

Whistleblowing Policy



DP WORLD

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Introduction

- 1.1 Any modern and diverse organisation faces many risks, including the occurrence of incidents that can harm the company's reputation, assets and the welfare of its employees. It could be criminal activity, fraud (i.e. intending to obtain benefits through dishonesty or deception such as bribery, conflict of interest, etc.), trafficking, damage to property, ongoing breaches of human rights laws or specific individual violations (including discrimination or harassment). These incidents can arise out of improper behaviour or a deliberate violation of policies and need to be managed effectively to limit the impact to businesses and employees.
- 1.2 DP World Group (the Group) is committed to conducting its business with the highest standards of honesty and integrity. To facilitate the reporting of anything which may be contrary to that commitment, DP World has a globally accessible whistleblowing hotline to provide all stakeholders (as defined in Section 5 herein) with a free and confidential reporting mechanism.

Purpose

- 2.1 This policy aims to provide the means and appropriate communications, and to encourage and provide stakeholders the confidence and guidance to report all genuine suspected wrongdoing, dishonesty and fraudulent matters, in a timely manner. In accordance with the policy procedures, DP World will investigate these concerns in an effective and confidential manner, giving appropriate protection to the identity of the informant as required.
- 2.2 This policy presumes that such reports of wrongdoing will be made in good faith and not maliciously, recklessly or for personal gain. Any such reports that are not made in good faith, may be subject to action under DP World disciplinary procedures or applicable laws.
- 2.3 Where a concern involves or relates to a personal Human Resources issue or grievance, the local DP World Employee Handbooks provides procedures and details for the appropriate steps for employees to follow.
- 2.4 For the purposes of this policy, the definitions of 'whistleblowing and 'whistleblower', as well as other relevant terms, are set out under Section 'Definitions and Terms'.

Scope

- 3.1 This policy is applicable to all stakeholders. It is publicly available on the internet.
- 3.2 We encourage the application of this policy amongst all business partners and joint ventures where DP World is a minority shareholder.

Policy

Reporting Information:

- 4.1 All stakeholders are expected to act honestly and always with the highest levels of integrity and ethics when conducting business. They also have the responsibility to report any policy breach, any suspected fraud or any other wrongdoing through any of the below detailed reporting mechanisms.

4.2 All persons are strongly encouraged to report any concerns as directed, in as much detail as possible, in line with this policy. Since it is likely the concerns relate to the conduct of DP World staff, and therefore might present a difficult and personal conflict for the informant, there are multiple methods of reporting available.

Reporting Mechanisms:

4.3 The following methods are available:

Whistleblowing Hotline - DP World Websites (Internet)

If you have witnessed any corruption or wrongdoing that affects DP World business, or may violate laws, particularly including with respect to Human Rights violations, Human Trafficking, drugs, contraband, Illegal Wildlife Trafficking (IWT) or any other form of trafficking, you can contact, 24/7, the secure Whistleblowing hotline in complete confidence via the links found in company websites. These links give you the option of choosing the preferred language for your report. All reported information is treated in the strictest confidence and will be investigated by the appropriate team. Informants can remain anonymous, and the external service provider will not identify them to DP World, if requested.

Letter

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

DP World
Attention: Head of Fraud Risk Services
4th Floor, Building 17, Jebel Ali Freezone
PO Box 17000
Dubai, UAE

Direct Reporting

Please approach Fraud Risk Services, at:

Attention: Head of Fraud Risk Services
4th Floor, Building 17
DP World
Jebel Ali Free Zone
Dubai, UAE

Protection/Confidentiality:

4.4 This policy is written with all the provisions for confidential and anonymous reporting, as it is important for staff to feel secure in this reporting environment. Subject to country laws, whistleblowers have the option to remain anonymous or to identify themselves.

4.5 Any report or information received through the above mechanisms will be kept confidential, and any details pertaining to any possible matter of fraud or other wrongdoing, will only be conveyed to those people who require the knowledge in the proper performance of their office or function.

4.6 It is globally understood that a 'whistleblower' can be negatively portrayed as someone who is 'informing on their own', is a 'spy', or that they might be revealing information that has significant and serious repercussions for the accused. As such, they might be fearful for reporting information in the worry of being subject to retaliation.

DP World acknowledges this concern and will not tolerate retaliation of any kind relating to informing parties. They will also support anyone who raises genuine concerns in good faith under this policy, even if the information is not established as a fraud or other wrongdoing. Stakeholders must be assured that they

will not be victimised or disadvantaged in reporting a breach and any person who considers they are being victimised or disadvantaged because of such reporting should use the hotline to report this also.

- 4.7 Where evidence is found to suggest that efforts had been undertaken by any Group employee to identify the reporting party of 'whistleblowing' information, that person will be subject to appropriate disciplinary action.
- 4.8 If any reporting party believes they have become the subject of any retaliation, they are entitled to submit a formal retaliation complaint. This should be made within 6 months of the initial retaliation, or if multiple occasions, within 6 months of the last incident. Complaints can be made through any of the routes outlined in section 4.3 herein.

Investigation:

- 4.9 Strict confidentiality and objectivity concerning the reporting party and the information will be maintained at all stages of the investigation by all persons involved, including investigators, witnesses and other persons interviewed or corresponded with in the course of investigation. This requirement will be formally placed on all involved persons by the investigating officers.
- 4.10 Feedback on the investigation outcome may be given to the reporting party, but only if contact details are provided to Fraud Risk Services. However, DP World cannot guarantee the outcome of the investigation is the result the whistleblower might be seeking, nor does it undertake to provide a report to the whistleblower beyond confirmation that a conclusion was reached.

Records and Monitoring:

- 4.11 DP World Fraud Risk Services shall retain all records relating to the reports for a period in accordance with company document retention policies and/or country laws as applicable. Access to these records is strictly restricted to authorised management and staff under the guidance of the Head of Fraud Risk Services and relevant authorities.
- 4.12 The performance of the whistleblowing hotline is overseen by the DP World Audit and Risk Committee through regular reporting.

Related Standards, Policies and Processes

This policy should be read in conjunction with:

- DP World Global Fraud Policy
- DP World Anti-Bribery Policy
- DP World Code of Ethics
- Human Rights Policy
- Human Rights Statement
- Modern Slavery & Human Trafficking Policy

Definitions and Terms

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

Audit and Risk Committee	a committee comprising non-executive Directors that ensures the integrity of the financial reporting and audit process and oversees the maintenance of sound internal control and risk management systems.
Conflicts of Interest	may take many forms, actual or perceived, but generally arises when a person could use his or her position to a) influence the Group's business decisions in ways to give improper advantage or financial benefit to oneself and/to others, or b) to obtain for oneself and/or others a financial benefit beyond the compensation he or she is authorized to receive for performing his or her responsibilities.
Fraud	means an intentional dishonest act or omission carried out with the purpose of deceiving, inducing a course of action or the making of false statements, orally or in writing, with the objective of obtaining money or other benefits from the Group, or of evading a liability to the Group. Fraud is not restricted to monetary or material benefits. This definition includes monetary gain and any benefit that could be gained from the Group.
Group	refers to DP World Limited, its subsidiaries and any company or entities managed or operated by them.
Group Internal Audit	refers to an independent body established by The DP World Limited Board of Directors with oversight by the DP World Limited Board Audit and Risk Committee.
Investigation	a process designed to gather and analyse information, to determine whether a fraud incident report is substantiated, or if any dishonest or unethical acts have occurred and if so, the party or parties responsible.
Management	this includes all Executive Management of the Group at every level and location, this includes but is not limited to, SVPs, VPs and Heads of Departments or Divisions.
Malicious	an unfounded and untrue report made that is characterized by malice, hatred, and disregard or to be deliberately harmful or spiteful.
Recklessly	where an act has taken place in such a manner that the party carrying out the act is indifferent to or disregarding of the consequences. Some form of loss is usually associated with acts of recklessness. Recklessly also means being neglectful, careless, thoughtless and unconcerned.
Stakeholder	in this policy context means any employee, (direct and indirect), partner, customer, any person or entity involved in the Group's supply chain, as well as members of the public who wish to express any sort of concern about the Group's business integrity.

Whistleblower	a person, who is, or represents, a stakeholder and who raises a genuine concern in 'good faith' and discloses information of suspected wrongdoing.
Whistleblowing	<p>the disclosure of information which relates to suspected wrongdoing, and not information disclosed maliciously, recklessly or for personal gain. This may include:</p> <ul style="list-style-type: none">○ Criminal activity○ Miscarriages of justice○ Danger to health and safety○ Damage to the environment○ Failure to comply with any legal or professional obligation or regulatory requirements○ Bribery○ Financial fraud or mismanagement○ Negligence○ Breach of DP World internal policies and procedures including breaches concerning Human Rights and any form of trafficking.○ Conduct likely to damage DP World's reputation○ Unauthorised disclosure of confidential information○ The deliberate concealment of any of the above matters.

Approved by: Group Chairman and CEO
Fraud Risk Services
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**ALL QUERIES IN RELATION TO THIS
POLICY SHOULD BE DIRECTED TO
THE HEAD OF FRAUD RISK SERVICES AT**

FRS@dpworld.com