

# **GLOBAL INCLUSION & DIVERSITY POLICY**



**DP WORLD**

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## Introduction

**A diverse world. A stronger future.**

DP World is on a mission to reimagine the global supply chain, leveraging our assets worldwide. We want to create a workplace that transcends boundaries and bridges the gap between all nations and cultures.

We are proud of the diverse and cohesive workforce that we have built together over the years while forging a business culture that provides value to all our stakeholders, living Our Principles. We are committed to building a culture where differences are recognized and celebrated, a culture that fosters a sense of belonging in our people.

Free minds and diverse mindsets are changing our world, and together we can change what's possible.

## Purpose

The Inclusion and Diversity (I&D) policy outlines DP World's commitment for a globally equitable and inclusive culture for all our employees, as well as our clients, suppliers, and broader stakeholders.

Through *Our Principles*, we aim to create an environment that helps others succeed, giving space for learning, growth, and new ideas. This collaboration lies at the core of our I&D work and is instrumental to make DP World an agile, adaptive, and future-focused organisation.

DP World is committed to providing equal opportunities to all employees, applicants, and stakeholders; in line with its mission to bridge the gap between all nations and cultures and take pride in its diverse and cohesive workforce.

## Scope

This policy applies to all DP World employees and stakeholders.

It relates to any conduct that, in the reasonable opinion of the company, is connected to the company, including but not limited to conduct that:

- Occurs on, or in connection with, the company's premises or other property owned, managed, or occupied by the company or any of its subsidiaries, or third parties like contractors, vendors, suppliers, etc.
- Takes place at or in connection with any company related conference or event
- Involves any form of contact or communication, whether initiated in person, or by phone, cameras, social networking or media, email, SMS communication or any other means
- Occurs in connection with the employment status of an employee.

Breach of this policy shall be dealt in accordance with the relevant policies and legislation.

DP World seeks to have a consistent and equitable culture across its businesses globally. However, local regulations and law of the land shall supersede this policy where relevant and shall be used for adherence and setting out local processes, procedures, and controls.

# Policy

## 1. Our Commitment to Inclusion and Diversity

- 1.1. I&D is the responsibility of everyone. The role of individual stakeholders within DP World is crucial to promoting diversity, raising awareness in the workplace, modelling inclusive behaviour, as well as speaking out for inclusion and against any form of discrimination.
- 1.2. Equal Employment Opportunity refers to the fair and unbiased treatment of employees in the workplace.
- 1.3. DP World is committed to creating a company culture of inclusion and acceptance, prohibiting discrimination against any employee (or prospective employee) based on certain characteristics.
- 1.4. Expectations from DP World stakeholders:
  - To foster collaboration throughout DP World with emphasis on treating others with dignity and respect
  - To attend I&D trainings and workshops
  - To build a safe working environment where every employee feels comfortable being their true selves at work.

## 2. Our delivery on the Inclusion and Diversity commitments

- 2.1. DP World constantly endeavours to create awareness and educate people on the various resources and mechanisms that are available should anyone ever experience discriminatory or biased behaviour within the organisation.
- 2.2. DP World uses various content and channels to drive this:
  - The I&D global and regional policies
  - Internal awareness emails
  - A micro-learning module to help employees understand the situations whereby these policies can come into play in a simplified manner
  - The organisation-wide unconscious bias training
  - The I&D toolkit
  - Relevant sessions to build and drive understanding on related topics
  - Annual evaluation through various reporting frameworks such as **United Nations, WEPS (Women's Empowerment Principles), ESG (Environmental, Social, Governance)**, etc.

## 3. Discrimination, Bullying and Harassment

- 3.1. Discrimination is when a person, or a group of people, is treated less favorably than another person or group because of their background or certain personal characteristics, such as:
  - Age, beliefs, childbirth, skin color, disability, ethnicity, gender identity or expression, genetic information, national origin, maternity, medical conditions, political affiliation, pregnancy, race (or traits historically associated with race), religion, veteran status, or any other category protected by local jurisdiction.

The above-mentioned list shall be herein referred to as the "Protected Characteristics".

- 3.2. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power

does not always mean being in a position of authority but can include personal strength or the power to coerce through fear or intimidation.

- 3.3. Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- 3.4. Harassment also includes treating someone less favorably for having submitted or refused to submit to such behaviour in the past.
- 3.5. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to any of the Protected Characteristics. Harassment is unacceptable even if it does not fall within any of these categories.
- 3.6. The examples below show behaviour that may be considered discrimination, bullying or harassment. These examples are illustrative only and should not be considered as exhaustive.

#### Discrimination:

- Derogatory remarks about a person's race, ethnicity, or color, or display of racially offensive symbols.
- Treating an employee or stakeholder differently because of their gender or age.
- Workplace or job segregation based on religion, including garb or grooming practices. For example, prohibiting an employee from a particular religion from working in customer service roles based on actual or feared customer preferences.
- Stating or suggesting preferred candidates on discriminatory grounds in a job advertisement or excluding candidates during recruitment process, unless this is considered appropriate to increase representation of an underrepresented group or to achieve legally mandated hiring targets or requirements, always acting in compliance with local laws.
- Denying certain employees' compensation or benefits on discriminatory grounds.
- Paying equally qualified employees in the same position different salaries on discriminatory grounds.
- Discriminating when assigning disability leave, maternity leave, or retirement options.
- Discrimination when issuing promotions or lay-offs.

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** treating someone less favorably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views.
- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified.
- **Victimization:** retaliation against someone who has complained or has supported someone else's complaint about discrimination, bullying or harassment.

#### Bullying:

- Physical or psychological threats.
- Unnecessarily overbearing and intimidating levels of supervision.
- Inappropriate and/or derogatory remarks about someone's competencies or performance.

### Harassment:

- **Personal:** Inappropriate comments, offensive jokes, personal humiliation, critical remarks, ostracizing behaviours.
- **Physical:** Unwanted physical conduct, with an intent to cause physical or psychological threat and/or pain.
- **Power:** Excessive demands that are impossible to meet, demeaning demands far below the employee's capability, intrusion into the employee's personal life.
- **Psychological:** Harassment of this nature negatively impacts the individual's wellbeing and can spiral into further problems such as isolating or denying someone's presence, belittling, or trivializing the thoughts, discrediting, or spreading rumours, opposing, or challenging everything the individual says.
- **Cyber:** Sharing humiliating things about an individual by mass email or mass chat, spreading lies or gossip about the victim on social media, sending harassing instant messages or text messages directly to the individual.
- **Sexual:** Sharing inappropriate photos or videos, comments, jokes or questions, inappropriate gestures, invading personal space, quid pro quo (a favour or advantage granted in return for something), continued suggestions for social activity after it has been made clear that such suggestions are unwelcome.
- **Verbal:** Threatening, yelling, insulting, or cursing at someone in public or in private.

3.7. DP World is an advocate for Equal Employment Opportunities (EEO). This framework outlines the ways in which DP World commits to providing equal opportunities, both internally and externally

### Disabilities:

- DP World encourages hiring physically challenged/disabled employees' wherever possible as part of its inclusion and diversity strategy and providing them adequate opportunity for their career growth and development.
- If an employee is disabled or becomes disabled, we encourage the employee to inform the People department about their condition so that support can be made available from all potential resources.
- If an employee experiences a certain struggle in their position because of a disability, the employee is encouraged to contact their line manager to discuss any reasonable adjustments that would help them overcome or minimize the discomfort. The line manager shall consult with the employee and potentially their medical adviser about possible adjustments.
- DP World shall consider the matter carefully and try to accommodate the employee's needs within reason. If a particular adjustment is deemed unreasonable, this shall be justified by factual reasons and an alternative solution shall be considered wherever possible.
- DP World regularly monitors the physical features of its premises to assess whether they might place anyone with a disability at a substantial disadvantage. Where necessary, the company shall work on improving the accessibility of its premises and facilities to create inclusive working environments.

3.8. Additionally, DP World shall not prohibit female employees from becoming pregnant nor threaten them with adverse employment consequences, such as dismissal, loss of seniority, or deduction of wages, in order to discourage them from becoming pregnant.

- 3.9. For the avoidance of doubt, legitimate, reasonable, and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, shall not amount to bullying on their own.

## **4. Retaliation**

- 4.1. Retaliation occurs when an employer (or someone who represents the employer such as Line Manager, People Department, etc.) or individual punishes an employee for engaging in legally protected activity like raising a complaint as per the Inclusion and Diversity or Whistleblowing policies.
- 4.2. Retaliation can include any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment. At an individual level, it can include false defamation, unwillingness to collaborate or willingly jeopardizing someone's work.
- 4.3. Sometimes retaliatory action may not be as clear. In those cases, DP World shall consider the circumstances of the situation. If the adverse action would deter a reasonable person in the situation from making a complaint, or if the action is an act of vengeance because of a complaint being raised, it constitutes retaliation.
- 4.4. For the avoidance of doubt, legitimate, reasonable, and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, or reasonable adjustments made to employees' schedules or job roles due to business needs shall not amount to retaliation by the employer on their own.

## **5. Dealing with Discrimination, Bullying or Harassment and Retaliation: Informal steps**

- 5.1. If an employee is being discriminated against, bullied, or harassed, the employee should consider whether they feel comfortable raising the problem directly with the person responsible. If this is difficult or a source of fear, employees may speak to their Line Manager or HRBP (i.e. HR Business Partner/HR Manager), or anyone in their organisational hierarchy, or to the Group I&D Manager, who can provide confidential advice and assistance in seeking to resolve the issue informally.
- 5.2. As a general principle, the decision whether to progress with a complaint is up to the employee who has made the complaint. However, DP World has a duty to protect all staff and may pursue the matter independently if, in all circumstances, considered appropriate. In this regard, if someone is a witness to any kind of unprofessional behaviour as a bystander, they may report it through an informal (refer to Annexure section 1.1) or formal channel (refer to Annexure section 1.2).
- 5.3. If an employee believes they have been retaliated against, they should consider raising the incident with their HRBP/People Department representative. The HRBP may then speak with the alleged perpetrator and, if appropriate, coach the perpetrator to mitigate such situations in the future.

## **6. Raising a Formal Complaint**

- 6.1. Employees facing discrimination, bullying or harassment situations, or witness of such situations, are encouraged to raise their concerns with a trusted party (HRBP, I&D Team, Line Managers, Department Heads or others).
- 6.2. If the issue is not resolved informally, employees may ask questions, raise concerns, or report instances of potential non-compliance with this policy.

- 6.3. The formal complaint:
- Is submitted either on email or in writing (hard copy) (as required by local legislations).
  - Should contain a full description of the complaint and include the name of the perpetrator, type of discrimination, harassment or bullying, the reason for retaliation, date, and time of incident along with evidence.
  - Should specify the names of any witnesses and detail any action which may have been taken to stop it from occurring.
- 6.4. The following formal channels may be used to raise a complaint:
- Whistleblowing Hotline ([Link](#)): an independently administered and confidential reporting mechanism - [www.dpworld.com/whistleblowing-hotline](http://www.dpworld.com/whistleblowing-hotline).
  - Direct email or hard copy to line managers, HRBP, Group I&D Manager or any person within their respective organisational hierarchy.
  - Any other official channel as mandated by applicable local legislation.
  - Please refer to the annexure for detailed procedure on formal complaints.
- 6.5. In case a complaint is received through a different channel than the ones mentioned above, it shall be the responsibility of the HRBP to guide the complainant through appropriate channels.

**Potential Sanctions**

- 6.6. Where DP World considers that discrimination, harassment, bullying or retaliation has occurred, prompt action shall be taken to address it as follows:

Where the bully or harasser or perpetrator is a/an:	Action
Employee	The matter shall be dealt as a case of misconduct or gross misconduct as per local disciplinary policies
Third Party (such as customer or visitor)	DP World shall consider appropriate action, verify the complaint, and decide on any future working relationship with the concerned individuals/organisation.

- 6.7. Any staff member who deliberately provides false information, or otherwise acts in bad faith as part of an investigation may be subjected to action as per local disciplinary policies.



## Definitions and Terms

In this Policy the following definitions apply, unless the context requires otherwise:

WORDS / PHRASES	DEFINITIONS
<b>Bullying</b>	The abuse and mistreatment of someone sometimes more vulnerable through the use of force, coercion, hurtful teasing or threat, to abuse, aggressively dominate or intimidate.
<b>Bystander</b>	Someone who is not directly involved in an incident but witnesses the incident as a third party.
<b>Discrimination</b>	The unjust or prejudicial treatment of people based on Protected Characteristics.
<b>Diversity</b>	The deliberate practice of including people who are diverse in characteristics.
<b>DP World or the Group or the Company</b>	DP World Limited and its subsidiaries
<b>Employees</b>	DP World permanent and temporary employees, contractors, and consultants.
<b>Equal Opportunity Employer</b>	An employer that pledges to not discriminate against employees based on Protected Characteristics and is committed to diversity and inclusion in the workplace.
<b>Equality</b>	A state where people are all treated fairly and have access to the same opportunities regardless of their differences.
<b>Harassment</b>	Harassment is any unwanted behaviour, physical or verbal (or even suggested), that makes a reasonable person feel uncomfortable, humiliated, or mentally distressed. Sexual harassment is distinguished from consensual relationships by the introduction of the elements of coercion, threat, or other unwelcome conduct of sexual nature which makes person feel offended, humiliated and/or intimidated.
<b>HRBP</b>	HR Business Partner, People Department Manager or representative.
<b>Inclusion</b>	The practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalized based on Protected Characteristics.
<b>Protected Characteristics</b>	Personal traits, characteristics, and/or beliefs that are defined by applicable law as protected from discrimination and/or harassment. In the context of this policy, Protected Characteristics include the list below: Age, beliefs, childbirth, skin color, disability, ethnicity, gender identity or expression, genetic information, national origin, maternity, medical conditions, political affiliation, pregnancy, race (or traits historically associated with race), religion, veteran status, or any other category protected by local jurisdiction.
<b>Retaliation</b>	Retaliation is a situation where an employee who reports on harmful or illegal practices in their organisation faces negative consequences from their employer or manager.
<b>Stakeholders</b>	In this policy, context means any employee, (direct and indirect), partner, customer, any person or entity involved in the Group's supply chain, as well as members of the public who wish to express any sort of concern about the Group's business integrity.
<b>Whistle blowing hotline</b>	This is an external party hotline where employees can anonymously voice concerns or report misconduct without fear of retaliation.