

External Stakeholder Engagement Policy



DP WORLD

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Introduction

DP World is committed to building and maintaining a sustainable future, attaining operational excellence and maintaining its position as a responsible partner. As a global organisation, with an intricate value chain, DP World's operational impacts 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 varying interest in how business is conducted. Responding to external stakeholder needs, in a manner that best suits the respective stakeholder group, 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.

Working in a sustainable and responsible way is integral to the Organisation'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.

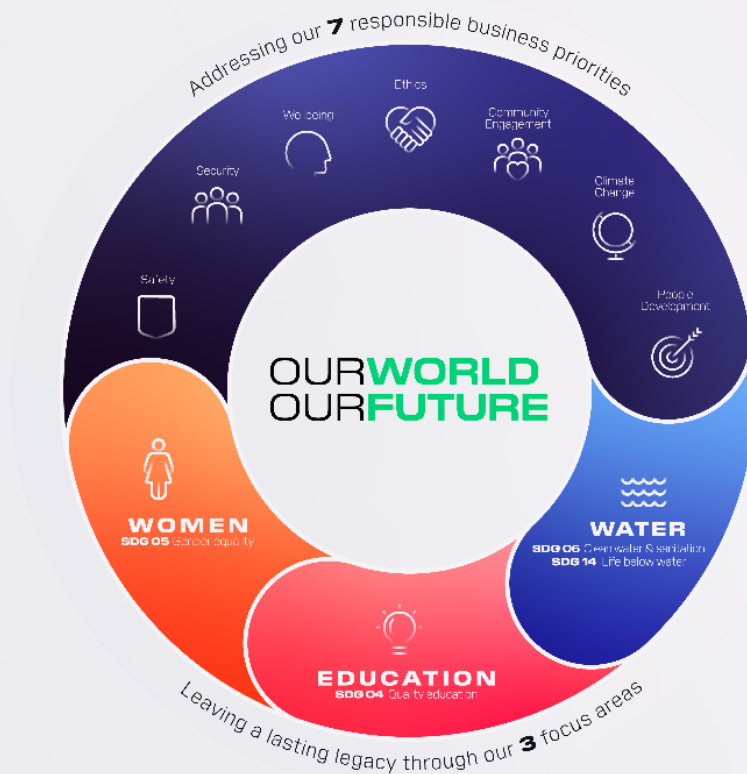


Figure 1: Our World, Our Future Strategy

The Strategy was developed in 2019 and is based on a materiality analysis conducted at the Group level, which is in line with global best practices. This materiality assessment identified topics that were relevant from two perspectives – its importance to the Organisation's stakeholders and its importance to DP World. Therefore, even at a high-level, it is apparent that DP World has taken steps to ensure its stakeholders have been considered across its operations. This has allowed the Organisation to meaningfully invest in, build up and continuously work to retain its social license to operate with community stakeholders, government partners and strategic collaborators alike.

DP World's commitments to external stakeholder engagement are:

- To communicate sustainability performance openly and transparently to all relevant/affected external stakeholders.
- To protect the environment by preventing, reducing or mitigating impacts, including the responsible use of natural resources and reduction of emissions.
- To help maintain existing social networks and effectively contribute to civil society.
- To engage with relevant/affected external stakeholders in constructive communications and dialogue.
- To be a “good neighbor” in host communities.
- To invest in embracing diversity, encouraging personal development, and providing the tools to drive change.
- To ensure the safety of affected stakeholders by striving for zero harm at work
- To build a vibrant and resilient society through strategic investment in the issues impacted those by DP World and its operations.

Policy Scope & Overview

This policy focuses on DP World (and all of its subsidiaries) approach to External stakeholder engagement and concerns the Group's approach to 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) are already embedded in other corporate policies that are now well-established governance documents and so are out of the scope of this document.

This External Stakeholder Engagement Policy not only discloses DP World's approach, but also acts as a guidance document for the whole Organisation; 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 and will be complemented by a set of internal Standard Operating Procedures (SOPs). Together, this policy and the SOPs will help the Organisation establish context-specific Stakeholder Engagement Plans (SEPs) at the project and/or business unit (BU) level. Further information on which is available in the section titled “Business Unit-Specific Stakeholder Engagement Plans” in this policy document. 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 makes clear that approach to external stakeholder engagement will vary on a case-by-case basis. Group Sustainability will work with teams on-the-ground to ensure that minimum requirements are met, but 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 and ILO as well as the IFC and World Bank). It is also based on a peer benchmarking exercise that has provided useful insights on 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 document mandates an approach to external stakeholder engagement activities that is balanced, proportionate and practicable.

Policy Objectives

The External Stakeholder Engagement Policy is focused on external stakeholders; this includes project affected persons (PAPs), local communities, government authorities, local institutions, NGOs and Civil Society organisations, among other external 3rd parties, to the extent that they are impacted by DPW activities.

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 has drawn 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 Manual, 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, 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.) - recognize and accommodate unequal power relations.
- **Appropriate:** engagement activities should be developed in a manner that respects local norms and accommodates 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 in a timely manner to enable them to engage in meaningful consultation.
- **Continuous:** stakeholder engagement should be a continuous process – stakeholders and stakeholders' needs evolve over time.
- **Collaborative:** practice active listening and promote collaboration - seek out stakeholders' views to better understand their perspective.

Approach to Stakeholder Engagement

As aforementioned, 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 organisational approach to stakeholder engagement. This policy introduces a high-level overview found in the subsections (a) - (h) below.

a) Roles and responsibilities for engaging stakeholders

DP World understands that while Group Sustainability is custodian of the policy and has been tasked with socializing it across the Organisation, meaningful implementation will primarily occur at the project and BU levels. Therefore, Group Planning & Project Management and Regions will be responsible for jointly nominating a responsible resource for Green-Field projects, similarly each respective BU Team will also have allocated responsibility for Brown-Field and Operating Units accordingly. Group Sustainability will be available to support where required. These respective on-the-ground resource(s) must develop a Stakeholder Engagement Plan, outlining a governance approach to external stakeholder engagement. The implementation of this plan can then be delivered by leveraging shared Group resources, consultants and local partners.

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

Note, that DP World is sensitive to the fact that it may not always have direct oversight on how external stakeholder engagement is conducted. The Organisation's government partners may take the lead on engagement at the project design & conception stage, contractors/sub-contractors during project construction and DP World only during operations. However, the Group is committed to at least ensuring good practices, in line with IFC Performance Standard 1 & 5, will be met throughout and will actively communicate the same to its partners.

b) Stakeholder Identification, Analysis & Engagement Methods

The stakeholder identification process is the second step in DP World's external engagement approach and will help the Group and business units identify their external stakeholders. The exercise will be coordinated by a dedicated resource at the project and BU level with Group Planning & Project Management and respective Business Unit Management teams responsible for selecting this person/team of persons. A high-level overview of what this exercise may look like is provided in the table below:

Stakeholder Group	Engagement Objectives	Potential Engagement Methods
Project Affected Persons (PAPs)	<ul style="list-style-type: none">- To sensitize individuals to the project aims and associated impacts- To provide context on potential mitigation activities- To provide channels to raise queries, concerns and complaints	<ul style="list-style-type: none">- Public Consultations- Focus Groups- Surveys & Questionnaires- Community Feedback Mechanism

Communities (including Vulnerable groups)	<ul style="list-style-type: none"> - To be sensitive to vulnerable groups and to communicate accordingly - To collaborate openly, honestly, and consistently and to encourage two-way dialogue - To involve communities early in the project's lifecycle and to ensure their opinions, where practical, are considered in the decision-making - To establish a mechanism for dealing with internal/community feedback and grievances - To provide a nuanced approach to community engagement 	<ul style="list-style-type: none"> - Workshops & Focus Groups - Roundtables - Perception Survey Forums - Community Feedback Mechanism - Website and Social Media
Government Authorities & Regulatory Entities	<ul style="list-style-type: none"> - To understand regulator expectations (benchmarked against applicable laws and legal agreements in place). - To be open and transparent with regulators - Transparent communications on processes and deliverables 	<ul style="list-style-type: none"> - Workshops & Focus Groups - Roundtables - Website and Social Media
NGOs Partners & Civil Society Organisations	<ul style="list-style-type: none"> - To understand NGO expectations and where practical, consider it in the decision-making process. - To be open and transparent with NGOs - Communicating opportunities for partnerships 	<ul style="list-style-type: none"> - Workshops & Focus Groups - Roundtables - Perception Survey Forums - Public Meetings - Website and Social Media

c) Information Disclosure

The third step is to build a relationship with the Organisation's external stakeholders that is based on trust and mutual respect. DP World will strive, where practicable, to ensure information is communicated transparently, with the ambition of ensuring that any impacts and corresponding agreed mitigating actions are managed fairly and in line with national 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 two-way process of dialogue and DP World aims to initiate and sustain constructive external relationships.

e) Negotiation & Partnership

Negotiation and partnership are looked upon by DP World as part of effective stakeholder consultation. Once parties are acquainted with one another and a level of trust has been 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 that they have been adversely affected by DP World's operations. This may be at the corporate, business unit or project level and during any stage of its development. Grievances may take the form of specific complaints for actual damages, injury or general concerns about activities, incidents and impacts, or perceived impacts.

A key requirement of various global best practice standards, including the IFC Performance Standard 1, is the establishment and communication of an effective, adequate and appropriate grievance mechanism for external stakeholders. This helps to facilitate effective channels of communication. It is an especially important 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 in a transparent manner and the mechanism is made readily available to all segments of the population at no cost and with no fear of retribution. While the size and reach of the mechanism may vary across project and/or BU, it aims to be reflective of the scale of impacts and risks to external stakeholders. Importantly, the mechanism does not impede access to other judicial or administrative remedies, and does not replace any legal processes, existing employee grievance systems, normal business-to-business dialogue, or other management procedures already in place; it is only one of the effective 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 outcome 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

In order to maintain good faith interactions and a healthy long-term relationship with external stakeholders, DP World aims to actively involve stakeholders through a process of 'participatory monitoring'. This will help to better understand commonly identified challenges and project impacts and improve the taken approach to stakeholder engagement.

h) Reporting to Stakeholders

For the Organisation to maintain a healthy working relationship with its external stakeholders, updates should be provided, by the external stakeholder engagement resource appointed by Group Planning & Project Management or BU/Region's respectively, 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 process of 'follow through' to see that these comments, criticisms and suggestions are handled through to completion. Eventually, this will include exhibiting how comments have been taken on board, what impact mitigation measures are being monitored and what proposed next steps might be. 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 to ensure the effective up-keep of stakeholder engagement mechanisms and wider management systems are essential. Therefore, DP World Group Sustainability will ensure all responsible persons are educated and aware of their respective individual responsibilities by conducting webinars, awareness sessions and "log-in & learns" with DP Worlds senior management, regional management, sustainability champions and other project/BU-level responsible persons.

Business Unit-Specific Stakeholder Engagement Plans

As aforementioned, it is expected that this Stakeholder Engagement Policy will be referenced as a guidance document when developing BU-specific engagement plans (SEP). Note, that projects will also be expected to develop SEPs (usually as part of the site-specific Environmental & Social Management Plans) and will graduate into a BU-specific SEP as the project matures. The key objective 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 in respect of each objective outlined below, at each stage of a project.

- 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 in clear and sufficient detail its nature and potential impacts.
- Advise stakeholders of the opportunities to contribute with the project implementation and support any mitigation and/or 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 and close out any grievances that may arise through a formal feedback mechanism and ensure that stakeholders are aware that other informal channels are available to lodge grievances.
- Demonstrate the Project's commitment to national requirements and international guidelines and best practice.
- Lay the foundation for ongoing and positive stakeholder participation for the Project.

The SEP should be tailored and commensurate 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 relevant 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, in any event 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 anonymized, free from external manipulation, interference, coercion, and intimidation.

Oversight, Monitoring & Reporting

At a management level, the Executive Sustainability Council, which is comprised of senior stakeholders from across the Group, will be responsible for providing oversight of this Policy. The Council will be briefed on a regular basis regarding stakeholder engagement activities and progress.

At a project/BU level, a dedicated resource (reporting to the Project Manager or BU Head respectively) will be made 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 SEP's and community feedback mechanisms' will be conducted and reported to the Council for each project. The purpose of the review is to: assess whether external stakeholder complaints and suggestions are correctly classified; identify trends in comments; and ensure comments are being addressed in a timely manner. Further details on role and responsibility will be found in the internal SOPs that complement this global policy.

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 document has set out high-level aims, considerations and commitments that the Organisation's ecosystem of projects and BU's will uphold and adhere to, as seen fit. This includes adopting global best practices, legislative mandates, regulatory expectations and industry recommendations where feasible.

This policy document will be revised periodically in line with the policy review guidelines as set out by DP World.

Overall, DP World views this document as not only a statement of intent for the organisation to uphold external stakeholder engagement practices that are consistent with the Group's beliefs and commitments, but also as a guidance document to be referenced going forward.

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 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 Organisation	DP World Limited and all its subsidiaries
The Group	DP World Limited and all its subsidiaries
Business Unit	A DP World division that operates independently and is responsible for their own profit & loss, but ultimately adhere Group level policies and commitments. This term is used throughout the document for all DP World assets, irrespective of whether it is in the conception, design, construction, or operational phase.

BU	Business Unit; A DP World division that operates independently and is responsible for their own profit & loss, but ultimately adhere Group level policies and commitments.
Project	A 'project' refers to all DP World operations that are still in the design/construction phase and not yet operational.
'Internal' stakeholders	All stakeholders that are a part of the 'core business function' and are subject to national regulations as well as pre-existing corporate policies and procedures (e.g. Supplier Code of Conduct, Procurement Policy etc.)
'External' stakeholders'	All stakeholder 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.
'document'	The External Stakeholder Engagement Policy (this policy)