



DP WORLD AUSTRALIA MODERN SLAVERY STATEMENT

FY 2023

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DP World Australia Modern Slavery Statement FY 2023

1. ABOUT THIS STATEMENT, DPWA AND OUR REPORTING ENTITIES

This Modern Slavery Statement has been prepared pursuant to the requirements of the *Modern Slavery Act 2018* (Cth) (**the Act**) by DP World Australia (Holding) Pty Ltd (DPWA) for itself as parent company and principal governing body of the DP World Australia Group of companies (DPWA Group), and on behalf of its reporting entities as defined under section 14 of the Act, which are listed below:

- ❖ DP World Australia (Holding) Pty Ltd (ACN 147 892 715)
- ❖ DP World Australia (Finance) Pty Ltd (ACN 147 893 285)
- ❖ DP World Australia Limited (ACN 129 842 093)
- ❖ DP World Australia Container Parks Pty Ltd (ACN 103 736 705)
- ❖ DP World Brisbane Pty Ltd (ACN 130 876 701)
- ❖ DP World (Fremantle) Ltd (ACN 009 106 763)
- ❖ DP World Melbourne Ltd (ACN 000 049 301)
- ❖ DP World Sydney Ltd (ACN 001 351 159)

The DPWA Group is part of the DP World Limited Group, a leading global provider of ports and terminal services and smart logistics headquartered in Dubai, United Arab Emirates. As a global group, DP World is dedicated to making trade flow better, and changing what is possible for our customers and communities around the world.

At the core of our operations – we are committed to acting ethically and with integrity in all our business dealings, and as part of such commitment we strive to constantly identify risks of modern slavery that may exist within our operations and supply chain so that we can take measures to prevent such risks from occurring.

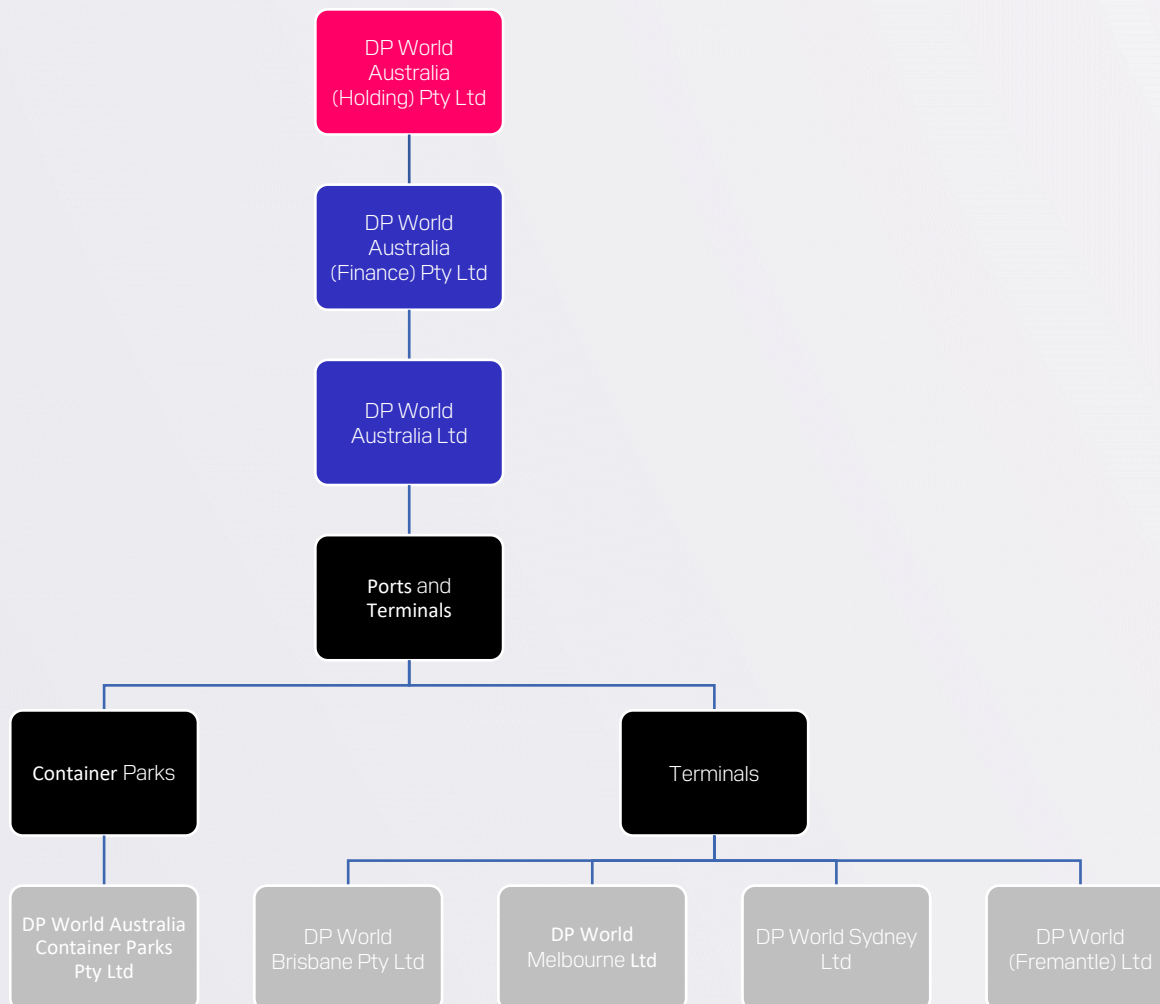
In Australia, the DPWA Group employs around 2000 employees. DPWA also has non-controlled joint venture investments in AWH Pty Ltd (ACN 069 066 842), an agricultural warehousing and logistics business, and in 1-Stop Connections Pty Ltd (ACN 102 573 544) an innovative supply chain technology solution business. This statement does not cover these non- controlled joint ventures.

This statement covers the reporting period of 1 January 2023 to 31 December 2023 and is the fourth joint statement made by the DPWA Group. The mandatory criteria as outlined in section 16 of the Act has been addressed in this statement as per below:

MANDATORY CRITERIA FOR MODERN SLAVERY STATEMENTS		PAGES
1	Identify the reporting entity	3
2	Describe the reporting entity's structure, operations, and supply chains	4
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	6
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	7
5	Describe how the reporting entity assesses the effectiveness of these actions	10
6	Describe the process of consultation with any entities the reporting entity owns or controls	11
7	Any other relevant information	11

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

DPWA is headquartered in Sydney at Level 40, 25 Martin Place Sydney NSW 2000, and has been operating for over 60 years, historically operating as Peninsular & Oriental Steam Navigation Company (P&O) before joining the DP World Limited Group in 2006. Its structure is as per the following organisational chart:



DPWA provides a comprehensive range of services across four maritime container terminals (located in Brisbane, Sydney, Melbourne, and Fremantle) and two container parks (located in Sydney and Melbourne) and can move over 10,000 twenty-foot equivalent units (TEUs) each day. The four terminals each operate under its own entity, while both the container parks operate under DP World Australia Container Parks Pty Ltd.

In Fremantle, the terminal is in the principal port of Western Australia, at the mouth of the Swan River. It has 2 berths, a 646m quay line and 210m share zone, and a terminal area of 17.9ha.

In Melbourne, the terminal is in the Port of Melbourne, Australia's largest maritime hub, and is the largest DP World terminal in Australia. Adjoining the West Swanson intermodal terminal site with direct rail facilities and our Melbourne Container Park, the terminal has 3 berths, 929m quay line, and a terminal area of 39ha. Our Melbourne Container Park has an area of 9.5ha and is the only fully integrated container park in West Swanson, combined with rail connectivity, and allows receipt by road and rail 24/7.

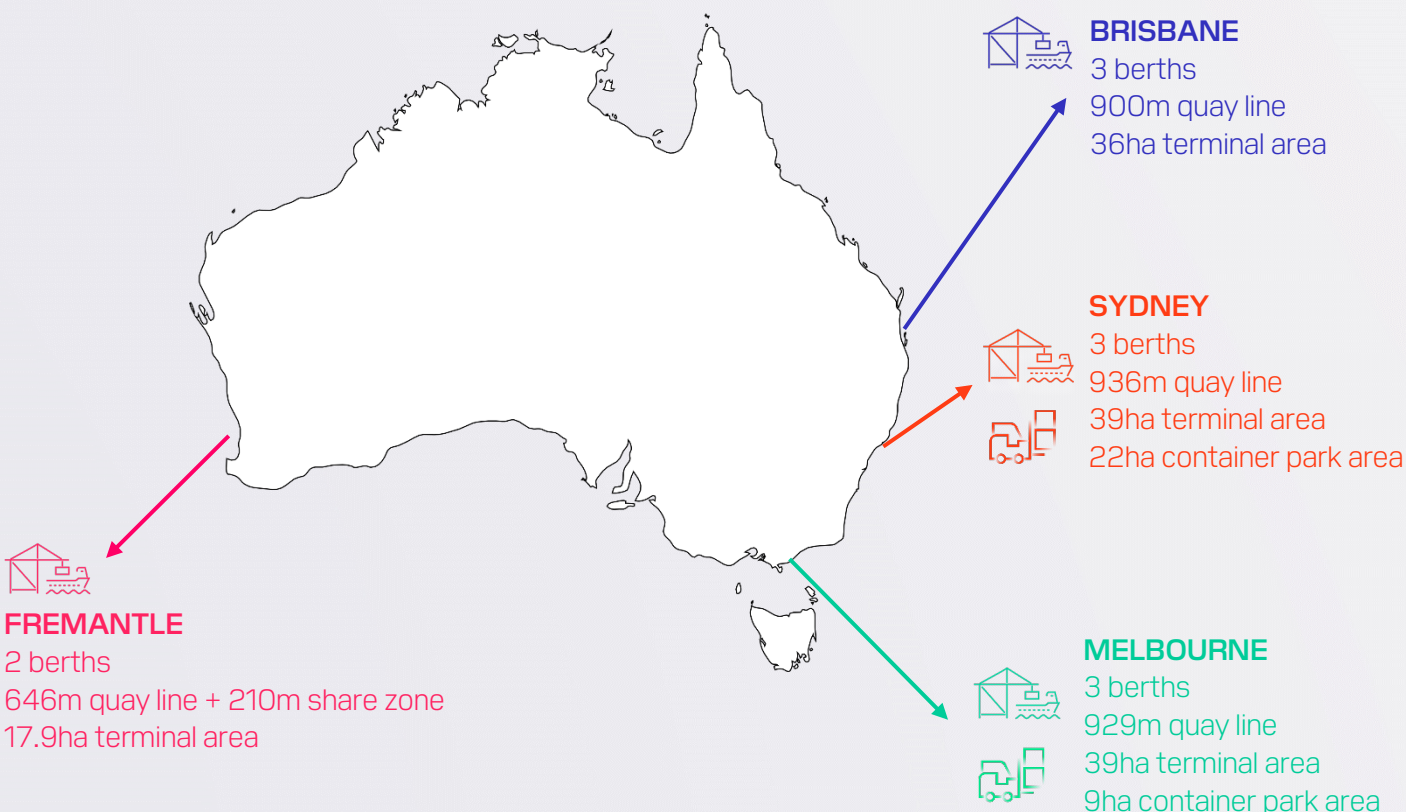
In Sydney, the terminal is in Port Botany, close to Sydney’s city centre and uniquely positioned adjacent to our Sydney Container Park to offer customers end to end supply chain solutions. Offering easy access to motorways and an on dock direct rail link, the terminal has 3 berths, 936m quay line, and a terminal area of 39ha. The adjacent Sydney Container Park consists of 3 park areas totaling 22ha and is open to receipt by road and rail 24/7, enabling convenient return of emptied import containers and collection of empty containers for export by road haulage, and rail transportation with connectivity linking Sydney metro and regional NSW train services.

In Brisbane, the terminal is located on Fisherman Island at the mouth of the Brisbane River and is a semi-automated terminal with 3 berths, 900m quay line, and a terminal area of 36ha. At the end of 2023, DPWA broke ground on a new container park due to open in 2024.

Noting the scale of DPWA’s operations, DPWA strives to identify and address modern slavery risks both within our own operations and within our entire supply chain and expect all parties in our supply chain to share this commitment. Our dedicated procurement team engages mostly with suppliers registered and operating in Australia, however high-cost operating equipment such as quay cranes and movable equipment may be sourced from overseas in accordance with established procurement procedures.

Goods and services may be procured from a range of suppliers across a variety of sectors including engineering, facilities, security, information technology, consulting services and administration supplies. In terms of goods, DPWA procures inter alia terminal equipment and parts, vehicles including prime movers and trailers, and protective personal equipment. In terms of services, these include subcontractor services, security personnel and other labour hire.

Our Locations





3. IDENTIFYING MODERN SLAVERY RISKS

In acting ethically and with integrity, DP World has an internal Human Rights Working Group implementing a human rights framework, within which the identification of modern slavery risk and the eradication thereof are recognised as integral. The Human Rights Working Group has identified the following three areas as comprising the highest risk for DP World's business globally: procurement, third-party contractors, and the use of our ports by others for human trafficking purposes.

At the local DPWA level, the DPWA Audit & Risk Sub Committee of the Board of Directors leads risk assessment and management in general. The formation of a local Modern Slavery Working Group would also enable greater identification of potential modern slavery risks.

DPWA acknowledges that the following activities may encompass modern slavery risks within our operations or supply chain:

- Insufficient data capture of customer or supplier information to enable DPWA to conduct a proper evaluation of such customer or supplier's position in relation to modern slavery.
- Lack of transparency in the supply chains of our partners, customers, suppliers or contractors, or their lack of awareness of regulations relevant to modern slavery.
- Security breaches of DPWA terminals or such other premises, which may give rise to stowaways or the use of DPWA ports and terminals for the purposes of human trafficking.
- Direct or indirect hire of migrant workers, and other labour hire through contractors.

4. DPWA ACTIONS TO ADDRESS MODERN SLAVERY RISKS

The DP World Modern Slavery and Human Trafficking Policy is the key policy that is reviewed annually and reflects our approach to modern slavery and human trafficking risks and clarifies the steps that anyone can take to voice any related concerns. This policy is further affirmed by the annual Modern Slavery and Human Trafficking Statement from DP World's Group Chairman and CEO.

Our due diligence and preventative measures against modern slavery risks include the following:

- ***Modern Slavery Training***
We require all our employees to do induction training and annual refreshers on modern slavery to affirm and remind employees of DP World's stance on modern slavery and human trafficking and increase our employees' attunement to potential risks.
- ***Employee Status and Wellbeing***
DPWA employs approximately 2,000 employees. We follow recruitment and induction policies and procedures which require that we ensure that all employees are eligible to work under Australian law and meet the minimum employment requirements. This includes conducting VEVO checks on direct hired employees with visas. A large proportion of DPWA employees are employed on a fixed-term or casual basis, with most casual employees being covered by Enterprise Agreement terms and conditions. Where an employee is covered under an Enterprise Agreement, we ensure this is in accordance with Fair Work Australia's 'Better Off Overall Test' (BOOT) guide; under which the rates are significantly higher than the comparable Modern Award rates. DPWA occasionally engages the services of recruitment agencies for indirect hiring; however, we only use large reputable recruitment agencies who conduct their own background checks on candidates, including their right to work. Speak Up posters are displayed in multiple areas across all DPWA premises, as well as information on our employee assistance program known as the Coaching, Advice, Reassurance and Encouragement (CARE) Program designed to assist employees in improving their health and well-being and resolving personal or workplace challenges.
- ***Safety – Zero Harm Approach***
DPWA understands that the industry we operate in is a high- risk environment in terms of considerable interaction between people and heavy equipment, loads and falls from heights which expose our people to a range of health and safety hazards. Accordingly, to a safer environment and working conditions for our employees (and anyone who attends our premises), DPWA has a dedicated internal human resources and industrial relations team, as well as specialised teams focusing on work, health, and safety issues such as any injury management and return to work specific for stevedores. In line with our Zero Harm approach to ensure that the environment is protected and that everyone goes home safely, we maintain up to date health and safety environment standards, guidelines, and targeted field- based risk programs, and extensive safety promotion activities. Risks and control procedures are regularly audited internally and externally to ensure the safety of our people.
- ***Security***
To prevent stowaways and security breaches, DPWA seeks to ensure our security personnel are capable of identifying and responding to such risks. Our security personnel are contracted and undertake DPWA induction training in addition to their employer's induction training, which includes an anti- modern slavery component. All DPWA terminals have an approved Maritime Security Plan approved by the Department of Home Affairs and are operated pursuant to Maritime Transport and Offshore Facilities Security Act 2003. Each terminal has a nominated Landside Restricted Zone

(LRZ), access to which is controlled through the terminals access control system and monitored by CCTV systems. All employees, contractors and truck drivers must hold and clearly display a valid Maritime Security Identity Card (MSIC) to gain unescorted access to a terminal's LRZ or must otherwise be escorted at all times.

- *Supplier Screening*

Our dedicated procurement team follow established policies and procedures which keep them attuned to potential risks and guide the screening of suppliers from the beginning of a tender process. This includes a requisite questionnaire requiring the potential vendor to do a modern slavery and human rights self-assessment. If the vendor successfully proceeds to the next round, they must then agree to comply with DPWA standard contractual terms including to supply goods and/or services in accordance with applicable laws, and in compliance with our specific anti-modern slavery clauses and audit rights/ breach notification obligations. Potential suppliers must also agree to comply with DPWA policies (made available in the externally facing contractor management system), which include the DP World Modern Slavery and Human Rights Policy and Code of Conduct.

- *Customer and Partner Relations*

In our relations with other (non-supplier) parties such as customers, we strive to reflect our position on modern slavery risks in such agreements. For example, DPWA customers include shipping lines (container carriers), road and rail operators, and shippers, who are primarily engaged through one of the following agreement formats: terminal services agreement; carrier access agreement; rail access agreement; or container park agreement. All these template customer agreements contain an anti-modern slavery clause and require audit rights and obligations upon the customer to notify us of any breach of these provisions.

Our remediation measures in light of any modern slavery risks and concerns include the following:

- *Supplier Management*

From the beginning of a tender process, if a vendor does not satisfy our criteria in relation to modern slavery alignment, they are provided an opportunity to remedy or are otherwise removed from the tender process. As successful vendors must agree to comply with, inter alia, DPWA policies and also have a direct contractual obligation requiring anti-modern slavery compliance, DPWA has contractual avenues to remedy in the event of non-compliance by a supplier.

- *Whistleblowing Hotline*

At all times, any individual – employees, suppliers, customers, other third parties, etc. – can access our confidential, externally administered, whistleblowing hotline to report any concerns or suspected violations of human rights. Individuals making a report may remain anonymous and are protected from retaliation in any form. To access the Whistleblower Hotline, individuals can call 1800 953 936 toll free or visit the direct link at www.dpworld.ethicspoint.com. Our Whistleblowing Policy can be read online at <https://www.dpworld.com/australia/about-us/governance/policies>.

Further actions were taken in 2023 to supplement DPWA's abovementioned measures, which include the following:

- Work aimed towards improved security – security signage updates pursuant to the Maritime Transport and Offshore Facilities Security Act 2003, and collaboration with government authorities for the instalment of CCTV at our Sydney terminal.
- Discussions with our security supplier regarding their own anti-modern slavery training content and policies.
- Engagement in wider industry forums and events, including attendance at a seafarers' support luncheon.
- Continuous work on development of our DPWA Modern Slavery Working Group, including development of working guidelines.
- Collaboration with DP World Group Internal Audit team to review and validate our weblinks to our whistleblowing policy and hotline, as well as review and validation of posters around DPWA premises to ensure each location had one with the whistleblowing policy and hotline information.

Moving forward, DPWA intends to work on the following to further supplement our efforts in preventing and mitigating any risks of modern slavery:

- Further development of DPWA Modern Slavery Working Group
- Further collaborations with DP World's internal Human Rights Working Group and connect with other DP World teams globally who work on modern slavery statements and initiatives in their own jurisdiction.
- More engagement in wider industry forums to learn and discuss best practices in terms of preventative measures.



5. ASSESSING EFFECTIVENESS

DPWA regularly conducts risk assessments of its operations through its senior management meetings and quarterly Audit & Risk Sub Committee of the Board of Directors. The establishment of DPWA's Anti- Modern Slavery Working Group will supplement this by providing a specific forum to assess of the effectiveness of our actions in relation to the risk of modern slavery.

In reviewing the effectiveness of our measures to prevent risks of modern slavery, DPWA relies on the following indicators:

- *Modern Slavery Awareness – Policies and Training*
The DP World Limited Group conducts annual review of our global Modern Slavery and Human-Trafficking Policy to ensure it is always reflective of DP World's position. The completion rate of employees' anti- modern slavery training during their employment induction and annually thereafter are targeted to be 100%.
- *Contractual Obligations and Relations with Others*
All contract templates produced by DPWA must have anti- modern slavery clauses. DPWA acknowledges that not all our contracting is done using our contract templates – in those instances we review to confirm the inclusion of anti- modern slavery and/or human rights clauses. Importantly, we consider our suppliers' and partners' position on modern slavery and evaluate their alignment with us including, for example, their anti- modern slavery framework (if any) and willingness to discuss modern slavery issues or collaborate on initiatives.
- *Whistleblowing Hotline*
The number of Whistleblowing Hotline reporting related to modern slavery concerns, etc. is also a strong indicator of our anti- modern slavery position. DPWA encourages reporting of all modern slavery concerns and will continue to promote the existence of the Hotline and encourage reporting of any concerns.
- *Employee Wellbeing and Job Satisfaction*
DPWA assesses employee wellbeing regularly, for example through employee evaluation surveys and levels of employee utilisation of DPWA employee benefits and assistance such as the CARE program.
- *Wider Industry Engagement*
Comparison of best practices as discussed through engagement in industry forums, against our own policies and procedures in relation to modern slavery.

6. ANY OTHER RELEVANT INFORMATION

We are proud to confirm that DPWA is experiencing growth, with a new entity DP World Australia Landside Pty Ltd newly incorporated in 2024 to support our growing landside business activities, and an additional container park set to open in Brisbane. As we continue to expand, we are continuously mindful of the evolving risk profile in relation to modern slavery risks and are working towards developing our Anti- Modern Slavery Working Group to better inform our capacity to address any such modern slavery risk.



7. CONSULTATION AND APPROVALS

Operating as an integrated group, our policies including our modern slavery and human trafficking policy are consistent across all entities in the DP World group structure. 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 prepared following cross-functional collaboration between, inter alia, our legal, procurement, and operations teams; and has been approved by DP World Australia (Holding) Pty Ltd's Board of Directors.



GLEN HILTON

DP WORLD AUSTRALIA (HOLDING) PTY LTD
CHAIRMAN, BOARD OF DIRECTORS



DP WORLD