

Gifts & Hospitality Policy

APAC

POLICY DOCUMENT

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Introduction

DP World's *Code of Ethics* and *Global Anti-Corruption Policy* prohibits promising, offering, giving, requesting, approving or receiving "anything of value," including gifts, meals, entertainment and/or travel ("Hospitality") for the purpose of improperly influencing the action of an individual in the discharge of their duties, rewarding an individual for having broken a law or improperly performing a duty in the past, obtaining or retaining business, securing an improper advantage, or inducing an illegal or unethical action whether from the recipient or anyone else ("Bribe").

DP World's *Code of Ethics* prohibits employees from receiving "anything of value" that may impair the recipient's ability to impartially perform work or make objective decisions on behalf of DP World ("Conflict of Interest").

DP World also recognizes there are times when giving or receiving modest Hospitality is an appropriate way for businesspeople to display respect for each other and generate appropriate goodwill.

Purpose

This Policy provides guidance on the permissible forms of Hospitality, and corresponding processes to minimize the risk of providing or receiving Hospitality that may result in a potential or actual Bribe and/or Conflict of Interest. We must always behave in an ethical manner and exercise good judgment and seek guidance if we are unsure whether certain Hospitality is permitted by this Policy.

Scope

This Policy applies to all Hospitality promised, offered, given, requested, approved or received by APAC DP World directors, officers, and employees ("Employees") and any third-party conducting business on DP World's behalf, including, but not limited to, joint venture partners, agents, consultants, suppliers, vendors, and/or other third-party representatives ("Other Stakeholders").

However, this Policy does NOT address:

- Travel-related expenses incurred by DP World for DP World-business related activities (e.g., airfare to attend internal DP World meetings or client meetings), which are covered in DP World's Global Travel Policy.
- Gifts or hospitality given to Employees by the DP World and/or exchanged between Employees. Employees should seek guidance from the People department on such activities.
- Hospitality provided by DP World in connection with large corporate events hosted and/or sponsored by DP World. While the general policies of this Policy apply to all Hospitality provided by DP World, the monetary limits, pre-approvals and record keeping practices shall be governed by applicable Group Communication policies and/or guidance.

Policy

General Policy

1. DP World prohibits:
 - Paying, approving, offering, promising, giving or receiving Hospitality that is or that could be perceived as a potential Bribe or Conflict of Interest;
 - Any Other Stakeholders, family members, or friends acting on DP World's behalf to pay, approve, offer, promise, give or receive Hospitality that would be a violation of this Policy;
 - DP World employees or Other Stakeholders, family members, or friends personally paying for, providing or receiving Hospitality in an effort to circumvent this Policy; and/or

- Paying, approving, offering, promising, giving, or receiving, directly or indirectly, including via Other Stakeholders, family members, or friends:
 - Meals or Entertainment where no DP World Staff is present;
 - Cash or cash equivalents (e.g., gift cards or vouchers that can be redeemed for cash), except in limited situations where it is culturally appropriate to provide cash in relation to a funeral or other appropriate life event;
 - Side Trips in connection with travel-related Hospitality;
 - Per Diems, unless required according to local written law. If local law requires giving a Per Diem, DP World will not pay for any additional travel expenses;
 - Hospitality during, shortly before or after a tender process;
 - Hospitality repeatedly to the same recipients; and/or
 - Any kind of Hospitality that is inappropriate in a business context (e.g., gender exclusive, substance abuse, sex industry) or otherwise may be embarrassing if known by colleagues, customers, competitors, or the media.
2. DP World permits paying, approving, offering, promising, giving or receiving Hospitality that is:
- Permitted by local law and/or the policies of the intended recipient or giver's employer;
 - Provided or received:
 - As a token of esteem and courtesy;
 - In recognition of a genuine cultural tradition (e.g., Eid, Christmas, New Year) or life event (e.g., retirement, anniversary);
 - In direct relation to the promotion, demonstration, or explanation of DP World's products or services; or
 - In relation to execution or performance of a written contract;
 - Modest in value (i.e., not lavish) and within any monetary limits established by this Policy;
 - Pre-approved as required by this Policy;
 - Recorded in DP World's online Gifts & Hospitality Register;
 - Given openly and transparently;
 - Properly recorded in DP World's books and records; and
 - Consistent with all applicable Finance or other company policies.
3. Supplemental local policies may be developed which are more restrictive than this Policy and approved by the upline Senior Vice President and Regional Group Compliance Head. See Appendix I for current Supplements.

Monetary Limits & Pre-Approvals

1. Giving: Prior to offering or giving Hospitality to a third party that exceeds the monetary limits in the below Table: APAC Monetary Limits & Pre-Approvals, Employees must obtain written approval from their:
 - a. Direct Manager (email approval is acceptable); and
 - b. Group Compliance Head (or designee) by registering the Hospitality in the Gift & Hospitality Register.

2. **Receiving:** Employees who are offered Hospitality that (i) exceed the monetary limits in the below Table: APAC Monetary Limits & Pre-Approvals and are unable to decline the Hospitality -or- may have a legitimate business reason for accepting the Hospitality must:
 - a. Immediately register the Hospitality in the online Gifts & Hospitality Register; and
 - b. Notify their Direct Manager, People Department and Group Compliance Head who will advise on the course of action. Group Compliance Head (or designee) will record the advice in the Gifts & Hospitality Register.
3. **Local Limits:** Employees must also obtain any additional approvals as may be required by any supplemental local policies that apply to their business unit/local country. See Appendix I.

Table: APAC Monetary Limits & Pre-Approvals

Item	Amount/Recipient	Approval Requirement
Gifts / Meals / Entertainment	>\$200 USD	Direct Manager -and-
Cash-Based Memorial Gift	Any value – provide a copy of the funeral Notice	
Travel	Any value – consistent with DP World Travel Policies	Regional Group
Per Diems	Any value – if required by local laws	Compliance Head

Recordkeeping and Expense Reports

1. DP World will properly and accurately document all Hospitality-related expenses in its books and records.
2. DP World maintain all supporting documents associated with Hospitality-related expenses in accordance with applicable document retention policies.
3. Payments for Hospitality-related expenses should be paid directly to vendors (i.e., airlines, hotels, car rental companies) and not to an individual or government organization. Where direct payment is not possible, reimbursement is contingent upon the individual providing receipts for the actual expenses for which reimbursement is requested.
4. Employee Expense reports are a critical component of DP World’s books and records. Employees must provide the following information when seeking reimbursement for any Hospitality-related expenses:
 - Copy of the prior written approval, if required;
 - Name of each individual in attendance and his/her business title, the name of his/her company or organization or government affiliation;
 - Specific description of the business purpose of the gift, meal, entertainment or travel requirement;
 - Original itemized receipt(s); and
 - If applicable, the Approval ID from the Gift & Hospitality in the “Description Field” for the expense item.
5. When reviewing Hospitality-related expenses, Managers are expected to monitor that employees provide accurate and complete details regarding expenses. If there are any concerns about the completeness or accuracy of an employee’s expenses or their compliance with this Policy, Managers are expected to re-educate their employees and consult People and/or Group Compliance about appropriate corrective measure, as applicable.

Failure to Comply and Penalties

1. Employees who fail to comply with this Policy may be subject to:
 - Delay or withholding of expense reimbursement(s);
 - Loss of corporate credit card privileges; and/or
 - Disciplinary action, up to and including termination of employment.

Questions or Concerns

1. Employees are expected to report potential or actual violations of this Policy directly to DP World's Whistleblowing Hotline or other dedicated channels listed on the whistleblowing webpage <https://dpworld.ethicspoints.com>. See the Whistleblower Policy for specific guidance.
2. Employees should direct questions or concerns about this Policy to their Direct Managers or Group Compliance.

Related Standards, Policies and Processes

Anti-Bribery Policy
 Code of Ethics
 Gifts & Hospitality FAQs
 Whistleblower Policy

Definitions and Terms

Identify and define any acronyms, definitions or jargon used in the policy that are not fully explained in the text, using the below table:

In this Policy the following definitions apply, unless the context requires otherwise:

Bribe	Promising, offering, giving, receiving, requesting, approving, soliciting, and/or receiving Anything of Value for the purpose of improperly influencing the action of an individual in the discharge of their duties, rewarding an individual for having broken a law or improperly performing a duty in the past, obtaining or retaining business, securing an improper advantage or inducing an illegal or unethical action whether from the recipient or anyone else.
Conflict of Interest	Anything of value that may impair the recipient's ability to impartially perform work or make objective decisions on behalf of DP World.
Entertainment	An event that occurs when a DP WORLD employee is present at an activity (e.g., sporting event) other than a business meal. If an DP WORLD employee is not present at an activity (e.g., sporting event), the item would be considered a Gift.
Gifts & Hospitality Register	Global online tool where employees can register and obtain written approval from Regional Group Compliance as may be required by this Policy.
Government Official	Includes any: <ul style="list-style-type: none"> • Individual who holds a legislative, administrative or judicial position of any kind, whether appointed or elected, of a country or territory, or any subdivision of a country or territory; • Politician, political candidate or political party official; • Member of a royal or governing family; • Employee or official who exercises a public function for a government entity such as customs, immigration, port authority, or permitting department; • Employee or official of a government-owned or controlled COMPANY, such as a national oil company (e.g., Saudi Aramco, ONGC, Sinopec, PdVSA); • Employee of a public international organization, such as the United Nations or World Bank; • Representative of or any person otherwise acting on behalf of any of the foreign; and • Relatives of any of the above.

Per Diem	A daily allowance paid in cash or a cash equivalent, to cover meal, entertainment and travel expenses.
Side Trip	An activity or travel that is generally recreational in nature and does not have a specific, legitimate and direct relationship to an actual business purpose. This activity is in addition to an activity or travel that does have a specific, legitimate and actual relationship to an actual business purpose.
Travel	Expenses such as: 1) airfare; 2) train; 3) hotel; and 4) other similar expenses.

History

Version Number	Review Date	Summary of Changes
1.0	May 2024	New Policy

This Policy has been developed by Group Compliance and is subject to annual review.

Approved by: Group Compliance, SVP
Department: Group Compliance
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**ALL QUERIES IN RELATION TO THIS
POLICY SHOULD BE DIRECTED TO
GROUP COMPLIANCE AT**

<mailto:groupcompliance@dpworld.com>

Appendix I – Local Supplements

A. China Supplement: Government Officials

1. Prior to giving or receiving a Gift, Meal or Entertainment that exceeds \$25 USD (200 RMB) to or from a Chinese Government Official, employees must obtain written approvals from their Direct Managers (via email) and Group Compliance (by registering the gift in the online Gift & Hospitality Register.)
2. All Gifts provided to Chinese Government Officials will be delivered to the official address of the Government Official and addressed to the relevant Government department (entity) instead of a specific individual.