

GLOBAL CODE OF ETHICS



DP WORLD

Table of Contents

WORD FROM THE CEO	4
1. INTRODUCTION.....	5
2. PURPOSE	5
3. SCOPE.....	5
4. POLICY	5
4.1. General Guidelines.....	5
4.2. Compliance obligations.....	6
4.3. Responsibilities of an employee.....	6
4.4. Breaches of the code	7
5. OUR PEOPLE	8
5.1. Human rights.....	8
5.2. Inclusion and Diversity.....	8
5.3. Workplace Health, Safety and Environment.....	8
5.4. Sustainability, Environment, and Climate protection.....	9
5.5. Standards of Service	9
5.6. Illegal Substance and Alcohol.....	9
5.7. Conduct outside of work	10
5.8. Dress and personal appearance	10
6. OUR BUSINESS.....	11
6.1. Anti-bribery	11
6.2. Gifts and entertainment.....	12
6.3. Anti-fraud.....	13
6.4. Conflicts of Interest	14
6.5. Anti-trust violations.....	17
6.6. DP World Securities Dealing	17
6.7. Trade Embargoes and Economic Sanctions	18
6.8. Operational Resilience.....	18

6.9.	Anti-Terrorism.....	19
7.	OUR INTEGRITY.....	20
7.1.	Financial and non-financial accounting and reporting.....	20
7.2.	Tax Integrity.....	20
7.3.	Intellectual Property.....	20
7.4.	Protection and proper use of DP World assets.....	20
7.5.	Information Management and Security.....	21
7.6.	Data Protection and Confidentiality.....	21
7.7.	Data Privacy and Personal Data Commitments.....	22
7.8.	DP World External Communications.....	22
7.9.	Political relationships.....	22
8.	DEFINITIONS AND TERMS.....	23

Word from the CEO

Dear colleagues,

As we work towards expanding our products and services to deliver end-to-end logistics solutions from factory floor to customer door, we take pride in every member of our team and recognise your role in driving the future of world trade. We work relentlessly to create the best environment for you to be at your best, and this has led us to update our Global Code of Ethics.

There are three important tenets – **Our People, Our Business, and Our Integrity**, which individually define various global policies that further culminate into our **Global Code of Ethics**. These foundational tenets not only define us and the way we conduct our business, but also is our differentiating factor.

We have earned an unopposed reputation in the market as an ethical and trustworthy partner of multiple businesses globally, and our revised Global Code of Ethics is designed to enable us to deliver unmatched value to our clients, stakeholders, colleagues as well as make a difference in the communities we operate in. They govern how each of us and the business we represent interact with various internal and external stakeholders. It also underscores **Our Principles** and shared commitment to change what's possible.

I encourage you to read and follow our updated Global Code of Ethics. Should you notice any misconduct, I encourage you to report it via our Whistleblowing Hotline.

I thank you for your commitment and dedication to maintaining a conducive work environment for everyone working with us.

Kind regards,

Sultan Ahmed Bin Sulayem
Group Chairman and CEO

1. Introduction

DP World's intention is to establish a culture of honesty and openness, and to encourage full disclosure of any potential unethical behaviour.

DP World employees, contractors, third party agents and representatives are expected to observe, respect, and abide by applicable local laws, rules, and regulations along with the Group's policies and the principles of this Code.

2. Purpose

The purpose of the Code of Ethics is to set common behavioural standards for all DP World employees, Contractors, third party agents, and representatives who must always:

- Act with integrity and in an ethical manner
- Work in a professional manner and encourage others to do so
- Conduct all activities with utmost care and professional judgement
- Adhere to the local laws and regulations and maintain high levels of professionalism in the country where they work.

3. Scope

All DP World employees, contractors, apprentices/interns, third party agents, and representatives working on behalf of DP World are expected to comply with these standards and to conduct themselves in a mature, professional, and responsible manner.

As it may not be viable to cover every potential circumstance, the following guidelines are intended as a general framework of ethical behaviour and should not be considered exhaustive.

4. Policy

4.1. General Guidelines

- 4.1.1. The Code of Ethics sets the standard of conduct expected of anyone working for, or on behalf of DP World. This Code demonstrates DP World's commitment to compliance and ethical behavior in all its business dealings.
- 4.1.2. The Code is developed in line with our important tenets – **Our People, Our Business, and Our Integrity** under which all our activities are conducted.
- 4.1.3. This Code is not a summary of all the laws, standards and policies that apply to DP World. It does not provide guidance for every situation an employee may encounter. It only provides broad guidelines on how employees, contractors, third party agents and representatives must conduct themselves when dealing with or employed at DP World.
- 4.1.4. In the event of facing a particular situation not covered in this Code, employees should immediately report such instance to their respective line managers and to the People department.

- 4.1.5. This Code of Ethics is not intended to supersede any legal or regulatory requirements which shall be applicable as per Local and Federal Laws in each country or region where DP World operates.

4.2. Compliance obligations

- 4.2.1. DP World strives to uphold its compliance obligations. The company does not compromise on unethical conduct, conflict of interest and compliance standards.
- 4.2.2. All employees are expected to adhere to local laws and regulations applicable in the country where their business unit is based and where they are conducting business. Questions and clarifications shall be directed to the line manager, or the qualified responsible personnel.
- 4.2.3. Employees are expected to report suspicions or legal violations in work-related matters. They shall directly report violations through DP World's Whistleblowing Hotline or other dedicated channels listed on the whistleblowing webpage dpworld.ethicspoint.com. The page includes country specific dedicated phone numbers and a web-based reporting application.
- 4.2.4. Matters of unethical business conduct shall be investigated thoroughly, fairly, and promptly. The individual who provides information shall not be subject to reprisal, including suspension or termination of employment; unless they have acted in bad faith, maliciously or unethically.
- 4.2.5. Any employee found to have engaged in intimidation against a co-worker because they have reported a wrongdoing shall be subject to disciplinary action as per DP World's Whistleblowing policy.
- 4.2.6. The Group Chairman and Chief Executive Officer is the sponsor of DP World's Global Code of Ethics. Geographical/Divisional heads are responsible for implementing, promoting, and monitoring this Code throughout their business areas, and shall annually report compliance through the annual policy compliance programme from Group Internal Audit. Group People shall ensure all employees acknowledge and provide sign-off to confirm their individual compliance against this Code.

4.3. Responsibilities of an employee

- 4.3.1. The Code provides guidelines on ethical standards expected from employees.
- 4.3.2. Employees should adhere to this code, along with other documents (policies, standard operating procedures (SOPs), bulletins, and manuals) provided by the company.
- 4.3.3. Employees must refrain from any on-duty conduct that could impair their job performance, cause damage to DP World and/or public property, jeopardise their safety or the safety of others, or negatively affect DP World's reputation or image.
- 4.3.4. Employees, even when off-duty, must conduct themselves in accordance with this Code. Including (but not limited to) while wearing company uniform, interacting with DP World stakeholders, or operating company vehicles/machinery.

4.3.5. Employees in a supervisory role are expected to:

- Raise awareness and educate their direct reports on this Code
- Ensure compliance with this Code and other relevant policies, standards, and procedures
- Report violations of this Code in accordance with company procedures.

4.4. Breaches of the code

4.4.1. Breach of this Code shall incur severe consequences ranging from a written warning letter up to termination of employment, depending on the severity of the breach.

5. OUR PEOPLE

5.1. Human rights

- 5.1.1. 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 a basic responsibility to adhere to human rights. They must act diligently to avoid infringing the rights of others and address any negative impact associated with their operations. In addition, businesses can go beyond their basic requirements and make voluntary and positive contributions to support human rights.
- 5.1.2. DP World promises to comply with human rights, work, and social standards. Child or forced labour shall not be tolerated at DP World or any of our subsidiaries or business partners. This Code also takes into account the ten principles of the **UN Global Compact**, **The Universal Declaration of Human Rights**, **the eight core work standards of the International Labour Organization (ILO)**, **Guiding Principles on Business and Human Rights**; the UN “**Protect, Respect and Remedy**” **Framework**, **IFC Performance Standards on Environment & Social Sustainability** and **The United Nations Sustainable Development Goals (SDGs)**.
- 5.1.3. DP World releases its Modern Slavery and Human Trafficking statement annually, outlining its commitment to ensure that slavery, servitude, forced labour and human trafficking are not tolerated in any of our operations and in those of our suppliers.

5.2. Inclusion and Diversity

- 5.2.1. DP World is on a mission to transcend boundaries and bridge the gap between all nations and cultures, not just in what we do but in how we behave. We are committed to fostering a culture where differences are accepted and celebrated, new perspectives are welcomed, and everyone feels that they belong.
- 5.2.2. DP World is a diverse company that conducts business in a number of regions and countries. The Inclusion and Diversity (I&D) policy outlines DP World’s commitment for a globally equitable and inclusive culture for all our employees, as well as our clients, suppliers, and broader stakeholders.

5.3. Workplace Health, Safety and Environment

- 5.3.1. The Group’s approach to Health, Safety and Environment is based on caring for our people, our environment, the communities in which we work and those of our stakeholder partners. At DP World, our goal is to make sure everyone gets home safe, and our environment is protected and enhanced wherever possible. This must be accomplished with a Zero Harm approach in our business.
- 5.3.2. DP World’s HSE (Health Safety & Environment) Policy is central to the Group HSE Management System and establishes a framework for the actions that we implement to protect our people and the environment.
- 5.3.3. DP World recognises the importance of programmes and initiatives to drive HSE performance in our businesses which include:

- Maintenance of comprehensive HSE Standards, guidelines, and targeted field-based risk assessment programmes
- Visible leadership and engagement through our accountability framework and dedicated training programmes
- Implementation of HSE programmes to support and influence our HSE culture and reduce risk.

5.4. Sustainability, Environment, and Climate protection

5.4.1. DP World is committed to being a good corporate citizen, operating in a sustainable and responsible manner that benefits its employees, the environment, customers, and local communities. This commitment is crucial for fostering a robust business. The aim of the Group Sustainability policy is to set out DP World's approach to Sustainability and its key priorities and focus areas. It also outlines ways in which employees can engage in sustainability initiatives and programmes to support DP World's commitment to being a responsible corporate citizen.

5.5. Standards of Service

5.5.1. Every DP World employee has the responsibility to ensure that there is no compromise in delivering the highest standards of services and products, and that every aspect of the operations which has an impact on quality, promotes and reflects these standards.

5.5.2. No employee shall take unfair advantage through manipulation, concealment, abuse of privileged information or misrepresentation of material facts.

5.5.3. DP World expects all employees to:

- Perform their role with care, diligence, professionalism, and integrity
- Strive for the highest ethical standards to deliver outstanding quality service
- Co-operate fully with colleagues to ensure that DP World's business is carried out efficiently and with courtesy
- Adopt a friendly, helpful, and professional attitude at all times
- Value resources and avoid waste
- Attend work and perform in accordance with their employment contract.

5.6. Illegal Substance and Alcohol

5.6.1. DP World is a drug-free and alcohol-free workplace. The company has zero-tolerance towards the use of drugs or alcohol. Employees and contractors are prohibited from using or being under the influence of, possession or distribution of alcohol, illegal drugs or illegal substances that impairs an employee's ability to carry out their job. DP World shall promptly notify the relevant authorities if any employee is found to be in breach of this Code.

Prescribed Medication

- 5.6.2. Employees consuming medicine should check with their doctor or pharmacist on whether any of the prescribed medicines could result in adverse side effects which may hinder their ability to properly carry out their role/job.
- 5.6.3. Employees are prohibited from using medication prescribed to another individual. They must not exceed the recommended dose of the prescribed medicine. Both instances shall be considered as misuse of medication and result in disciplinary action.

Alcohol, Drugs and Testing

- 5.6.4. Possession or consumption of alcohol, or any other illegal substances while at DP World premises or while carrying out their duty is prohibited. Attending work under the influence of alcohol or drugs is strictly prohibited and shall lead to disciplinary action.
- 5.6.5. For the safety of its employees, DP World reserves the right to test employees for illegal substance or alcohol at any time during working hours and without notice. These tests can be conducted randomly, or if the employee is believed to be under the influence of, or in possession of illegal substances, alcohol or involved in an accident or near-accident at work.
- 5.6.6. Positive results or a refusal to co-operate with testing shall lead to immediate relief of duty, disciplinary action, and notification to relevant authorities and third parties.

5.7. Conduct outside of work

- 5.7.1. Public confidence is very important for our business. Therefore, every employee must maintain high levels of professionalism even outside the workplace.
- 5.7.2. Disciplinary action shall be taken if an employee's actions outside of work makes them unsuitable for their role in any way or damages the company's reputation.
- 5.7.3. Employees must ensure that they properly observe, and comply with all local laws, rules, and regulations.
- 5.7.4. To ensure compliance with this Code, all employees are required to complete an annual undertaking/declaration.

5.8. Dress and personal appearance

- 5.8.1. All employees represent DP World when at work through their behaviour as well as their attire. They should always maintain personal hygiene and dress appropriately by wearing respectful clothing.
- 5.8.2. Employees should, under no circumstances, wear clothing or jewellery which may pose a health or safety risk.

6. OUR BUSINESS

6.1. Anti-bribery

6.1.1. Bribery is defined as the act of promising, offering, giving, receiving, requesting, approving, or soliciting something of value for the purpose of improperly influencing the action of an individual in the discharge of their duties, or to reward them for having broken a law or improperly performed a duty in the past. It does not matter if that bribe is given or received directly by a DP World employee or indirectly by a third party, which includes but is not limited to JV partners, agents, consultants, suppliers, contractors, or anyone else doing business on DP World's behalf. Whether that bribe is money, an object, a service, influence, or an intangible advantage or if the bribe is disguised, hidden, or given a special name is non-consequential.

6.1.2. DP World employees must observe and uphold the Group's zero tolerance stance on any form of bribery. Employees or third parties who suspect, know, or are concerned that bribery may be involved in relation to DP World's business must immediately raise their concerns through the whistleblowing hotline. They may use the following channels:

Whistleblowing Hotline:

Online – external: EthicsPoint - Dubai Ports World.

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.

6.1.3. To avoid bribery, employees should specifically look out for, and avoid:

- Gifts or corporate entertainment which could be considered lavish or excessive (in breach of the Gifts and Entertainment section of this policy)
- Transactions which lack business sense or economic substance
- Requests to prepare false or inaccurate documentation
- Using a supplier which gives generous gifts
- Accepting hospitality from a supplier in return of awarding them a supply deal
- Offering a large donation to a third party in return for favourable treatment
- Indications from DP World's third parties that they are engaging or intend to engage in any of the actions above.

6.1.4. To ensure that employees do not mistakenly offer bribes, DP World's Regional/Divisional Head of Compliance and/or Group Director of Compliance (or the relevant BU compliance lead) must approve any benefits of value which shall be given by employees to public officials.

6.1.5. Due to its global reach, DP World is subject to international laws such as the UK Bribery Act and the United States Foreign Corrupt Practices Act.

6.2. Gifts and entertainment

- 6.2.1. Giving or receiving gifts, entertainment and gratuities between DP World employees and suppliers or other outside business acquaintances represents a source of potential conflict of interest and can be viewed as bribery, depending on the value and circumstances. For example, no employee shall give to, or accept from any of the mentioned parties:
- Personal favours
 - Favours for friends or family
 - Discounts (Above the stated threshold value decided by the function)
 - Improper or lavish Gifts
 - Commissions
 - Other perks of value
 - Inappropriate entertainment
 - Cash or cash equivalents
 - Travel and travel-related expenses that are not directly tied to a specific and legitimate business purpose.
- 6.2.2. Any significant gift that might be perceived by an individual as potentially influencing decision-making is unacceptable, regardless of the value of the gift.
- 6.2.3. DP World employees must not accept gifts in the form of cash or non-cash (entertainment, trips, discounts, loans, commissions, or other favours) valued at more than USD (United States Dollar) 200 at any time from outside companies or individuals dealing with DP World. This is especially important if the outside company or individual concerned is soliciting business or information from DP World or was recently provided/awarded DP World business. Equally, before giving gifts or hospitality to any non-DP World employee, employees should research the gifts and hospitality rules of that person's organization or employer, in order to avoid the embarrassment of offering something that the person cannot accept.
- 6.2.4. If an employee is unable to decline a material gift or hospitality (greater than USD 200 in value) for valid business reasons, then they must, immediately upon acceptance:
- Record the gift or hospitality in the Gifts & Hospitality Register
 - Send an email to the Group Compliance department explaining the full circumstances of the gift or hospitality and why they thought they could not refuse the gift or hospitality
 - Report to the line manager, People Department and Regional Head of Compliance who shall determine the further course of action. They are then responsible for deciding what needs to be done with the gift.
 - The gift could be:
 - i. Retained by DP World to use in the course of its business.
 - ii. Donated to a charity of DP World's choice.

iii. Returned to the giver.

- 6.2.5. Small, genuine gifts such as flowers, chocolates, etc. which are not material (less than USD 200 in value), and which do not compromise DP World's relationship or business and are not intended to improperly induce an action or decision may be accepted.
- 6.2.6. If employees are offered hospitality which could be considered extravagant for valid business reasons, they should first seek approval from their Line Manager and the respective Regional Head of Compliance before accepting the offer.
- 6.2.7. When giving gifts or providing entertainment to others, it is important to consider their value from the perspective of both the giver and the recipient, as the recipient might assign a different significance to them than what was originally intended.
- 6.2.8. DP World employees can seek advice related to Gifts and Hospitality from their line manager or by contacting the Group Compliance Department.

6.3. Anti-fraud

- 6.3.1. DP World is committed to prevent, detect, and respond to fraudulent activities and maintains a zero-tolerance approach towards any fraudulent or corrupt business practice.
- 6.3.2. DP World employees must always act ethically and with integrity when conducting business for the Group.
- 6.3.3. Employees must:
- Comply with all policies with respect to fraud and should not provide false information or present documents and information in a way which could be considered misleading
 - Safeguard DP World's resources for which they are responsible
 - Report known or suspected fraud.
- 6.3.4. Responsibility for containing the risks of fraud rests with all employees of the Group. DP World employees are expected to promptly report all known or suspected instances of fraud.
- 6.3.5. All Business units are required to provide letters of representation to the Group for the purpose of its annual and interim financial statements stating that they are aware of the requirements set by this policy and that necessary controls have been implemented and are being monitored in their respective BUs (Business Units).
- 6.3.6. The Group shall, where necessary, pursue appropriate legal remedies against employees or outside parties involved in fraudulent or corrupt business practices.
- 6.3.7. To report unethical behavior confidentially, DP World employees and stakeholders are encouraged to contact the DP World's whistleblowing hotline, through the following channels:

Whistleblowing Hotline:

Online – external: EthicsPoint - Dubai Ports World.

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.

6.4. Conflicts of Interest

- 6.4.1. All DP World employees must avoid situations where personal interests could conflict, or appear to conflict, with the interests of DP World. Our reputation depends not only on our service but also on the manner in which DP World conducts its relationship with suppliers, government officials, organizations, and others outside DP World. Each DP World employee must ensure that their conduct does not provide or give the appearance of providing them with personal gain at the expense of DP World or an external business contact.
- 6.4.2. Conflict of interest arises when personal interests, contacts or outside activities impair the employee's ability to impartially perform work or make objective decisions on behalf of DP World. This includes any activity that competes with the Group. Employees must carefully ensure that their personal interests do not conflict with DP World responsibilities. Advice should be sought from the line manager and/or the relevant local People department if there is uncertainty about a real or possible conflict of interest.
- 6.4.3. Employees and directors are to put DP World's interests ahead of their own personal interests in executing the Group's business. All business conducted on behalf of DP World must be performed in a diligent and loyal manner and in line with the global and local policies.
- 6.4.4. Making or receiving illegal payments or inducements, such as bribes, are contrary to the policy of DP World, and the funds and resources of the Group shall not be used directly or indirectly for any such purpose. DP World's policy prevents making donations to political parties.
- 6.4.5. Conflicts can be caused by relationships with associated persons or institutions:
- **Associated Person:** Family relations included but not limited to spouses, domestic partners, parents, children, siblings, grandparents, or any others such as friends, business partners or individuals sharing an affiliation to any organization (e.g., political party, association, community, clan, tribe, etc.).
 - **Associated Institution:** Associated Institutions are any organizations, corporations, associations, or governments in which the person (or their associated persons) has served during the last 2 years or is currently serving as an agent, officer, director, trustee, partner, advisor, or employee.

Board Service or Other Civic Activities

- 6.4.6. Employees serving on boards or other governing bodies of for-profit or non-profit organizations may, in some cases, create a conflict.
- 6.4.7. Any board service that could take away time from their job at DP World must be approved by their line manager and People department.
- 6.4.8. The following activities must be approved by the Director - Group Compliance:
- Service on boards of any entity with which DP World conducts business, including as a recipient or provider of funds

- Service on a governmental regulatory board or quasi-judicial or quasi-legislative commission that may take actions that could affect DP World
- Employees running for or holding public office shall report the activity to the Compliance Officer prior to proceeding.

Family and Friends

- 6.4.9. Employees should not directly or indirectly supervise or use influence to favor anyone with whom they have a family or close personal relationship.
- 6.4.10. In certain circumstances, and at DP World's discretion, it shall be necessary to reassign someone to avoid a conflict of interest, or to take steps to maintain a harmonious and productive work environment.
- 6.4.11. Interviewing, hiring, or engaging a family member or close personal friend as an employee, consultant or business partner creates a conflict of interest. Employees must disclose any such relationship and abstain from participating in any decision-making processes related to them. Business transactions with associated persons or institutions through their financial nature create conflicts. Examples include hiring a company that is owned by a relative; entering into a partnership with a company that they or any relative own or control directly or indirectly; or giving business to a close personal friend.

Procurement Decisions / Sub-award Decisions

- 6.4.12. A common transactional conflict arises during a procurement or sub-award process, for example, when a DP World employee's procurement decisions are influenced by personal interests. This includes:
- Familial or close personal relationships between procurement employees and subcontractors
 - Procurement employees having a direct financial interest in a bidder or subcontractor
 - Procurements made where employees have an employment link to the subcontractor.

Disclosure and Management of a conflict of interest

Employees

- 6.4.13. All employees shall identify conflicts of interest before taking any action and address the conflict as mentioned above through obtaining approval from the Regional Head of Compliance before proceeding with any such activity or decision.

Management & Supervisory Employees

- 6.4.14. Employees in management & supervisory roles have an enhanced obligation to report and address conflicts due to their position at DP World.
- 6.4.15. The Regional People function shall annually circulate a Declaration of Interests Form for every employee to formally acknowledge that they understand and adhere to DP World's Global Code of Ethics and declare any conflict of interest.

Executive Team and Board of Directors

- 6.4.16. The Group Head of Compliance shall annually circulate an Acknowledgment and Affiliation Disclosure Form for the Executive team and Board of Directors to acknowledge understanding of and adherence to DP World's Conflict of Interest Policy. They are to list entities in which they, or a member of their families, have a material interest, or occupy a position that might create a conflict under this policy.
- 6.4.17. DP World's Executive Team and members of the DP World Board of Directors play a crucial role in the mitigation of conflicts of interest through enhanced reporting obligations. Acknowledgment and affiliation must be disclosed and conflicts relating to this Group should be addressed as and when they may arise as per this policy, and should be reported to the regulators.

Internal Directorships

- 6.4.18. Employees of DP World and its Group entities ("Group") shall, from time to time, be appointed as directors in Group entities, including wholly owned subsidiaries and joint venture companies in which DP World has an interest. Such appointments are subject to internal approval pursuant to DP World's Governance processes, and the applicable laws and regulations.
- 6.4.19. A DP World employee appointed as a director on the board of a wholly owned Group subsidiary or joint venture entity ("Company"), must:
- Fulfil the directorship role and responsibilities as part of their existing duties under the terms of their employment contract with the Group. In order to avoid suspicion, such appointment shall not attract any additional remuneration or other benefits
 - Act with integrity, good faith and lawfully, in what they consider to be the best interests of DP World
 - Not use their powers to benefit themselves or third parties
 - Exercise their duty of care, diligence, and skill that a reasonably prudent person would demonstrate in comparable circumstances
 - Avoid or immediately disclose actual, potential, or perceived conflicts of interest whether personal or professional
 - Utilize their authority for legitimate purposes and maintain appropriate confidentiality
 - Act in accordance with the Company's Articles of Association and the applicable laws and regulations of their respective country/region
 - Not use their position/influence to gain individual profit.
- 6.4.20. If the local laws and regulations applicable to a Company require a directorship fee to be paid to a Group employee appointed as a director of such Company (by virtue of such appointment), the relevant Company must directly transfer such directorship fees to DP World's global Corporate Social Responsibility account, pursuant to the Global Accounting policy.
- 6.4.21. Furthermore, if the applicable local laws and regulations require the directorship fee to be paid directly to an employee appointed as a director of such Company (by virtue of such appointment), the employee must inform the Group Company Secretary and local company's Finance team of any such amount received. Company's finance team must ensure that such directorship fee is

reimbursed to DP World's global Corporate Social Responsibility account, pursuant to the Global Accounting policy.

Secondary employment / outside activities / outside directorships

- 6.4.22. DP World encourages and supports participation in public duties, but it is for the individual to ensure that participation in such activities does not create a real or perceived conflict of interest. When in doubt, the employee must discuss the matter with their line manager and indicate likely commitments.
- 6.4.23. For paid secondary employment or outside directorship, employees must obtain permission from their Line Manager and local HRBP prior to undertaking any such commitments.
- 6.4.24. Approval shall only be given if:
- It is ascertained that the secondary employment/ outside directorship does not result in any conflict of interest
 - It does not interfere with the employee's ability to do their job, responsibilities, or compromises their ability to make decisions for DP World
 - It does not infringe on DP World's obligations under any applicable laws.

6.5. Anti-trust violations

- 6.5.1. DP World supports free, fair, and independent competition and deals with all parties independently and impartially. The laws pertaining to competitive practices prohibit anti-competitive behaviour and/or behaviour that gives an unfair advantage to the Group (also known as anti-trust violations). Such prohibited behaviour includes (among others) price fixing, market sharing (i.e., dividing markets), sharing of commercially sensitive information with competitors, inappropriate conduct in any markets where DP World may have a strong market position, if this would exclude competitors or exploit customers, and participating in events such as meetings, conferences, forums, and committees which may have an anti-competitive effect. These laws shall also require DP World to seek approval for commercial agreements that might affect competition, and for certain mergers and acquisitions.
- 6.5.2. DP World employees must comply with antitrust and other laws regulating competition. DP World employees are expected to be familiar and comply with the Group's antitrust policies and guidance.

6.6. DP World Securities Dealing

- 6.6.1. DP World employees must not disclose unpublished price sensitive information to any person, irrespective of whether the individual is an employee.
- 6.6.2. All non-public information must be considered 'inside information' and must never be used for personal gain. Such actions are considered unlawful and are criminal offences, which may result in a jail sentence.
- 6.6.3. DP World's Securities Dealing Code details when Restricted Persons may deal in the Securities of the Company and must be observed at all times. Most notably, a Restricted person must always obtain prior consent from the Company Secretary before dealing in the Company's securities.

- 6.6.4. Employees and associated individuals must always obtain prior consent by completing and submitting the request for clearance form to deal in securities, to Group Corporate Secretary before the purchase or sale of any DP World Limited Securities.

6.7. Trade Embargoes and Economic Sanctions

- 6.7.1. DP World operates in a complex global environment in which international organizations, such as the United Nations, and governments, such as the United Arab Emirates, United States, United Kingdom, Canada, Australia, Japan, and European Countries maintain trade embargoes and economic sanctions targeted towards specific entities, individuals, activities, products and/or countries. In some cases, these trade embargoes and economic sanctions impact not only business activity within a specific country, but also actions taken by citizens of that country, regardless of where they are located.
- 6.7.2. Further, investors, partners, clients, and financial institutions shall impose restrictions on DP World that are more stringent than what the applicable trade embargoes and economic sanctions allow. In such cases, DP World's activities shall fully comply with the legal requirements of applicable trade embargoes and economic sanctions even if it may violate the contractual commitments that DP World has made to an investor, partner, client, or financial institution.
- 6.7.3. Employees must carefully evaluate potential business opportunities and current activities to ensure the company operates within the requirements of applicable trade embargoes and economic sanctions.

6.8. Operational Resilience

- 6.8.1. DP World has adopted a common Operational Resilience approach to enable global trade, maintain customer experience, and safeguard DP World's people, business, and reputation.
- 6.8.2. DP World is committed to maintaining high levels of resilience through the delivery of an Enterprise-wide operational resilience model, including business continuity management.
- 6.8.3. The following objectives have been established for the implementation and maintenance of a robust business continuity capability at DP World:
- Business continuity should primarily be focused on maintaining delivery of Products and Services within pre-defined acceptable thresholds
 - The business continuity program should continuously seek to mitigate the risk of disruption to Product and Service delivery
 - Business continuity capability (teams, plans and processes) should be regularly tested and exercised to ensure that they are robust, effective, and fit the purpose.
- 6.8.4. Business continuity provisions provide for timely availability of all resources necessary to operate critical business processes to pre-defined minimum acceptable levels of operation.
- 6.8.5. The Enterprise Risk and Resilience team (ERR) supports Business Units with developing and implementing best practice Business Continuity Plan. They also collaborate with Business Units to test these plans to ensure they are strong and reliable.

6.8.6. Employees have a role to play in ensuring that our business, and the DP World Group as a whole, continues to remain resilient.

6.9. Anti-Terrorism

6.9.1. DP World strictly prohibits any direct or indirect support for terrorist organizations and does not allow any business contacts with criminal organizations. Internal measures are in place to prevent the establishment or maintenance of any direct or indirect business contacts with terrorist organizations or institutions and individuals associated with them.

7. OUR INTEGRITY

7.1. Financial and non-financial accounting and reporting

- 7.1.1. Employees have an obligation to report our business performance accurately, transparently and in a timely manner, to our investors, and clients. Accurate record-keeping protects our reputation.
- 7.1.2. At all times, DP World shall maintain financial records that are accurate and give a fair understanding of the DP World's activities.
- 7.1.3. Employees must always:
- Accurately and fairly report all business transactions
 - Complete all expense claims accurately and in line with the employee-related business expense procedure
 - Maintain records in accordance with the legal requirements.

7.2. Tax Integrity

- 7.2.1. DP World prohibits Tax Evasion and facilitation of Tax Evasion. This includes being involved in, proposing, requesting, arranging, allowing Tax Evasion.
- 7.2.2. Employees must comply with all tax laws and regulations pertaining to each jurisdiction where DP World has business interests.

7.3. Intellectual Property

- 7.3.1. DP World has created a framework within which our businesses can innovate and cultivate a culture of innovation across the organization. This focus on innovation has led to an increase in DP World's intangible assets. The Intellectual Property policy provides the necessary guidance to protect the outcome of innovative work.
- 7.3.2. Intellectual Property includes trademarks, copyright, domain names, patents (inventions), designs, trade secrets and confidential information. The framework protects everything including DP World's brand, blueprints for infrastructure and the technology used to deliver DP World's services.

7.4. Protection and proper use of DP World assets

- 7.4.1. All employees have the responsibility to protect and preserve the DP World's assets. This includes responsibility for adherence to procedures that ensure assets are not misused, compromised, or wasted. Every employee must seek to use all our resources with efficiency, honesty, and care.
- 7.4.2. Employees are prohibited from taking business opportunities that arise through corporate property, information, or position. This includes obtaining personal gain or competing with the Group.

Acceptable Usage of Technology:

- 7.4.3. Employees must only use approved end-user devices, applications, and other technology assets for official work and business transactions. IT assets must be used responsibly and for business purposes only.
- 7.4.4. Employees having access to DP World IT assets must ensure that their use is consistent with DP World Group Technology policies. Employees must not use IT assets for illegal and prohibited purposes.
- 7.4.5. Employees should only use software approved by DP World Technology. It is prohibited to download and install freeware, spyware, and pirated software on DP World assets.

7.5. Information Management and Security

- 7.5.1. DP World recognises the need for information security and uninterrupted performance for the benefit of all its stakeholders – employees, customers, and partners.
- 7.5.2. Employees, vendors, contractors, consultants, and temporary employees having access to DP World’s information assets, services, and IT facilities have access to valuable resources and sensitive data. It is everyone’s responsibility to ensure and protect the Confidentiality, Integrity & Availability (CIA) of DP World’s information assets.
- 7.5.3. A comprehensive Information Security Governance Master Policy is accessible and shared with all relevant stakeholders and third parties. The policy guides employees and third-party personnel on the intent of DP World to establish an Information Security Management System (ISMS) to protect confidentiality, integrity, availability, privacy, and security throughout the operations and delivery.

7.6. Data Protection and Confidentiality

- 7.6.1. Employees are responsible for safeguarding and handling business data in a secure and responsible manner, ensuring it is used solely for the intended purposes. Employees with access to sensitive or confidential information must be aware of how and when this information can be shared with others—if at all. When in doubt about whether the information at hand is considered Inside Information, Group employees must contact Investor Relations.
- 7.6.2. DP World employees involved in the preparation of information included in any public communication to shareholders or investors or in any document or report that shall be filed with the stock exchange must ensure that such information is full, fair, timely and understandable.
- 7.6.3. All such public communications must only be made through the Group Company Secretariat/ Investor Relations.
- 7.6.4. No DP World employee shall without proper authority access, modify, disclose, or make use of any trade secrets, confidential commercial or personal information for any purpose other than the legitimate execution of their duties.
- 7.6.5. The confidentiality obligation extends after employees cease working for the Group and covers disclosure to others.

7.6.6. A 'disclosure test' must be conducted when evaluating all DP World related business transactions and practices, i.e. neither DP World's integrity nor its local reputation should be damaged if full details of the transaction were to become public knowledge, nor should it result in a breach of any of DP World's relevant policies.

7.7. Data Privacy and Personal Data Commitments

7.7.1. DP World takes all data protection and privacy laws across the world very seriously.

7.7.2. Therefore, employees must always:

- Understand that personal data is defined very broadly and includes any information related to an individual that can be used to identify the person directly or indirectly. This includes personal data such as name, address, e-mail address, phone number, identification numbers, or computer IP address, gender, position, title, etc.
- Use personal data for specific and legitimate business purposes only, in compliance with applicable data privacy laws and regulations
- Ensure personal data is secure at all times and is relevant, accurate and up to date
- Ensure that arrangements are in place to comply with data privacy and data transfer laws and regulations

7.8. DP World External Communications

7.8.1. Any communication with external stakeholders, such as clients, shareholders, charity foundations or any media, must be clear and truthful. We urge employees to exercise caution when using social media and email.

7.8.2. All external communication must be approved by our Group Communications team in DP World or within the relevant Business Unit. Employees must comply with DP World Global Social Media policy while interacting on any online social platform.

7.9. Political relationships

7.9.1. DP World does not engage in political activities. Therefore, employees are expected to keep any political affiliation outside the workplace. Political neutrality is essential to our organization.

7.9.2. DP World understands that employees may have personal political involvements of their own. The company respects their right to do so. If engaging in any personal political activity, employees must ensure to clarify that the views expressed are their own.

8. Definitions and Terms

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

Term	Definition
DP World	DP World Limited and its subsidiaries.
Group	DP World Limited and its subsidiaries.
Business Unit	A unit of DP World that operates independently and is responsible for their own Profit & Loss. It has its own goals, objectives, and strategies.
Connexions	DP World corporate intranet for internal information sharing with all DP World employees.
Contractors	Individuals not employed by DP World but working full-time or part-time for DP World under the contract of a third-party company.
Declaration of Interests Form	Form to be filled in and signed by DP World employees to disclose any potential bias or conflict that could compromise their impartiality or objectivity in a position of authority they may hold or in any decision-making process they may be involved in.
Disclosure test	A standard or method used to determine whether certain information or evidence is relevant, admissible, or protected by any privileges or confidentiality rules, to be disclosed during legal proceedings.
Employees	DP World permanent employees employed by DP World.
HRBP	HR Business Partner or People Department representative
Illegal drugs / Illegal substances	Drugs or substances which production, distribution or use is restricted or forbidden by applicable laws.
Inside Information	<p>Information which:</p> <ul style="list-style-type: none"> ▪ is of a precise nature; ▪ is not generally available; ▪ relates directly or indirectly to DP World Limited or its securities; and ▪ if made generally available, would be likely to have a significant effect on the price of DP World Limited securities or on the price of related Financial Instruments or investments. <p>For the purposes of this definition, information is “precise” if it:</p> <ul style="list-style-type: none"> ▪ indicates circumstances that exist or may reasonably be expected to come into existence or an event that has occurred or may reasonably be expected to occur; and ▪ is specific enough to enable a conclusion to be drawn as to the possible effect of those circumstances or that event on the price of DP World Limited securities or on the price of related Investments. <p>For the purposes of this definition, information would be likely to have “a significant effect on price” if it is information of a kind which a reasonable investor would be likely to use as part of the basis of his investment decisions. In determining whether information would be likely to have a</p>

	significant effect on the price of DP World Limited securities or on the price of related Investments, DP World employees should be mindful that there is no figure (percentage change or otherwise) that can be set when determining what constitutes a significant effect on the price of its securities or on the price of related Financial Instrument or investment.
Prescribed Medication	A pharmaceutical drug regulated by government authorities that can only be obtained with a valid prescription from an authorized healthcare professional.
Price Fixing	A written, verbal, or inferred agreement among competitors that sets or influences prices or competitive terms.
Securities Dealing	includes <ul style="list-style-type: none"> ▪ Any acquisition or disposal of, or agreement to acquire or dispose of any of the Securities of DP World Limited; ▪ Entering into a contract (including a contract for difference) the purpose of which is to secure a profit or avoid a loss by reference to fluctuations in the price of any of the Securities of DP World Limited; ▪ The grant, acceptance, acquisition, disposal, exercise, or discharge of any option (whether for the call, or put or both) to acquire or dispose of any of the Securities of DP World Limited; ▪ Entering into, or terminating, assigning, or novating any stock lending agreement in respect of the Securities of DP World Limited; ▪ Using as security, or otherwise granting a charge, lien, or other encumbrance over the Securities of DP World Limited; or ▪ Any other transaction, including a transfer for nil consideration, or the exercise of any power or discretion effecting a change of ownership of a beneficial interest in the Securities of DP World Limited.
Tax Evasion	Refers to dishonestly breaching a legal duty or obligation in relation to Tax, and/or entering into Tax arrangements without a good faith belief that they are legal.
Third party agents	Third party agents are individuals, organizations, or entities that are not directly involved in a particular transaction or relationship between two primary parties. They act as intermediaries or representatives who facilitate interactions, negotiations, or transactions on behalf of one or more parties. These agents typically operate independently and may have their own interests or objectives in the process.