

## DP WORLD SAINT JOHN, INC.

### FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

#### REPORT FOR THE FINANCIAL YEAR ENDING DECEMBER 31, 2023

##### Introduction

This report is made in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (Canada) (the “*Act*”) for DP World Saint John, Inc. (“**DP World Saint John**”). This report is for the fiscal year ending December 31, 2023 (“**2023**”).

##### Our Business

DP World Saint John is in the business of international marine terminal operations, short-sea shipping, and international logistics and freight forwarding. DP World Saint John operates a terminal in the Port of Saint John located in New Brunswick. The supply chain for DP World Saint John includes purchases of goods and services to support our terminal operations, including port infrastructure, equipment (including cranes and handling equipment), labour and information technology. Most of our suppliers are Canadian based. Our supply chain imports include equipment and spare parts for terminal operations primarily from China, and to a lesser degree from Europe and the United States.

##### Modern Slavery Statement

DP World Saint John is part of a global DP World group of companies (“**DP World Group**”). The DP World Group has prepared the attached **Modern Slavery and Human Trafficking Statement** (the “**Modern Slavery Statement**”), dated March 7, 2024, according to the UK *Modern Slavery Act 2015* and the Australian *Modern Slavery Act 2018*. Since the information in the Modern Slavery Statement applies to DP World Saint John’s activities and supply chains, it is incorporated into this report for the purpose of the *Act*.

The Modern Slavery Statement describes the DP World Group’s business, policies and procedures, due diligence practices, assessment of risk and effectiveness practices, and training related to forced labour and child labour. It also describes specific steps taken in 2023 to prevent and reduce risks of child labour and forced labour in the DP World Group’s operations and supply chains. Since the majority of activities and policies to prevent or reduce forced labour and child labour in DP World Saint John’s operations and supply chains are set or implemented at the broader DP World Group level, the Modern Slavery Statement describes the relevant information for the purposes of this Report for DP World Saint John.

##### Supplementary Information

The information below supplements the Modern Slavery Statement for the purpose of DP World Saint John’s reporting pursuant to section 11 of the *Act*.

In addition to the training described in the Modern Slavery Statement, some DP World Saint John employees are required to take training with respect to forced labour and child labour on an annual basis, including members of our procurement team and legal department.

Also, given that DP World Saint John has not identified any instances of forced labour or child labour in our activities or supply chains, we have not taken any measures to remediate occurrences of forced labour or child labour or any losses of income to the most vulnerable families.

This report, including the attached Modern Slavery Statement, constitutes DP World Saint John's report for the fiscal year ending December 31, 2023.

This report is approved and attested pursuant to subsections 11(4)(b)(ii) and 11(5) of the *Act*.

I have the authority to bind DP World Saint John, Inc.



Douglas Smith

Chief Executive Officer

May 28, 2024

# Modern Slavery and Human Trafficking Statement

## Introduction

DP World aims to ensure secure and resilient societies and communities wherever we operate. Our data-driven logistics transform business and help us lead the future of global trade, enabling the most productive, efficient, sustainable and safe trade solutions globally. This is as important commercially as it is to the societies where we live and work. As a global employer, DP World strives to improve people's lives, strengthen communities and protect the environment. We do not tolerate slavery, servitude, forced labour or human trafficking anywhere in our operations or supply chain.

*Sultan Ahmed Bin Sulayem, Group Chairman and CEO*

## Our organisation

DP World enables global trade through a network of ports, terminals, parks, logistics and economic zones, maritime services, and digital technology solutions. Our dedicated team of over 108,000 employees in 75 countries partners with governments, shipping lines, importers and exporters, communities, and many essential constituents of the global supply chain, adding value and providing quality services today and tomorrow.

In 2023, DP World handled more than 81 million TEU (twenty-foot equivalent units) across our portfolio. With its committed pipeline of developments and expansions, the current gross capacity of 95 million TEU is expected to increase depending on market demand.

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

Our commitment to ensuring that there is no modern slavery or human trafficking anywhere in our business and supply chains globally is delineated in our Group Policies. DP World's annually revised Modern Slavery and Human Trafficking Policy describes our approach within the organisation and with our suppliers. The policy also explains how our employees can report any suspected incidents.

Key policies and procedures concerning modern slavery and human trafficking include:

- Regularly monitoring key strategic risks as part of our ESG commitment and reporting these to Senior Management, the Audit and Risk Committee and the Board of Directors. These risks include threats to human rights and ensuring that we conduct ethical business activities.
- Our Human Rights Policy and Statement, establishing a framework for our actions and informing stakeholders of our position on human rights.
- Our Whistleblowing Policy, setting forth a system in which employees and third parties, including employees from suppliers and vendors, can securely report concerns, suspicions or knowledge of misconduct or unethical behaviour, including any concerning slavery, human trafficking and human rights violations. Reporting parties are protected from retaliation in any form.
- Procurement policies and procedures that guide our global business units to manage local supply chains effectively. These set out minimum criteria for DP World's approved vendors, including provisions prohibiting modern slavery, human trafficking, and child/ forced labour.
- Modern slavery and human trafficking tender conditions as standard contract clauses in our tender and contract documentation. This further improves compliance with our modern slavery and human trafficking policy.

- Our Global Code of Ethics, which underlines our commitment towards Human Rights, taking into account the ten principles of the UN Global Impact, updated in 2023.
- Company standards, policies and procedures, setting out employees' obligations and the process to report suspected and known incidents of modern slavery and human trafficking, and consequences for failure to report.
- Policy compliance is monitored internally by management and independently assessed by Internal Audit.

We are a signatory to the United Nations Global Compact (UNGC) and its ten principles, encompassing human rights, labour, the environment, and anti-corruption. We also joined the World Economic Forum's Stakeholder Capitalism Initiative and report against their metrics and disclosures, focusing on four themes: People, Planet, Prosperity, and Principles of Governance.

In 2023, we also published a declaration of basic human rights in line with the German Supply Chain Due Diligence Act, which requires all companies in Germany with more than 3,000 employees to comply with basic human rights standards, such as the prohibition of child and forced labour, and environmental standards throughout the value chain. In Europe, we are also bringing in new capacity to strengthen our Human Rights assessment and monitoring capabilities.

DP World has established a Human Rights Working Group and developed and implemented a Human Rights framework and associated policy. The eradication of modern slavery is integral to our human rights approach. In addition, we recognise and support the UN Guiding Principles on Business and Human Rights. We intend to continually enhance our approach to Human Rights and broaden the group's range of procedures and programmes.

## **Our Due Diligence**

Our due diligence follows a risk-based approach to selecting, onboarding and monitoring third parties within the standards established by our Supplier Code of Conduct and other relevant third-party due diligence procedures, including considerations related to modern slavery or human trafficking non-compliance. In 2024, we plan to publish an updated code with more stringent requirements on decarbonisation, environmental impact, anti-competitive behaviour, and fair labour practices.

We seek to partner with suppliers whose ethical principles align with ours and expect them to operate under fair and ethical work practices. Our vendor management processes include establishing a Supplier Self-assessment on Modern Slavery and Human Trafficking, maintaining a Vendor Code of Conduct, and factoring any significant non-compliance for prospective vendors' modern slavery or human trafficking risk into our procurement decisions. This Supplier Self-assessment enables us to review, analyse and implement risk mitigation strategies for any significant non-compliance of Modern Slavery and Human Trafficking in our Global Supply Chains.

## **Risk Assessment**

The risk of modern slavery and human trafficking varies by location and sector. DP World has, therefore, created a working group to address emerging issues. This working group has identified procurement, third-party contractors, and the use of ports by human traffickers as the highest-risk areas for DP World.

To mitigate these risks, we have increased our oversight and requirements for vendors and third-party contractors concerning modern slavery and human trafficking. Our security teams work closely with global and local law enforcement agencies to proactively enhance supply chain security and prevent human traffickers from

using DP World's terminals and facilities. We continuously improve our security management systems, implement robust risk management programmes, deploy innovative security technologies, conduct internal and external audits, and provide awareness training on modern slavery and human trafficking indicators, particularly in combination with other criminal activities. Group Security has rolled out a security risk register detailing human trafficking as a separate item, enabling each BU to assess this risk and place specific mitigation measures to reduce this threat.

As well as implementing and acquiring mandatory security regulatory accreditations like ISPS Code, DP World has raised its security benchmark by implementing and accrediting to ISO 28000 (Security and Resilience, Security Management System) and other Global Security Initiatives across its portfolio, such as the Custom-Trade Partnership Against Terrorism (CTPAT), Authorized Economic Operator (AEO), Transported Asset Protection Association (TAPA) and Container Security Initiatives, (CSI) further mitigating human trafficking threats in our terminals and facilities.

## **Training**

We continuously work on building and maintaining awareness and understanding amongst our employees, workers, and contractors of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, the German Supply Chain Due Diligence Act and other modern slavery regulations around the world and providing the tools to identify potential issues. We currently report our performance against Human Rights, Forced Labour and Child Labour disclosures within our annual ESG Report. Over time, we will seek to 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.

Where appropriate, information on modern slavery and human trafficking is provided to port workers at operational briefings. Such training is mandatory and is part of one of the six online courses which are part of the induction for new employees. Furthermore, a human rights training and online awareness module will also be rolled out globally.

Posters are provided in various languages to each business unit to raise awareness and remind employees of the signs of modern slavery and human rights violations and how to report suspected incidents.

This statement is made according to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. It constitutes DP World's modern slavery and human trafficking statement for the financial year ending 31 December 2023 and has been approved by DP World's board of directors.

Sultan Ahmed Bin Sulayem

Group Chairman and CEO

07 March 2024

