our suppliers. The policy also describes how our employees can report any suspected incidents.

Other key policies include provisions concerning modern slavery and human trafficking, such as:

- Procurement Policies and Procedures, setting out minimum criteria applied to DP World’s approved vendors, including provisions concerning modern slavery, human trafficking and child/forced labour.
- Company Standards and Conduct Policy and Procedure, setting out employees’ obligation and the process to report suspected and known incidents of modern slavery and human trafficking, and consequences for failure to report.
- Recruitment and Selection Policy, including a prohibition on the use of child labour and on withholding workers’ original government-issued identification and travel documents, unless required by law.

We have established a Supplier Self-assessment on Modern Slavery, and Human Trafficking as part of our vendor screening process; a vendor code of conduct; and prospective vendors’ modern slavery or human trafficking risk is factored into our procurement decisions.

In 2019, DP World became a signatory to the United Nations Global Compact (UNGC) and its ten principles, encompassing human rights, labour, the environment and anti-corruption. As a signatory, DP
World commits to aligning its strategies and operations with these principles. DP World established an internal Human Rights Working Group in 2019 and developed and implemented a Human Rights framework and associated policy. The eradication of modern slavery is integral to our human rights approach. We intend to further integrate our approach in these areas and broaden the group’s range of procedures and programmes.

Policy compliance is monitored internally by management and independently assessed by Internal Audit during planned business audits.

4. Our Supply Chain:

We seek to partner with suppliers whose ethical principles align with our own, and we expect them to operate fair and ethical work practices. Group Procurement provides structured policies, procedures and guidelines across our global business units to effectively manage local supply chains.

Our suppliers are required to complete a Supplier Modern Slavery and Human Trafficking Self-assessment. This assessment includes an analysis of the risk of modern slavery and human trafficking in the jurisdictions where they operate and identifying the policies and procedures to mitigate such risk.

Based on the evaluation and analysis of the Supplier Modern Slavery and Human Trafficking Self-assessment, additional modern slavery desktop audits and knowledge-sharing sessions may be conducted with contractors and consultants who have been awarded tenders and are identified as presenting a high risk of exposure to modern slavery and human trafficking.

We seek to include modern slavery and human trafficking tender conditions and contract clauses as part of our standard tender and contract documentation. This further improves compliance with our modern slavery and human trafficking policy.

We have a confidential, externally administered, whistleblowing hotline available to all DP World workers and third parties to report suspected human rights violations. Reporting parties are protected from retaliation in any form.

5. Areas of risk in our business and supply chains

The risk of modern slavery and human trafficking varies by location and sector. DP World has, therefore created a working group to address emerging issues. This working group has identified procurement, third-party contractors and the use of ports by human traffickers as the highest risk areas for DP World.

To mitigate these risks, we have increased our oversight of, and requirements for, vendors and third-party contractors concerning modern slavery and human trafficking. Our Global Security team works closely with global law enforcement agencies to enhance supply chain security and prevent human traffickers from using DP World’s terminals and facilities. We continuously improve our security management systems, implementing robust risk management programmes, deploying innovative security technologies, conducting internal and external audits, and providing awareness training on the indicators of modern slavery and human trafficking, particularly in combination with other criminal activities.

As well as implementing and acquiring the mandatory security regulatory accreditations like ISPS Code, DP World has raised its security benchmark by implementing and accrediting to ISO 28000 (Supply Chain Security Management System) and other Global Security Initiatives across its portfolio, such as the Custom-Trade Partnership Against Terrorism (CTPAT), Authorized Economic Operator (AEO) and Container Security Initiatives (CSI) further mitigating human trafficking threats in our terminals and facilities.

6. Effectiveness of efforts
We continuously work on building and maintaining awareness and understanding amongst our employees, workers, and contractors of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and other modern slavery regulations from around the world, as well as providing the tools to identify potential issues. As part of this effort, in 2019, we held a knowledge-sharing session with one of our major contractors on this topic. Over time, we will develop key performance indicators across our various business units to ensure that our modern slavery and human trafficking policies and procedures are implemented to maximum effect.

7. Training

DP World has launched an online training module titled “Modern Slavery Awareness”. This training is available in ten languages. It is a mandatory requirement for all employees on the organisation’s email network and includes an overview of the policy and modern slavery and human trafficking indicators.

Information on modern slavery and human trafficking is also provided to port workers at operational briefings, where appropriate. Such training is mandatory and is part of one of the six online courses which are part of the induction for new employees.

Posters are provided in various languages to each business unit to raise awareness and remind employees of the signs of modern slavery and how to report suspected incidents.

This statement is made according to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. It constitutes DP World’s modern slavery and human trafficking statement for the financial year ending 31 December 2019 and has been approved by DP World’s board of directors.

Sultan Ahmed Bin Sulayem

Group Chairman and CEO

09 March 2021