

Whistleblowing Policy



DP WORLD

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Introduction

- 1.1 Any modern and diverse organisation faces many risks, including the occurrence of incidents that can harm a company's reputation, assets and the welfare of its employees. These can include but are not limited to:
- Fraud (i.e. intending to obtain benefits through dishonesty or deception involving any form of corruption such as bribery and conflicts of interest, misappropriation of assets, financial statement fraud, etc.)
 - Criminal activity
 - Miscarriages of justice
 - Danger to health and safety
 - Damage to the environment
 - Failure to comply with any legal or professional obligation, or regulatory requirements
 - Negligence
 - Breach of DP World internal policies and procedures including breaches of Human Rights laws or specific individual violations including discrimination or harassment
 - Human, drug and/or illegal Wildlife (IWT) trafficking
 - Conduct likely to damage DP World's reputation
 - Unauthorised disclosure of confidential information

These incidents can arise out of improper behavior or a deliberate violation of policies and need to be managed effectively to limit the impact to businesses and employees.

- 1.2 DP World Group (the Group) is committed to conducting its business with the highest standards of honesty and integrity and has a zero-tolerance position towards fraud. To facilitate the reporting of anything which may be contrary to that commitment, DP World has a globally accessible whistleblowing hotline to provide all stakeholders (as defined in Definitions and Terms Section herein) with a free and confidential reporting mechanism.

Purpose

- 2.1 This policy aims to provide the means and appropriate communications, and to encourage and provide stakeholders with the confidence and guidance to report all genuine suspected wrongdoing, dishonesty and fraudulent matters, in a timely manner. In accordance with the policy procedures, DP World will investigate these concerns in an effective and confidential manner, giving appropriate protection to the identity of the whistleblower as required.
- 2.2 This policy presumes that such reports of wrongdoing will be made in good faith and not maliciously, recklessly, or for personal gain. Any such reports that are not made in good faith, may be subject to action under DP World disciplinary procedures or applicable laws.
- 2.3 Where a concern involves or relates to a personal Human Resources issue, grievance, or dispute, the company provides procedures and details of the appropriate steps for employees to follow, such as reporting those to DP World People Department, or the appropriate functional management.
- 2.4 For the purposes of this policy, the definitions of 'whistleblowing' and 'whistleblower', as well as other relevant terms, are set out under Section 'Definitions and Terms' herein.

Scope

3.1 This policy is applicable to all stakeholders. It is publicly available on the internet.

Policy

Reporting Information:

- 4.1 All stakeholders are required to act honestly and with the highest levels of integrity and ethics when conducting business for or with the Group. They also have the responsibility to report any policy breach, any suspected fraud or any other wrongdoing in a timely manner via any of the below detailed reporting mechanisms.
- 4.2 All stakeholders are strongly encouraged to report any concerns as directed, in line with this policy. They should be as specific as possible and provide indications of dates, persons involved, and as full a description as possible of what is suspected.

Reporting Mechanisms:

- 4.3 Since it is likely the concerns relate to the conduct of DP World staff, and therefore might present a difficult and personal conflict for the whistleblower, the following methods of reporting are available.

DP World Global Whistleblowing Hotline – Internet

[Report directly: dpworld.ethicspoint.com](https://dpworld.ethicspoint.com)

If you have witnessed any corruption or wrongdoing that affects DP World business, or may violate laws, you can contact, 24/7, the secure Whistleblowing hotline in complete confidence via the links found in company websites. These links give you the option of choosing the preferred language for your report. All reported information is treated in the strictest confidence and will be investigated by the appropriate team. Whistleblowers can remain anonymous, and the external provider will not identify them to DP World if requested.

Letter

Please write your information in a detailed letter and send it to:

DP World
Attention: Group SVP - Fraud Risk Services
4th Floor, Building 17, Jebel Ali Freezone
PO Box 17000
Dubai, UAE

Direct Reporting

Please approach Fraud Risk Services at:

DP World
Attention: Group SVP - Fraud Risk Services
4th Floor, Building 17, Jebel Ali Freezone
Dubai, UAE

Protection/Confidentiality:

- 4.3 This policy is written with all the provisions for confidential and anonymous reporting, as it is important for stakeholders to feel secure in this reporting environment. Subject to country laws, whistleblowers have the option to remain anonymous or to identify themselves.
- 4.5 Any report or information received through the above mechanisms will be kept confidential, and any details pertaining to any possible matter of fraud or other wrongdoing, will only be conveyed to those people who require the knowledge in the performance of their office or function.
- 4.6 It is globally understood that 'whistleblowers' can be negatively portrayed as someone who is 'informing on their own', is a 'spy', or that they might be revealing information that has significant and serious repercussions for the accused. As such, they might be fearful for reporting information in the worry of being subject to retaliation.

DP World acknowledges this concern and will not tolerate retaliation of any kind relating to whistleblowers. DP World will also support anyone who raise genuine concerns in good faith under this policy, even if the information is not established as a fraud or other wrongdoing. Stakeholders must be assured that they will not be victimised or disadvantaged in reporting a breach and any person who considers they are being victimised or disadvantaged because of such reporting, should use the hotline to report this also.

- 4.7 Where evidence is found to suggest that efforts had been undertaken by any Group employee or person doing business on behalf of the group to identify the reporting party of 'whistleblowing' information, that person will be subject to disciplinary action.
- 4.8 If any reporting party believes they have become the subject of any retaliation, they are entitled to submit a retaliation complaint via the above-mentioned reporting mechanisms.

Investigation:

- 4.9 Strict confidentiality and objectivity concerning the whistleblower, and the information will be maintained at all stages of the investigation by all persons involved, including investigators, witnesses and other persons interviewed or corresponded with during the investigation. This requirement will be formally placed on all persons involved by the investigating officers.
- 4.10 Feedback on the investigation outcome may be given to the whistleblower, but only if contact details are provided to Fraud Risk Services. However, DP World cannot guarantee the outcome of the investigation will be the result the whistleblower might be seeking, nor does it undertake to provide a report to the whistleblower beyond confirmation that a conclusion was reached.

Records and Monitoring:

- 4.11 DP World Fraud Risk Services shall retain all records relating to the reports for a period in accordance with company document retention policies and/or country laws as applicable. Access to these records is strictly restricted to authorised management and staff under the guidance of the Group SVP- Fraud Risk Services and relevant authorities.

Definitions and Terms

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

Audit and Risk Committee	A committee comprising of non-executive Directors that ensures the integrity of the financial reporting and audit process and oversees the maintenance of sound internal controls and risk management systems.
Conflicts of Interest	May take many forms, actual or perceived, but generally arises when a person could use his or her position to a) influence the Group's business decisions in ways to give improper advantage or financial benefit to oneself and/or to others, or b) to obtain for oneself and/or to others a financial benefit beyond the compensation he or she is authorized to receive for performing his or her responsibilities.
Fraud	Means an intentional dishonest act or omission carried out with the purpose of deceiving, inducing a course of action or the making of false statements, orally or in writing, with the objective of obtaining money or other benefits from the Group, or of evading a liability to the Group. Fraud is not restricted to monetary or material benefits. This definition includes monetary gain and any benefit that could be gained from the Group.
Group	Refers to DP World, its subsidiaries and any company or entity managed or operated by them.
Group Internal Audit	Refers to an independent body established by The DP World Limited Board of Directors with oversight by the DP World Limited Audit and Risk Committee.
Investigation	A process designed to gather and analyse information, to determine whether a fraud incident report is substantiated, or if any dishonest or unethical acts have occurred and if so, the party or parties responsible.
Management	This includes all Executive Management of the Group at every level and location, this includes but is not limited to, SVPs, VPs and Heads of Departments or Divisions.
Malicious	An unfounded and untrue report made that is characterized by malice, hatred, and disregard or to be deliberately harmful or spiteful.
Recklessly	Where an act has taken place in such a manner that the party carrying out the act is indifferent to or disregarding of the consequences. Some form of loss is usually associated with acts of recklessness. Recklessly also means being neglectful, careless, thoughtless and unconcerned.
Stakeholder	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.
Whistleblower	A person, who is, or represents, a stakeholder and who raises a genuine concern in 'good faith' and discloses information of suspected wrongdoing.
Whistleblowing	The disclosure of information which relates to suspected wrongdoing, and not information disclosed maliciously, recklessly or for personal gain.