

# **Modern Slavery and Human Trafficking Statement**

#### 1 Introduction

DP World is committed to being a world leader in sustainability. Guided by our values of courage, respect, intelligence and pride, and our practice of thinking ahead, foreseeing change and innovating, 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 their communities and protecting their 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.

## 2 Our organisation

DP World is comprised of 78 marine and inland terminals across six continents. Our dedicated team of over 36,500 employees from 103 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.

Container handling is the company's core business and generates more than three quarters of its revenue. In 2016, DP World handled 63.7 million TEU (twenty-foot equivalent units) across our portfolio. With its committed pipeline of developments and expansions, the current gross capacity of 84.6 million TEU is expected to rise to more than 100 million TEU by 2020, in line with 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 group-wide. At the end of 2016 we launched a modern slavery and human trafficking policy in conjunction with this statement. This sets out our approach to modern slavery and human trafficking in our organisation and in relation to our suppliers, and highlights 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:

 General Procurement Policy, 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 added a supplier self-assessment on modern slavery and human trafficking to our vendor screening process. Going forward, a prospective vendor's modern slavery or human trafficking risk will be factored into our procurement decisions

Policy compliance will be 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 will seek to include 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) some of our suppliers and operations for modern slavery and human trafficking and other risks.

We have a 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. We commenced a due diligence review of our own operations in February 2016, which included the creation of a working group to address any 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 has worked with global law enforcement agencies to improve supply chain security and prevent human traffickers from using DP World's terminals. This includes enhancing our management security teams' processes using audits conducted by 3<sup>rd</sup> party accreditation, providing awareness training on how to identify indicators of modern slavery and human trafficking, particularly in combination with criminal activities, and providing our support to these agencies.

#### 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 on giving them the tools to flag potential issues. 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

Senior members of DP World's procurement, internal audit and global security teams have attended training on compliance with the UK Modern Slavery Act 2015 provided by the Gangmasters Licensing Authority.

More broadly, we have developed a training module on the indicators of modern slavery and human trafficking which all DP World email network users are required to complete and information on modern slavery and human trafficking is also being provided to port workers at operational briefings, where appropriate. Posters have been 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 2016. It has been approved by DP World's board of directors.

Sultan Ahmed Bin Sulayem Group Chairman and CEO 23 March 2017