



DP WORLD

MODERN SLAVERY

DP World Europe
Transparency Statement

MODERN SLAVERY ACT 2015 STATEMENT FOR THE YEAR ENDING 31 DECEMBER 2024

DP World 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 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.

This statement, pursuant to Section 54(1) of the Modern Slavery Act 2015, sets out the steps we have taken to prevent modern slavery and human trafficking in our business and supply chain in the year ending 31 December 2024 as well as our plans for the current year. It covers DP World Europe* and the P&O Ferries group of companies (P&O Ferries)** only. For other DP World company statements please see the relevant company website.

*DP World Europe encompasses entities in the DP World Group in Europe undertaking Ports & Terminals, Contract Logistics and Freight business activities (excluding P&O Ferrymasters). This statement is made by The Peninsular and Oriental Steam Navigation Company which acts as the European regional office entity responsible for overseeing these business verticals and is the holding company of many of the relevant entities. This statement is signed by a director of this entity.

**P&O Ferries Division Holdings Limited group of companies (excluding the P&O Ferrymasters group of companies)

HIGHLIGHTS

// OUR PROGRESS TO DATE – SEE OUR EFFECTIVENESS SECTION TO READ MORE

OVER THE LAST YEAR WE HAVE

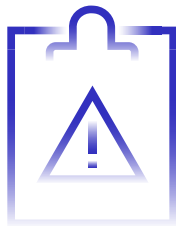
DP World Europe:



Appointed a Director of Modern Slavery & Human Rights for Europe



Started the drafting of our European Human Rights, Modern Slavery and Wildlife Trafficking Programme



Initiated a European Salient Risk Assessment on our value chain for DP World Europe and the London Gateway site*



Facilitated an information exchange regarding the Human Rights, Modern Slavery & Wildlife Trafficking Programme across various regions

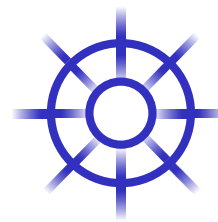


Collaborated and actively engaged with various external anti-slavery civil society organisations (CSOs) aimed at addressing modern slavery within our business value chain

P&O Ferries:



Updated our 2024 Modern Slavery and Human Trafficking Policy and Modern Slavery and Human Trafficking Statement



Notified the UK Government Department for Transport of P&O Ferries' commitment to signing the published Seafarers' Charter**

*Refers to London Gateway Port and London Gateway Park **Link to Seafarers' Charter

HIGHLIGHTS	STRUCTURE	GOVERNANCE	DUE DILIGENCE	RISK ASSESSMENT	EFFECTIVENESS	TRAINING	OUR FUTURE PLANS
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STRUCTURE
// OUR ORGANISATION’S STRUCTURE, BUSINESS AND SUPPLY CHAIN

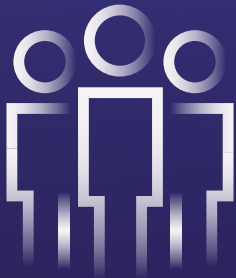
OUR BUSINESS

DP World Europe and P&O Ferries Group are both part of DP World.

DP World exists to make the world’s trade flow better, changing what’s possible for our customers and the communities we serve globally.

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 and marine services, DP World helps trade flow across Europe and the rest of the world. We serve industries like Tech, Chemicals, Automotive, Engineering and 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.

25,000+
employees



364
locations



30+
countries

DP WORLD EUROPE

DP WORLD’S OPERATIONS ACROSS EUROPE COMBINE LOCAL EXPERTISE WITH THE GLOBAL TRADE NETWORK, OFFERING END-TO-END LOGISTICS SOLUTIONS FROM FACTORY FLOOR TO CUSTOMER DOOR.

<u>WEST:</u>	<u>EAST:</u>	<u>NORTH:</u>
BELGIUM	ALBANIA	DENMARK
FRANCE	BELARUS	ESTONIA
ITALY	BULGARIA	FINLAND
NETHERLANDS	BOSNIA & HERZEGOVINA	LATVIA
PORTUGAL	CROATIA	LITHUANIA
SPAIN	CYPRUS	NORWAY
	GREECE	REPUBLIC OF IRELAND
<u>CENTRAL:</u>	KOSOVO	SWEDEN
AUSTRIA	MOLDOVA	UNITED KINGDOM
CZECHIA	NORTH MACEDONIA	
GERMANY	ROMANIA	
HUNGARY	SERBIA	
POLAND	SLOVENIA	
SLOVAKIA	TÜRKIYE	
SWITZERLAND	UKRAINE	



OUR PURPOSE

To make trade flow and change what’s possible for everyone.

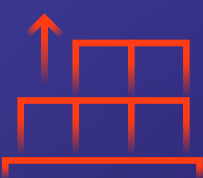
We aim to achieve this with fast, sustainable movement of products through a single platform for trade. This is our north star. It guides every decision we make and allows us to make a meaningful difference to the world. Whatever we do, wherever we do it, it all leads here.

Good governance is core to our business achieving its objectives and vision as a Group: to lead the future of world trade.

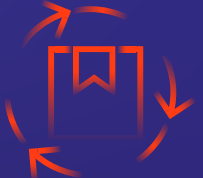


TECHNOLOGY-LED SOLUTIONS TO REDUCE INEFFICIENCIES ACROSS THE SUPPLY CHAIN

Visibility and transparency, automated planning, digital rates, instant access and control, trade finance and insurance, enterprise IT solutions and systems plus B2B eCommerce.



102m+ TEU*
global capacity



10% of global
containerised
trade moves
through our
network



*Twenty foot Equivalent Unit



Parent company is P&O Ferries Division Holdings.*

P&O Ferries: Connecting the UK and Europe for nearly two centuries for both tourist elements and freight.

FOR PASSENGERS:

- Over 187 years of experience connecting the UK and Europe, providing vital and long-term jobs at our ports across the UK and Europe.
- Upgraded passenger experience with enhanced accessibility, more food and lounge options on-board, duty-free shopping and pet lounges.
- P&O Ferries carries more passengers and more freight than any other ferry operator on the Dover to Calais route.

FOR FREIGHT:

- A reliable, cost-effective part of customers’ supply chains between the UK and Europe. Our focus is on punctuality and ensuring the fastest possible transit times.
- Operates integrated road and rail links to countries across the continent, including Italy, Poland, Germany, Spain and Romania with our partner P&O Ferrymasters.
- ‘Turn-up and go’ Space Charter with Irish Ferries on the Dover-Calais route to reduce freight wait times by up to 25%.

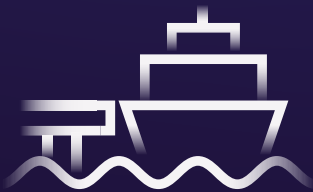
*Principal employer P&O Ferries Limited: • P&O Ferries Limited (English employees) • P&O European Ferries (Irish Sea) Limited • Larne Harbour Limited (both Cairnryan and Larne employees) • P&O North Sea Ferries Limited (Hull employees) • P&O Short Sea Ferries Limited (Calais Employees) • P&O North Sea Ferries BV (Europort and Zeebrugge employees)



P&O Ferries handles over £86bn** of trade in goods across its UK ports per year.



Vital to UK infrastructure, connecting Great Britain with Northern Ireland and mainland Europe.



9 ports and 300+ departures every week across 14 vessels

**According to ONB data

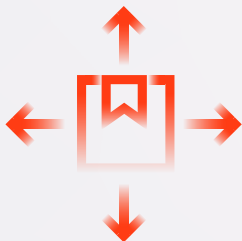
OPERATIONS:
OUR FOOTPRINT IN EUROPE

DP World Europe:
The European Regional Headquarters are at Palace Street,
London, UK.

DP World is delivering more efficient, sustainable, and resilient supply chains that are fit for the future. We’re rapidly transforming and integrating our business pillars – **Ports and Terminals, Logistics, Marine Services, and Technology** – with local expertise to create stronger, more efficient end-to-end supply chain solutions that will change how the world trades.



PORTS AND TERMINALS



LOGISTICS



MARINE SERVICES



TECHNOLOGY

PORTS & TERMINALS: FLOW BETWEEN EUROPE

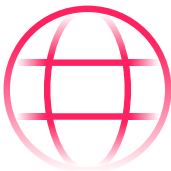
We operate ports and terminals that let the world’s trade flow more freely. Our network across Europe enables goods to seamlessly and securely flow between Europe and the rest of the world.

10 DEEPSEA TERMINALS
(8 COUNTRIES)

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

13 INLAND TERMINALS
(6 COUNTRIES)

- **Belgium:** Liège
- **France:** Huningue, Ile Napoléon, Ottmarsheim
- **Germany:** Germersheim, Mannheim, Stuttgart
- **Romania:** Aiud
- **Serbia:** Novi Sad
- **Switzerland:** Basel – Birsfelden / Frenkendorf / Kleinhüningen & Zurich – Niederglatt



23 locations
in 11 countries



4,000+
employees



\$3bn investment
planned over the
next 3 years

*Joint venture

LOGISTICS: STREAMLINE SUPPLY CHAINS EFFECTIVELY

From freight forwarding to contract logistics, in a world where global supply chains have become more complex and challenging than ever before, we connect and simplify, uniting unbeatable expertise and infrastructure.

We create cutting-edge, proprietary technological solutions to revolutionise how goods and communications flow through every link of the global supply chain, creating stability, security, and profitability for cargo owners.

Our specialist logistics capabilities enable us to provide end-to-end supply chain solutions which help goods flow faster and more reliably to more parts of the world. We have created a global service network providing our customers with more integrated, sustainable, and resilient options, including:

- Contract Logistics
- Freight Management
- Market Access
- Parks & Economic Zones



180+ locations
in 20+ countries



19,000+*
employees

*This employee count includes Freight Europe and Contract Logistics

FREIGHT EUROPE: FLEXIBLE TRANSPORT EUROPE

Our multimodal network of land, air, and sea transport routes within Europe specialises in Automotive, Technology, Chemicals, Retail & Consumer, Engineering and Manufacturing, and Healthcare offering flexible, sustainable solutions to the supply challenges of getting goods into local communities.

As we build our freight forwarding network, we are becoming an orchestrator of international freight to act as the single point of contact for our customers, solving the complex challenges of end-to-end logistics at scale.

We also offer road freight services within P&O Ferrymasters, a 100% owned DP World entity.



80+ Freight Forwarding offices in Europe



4,000+* employees

Specialists in:

- **Automotive**
- **Technology**
- **Chemicals**
- **Retail & Consumer**
- **Engineering & Manufacturing**
- **Healthcare**

*This employee count is included within the overall logistics employee total

CONTRACT LOGISTICS: SEAMLESS CONNECTIVITY FOR ALL

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.

DP World Europe provides a comprehensive suite of industry-specific Contract Logistics solutions for our customers, keeping costs down while putting our customers in control of their supply chains. These value-add solutions include:

- **Manufacturing & Assembly**
- **Export Packaging**
- **Fulfilment & Value-Add**
- **Reverse, Repair & Service Parts**



100+ facilities in 10 countries



15,000+* employees in Europe, bolstering enduring connections



Leaders in complex value chains



3.7km² warehouse space in Europe – equivalent to Central Park in New York City

MARINE SERVICES: EXPAND TRADE ROUTES

Our Marine Services* division offers highly specialised solutions including feeder services and shortsea shipping, ferries and multimodal freight in Europe.

We operate 95 sites in 27 countries in Europe, using multiple brands:

- P&O Ferrymasters
- P&O Ferries
- P&O Maritime Logistics
- Unifeeder Group



95 sites in
27 countries



2,000+
employees

TECHNOLOGY: REVOLUTIONISING GLOBAL TRADE

We are transforming the global supply chain, using cutting-edge technology to improve every aspect of trade and logistics. We know that digitising global trade will create a more efficient, agile and accessible supply chain, and effectively increase economic opportunity for communities and businesses all around the world.

P&O Ferries:

The P&O Ferries Division Holdings Limited headquarters are at Channel House, Dover, Kent, UK.

P&O Ferries are based in 6 countries:
England, Scotland, Northern Ireland, France, Belgium, Netherlands.

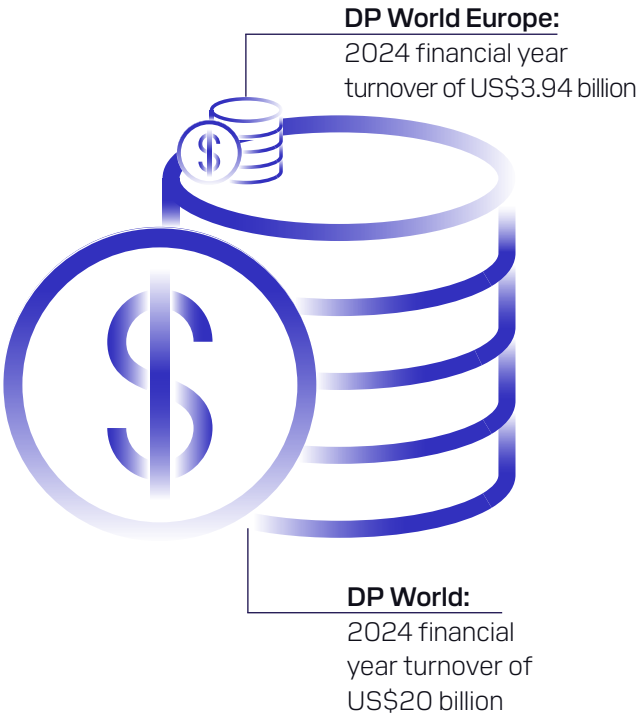
We operate
across 7 Routes
and 9 Ports:



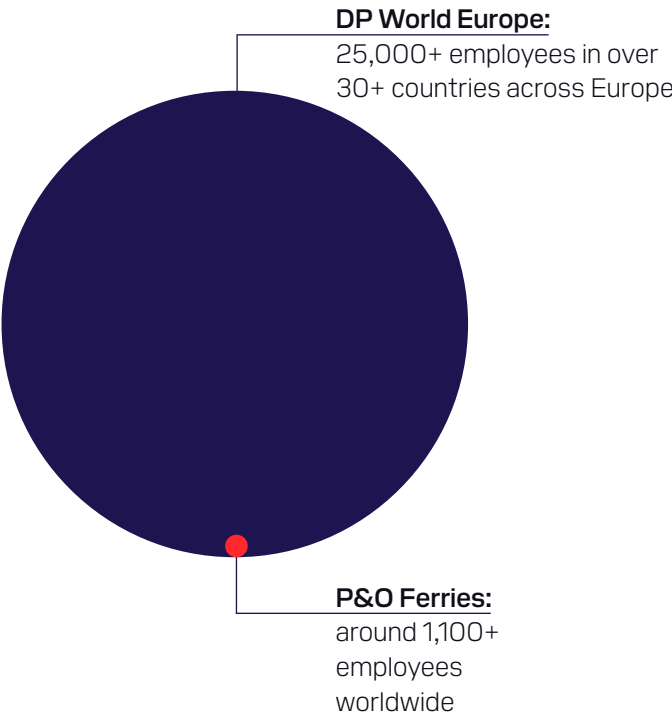
- DOVER – CALAIS
- HULL – EUROPOORT
- TEESPORT – ZEEBRUGGE
- HULL – ZEEBRUGGE
- LARNE – CAIRNRYAN
- TILBURY – ZEEBRUGGE
- TILBURY – EUROPOORT

*Marine Services (other than P&O Ferries Group) have made their own modern slavery statements or are included in the DP World group modern slavery statement. They are referenced in this statement only to illustrate to overall business coverage of the DP World group in Europe. This statement covers only the entities/activities as outlined in this statement, in particular in the notes on page 2.

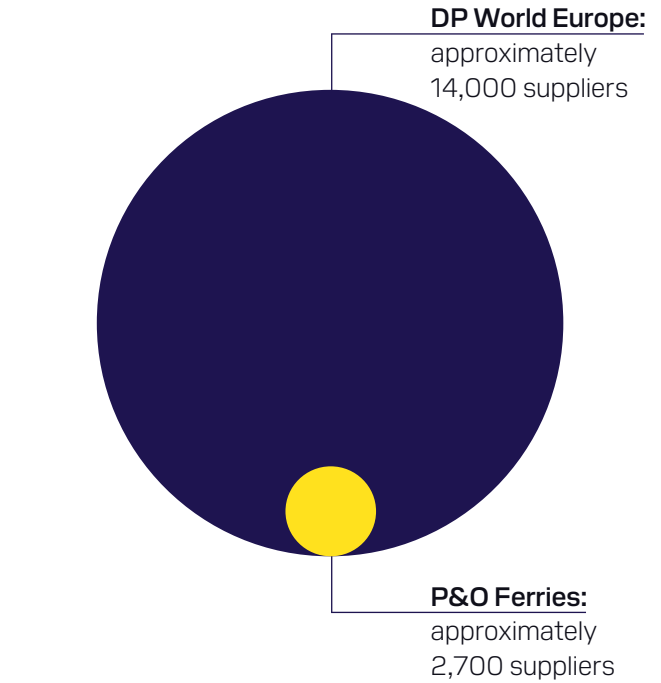
OUR TURNOVER



OUR STAFF



OUR SUPPLIERS



Location of Tier 1 suppliers:

DP World Europe:
Approximately 53% of our Tier 1 suppliers that we have a direct relationship with which equates to roughly 87% of our spend. Approximately **86% of our suppliers** are headquartered in **Germany, United Kingdom, Netherlands, Poland, Belgium, Türkiye and Romania**, of which, **57.6%** are based in both Germany and the UK.

P&O Ferries:
Approximately 92% of our Tier 1 suppliers that we have a direct relationship with are headquartered in the **UK, Netherlands, Ireland, Belgium, France and Germany**, of which, **58%** are based in the UK.

OUR TIER 1 SUPPLIER SOURCING COUNTRIES

BOTH DP WORLD EUROPE AND P&O FERRIES SOURCE FROM SUPPLIERS BASED IN THE FOLLOWING COUNTRIES:			THE REST OF DP WORLD EUROPE SUPPLIERS ARE FROM THE FOLLOWING COUNTRIES:		THE REST OF P&O FERRIES SUPPLIERS ARE FROM THE FOLLOWING COUNTRIES:
AUSTRIA	ISRAEL	TÜRKIYE	AUSTRALIA	REPUBLIC OF KOREA	CAYMAN ISLANDS
BELGIUM	ITALY	UNITED ARAB EMIRATES	BOSNIA AND HERZEGOVINA	ROMANIA	CYPRUS
CANADA	JAPAN	UNITED KINGDOM (CAPTURES GUERNSEY, NORTHERN IRELAND AND ISLE OF MAN)	BULGARIA	RUSSIAN FEDERATION	GIBRALTAR
CHINA (CAPTURES HONG KONG AND TAIWAN)	LITHUANIA	UNITED STATES OF AMERICA	CHILE	SAUDI ARABIA	MONACO
CZECHIA	LUXEMBOURG		CROATIA	SENEGAL	PHILIPPINES
DENMARK	MALTA		CYPRUS	SERBIA	
ESTONIA	MEXICO		HUNGARY	SLOVAKIA	
FINLAND	NETHERLANDS (CAPTURES CURAÇAO)		LATVIA	SLOVENIA	
FRANCE	NORWAY		MONTENEGRO	SOUTH AFRICA	
GERMANY	POLAND		MOROCCO	UKRAINE	
GREECE	SINGAPORE		NEW ZEALAND	URUGUAY	
INDIA	SPAIN		NORTH MACEDONIA		
IRELAND	SWEDEN		PAKISTAN		
	SWITZERLAND		PORTUGAL		

GOVERNANCE

// OUR POLICIES AND PROCEDURES RELEVANT TO SLAVERY AND HUMAN TRAFFICKING

OUR APPROACH

Our commitment to actively combatting and minimising the risk of modern slavery or human trafficking anywhere in our business and supply chains globally is delineated in our suite of Group, Regional and Business Unit Policies.

OUR POLICIES

DP World Europe’s active combatting of modern slavery and human trafficking in our business and supply chains is underpinned by appropriate policies which address issues relevant to slavery and human trafficking and are regularly reviewed and updated to reflect our evolving business.



KEY POLICIES AND PROCEDURES CONCERNING MODERN SLAVERY AND HUMAN TRAFFICKING INCLUDE:

- Group Human Rights Statement**
Establishes the framework for the actions that DP World will implement through its commitment to human rights in accordance with the UN Guiding Principles to identify and address human rights issues, including those related to modern slavery. We understand human rights to be, at a minimum, those outlined in the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.
- Group Modern Slavery and Human Trafficking Statement**
Establishes the framework for the actions that DP World will implement through its commitment to modern slavery and human trafficking.
- Group Sustainability Partnership Policy**
With the launch of the DP World Foundation, 2024 saw a transition around the definition, governance and process of charitable donations and community investment. This policy seeks to outline this new transition of roles and responsibilities and outline specifically the governance and process for Group Sustainability Partnerships going forwards.
- Group Sustainability Policy**
Sets out DP World’s approach to sustainability and its key priorities and focus areas. The policy is aligned with our stakeholder expectations and seeks to strengthen and support our various sustainability initiatives and programmes aligned with our commitment to being a responsible corporate citizen.

- Group Health, Safety & Environment Policy**
Sets out the goals and outlines the commitments of the Group with respect to HSE performance and continual improvement. It is based on caring for our people, environment, communities in which we work and stakeholder partners.
- DP World’s Group Whistleblowing Policy**
Sets out a system in which employees and third parties, including employees from suppliers and vendors, can securely report concerns, suspicions or knowledge of misconduct or unethical behaviour, including any concerning slavery, human trafficking and human rights violations. Reporting parties are protected from retaliation in any form.
- DP World’s Group Procurement Policies and Procedures**
Guides our global business units to manage local supply chains effectively.
- Our Global Code of Ethics**
Underlines our commitment towards human rights, taking into account the ten principles of the UN Global Impact.
- Our Vendor Code of Conduct**
Sets out the standards and behaviours to promote 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.
- DP World Just Transition Statement**
Applies to DP World’s operations globally and seeks to ensure that the substantial benefits of a green economic transition are shared inclusively and equally.

- Company standards, policies and procedures**
Sets out employees’ obligations and the process to report suspected and known incidents of modern slavery and human trafficking, and consequences for failure to report.
- Gender Equality Statement**
Sets out our goals to actively pursue more gender equality in our business.
- Procedures for Community Investment**
Our focus is on strategic community investment at DP World and the requirements and procedures for running community investment projects.



DP World Europe and P&O Ferries supplements the above with the following relevant internal policies, codes and statements that are subject to continuous review and improvement:

DP World Europe:

- **Declaration Of Basic Principles For The Protection Of Human Rights And The Environment** – sets forth DP World Logistics Germany B.V. & Co. KG and its affiliates’ basic principles for the protection of human rights and the environment, in line with the requirements of the German Supply Chain Due Diligence Act.
- Europe Procurement Policy
- Health, Safety, Security & Environment Regional Procedures & Guidelines

P&O Ferries:

- Equality and Diversity Policy
- Modern Slavery & Human Trafficking Policy
- Procurement Policy
- CIPS Code of Conduct
- Code of Ethics
- Our corporate policies and commitments
- P&O Ferries Supplier Code of Conduct
- Modern Slavery & Human Trafficking Statement
- Corporate Social Responsibility at P&O Ferries
- Quality Standards Accessible Travel



DP World Europe and P&O Ferries ensures its policies are readily available to all workers and internal parties via Connections and we regularly review and update our policies accordingly.

P&O Ferries:

At P&O Ferries, we adhere to a RICS (Risk and Internal Controls Standards) mechanism to monitor the compliance with any policies and standards.

Any findings of partial-compliance or non-compliance within an audit or gap analysis require an action plan with the due date being overseen by the control owner.

In terms of oversight, all modern slavery policies are escalated through to our General Counsel to the Board of Directors for approval and awareness.

DUE DILIGENCE
// OUR PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAINS

HUMAN RIGHTS DUE DILIGENCE PROCEDURE

DP World Europe & P&O Ferries, while concurrently reinforcing expectations through codes of conduct, are currently reviewing all due diligence processes to strengthen their ability to effectively identify, assess, manage, and monitor the risks of modern slavery and human trafficking across key stages, including:

- Risk identification and scoping (initial screening)
- Impact assessment and prioritisation (materiality analysis)
- Integration and action planning (risk management integration)
- Tracking and monitoring (performance measurement)
- Communication and disclosure (stakeholder transparency)
- Grievance mechanisms and remediation (accountability and remedy)

SCREENING & ASSESSMENT:
Prospective suppliers are required to adhere to the various Vendor Codes of Conduct designed to set the guidelines of how DP World and P&O Ferries expects its suppliers to behave when doing business. It covers things like 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. To illustrate the importance we place on anti-slavery and human trafficking laws, we intentionally include a specific provision whereby compliance is required in many of our supplier contracts (following a risk-based approach).

WHISTLEBLOWING:
Any violations can be reported online or by phone through a dedicated 24-7 DP World Global Whistleblowing hotline service, which is operated for DP World by Navex. DP World’s various speak up channels allow for concerns to be raised anonymously, where permitted by law.

HIGHLIGHTS	STRUCTURE	GOVERNANCE	DUE DILIGENCE	RISK ASSESSMENT	EFFECTIVENESS	TRAINING	OUR FUTURE PLANS
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P&O Ferries:

ENGAGEMENT WITH EXPERTS:

To support their understanding of the local context in which they operate, P&O Ferries regularly engages with the British Ports Association’s Procurement Group through both online and in-person meetings.

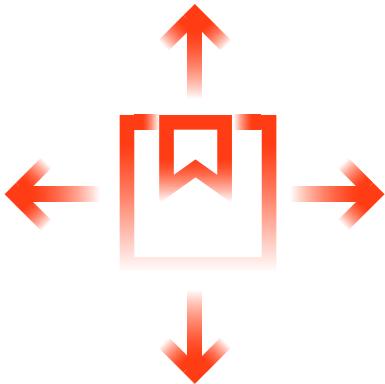
In addition, they actively collaborate with key trade unions:

- **France** CGT: Confédération Générale du Travail and CFDT: Confédération Française Démocratique du Travail. A dedicated works council convenes monthly to address and respond to all labour-related matters, ensuring ongoing dialogue and responsiveness to employee concerns.
- **UK & Ireland** have regular consultation with 2 UK Unions: GMB for Dover Port and Channel House where they have 2 workplace reps. UNITE for Hull, Larne, Larne Harbour and Cairnryan where they have approximately 6 workplace reps.
- **Netherlands and Belgium** **Europoort & Zeebrugge** work with a Dutch work counsel who has the right of advisory and consent – with 9 representatives from their quay, office and seafarers. With the CBA negotiations, there are 2-4 representatives from every CBA.

Furthermore, a separate Health & Safety Works Council meets quarterly to review and manage workplace safety issues. P&O Ferries is also required to hold mandatory meetings with trade union representatives concerning payroll matters, which typically take place during the first quarter of each year.

HIGHLIGHTS	STRUCTURE	GOVERNANCE	DUE DILIGENCE	RISK ASSESSMENT	EFFECTIVENESS	TRAINING	OUR FUTURE PLANS
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RISK ASSESSMENT
// AREAS OF OUR BUSINESS AND SUPPLY CHAINS WHERE THERE IS A RISK TO SLAVERY AND HUMAN TRAFFICKING TAKING PLACE, AND THE STEPS WE’VE TAKEN TO ASSESS AND MANAGE THAT RISK



POTENTIAL HUMAN RIGHTS RISKS IN TRANSPORTATION AND LOGISTICS

Transportation and logistics (T&L) are essential to the modern economy, with nearly all businesses relying on outsourced services for product delivery. This dependence has raised challenges in ensuring workers’ human rights across the supply chain.

Our approach to risk in our supply chain continues to evolve. In the coming years, we expect to increase reporting on risk as part of our ongoing commitment to identify and mitigate slavery and human trafficking within our business operations and supply chain.

This primer* highlights the 10 most relevant, urgent, and potential human rights impacts anticipated in relation to T&L operations:

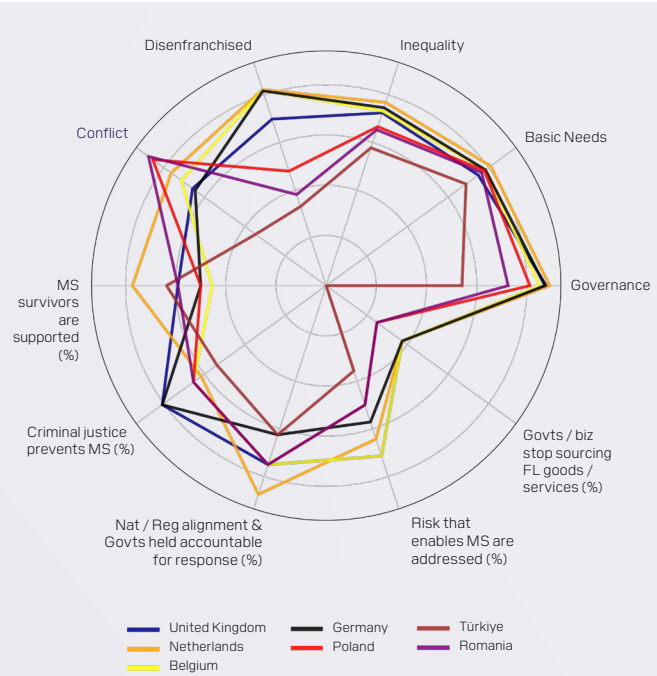
1. OCCUPATIONAL HEALTH & SAFETY
 2. FAIR WORKING CONDITIONS
 3. FORCED LABOUR, HUMAN TRAFFICKING & MODERN SLAVERY
 4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING
 5. WORKPLACE DISCRIMINATION
 6. LAND ACQUISITION AND INDIGENOUS RIGHTS
 7. GRIEVANCE MECHANISMS AND ACCESS TO REMEDY
 8. EMISSIONS AND ENVIRONMENTAL POLLUTION
 9. JUST TRANSITION
 10. BRIBERY & CORRUPTION

*Produced by BSR in May 2024

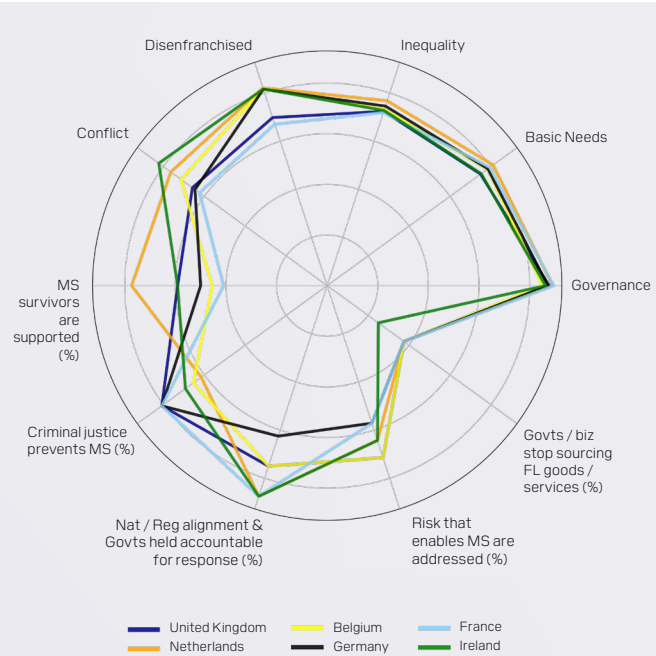
HIGHLIGHTS	STRUCTURE	GOVERNANCE	DUE DILIGENCE	RISK ASSESSMENT	EFFECTIVENESS	TRAINING	OUR FUTURE PLANS
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DP World Europe have conducted the following profile assessments to measure and identify areas where there is potential or indirect risk for modern slavery and human trafficking from all sourcing countries.

These profiles map a number of modern slavery drivers: rule of law and resilience to corruption; labour rights; government efforts to combat human trafficking; gender equality; protection of children from exploitation; and health and standard of living.



DP World Europe: This table is an estimated snapshot of 53% of DP World Europe’s Tier 1 suppliers for the three components of the global slavery index: slavery prevalence, vulnerability and government response.



P&O Ferries: This table is an estimated snapshot of 92% of P&O Ferries Tier 1 suppliers for the three components of the global slavery index: slavery prevalence, vulnerability and government response.

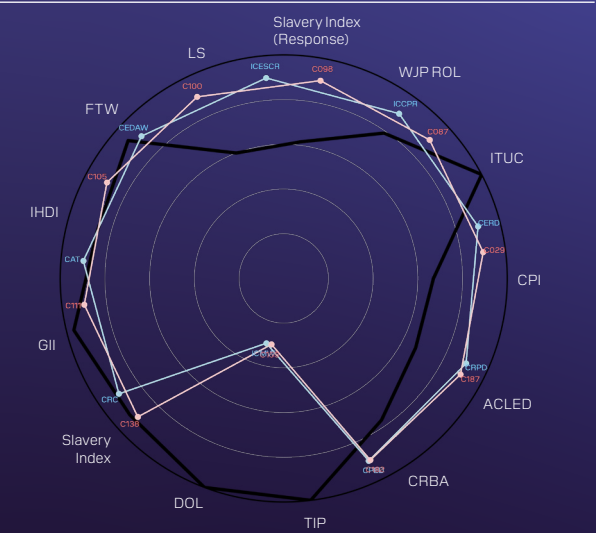
THE RADAR CHARTS ON THE FOLLOWING PAGES REFERENCE THESE GLOBAL DATA SOURCES:

- THE GLOBAL SLAVERY INDEX – PREVALENCE, VULNERABILITY & GOVERNMENT RESPONSE
- WORLD JUSTICE PROJECT RULE OF LAW INDICATORS (WJP ROL)
- ITUC GLOBAL RIGHTS (ITUC)
- TRANSPARENCY INTERNATIONAL’S CORRUPTION INDEX (CPI)
- ARMED CONFLICT LOCATION & EVENT DATA PROJECT CONFLICT SEVERITY INDEX (ACLED)
- UNICEF AND GLOBAL CHILD FORUM – CHILDREN’S RIGHTS AND BUSINESS ATLAS (CRBA)
- TRAFFICKING IN PERSONS REPORT (TIP)
- US DOL LIST – LISTING GOODS PRODUCED BY CHILD OR FORCED LABOUR (DOL)
- GENDER INEQUALITY INDEX (GII)
- INEQUALITY-ADJUSTED HUMAN DEVELOPMENT INDEX (IHDI)
- FREEDOM HOUSE: COUNTRIES AND TERRITORIES | FREEDOM HOUSE FOCUSING ON THE FREEDOM IN THE WORD SCORE (FTW)
- SEDEX – COUNTRY RISK SCORE FOR LABOUR STANDARDS (LS)
- RATIFICATION OF INTERNATIONAL HUMAN RIGHTS TREATIES PER COUNTRY
- RATIFICATION OF FUNDAMENTAL ILO CONVENTIONS PER COUNTRY

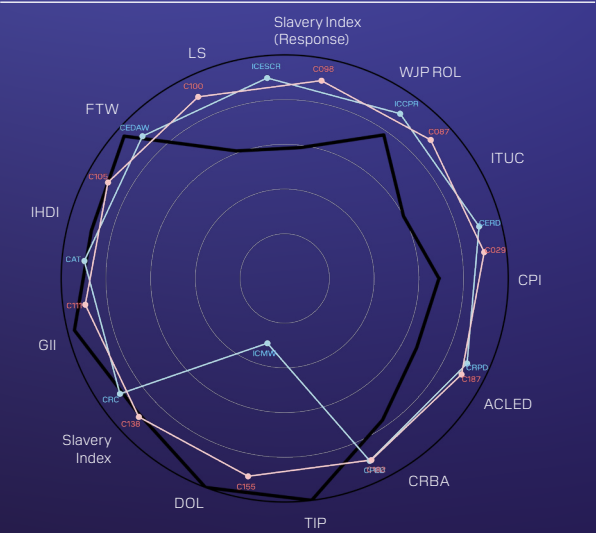
The below radar charts provide a snapshot of 14 risk profiles for Tier 1 sourcing countries, using modern slavery analysis. They show that the closer a data point or line is to the centre of the chart, the lower that country has scored on the corresponding dataset.

DP World Europe and P&O Ferries:

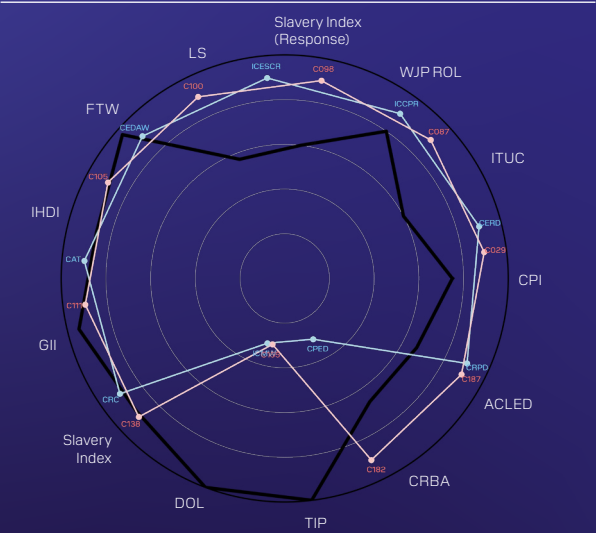
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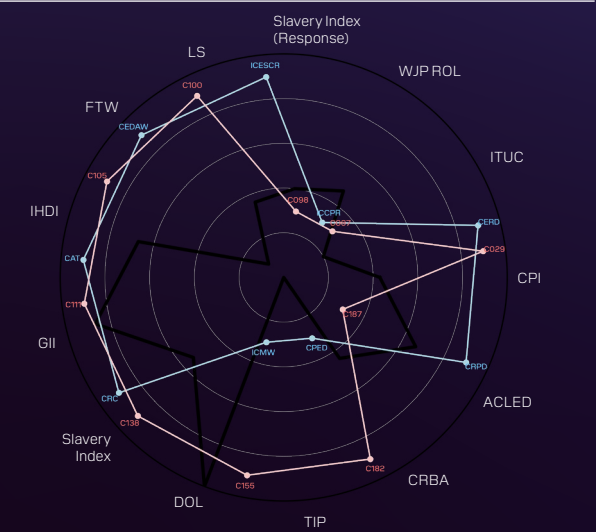
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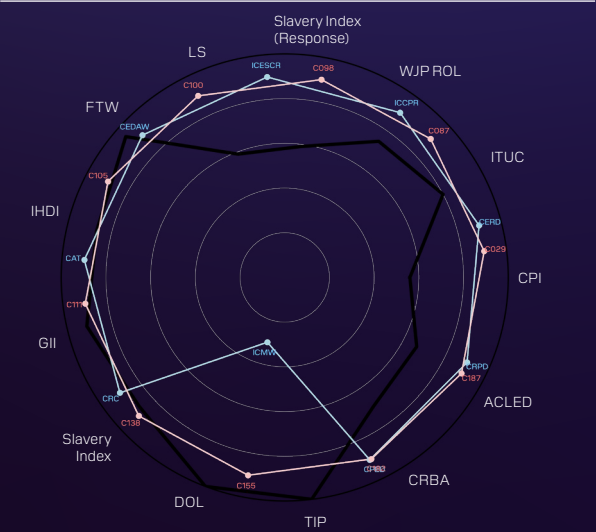
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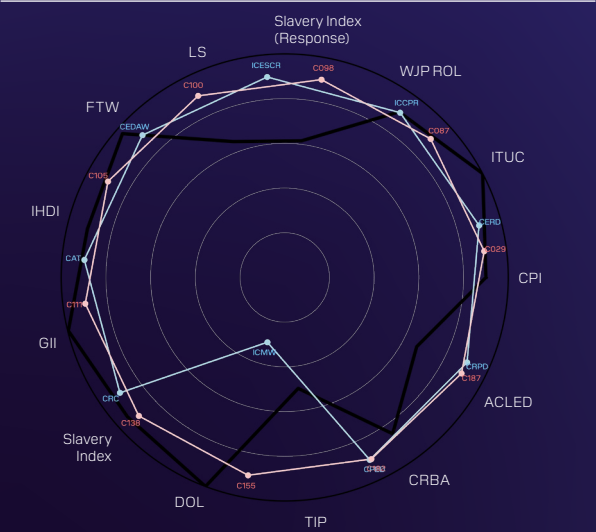
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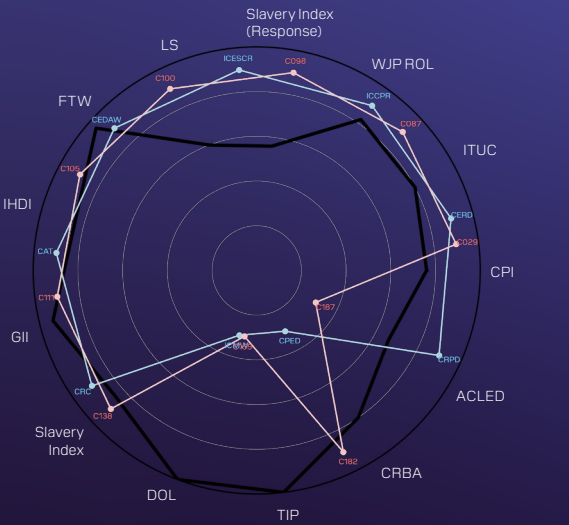
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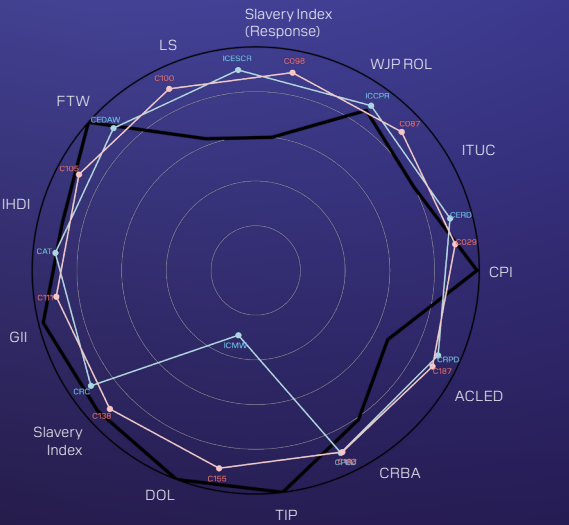
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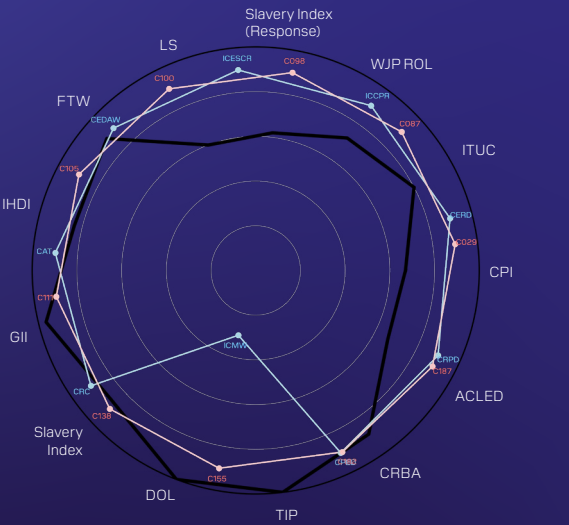
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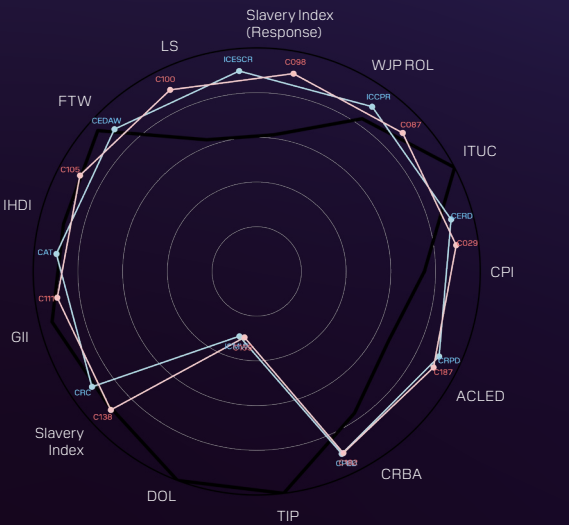
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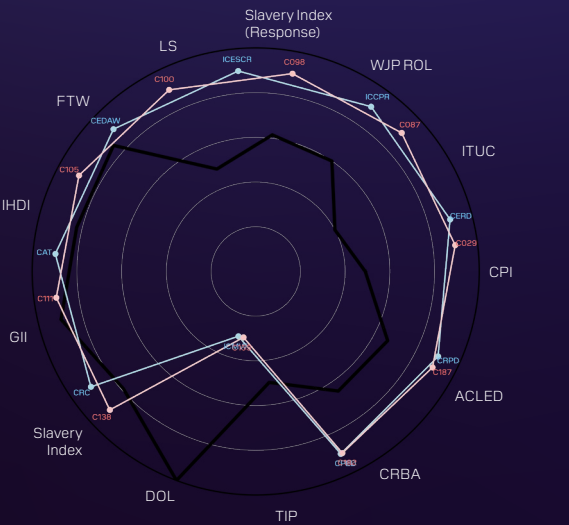
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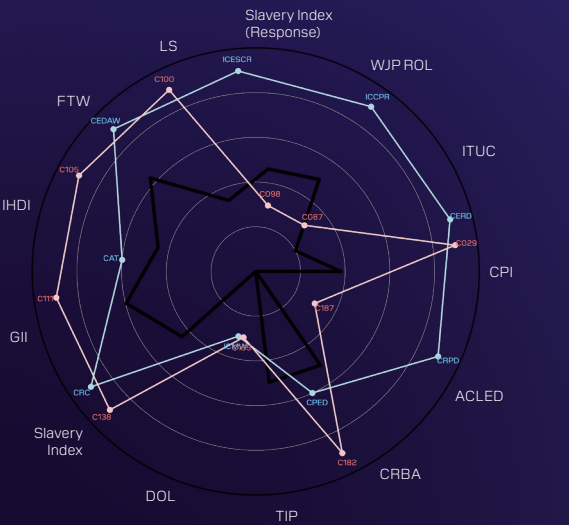
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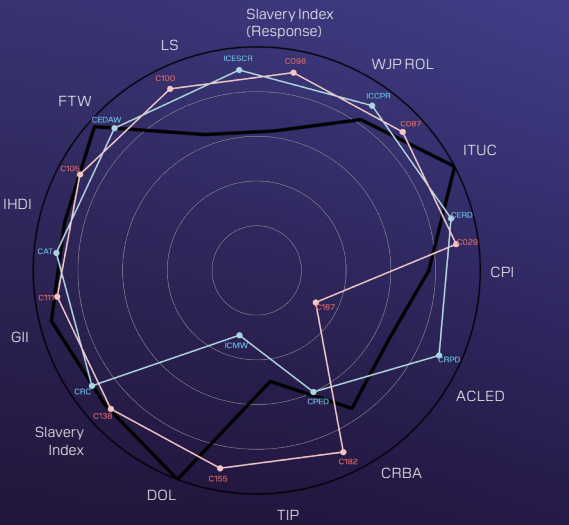
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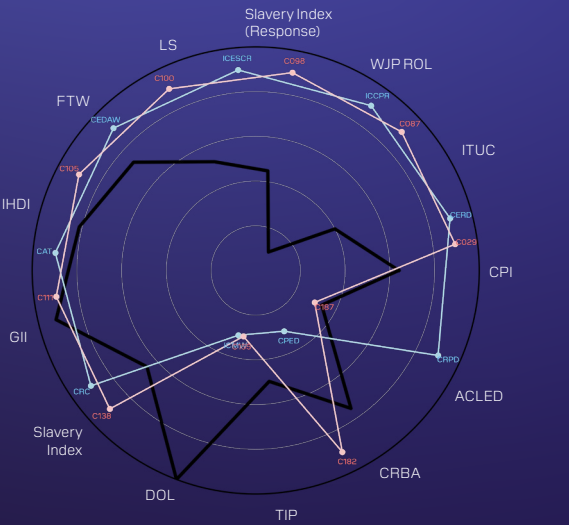
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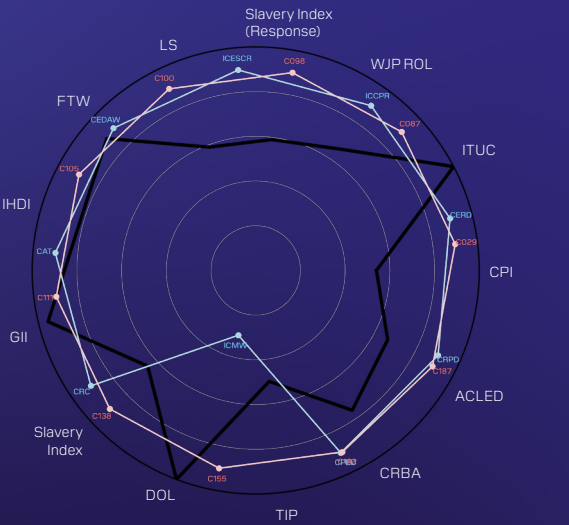
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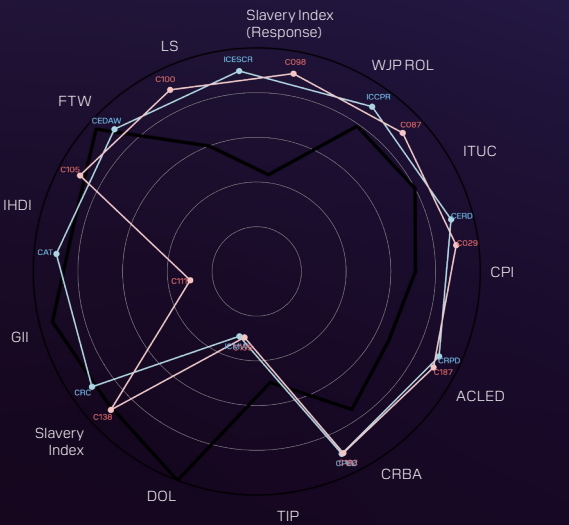
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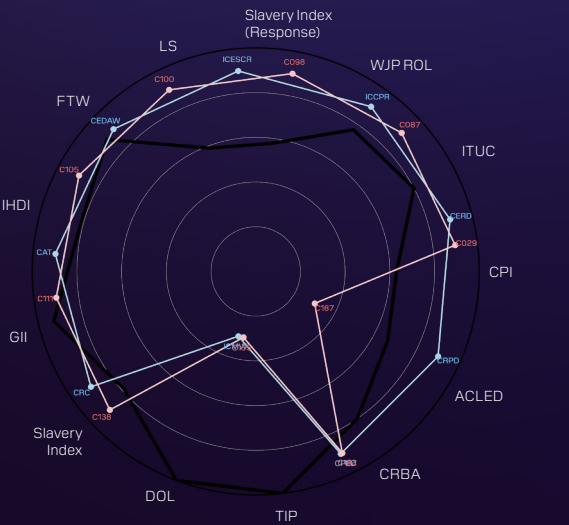
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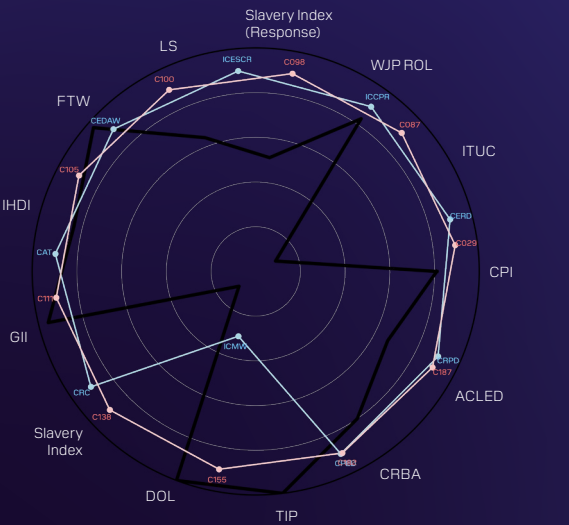
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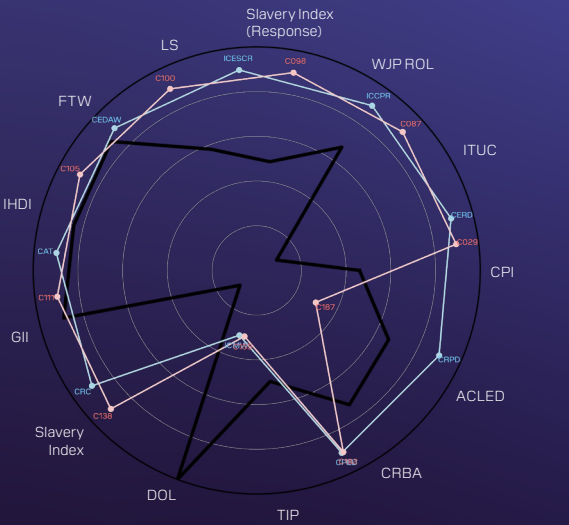
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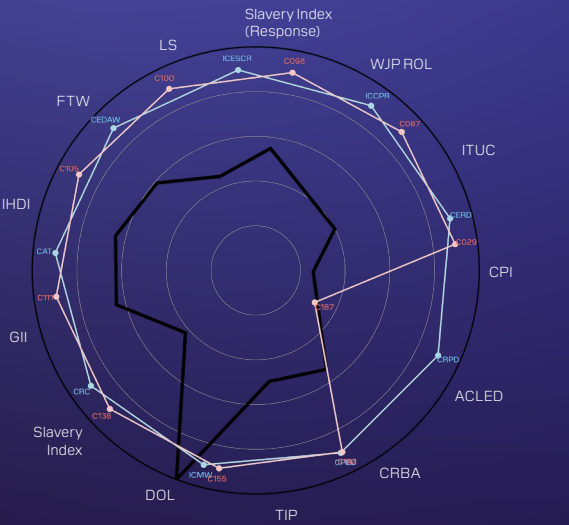
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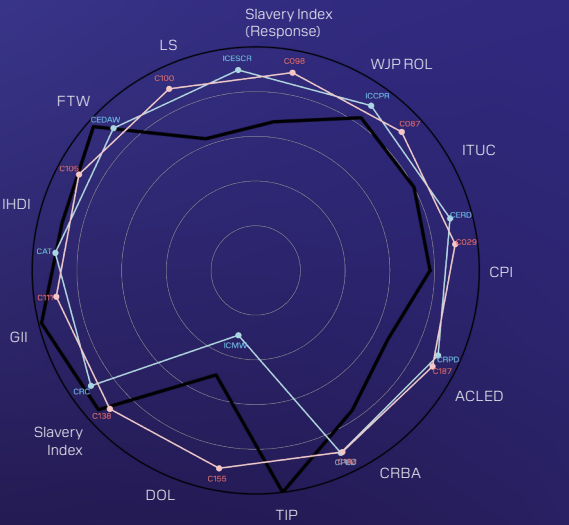
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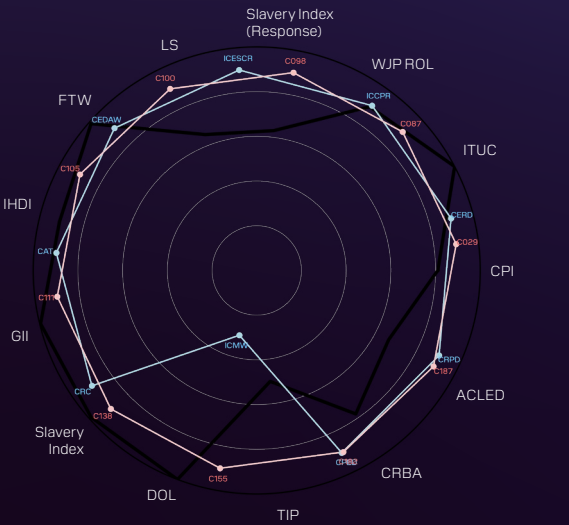
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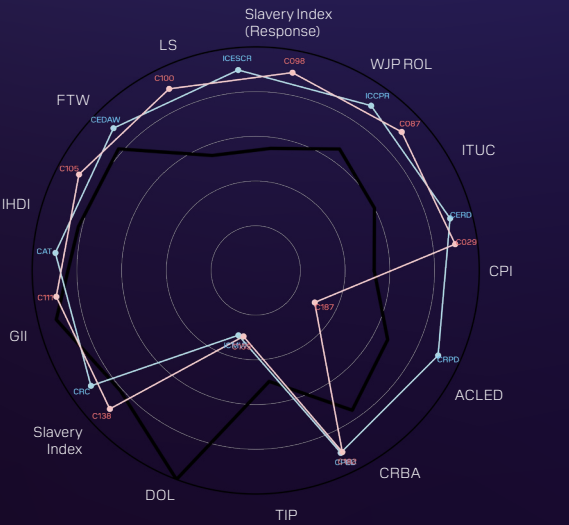
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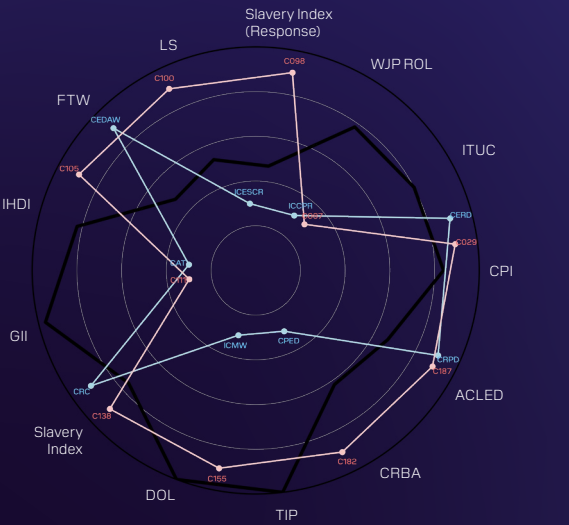
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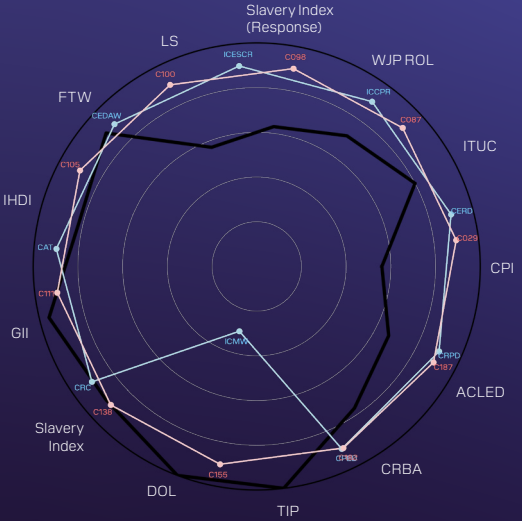
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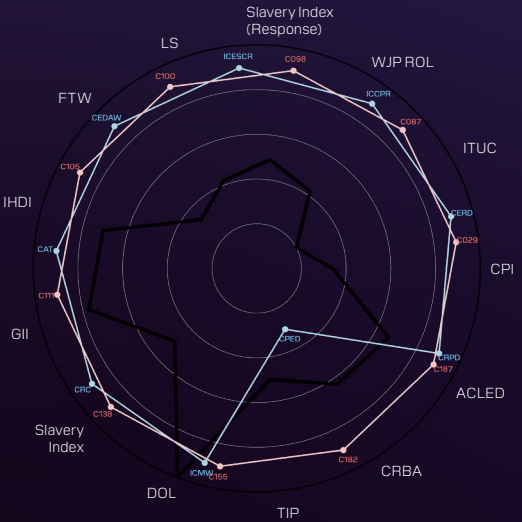
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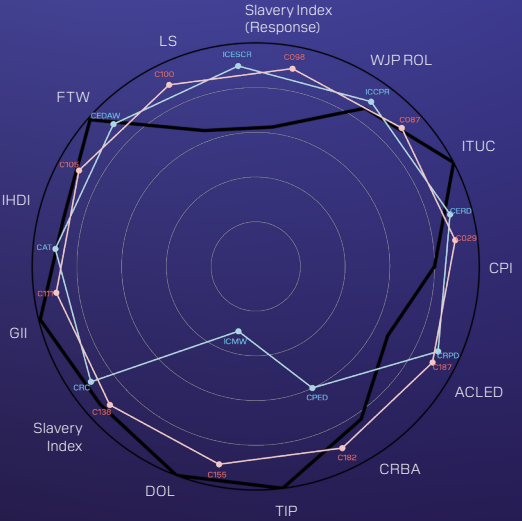
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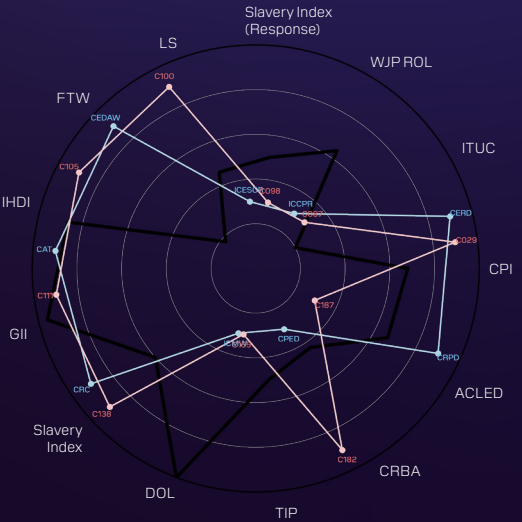
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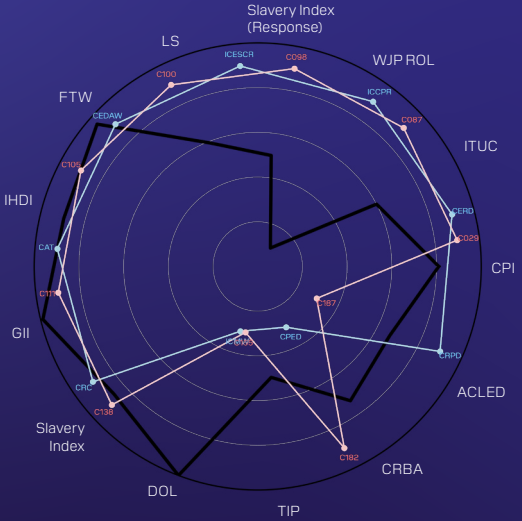
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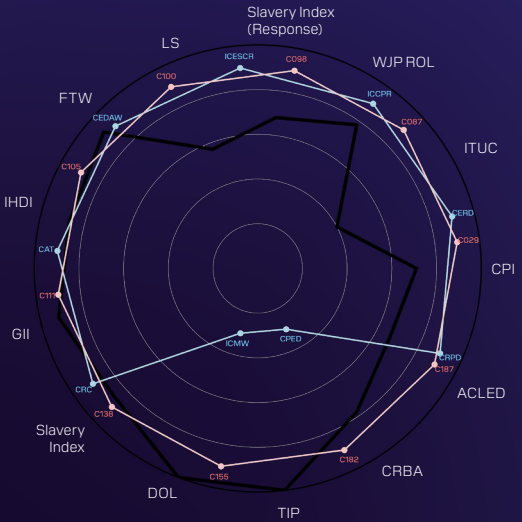
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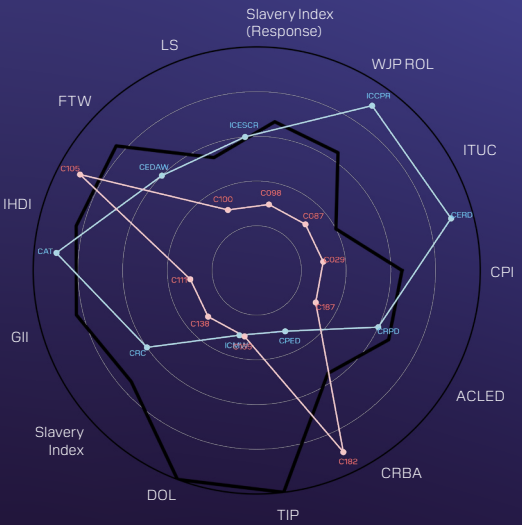
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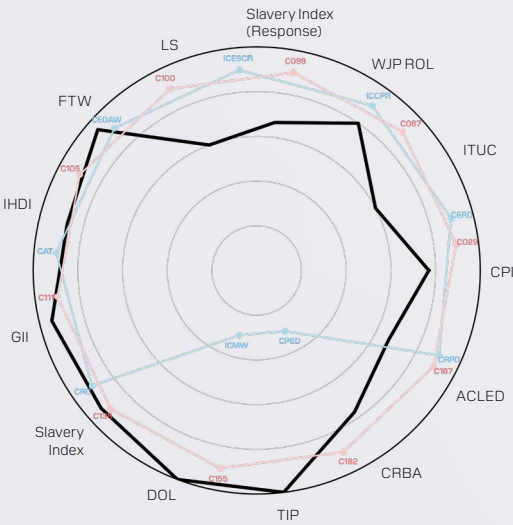


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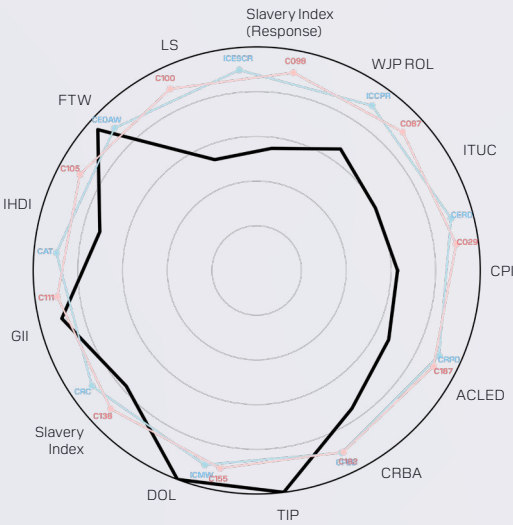


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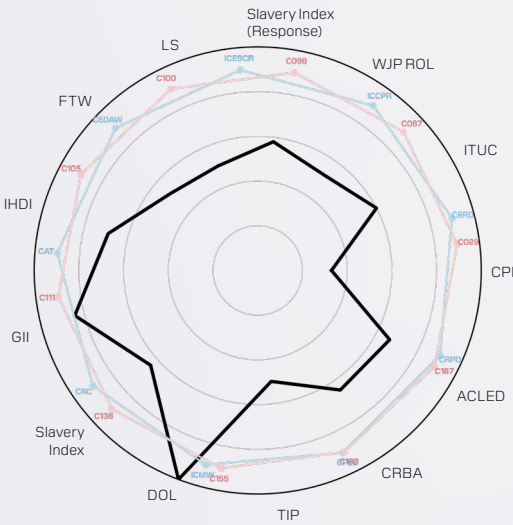
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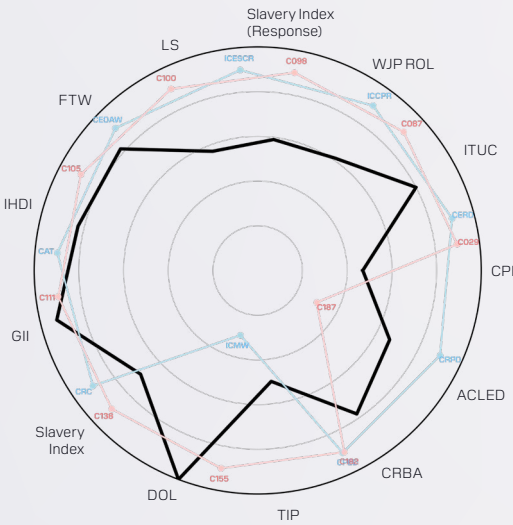
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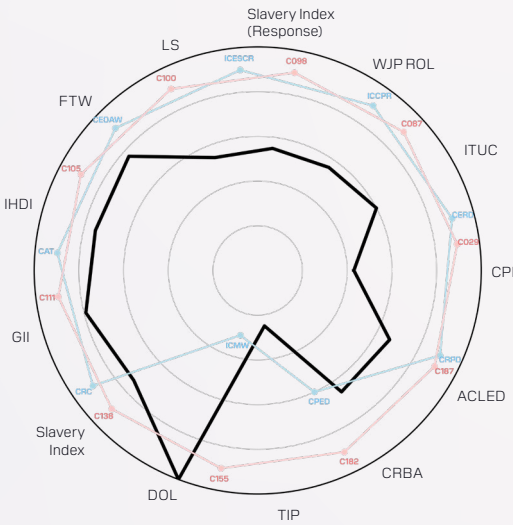
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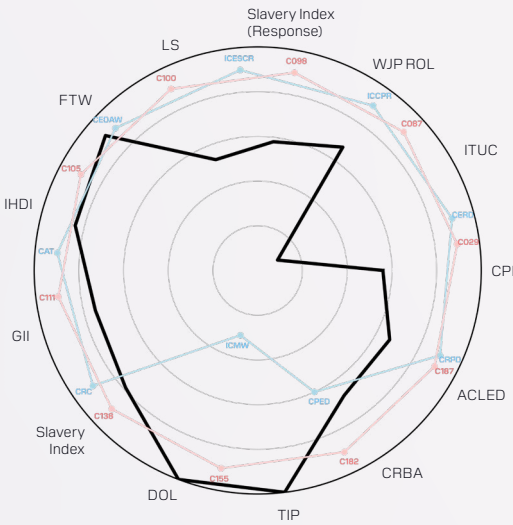
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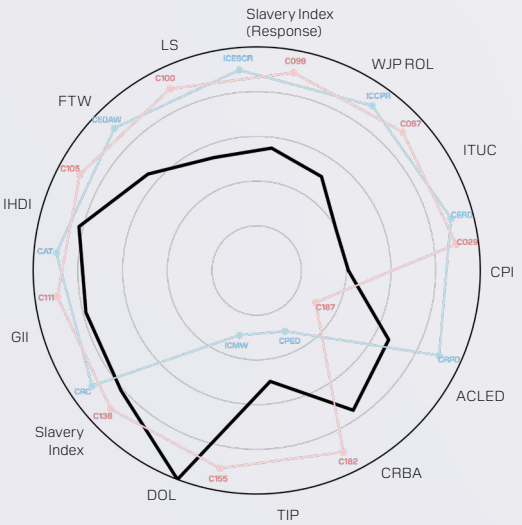
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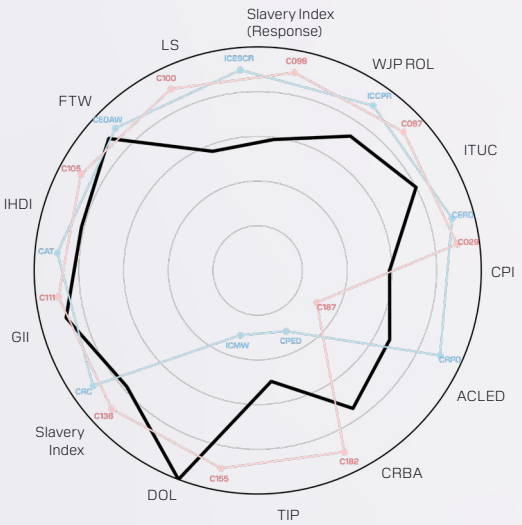
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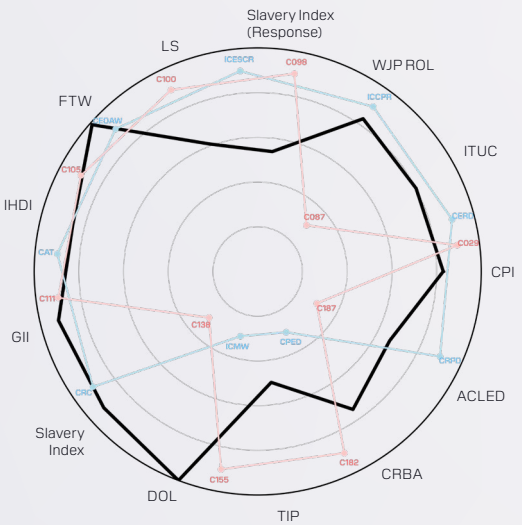
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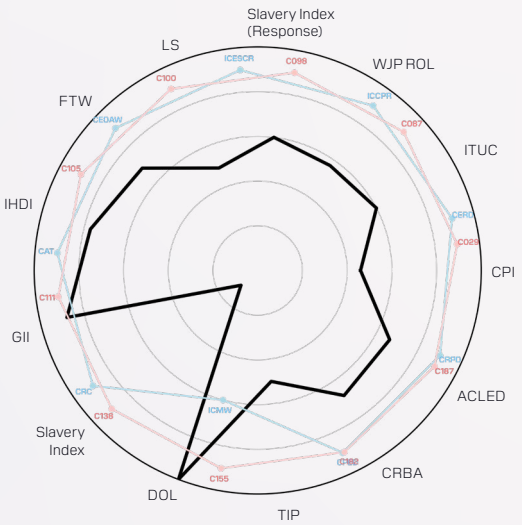
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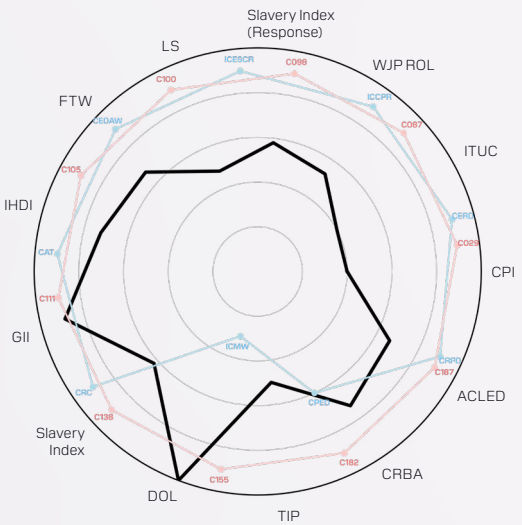
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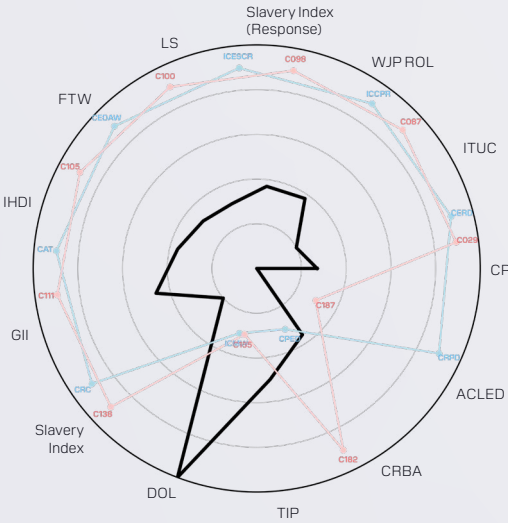
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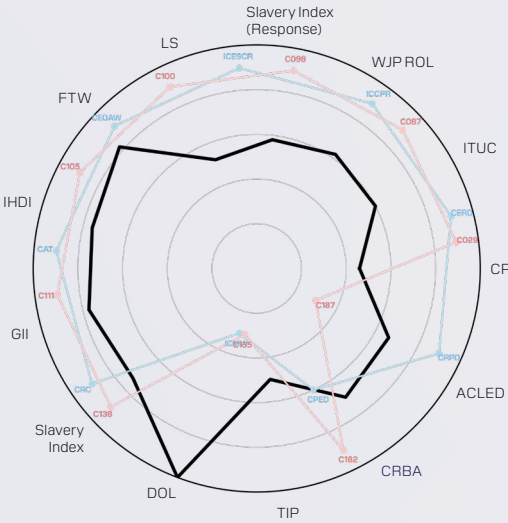
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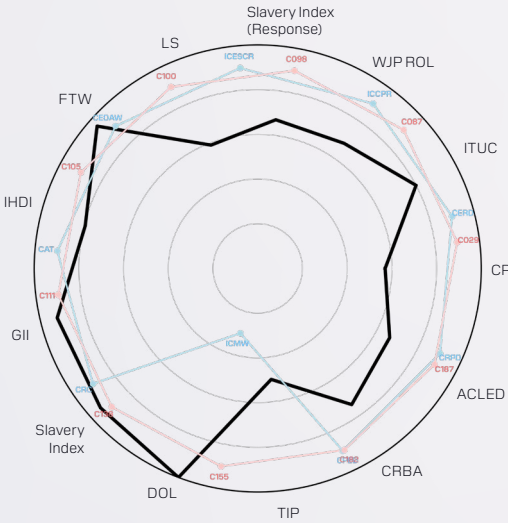
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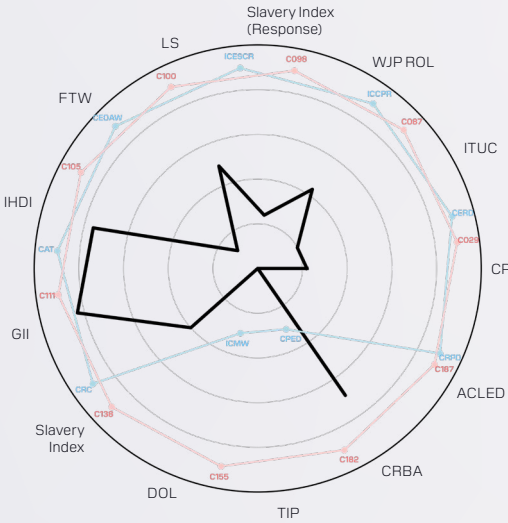
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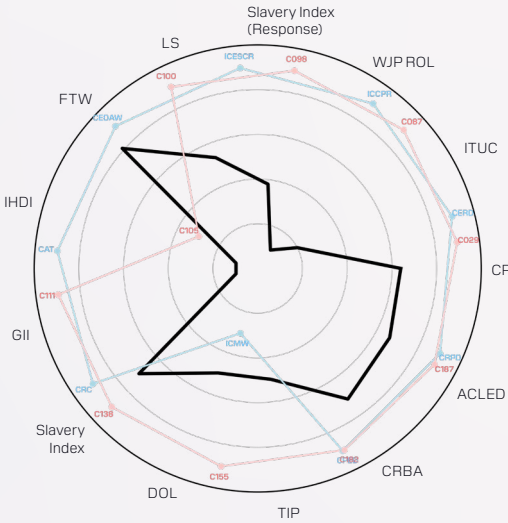
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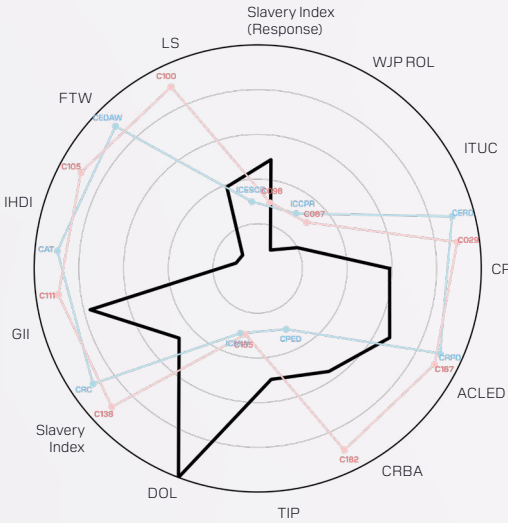
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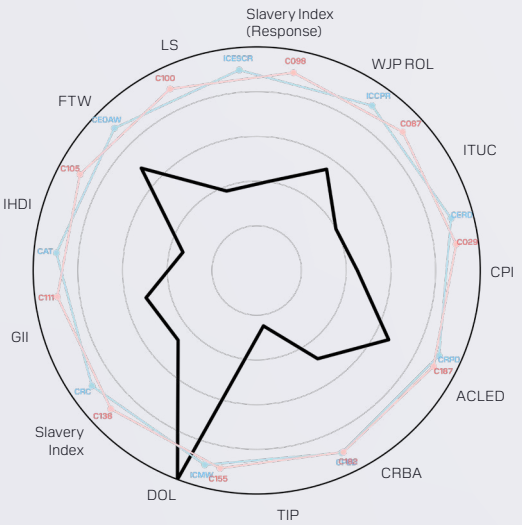
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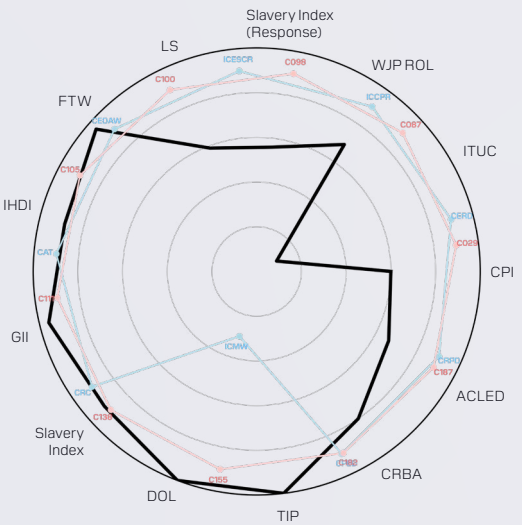
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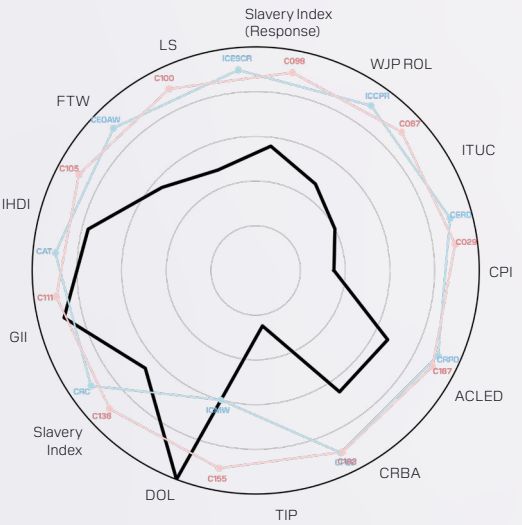
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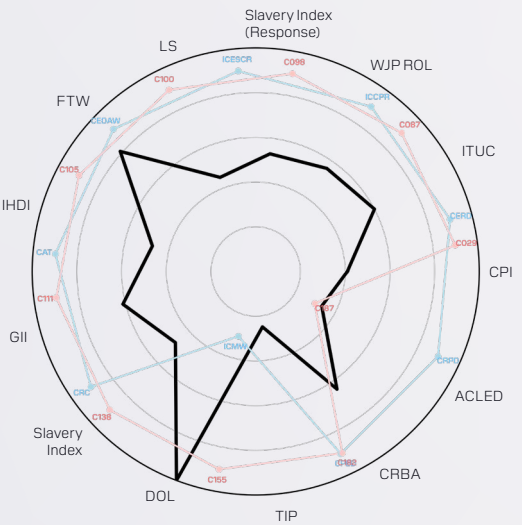
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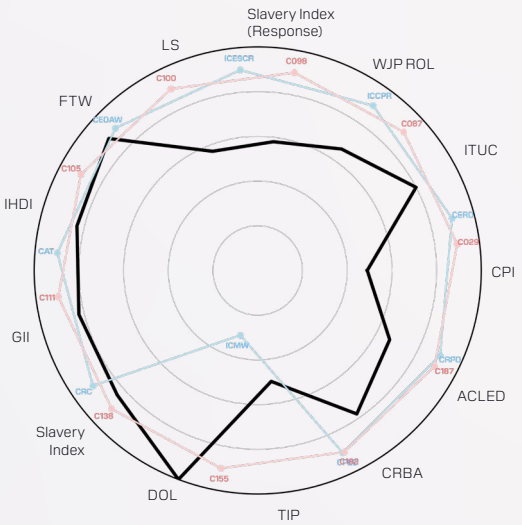
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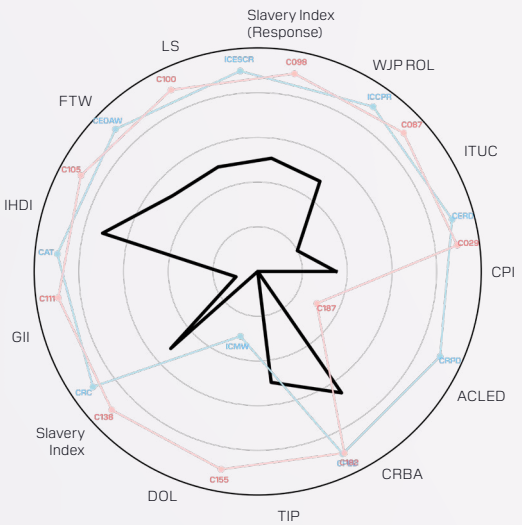
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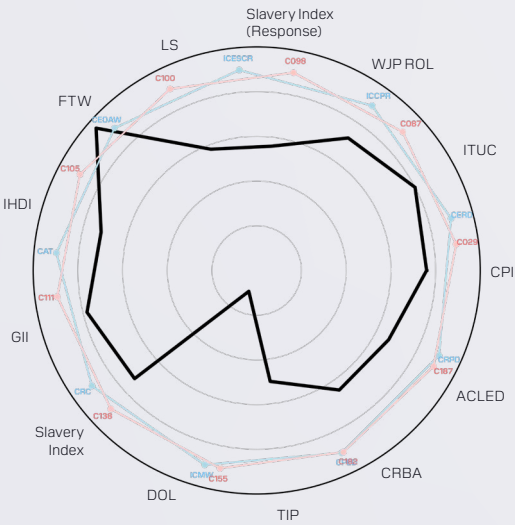
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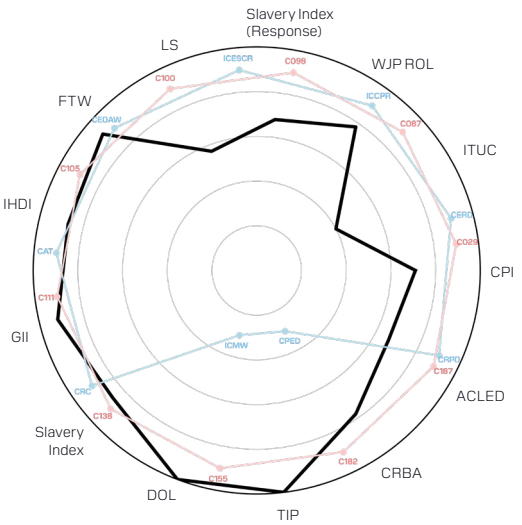


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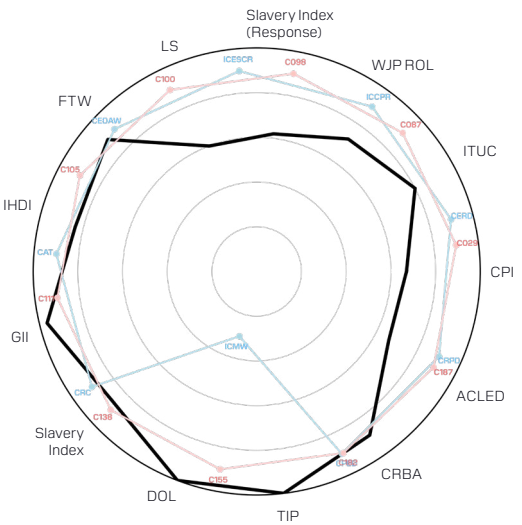


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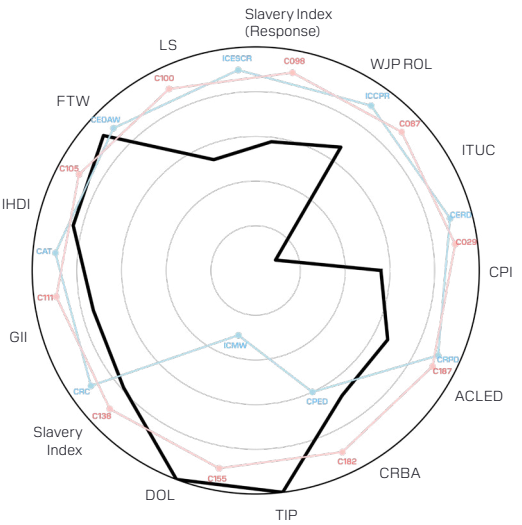
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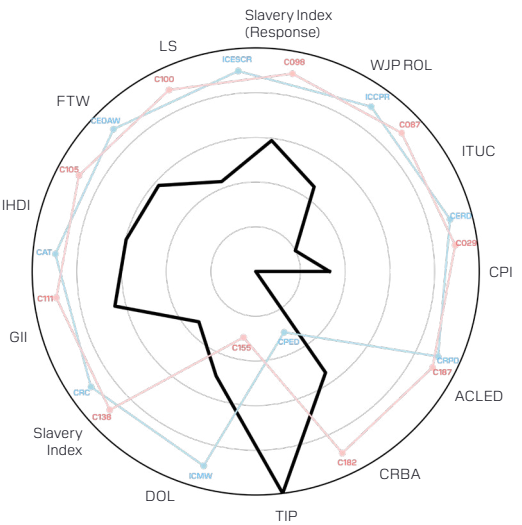
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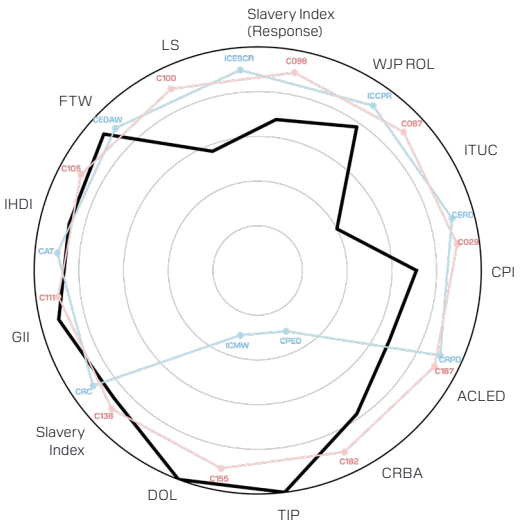
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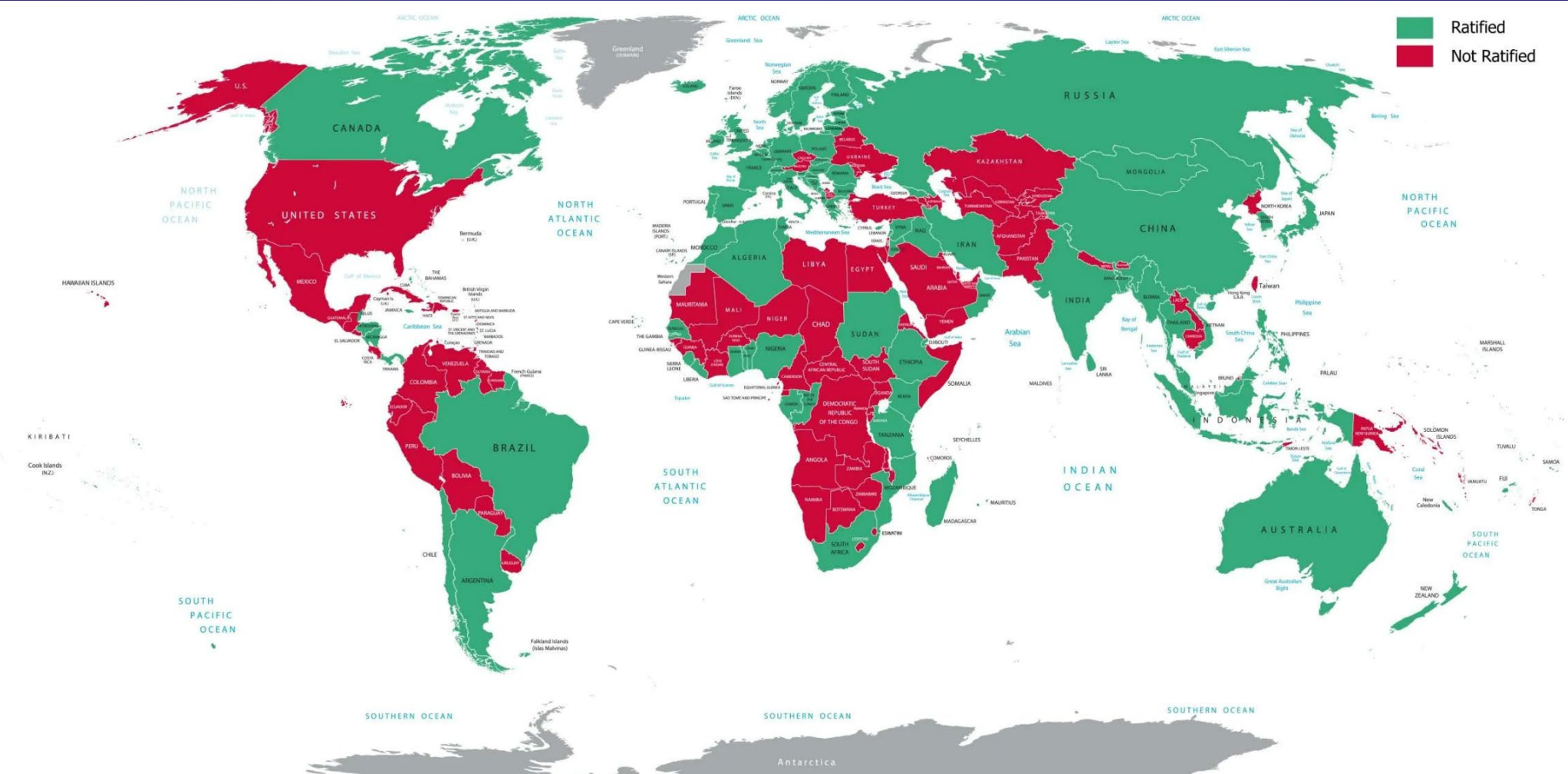


GIBRALTAR



The map below shows the countries which have ratified the Maritime Labour Convention (MLC) as of 1 March 2024.

The ratifications cover over 96% of the world’s gross tonnage. But ratifications and world tonnage coverage do not equate to effective implementation and enforcement. The MLC is critical because it helps DP World Europe identify potential modern slavery risks in shipping by setting enforceable standards for seafarers’ working conditions, a sector highly prone to forced labour and exploitation.



Map source: Seafarers’ Rights International

IDENTIFIED RISKS – TRANSMIGRANTS

The carriage of illegal immigrants into the UK is an identified risk that P&O Ferries monitors.

In 2024, a total of 37 transmigrants (including children) were located either on ships and/or in ports in the UK and Ireland. Approximately 38% were reported in January alone.

Outside the UK, 53 transmigrants were detained in Belgium at the terminal or in a freight unit by security or police.

A further 105 transmigrants were reported to police or deterred in 2024.

This does not reflect the number apprehended before they reach the ships or undetected. In addition to those found on board, our ships are passing migrant boats daily.

The majority are transitioning inbound to the UK with a small number transitioning into Europe. Zeebrugge in Belgium is a well-known area where there are frequent attempts by large numbers to gain access to the port.



IDENTIFIED SALIENT RISK & PRIORITY AREAS FOR ACTION:

- RECRUITMENT PRACTICES
- CASUAL LABOUR ON VESSELS
- FUEL SUPPLY CHAINS
- SHIPBREAKING AND END-OF-LIFE VESSEL DISPOSAL
- HUMAN TRAFFICKING WITHIN EU PORTS

External Expertise & Collaboration:

P&O Ferries has worked to establish collaboration with both UK Border Force and the Port of Antwerp Bruges central control room. These partnerships have been instrumental in the reduction of transmigrant activity and thereby helping to mitigate the risk of human trafficking, modern slavery, and associated human rights violations.

EFFECTIVENESS
// IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN OUR BUSINESS OR
SUPPLY CHAINS, MEASURES AGAINST SUCH PERFORMANCE INDICATORS AS WE CONSIDER APPROPRIATE

OUR PROGRESS OVER THE LAST YEAR

DP World Europe and P&O Ferries:

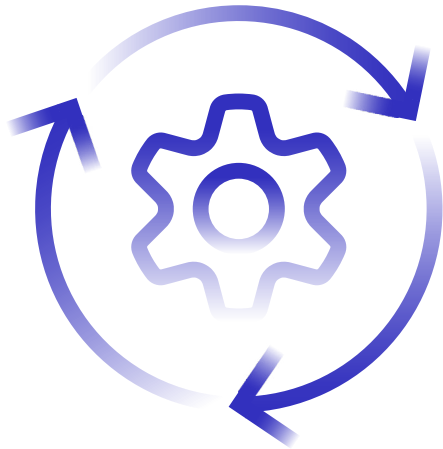
- Conducted the Group Risk and Internal Controls Standards (RICS) assessment to assess control implementation and effectiveness.
- Actively collaborated and engaged with external organisations, stakeholders, international business associations and bodies to address and advance efforts against modern slavery.

DP World Europe:

- Appointed a Director of Modern Slavery and Human Rights to bring focused leadership and expertise to this critical area. The role has been specifically created to design, implement, and oversee comprehensive human rights due diligence protocols within our value chain for DP World Europe.
- Initiated a salient risk assessment of our value chain to identify our key human rights issues, which will serve as the foundation for ongoing risk analysis and inform our broader due diligence activities.

P&O Ferries:

- In 2024, no whistleblower reports were received concerning modern slavery or human trafficking.
- We have invested in thermal cameras on our vessels to try and avoid any collision with small unlit crafts.
- Updated and revised our Modern Slavery and Human Trafficking Policy to include updates on identification of risks of modern slavery in practice, contractual obligations and due diligence requirements and training.



HIGHLIGHTS	STRUCTURE	GOVERNANCE	DUE DILIGENCE	RISK ASSESSMENT	EFFECTIVENESS	TRAINING	OUR FUTURE PLANS
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TRAINING

// INFORMATION ABOUT MODERN SLAVERY TRAINING PROVIDED TO OUR STAFF AND SUPPLIERS

HOW WE RAISE AWARENESS

EMPLOYEES

In 2024, 618 employees were invited to complete DP World Group’s single online modern slavery training module, with an approximate completion rate of 33%.

Of this, 88.78% successfully completed this module in the 2024 reporting year. Further breakdown is as follows:

EMPLOYEE ROLE CATEGORY:

White Collar (127)
61.95%

Blue Collar (39)
19.02%

Not categorised (38)
18.54%

Grey Collar (1)
0.49%



DP WORLD EUROPE OPERATIONAL COUNTRY PER BUSINESS ENTITY:

PORTS & TERMINALS (154) 62.63%
ROMANIA (57)



UNITED KINGDOM (44)



GERMANY (16)



SERBIA (14)



TÜRKIYE (8)



CYPRUS (5)



UKRAINE (5)



BELGIUM (3)



NETHERLANDS (2)



P&O FERRIES (39) 15.85%
UNITED KINGDOM (39)



SYNCREON (9)* 3.66%
HUNGARY (6)



UNITED KINGDOM (3)



IMPERIAL LOGISTICS LTD (44) 17.86%
UNITED KINGDOM (44)



*syncreon is a US-based global logistics provider that specialises in the design and operation of complex supply chains for the high growth automotive and technology industries

SUPPLIERS

DP World Europe and P&O Ferries encourages its suppliers to develop training programmes for both managers and workers to effectively implement its policies, procedures, and improvement goals, as well as to comply with relevant legal and regulatory requirements. This includes providing training on modern slavery.

TRAINING PLANS

Additional work will include human rights, modern slavery and wildlife trafficking within a sustainable, ethical business context.

In 2025, DP World Europe will maintain its internal awareness campaign on human rights due diligence, incorporating modern slavery. This initiative will consist of briefings, face-to-face meetings with key personnel, departmental team training, and tailored advanced training for specific departments focused on the modern slavery risks they may face.

P&O Ferries:

Due to new e-learning platform ‘Onelearn’, P&O Ferries plans to roll out a modern slavery and human trafficking training module for all staff. This is key as Head Office employees regularly visit ports and vessels. Therefore training is not specific to one group.

The current format in which training is provided is via an e-learning module. This e-learning module includes the use of text, audio, visuals and an end of module exam to ensure understanding.

Furthermore, to highlight the slavery risks anticipated, the P&O Ferries training highlights red flags for staff to attain awareness, and also informs staff on what action to take if any suspicion of modern slavery and human trafficking arises.



OUR FUTURE PLANS
// WHAT WE AIM TO DEVELOP OVER THE NEXT YEAR

WHERE WE ARE GOING

We continue to develop and evaluate robust systems and processes that include and address our own business operations in the UK and Europe, and our global supplier base in a number of countries across the globe.

We are wholly supportive of transparency regarding the reporting of instances of modern slavery.

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



- Completion of the **Human Rights, Modern Slavery and Wildlife Trafficking Programme**, Implementation Prioritisation Plan with associated KPIs.
- Completion of **Governance Gap Analysis and Salient Risk Assessment** for DP World Europe.
- Establish a multi-year **partnership with a Civil Society Organisation (CSO)** to combat trafficking, slavery, forced labour and smuggling within our business value chain with a focus on UK and Europe.
- Creation of a **London Gateway Park (LGP) Modern Slavery & Wildlife Trafficking Plan and Annual Report** with a focus on immediate and long term activities.
- Establishment of a **Regional Human Rights Working Group**.
- Appoint a **Community Investment Manager for Europe** to ensure local insights and stakeholder engagement are integrated into human rights due diligence, helping to identify and mitigate community-level risks effectively.
- Appoint a **Volunteering Manager for Europe** to ensure that employee volunteering aligns with human rights due diligence goals, creating meaningful impact while avoiding unintended harm to communities.
- Appoint **Human Rights Protection Officers** in all countries that require one to ensure dedicated oversight of human rights risks across operations, enable proactive identification, mitigation, and response in line with due diligence obligations.
- Explore opportunities to **adapt responsible recruitment practices** aimed at identifying and mitigating potential indicators of modern slavery.
- Explore opportunities to **pilot a meaningful employment and recruitment programme** for victims of trafficking.

OUR ORGANISATION’S STRUCTURE, BUSINESS, AND SUPPLY CHAIN

- Enhance the **visibility and reporting of workforce composition**, emphasising the intersectionality of vulnerable groups.
- Improve **transparency surrounding Tier 1 suppliers and supply chain data** through comprehensive analysis and mapping including categorisation based on operational and sourcing countries.

POLICIES RELEVANT TO SLAVERY AND HUMAN TRAFFICKING

- Assess and **enhance governance oversight** related to modern slavery and human trafficking in KPI and slavery reporting.
- Map and **evaluate existing governance frameworks** to identify coverage gaps concerning risks associated with modern slavery.
- **Strengthen sustainable procurement procedures**, incorporating human rights into a data ecosystem, systems and processes.
- Improve the understanding of DP World’s approach as outlined in the Human Rights Policy, **focusing on the drivers for implementing the UN Guiding Principles**, particularly in light of the regulatory environment in Europe regarding business and human rights.

DUE DILIGENCE

- Review, enhance and **create a plan to strengthen the due diligence processes** for DP World, incorporating data, systems, and procedures.

- Map and **evaluate existing supply chain governance processes** related to potential slavery risks, including cascading potential non-conformances, stakeholder collaboration, risk assessments, and grievance mechanisms.

RISK ASSESSMENT

- Build upon the **salient risk assessment**.
- Enhance our engagement with stakeholders and rightsholders, and strengthen our capacity to proactively assess, **identify, and prioritise salient human rights issues** and challenges.
- **Collaborate with expert stakeholders** to better understand the local context and associated human rights risks.
- Initiate a **supply chain mapping exercise and analysis**, focusing on supply chain and business relationships to identify high risk areas.
- Continue to assess and map DP World’s value chain, with a specific emphasis on workforce composition and the **intersectionality of vulnerable groups**.
- Further develop an **internal modern slavery matrix and risk score**, aligning it with value chain data and integrating it into the broader activities on data ecosystem.

EFFECTIVENESS

- Establish a reporting framework to ensure compliance with human rights and modern slavery objectives.
- Establish **alignment and fulfilment with both external and internal benchmarks and reporting obligations**.

- **Establish KPIs** to develop, lead, monitor, and ensure accountability for the implementation of various Human Rights, Modern Slavery and Wildlife Trafficking Programme deliverables, while maintaining a **focus on implementing effective processes for tracking outcomes and effectiveness**.

- Control Effectiveness: **Continue to expand the Group Risk and Internal Controls Standards (RICS)** assessment in i) scope of Human Rights and Modern Slavery Controls and ii) geographic coverage across Europe.

TRAINING

- Create **training programmes** for the future.
- **Raise awareness and enhance expertise** on Human Rights, Modern Slavery, and Wildlife Trafficking.
- Ensure all employees **complete mandatory modern slavery awareness training**, focusing on recognising signs, reporting procedures, and policies and stance on this issue.
- **Develop tailored training for specific audiences** regarding the modern slavery risks they may encounter.
- Continue collaboration and **engaging with external organisations, stakeholders, and other international business associations** to address modern slavery, share peer learning, and openly discuss challenges and solutions.

HIGHLIGHTS	STRUCTURE	GOVERNANCE	DUE DILIGENCE	RISK ASSESSMENT	EFFECTIVENESS	TRAINING	OUR FUTURE PLANS
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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Peninsular and Oriental Steam Navigation Company and P&O Ferries' slavery and human trafficking statement for the financial year ended 31 December 2024. It has been approved by both The Peninsular and Oriental Steam Navigation Company's and P&O Ferries Division Holdings Limited's Board of Directors.

A handwritten signature in white ink, appearing to read "Rashid", with a stylized flourish at the end.

Rashid Abdulla
CEO & MD at DP World Europe
Director, The Peninsular and Oriental Steam Navigation Company
Date: 30 June 2025

A handwritten signature in white ink, appearing to read "P. Hebblethwaite", with a stylized flourish at the end.

Peter Hebblethwaite
CEO P&O Ferries
Date: 30 June 2025