



DP WORLD

MODERN SLAVERY

Transparency Statement
DP World Europe
Reporting period: 1 January – 31 December 2025

01

EXECUTIVE SUMMARY

4

02

STRUCTURE

7

2.1 OUR EUROPEAN BUSINESS AND ORGANISATIONAL STRUCTURE

8

2.2 DP WORLD SUSTAINABILITY STRATEGY

15

03

OUR EUROPEAN MODERN SLAVERY GOVERNANCE FRAMEWORK

16

3.1 ROLES AND RESPONSIBILITIES

17

3.2 POLICIES, PROCESSES AND FRAMEWORKS

18

04

RISK ASSESSMENT

19

4.1 OUR EUROPEAN WORKFORCE

20

4.2 DP WORLD GROUP ASSESSMENTS

23

4.3 EUROPEAN SALIENT RISKS: METHODOLOGY AND FINDINGS

24

4.4 SUPPLY CHAIN RISK ASSESSMENT

25

05

DUE DILIGENCE

26

5.1 APPROACH TO RESPONSIBLE PROCUREMENT

27

5.2 SUPPLIER ENGAGEMENT PROGRAMME

29

5.3 TEMPORARY WORKERS

30

5.4 INTERNAL AUDITS

30

5.5 APPROACH TO RESPONSIBLE BUSINESS RELATIONSHIPS

30

06

GRIEVANCE, ESCALATION & REMEDIATION

31

07

TRAINING & AWARENESS

35

08

FUTURE OBJECTIVES

41

09

PERFORMANCE METRICS

43

10

APPENDICES

46

A SUBSIDIARIES COVERED

47

B TISC REPORTING – AREA MAPPING TABLE

48

C KEY POLICIES CONCERNING MODERN SLAVERY
AND HUMAN TRAFFICKING

49

D DATA INPUTS AND COUNTRY RISK WEIGHTING SERVICES

52

E REPORTING PATHWAY TABLE

53

F TISC LEVEL 1 & 2 GAP CHECKLIST

54

This statement is made pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015, and sets out the steps taken to prevent Modern Slavery and Human Trafficking (MSHT) in the business and supply chain described below for the year ending 31 December 2025. It also includes details of plans for the current year.

This statement covers the DP World Europe region only, encompassing the entities listed in Appendix A, which undertake Ports & Terminals, Contract Logistics and Freight Forwarding/Freight Management activities ("DP World Europe")¹. DP World Europe is part of the DP World group of companies, which is headquartered in Dubai ("DP World Group").

This statement is made by The Peninsular and Oriental Steam Navigation Company, which acts as DP World Europe's head office and is the holding company of many of the listed entities. This statement has been signed by a director of The Peninsular and Oriental Steam Navigation Company.

The following entities are not included in this statement for the year 2025: the Herport group of companies, DP World Freight Forwarding UK Limited (formerly Edge Worldwide Logistics Limited) and the Legend group of companies. These entities were only recently integrated into DP World Europe and will be included in our statement for 2026 – please see the relevant company websites for their 2025 statement.

DP World Group aims to ensure secure and resilient societies and communities wherever we operate. Our data-driven logistics transform business and help us lead the future of global trade, enabling the most productive, efficient, sustainable and safe trade solutions globally. This is as important commercially as it is to the societies where we live and work. As a global employer, DP World Group strives to improve people's lives, strengthen communities and protect the environment. We do not tolerate slavery, servitude, forced labour or human trafficking anywhere in our operations or supply chain.

Information for this statement was gathered from internal policies and systems, and from engagement with external experts. Data has been subject to DP World Group internal review and verification processes.

This statement includes information about the ways people can be exploited. It covers topics such as unfair labour practices, forced work, abuse or other forms of exploitation.

We recognise that reading about these issues may be difficult for some people due to their own experiences of this kind of treatment or those they know and may bring up questions and concerns. Support is available and you can raise concerns safely and confidentially by using any of the methods below. You do not need to have proof to raise a concern and reports can relate to current, past or suspected situations. We encourage you to contact any of our dedicated reporting pathways.



Phone:
United Kingdom –
0800 048 8435

(for different country numbers
please visit the website)



Online:
Whistleblowing
Hotline | Report
Ethical Concerns |
DP World



Independent support is also available via the United Kingdom Modern Slavery & Exploitation Helpline. The helpline is free, safe and confidential. It is available to all workers, community members and anyone with a concern, and can be used anonymously if preferred.

08000 121 700,
or report online

¹The following DP World Group businesses are not part of DP World Europe: Marine Services businesses including Multimodal Solutions (formerly P&O Ferrymasters), Shipping Solutions (formerly Unifeeder) and P&O Ferries. For statements on behalf of those companies, please see the relevant company website.



01 EXECUTIVE SUMMARY

01 EXECUTIVE SUMMARY

We are committed to preventing MSHT across our operations and value chain. As many of the industries we serve are inherently high risk, we have a duty to manage and mitigate potential human rights risks.

Our approach:

- Aligns with international standards (including the UN Guiding Principles on Business and Human Rights (UNGPs), Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct, the International Labour Organisation (ILO) Core Labour Standards, the United Kingdom Government Transparency In Supply Chains (TISC) Guidance and the CCLA Benchmark).
- Is informed by risk assessments and stakeholder engagement.
- Is focused on continuous improvement across policy, due diligence, grievance and remediation.



Key activities in 2025

This table summarises progress against our multi-year roadmap and highlights key actions taken during the reporting period.

 Governance & resourcing	- Established a cross functional UK team to focus on MSHT including members from UK Operations teams, Europe Procurement, UK Facilities teams, UK Commercial Teams, European Security, UK People (HR) and Europe Sustainability. - Reported to the European Boards on progress of the human rights and modern slavery programme.	 Due diligence	- Launched a sustainable supplier European engagement programme; 349 suppliers targeted in 2025, 84 fully onboarded across direct, indirect and logistics categories. - Third party audit reports disclosed via the external platform identified 3 critical/54 major issues; 100% remediated/closed via corrective actions. The main themes included right-to-work, freedom of association, working hours and safe/hygienic conditions. - Shifted prioritisation from spend-led to risk-led, aligning with our European salient risk assessment.
 Strategy & programmes	- Continued implementation of the European human rights and modern slavery programme. - Mapped and evaluated existing governance frameworks to identify coverage gaps concerning risks associated with MSHT.	 Stakeholder collaboration	- DP World Europe engaged an external anti-slavery Civil Society Organisation, aimed at addressing modern slavery within our value chain. - Actively collaborated and engaged with the Civil Society Organisation and Design for Freedom in the United Kingdom to address and advance efforts against modern slavery. Design for Freedom is an initiative created and led by Grace Farms Foundation (a registered charity), focused on eliminating forced labour from the building materials supply chain.
 Risk assessment	- Completion of a desk-based salient risk assessment for DP World Europe. Identified potential higher-risk countries and vulnerable groups; integrated outputs into procurement priorities; aligned with UNGPs and OECD Guidelines, covering our Ports & Terminals, Logistics, and Economic Zones business pillars. The scope included third-party labour in warehousing, transport and subcontracted operations. Marine Services, suppliers and non-European supplier countries were out of scope for this reporting year due to the organisational structure and maturity of our systems. See section 4.3 for more details. - DP World Group conducted the DP World Risk and Internal Controls Standards (RICS) assessment to assess control implementation and effectiveness and updated departmental risk registers.	 Training & awareness	- In 2025, 4,366 employees were trained across Europe via 9 different sessions including online, e-learning and in person. - Became a member of the UN Global Compact (UNGC) United Kingdom network in December 2025.

02 STRUCTURE

2.1 OUR EUROPEAN BUSINESS AND ORGANISATIONAL STRUCTURE 8

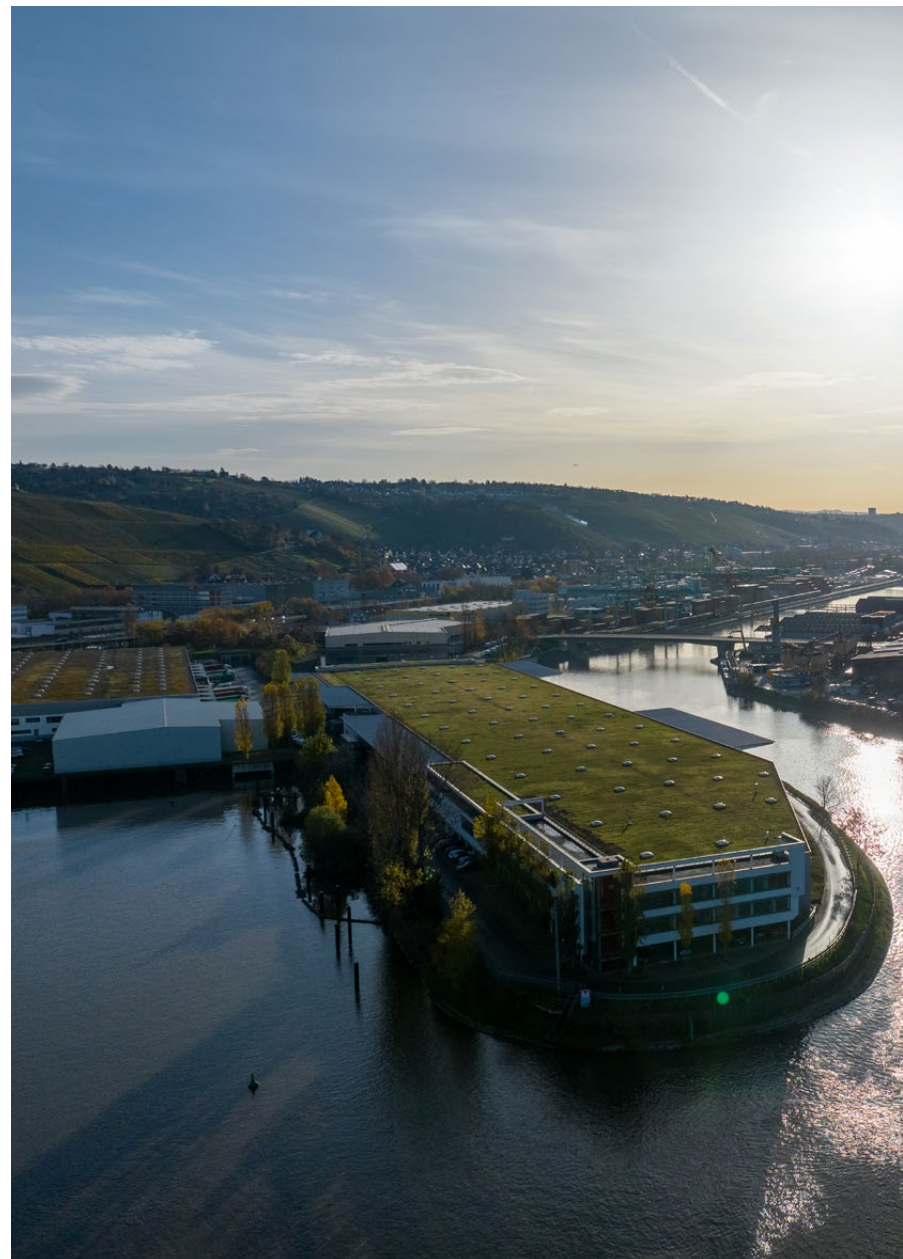
2.2 DP WORLD SUSTAINABILITY STRATEGY 15

02 STRUCTURE

2.1 Our European business and organisational structure

DP World Europe is part of DP World Group. In Europe, we are rapidly transforming to become a leading integrated supply chain provider.

Through our far-reaching integrated European network of deep sea and inland terminals, warehousing and transport solutions, DP World Group helps trade flow across Europe and the rest of the world. We serve a variety of industries, including the technology sector, chemicals, automotive, industrial manufacturing, healthcare, energy, agriculture, retail, and food and beverages, providing customers with the efficient, streamlined, sustainable and resilient supply chain solutions they need to overcome challenges and build trade relations across the world.

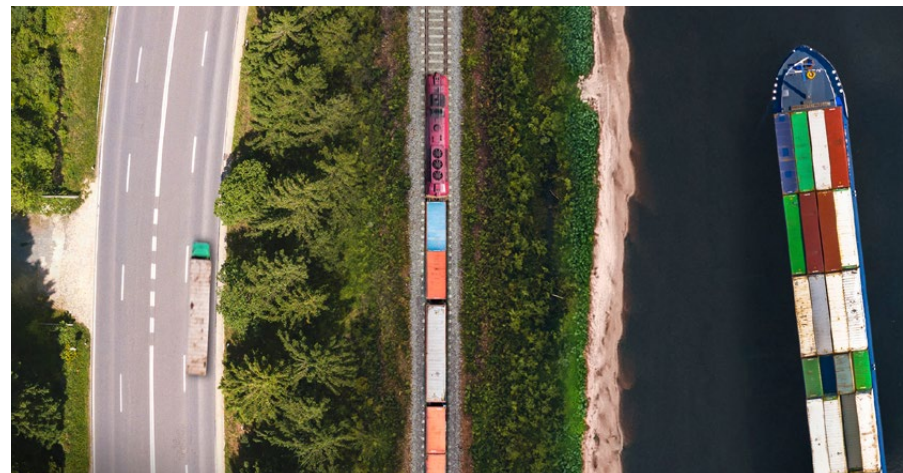


Our purpose

We change what's possible.

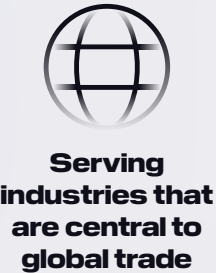
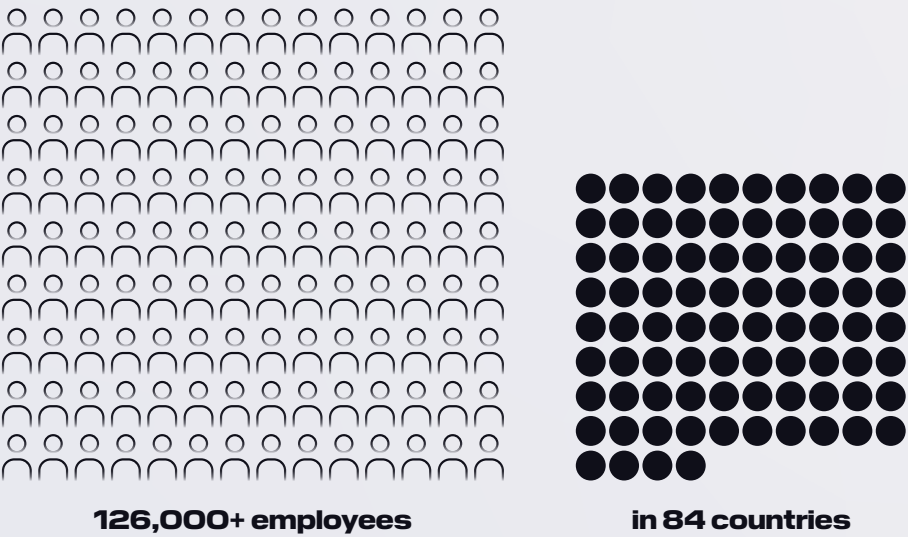
We achieve this by designing smarter, faster and bespoke supply chain solutions.

This is our north star. It guides every decision we make and allows us to make a meaningful difference to the world. Whatever we do, wherever we do it, it all leads here.



Our scale

DP World Group:



DP World Europe:



²See section 4.4 for a breakdown of supplier categories

Our footprint in Europe

Our DP World Europe locations are shown in our Product Services [Map](#).

Our interactive Product Services Map provides an online tool to deep dive into different parts of our portfolio. The map enables users to identify our products and services by country, region or DP World Pillar, also identifying DP World Group locations worldwide.

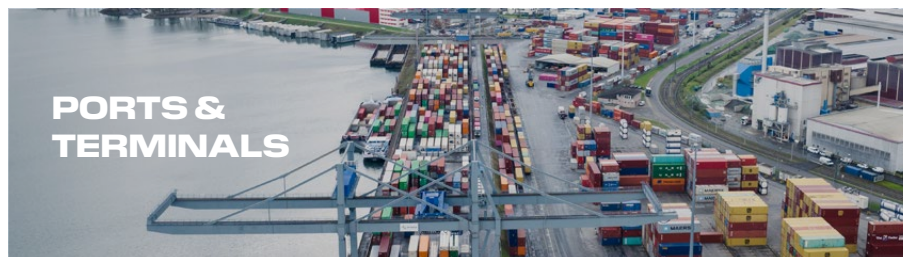
These are the countries where we have no physical presence but we operate through trusted agents:

- Albania
- Bosnia and Herzegovina
- Croatia
- Kosovo
- North Macedonia

From January 2026 we no longer have a presence in Ukraine.



DP World Europe operates through integrated business divisions designed to support end-to-end global trade and supply chains.



Ports & Terminals

Our Ports & Terminals form the core of our business, operating and developing a global network of container and non-container terminals that expedite the efficient movement of goods and focus on origin- and destination-based cargo flows. This division provides services including container handling, roll-on/roll-off, breakbulk and project cargo handling, port infrastructure development, automation and digital terminal operating systems with integrated road and rail connectivity. To find out more, see our DP World Product Services [Map](#).

10 Deep sea Terminals (8 countries)

These are joint ventures:

- **Belgium:** Antwerp Gateway (60%)
- **Türkiye:** DP World Evyap Yarimca / Korfez (58%)
- **Cyprus:** Limassol (75%)
- **France:** Eurofos (50%)
- **Ukraine:** Pivdennyi (51%)³
- **Netherlands:** Rotterdam World Gateway (30%)

15 Inland Terminals (6 countries)



4,000+
employees



24 locations
in 11 countries

³Sold in early 2026

Logistics

DP World Group's Logistics division is focused on delivering end-to-end supply chain solutions that connect cargo owners from factory floor to final destination. The scope of this division includes multimodal transport, warehousing and contract logistics, freight forwarding, inland terminals, logistics parks and economic zones, customs brokerage, market access and trade finance, as well as sector-specific solutions across industries such as automotive, retail, healthcare, technology, chemicals, industrial and consumer goods. This division has a significant footprint in Europe, including 15 trimodal inland terminals across Belgium, France, Germany, Romania, Serbia and Switzerland, and major warehousing and contract logistics assets. Find out more, see our DP World Product Services [Map](#).



**18,000+⁴
employees**



**372+ locations
in 32+ European
countries**

Freight Europe: flexible transport Europe

Our multimodal network of land, air and sea transport routes within Europe specialises in automotive, technology, chemicals, retail and consumer, engineering and manufacturing, healthcare and perishables offering flexible, sustainable solutions to the supply challenges of getting goods into local communities. We act as the single point of contact for our customers with international freight, solving the complex challenges of end-to-end logistics at scale. We also offer road freight services within Multimodal Solutions, a 100% owned DP World entity⁵.



**2,500+⁶
employees**



**70+ freight
forwarding offices
in 20 European
countries**

⁴This employee count includes Freight Europe and Contract Logistics (see next page)

⁵This entity does not form part of DP World Europe for the purposes of this statement

⁶This employee count is included within the overall Logistics employee total

Contract logistics: seamless connectivity

We are reimagining contract logistics by replacing supply chain complexity with seamless connectivity, making trade simpler for everyone – from the world's key industry players to aspiring small businesses.

These value-add solutions include:

- Manufacturing and assembly
- Export packaging
- Fulfilment and value-add, reverse
- Repair and service parts



14,000+⁷ employees in Europe



135 facilities in 15 countries, 1 is a joint venture, located in Italy



2.64km² warehouse space in Europe – equivalent to 370 football fields

⁷This employee count is included within the overall Logistics employee total

Economic zones: connecting trade and industry

We are developing a network of economic zones across Europe designed to simplify trade, attract investment and support long term economic growth. These strategically located zones combine modern logistics and industrial infrastructure with scalable development capacity, enabling businesses to locate closer to markets, optimise supply chains and grow with confidence. Our economic zones are centred on connectivity, flexibility and operational efficiency, supporting a wide range of logistics and value adding activities. Find out more, see our DP World Product Services [Map](#).



100+⁸ employees



19 operational facilities



0.32km² of built and operational warehouse space – equivalent to 45 football fields



0.69km² total planned capacity identified within the business plan, including future development plots

⁸Excluding contractors and third party operators

Technology: revolutionising global trade



Digital solutions underpins all DP World Group business divisions and are designed to reduce inefficiencies and increase transparency across global trade and supply chains. The purpose of this division is to digitise trade processes and enable faster, more secure, and more resilient supply chains through technology-driven platforms. Its key products and services include the CARGOES digital suite, which covers customs and border processing systems, cargo visibility and tracking, digital freight forwarding tools, digital pricing, trade finance and insurance solutions, and data- and AI-enabled planning and optimisation tools. These digital solutions are deployed across DP World Group's global operations and customer base, including across Europe, supporting ports, terminals, logistics parks and freight forwarding networks.

2.2 DP World sustainability strategy

DP World Group’s ‘Our World Our Future’ sustainability initiative was refreshed in 2025.

This updated strategy is designed to propel the business forward and meet the expectations of customers and external stakeholders, regulatory developments and investor demands. At its heart are the four strategic pillars that align operations with the most pressing sustainability priorities of our time:

Focus topics		
	Planet Addressing climate change, biodiversity, water stewardship and pollution	Climate change, nature and biodiversity, water, waste and pollution
	People Prioritising health and safety, employee wellbeing and fair working conditions	Health and safety, employee growth and belonging, fair working practices
	Community Supporting community resilience and advancing social impact	Affected communities, corporate social responsibility
	Conduct Upholding the highest standards of business ethics and integrity	Business ethics

Supporting these pillars are two critical enablers that help us deliver lasting results:

	Governance and Risk Management Frameworks, with clear board and committee oversight help DP World Group minimise modern slavery risks. Risk assessments are embedded in policies and processes ensuring targeted training and awareness, accountability and alignment.
	Innovation and Opportunities Using digitalisation, data-driven logistics and technology-enabled due diligence to increase transparency and traceability across operations and supply chains, making it easier to identify and address modern slavery risks. New human rights programmes, Civil Society Organisation partnerships and continuous-improvement initiatives allow DP World Group to test and adopt more effective tools, collaborations and approaches, turning modern slavery risk management into an ongoing opportunity to strengthen ethical, resilient and sustainable trade.

To find out more on the updated strategy see the [DP World 2025 Sustainability Report](#)

03

OUR EUROPEAN MODERN SLAVERY GOVERNANCE FRAMEWORK

3.1 ROLES AND RESPONSIBILITIES

17

3.2 POLICIES, PROCESSES AND FRAMEWORKS

18

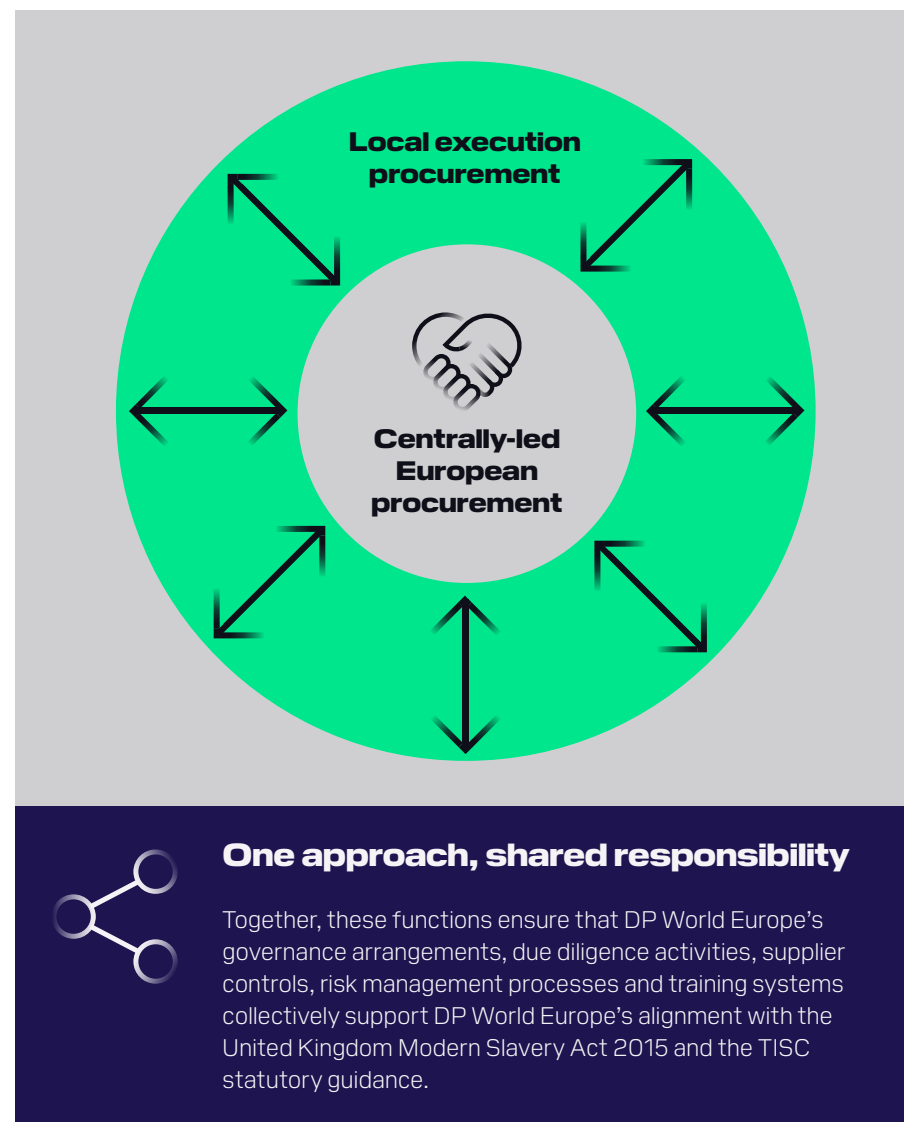
03 OUR EUROPEAN MODERN SLAVERY GOVERNANCE FRAMEWORK

Good governance is core to our business achieving its objectives and vision to lead the future of world trade. In 2026, we will be defining roles, escalation pathways and accountability for modern slavery across Europe. The European Sustainability team will integrate across multiple departments for coordinated risk management.

3.1 Roles and responsibilities

Multiple functions support modern-slavery governance across DP World Europe. The table in Appendix B outlines their responsibilities across TISC reporting areas.

- The DP World Human Rights Working Group comprises senior members from the Group Company Secretariat, Group Sustainability & Impact, Group Health, Safety & Environment, Group Procurement, Group Enterprise Risk and Resilience, Group People and Group Security departments. The group convenes as needed. Any matters raised during these meetings, typically relating to identified gaps or assessments conducted within the group, are communicated to the relevant department/stakeholder for appropriate action. The group oversees the development and application of DP World Group's human rights framework.
- Under the DP World Group Human Rights Policy, Group Sustainability support risk identification and participate in the Human Rights Working Group. They also support awareness raising and training on human rights across the business.
- DP World Europe Boards receive modern slavery programme progress updates. These are received at least once a year.
- The Vice President for Sustainability Europe is responsible for the regional oversight.
- Our DP World Europe Procurement team is centrally led with local implementation.



3.2 Policies, processes and frameworks

DP World Europe's active combatting of MSHT in our business and supply chains is underpinned by appropriate DP World Group, regional and business unit policies, standards and procedures. These address issues relevant to MSHT and are regularly reviewed and updated to reflect our evolving business. Our policies are reviewed on an annual basis by the team with the responsibility for their ownership and oversight.

DP World Group's policies, standards and procedures set out employees' obligations and the process to report suspected and known incidents of MSHT, and consequences for failure to report. They align with the guidelines and international frameworks, such as the UNGPs, the UN Sustainable Development Goals (SDGs) and OECD Guidelines. Our policies are communicated to employees during their induction and are available via our intranet to access at any time. Any updates are emailed out to staff.

The relevant DP World Group and regional and business unit policies that support our European Modern Slavery Statement, including the Code of Conduct, Whistleblowing Policy, Recruitment Policy, Health and Safety Policy, and Vendor Code of Conduct at present, do not explicitly track or evidence changes made over the past year in relation to modern slavery risks. However, policies are usually subject to an annual review cycle.

For a full breakdown of our policies concerning modern slavery and human trafficking please see Appendix C.



04 RISK ASSESSMENT

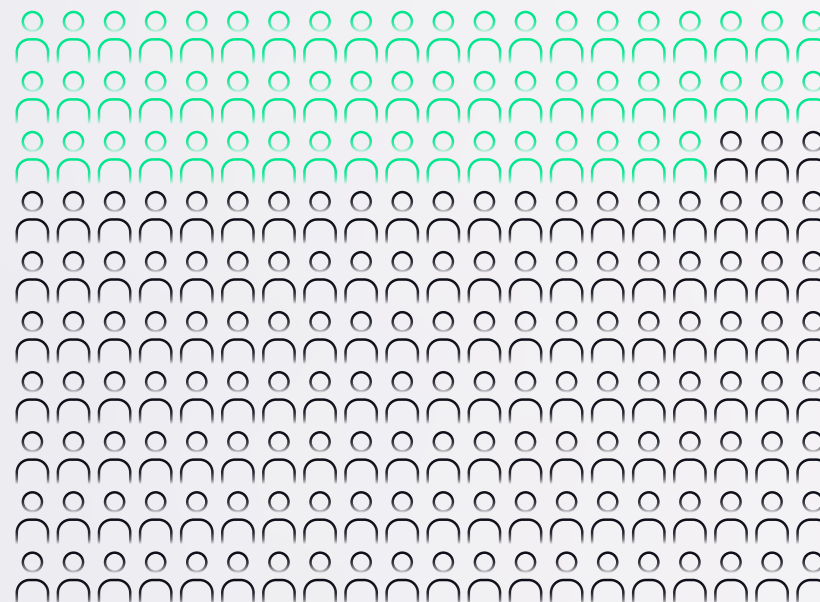
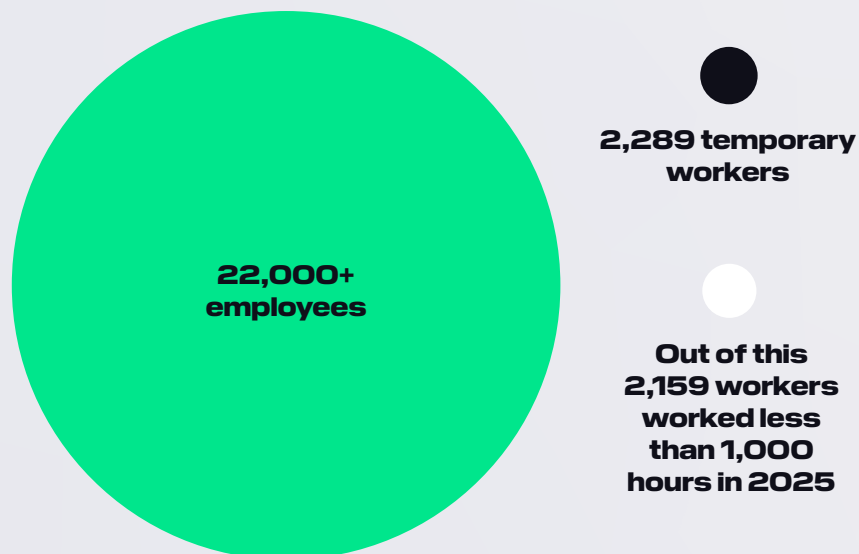
4.1 OUR EUROPEAN WORKFORCE	20
4.2 DP WORLD GROUP ASSESSMENTS	23
4.3 EUROPEAN SALIENT RISKS: METHODOLOGY AND FINDINGS	24
4.4 SUPPLY CHAIN RISK ASSESSMENT	25

04 RISK ASSESSMENT

DP World Europe, while reinforcing expectations through codes of conduct, is currently reviewing all human rights due diligence (HRDD) processes such as prevention and mitigation, supplier and worker engagement. This work is at an early stage, and existing systems and processes are still being developed and strengthened to improve our ability to identify, assess, manage, and monitor risks of MSHT across our operations and supply chain.

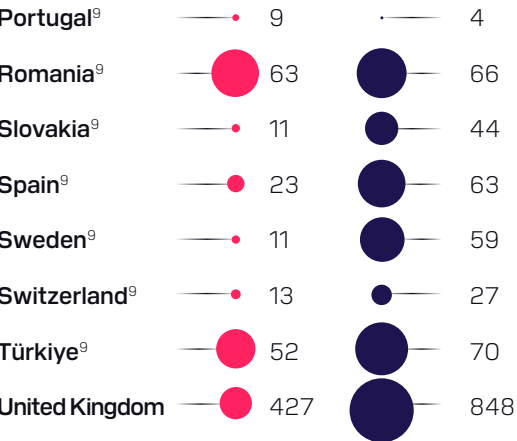
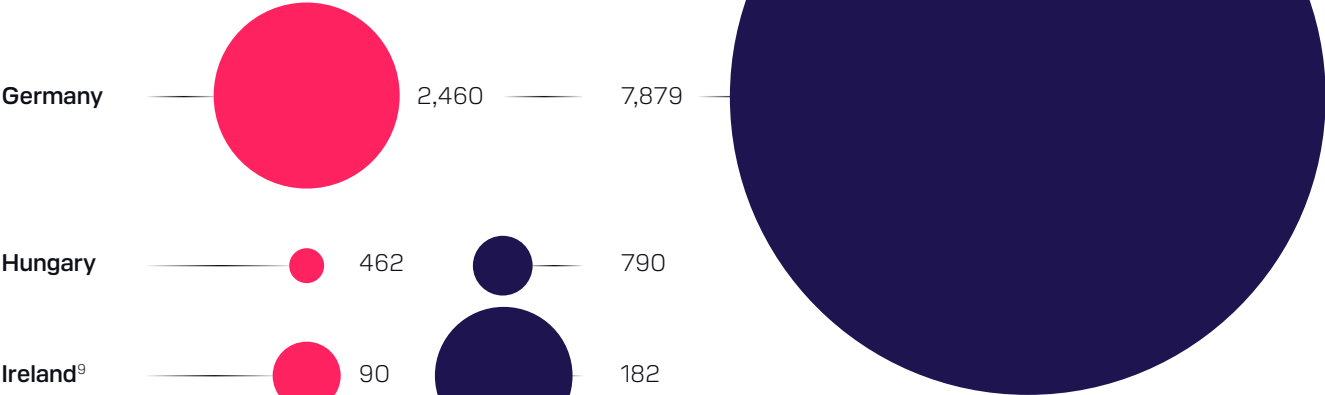
Transportation & Logistics (T&L) are essential to the modern economy. They use lots of subcontractors, have a high reliance on temporary/agency staff, and potentially a high proportion of migrant workers. These are all areas that are at increased risk of modern slavery. Furthermore, given the size of the business and the number of subcontractors, DP World Europe has a complex supply chain, leading to decreased visibility. We operate on an international scale with operations in 32+ European countries, with suppliers and clients spanning across the globe. This increases the difficulty in monitoring and auditing suppliers as well as keeping on top of varying legislative and compliance-based pressures.

4.1 Our European workforce

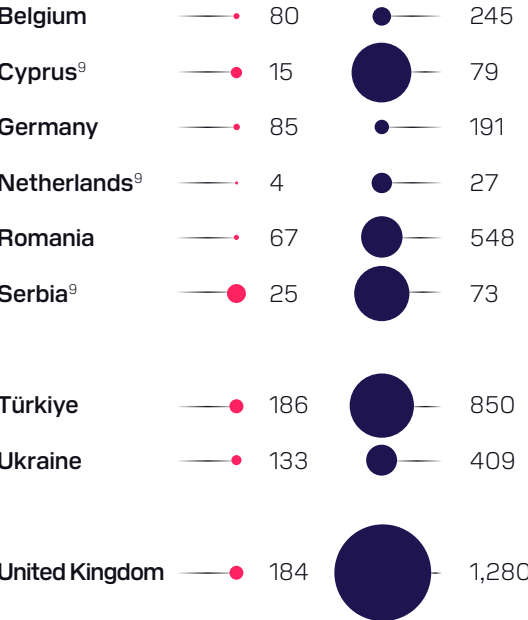


Gender division for DP World Europe employees

Logistics and supply chain



Ports & Terminals

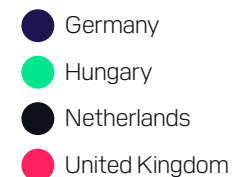


Technology



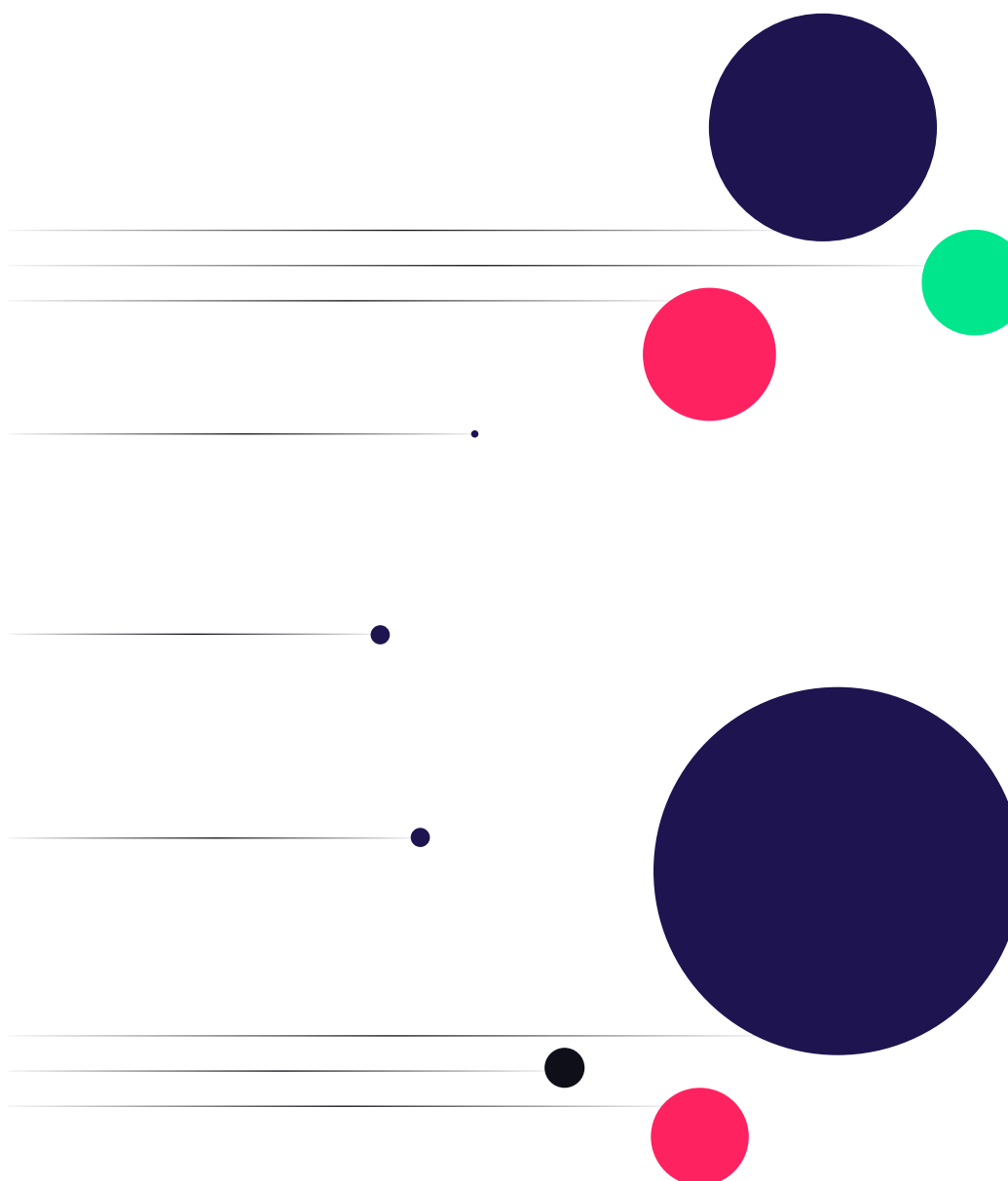
These dots represent the proportional gender breakdown of employees across DP World Europe by country.

⁹Scale has been multiplied by a factor of 10 to make circles visible



Number of temporary workers per sector/country

 Automotive	Grand total 2,289	
	Germany	524
	Hungary	243
	United Kingdom	306
	Automotive total	1,073
 Chemical	Germany	1
	Chemical total	1
 Industrial	Germany	26
	Industrial total	26
 Road Freight	Germany	26
	Road freight total	26
 Technology	Germany	92
	Netherlands	846
	United Kingdom	225
	Technology total	1,163



These dots proportionally represent the number of temporary workers across DP World Europe by sector/country.

4.2 DP World Group assessments

DP World Group Double Materiality Assessment

DP World Group undertook a Double Materiality Assessment (DMA), a requirement under the EU Corporate Sustainability Reporting Directive (CSRD), in 2025 to identify sustainability-related impacts, risks and opportunities across its worldwide operations and value chain.

As part of this assessment, human rights topics affecting workers and communities were identified as material, reflecting DP World Europe's exposure to, and potential linkage with, labour and human rights risks in its value chain.

The DMA identified Own Workforce as a material topic and the key impact and risk areas for them include:

	Fair wages and compliance with labour laws
	Employee health, safety and wellbeing
	Work-related injuries leading to physical and emotional harm

These impacts are associated with short- to medium-term risks (0-5 year time horizon), including legal, regulatory, operational and reputational consequences, as well as potential financial impacts.

The full report can be found here: [Double Materiality Report](#)

DP World Group RICS Assessment

As part of the annual policy and controls compliance activities, business units conduct a self-assessment of the adequacy of their internal control environment against a set of policies, standards and controls. This includes, among other categories, controls related to human rights and modern slavery.

The self-assessment results are presented to, and signed off by, business and regional leadership. The results of the control and policy assessment are presented annually to the DP World Audit and Risk Committee.



4.3 European salient risks: methodology and findings

The 2025 DP World Europe preliminary Human Rights Salient Risk Assessment identified potential human rights risks relevant to T&L, including forced labour and MSHT among others.

These were identified from the BSR 2024 [report](#) (highlighting the 10 most relevant, urgent and potential human rights impacts anticipated in relation to T&L operations), along with key human rights risks identified by the anti-slavery Civil Society Organisation we are working with, the DP World Group DMA, security intelligence and our DP World Europe Task Force on Climate-related Financial Disclosures (TCFD) and Taskforce on Nature-related Financial Disclosures (TNFD) insights.

All data inputs and country risk weightings were drawn exclusively from publicly available, internationally recognised human rights and governance indices. The sources can be found in Appendix D.

The assessment followed a structured, UNGPs-aligned process that included engaging both internal and limited external stakeholders. Stakeholder engagement in 2025 included:

Internal stakeholders

	Departmental representatives from Environment, Sustainability, Communications, Compliance, Security, Legal, People (HR), Internal Audit and Procurement
	European Sustainability Champions from business units across our European operations
	European Community Investment Manager
	Regional Sustainability team

External stakeholders

	Civil Society Organisation, subject matter experts in modern slavery
	Sector insights from BSR (2024) report
	Insights from the DP World Europe TCFD and TNFD assessments for climate, nature and security intelligence

Preliminary results and next steps

The preliminary assessment identified several groups which are most likely to be exposed to modern slavery risks across our European operations, value chain relationships and indirectly linked activities. Other aspects which could occur and increase vulnerability to exploitation, included migrant worker exploitation, precarious and informal employment and discrimination and inequality in the workplace. Some of our Eastern European countries emerged as locations where modern slavery risks are potentially the most salient. To further the assessment please see section 8 for planned actions in 2026.

4.4 Supply chain risk assessment

Our procurement coverage extends across DP World Europe.

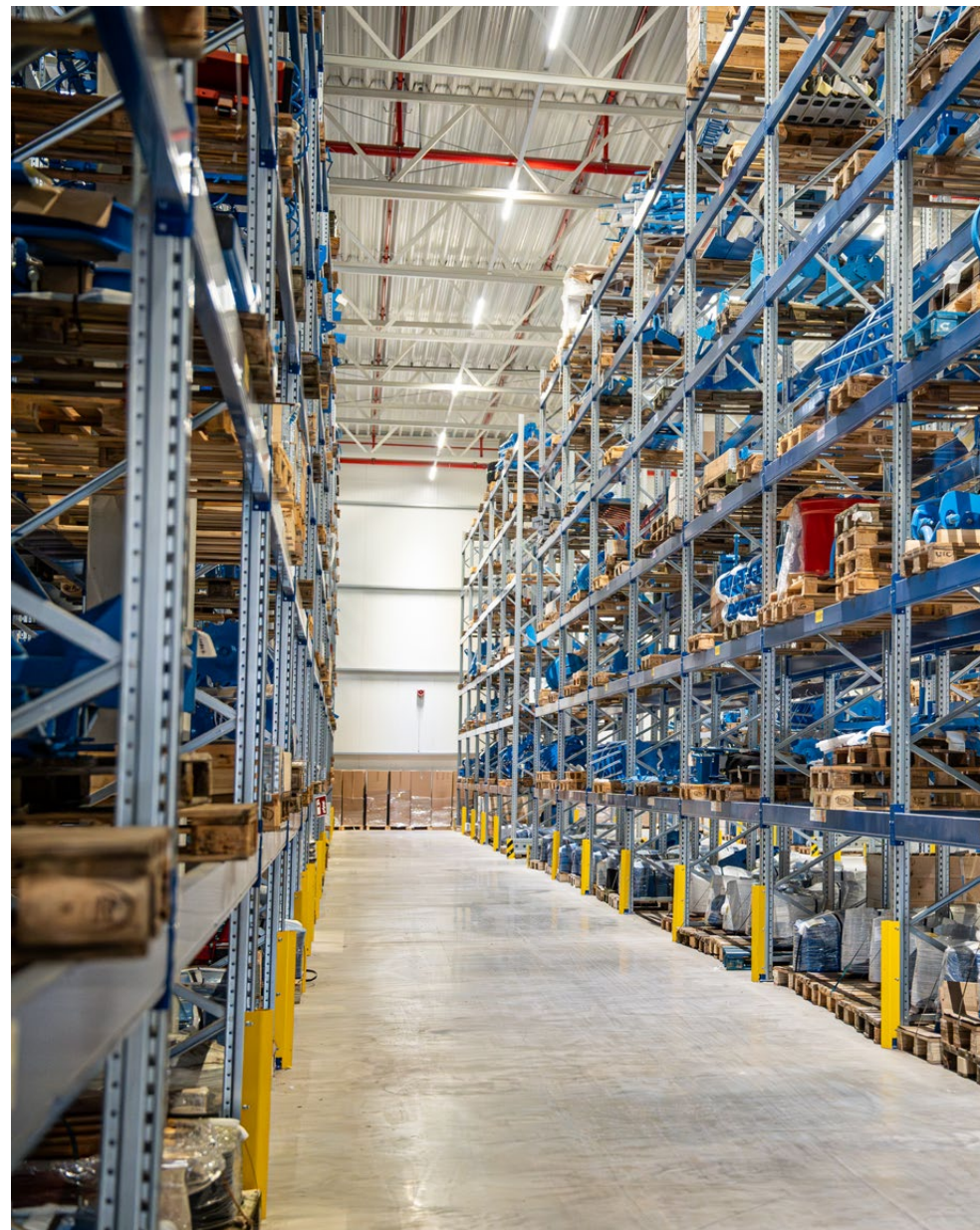
In 2025, Germany, the United Kingdom and the Netherlands were the primary contributing countries of our spend. The key categories were within our logistic services and indirect and direct spending categories.

- Indirect categories includes services: temporary staffing, professional services (consulting) and maintenance (IT, Buildings).
- Direct categories includes plant equipment, automations and material handling equipment.

Our detailed understanding of our direct spend represents 35% and indirect 49% (=16% categorised as 'other' in our supply base).

During 2025, we improved the category definitions and started implementation of a supplier relationship framework. The type of relationship with the supplier determines our requirements and the actions and activities with them.

We also reviewed, improved and refined our current Preferred Supplier List, providing a short list of key strategic partners.



05 DUE DILIGENCE

5.1 APPROACH TO RESPONSIBLE PROCUREMENT	27
5.2 SUPPLIER ENGAGEMENT PROGRAMME	29
5.3 TEMPORARY WORKERS	30
5.4 INTERNAL AUDITS	30
5.5 APPROACH TO RESPONSIBLE BUSINESS RELATIONSHIPS	30

05 DUE DILIGENCE

DP World Europe's ongoing due diligence is strengthened through our participation in the anti-slavery Civil Society Organisation's Procurement and Finance Hubs, which provide shared cross sector insights and emerging risk intelligence.

We also work directly with the anti-slavery Civil Society Organisation, whose guidance is informed by data from the United Kingdom Modern Slavery & Exploitation Helpline and its First Responder team, enabling our assessments and operational decisions to be grounded in frontline evidence. These engagements support continuous improvement in our risk identification processes and align our due diligence approach with the expectations of the United Kingdom Modern Slavery Act 2015, updated TISC guidance, the UNGPs and CCLA Benchmark.

Our procurement covers goods and services from across Europe and globally. We expect suppliers to meet our standards and extend these requirements to subcontractors.

5.1 Approach to responsible procurement

Our EU Procurement Policy and DP World Vendor Code of Conduct, define the baseline and framework for our relationship with suppliers, where all applicable international and local laws and regulations are referenced as mandatory, showing our standards and commitment to them.

A combination of contractual requirements, supplier standards and country-specific controls are set up to ensure compliance, along with checks and validations from legal and subject matter experts (SMEs).

Every dimension (i.e. financial, operations, sustainability, modern slavery) that requires adjustments due to local regulations or specific business needs are performed and registered in relevant topic templates. These templates are reviewed and approved by legal and specific SMEs before application. The selection of which one to apply, is on a case by case analysis of the supplier.

Supplier expectations

Screening and assessment:

Prospective suppliers are required to adhere to DP World Group's Vendor Code of Conduct designed to set the guidelines of how DP World Group expects its suppliers to behave when doing business. It covers treating workers fairly, following laws, keeping workplaces safe, protecting the environment and acting honestly. This helps ensure that our suppliers share the same values and standards as DP World.

Contracts:

Our contracts require suppliers to comply with all applicable laws. The Vendor Code of Conduct is part of the standard framework agreement, which means that when the supplier signs the contract, the supplier automatically agrees to the Vendor Code of Conduct. This includes the right to ask for an audit to verify the conditions agreed and applicable in the collective labour agreements or contracts. There are several levels of governance in place with each supplier, from operational in which day-to-day activities are checked, to the strategic, weekly meetings to quarterly board reports in which senior management are involved. Topics are addressed at the relevant level or escalated to the next if needed. SMEs are involved where required. For modern slavery, this includes the Procurement Sustainability Manager and the DP World Europe Sustainability team.

Vendor Code of Conduct:

The Scope states that the Code applies to “all Vendors (including their employees and their sub-contractors)”. Vendors are required to “ensure that their supply chains are in compliance with the Code and any applicable customer code(s) of conduct”. They must conduct human rights risk assessments covering “their operations and supply chains, including their sub-contractors” and “provide training on human rights standards for their employees and sub-contractors”.

- Vendors must agree to adopt and adhere to the Code as part of annual pre-qualification. Failure to maintain compliance can result in exclusion from the approved vendor list.
- Adherence to the Code, HSE standards and human rights requirements is described as non-negotiable and integrated into contractual obligations.
- Vendors must respond promptly to enquiries regarding implementation and remedial actions. Vendors must complete supply chain due diligence information requests when required.

Specific areas covered:

- The Code includes comprehensive labour standards aligned with international frameworks and compliance with ILO Conventions and UNGPs. These expectations apply both to vendors and their subcontractors.
- Prohibition of forced, bonded or involuntary labour, child labour.
- Requirements on working hours and overtime limits. Minimum wage, benefits and timely payment. Freedom of association and collective bargaining. A requirement that workers are not subjected to physical, psychological, verbal or sexual abuse.

- Ethical recruitment is addressed through: explicit prohibition of forced labour and coercion; requirement that workers must be free to leave employment voluntarily without penalty; compliance with all applicable labour laws governing contracts, wages and working conditions.
- Responsible subcontracting is a core obligation: Vendors must ensure subcontractors comply with the Code. DP World Group reserves the right to prevent a vendor from being nominated as a subcontractor and audit subcontractors via vendor obligations. Vendors must disclose conflicts of interest and supply chain risks.
- Vendors are required to: maintain accurate and detailed records for goods and services provided; accept scheduled and unscheduled site visits, using internal or external audits; respond promptly to monitoring enquiries and remedial actions; provide documents to support compliance procedures upon request; complete supply chain due diligence information requests.

Procurement process:

- During the contract definition stage, suppliers are requested to provide evidence on their capacity to fulfil our requirements in all our key dimensions.
- The process requires suppliers to review these documents and acknowledge, with their signature, that they commit to the same standards DP World Europe expects for our own operations. Onboarding is not approved until this activity is reviewed and validated.
- These processes and policies, are constantly updated and improved by the DP World Group and regional Procurement teams, to ensure that the latest regulations or any new requirements from our operations are included.

Once the supplier service and contract start, governance is defined to review and follow up on activities at different levels ensuring supplier commitment.



5.2 Supplier engagement programme

In order to actively address our procurement risks, we are developing a supplier engagement programme, which covers our ESG, ethics and regulatory commitments. We choose suppliers/partners that share our vision and ambition, including our human rights and modern slavery commitment.

In order to build up our programme, DP World Europe uses a third party partner, to support the assessment of our suppliers. Applying the platform's ethical trade audit methodology, we have additional visibility of risks in key dimensions related to human rights and social topics. The platform's database includes:

- The latest supplier audits results, findings and mitigations plans.
- Risk exposure of countries based on different dimensions (i.e. human rights, child labour, gender equality, migrant workers, natural resource use).

The process to manage our extensive supplier base is outlined below:

- Engage suppliers in waves, initially prioritised by level of spend. Information is requested via a self-evaluation questionnaire to assess their compliance to human rights and modern slavery commitments. The platform's audit methodology is applied.
- Review all available data on the platform about each supplier.

- If information on our supplier is not available, a formal engagement process is initiated with the involvement of the relationship owner within DP World Europe.
- If any risks are identified, further detailed information or audits can be requested.

During 2025 two waves were performed providing the following insights:

- 349 suppliers targeted, from which 84 fully completed the process.
- Among the suppliers who completed the engagement, 46% were related to indirect activities, 36% direct and 18% related to logistics services.
 - Indirect: the key categories were temporary staffing, IT, security and waste management.
 - Direct: plant equipment, packaging, material handling equipment and automation.
 - Supplier locations: United Kingdom (65%) | Germany (23%) | Hungary (4%) | Belgium (4%) | Netherlands (3%) | Bulgaria (1%)
- Third party audit reports of our suppliers on the platform revealed the following findings:
 - 3 critical and 54 major. 100% of the findings were closed by providing corrective actions that were validated by the auditors, or updated process/results from a new audit.
 - The main findings were related to entitlement to work, freedom of association, working hours, working conditions (safe and hygienic).

Learnings from 2025:

- Some suppliers have good visibility and knowledge about HRDD and modern slavery, while others have none or are in the early stages of establishing their HRDD programmes. Webinars and training available on the platform are a key resource (our suppliers have access once they complete their onboarding).
- Adjustments are needed to prioritise supplier onboarding, shifting to a risk perspective instead of a spend base (see 2026 plans).
- Resources required with our current approach need to be reviewed to enable the level of scale up.

Based on the 2025 learnings, the following adjustments will be made for 2026:

- We will evolve the approach to target our suppliers from countries where the potential for human rights risk is higher based on the European salient risk assessment.
- We are reviewing contracts to better encompass modern slavery requirements.
- We will continue to advance our procurement HRDD process in alignment with the UNGPs and will work with the anti-slavery Civil Society Organisation, to utilise its expertise to identify and assess risks with our suppliers and developing our policies appropriately.
- In 2026, there are plans to explore enhanced technology (i.e. AI) for a sustainability due diligence platform, covering our suppliers' human rights compliance. The aim is a faster initial assessment increasing visibility and fine tune areas in order to reduce risk.
- Also during 2026, we will enhance data available in our systems to include all our suppliers' site locations (not just registered addresses).

5.3 Temporary workers

The onboarding of temporary workers and agencies is managed through a combination of contractual requirements, supplier standards and country-specific controls to ensure compliance to international and local laws. All temporary staffing suppliers must either sign the Vendor Code of Conduct or provide their own (which should be equivalent to DP World Europe requirements). Along with the references in our policies, Procurement is proactively defining local tailored safeguards (e.g. in NL ABU, ABU Collective Labour Agreements).

In DP World Europe there is a strong emphasis on employee wellbeing and we extend the same standards equally to temporary workers. To ensure transparency on working hours, temporary workers use the same time-clocking systems as DP World Europe employees and we define the application of Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 on equal pay in our supplier negotiations. In the Netherlands Contract Logistics sites, we are aligning the pay of temporary workers with the collective work agreements for logistics as required by the Directive (EU) 2023/970 (the deadline is 2028). This is an additional protective measure for temporary workers.

5.4 Internal audits

In 2025, we conducted 15 internal audits of our contract logistic sites across Europe.

These locations were selected based on risk profiles, activities and scopes of operations. The audits included assessing compliance with our customer codes of conduct, local laws, temporary worker agency provider contracts, working hours and working conditions. Corrective action plans were established for any issues raised, including route cause, corrective actions, responsibility and close out date (maximum time allowed is 90 days).

5.5 Approach to responsible business relationships

DP World Group external ESG ratings

Our commitments are reflected in recognised ESG ratings that assess labour rights and HRDD, which are central to preventing modern slavery. While external ratings provide independent validation of the quality, transparency and robustness of our reporting, they do not replace our own due diligence processes. Rather, they complement our internal controls by evidencing the strength of our governance frameworks and highlight areas for continuous improvement. We recognise that transparency is critical, and we use ESG assessments as supplementary indicators alongside clear controls, measurable actions and demonstrable outcomes in managing modern slavery risks. Please refer to the [DP World 2025 Sustainability Report](#) for further details.

Collaboration and partnerships

Our partnership with the anti-slavery Civil Society Organisation provides access to guidance, helpline insights and survivor-informed practice.

We plan to engage with worker representatives and local stakeholders in priority geographies from 2026 onwards.

Case study

In 2025 we launched the Atlas Service (a Morocco to United Kingdom and Northern Europe logistics service). Site visits to Morocco will be incorporated to reflect the sectoral and regional context associated with the primary product being transported – fresh produce. In 2026, we will undertake these visits as part of our broader value-chain assessment on nature, climate and social risks. We will engage with our logistics partners and local stakeholders to strengthen visibility of working conditions across the route beyond tier-1 and use the findings to further inform and refine our downstream value chain due diligence processes.





06

GRIEVANCE, ESCALATION & REMEDIATION

06 GRIEVANCE, ESCALATION & REMEDIATION

We maintain confidential reporting pathways for employees, contractors, suppliers and communities.

Our Modern Slavery and Human Trafficking Policy highlights how employees and third parties, including suppliers and vendors' employees, can securely report concerns through the Whistleblowing Hotline. DP World encourages people to speak up if they believe there is unethical behaviour in the business. Emphasis is made on working in an environment that is free from any form of harassment, bullying or intimidation. The policy is contained in the contract of employment and the employee handbook. Employee forums provide another platform for employees to raise complaints or concerns. Refer to Appendix E for the different reporting pathways available.

There is an Employee Assistance Programme available for all employees to contact for any personal or work-related concerns. This is covered along with the grievance procedure during the People (HR) induction and posters are on company noticeboards.

Each business unit has its own internal grievance procedure, which is aligned with the ACAS Code of Practice. The grievance procedure provides a formal process to ensure consistency, facilitate timely resolution of issues and enable monitoring and record-keeping. Case escalation concerns are managed in line with our established policies and procedures, depending on the reporting channel used. Multiple reporting mechanisms are available, and escalation may involve line management, senior leadership, compliance, or People (HR), depending on the nature and severity of the issue. Where a concern indicates a potential legal breach or risk of serious harm to employees, escalation is handled accordingly. All escalation and investigation activities are undertaken with due consideration of data protection requirements, ensuring that any personal data shared is limited to what is necessary and supported by a justified lawful basis in accordance with GDPR obligations.

Raising concerns:

Any violations can be reported online or by phone through a dedicated 24/7 DP World Global Whistleblowing Hotline service, which is operated for the business by Navex (an independent global hotline service provider). DP World's various speak-up pathways allow for concerns to be raised anonymously where permitted by law.



Phone:
United Kingdom –
0800 048 8435

(for different country numbers please visit the website)



Online:
Whistleblowing
Hotline | Report
Ethical Concerns |
DP World



Independent support is also available:

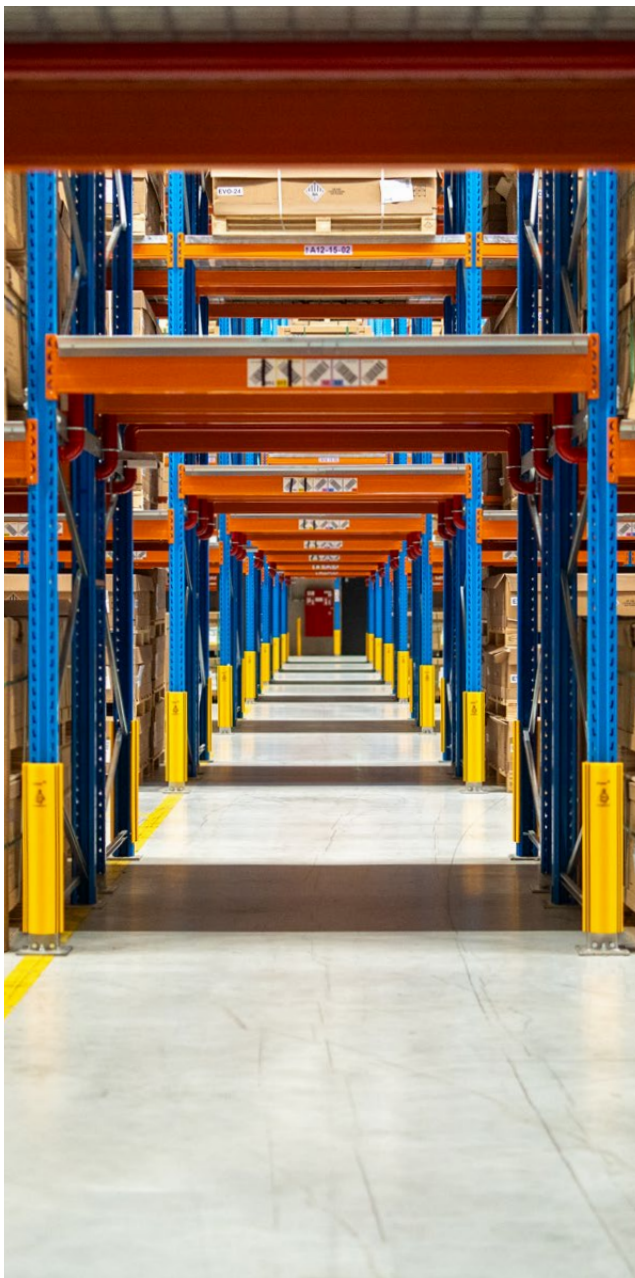
If you are worried about exploitation or something you have seen or experienced does not feel right you can contact the United Kingdom Modern Slavery & Exploitation Helpline. The helpline is free, safe and confidential, and you do not need proof to get in touch. It is available to workers, community members and anyone with a concern, and can be used anonymously if preferred.

Report concerns [online](#)

Download the [app](#)

Call the United Kingdom Modern Slavery & Exploitation Helpline: 08000 121 700

We encourage you to use these pathways if reading this statement raises any concerns or brings up experiences that you wish to report or seek advice about even if you are unsure if something might be modern slavery. Your safety and the safety of others is our priority.



Escalation and remediation framework

On receipt of a report, DP World Europe follows a structured process, in accordance with local laws, and the internal whistleblowing procedure.

DP World Europe has established comprehensive policies and procedures to protect individuals from retaliation after raising concerns. We guarantee non-retaliation for all good-faith reports and have defined investigation procedures that safeguard confidentiality and protect the reporter's identity. These protections are embedded within our governance framework, including the Code of Ethics, Anti-Corruption Policy and Modern Slavery and Human Trafficking Policy, all of which direct employees and third parties to speak-up pathways and recognise protections for reporters. Additionally, through our Vendor Code of Conduct, DP World Europe extends safe reporting pathways and anti-retaliation protections to suppliers and employees across the supply chain.

Protection, support and appropriate remedial measures are available for whistleblowers acting in good faith (also in accordance with local laws) and the internal whistleblowing procedure. DP World Europe applies the principle of proportionality – where the company's response is proportionate to the severity, impact and circumstances of the grievance.

Where a violation is substantiated, DP World Europe implements proportionate corrective and remedial measures. These may include:

- Disciplinary sanctions
- Organisational corrective measures
- Process improvement actions
- Additional training
- Notification of competent authorities, where legally required

Assessing severity

The severity of reported cases is assessed based on:

- The nature and gravity of the alleged violation
- The actual or potential impact on individuals
- The presence of coercion, intimidation or abuse of vulnerability
- Legal, operational and reputational risks

High-severity cases, including suspected forced labour, trafficking or serious human rights violations, are escalated immediately to senior leadership and, where appropriate, to competent authorities.

Disclosures and identified concerns in 2025

In 2025 there were no issues related to human rights in DP World Europe that were raised through the hotline.

Over time we intend to work with the anti-slavery Civil Society Organisation to develop our systems and processes in DP World Europe to be able to record the number of concerns raised along with the number of substantiated cases, average closure time and recurrence rates.

 Escalation process	• Acknowledgement of receipt within 7 calendar days. • Registration of the report in a secure electronic register. • Preliminary risk assessment and classification. • Independent and impartial investigation. • Feed back to the reporting person within a maximum of 3 months. • Secure retention of records for 5 years. Where necessary, cases may be escalated to senior management, DP World Internal Audit, competent authorities or law enforcement bodies.
 Key policies	• DP World Whistleblowing Policy: Allows employees and other stakeholders to report suspected wrongdoing, dishonesty, fraud or policy breaches “without any fear of retaliation”. • DP World Modern Slavery and Human Trafficking Policy: Sets out DP World’s commitment to preventing modern slavery in its operations and supply chain, through due diligence, supplier compliance, whistleblowing pathways and the ability to terminate non-compliant partners. • Code of Ethics: Commits to investigating business conduct issues “thoroughly, fairly and promptly” and protects those providing information unless acting in bad faith. • Local workplace policies: Policies linked to prevention of harassment and violence prohibit reprisals against individuals who make complaints or participate in investigations.
 Reporting pathways & processes	• Independent Whistleblowing Hotline: External and independent, free and confidential reporting mechanism for internal and external stakeholders. • Multiple reporting methods: Various routes available where concerns relate to colleagues or superiors, giving confidence and flexibility. • Confidential handling: Reports investigated effectively and confidentially, with protection of the informant’s identity as required.
 Anti-retaliation protections	• Zero-tolerance statement: Explicit commitment that retaliation of any kind will not be tolerated against those raising concerns in good faith. • Disciplinary action for retaliation: Employees engaging in intimidation or reprisal are subject to disciplinary action. • Action against attempts to unmask reporters: Attempts to identify the reporting party may result in disciplinary action.
 Procedures when retaliation is alleged	• Right to file a retaliation complaint: Reporting parties may submit a formal retaliation complaint. • Time limits and investigation: Complaint should typically be made within six months of the initial or last incident and will be investigated by the relevant People (HR), with emphasis on confidentiality and objectivity.





07 TRAINING & AWARENESS

07 TRAINING & AWARENESS

These charts focus on structured learning activities designed to build capability, decision-making and accountability in relation to modern slavery and human rights risks.

How we raise awareness

European employees: modern slavery awareness training¹⁰



Completion rate 58%
434 of 748 completed

e-learning module

30 minutes
All new employees

Content:

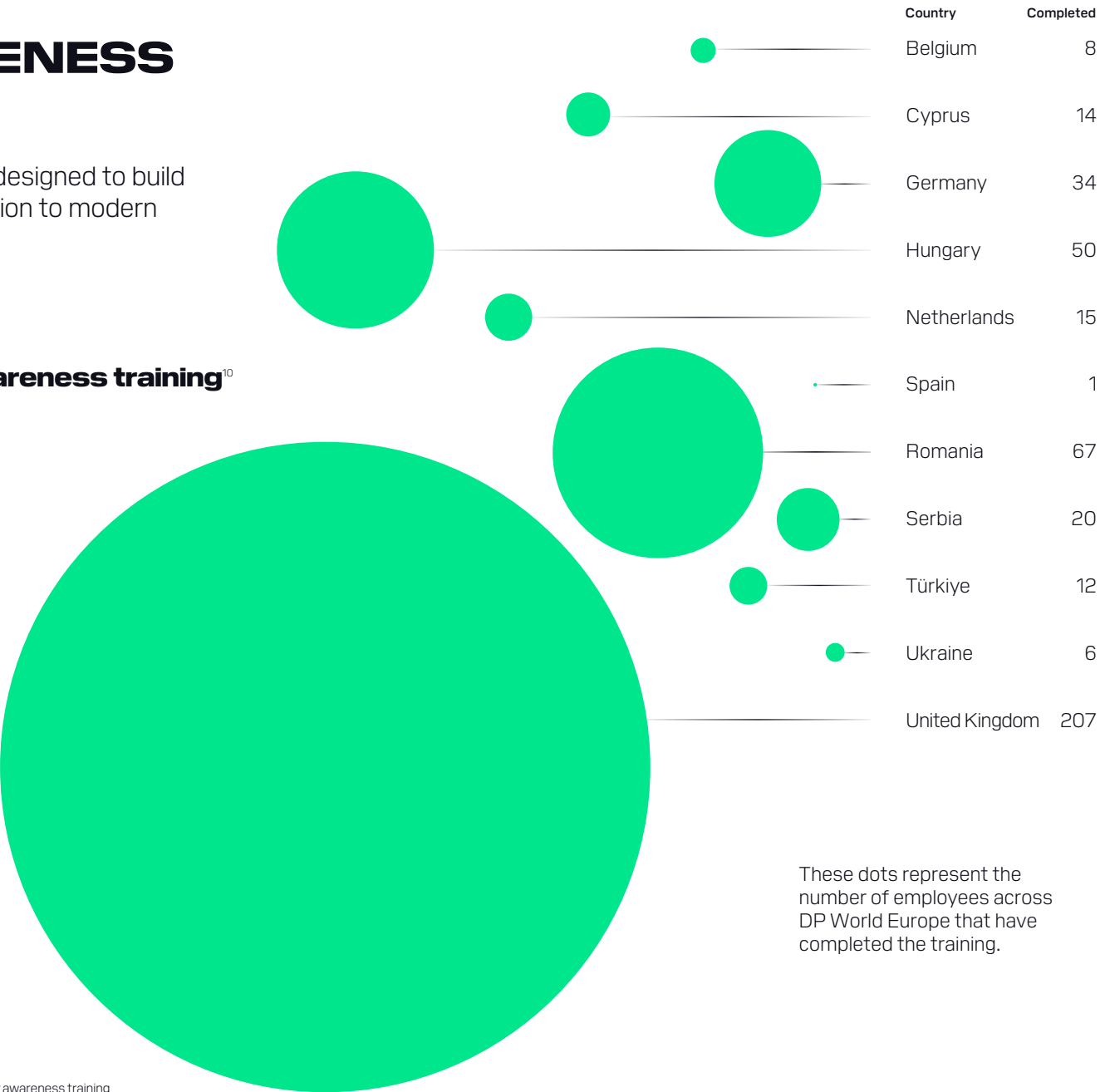
e-learning focused on how to identify victims of modern slavery and where to report suspicions.
Creating awareness, recognising the signs, taking action, case study.

Outcomes:

- Understand what modern slavery is and how it is presented in our daily lives.
- Recognise the signs of modern slavery.
- Respond and take action in order to help someone who may be a potential victim of modern slavery.

Stakeholders:

Group Sustainability



These dots represent the number of employees across DP World Europe that have completed the training.

¹⁰During the reporting period, completion rates for both our anti-bribery and corruption, and modern slavery awareness training e-learning module were significantly lower than expected. We recognise that these low training numbers may weaken the overall effectiveness of our safeguarding framework. Please refer to page 40 Training Reflections for our remedial plan.

European employees: human rights training¹¹



Completion rate 95%

138 of 146 completed

e-learning module

30 minutes

All new employees in Germany (a new system is being rolled out and was only live in Germany in 2025).

Content:

e-learning focused on how to report breaches of human rights at DP World.

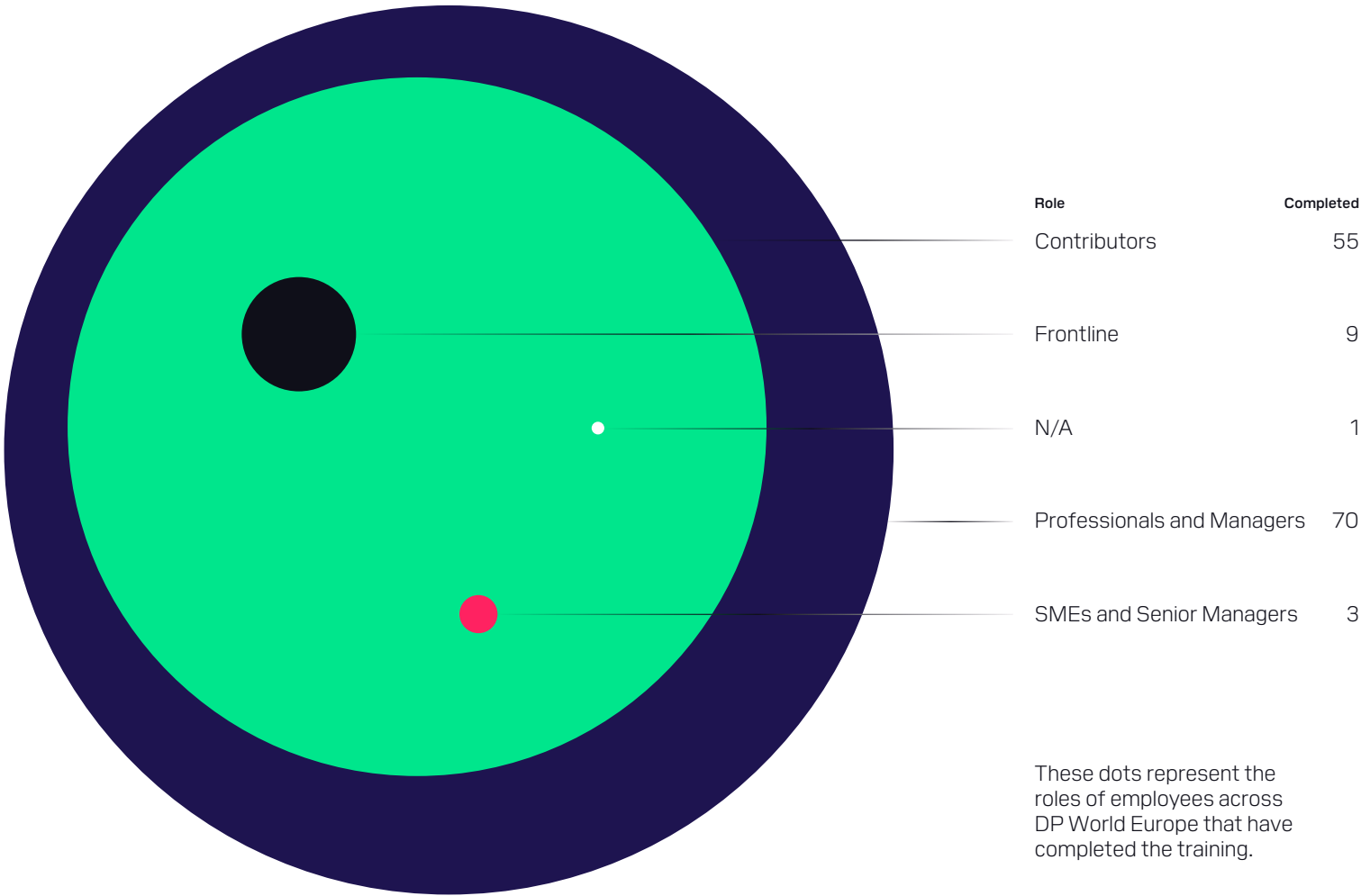
Introduction to human rights, human rights at DP World, identify and report human rights issues.

Outcomes:

- Talk about human rights and their development.
- Understand DP World commitment to human rights.
- Know how to report breaches of our DP World human rights policy.

Stakeholders:

Group Sustainability



¹¹During the reporting period, completion rates for both our anti-bribery and corruption, and modern slavery awareness training e-learning module were significantly lower than expected. We recognise that these low training numbers may weaken the overall effectiveness of our safeguarding framework. Please refer to page 40 Training Reflections for our remedial plan.

European employees: anti-bribery and corruption training¹²



Completion rate 59.1%

Assigned to 6,227 employees, 3,682 successfully completed

e-learning module

30 minutes

All employees

Content:

This course explores key concepts that drive corrupt business practices, including individual factors and presents real-life scenarios that challenge you to consider the facts.

How bribery makes its way into the shipping and logistics sector. What are facilitation “grease” payments? Case studies. Conclusion, summary and quiz.

Stakeholders:

Group Compliance

Completion rate

Austria
55.0%



Belgium
61.2%



Bulgaria
33.3%



Cyprus
46.7%



Czechia
40.0%



France
15.4%



Germany
87.5%



Hungary
57.1%



Ireland
54.6%



Italy
32.1%



Netherlands
59.8%



Poland
72.9%



Portugal
0.0%



Remote
50.0%



Romania
35.8%



Serbia
34.5%



Slovakia
64.0%



Spain
46.4%



Sweden
90.0%



Switzerland
17.6%



Türkiye
21.8%



Ukraine
24.4%



United Kingdom
44.8%



 Completed
 Not completed

¹²During the reporting period, completion rates for both our anti-bribery and corruption, and modern slavery awareness training e-learning module were significantly lower than expected. We recognise that these low training numbers may weaken the overall effectiveness of our safeguarding framework. Please refer to page 40 Training Reflections for our remedial plan.

European employees: capacity building



29

Slaughter and May Legal Workshop

1 day (Oct 2025)

European Legal team

Outcome:

Strengthened legal decision-making and governance

Stakeholders:

Slaughter and May Sustainability team



1

Master's Module – Business & Human Rights

Semester (Sept – Dec 2025)

Manager – Affected Communities

Outcome:

Advanced HRDD capability

Stakeholders:

IHRB, University of Bergen, Rafto Foundation



10

Constanta site Departmental Team Briefing

1hr (Dec 2025)

Romanian Site team
(10 reps across departments)

Outcome:

Improved operational risk detection; strengthened rights-respecting culture

Stakeholders:

Regional HRDD Programme



12

European Sustainability Team Briefing – Affected Communities

30 mins (Oct 2025)

European Sustainability team

Outcome:

Raised awareness of community risks

Stakeholders:

Internal Sustainability and HRDD teams



40

European Procurement Training

2.5 hours (Dec 2025)

European Procurement team

Outcome:

Improved identification and escalation of modern slavery risks

Stakeholders:

Sustainability, GHSE, Group Procurement DP World Human Rights leads



20

Modern Slavery Briefing to Customers

15mins (Nov 2025)

UK Logistics Park Customers

Outcome:

Increased organisational and supplier awareness; improved understanding of responsibilities; awareness of reporting routes

Stakeholders:

The anti-slavery Civil Society Organisation and European Sustainability team

Training

Awareness

Training reflections

- Root causes of low completion rates

We carried out an internal review to understand the causes behind the low completion figures. The following factors were identified:

- A switch between internal learning platforms in 2025, which temporarily disrupted reporting continuity and access for some learner groups.
- An internal delay in updating the modern slavery awareness e-learning module, which prevented wider rollout during the year and reduced overall uptake.
- Unclear requirements of local training teams linked to these modules, which affected engagement levels across regions.

- Mandatory status and expectations

Completion of both the anti-bribery and corruption and modern slavery awareness modules is intended to be mandatory for all relevant employees in Europe once new training systems have been rolled out in each country and translation of the modules has occurred. In 2026, we will clarify these requirements including expectations for completion time. We will endeavour to establish clearer accountability structures.

- Corrective actions

High level corrective actions linked to training for 2026 are set out in section 8.

Procurement:

- There is a collaborative approach between DP World Group and regional procurement teams to reinforce awareness, training resources and data availability (see page 17). Webinar and specific sessions are provided by our supplier engagement programme to our Procurement teams and suppliers to reinforce the importance of driving

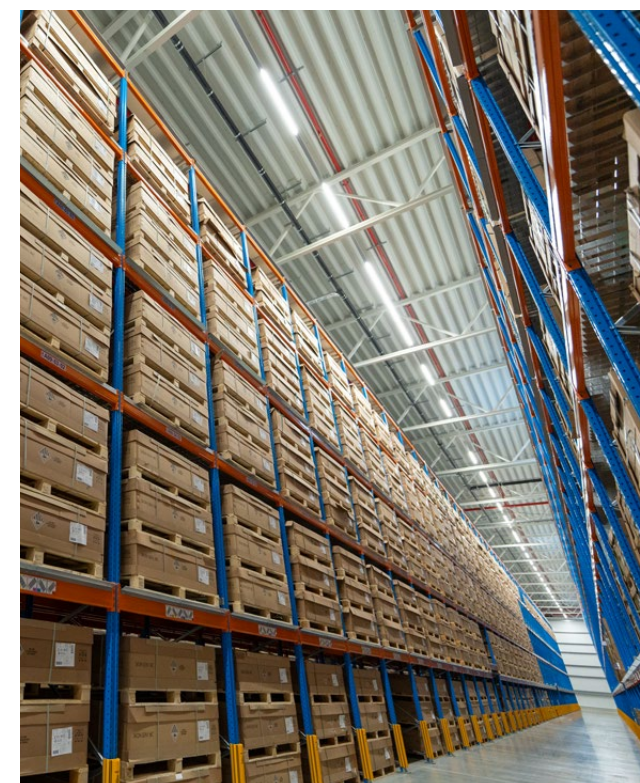
HRDD activities. There is a social section which focuses on helping our suppliers understand the reason for the engagement programme, our commitment to human rights and modern slavery, along with information on how the programme will develop and what we are requesting of them. It also provides platform visibility and the resources available. Our community and suppliers receive support from our Group Procurement and Sustainability teams to implement actions to reduce any risks highlighted during the programme onboarding process. Access to training materials on human rights is also available on the third party platform.

- DP World Europe encourages its suppliers to develop training programmes for managers and workers to implement policies, procedures and improvement goals, complying with relevant legal and regulatory requirements. This includes providing training on modern slavery.

Events

In April 2025, DP World Europe hosted an internal regional event to launch our European Sustainability Plan, bringing together senior management from across our European operations. The agenda included a dedicated panel on human rights and modern slavery, emphasising the material risks these issues pose to people, our business and our supply chains when not addressed with rigour and senior level accountability. The discussion reinforced the expectations set out in the TISC guidance, that businesses must proactively identify risks, engage meaningfully with internal and external stakeholders, and take a victim-centred, transparent approach when harm is uncovered. This event strengthened our shared understanding of these responsibilities and supported our commitment to enhancing due diligence, risk management and continuous improvement.

In July 2025, DP World Europe hosted the Design for Freedom United Kingdom Accelerator launch event at our London office, bringing together 36 participants from industry, Civil Society Organisations, academia, international organisations and government. The event focused on forced and child labour risks in construction materials supply chains and featured contributions from a member of the House of Lords, Grace Farms Foundation and the ILO, who presented sector specific child labour data. Design for Freedom reported strong engagement and onward conversations following the session.



08

FUTURE OBJECTIVES



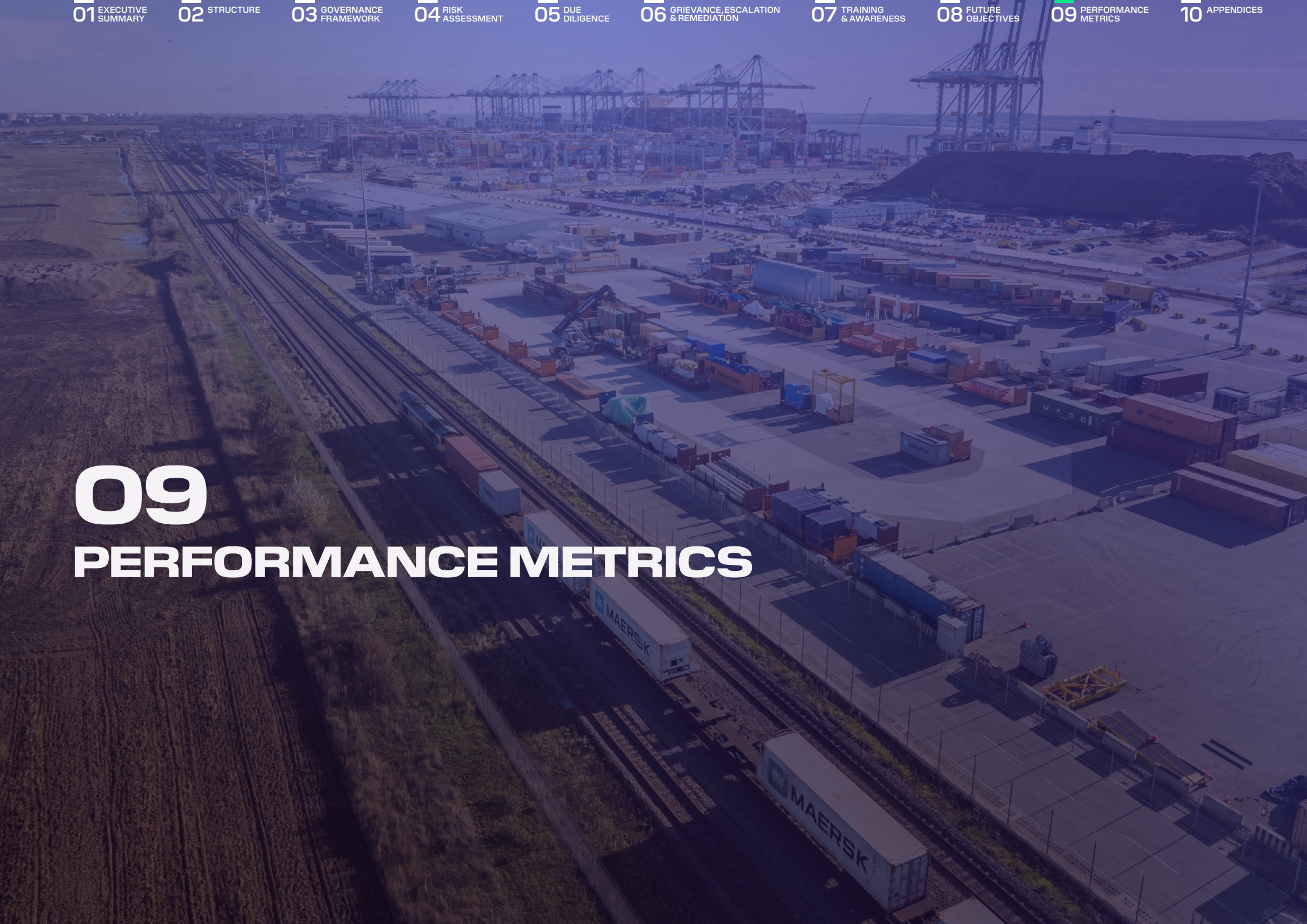
08 FUTURE OBJECTIVES

2026 High level and priority plans:

Over the next reporting year and beyond, we plan to focus on the following areas:

 Governance	- Review the European gap analysis using the results from salient risk assessment as a lens. - Establish a UK modern slavery working group to monitor progress and effectiveness. - Assess and enhance governance oversight of modern slavery across Europe throughout 2026 via partnership with the anti-slavery Civil Society Organisation and aim to create a dedicated crisis management team.	 Escalation & remediation	Aim to develop an escalation and remediation framework for Europe in partnership with the anti-slavery Civil Society Organisation.
 Risk assessment	- Revisit the European salient risk assessment in 2026 and validate findings with internal and external stakeholders in line with UNGPs and OECD Guidelines. - Review, enhance and create a plan to strengthen HRDD processes for the European region. - Expand on the procurement HRDD approach related to risk identification, risk management and supplier engagement programme as well as procurement criteria related to HRDD. - Aim to introduce internal security audits across the European region - Build an internal European intelligence tool covering MSHT.	 Training	- Plan to develop and roll out a new online modern slavery e-learning module (2026/2027) for Europe. - European teams intend to collaborate with DP World Group to develop a unified procurement sustainability training programme. - Plan to deliver a supplier engagement workshop with the anti-slavery Civil Society Organisation to equip suppliers to prevent, identify and respond to risks (2026/2027). - Aim to launch a 30-minute sanctions and data privacy e-learning module for targeted audiences.
 Stakeholder engagement	Collaborate with the anti-slavery Civil Society Organisation, and works councils to better understand local human rights risks across Europe.	 KPIs	Introduce a new KPI suite spanning governance, risk assessment, grievance, training and security, including baselines and 2026 targets. Refer to section 9 for further details.

09 PERFORMANCE METRICS

An aerial photograph of a large industrial port facility, likely a container terminal. The foreground shows several rail tracks with freight cars, some of which are white with the 'MAERSK' logo. To the right of the tracks is a large paved area filled with numerous colorful shipping containers (blue, red, yellow, green) stacked in rows. In the background, several large gantry cranes are visible, along with more containers and industrial structures. The sky is clear and blue. The overall scene depicts a busy logistics and shipping hub.

09 PERFORMANCE METRICS

The following KPIs were developed collaboratively by DP World Europe teams and our external partners. They integrate leading and lagging indicators and use qualitative and quantitative insights. Lessons learned will shape policies, processes and training across 2026.

Initiative	KPI	Target	Indicator	Owner	Review cadence	Initiative	KPI	Target	Indicator	Owner	Review cadence
Governance	Europe salient risk assessment updated and validated with stakeholders	Q4 2026	Lead	European Sustainability	Annual	Stakeholder Engagement	# engagement activities completed	Baseline 2026	Lead	European Sustainability	Annual
Governance	UK modern slavery (MS) governance meetings held with working group and actions tracked	At least 4 meetings in 2026	Lead	UK Modern Slavery team	Annual	Grievance, Escalation & Remediation	MS escalation pathway established and documented for the UK	Q4 2026	Lead	European Sustainability	Annual
Governance	% of policies reviewed for MS and HRDD integration	Baseline 2026	Lead	Policy Owners	Annual	Grievance, Escalation & Remediation	# concerns raised (baseline 0 in 2025)	Improvement vs baseline	Lag	European Sustainability	Annual
Risk Assessment	% high-risk suppliers reviewed against MS standards	5%	Lead	European Procurement	Annual	Training – Employees	MS e-learning completion (baseline 58%)	≥80% ¹³ 2027	Lead	European HR	Annual
Risk Assessment	Human rights risk maps completed for countries and business pillars	>3 high-risk countries/ pillars	Lead	European Sustainability	Annual	Training – Employees	Human rights training (Germany baseline 95%)	Maintain 95%+	Lead	European HR	Annual
Risk Assessment	% European salient risks with mitigation actions	Baseline 2026	Lag	European Sustainability	Annual	Training – Employees	Anti-bribery and corruption training (baseline 59.1%)	Improvement vs baseline	Lead	European HR	Annual
						Training – Employees	Security training	500 in 2026	Lead	European Security	Annual

¹³% completion rate reflects our new internal system for training which will not be fully rolled out across DP World Europe in 2026



DP WORLD

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Peninsular and Oriental Steam Navigation Company modern slavery and human trafficking statement for the financial year ended 31 December 2025. It has been approved by The Peninsular and Oriental Steam Navigation Company's Board of Directors.

Rashid Abdulla
CEO & MD at DP World Europe
Director, The Peninsular and Oriental
Steam Navigation Company
Date: 26 June 2026

10 APPENDICES

A	SUBSIDIARIES COVERED	47
B	TISC REPORTING-AREA MAPPING TABLE	48
C	KEY POLICIES CONCERNING MODERN SLAVERY AND HUMAN TRAFFICKING	49
D	DATA INPUTS AND COUNTRY RISK WEIGHTING SERVICES	52
E	REPORTING PATHWAY TABLE	53
F	TISC LEVEL 1 & 2 GAP CHECKLIST	54

Appendix A: Subsidiaries covered

2DS B.V.	DP World Logistics Ireland Holding B.V.	London Gateway Services Limited	DP World Chemical Transport GmbH
Antwerp Gateway NV	DP World Logistics Ireland International Group Unlimited Company	P&O Bulk Shipping Limited	DP World Europe Fleet Management GmbH
Arcese DP World France SAS	DP World Logistics Ireland Treasury Services Designated Activity Company	P&O Dover (Holdings) Limited	DP World Freight Poland Sp. z o.o.
Arcese DP World Holding S.p.A.	DP World Logistics Ireland Unlimited Company	P&O France S.A.S.	DP World Global Forwarding Switzerland GmbH
Arcese DP World Poland Sp. z o.o.	DP World Logistics Italy S.R.L.	P&O Garden City Investments B.V.	DP World Logistics Austria GmbH
Arcese DP World S.p.A.	DP World Logistics Netherlands B.V.	P&O Netherlands B.V.	DP World Logistics Chemical Germany GmbH
Beaufort Insurance Company Limited	DP World Logistics Retail UK Ltd.	P&O Overseas Holdings Limited	DP World Logistics Czech s.r.o.
British India Steam Navigation Company Limited	DP World Logistics Romania SRL	P&O Pension Funds Investments Limited	DP World Logistics Germany B.V. & Co. KG
Burjtrade UK Limited	DP World Logistics Slovakia s.r.o.	P&O Properties International Limited	DP World Logistics Industrial Germany GmbH
CNS Digital Trade Solutions Limited	DP World Logistics Spain, S.A.	P&O Scottish Ferries Limited	DP World Logistics Intermediate Holding B.V.
Community Network Services Limited	DP World Logistics Technology Poland Sp. z o.o.	P&O Scottish Ferries Ship Management Limited	DP World Logistics Poland sp. z o.o.
Constanta South Container Terminal SRL	DP World Logistics UK Ltd	P&O Tankships Investments Limited	DP World Logistics Steel Germany GmbH
Container Terminal Yuzhny B.V.	DP World Properties Liman Isletmeleri Anonim Sirketi	POETS Fleet Management Limited	DP World Logistics Sweden AB
DP World ad Novi Sad	DP World Red B.V.	Rotterdam World Gateway B.V.	DP World Palletways Group Ltd.
DP World Antwerp Container Services NV	DP World Tarragona SA	SCT Nominees Limited	DP World Transport B.V.
DP World Antwerp Customs Desk NV	DP World TIS Pivdennyi Ltd	SCT Pension Trustees Limited	DP World Türkiye Freight Lojistik A.Ş.
DP World Antwerp Empty Depot Services	DP World Türkiye Lojistik A.Ş.	Solent Container Services Limited	FoodTankers Polska Sp. z o.o.
DP World Antwerp Holding N.V.	DP World Yarımca Liman İşletmeleri A.Ş.	Southampton Container Terminals Limited	FoodTankers Transport Kft.
DP World Antwerp Terminals N.V.	DPW Europe Reefer Limited	Swissterminal AG	Imperial Con-Pro GmbH
DP World Blue B.V.	DPW Logistics Portugal S.A.	Swissterminal Birsfelden AG	Imperial Holdings International B.V.
DP World ENAF B.V.	Eurofos SARL	Swissterminal France SAS	Imperial Logistics International (UK) Limited
DP World Freight Forwarding UK Ltd	European Ferries Limited	syncreon (IOM) Limited	Imperial Logistics Korlátolt Felelősségű Társaság
DP World Holding UK Limited	Evyap Deniz İşletmeciliği Lojistik ve İnşaat Anonim Sirketi	syncreon Asia Holdings (UK) Limited	Imperial Logistics NV
DP World Inland B.V.	Expert Terminal Services Limited	syncreon ATM, S.L.	Imperial Mobility Finance B.V.
DP World Intermodal B.V.	Fos HoldCo	syncreon EMEA Unlimited Company	Imperial Mobility International B.V.
DP World Intermodal GmbH	Havenbedrijf Antverpia NV	syncreon European Holdings Unlimited Company	Kombiverkehr Deutsche Gesellschaft für kombinierten Güterverkehr mbH & Co. Kommanditgesellschaft
DP World Liege SA	LG Park Freehold Limited	syncreon Global (Ireland) Unlimited Company	Palmetal-Armazenagem E Serviços, SA
DP World Limassol Limited	LG Park HT7 Limited	syncreon Rus Holding B.V.	RCS Risk & Claims Services GmbH
DP World Limited	LG Park Leasehold Limited	syncreon Rus OOO	Regent Insurance Brokers (Europe) GmbH
DP World Logistic doo Novi Sad	Liege Container Terminal SA	syncreon UK Holdings Limited	Regent Marine Assekuranzmakler GmbH
DP World Logistics Automotive Germany GmbH	London Gateway Limited	Thames Freeport Limited	Rubiships Ltd.
DP World Logistics Belgium BV	London Gateway Logistics Limited	The Move to -15C Coalition Limited	UCON GmbH Umweltmanagement Consulting Gesellschaft mit beschränkter Haftung
DP World Logistics Europe B.V.	London Gateway Logistics Park Development Limited	The Peninsular and Oriental Steam Navigation Company	
DP World Logistics Europe GmbH	London Gateway Logistics Park Management Limited	UK EDI Limited	
DP World Logistics France S.A.S	London Gateway Port Holdings Limited	ChemStore GmbH	
DP World Logistics High Tech Europe GmbH	London Gateway Port Limited	DP World Chemical Logistics B.V.	
DP World Logistics Hungary Kft.	London Gateway Port Railway Limited	DP World Chemical Logistics NV	
DP World Logistics Ireland Acquisition Unlimited Company		DP World Chemical Transport B.V.	

Appendix B: TISC reporting-area mapping table

TISC Reporting Area	Department	Responsibilities / Activities
Organisation Structure & Supply Chains	Legal/Compliance	Advises on applicable legal regulations and industry standards
	Risk/Audit	Audit & Risk Committee oversees internal controls and risk-management systems
	Group Sustainability	Supports development and implementation of the DP World Human Rights Policy and Statement; member of the Human Rights Working Group responsible for advising on policy implementation
Policies	People (HR)	Implements DP World Code of Ethics including intolerance of forced labour; ensures sign-off
	Legal/Compliance	Maintains compliance frameworks; ensures adherence to anti-slavery laws
	Procurement	Enforces Modern Slavery requirements in supplier contracts
Due Diligence	People (HR)	Conducts background verification, ID and immigration checks on employees
	Legal/Compliance	Sets legal due-diligence expectations for suppliers and supplier contracts, including specific clauses to be included
	Procurement	Ensures due diligence carried out on suppliers and that contracts contain appropriate due diligence requirements
	Risk/Audit	Human Rights Policy includes compliance reviews and audits
	European Sustainability	Leads HRDD activities

TISC Reporting Area	Department	Responsibilities / Activities
Risk Assessment	Legal/Compliance	Supports identification of legal and regulatory risks
	European Sustainability	Contributes to identifying human rights risks as part of reporting and monitoring processes; supports escalation and corrective action recommendations
	Risk/Audit	Audit & Risk Committee oversees risk systems
	Procurement	Supplier commitment in our Procurement Policy, Vendor Code of Conduct and Contract to report any potential slavery risk against international and local legislation
	People (HR)	Investigates discrimination/harassment protecting vulnerable workers
Effectiveness Measures	Risk/Audit	Annual self-assessments and internal audits
	European Sustainability	Reports on progress against human rights commitments, including monitoring policy implementation
	Procurement	Suppliers report on implementation of mitigation plans for highlighted risks; Procurement are building a proactive approach for risk management
Training	People (HR)	Delivers ethics sign-off, inclusion and diversity training, HR and security training
	Legal/Compliance	Provides regulatory guidance
	European Sustainability	Supports modern slavery and human rights training activities

Appendix C: Key policies concerning modern slavery and human trafficking include:

Policy	Description	Languages	Alignment with International Standards
DP World Recruitment Policy	Provides clear, DP World-wide standards that make recruitment fair, merit-based and fully compliant with local legislation. Prohibits child/forced labour. It embeds our commitment to preventing MSHT through the design and implementation of ethical recruitment and selection processes, including fair hiring practices, transparency, and adherence to applicable labour laws across all jurisdictions.		The UDHR, ILO Core Labour Standards, UNGPs, UN Global Compact Principles, IFC Performance Standards and the UN SDGs
DP World HSE Policy	Sets out DP World’s overarching goals and commitments on health, safety and environment and establishes the framework (the DP World HSE Management System) used to protect people, communities and the environment while driving continual improvement. DP World HSE vision, mission, Zero Harm culture.	All DP World companies are required to translate it	Aligns with ISO 14001 and 45001
DP World Human Rights Policy	Establishes the overall framework for how DP World respects, supports and promotes human rights across its own operations and its extended supply chain. Informs internal stakeholders of DP World’s position and defines the business practices that underpin that commitment.		UDHR, ILO Declaration on Fundamental Principles and Rights at Work, UNGPs, UNGC 10 Principles, IFC Performance Standards on Environment and Social Sustainability, SDGs
DP World Modern Slavery & Human Trafficking Policy	To mitigate the risks associated with any act of MSHT within DP World, its suppliers and business partners by clearly stating the position of DP World and the actions which might result due to any violation.		Aligned with modern slavery legislation expectations

Policy	Description	Languages	Alignment with International Standards
DP World Sustainability Partnership Policy	To describe the governance, roles/ responsibilities and processes that apply when DP World enters into Sustainability Partnerships and to clarify how these differ from short-term donations handled by the DP World Foundation. The Policy therefore guides business units (BUs), regions and divisions on approval thresholds, due diligence, reporting and transparency requirements for any partnership that supports the OWOF sustainability strategy. MSHT are addressed briefly, through an exclusion that prevents partnerships with organisations involved in human rights abuses or modern slavery.		Aligned with SDGs. Impact measurement and public reporting follow the Business for Societal Impact (B4SI) Framework, the global standard for community investment measurement
DP World Sustainability Policy	Sets out DP World’s approach to sustainability and its key priorities and focus areas aligned with stakeholder expectations and to strengthen and support sustainability initiatives and programmes.		UNGC and its 10 principles, SDGs, GRI Sustainability Reporting Standards, UDHR, ILO Declaration on Fundamental Principles and Rights at Work, UNGPs
DP World Volunteering Policy	Establishes the framework that enables employees worldwide to take part in company-supported volunteering while embedding a culture of social responsibility and positive community impact. Sets out eligibility, leave entitlement (up to two working days per year), risk-management and behavioural expectations so that activities are safe, ethical and aligned with OWOF and the DP World Foundation strategy.		

Policy	Description	Languages	Alignment with International Standards
DP World Whistleblowing Policy	Provides the means and appropriate communications, and to encourage and give stakeholders the confidence and guidance to report all genuine suspected wrongdoing, dishonesty and fraudulent matters in a timely manner, while ensuring confidential, effective investigation and protection of the whistleblower's identity.	24 languages	
Europe Procurement Policy	Defines the European DP World procurement processes, roles and responsibilities and related activities for all countries and business pillars in Europe. Founded on the principles outlined in the DP World Procurement Policy to ensure that all goods and services are procured in a transparent manner, with attention to sustainability, and in the best interests of DP World. MSHT provisions are included as standard contract clauses in our tender-related documentation.		Alignment with ISO 9001, ISO 14001, ISO 45001, ILO conventions, ESRS, CSRD/CSDDD
DP World Human Rights Statement	The Statement publicly affirms DP World's commitment to respect and support the human rights of its employees, supply-chain workers and surrounding communities. It explains what human rights means to DP World, sets out the key issues DP World focuses on (e.g. safety, labour rights, inclusion and diversity, responsible procurement and community engagement) and serves as a touch-point for all stakeholders on the company's expectations and programmes.		UNGPs, UDHR ILO Declaration on Fundamental Principles and Rights at Work, IFC Standards on Environment Social Sustainability, SDGs, UNGC 10 Principles

Policy	Description	Languages	Alignment with International Standards
Just Transition Statement	The Statement sets out DP World's commitment to ensure the transition to a low-carbon economy is fair and inclusive, so that the benefits of decarbonisation and green growth are shared equally and vulnerable groups are protected. It reflects DP World's commitment to supporting workers, communities, and value-chain partners as the business and wider economy transition toward a low-carbon and more sustainable future.		
Gender Equality Statement	Sets out DP World's vision and roadmap for achieving greater gender equality across all business units, supporting the OWOF and our commitment to UN SDG 5 on Gender Equality.		United Nations SDG 5: Gender Equality, United Nations Women's Empowerment Principles
DP World Code of Ethics	Sets common behavioural standards for all DP World employees, contractors, third-party agents and representatives, ensuring they always act with integrity, professionalism and in compliance with local laws and DP World policies.	20 Languages	UNGC 10 Principles
Vendor Code of Conduct	Promotes ethical business and professional conduct and compliance with applicable laws and regulations taking into account different areas including respect for human rights and fair labour practices, thereby enabling a sustainable relationship with our vendors wherever we operate.		UN GC, UNGPs, ILO Core Conventions, OECD Guidelines, ISO 14001, OHSAS 18001 (ISO 45001), Ethical Trading Initiative, Electronic Industry Code of Conduct, Social Accountability International (SA 8000), UN Convention Against Corruption, Science Based Targets, Eco-Management and Audit Scheme, etc

Policy	Description	Languages	Alignment with International Standards
Procedures for Community Investment	To give business units, regions and divisions step-by-step guidance for strategic community investment at DP World and the requirements and procedures for running community investment projects. The Toolkit covers the decision tree, approval form, due-diligence, grant agreement, treatment of sensitive projects, volunteering and mandatory use of the Sustainability System. Activities are guided by structured stakeholder engagement, ensuring projects respond to local community needs in locations where DP World operates.		All community investment data is collected in line with the B4SI framework
HSE Regional Procedures & Guidelines	Defines regional requirements and operational procedures to ensure the health, safety, security and environmental protection of employees, contractors, visitors and assets across our European operations. Supports risk prevention, incident management, regulatory compliance, and continuous improvement.	English (local translations available where required)	ISO 45001, ISO 14001, ISO 28000, applicable EU HSE legislation

Policy	Description	Languages	Alignment with International Standards
Europe Community Resilience Plan (CRP)	Provides a framework for community investment across Europe, addressing climate-related risks such as extreme weather, biodiversity loss and resource scarcity. Integrates Just Transition principles and promotes co-creation, transparency, accountability, and measurable social impact for affected and vulnerable communities.	English (local adaptations and translations as required for community engagement)	UN SDGs, UNGPs on Business and Human Rights, OECD Guidelines, Just Transition principles
Declaration of Basic Principles for the Protection of Human Rights and the Environment	Establishes DP World Logistics Germany BV & Co. KG and its affiliates' commitment to protecting human rights and the environment in accordance with the German Supply Chain Due Diligence Act. Sets expectations for responsible business conduct across operations and supply chains. Includes legacy companies.	German and English	German Supply Chain Due Diligence Act (LkSG), UNGPs, OECD Guidelines, ILO Core Conventions

Appendix D: Data inputs and country risk weighting services

- ITUC Global Rights Index 2024 – Labour rights
- World Justice Project Rule of Law Index 2024 – Governance strength
- Walk Free Global Slavery Index 2023 – Vulnerability and government response
- Transparency International Corruption Perceptions Index 2024
- US Department of State Trafficking in Persons Report 2025
- ACLED Conflict Severity Index
- Children’s Rights in the Workplace Index 2023
- UNDP Gender Inequality Index (GII)
- UNDP Inequality Adjusted Human Development Index (IHDI)
- Freedom House ‘Freedom in the World’ Score
- National Action Plans on Business and Human Rights (GlobalNAPS.org)

Appendix E: Reporting pathway table

Reporting Pathway	Description	Confidential/ Anonymous?	Languages	How it is communicated	Frequency of review
Whistleblowing Hotline	Independent, externally managed channel for reporting severe ethical breaches including forced labour, trafficking, fraud and health and safety concerns	Confidential and can be anonymous where permitted by law	Multiple languages	Policy issued on joining the company; discussed during HR induction, referenced in employee handbook; posters displayed; policies available in rest areas	Included in Code of Conduct Training rolled out annually
Grievance Procedure	Internal processes for raising concerns		English	Policy issued on joining the company; discussed during HR induction, referenced in employee handbook; posters displayed; policies available in rest areas	Included in Code of Conduct Training rolled out annually
Email addresses	Site has a HR Manager, Site Manager and QESH Manager whom individuals can raise concerns with	Confidential and can be anonymous	Multiple languages		
Employee Forum	Internal communications forum held with employees and operational management team		English	Forum dates displayed on the company noticeboards	
Employee Assistance Programme	Employee benefit			Discussed during HR induction, referenced in employee handbook; posters displayed	
Works Councils /Unions	Employees can raise concerns through worker representatives or unions		Multiple languages		

Appendix F: TISC Level 1 & 2 gap checklist

TISC Area	Requirement summary	Status (Y/N / Partial)	Notes
Declaration	Clear section 54 statement; period; entities covered; consultation with subsidiaries	Partial	Section 54 basis, reporting period (1 Jan–31 Dec 2025) and DP World Europe scope are clearly set out in Declaration (including explanatory footnote on scope). Missing an explicit statement on consultation with subsidiaries in preparing the statement.
Business & structure	Detailed operations, DP World Europe entities, workforce profile, supply chain overview	Y	Operations are described in depth (divisions, footprint, sites, sector solutions), plus workforce profile. Supply chain overview is covered in Section 4.4.
Governance	Roles, committees, escalation, policy suite with links and review cycles	Partial	Roles and forums are described. A summary of policies in the Appendix C, governance, some external policy links are available.
Operations	Operational risk assessment methodology, findings, case study	Partial	Section 4.3 sets out a European salient-risk assessment methodology aligned to UNGPs/OECD Guidelines, data sources, some vulnerable groups and high-risk geographies.
Supply chain	Mapping (% spend by location), salient risks, due diligence, audits, worker voice, responsible exit	Partial	Stronger coverage on due diligence, supplier expectations and contract audit rights. Salient risks are integrated.
Downstream	Value chain mapping and risks; oversight of partners /investees	Partial	Stated in the DP World policies.
Grievance & remedy	Reporting pathways for all rightsholders; remediation framework and examples	Partial	The document sets out multiple reporting pathways, a clear escalation process table, and a remediation framework with proportional measures and anti-retaliation protections.
Training	Role-specific training coverage and effectiveness; supplier training	Y	An extensive training inventory is included plus supplier webinars within the engagement waves. Completion rates and root-cause analysis for low completions are transparent, with corrective actions planned.
Effectiveness	KPIs (leading and lagging), baselines, progress, governance, assurance	Partial	Section 9 sets KPIs with targets. Baselines exist for several metrics, but some are baseline 2026 or improvement vs baseline without numeric targets; assurance narrative is brief.
Approval	Board approval details and signature	Y	Completed.