



DP World Australia Modern Slavery Statement

FY 2021

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DP World Australia Modern Slavery Statement FY 2021

ABOUT THIS STATEMENT

DP World Australia (Holding) Pty Ltd (DPWA) strives to play a positive role in the communities in which we operate. As a major employer, we aim to have a positive impact on people's lives, strengthening the communities in which we do business and minimising any impact we have on the environment. DPWA is committed to acting ethically and with integrity in all of its business dealings and relationships.

At DPWA we are constantly evaluating measures that we are able to implement to both identify and prevent modern slavery and human trafficking that may exist within our operations and/or the supply chain where we may bear influence. We also expect all parties in our supply chain to share this commitment.

DPWA is an Australian company registered at Level 40, 25 Martin Place Sydney NSW, Australia. This statement has been prepared for DPWA as parent company and principal governing body of the DP World Australia Group of companies and on behalf of those entities constituting reporting entities pursuant to the *Modern Slavery Act 2018* (the **Act**)¹.

This statement sets out the actions taken by DPWA to address modern slavery and human trafficking risks in our business and the supply chain in which we operate for the financial year ending 31 December 2021.

MANDATORY CRITERIA FOR MODERN SLAVERY STATEMENTS		PAGES
1	Identify the reporting entity	3 & 13
2	Describe the reporting entity's structure, operations, and supply chains	5 - 8
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	9 -10
4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	10 - 12
5	Describe how the reporting entity assesses the effectiveness of these actions	13
6	Describe the process of consultation with any entities the reporting entity owns or controls	13
7	Any other relevant information (COVID Response)	4

¹ The statement does not cover the non-controlled joint ventures AWH Pty Ltd and 1-Stop Connections Pty Ltd.

DPWA and COVID

As an established leader in the logistics industry, DPWA has seen first-hand the impact of the Covid-19 pandemic over the last two years. The inter-connectedness and vulnerability of many supply-chain networks has become very apparent. DPWA is committed to strengthening long-term partnerships that help to solve cargo movement challenges, deliver consistency, drive value and growth by continually investing in talent and technology. We understand the future of global trade and we therefore work tirelessly to enable the smooth flow of goods, resources, and people around the world.

Our Covid Response

The health and safety of all our employees is paramount. In response to the Covid pandemic, we implemented flexible work for non-operational employees, and we implemented various distancing and cleaning protocols for the operational employees. We also implemented a vaccine mandate to ensure the ongoing safety of our people and to maintain our operational continuity. Additionally, teams were established to manage the implementation of anti-infection procedures and Government Health updates were regularly communicated to all employees.

1. INTRODUCTION

During FY 2021 we commenced a process of identifying potential modern slavery risks in our operations and supply chains. We then considered how to best address these risks in line with the DP World responsible business, environment and sustainability priorities² and the requirements of the Act. More specifically, we undertook the following:

- Tier 1 Supply chain risk identification (refer diagram on Page 5).
- Assessment of the controls which we have in place to mitigate the identified risks.
- Conduct of a random desktop audit of key suppliers and customers and we developed action plans to address identified gaps; and
- Conduct of an audit of our template contracts to ensure they contained modern slavery clauses, audit rights and breach notification obligations.

² which may be found on our global website and in our annual reports, refer to the [DPW Annual Reports](#) on the [DP World website](#)

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

2.1 Structure

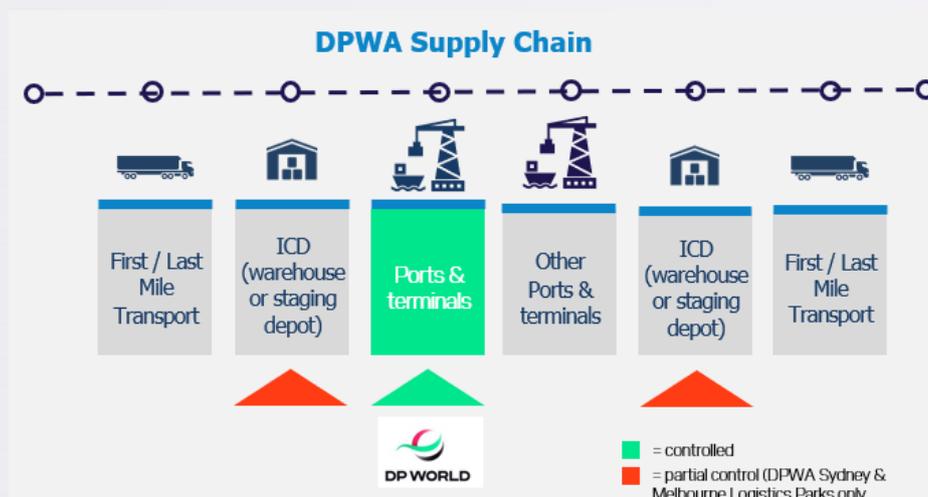
DPWA is part of the DP World Ltd group (DP World), which is a global logistics operation headquartered in Dubai, United Arab Emirates.

DPWA is headquartered in Sydney, Australia and has been operating in Australia for over 60 years³. DPWA has four container terminals nationally. In 2017 DPWA established a container park business in Sydney which expanded to Melbourne in 2021.

DPWA also has two non-controlled joint venture investments in an agricultural warehousing and logistics business (AWH Pty Ltd) and in an innovative supply chain technology solution business (1-Stop Connections Pty Ltd)



2.2 Supply Chain



³ Historically as Peninsular & Oriental Steam Navigation Company (P&O) before joining the DP World group in 2006

2.2 Suppliers

In 2021 DPWA worked with over 980 suppliers with an annual approximate supplier spend of \$198m (AUD).

The majority of our direct procurement spend in FY2021 was with suppliers registered and operating in Australia. DPWA procures goods and services from a range of suppliers across a variety of sectors including facilities, engineering, transport, security, information technology, consulting services administration supplies.

High-cost operating equipment such as quay cranes and moveable plant are sourced via the DP World global procurement process with these items predominantly sourced from China.

DP World has internal dedicated procurement teams both locally and internationally with established procedures.

Our Procurement department has established policies, procedures, and guidelines across all our divisions to effectively manage the supplier life cycle and govern the supplier relationships. They include:

- DPWA Procurement Principles & Policy
- DPWA Anti-Bribery & Corruption Policy
- DPW Modern Slavery Policy
- DP World Group Procurement Policy
- DP World Vendor Code of Conduct
- Vendor Removal and Suspension process

Our standard contractual terms with suppliers includes a requirement that goods and services are provided or supplied in accordance with applicable laws and contains a specific modern slavery clause, audit rights and breach notification obligations. Our review has highlighted that eighty one percent of DPWA suppliers on a Goods and Services Agreement use the standard DPWA terms and conditions.

Our vendor partners are screened via our internal procurement policies and procedures. DPWA terms of tender is a precondition for potential vendors and the process requires that such tenderers complete a questionnaire that includes a modern slavery and human trafficking self-assessment. If the criteria are not satisfied the vendor has the chance to remedy or is removed from tender process.

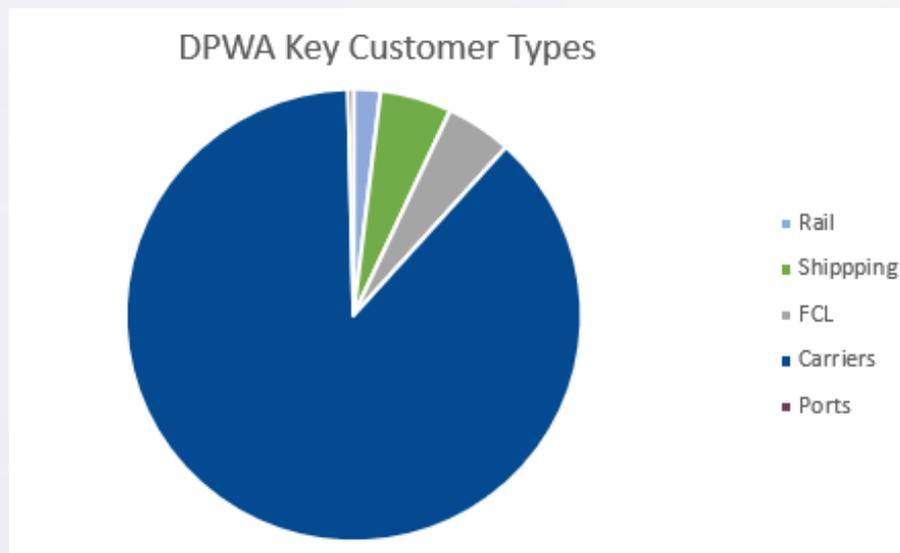
Once suppliers have been approved via the tender process and are engaged by DPWA, they are required to comply with DPWA policies and code of conduct. These policies are also available in the externally facing contractor management system and we expect that vendors are familiar with the policies and the requirements contained therein and from FY22 our action plan includes a requirement that we will expand our top tier review by conducting spot checks or audits of our suppliers and enhance communication to them of our policies and compliance expectations.

Furthermore, we have a confidential, externally administered, whistleblowing hotline available to all DPWA employees and third parties which can be used to report suspected violations of human rights. Anyone who makes a report is protected from retaliation in any form.

2.3 Customers

DPWA has a variety of customers and methods of engaging them. Our customers are primarily shipping lines, road and rail operators and shippers which are engaged through the following agreement formats:

Customer	Agreement type
Shipping Lines	Terminal Services Agreement
Terminal and Container Park access by Trucks	Carrier Access Agreement
Terminal and Container Park access by Rail	Rail Access Agreement
Container Park customers	Container Park Agreement



Customer numbers by division			
Terminals		Logistics	
Customer composition		Customer composition	
Road Carriers	694 (95%)	FCL Customers	37 (63%)
Shipping Lines	28 (4%)	Shipping line customers	12 (20%)
Rail Customers	5 (1%)	Rail customers	10 (17%)
Total	734	Total	59

Predominantly DPWA deals with Australian based agents of its shipping line customers with many headquartered outside Australia.

The Asia Pacific region has the second highest prevalence of modern slavery in the world with a high prevalence of forced labour and the highest number of victims across all forms of modern slavery.⁴ Consequently, we conducted a desktop review of our key shipping customers that showed 50% are headquartered in at risk countries with 38% headquartered in countries assessed as having a high vulnerability of modern slavery. Our desktop audit found that:

⁴ <https://www.globallslaveryindex.org/2018/findings/regional-analysis/asia-and-the-pacific/>

- 70% of our customers have a Modern Slavery framework
- 1 customer is a member of the UN Global Compact
- 42% of our customers have published Modern Slavery statements and sustainable procurement policies

All of our template customer Agreements include a Modern Slavery clause, and we require audit rights and obligations upon customers to notify us of any breach of these provisions.

2.4 Operations

DPWA continues to be a key stevedore and logistics provider to our customers ensuring service reliability for its part in the Australian supply chain and regularly moves over 10,000 Twenty-foot Equivalent Unit (TEU's) daily.



4 Container Terminals and 2 Logistics Parks across 4 states



3.2 million TEU's handled in 2021



1261 vessels handled in 2021

DPWA employs approximately 1750 people, has recruitment and induction policies and procedures to ensure that all employees meet minimum employment requirements and are eligible to work under Australian law. At least 84% of our employees work under one of the eight (8) different enterprise agreements (EA's). The enterprise agreements are current and are required to pass the BOOT test, the EA rates are significantly higher than the comparable Modern Award rates. DPWA has dedicated internal human resources and industrial relations expertise.

Approximately 1% of our employees are either fixed term/casuals, the majority of the casuals are covered by EA terms and conditions.

From time-to-time DPWA utilises indirect hiring via recruitment agencies. DPWA has a relationship with large reputable recruitment agencies who conduct their own background checks on candidates which includes the right to work. DPWA undertakes VEVO Checks on direct hired employees with visas. During 2021 we only engaged five (5) employees of the total employee population with working visas.

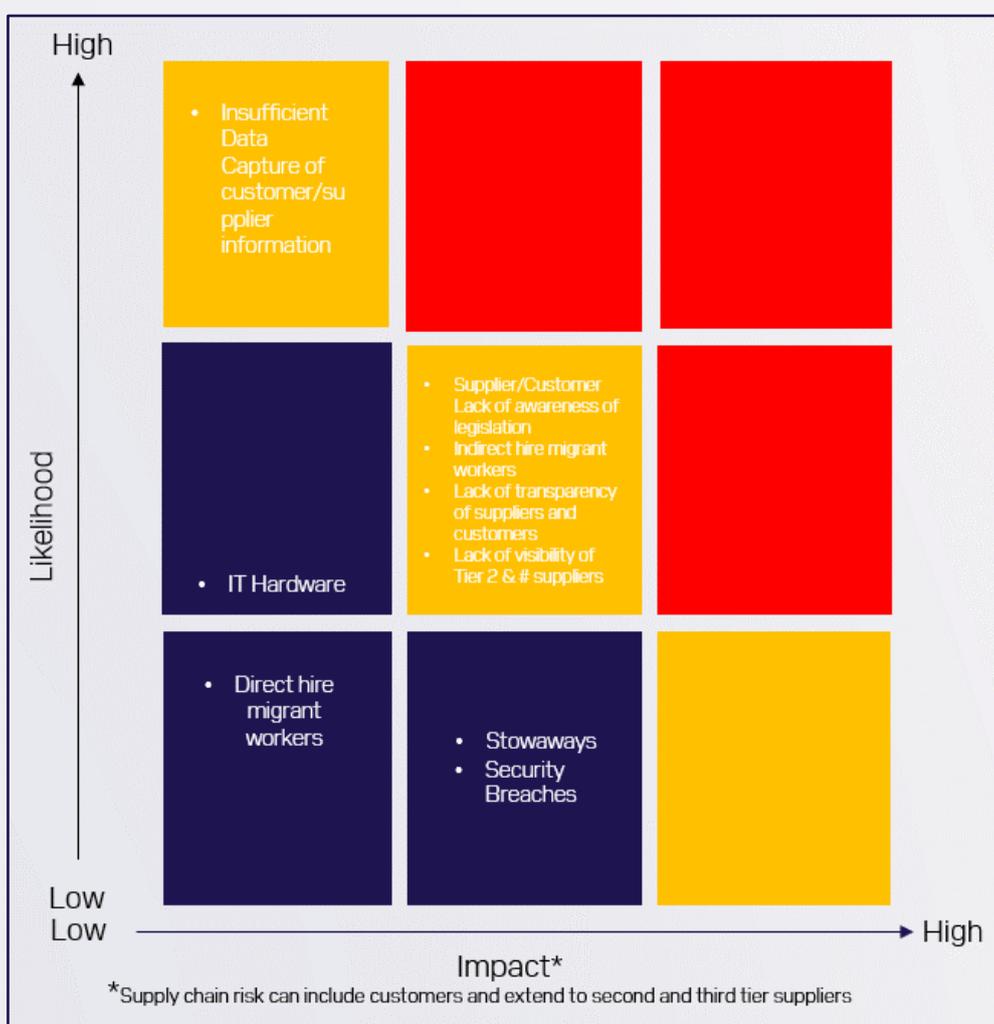
3. IDENTIFYING AND TAKING ACTION TO ADDRESS MODERN SLAVERY RISK

Identifying, measuring, and mitigating risk in our business and supply chains

DP World has an established working group to address emerging issues across its global portfolio. This working group has identified that, in the context of modern slavery risk, the following are the highest risk areas for the business globally:

1. procurement,
2. third party contractors and
3. the use of our ports by others for human trafficking purposes.

In addition to this DPWA has conducted its own risk identification exercise and has identified the following risks.



DPWA has reviewed the controls that it has created around these risks and updated the 2022 actions to reflect the areas that require further focus as a result of the risk review (refer to Section 5).

4. OUR APPROACH

4.1 Our policies and governance approach



Our commitment is to ensure that our business and the supply chains within which we operate are free from the risk of modern slavery and human trafficking. In 2019, DP World became a signatory to the United Nations Global Compact (UNGC) and its ten principles, encompassing human rights, labour, the environment, and anti-corruption. As a signatory, DP World commits to aligning its strategies and operations with these principles.

In line with its commitments under the UNGC, DP World established an internal Human Rights Working Group in 2019 and developed and implemented a Human Rights framework and associated policy. The eradication of modern slavery is integral to our human rights approach. We intend to further integrate our approach in these areas and broaden the group's range of procedures and programmes.

Control Risks was engaged by DP World Ltd to conduct a whole of company risk review and assessment of the level of sophistication in the management of modern slavery and human trafficking risks.

Policy compliance is monitored internally by management and independently assessed by Internal Audit during planned business audits. The DPWA approach is overseen by the DPWA Audit & Risk Sub Committee of the Board of Directors. While our progress against commitments has been impacted by Covid-19, we have made inroads and continued to identify opportunities for process improvement.

The DP World Modern Slavery and Human Trafficking Policy sets out our approach to modern slavery and human trafficking both in our organisation and in relation to our suppliers and customers. The policy also clarifies the steps that any individual can take if they have concerns about the existence of any such incident. Our policy is reviewed annually. The Policy and statement are both available on our website.



Safety and Security

The industry we operate in has a considerable interaction between people and heavy equipment, loads and falls from heights expose us to a range of health and safety hazards. Accordingly, we maintain up to date HSE standards, guidelines, and targeted field-based risk programmes along with extensive safety promotion activities. Risks and controls are reported on a regular basis, are internally and externally audited to ensure the safety of our people, environment, communities in which we work and stakeholder partners. Our goal is to make sure everyone goes home safe and the environment is protected and enhanced wherever possible. This must be accomplished with a Zero Harm approach in our business.

All DPWA container terminals have an approved Maritime Security Plan approved by the Department of Home Affairs. Each terminal has a nominated Landside Restricted Zone (LRZ) which they must control access to and from. There are CCTV systems in place to monitor the access control points. All access to the Landside Restricted Zones is controlled through the terminals access control system. All employee, contractors and Truck Drivers must hold a valid Maritime Security Identity Card (MSIC) to gain unescorted access to terminals LRZ. Any visitor or contractor accessing the LRZ without a valid MSIC must be under escort the whole time. Maritime security guards also undertake DPWA induction training in addition to Wilson Security induction. Specific Modern Slavery training will be incorporated in induction programs from 2022.

Education and training

DP World has a dedicated corporate governance team who have developed a Modern Slavery online learning module which is delivered to all email network users via our global learning platform called “iLearn.” The training is mandatory and is required to be completed annually.

Modern Slavery and Speak Up posters are displayed in multiple areas across all terminals, logistics and the Australian head office.

5. FY 2021 PROGRESS & 2022 PLANNED ACTIONS

Monitoring Progress on FY21 commitments

- Green - Complete
- Orange – Partially complete

Commitments	Status	Comment
Modern Slavery Training	●	Trained 86% DPWA leaders
	●	Continue training F22
Contractual Controls	●	Review of existing contracts for controls and gaps analysis
	●	Reviewed templates to ensure Modern Slavery template clause included
Security Risk	●	Risk Registers reviewed and updated for Modern Slavery specific security risks
Supplier Code of Conduct	●	Enhance communication of Supplier Code of Conduct to Tier One Suppliers which source from Modern Slavery higher risk countries, goods, or services

Priorities identified for F22

- Blue – New F22

Commitments	Status	Comment
Modern Slavery Training	●	Expand training to require that training of Security Guards be conducted (either by DPWA or the Contractor)
Making Speak Up Mechanism available for Suppliers	●	Communication campaign to Suppliers highlighting Whistleblower reporting lines and Modern Slavery awareness
Contractual Controls	●	As contracts fall due for renewal continue to address matters which were highlighted through the gap analysis
Supplier Management System	●	Introduce into the procurement process new categories of questions to capture additional data to assist evaluating modern slavery risk factors; ensure central recording of outcomes of modern slavery evaluation of suppliers; implement process for reporting to global procurement if a vendor assessment highlights negative results.
Industry Forums	●	Seek opportunities to attend and support forums where Modern Slavery content is discussed and bring back learnings and best practice for consideration of implementation by DPWA; Seek opportunities to highlight our Modern Slavery Commitments when speaking at industry forums.

Commitments	Status	Comment
Supply Chain MS Audit	●	Expand top tier review of suppliers to broaden capture
MS Working Group	●	Establish DPWA working group to ensure constant review of process and implementation of controls and risk mitigation plans and continue driving education around Modern Slavery risk and corporate commitments

6. ASSESSING CONTROL EFFECTIVENESS

The DPWA business continues to monitor several qualitative and quantitative indicators, such as the occurrence of:

- Supply chain education/guidance events i.e., through Industry Forums etc.
- Bid development and project delivery guidance

Quantitative indicators are being monitored and reviewed, such as:

- Employees completing training
- Assessed and completed supply chain prequalification's
- Non-conforming supply chain prequalification's
- Contracts with Modern Slavery clauses
- Whistleblower Protection Policy reporting events

7. CONSULTATION AND APPROVALS

Reporting entities

DPWA Group's reporting entities are set out below

<p>DP World Australia Group (DPWA) DP World Australia (Holding) Pty Ltd DP World Australia (Finance) Pty Ltd</p>	
<p>DP World Brisbane Pty Limited DP World (Fremantle) Limited DP World Melbourne Limited</p>	<p>DP World Sydney Limited DP World Australia Logistics Pty Limited</p>

Operating as an integrated group, all policies are the same across all entities in the group structure. The DPWA Board together with the executive leadership team provide guidance, governance, and risk management for the group in relation to, *inter alia*, Modern Slavery.

The Directors of the reporting DPWA Group entities comprise of common officeholders some of whom are also members of the senior management team. All have a deep understanding of the DPWA businesses, operations, and supply chains.

This statement has been approved by DP World Australia (Holding) Pty Ltd.'s Board of Directors.

A handwritten signature in black ink, appearing to read 'Glen Hilton', with a stylized flourish at the end.

Glen Hilton

DP World Australia (Holding) Pty Ltd, Chairman Board of Directors

29 June 2022