

**DECLARATION OF  
BASIC PRINCIPLES  
FOR THE  
PROTECTION OF  
HUMAN RIGHTS  
AND THE  
ENVIRONMENT**



**DP WORLD**

# Table of contents

INTRODUCTION .....	3
OUR COMMITMENT TO RESPECT HUMAN RIGHTS AND THE ENVIRONMENT .....	3
STANDARDS AND GUIDELINES .....	3
RELEVANT HUMAN RIGHTS ISSUES.....	4
Prohibition of child labour .....	4
Prohibition of slavery, forced labour, human trafficking .....	5
Equal opportunities and protection against discrimination .....	5
Appropriate remuneration for work performance.....	5
Working time.....	5
Education and training .....	5
Protection of local communities and indigenous peoples .....	6
Security personnel and human rights protection .....	6
Health and safety at work .....	6
Freedom of association, right to collective bargaining and right to strike .....	6
Handling data.....	6
Protection of the environment.....	7
STRUCTURE AND RESPONSIBILITIES .....	9
RISK ANALYSIS .....	9
PREVENTION MEASURES.....	10
GRIEVANCE MECHANISM .....	10
ACCESS TO REMEDY.....	11
EFFECTIVENESS CONTROL .....	11
MANDATORY ANNUAL REPORTING .....	11
FURTHER DEVELOPMENT OF THE DUE DILIGENCE PROCESSES.....	11
CONTACT FOR QUESTIONS AND INFORMATION .....	11
FINAL PROVISIONS.....	12

# INTRODUCTION

This Declaration, which has been developed in alignment with the DP World Human Rights Statement, sets forth DP World Logistics Germany B.V. & Co. KG and its affiliates, herein after referred to as the “Company”, basic principles for the protection of human rights and the environment, in line with the requirements of the German Supply Chain Due Diligence Act.

## OUR COMMITMENT TO RESPECT HUMAN RIGHTS AND THE ENVIRONMENT

In alignment with the Group, the Company is committed to respecting human rights and the environment and to taking responsibility for its supply and value chain. We are therefore committed to respecting human rights and the environment in our own operations and in our global supply chains, and to ensuring that human rights and environmental abuses are prevented and that those affected have access to remedy.

### STANDARDS AND GUIDELINES

At a Group level, DP World is a signatory to the United Nations Global Compact (UNGC) and its ten principles, which encompass human rights, labour, the environment, and anti-corruption. DP World respects and support the dignity, wellbeing and human rights of its employees, and the workers in our extended supply chain. DP World acts to create and maintain a culture that promotes human rights in its business practices and relationships with its employees, supplier, communities, and other stakeholders.

At DP World, we respect internationally recognised human rights and pay particular attention of the rights of vulnerable groups. In addition to the ten principles of the UNGC, we are committed to following international standards, among others:

- United Nations Universal Declaration of Human Rights;
- United Nations Guiding Principles on Business and Human Rights; and
- Core labour standards of the International Labour Organizations (ILO) on labour and social standards.

Through the Company, we are also committed to the below which are requirements under the German Supply Chain Due Diligence Act:

- OECD Guidelines for Multinational Enterprises<sup>1</sup>;
- Minamata Convention on Mercury;
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention); and
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes.

This Declaration should also be read in conjunction with the following policies which form the basis of our actions:

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<sup>1</sup> Chapter IV on human rights in the OECD Guidelines for Multinational Enterprises.

- Code of Ethics of DP World;
- Gender diversity statement;
- Human Rights Statement;
- Modern slavery and human trafficking policy;
- Vendor Code of Conduct;
- Group Health, Safety and Environment Policy;
- DP World External Stakeholder Engagement Policy;
- DP World's Whistleblowing Policy; and
- DP World's Procurement Policy.

This Declaration applies to all the Company's employees<sup>2</sup> in all business units and subsidiaries. These standards require all employees to behave appropriately and lawfully towards colleagues, business partners and suppliers. We expect our business partners and suppliers to share our commitment to human rights and the environment, to implement due diligence processes and to communicate our expectations to their own service providers and suppliers.

DP World only deals with vendors who agree to adopt and adhere to the DP World Vendor Code of Conduct. DP World shall monitor the performance of vendors and will take necessary action if there is non-compliance or breaches of the Code.

## RELEVANT HUMAN RIGHTS ISSUES

Human rights are universal and every person around the world deserves to be treated with dignity and equality. Basic rights include (but are not limited to) privacy, health, life, liberty, and security, as well as an adequate standard of living. Businesses have minimum responsibilities to meet to respect human rights. They must act diligently to avoid infringing the rights of others and address any negative impacts associated with their operations. In addition, businesses can go beyond minimum requirements and make voluntary, positive contributions to support human rights.

DP World is committed to maintaining a culture that respects and promotes the human rights of its employees, its extended supply chain and the communities which surround it.

DP World releases its Modern Slavery and Human Trafficking Statement annually, outlining its commitment to ensure that slavery, servitude, forced labour and human trafficking is not tolerated in its operations or adopted within its supply chain.

DP World attaches particular importance to respect for human rights and good working conditions, both within our own Group companies and among our suppliers and business partners. We are committed to respecting internationally recognised human rights and oppose any exploitative working conditions.

In particular, DP World supports the following human and environmental rights:

### Prohibition of child labour

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<sup>2</sup> Hereinafter referred to as "employees"; "employees" also includes executives and directors

DP World is strictly opposed to all forms of child labor as defined by the relevant ILO conventions<sup>3</sup> and are committed to the effective abolition of child labour. All employer practices at DP World must at least comply with the aforementioned ILO conventions. The dignity of children must be respected. Their health and safety must be ensured.

### **Prohibition of slavery, forced labour, human trafficking<sup>4</sup>**

DP World is strongly opposed to forced or compulsory labour and any form of slavery, including modern forms of slavery and human trafficking. DP World releases its Modern Slavery and Human Trafficking Statement annually, outlining its commitment to ensure that slavery, servitude, forced labour and human trafficking is not tolerated in its operations or adopted within its supply chain.

### **Equal opportunities and protection against discrimination**

DP World is an equal opportunity employer and is committed to creating a culture free from any form of discrimination and harassment<sup>5</sup>. In line with its commitment to the UN Sustainable Development Goals (SDG's) and specifically, SDG Goal 5: Gender Equality, DP World has developed a Gender Equality Statement, which provides a clear vision for every business unit on how to approach gender equality and drive progress on a global scale.

We appreciate the diversity of our employees because it makes us stronger, more flexible and is an essential element to our success. We support and foster an inclusive environment that embraces diversity of all kinds, including a variety of backgrounds, thoughts, perspectives, demographics, ethnicities, and origins.

### **Appropriate remuneration for work performance**

At DP World, we adhere to international standards, such as the principle of equal remuneration for work of equal value regardless of gender<sup>6</sup> and fair favorable working conditions<sup>7</sup>. DP World ensures that workers and employees are paid at least equal to the minimum wage established under applicable local law. The wage paid shall be sufficient to cover the basic needs of the employees. The cost of living and social security benefits in the country concerned are considered. All employees must receive at least the social security benefits prescribed by law.

### **Working time**

DP World adheres to local laws and industry standards on working hours. DP World ensures that safe and healthy working conditions prevail, that work breaks and regular paid vacations are guaranteed.

### **Education and training**

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<sup>3</sup> ILO Conventions No. 138 and No. 182

<sup>4</sup> ILO Convention No. 29, No. 105 and 2014 Protocol to the Forced Labor Convention.

<sup>5</sup> ILO Conventions No. 100, No. 111 and No. 190.

<sup>6</sup> ILO Convention No. 100

<sup>7</sup> ILO Convention No. 100 and No. 111



DP World promotes the education and training of all its employees, because only well-trained people can contribute to DP World's success.

## Protection of local communities and indigenous peoples

At DP World, we respect the rights of local communities and indigenous peoples that might be affected by operations at our sites<sup>8</sup> and keep under the constant review the local impacts of our business activities.

## Security personnel and human rights protection

Security is a critical function to keep DP World's employees and operations secure. All security processes and procedures (including those conducted by contracted security teams) are conducted in a manner that is respectful of human dignity and human rights. DP World's security team uses a combination of technology and best practice in its methods of screening and detection. When, and if necessary, a graduated and controlled response is practiced in line with local and international standards.

## Health and safety at work

Safety is an integral part of DP World's commitment to human rights. DP World's goal is to ensure everyone goes home safe. This is accomplished through a zero-harm approach in our business. We do this by providing safe working conditions supported by relevant training, equipment, and accommodation.

## Freedom of association, right to collective bargaining and right to strike

DP World upholds workers' rights to freedom of association in jurisdictions where it is legal.

At DP World, we recognise the right of our employees to form employee representative bodies, to bargain collectively to regulate working conditions, and their right to strike, depending on applicable law.<sup>9</sup> Joining or becoming a member of a union recognized under applicable law shall not result in unequal treatment or retaliation.<sup>10</sup>

## Handling data

DP World is aware of the high sensitivity of the personal data entrusted to it by its employees, customers and business partners and protects this data by careful and responsible handling. Personal data is used and processed only to the extent permitted by laws, regulations, DP World's Data Protection Policy and the data subjects.

Data security is an important component of our business success and forms the basis of our public reputation. For this reason, DP World protects company data, customer, business partner and

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<sup>8</sup> ILO Convention No. 169.

<sup>9</sup> ILO Conventions No. 87 and No. 98.

<sup>10</sup> ILO Convention No. 135

employee data against unauthorised access, unauthorised and improper use, loss and premature destruction with all suitable and appropriate technical and organizational means available to DP World.

## Protection of the environment

At DP World, we care. Our goal is to protect and improve the environment wherever possible. Our Sustainability Strategy, "Our World, Our Future" ensures that we operate as a responsible business, prioritising sustainability and impact on the environment, people, and the communities in which we operate to achieve a better, more socially equitable and sustainable future for generations to come.

We're committed to being a world leader in sustainability and demonstrating this via reporting on the environmental, social and governance.

### Decarbonisation:

Our decarbonisation strategy cuts across five pillars: equipment electrification and efficiency, process efficiency and digitalisation, renewable energy supply, low-carbon fuel supply, and carbon compensation.

Decarbonisation is a core focus for us as a business, and we remain committed towards the transition to a Net Zero economy in line with the UAE<sup>11</sup> 2050 Strategic Initiative for Net Zero. We continue to make good progress against our ambition of achieving carbon neutrality by 2040 and Net Zero carbon emissions by 2050.

We are working closely with all partners across the value chain to maximise efficiency, electrify equipment, increase renewable electricity usage and transition to low-carbon fuels. By reducing emissions, we are playing a crucial role to minimise the environmental impact of our global operations and preserve the planet for future generations.

### Climate Change:

Furthermore, we are aware of the threats that climate change poses on our business. Accordingly, we have launched a Climate Change Asset Resiliency project to monitor and address the future impact of climate change on DP World assets. Impacts such as extreme weather events, sea level rise, or temperature fluctuations amongst other factors have been evaluated. The cross-functional Climate Change Resilience team consists of representatives from Global Operations and Engineering, Group HSE, Risk Management, Group Projects and Project Management, Group Sustainability, and Insurance.

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<sup>11</sup> UAE (United Arab Emirates)

From pushing nature-based solutions to exploring new technologies, we will use our resources to create a positive impact for the planet and our communities – without leaving anyone behind.

## **Biodiversity and Environment**

**DP World is cognisant of its responsibility to nature and in actioning solutions that help to prevent biodiversity loss across our global operations on both land and in water.**

To manage our impact on biodiversity and contribute towards the safeguarding of nature, we have publicised a Biodiversity Statement. Through this statement we commit to understanding of our impacts on biodiversity to ensure that we establish the right goals and objectives and strategies to achieve them.

### **Illegal wildlife:**

DP World cares not only for the environment, but also for the animals on our planet. DP World leads the United for Wildlife Transport Taskforce for the UAE and is committed to stopping the trade of illegal wildlife and timber products through DP World ports and terminals.

### **Ocean Health:**

Our participation in the UNGC Ocean Stewardship Coalition is a testament of our commitment to undertake a green business transition that helps preserve and protect the oceans. We recognise the importance of the UNGC Sustainable Ocean Principles and are committed to their integration in our operations. As a global leader in port and terminal management, as well as marine services, we understand the vital role oceans play in the global economy and the communities that depend on them. Our company is dedicated to promoting sustainable ocean practices and preserving ocean health for future generations. By doing so, we are contributing to the development of a blue economy that is both sustainable and economically viable.



# OUR APPROACH TO IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE

In line with the requirements of the German Supply Chain Due Diligence Act, the Company has implemented the following measures:

## STRUCTURE AND RESPONSIBILITIES

We have defined responsibilities in risk management for the implementation of and compliance with all human rights and environmental due diligence obligations. At the highest management level, our Management Board is responsible for respecting human rights and the environment in our business activities as well as in the upstream and downstream supply and value chains. In addition, we have created the position of Human Rights Officer ([menschenrechtsbeauftragter@DPWorld.com](mailto:menschenrechtsbeauftragter@DPWorld.com)), who oversees risk management and ensures operational implementation through coordination and monitoring activities. The Human Rights Officer will report to the Management Board at least once a year.

Several specialist departments, in the Company and at a Group level, are involved in the operational implementation of the human rights and environmental due diligence processes. They will allocate human resources and report on their findings regularly and as required. Risk management ensures that the human rights strategy is embedded in all relevant business processes.

## RISK ANALYSIS

Knowledge of potential human rights and environmental risks and impacts of our business activities on people and the environment along the entire value chain is an integral part of our due diligence. Using established processes, we will identify and prioritise relevant human rights and environmental risk areas and potentially affected parties from our own operations and direct business relationships.

As a first step, we have conducted an automated (AI-assisted) human rights and environmental risk analysis of our supply chain. This analysis considered the origin of the supplier, the location of its production facilities, the products and services, the purchase volume, external and officially recommended sources of risk, and self-declarations by suppliers. The final calculation of risk scores is based on the available data in all categories as defined in Section 2 of the German Supply Chain Diligence Act.

If necessary (e.g., in the case of a supplier/service provider with increased risk), further relevant processes and measures will be initiated. Reported complaints and comments from third parties are taken into account in the risk management processes. These results are then used as a basis for creating and adapting preventive and remedial measures, such as internal regulations, work instructions, processes and training.

## PREVENTION MEASURES

In order to fulfil our responsibility to respect human and environmental rights, we rely on the interaction of various preventive measures in our own business processes as well as with direct suppliers.

We will regularly communicate this Declaration and its underlying human rights strategy internally (e.g., to Company employees) and externally (e.g., suppliers). The main elements of this Declaration are included in the Code of Ethics and the Vendor Code. The Company offers its employees extensive training and development opportunities.

We also provide training and development opportunities for our business partners to enable them to integrate human rights and environmental protection into their business activities.

We require our business partners to communicate our human rights and environmental expectations in the supply chain and to monitor compliance on an ongoing basis. To this end, our Vendor Code of Conduct is the basis for entering into a new business relationship.

DP World has a zero-tolerance policy towards non-compliance with internationally applicable social standards and internationally recognised human and environmental rights.

## GRIEVANCE MECHANISM

DP World is committed to conducting its business with the highest standards of honesty and integrity, and to facilitate the reporting of anything which may be contrary to that commitment.

DP World has established a global and group-wide grievance management system to enable employees, business partners and suppliers to report circumstances that indicate a violation of human and environmental rights along the value chain.

If any party subject to this Declaration discovers or suspects any human rights or environmental - related concerns or violations in any part of DP World's operations or global supply chain, the incident/situation shall be reported to the DP World Whistle Blower Hotline, in accordance with DP World's Group Whistleblowing Policy.

All concerns in relation to any human rights or environmental violations or incidents can be reported through the following channels:

Whistleblowing Hotline:

Online - external: <https://dpworld.ethicspoint.com>

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

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

## ACCESS TO REMEDY

DP World's primary objective is to take preventive measures to avoid human rights and environmental abuses. However, if human rights and environmental abuses have occurred despite preventive measures, affected parties can identify the violations and seek remedy. If a violation is identified after it has occurred, DP World's efforts are focused on minimising the impact and remediating the violation quickly.

In the event that DP World employees are involved in human rights or environmental violations, DP World will respond immediately to stop the business activities that are causing the violations and will take immediate action to ensure that these business activities are human rights and environmental compliant.

If DP World obtains clear knowledge of human rights or environmental violations in the supply and value chain, a corrective action plan to redress the violations or violations will be developed as quickly as possible in collaboration with our business partners.

## EFFECTIVENESS CONTROL

The effectiveness of all due diligence processes is reviewed at least annually and on an ad hoc basis to ensure that adverse human rights or environmental impacts can be identified, prevented, remedied or mitigated.

## MANDATORY ANNUAL REPORTING

In line with Section 10 of the German Supply Chain Due Diligence Act, the Company will report annually on the progress made in implementation and development on our website (<https://www.dpworld.com/en/eu-logistics>) and to the German Federal Office for Economic Affairs and Export Control (BAFA).

## FURTHER DEVELOPMENT OF THE DUE DILIGENCE PROCESSES

For DP World, respect for human rights and the implementation of human rights and environmental due diligence in all our operations is an essential contribution to improving the human rights and environmental situation along our global supply and value chains. The continuous development of our human rights and environmental due diligence processes is a high priority for DP World.

## CONTACT FOR QUESTIONS AND INFORMATION

For questions about this Declaration or other human rights or environmental law-related issues in Germany, please email the Human Rights Officer at [menschenrechtsbeauftragter@dpworld.com](mailto:menschenrechtsbeauftragter@dpworld.com). To report questionable conduct or a possible violation, you can also submit a report at any time through our whistleblowing online service at <https://dpworld.ethicspoint.com>.

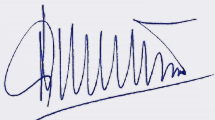
## FINAL PROVISIONS

The Declaration of Basic Principles for The Protection of Human Rights and the Environment comes into force from the date of its signature. It was adopted by the Management Board of the Company in December 2022.

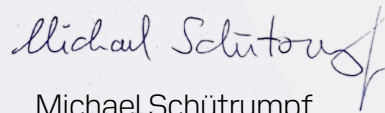


Rashid Abdulla  
CEO & Managing Director, DP World Europe

### Managing Directors of DP World Logistics Germany B.V. & Co.KG



Gerrit Bonnema



Michael Schüttrumpf



Jeroen van den Bleek



Patrick Vanlommel



Jan Wegmann

Approved by: CEO & MD of Europe  
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