

# 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 businesses and help us lead the future of global trade, enabling the most productive, efficient, sustainable, and safe trade solutions. 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, child labour or human trafficking anywhere in our operations or supply chain. We recognise our responsibility to respect internationally accepted human rights and to conduct our business with integrity, transparency, and accountability.

*His Excellency Essa Kazim, Chairman of the Board of Directors*

## 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 126,000 employees in 84 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 in the future.

In 2025, DP World handled more than 93 million TEU (twenty-foot equivalent units) across our portfolio. With its committed pipeline of developments and expansions, the current gross capacity of 108 million TEU is expected to increase depending on market demand.

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

DP World's approach to actively combating modern slavery or human trafficking across its global operations and supply chains is delineated in our suite of Group Policies. Our Modern Slavery and Human Trafficking Policy sets out our collective approach to identifying, preventing, and addressing modern slavery and human trafficking within the organisation and across our supplier relationships. This policy, which is reviewed and approved by the Board of Directors annually, also specifies the channels through which any party subject to the policy (including employees, suppliers and other third parties) can raise concerns or suspicions of modern slavery and human trafficking.

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

- Regularly monitoring key strategic risks as part of our overarching sustainability commitment and reporting these to Senior Management, the Audit and Risk Committee and the Board of Directors. These risks include threats to the dignity, well-being and human rights of our employees, workers in our value chain, and communities affected by our operations; reinforcing our principles of ethical business conduct.
- Our Human Rights Policy and Statement establishes a framework for our actions and informs stakeholders of our position on human rights. This policy is aligned with the United Nations ("UN") Guiding Principles on Business and Human Rights and the International Labour Organisation's ("ILO") core conventions.
- Our Whistleblowing Policy provides accessible channels for all stakeholders to securely report concerns, suspicions, or knowledge of misconduct or unethical behaviour, including any concerning slavery, human trafficking, and human rights violations, ensuring that reports are taken seriously, investigated promptly, and handled confidentially. It protects the identity of whistleblowers and safeguards those who report in good faith from retaliation.



- Our Global Recruitment Policy embeds our commitment to preventing modern slavery and human trafficking by designing and implementing ethical recruitment and selection processes that include fair hiring practices, transparency, the prohibition of recruitment fees, and adherence to applicable labour laws across all jurisdictions.
- Our Procurement policies and procedures, for example, our Responsible Sourcing Statement and Vendor Code of Conduct, 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 provisions are included as standard contract clauses in our procurement contracts and tender-related documentation. This further improves compliance with our Modern Slavery and Human Trafficking Policy.
- Our Global Code of Ethics Policy underlines our commitment towards human rights and aligns with the relevant principles of the UN Global Compact (“UNGC”), the Universal Declarations of Human Rights, ILO, Guiding Principles of Business and Human Rights, the UN “Protect, Respect, and Remedy” Framework, IFC Performance Standards on Environment & Social Sustainability and the UN Sustainable Development Goals (SDGs).
- 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.
- Compliance with our policies relating to modern slavery and human trafficking is overseen internally by management and subject to independent review 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. Addressing the risks of modern slavery is a fundamental aspect of 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 across our operations, globally.

In 2025, we updated our Vendor Code of Conduct to include more stringent requirements on human rights due diligence and to allow us to further monitor our supply chain beyond our directly contracted suppliers.

In line with the German Supply Chain Due Diligence Act (LkSG), we continue to ensure risk management, appropriate oversight and operational implementation, and to monitor compliance with human rights requirements. We report on our progress annually in line with the expectations of Germany’s Federal Office for Economic Affairs and Export Control (BAFA). In Europe, we have appointed an Affected Communities Manager to monitor and evaluate the business and human rights landscape. The role entails developing appropriate strategies and providing guidance on matters including modern slavery and human trafficking. This workstream also includes collaboration with DP World’s head office and regional offices outside Europe to advance human rights due diligence (“HRDD”) on a global scale, as well as fostering a continuous exchange of information and a proactive HRDD community. Europe has also published its first region-specific Modern Slavery Transparency Statement (year ending 31 December 2024). This outlines the governance framework aimed at preventing forced labour and human trafficking across our European operations and supply chains, and reports progress through training metrics, third-party engagement, and the ongoing development of our human rights and modern slavery programme.

A human rights gap assessment was concluded in 2025 to evaluate the extent to which existing policies, processes, and operational practices align with internationally recognised human rights standards. The outcomes of this assessment helped the group to identify priority areas for improvement and define the following actions to strengthen governance, risk management, and operational practices.

A site-level human rights risk assessment was conducted for three of our sites to understand how our operations may affect people at and around each site. The assessment looks at key areas such as safety and wellbeing, labour rights, diversity and inclusion, responsible procurement and community impacts. The results will be used to identify actions, strengthen safeguards, close gaps, and support the continuous improvement of the embedding of human rights considerations across site operations.

## **Our Supplier Due Diligence**

Our supplier due diligence takes a risk-based approach and considers region, sector, supplier maturity and business relationships to ensure that we effectively prevent and mitigate risks for modern slavery and human trafficking in our supply chains. This will enable us to prioritise the highest-risk suppliers and sectors for additional self-assessments, mitigation strategies, and direct engagement. In 2026, we plan to expand our supplier due diligence process to further align with our updated Vendor Code of Conduct, both when onboarding suppliers and by continuously monitoring supplier adherence to our Vendor Code of Conduct.

We have partnered with a supplier due diligence platform that has helped us risk-assess 500 global suppliers. The assessment highlighted that the most inherent risks for human rights are within the construction and production of strategic equipment. We will continue to assess our suppliers by conducting onsite visits and third-party audit pilots.

We initiated a collaborative supplier engagement program, which identified that suppliers have an understanding of human rights and modern slavery, while expressing an interest in support to implement due diligence processes related to their own supply chains. Therefore, we will initiate a supplier capacity-building program in 2026 to support our suppliers in further mitigating our joint modern slavery risk.

## **Risk Assessment**

The prevalence 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 vendor pre-qualification and due diligence, 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 business unit to assess this risk and place specific mitigation measures to reduce the 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 and contractors regarding modern slavery, human trafficking and human rights risks and impacts. This includes adherence to global standards and compliance with all relevant modern slavery and human rights regulations, both existing and emerging, across the jurisdictions in which we operate. We currently report our performance on Human Rights, Forced Labour, and Child Labour disclosures in our annual Sustainability 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 all new employees. In addition, as part of our efforts to improve internal coverage and raise general awareness, we published an e-learning module on human rights in 2025, which assists in sensitising employees to DP World's human rights commitments, promoting fairness, equality and inclusivity and complementing the aforementioned compulsory Modern Slavery and Human Trafficking e-learning module. Furthermore, posters in various languages are provided to each business unit to raise awareness and remind employees of the signs of modern slavery and human rights violations, and of how to report suspected incidents.

## Employee Wellbeing and Zero- Harm Approach to Safety

Our recruitment and induction procedures ensure all employees are legally permitted to work and meet minimum employment standards. DP World recognises that some of our operations occur in a high-risk environment, which may expose personnel to various safety hazards. To manage these risks, we have dedicated human resources, industrial relations, and specialised work health and safety teams, including injury management and return-to-work support. Aligned with our Zero Harm commitment to environmental protection and ensuring everyone returns home safely, we uphold rigorous health, safety, and environmental standards, including targeted field-based risk programs, safety initiatives, and ongoing internal and external audits of our risk controls.

This document constitutes DP World's modern slavery and human trafficking statement for the financial year ending 31 December 2025 and has been approved by DP World's Board of Directors.



His Excellency Essa Kazim,

Chairman of the Board of Directors

09 March 2026