

# External Stakeholder Engagement Policy

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**DP WORLD**

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## Introduction

DP World is committed to building and maintaining a sustainable future, attaining operational excellence and acting as a responsible partner and corporate citizen. As a global organisation with an intricate value chain, DP World's operations affect more than just its employees and customers. External stakeholders like governments, local communities, project-affected persons, and organisational partners (NGOs & Civil Society Organisations (CSOs)) all have the potential to be impacted by Group operations and thus have an interest in how we conduct our business. Responding to external stakeholder needs in a manner that adapts to the respective stakeholder group to the extent possible is critical to DP World's business and is fundamental to the long-term health of its operational success. Therefore, this External Stakeholder Engagement Policy aims to codify DP World's overarching approach to external stakeholder engagement.

## Policy Scope & Overview

This policy focuses on DP World's (and its subsidiaries) approach to external stakeholder engagement and concerns the Group's engagement with parties outside of 'core business operations'. DP World's approach to internal stakeholder engagement with parties integral to its 'core business operations' (including suppliers, contractors and customers) is embedded in other corporate policies that are well-established governance documents and are beyond the scope of this policy. The "Related Standards, Policies & Processes" section contains a comprehensive list. For a thorough overview of DP World's commitments and overall approach to internal and external stakeholder engagement, it is recommended that this Policy be read alongside these complementary Group policies.

This External Stakeholder Engagement Policy discloses DP World's approach and acts as a guidance document for the Group, helping to provide a high-level overview of expected practices. It is a global policy and will maintain uniformity and synchronicity in approach across DP World's expansive geographic footprint. It will be complemented by a set of internal Standard Operating Procedures (SOPs). This policy and the SOPs will help the Group establish context-specific Stakeholder Engagement Plans (SEPs) at the project and business unit (BU) level. Further information is available in this policy's "Business Unit-Specific Stakeholder Engagement Plans" section. BU-specific SEPs will also consider national legislative mandates, investor expectations and other context-sensitive requirements.

DP World understands that the difference in size, scale and environmental parameters of each respective project will impact the perceived 'area of influence' and thus cascade down into the requirements of each SEP. This policy clarifies that the approach to external stakeholder engagement will vary case-by-case. Group Sustainability will work with teams on the ground to ensure that minimum requirements are met. Still, the respective project and BU teams will implement an approach proportionate to the needs of their operations.

The Policy draws from relevant stakeholder engagement best practice standards and benchmarks (including those recommended by the UNGP, ILO, and the IFC and World Bank). It is also based on a peer benchmarking exercise that has provided valuable insights into the approach taken by the Group's industry peers and leaders. The corporate policy defines minimum standards that must be met by both brown and greenfield projects, BUs and Group activities globally. The approach to external stakeholder engagement adopted at each project/business unit will differ depending on the contextual circumstances, E&S risk levels and degree of sensitivity identified. Ultimately, this policy establishes a balanced, proportionate, and practicable approach to external stakeholder engagement activities.

Furthermore, this External Stakeholder Engagement Policy considers external stakeholder interactions often limited to public consultation or other legislatively required one-time activities. To ensure that DP World's

approach is comprehensive, inclusive and continuous, this policy emphasises the need for active, effective and ongoing stakeholder engagement from the Organisation's approach at the project/business unit level and through to Group-level.

## Policy Objectives

As its name suggests, the External Stakeholder Engagement Policy is focused on external stakeholders; this includes project-affected persons (PAPs), local communities, governments and state entities, local institutions, NGOs and Civil Society organisations, among other external third parties, to the extent that they have a stake in DP World's activities. While this Policy covers environmental and social risk and impact mitigation, leveraging the expertise of DP World's Group Sustainability team, further specific guidance focussed on engagement with governments and civil society is contained in the functional Government Relations & Public Affairs (GRPA) Policy.

Given DP World's operational scope and presence in a wide variety of emerging market economies across several continents, the Stakeholder Engagement Policy is flexible in its implementation to adapt to any circumstances or existing constraints within respective host countries as far as reasonably practicable. To ensure an informed approach has been adopted, the policy draws from the IFC Stakeholder Engagement Good Practice Handbook for Companies Doing Business in Emerging Markets.

The External Stakeholder Engagement Policy abides by the following basic principles of stakeholder engagement, as recommended by the IFC Performance Standards & Good Practice Handbook, World Bank Equator Principles and UN Guiding Principles on Business & Human Rights (UNGPs):

- **Proactiveness:** early, eager communication with relevant/affected stakeholders – helping to build relationships built on trust, understanding and mutual respect.
- **Openness:** open and honest engagement - free of manipulation, interference, coercion, and intimidation.
- **Transparency:** communicate clear, truthful, and reliable information and ensure transparency in engagement and documentation.
- **Involvement and Inclusivity:** invite relevant/affected stakeholders to work actively and benefit from their insights and knowledge or help develop shared solutions to identified impacts. Welcome views from vulnerable groups (e.g., women, minorities, the disabled, young people, older people, etc.) - recognise and accommodate unequal power relations.
- **Appropriate:** engagement activities should be developed to respect local norms and accommodate differences in cultures and belief systems.
- **Adaptive:** dynamic engagement strategies that respond to context-sensitive risks
- **Timely and Informed:** stakeholders should receive relevant information about project activities promptly, enabling them to engage in meaningful consultation.
- **Continuous:** stakeholder engagement should be a constant process – stakeholders and stakeholders' needs evolve.
- **Collaborative:** practice active listening and promote collaboration - seek out stakeholders' views to better understand their perspectives.

# Approach to Stakeholder Engagement

As mentioned, this External Stakeholder Engagement Policy applies to DP World operations globally at the corporate, BU and project levels.



To effectively manage DP World’s approach to external stakeholder engagement, a series of building blocks have been identified, drawing from the IFC Stakeholder Engagement Good Practice Handbook for Companies Doing Business in Emerging Markets; they help to govern the organisational approach to stakeholder engagement. This policy introduces a high-level overview in subsections (a) - (i).

## a) Roles and responsibilities for engaging stakeholders

DP World understands that meaningful implementation of this policy will primarily occur at the project and BU levels. Therefore, Group Planning & Project Management and the Regions will be responsible for jointly nominating an accountable resource for Green-Field projects. Similarly, each BU Team will be allocated responsibility for Brown Field and Operating Units. Working with GRPA on the government and civil society elements and Group Sustainability on the environmental and social risk aspects, oversee-the-ground resources must develop a Stakeholder Engagement Plan outlining a governance approach to external stakeholder engagement. This plan can be implemented by leveraging shared Group resources, consultants and local partners.

The resources available across each project and BU will vary, but the size and composition of the team will reflect the situational circumstances and comparative needs.

DP World realises it may not always oversee every element of external stakeholder engagement. The Group’s partners may lead on engagement at the project design & conception stage, contractors/sub-contractors during project construction and DP World during operations. However, the Group is committed to ensuring good practices, in line with IFC Performance Standards 1 & 5, will be met throughout and will actively communicate with its partners.

## b) Stakeholder Mapping, Analysis & Engagement Methods

The stakeholder mapping process is the second step in DP World's external engagement approach and helps the Group and BUs identify their external stakeholders. The exercise is coordinated by a dedicated project and BU-level resource with Group Planning & Project Management, respective BU Management teams responsible for selecting this resource with Group Sustainability and GRPA available to provide technical support. A high-level example of this exercise is provided in the table below:

Stakeholder Group	Engagement Objectives	Potential Engagement Methods
Project Affected Persons (PAPs)	<ul style="list-style-type: none"> <li>- Sensitise individuals to project aims and related impact</li> <li>- Provide context on potential mitigation actions</li> <li>- Provide channels to raise queries, concerns and complaints</li> </ul>	<ul style="list-style-type: none"> <li>- Public Consultations</li> <li>- Focus Groups</li> <li>- Surveys &amp; Questionnaires</li> <li>- Community Feedback Mechanism</li> </ul>
Communities (including Vulnerable groups)	<ul style="list-style-type: none"> <li>- Sensitive to vulnerable groups, communicate accordingly</li> <li>- Collaborate openly, honestly, and consistently and encourage dialogue</li> <li>- Involve communities early in the project's lifecycle and ensure their views, where practical, are considered in decision-making</li> <li>- Establish a mechanism for dealing with internal/community feedback and grievances</li> <li>- Provide a nuanced approach to community engagement</li> </ul>	<ul style="list-style-type: none"> <li>- Workshops &amp; Focus Groups</li> <li>- Roundtables</li> <li>- Perception Survey Forums</li> <li>- Community Feedback Mechanism</li> <li>- Website and Social Media</li> </ul>
Governments & Regulatory Entities	<ul style="list-style-type: none"> <li>- Understand regulator expectations (benchmarked against applicable laws and legal agreements in place).</li> <li>- Openness and transparency with regulators</li> <li>- Transparent process and deliverable communications</li> </ul>	<ul style="list-style-type: none"> <li>- Workshops &amp; Focus Groups</li> <li>- Roundtables</li> <li>- Website and Social Media</li> </ul>
NGOs & Civil Society Organisations	<ul style="list-style-type: none"> <li>- Understand NGO expectations and where practical, consider it in the decision-making process.</li> <li>- Openness and transparency with NGOs</li> <li>- Communicating opportunities for partnerships</li> </ul>	<ul style="list-style-type: none"> <li>- Workshops &amp; Focus Groups</li> <li>- Roundtables</li> <li>- Perception Survey Forums</li> <li>- Public Meetings</li> <li>- Website and Social Media</li> </ul>

## c) Information Disclosure

The third step is to build a relationship with the Group's external stakeholders based on trust and mutual respect. DP World will strive, where practicable, to ensure that information is communicated transparently and that any impacts and corresponding agreed mitigating actions are managed fairly and in line with legislative requirements. The nominated resources at both project and BU levels will be tasked with coordinating information disclosure in a manner deemed appropriate.

## d) Stakeholder Consultation

Consultation is a dialogue process, and DP World aims to initiate and sustain constructive external relationships.

## e) Negotiation & Partnership

DP World looks upon negotiation and partnership as part of effective stakeholder consultation. Once parties have become acquainted and trust established, discussions will devolve into questions of roles, responsibility in the mid to long term and mutually beneficial outcomes based on the relationship between parties going forward.

## f) Grievance Management

A grievance is a complaint or concern raised by an individual or organisation who feels they have been adversely affected by DP World's operations. This may be presented at the corporate, business unit or project level and during any stage of its development. Grievances may be specific complaints for actual damages, injury or general concerns about activities, incidents and real or perceived impacts.

An essential requirement of global best practice standards, including the IFC Performance Standard 1, is establishing and communicating an effective, adequate and appropriate grievance mechanism for external stakeholders. This helps to facilitate effective channels of communication. It is an essential tool to help establish an open dialogue with DP World's global community, local communities and respective project-affected persons at the BU level.

Collectively, DP World's Global Whistleblower Policy, its local/regional variants and the associated Global Hotline make up an effective **community feedback mechanism** that provides a structured mode of receiving and resolving feedback and grievances at a corporate, BU and project level. Complaints are addressed transparently, and the mechanism is made readily available to all population segments at no cost and with no fear of retribution. While the size and reach of the mechanism may vary across projects and/or BU, it aims to reflect the scale of impacts and risks to external stakeholders. Significantly, the mechanism does not impede access to other judicial or administrative remedies and does not replace any legal processes, existing employee grievance systems, regular business-to-business dialogue, or other management procedures already in place; it is only one of the practical options for reporting, pursuing and resolving a grievance available to external stakeholders.

To help maintain the integrity of DP World's Grievance Mechanisms, The Group has drawn from the "effectiveness criteria" identified by the United Nations Guiding Principles (UNGP) on Business and Human Rights:

1. **Legitimate:** it must have a clear, transparent, and sufficiently independent governance structure to ensure that no party to a grievance process can interfere with the fair conduct of that process.
2. **Accessible:** it must be publicised to stakeholders who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers to access, including language, literacy, awareness, finance, distance, or fear of reprisal.
3. **Predictable:** it must provide a clear and known procedure, with time frames for each stage, clarity on the types of process and outcomes it can (and cannot) offer and means of monitoring the implementation of any outcome.
4. **Equitable:** it must ensure that aggrieved stakeholders have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms.

5. **Rights-compatible:** it must ensure that mitigation measures and remedies accord with internationally recognised human rights standards; and
6. **Transparent:** it must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

#### g) Stakeholder Involvement in Project Monitoring

DP World aims to actively involve stakeholders through a ‘participatory monitoring’ process to maintain good faith interactions and a healthy long-term relationship with external stakeholders. This process helps better understand commonly identified challenges and project impacts and improves the approach to stakeholder engagement.

#### h) Reporting to Stakeholders

For the Group to maintain a healthy working relationship with its external stakeholders, updates should be provided by the external stakeholder engagement to allow PAPs, local communities and other stakeholders to understand how their comments have influenced decision-making. As its approach to external stakeholder engagement becomes more mature, DP World will adopt a ‘follow-through’ process to ensure that these comments, criticisms and suggestions are handled through to completion. Eventually, this will demonstrate how comments have been taken on board, what impact mitigation measures are being monitored and the proposed next steps. It will help to maintain organisational accountability and mitigate project impacts in the long term.

#### i) Management Functions

As part of DP World’s corporate approach to external stakeholder engagement, roles and responsibilities are essential to ensure the effective upkeep of stakeholder engagement mechanisms and broader management systems. Therefore, DP World will ensure all responsible persons are educated and aware of their responsibilities by conducting webinars, awareness sessions and “log-in & learns” with DP World’s senior management, regional and functional management, GRPA Leads, Group Sustainability Leads, sustainability champions and other project/BU-level responsible persons.

Additional resources, including workshops and toolkits, will be developed to help socialise the forthcoming internal SOPs, with specific insights on managing environmental and social compliance requirements provided by Group Sustainability.



## Business Unit-Specific Stakeholder Engagement Plans

This External Stakeholder Engagement Policy is expected to be referenced when developing BU-Specific Engagement Plans (SEP). Projects will also be expected to develop SEPs (usually as part of the site-specific Environmental & Social Management Plans). They will graduate into a BU-specific SEP as the project matures. The key aim of any SEP is to:

- Clarify the roles and responsibilities for leading engagement with relevant and affected stakeholders at each phase of the project, particularly the role of government officials, service providers, and DP World regarding each objective outlined below at each project stage.
- Identify stakeholders and map their perceptions about the Project, including their relevance, influence, and any issues and concerns they may have.
- Introduce the Project and share project information with stakeholders, explaining its nature and potential impacts clearly and sufficiently.
- Advise stakeholders of the opportunities to contribute to the project implementation and support any mitigation and enhancement measures.
- Provide relevant stakeholders with the opportunity to comment or share ideas on issues that may be addressed in the Environmental Impact Assessment (EIA).
- Record feedback, close out any grievances that may arise through a formal feedback mechanism and ensure that stakeholders are aware of other informal channels available to lodge grievances.
- Demonstrate the Project's commitment to national requirements, international guidelines, and best practices.
- Lay the foundation for ongoing and positive stakeholder participation in the Project.

The SEP should be tailored and proportional to the risks and impacts of the Project and/or BU, as well as the phase of development, and should encompass the following key aspects:

- Make relevant project documentation readily available to Affected Communities and, where applicable, other stakeholders in the local language and in a culturally appropriate manner.
- The process should consider the needs of disadvantaged and vulnerable groups.
- Disclosure of relevant environmental or social risks and impacts should occur early in the assessment process, before the Project construction commences, and on an ongoing basis.
- The feedback of the stakeholder engagement process should be assessed by the Project team and considered where appropriate in the Project development plan.
- The process should be anonymised and free from manipulation, interference, coercion, and intimidation.

Implementing the External Stakeholder Engagement Policy means that:

- External stakeholder engagement will be incorporated into the project cycle for greenfield, brownfield and acquisition projects.
- Projects will develop an approach to stakeholder engagement and engagement planning at the earliest feasible stage of the project cycle, where practicable.
- A "stakeholder map" will be drawn based on characteristics, location and critical issues identified by the Project or BU Team.
- Project/BU SEPs will be available to stakeholders in accessible formats.
- Stakeholder engagement (and the SEP) will be incorporated into the Project Environmental Social Management System (ESMS) and Environmental Social Management Plan (ESMP).
- All projects will report on external stakeholder engagement activities and feedback as part of their project management reporting.

To assist and ensure the needs of the SEP are effectively met, team members from GRPA and Group Sustainability will participate in new project scoping discussions, helping to initiate external stakeholder engagement from project conception and providing additional support to the respective teams on the ground.

## Oversight, Monitoring & Reporting

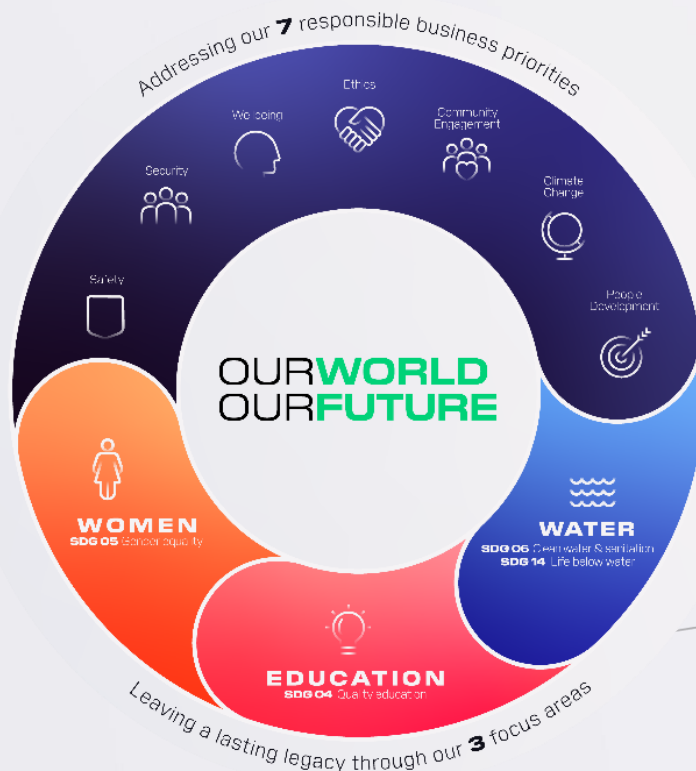
At a management level, the Executive Sustainability Council, comprised of senior stakeholders from across the Group, oversees this Policy. The Council is briefed regularly regarding external stakeholder engagement activities and progress.

At a project/BU level, a dedicated resource (reporting to the Project Manager or BU Head, respectively) is responsible for driving the development and implementation of effective external stakeholder engagement by developing a SEP and using this External Stakeholder Engagement Policy, along with the complementary internal SOPs, as a reference.

To measure the effectiveness of engagement activities, a regular review of asset-level SEPs and community feedback mechanisms' will be conducted and reported to the Council for each project. The evaluation aims to assess whether external stakeholder complaints and suggestions are correctly classified, identify comment trends, and address them promptly. Further details on role and responsibility are found in the internal SOPs complementing this global policy.

## Sustainability Strategy

Working sustainably and responsibly is integral to the Group's global operations and is guided by DP World's **Our World, Our Future** sustainability strategy. This ensures responsible business practice is embedded in every aspect of the Group's work.



### Figure 1: Our World, Our Future Strategy

Developed in 2019, the strategy is based on a Group-level materiality analysis aligned with global best practices. This materiality assessment identified relevant topics from two perspectives – their importance to our stakeholders and their significance to DP World. Therefore, even at a high level, DP World has taken steps to ensure its stakeholders have been considered. This has allowed the Group to meaningfully invest in, build up and continuously work to preserve its social license to operate with community stakeholders, government partners and strategic collaborators.

DP World's commitments to external stakeholder engagement are to:

- Communicate sustainability performance openly and transparently to relevant external stakeholders.
- Protect the environment by preventing, reducing or mitigating impacts, including the responsible use of natural resources and emissions reduction.
- Help maintain existing social networks and effectively contribute to civil society.
- Engage with relevant/affected external stakeholders in constructive communications and dialogue.
- Act as a “good neighbour” in host communities.
- Invest in embracing diversity, encouraging personal development, and providing the tools to drive change.
- Ensure the safety of affected stakeholders by striving for zero harm at work.
- Build vibrant and resilient societies through strategic investment in issues affected by DP World's operations.

## **Conclusion**

DP World views this External Stakeholder Engagement Policy as essential to its global operations and an integral aspect of its approach to external stakeholder management. The policy has set out high-level aims, considerations and commitments that the Group's ecosystem of projects and BU's will uphold and adhere to, as appropriate. This includes adopting global best practices, legislative mandates, regulatory requirements, governmental expectations, and industry recommendations where feasible.

This policy represents a statement of intent for the Group to uphold external stakeholder engagement practices consistent with the Group's beliefs and commitments and as a guidance document to be referenced in the future.

This policy will be revised periodically per the policy review guidelines set out by DP World.

## **Related Standards, Policies and Processes**

As mentioned in the Section titled “Policy Scope & Overview”, this policy document is explicitly concerned with ‘external stakeholder’ engagement as defined by the IFC. Therefore, for a more comprehensive reading of DP World's approach to both internal and external stakeholder engagement, please read this policy in conjunction with the following documents:

Policy Name	Responsible Department
Government Relations & Public Affairs Policy	GRPA/Group Communications
Group Human Rights Policy	Group Sustainability
Group Sustainability Policy	Group Sustainability
DP World Global Whistleblowing Policy	Group Corporate Secretariat
Group Procurement Policy	Group Procurement
DP World Vendor Code of Conduct	Group Procurement
DP World Global Internal Communications	Group Communications
DP World Global Social Media Policy	Group Communications
DP World Global Inclusion & Diversity Policy	Group People
DP World Global Code of Ethics	Group People
Group Planning & Project Management Policy	Group Planning & Project Management

## Definitions and Terms

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

IFC	International Finance Corporation
IFC PS	IFC Performance Standards
IFC Stakeholder Engagement Good Practice Handbook	IFC Stakeholder Engagement Good Practice Handbook for Companies Doing Business in Emerging Markets
UNGP	United Nations Guiding Principles on Business & Human Rights
SOPs	Standard Operating Procedures
ILO	International Labour Organisation
PAP	Project Affected Persons
SEP	Stakeholder Engagement Plan
NGO	Non-Governmental Organisation
CSO	Civil Society Organisation
The Group	DP World Limited and its subsidiaries
Business Unit	A DP World division operating independently and responsible for its P&L but adhering to Group policies and commitments. This term is used throughout the policy for all DP World assets, whether in the conception, design, construction, or operational phase.
GRPA	Government Relations & Public Affairs: Group function responsible for leading the engagement with governments and civil society through enduring relationships built on trust and mutual value.
BU	Business Unit; A DP World division that operates independently and is responsible for its own profit & loss, but ultimately adheres Group level policies and commitments.

<b>Project</b>	A 'project' refers to DP World operations in the design/construction phase and not yet operational.
<b>'Internal' Stakeholders</b>	Stakeholders that are a part of the 'core business function' and subject to national regulations as well as existing corporate policies and procedures (e.g., Supplier Code of Conduct, Procurement Policy etc.)
<b>'External' Stakeholders'</b>	Stakeholders that are external to DP World's 'core business function'. These are stakeholders impacted by the business and its actions, not as part of its operations.

## History

Version Number	Review Date	Summary of Changes
1	13/04/2023	First draft
2	29/05/2023	GRPA Revision

This Policy has been developed by GRPA & Group Sustainability and is subject to annual review.

Approved by: Group Chairman and CEO  
Department: GRPA/Group Communications  
Revision Number: 1  
Revision Date: 28/08/2023