

Modern Slavery and Human Trafficking Policy



DP WORLD

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Introduction

Modern slavery is a violation of fundamental human rights and a criminal offence under the legislation of many countries. It constitutes the deprivation of one person's liberty by another to exploit them for personal or commercial gain.

The term “modern slavery” includes trafficking in persons, slavery, slavery-like practices (including forced labour, debt bondage and forced marriage) and the worst forms of child labour.

DP World is committed to acting ethically and with integrity in all its business dealings and relationships and is committed to putting measures in place to prevent modern slavery and human trafficking that may exist within the Group’s operations and supply chain globally.

This includes putting measures in place to identify and address modern slavery risks both within our own operations and within our entire supply chain. We also expect all parties in our supply chain to share this commitment.

DP World publish an annual Modern Slavery Statement as required by the relevant Acts.

Purpose

The purpose of this policy is to mitigate the risks associated with any act of modern slavery and human trafficking within the Group and its suppliers by clearly stating the position of DP World with regards to both modern slavery and human trafficking and the actions which might result due to any violation of the same.

Scope

This Modern Slavery and Human Trafficking policy (“Policy”) applies to all DP World employees and all organisations in DP World’s supply chain, including third party providers of goods or services (suppliers), to comply with this Policy.

It does not form part of a DP World employee’s employment contract or procurement related supplier contract, unless specifically noted in such contracts, and does not create contractual rights or obligations.

This Policy may be amended or withdrawn by DP World at any time.

Policy

1. Minimum labour standards

DP World takes steps to ensure that none of its employees, JV partners or suppliers impose or knowingly facilitate the imposition of forced or compulsory labour for DP World’s ultimate benefit. DP World treats its workers with the utmost dignity and respect and upholds the highest standards of human rights (including the right to freedom of association, where required by law in the relevant jurisdiction). All applicable laws and regulations relating to work and the workplace (including those relating to the payment of wages and compensation and working hours) must be complied with.

Under no circumstances should any of the following occurrences be tolerated within its own operations or in the operations of its suppliers or customers, including the following:

- failure to provide a written contract to workers in a language that they understand;

- withholding of workers' original government-issued identification and travel documents except where doing so is required by law. In such cases, workers should always understand how to request the return of their documentation;
- imposition of unreasonable restrictions on movement within or upon entering or exiting the workplace or other work-related facilities including through debt bondage, sweatshops, physical restraint and other methods of control and coercion;
- use of child labour and/or the engagement of any workers who are younger than the legal minimum age for employment in the relevant jurisdiction;
- withholding of workers' salaries or deduction of money from wages for reasons beyond their control, unless under court-mandated instruction;
- forcing workers to work to pay off a debt;
- prohibition against taking entitled holiday (whether paid or unpaid). DP World reserves the right to have leaves planned for operational reasons;
- failure to provide adequate training, including necessary health and safety training, and protective clothing or equipment;
- forcing workers to work longer hours than set out in their contracts without choice and appropriate compensation; and
- retribution against workers who make complaints/ reports about their treatment.

2. Identification and assessment of the risks of modern slavery practices

DP World's Group Procurement department shall ensure that tenderers' compliance with applicable modern slavery and human trafficking legislation, regulations and codes is factored into procurement decision-making across all global business units.

Based on the DP World's standardised pre-qualification process, procurement departments across all global business units shall be responsible to ensure vendors' compliance with the Vendor Code of Conduct and this policy, prior to pre-qualification and inclusion to the approved vendor list.

Policy compliance will be reviewed through existing methods such as the annual Group policy compliance self-assessments submitted by business units and Regional Management. In addition, compliance with the policy may be assessed by the Group Compliance function. Compliance may also be assessed as part of an internal audit performed at a particular business unit.

3. Action to be taken if a supplier is found to have been involved in modern slavery

DP World takes violations of this policy seriously, and strongly encourages its suppliers to comply with its terms. Where a non-compliance is identified and reported, DP World expects its suppliers to implement appropriate corrective actions promptly.

DP World reserves the right to take such action as it deems appropriate in relation to a breach of this Policy including, without limitation, reporting of the practice to the relevant authorities and exercising any contractual right of termination.

4. Contractual obligations and due diligence requirements

DP World will seek to include provisions in its commercial agreements with third parties to provide it with appropriate comfort that the relevant counterparty conducts its business and operations in a manner that is consistent with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force from time to time.

DP World contracts will include a clause that enable it to terminate the agreement in circumstances where the supplier or customer is unable or unwilling to achieve full compliance with the Minimum Standards.

5. Training

A training module has been developed on the indicators of modern slavery and human trafficking which all DP World email network users are required to complete upon joining the Group. Information on modern slavery and human trafficking is also being provided to frontline employees workers at operational briefings, where appropriate, and in pictorial form by providing awareness posters.

6. Reporting

If any party subject to this policy at any time discovers or suspects the existence of modern slavery or human trafficking in any part of DP World’s operations or global supply chain, the situation shall be reported to the DP World Whistleblowing Hotline:

Online - external: www.dpworld.com/whistleblowing-hotline

Online - company intranet: See DP World Connexions or Business Unit intranet as applicable.

Telephone: Freephone number as publicised on intranet, websites, and within DP World premises in each country of operations.

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

DP World
 Group Internal Audit Department
 Attention: Head of Fraud Risk Services
 PO Box 17000
 Jebel Ali Free Zone
 Dubai, UAE

Direct Reporting: All staff have the option of reporting direct to their respective business unit line manager, or please approach the Group Head of Fraud Risk Services or a member of the Fraud Risk Services team within Group Internal Audit at:

Group Internal Audit Department
 4th Floor, Building 17
 DP World
 Dubai, UAE
 Jebel Ali Free Zone

Related Standards, Policies and Processes

This policy should be read in conjunction with the Global Whistleblowing policy.

Definitions and Terms

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

DP World	DP World Limited and all associated subsidiaries.
Group	DP World Limited and all associated subsidiaries.
JV	Joint Venture.

History

Version Number	Review Date	Summary of Changes
V1.0	01/10/2018	Overall policy layout change. Including new clauses to be part of the contract review covering Modern Slavery and Human Trafficking (Section 4.4).

V2.0	14/03/2017	Section 4.2 – wording amended covering internal audit scope.
V3.0	19/02/2019	Annual review with the adoption of the new policy template.
V4.0	10/03/2020	<p>Annual review.</p> <p>Amending the 2 clauses under section 4.1 to read:</p> <ul style="list-style-type: none"> withholding of workers’ salaries or deduction of money from wages for reasons beyond their control, unless under court-mandated instruction; prohibition against taking entitled holiday (whether paid or unpaid). DP World reserves the right to have leaves planned for operational reasons; <p>Adding the below clause under section 4.2: “Policy compliance will be reviewed through existing methods such as the annual Group policy compliance self-assessments submitted by business units and Regional Management. In addition, compliance with the policy may be assessed by the Group Compliance function. Compliance may also be assessed as part of an internal audit performed at a particular business unit.”</p>
V5.0	18/03/2021	<p>Adding the following content to clause 2:</p> <ul style="list-style-type: none"> “The term “modern slavery” includes trafficking in persons, slavery, slavery-like practices (including forced labour, debt bondage and forced marriage) and the worst forms of child labour (including using children for prostitution or in hazardous work). <p>This includes putting measures in place to identify and address modern slavery risks both within our own operations and within our entire supply chain. We also expect all parties in our supply chain to share this commitment.</p> <p>DP World will also publish an annual Modern Slavery Statement as required by the relevant Acts.”</p> <p>Amending Clause 3 to read:</p> <ul style="list-style-type: none"> “This modern slavery and human trafficking policy (“Policy”) applies to all DP World employees and all organisations in DP World’s supply chain, including third party providers of goods or services (suppliers), to comply with this Policy. It does not form part of a DP World employee’s employment contract or procurement related supplier contract, unless specifically noted in such contracts, and does not create contractual rights or obligations.”

	<p>Amending the following wording under clause 4.1:</p> <ul style="list-style-type: none">• “Original wording “Under no circumstances should any of the following occurrences be tolerated” revised wording “Under no circumstances should any of the following occurrences be tolerated within its own operations or in the operations of its suppliers or customers, including the following:”• Original wording “imposition of unreasonable restrictions on movement within or upon entering or exiting the workplace or other work-related facilities” revised wording “imposition of unreasonable restrictions on movement within or upon entering or exiting the workplace or other work-related facilities including through debt bondage, sweatshops, physical restraint and other methods of control and coercion;” <p>Amending the title of clause 4.2 from: “Investigation and remediation of modern slavery and human trafficking” to read “Identification and assessment of the risks of modern slavery practices”</p> <p>Adding the following wording under clause 4.1:</p> <ul style="list-style-type: none">• “forcing workers to work to pay off a debt;” <p>Amending clause 4.3 to read:</p> <ul style="list-style-type: none">• “DP World takes violations of this policy seriously, and strongly encourages its suppliers to comply with its terms. Where a non-compliance is identified and reported, DP World expects its suppliers to implement appropriate corrective actions promptly. DP World reserves the right to take such action as it deems appropriate in relation to a breach of this Policy including, without limitation, reporting of the practice to the relevant authorities and exercising any contractual right of termination. ” <p>Adding the following text to Clause 4.4:</p> <ul style="list-style-type: none">• “DP World contracts will include a clause that enable it to terminate the agreement in circumstances where the supplier or customer is unable or unwilling to achieve full compliance with the Minimum Standards.” <p>Reflecting the below amendments under clause 5:</p> <ul style="list-style-type: none">• Replacing “Fraud Response Team” with “Fraud Risk Services team”.• Updating the Whistleblowing Hotline.
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V6.0	16/02/2022	<ul style="list-style-type: none">• Updating the Whistleblowing contact details.• Updating the policy in the new template.
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This Policy has been developed by Group Corporate Secretariat and is subject to annual review.

Approved by: Group Chairman and CEO
Department: Group Corporate Secretariat
Revision Number: V6.0
Revision Date: February 2022

**ALL QUERIES IN RELATION TO THIS
POLICY SHOULD BE DIRECTED TO
GROUP CORPORATE SECRETARIAT AT**

mailto: secretariat@dpworld.com