



Modern Slavery and Human Trafficking Policy

Approved by: DP World PLC Board

Department: Group Company Secretariat

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1. Introduction

Modern slavery is a violation of fundamental human rights and a criminal offence under the legislation of many countries. It constitutes the deprivation of one person's liberty by another to exploit them for personal or commercial gain.

DP World is committed to acting ethically and with integrity in all its business dealings and relationships and is committed to putting measures in place to prevent modern slavery and human trafficking existing within the Group operations and supply chain globally.

2. Purpose

The purpose of this policy is to mitigate the risks associated with any act of modern slavery and human trafficking within the Group and its contractors by clearly stating the position of DP World with regards to both modern slavery and human trafficking and the actions which might result due to any violation of the same.

3. Scope

This modern slavery and human trafficking policy ("Policy") applies to all DP World employees and contractors, as DP World expect all those in its supply chain to comply with this commitment. It does not form part of an employee's or contractor's contract of employment, unless specifically noted in such contracts, and does not create contractual rights or obligations.

This Policy may be amended or withdrawn by DP World at any time.

4. Policy

4.1 Minimum labour standards

DP World takes steps to procure that none of its employees, JV partners or suppliers impose or knowingly facilitate the imposition of forced or compulsory labour for DP World's ultimate benefit. DP World treats its workers with the utmost dignity and respect and upholds the highest standards of human rights (including the right to freedom of association, where legal in the relevant jurisdiction). All applicable laws and regulations relating to work and the workplace (including those relating to the payment of wages and compensation and working time) must be complied with.

Under no circumstances should any of the following occurrences be tolerated:

- failure to provide a written contract to workers in a language that they understand;
- withholding of workers' original government-issued identification and travel documents except where doing so is required by law. In such cases, workers should always understand how to request the return of their documentation;
- imposition of unreasonable restrictions on movement within or upon entering or exiting the workplace or other work-related facilities;
- use of child labour and/or the engagement of any workers who are younger than the legal minimum age for employment in the relevant jurisdiction;
- withholding of workers' salaries or deduction of money from wages for reasons beyond their control;
- prohibition against taking entitled holiday (whether paid or unpaid);
- failure to provide adequate training, including necessary health and safety training, and protective clothing or equipment;

- forcing workers to work longer hours than set out in their contracts without choice and appropriate compensation; and
- retribution against workers who make complaints/ reports about their treatment.

4.2 Investigation and remediation of modern slavery and human trafficking

DP World's Procurement team will ensure that tenderers' compliance with applicable modern slavery and human trafficking legislation, regulations and codes is factored into procurement decisions. The Procurement team will also be responsible for reviewing suppliers' compliance with this Policy and DP World's Vendor Code of Conduct once suppliers are retained and join the approved vendor pool.

DP World's Internal Audit team will conduct policy compliance 'health checks' within their annual internal audit plan. This will be targeted to locations where management has identified significant areas of risk of modern slavery and human trafficking within DP World's functions and jurisdictions.

4.3 Action to be taken if a supplier is found to have been involved in modern slavery

DP World takes violations of this Policy seriously, and strongly encourages its suppliers to comply with its terms. Where a non-compliance is identified or reported, DP World expects its suppliers to implement appropriate corrective actions promptly. DP World reserves the right to take all actions it deems necessary and proportionate to any breach of this Policy depending on its nature.

4.4 Contractual obligations and due diligence requirements

DP World will seek to include provisions in its commercial agreements with third parties to provide it with appropriate comfort that the relevant counterparty conducts its business and operations in a manner that is consistent with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force from time to time.

4.5 Training

A training module has been developed 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, and in pictorial form by providing awareness posters to each port.

4.6 Reporting

If any party subject to this Policy at any time discovers or suspects the existence of modern slavery or human trafficking in any part of DP World's operations or global supply chain, the situation shall be reported to the DP World Whistle Blower Hotline.

5. Contact Information

Should you have any questions regarding this policy, please contact:

Group Company Secretariat:

Email: secretariat@dpworld.com

Whistleblowing:

Hotline – Intranet: www.dpworld.com/whistleblowing

Email: dpworld@expolink.co.uk

Telephone: +44 1249 661808

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

DP World

Group Internal Audit Department

Attention: Group Head of Fraud Risk Services

PO Box 17000

Jebel Ali Free Zone
Dubai, UAE

Direct Reporting: All staff have the option of reporting direct to their respective business unit line manager, or please approach the Group Head of Fraud Risk Services or a member of the Fraud Response Team within Group Internal Audit at:

Group Internal Audit Department
4th Floor, Building 17
DP World
Dubai, UAE
Jebel Ali Free Zone

6. Related Standards, Policies and Processes

This policy should be read in conjunction with the Global Whistleblowing Policy.

7. Definitions and Terms

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

DP World	DP World PLC and all associated subsidiaries.
Group	DP World PLC and all associated subsidiaries.
JV	Joint Venture.

8. Revision History

Version Number	Review Date	Summary of Changes
V1.0	08/12/2016	First Version
V2.0	14/03/2017	Section 4.2 – wording amended covering internal audit scope.
V3.0	12/03/2019	Annual review with the adoption of the new Policy template.