

# Modern Slavery and Human Trafficking Statement

#### 1. Introduction

DP World strongly believes that the significant role we play in the communities in which we operate helps form a secure and resilient society. Through adopting data-driven logistics in pursuit of sustainable solutions that transform our business and help us lead the future of global trade, we aim to create the most productive, efficient and safe trade solutions globally. Doing so is as important to us commercially as it is to the societies in which we operate. As a major global employer, we know we can play a significant role in improving people's lives, strengthening the communities and protecting the environment. This means ensuring that slavery, servitude, forced labour and human trafficking is not tolerated in our operations or those of our suppliers globally, which is a responsibility we take very seriously.

Sultan Ahmed Bin Sulayem, Group Chairman and CEO

## 2. Our organisation

DP World is a global trade enabler comprising of ports and terminals, parks, logistics and economic zones along with maritime services. Our dedicated team of over 56,000 employees from 134 countries cultivates long-standing relationships with governments, shipping lines, importers and exporters, communities, and many other important constituents of the global supply chain, to add value and provide quality services today and tomorrow.

In 2019, DP World handled 71.2 million TEU (twenty-foot equivalent units) across our portfolio. With its committed pipeline of developments and expansions, the current gross capacity of 91 million TEU is expected to rise depending on market demand.

### 3. Our policies and procedures on modern slavery and human trafficking

Our commitment to ensuring that there is no modern slavery or human trafficking in any part of our business and to seeking to ensure our supply chains globally are also free of these issues is covered in a range of policies which apply across the group. Our annually revised modern slavery and human trafficking policy sets out our approach to modern slavery and human trafficking both in our organisation and in relation to our suppliers. The policy also clarifies the steps that our employees can take if they have concerns about the existence of any such incidents.

Other key policies include provisions with respect to modern slavery and human trafficking which are:

- Procurement Policies and Procedures, which sets out minimum criteria to be placed on DP World's approved vendor list including provisions with respect to modern slavery, human trafficking and child/ forced labour;
- Company Standards and Conduct Policy and Procedure, which sets out employees' obligation to report suspected and known incidents of modern slavery and human trafficking, how to do so and the consequences for failing to do so; and
- Recruitment and Selection Policy, which includes a prohibition on use of child labour and withholding workers' original government-issued identification and travel documents, unless required by law.



We have established a supplier self-assessment on modern slavery and human trafficking as part of our vendor screening process; a vendor code of conduct; and prospective vendors' modern slavery or human trafficking risk is factored into our procurement decisions.

In 2019, DP World became signatory to the United Nations Global Compact (UNGC) and its 10 principles, which encompass human rights, labour, the environment and anti-corruption. By signing the UN Global Compact, DP World committed to align its strategies and operations with these principles. An internal Human Rights Working Group was established at DP World in 2019, to develop a Human Rights framework and associated policies and procedures for implementation. Modern slavery is a key component of our human rights approach and we will look to further integrate our approach on these areas and develop a broader range of procedures and programmes in the group.

All policies' compliance is monitored internally by management, and independently assessed by Internal Audit during planned business audits.

# 4. Our Supply Chain:

We seek to partner with suppliers whose ethical principles align with our own, and we expect them to operate fair and ethical workplaces. Our supply chain is managed by our Group Procurement department, which operates as a single global function structured across all business lines and jurisdictions.

Our suppliers will be asked to complete a supplier modern slavery and human trafficking self-assessment. This includes analysing the risk of modern slavery and human trafficking in the jurisdictions where they operate and setting out the policies and procedures they have in place to mitigate such risk.

We have conducted modern slavery desktop audits and knowledge sharing sessions with 7 major contractors and consultants that have been frequently invited to tenders or have been awarded projects in 2019. Furthermore, follow-up emails were sent to all 7 major contractors and consultants with guidelines and sample documents on how to improve and increase modern slavery awareness and compliance within their organisations.

Furthermore, we will seek to introduce additional controls, by including language with respect to compliance with anti-slavery and human trafficking laws and policies in new supplier contracts. We also audit (on a sampling, risk-based basis) certain suppliers and operations for modern slavery and human trafficking and other risks.

We have a confidential, externally administered, whistleblowing hotline available to all DP World workers and third parties which can be used to report suspected violations of human rights. All reporters are protected from retaliation in any form.

#### 5. Areas of risk in our business and supply chains

The risk of modern slavery and human trafficking varies by jurisdiction and sector. Hence, we created a working group to address any immerging issues. This working group identified procurement, third party contractors and the use of our ports by others for human trafficking purposes as the highest risk areas for DP World.

To mitigate these risks, we have increased our oversight of, and requirements for, vendors and third-party contractors with respect to modern slavery and human trafficking. Our Global Security team works closely and supports global law enforcement agencies to improve supply chain security and prevent human traffickers from using DP World's terminals and facilities. This includes enhancing our security management system processes, deploying advanced security technologies, using internal and external



audits, providing awareness training on how to identify indicators of modern slavery and human trafficking, particularly in combination with criminal activities. In addition, as well as implementing and acquiring the mandatory security regulatory accreditations like ISPS Code, DP World has raised its security benchmark by adopting and implementing ISO 28000 and other Global Security Initiatives across its global portfolio, such as the Custom-Trade Partnership Against Terrorism (CTPAT), Authorized Economic Operator (AEO) and Container Security Initiatives (CSI) which further improves the mitigation of human trafficking threats in our terminals and facilities.

### 6. Effectiveness of efforts

We are currently focusing on raising awareness amongst our employees, workers and contractors to understand the requirements of the UK Modern Slavery Act 2015 and other modern slavery regulations from around the world, and on giving them the tools to flag potential issues. In 2019, to further this, we held a knowledge sharing session with one of our major contractors on this topic. Over time, we will develop key performance indicators across our various business units to ensure that our modern slavery and human trafficking policies and procedures are implemented to maximum effect.

## 7. Training

We completed the online training module, which has been translated into 10 languages, and this module starts with an overview of the policy. We have developed an online training module titled "Modern Slavery Awareness", which has been translated into 10 languages, on the indicators of modern slavery and human trafficking which all DP World email network users are required to complete.

Information on modern slavery and human trafficking is also being provided to port workers at operational briefings, where appropriate. Such a training is mandatory and forms one of the six on-line courses which are part of a new employee's induction.

Posters are provided in a variety of languages to each business unit to raise awareness, and act as a reminder, of the signs of modern slavery and how to report any suspicions.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes DP World's modern slavery and human trafficking statement for the financial year ending 31 December 2019. It has been approved by DP World's board of directors.

Sultan Ahmed Bin Sulayem

Group Chairman and CEO

10 March 2020