

# Fraud

# TABLE OF CONTENTS

INTRODUCTION .....	3
PURPOSE .....	3
SCOPE .....	4
POLICY .....	4
DEFINITION OF FRAUD .....	4
IMPLEMENTATION RESPONSIBILITIES .....	5
FRAUD PREVENTION .....	5
FRAUD DETECTION .....	6
MANAGEMENT MONITORING .....	7
AUDITING .....	7
FRAUD RESPONSE .....	7
FRAUD RESPONSE GUIDE .....	7
REPORTING PROCEDURES .....	7
INVESTIGATIONS .....	7
ENFORCEMENT AND ACCOUNTABILITY .....	8
ADMINISTRATION PROCEDURES .....	8
RELATED STANDARDS, POLICIES AND PROCESSES .....	9
DEFINITIONS AND TERMS .....	9
HISTORY .....	12

# Introduction

- 1.1 DP World operates in diverse cultures and business environments, and is dedicated to the prevention, detection, avoidance and response to fraud, dishonesty, non-compliance, and corruption. Our business success is dependent on our reputation for achieving high standards and this policy addresses the commitment to a company zero-tolerance position on fraud and any form of corruption.
- 1.2 It is the intent of DP World to promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development of controls and the conduct of investigations. To achieve this position, the company's philosophy, and expectations in relation to fraud control and ethical behaviour requires clear planning, prioritisation, and communication.
- 1.3 The DP World Fraud Management Framework (FMF) was developed to define responsibilities; to ensure that employees at all levels have a clear understanding of what is expected of them; to know that DP World Group (the 'Group') takes the threat of fraud seriously; to know where to seek assistance and to prevent, and/or manage the impact of, fraud incidents that could adversely impact the Group.

## Purpose

- 2.1 The purpose of this policy is to foster understanding of fraud and DP World's response to it; to facilitate the development and application of controls that will aid in prevention, detection, and response.

<b>BOARD / AUDIT COMMITTEE OVERSIGHT / FMF ADVISORY PANEL</b>		
EXECUTIVE MANAGEMENT / REGIONAL MANAGEMENT / BUSINESS UNIT HEADS		
PREVENTION	DETECTION	RESPONSE
Policies and Standards	Reporting Mechanisms – Whistleblowing	Fraud Management Framework
Fraud Risk Assessment	Auditing	Fraud Investigations
Communications and Training	Monitoring by Management	Reporting Procedures
Senior Management 'Tone at the Top'		Enforcement and Accountability

- 2.2 It will ensure that Management are aware of their responsibilities for identifying exposures to fraudulent activities, and for establishing controls and procedures for preventing such fraudulent activity, and/or detecting and reporting such, when it occurs. It will also provide a clear statement to employees prohibiting any illegal activity, including fraud, for the benefit of the Group.
- 2.3 This policy requires effective accountability mechanisms for the use of the Group's resources to support the fraud control environment. It is also designed to endorse the Group's commitment in protecting its assets, property, intellectual rights, integrity, security and reputation from any attempt to gain financial or other benefits by deceit.

## Scope

- 3.1 This policy is applicable to all DP World employees, stakeholders, consultants, vendors, contractors, its subsidiaries, and any company or entities managed or operated by them. It is accessible on DP World's *Connexions* intranet and on the [dpworld.com](http://dpworld.com) website.
- 3.2 The Head of Fraud Risk Services (HFRS), Group Internal Audit, is responsible for the administration of this policy, and its periodic review. DP World Management are responsible for awareness and adherence to the Policy.

## Policy

### Definition of Fraud

- 4.1 Fraud is an intentional dishonest act or omission carried out with the purpose of deceiving, inducing a course of action or the making of false statements, orally or in writing, with the objective of obtaining money or other benefits from the Group, or of evading a liability to the Group. Fraud is not restricted to monetary or material benefits. This definition includes monetary gain and any benefit that could be gained from the Group.
- 4.2 A basic test for fraud could include the following questions:
  - Was deception employed?
  - Was the action unlawful/unethical?
  - Did it result in money/benefits being received which the person or entity was not entitled to?
  - Was an attempt made to carry out any of the above?

It can include, but is not limited to:

- Any dishonest or fraudulent act.
- Misappropriation of funds, supplies or other assets.
- Impropriety in handling/reporting of money or financial transactions.
- Profiting because of insider knowledge of company activities.

- 4.3 Other irregularities concerning an employee's moral, ethical, or behavioural conduct should be resolved by departmental management and the Business Unit People Department rather than FRS. If there is any question as to whether an action constitutes fraud, contact the Head of FRS.
- 4.4 It is accepted that fraud risk is endemic in any administrative environment where opportunities exist for abuse and mismanagement. To reduce this risk, the Group is committed to an emphasis on fraud prevention, detection, and effective response as part of its financial management policies.

In the event of a fraud allegation or incident, the Business Unit should refer in the first instance to the Fraud Response Guide (part of the FMF) which gives guidance on next steps to take in line with this policy. This is available on DP World Connexions.

## Implementation Responsibilities

4.5 DP World Management is responsible for preventing and detecting fraudulent acts and other irregularities. Business Unit Management (BU) are responsible for establishing and maintaining proper internal controls that provide security and accountability for the resources entrusted to them. Business Units should incorporate fraud controls into their annual planning processes, ensure they are implemented and that there are mechanisms in place within their area of responsibilities to:

- Assess the risk of fraud;
- Promote and communicate, through various tools, employee awareness of ethical principles (“tone at the top”) and the related policies.
- Educate employees about fraud prevention and detection.

4.6 Fraud Risk Services (FRS) is a team based in Corporate Office, responsible for:

- Enforcing the requirements of this policy.
- Identifying and appointing **BU Fraud Risk Champions**, wherever possible, to support in the application of this policy e.g. training, awareness, and investigation support; providing appropriate training to Fraud Risk Champions on roles and responsibilities.
- Providing support and guidance to management in the application of the Fraud Management Framework across the Group.
- Developing, and then co-ordinating and supporting rollout of fraud awareness training and Fraud Risk Assessments at business units, corporate functions, divisions, and regions with the involvement of Fraud Risk Champions where existing.
- Investigating all instances of reported fraud or allegations of fraud, whether through the whistleblowing hotline or raised by management directly.

4.7 The Head of FRS has the approval and rights, under the Fraud Charter, to:

- Conduct or coordinate all investigations into matters of fraud or serious misconduct, using support from internal/external technical resources and/or BU Fraud Risk Champions.
- Conduct all necessary initial interviews, or accordingly direct a member of the Fraud Risk Services Team assigned (which may include the relevant BU Fraud Risk Champion).
- Liaise with other departments, e.g. People and Legal, as necessary and appropriate; and
- Communicate fraud incidents, findings, and recommendations for action to management in line with established communication protocols as defined in the FMF.

4.8 The FMF Advisory Panel (FMF AP) will provide support and advice to HFRS where requested, to enable FRS to perform its functions and obtain resources needed.

## Fraud Prevention

4.9 Practical communication and training is the first step to ensure employees are aware of their obligations concerning fraud and misconduct. Like all compliance efforts, effective fraud control means educating DP World employees to understand the critical role they play in the prevention or detection of fraud. This policy recognises and commits to such compliance and prevention measures.

4.10 Ongoing fraud awareness commitment messages from Corporate, Divisional, Regional and BU management should be communicated to employees to assist in their understanding of fraud issues and the Group’s zero tolerance of fraud. It is FRS responsibility to provide guidance and support to

management teams in the content and style of awareness messaging. Such awareness messaging should increase the likelihood of detection and reporting and thereby reduce fraud occurrence.

- 4.11 Vulnerabilities within employment recruitment processes and insufficient due diligence can lead to fraud. The BU People departments should develop awareness procedures to assist in fraud prevention and detection within staff recruitment, induction and development. People management should seek assistance and guidance from FRS in achieving this.
- 4.12 Similarly, vulnerabilities within vendor induction processes and insufficient due diligence can lead to fraud. The BU Procurement departments should develop awareness procedures to assist in fraud prevention and detection within vendor identification, selection, induction, and the ongoing relationship. Procurement management should seek assistance and guidance from FRS in achieving this.
- 4.13 An effective fraud prevention strategy must recognise the importance of prompt action required when fraud is detected, to bring an end to the fraud, as well as discourage future fraud. Education, training and awareness are prevention strategies that DP World is committed to undertaking. Appropriate training should be provided to all DP World stakeholders to ensure there is a wide understanding of what fraud is, why it happens, what to look for, as well as an awareness of mechanisms for detecting and reporting fraud, which should be repeatable and ongoing. This training is delivered by multiple routes, including face-to-face workshop sessions occurring in FRS regional travel itineraries, live online and face-to-face training by FRC's at BU level, and online training modules accessible to individuals through DPWorld Hub.
- 4.14 Fraud Risk Assessments (FRA) and Fraud Awareness sessions are designed to help management work together to identify the key fraud risks within a business and its core processes to establish if adequate controls are in place to mitigate these fraud risks. FRS will plan annually to complete various FRA's and awareness sessions across the group, make available equivalent online training resources, and will train Fraud Risk Champions to run these locally.

## **Fraud Detection**

### **Whistleblowing Hotline**

- 4.15 Management is expected to be alert, recognise risks and exposures inherent in their area of responsibilities and be aware of indicators of fraudulent or corrupt acts. They should:
  - a. Display a positive and appropriate attitude towards laws, rules and regulations; and the compliance with such.
  - b. Promote employee awareness of the Whistleblowing Hotline and the Whistleblowing policy through use of appropriate communications.
  - c. Respond to all allegations or indications of fraudulent or wrongful acts in a manner outlined in the Fraud Management Framework.
- 4.16 All employees are required to act honestly and always with the highest levels of integrity and ethics when conducting business for the Group, in line with the Code of Ethics. They have the responsibility to report suspected fraud or any wrongdoing in a timely manner (refer 'Investigations' section below). Any employee who suspects fraudulent activity must immediately report this in accordance with the Whistleblowing policy.

## **Management Monitoring**

- 4.17 Management should be aware of the behavioural 'red flags' of fraud, which individuals may display. These do not necessarily confirm fraud but are areas for management to monitor. Examples may include living beyond means, financial difficulties, unusually close association with a vendor/customer, unwillingness to share duties, or refusal to take vacations. Further examples and descriptions are available on request from the FRS team or may be found in the FRS pages on Connexions. and can be communicated to teams through fraud awareness trainings, delivered by the Fraud Risk Champions.
- 4.18 Other monitoring may include processes of employee performance management, and rigorous risk assessment processes.

## **Auditing**

- 4.19 Internal Auditors are not specifically tasked to detect fraud; they are, however, trained to look for 'red flags' during their work. They also identify control weaknesses or gaps which may increase the risk of fraud and will consider these risks as part of their work during scheduled audits.

## **Fraud Response**

### **Fraud Response Guide**

- 4.20 In the event of a fraud allegation or incident, the Business Unit should refer in the first instance to the Fraud Response Guide (part of the FMF) which gives guidance on next steps to take in line with this policy. This is available on DP World Connexions.

### **Reporting Procedures**

- 4.21 Any irregularity that is detected or suspected should be reported immediately to the Head of Fraud Risk Services, who co-ordinates all investigations and will serve as the official contact for reporting all fraudulent acts concerning DP World and its stakeholders.

### **Investigations**

- 4.22 When information relating to actual or potential fraud and misconduct has arisen, a comprehensive and objective internal investigation is required to gather facts leading to an objective and credible assessment of the suspected violation and allow management to decide on a course of action.
- 4.23 The Head of Fraud Risk Services has the primary responsibility for the investigation of all suspected fraudulent acts, bribery, corruption or serious wrongdoing, and will initially undertake or oversee a fact-finding review, using relevant technical or professional experts as required, to determine next steps.
- 4.24 Not all fraud investigations are identical, and processes may differ, but methodology and principles should remain constant. This policy identifies the importance of early identification and reporting of all fraud concerns for investigation. Any breach that falls within the definitions of this policy, that comes to the attention of any employee, must be reported in a timely manner to the Head of Fraud Risk Services. Fraud investigations must not be initiated by any other parties within the Group, unless with prior acknowledgement by the Head of Fraud Risk Services.
- 4.25 An important aspect to encourage accountability and transparency within an organisation is a mechanism to enable all individuals to voice concerns internally in a responsible and effective manner when they discover information which they believe shows wrongdoing. DP World has an independently hosted and

secure whistleblowing hotline to provide a mechanism to confidentially report workplace concerns and enable employees to highlight problems before they damage DP World business, reputation, or employee morale.

- 4.26 Any whistleblowing report passed to the Head of Fraud Risk Services will be kept confidential, and any such report or information, or any details pertaining to any possible matter of fraud, will only be conveyed to those people who require the knowledge in the proper performance of their office or function. Strict confidentiality concerning the complainant and the information will be maintained at all stages of the investigation.
- 4.27 DP World will not tolerate any retaliation of any kind relating to reporting parties where a report has been made in good faith. Whistleblowers should be assured that they will not be victimised or disadvantaged in reporting a breach and any person who considers they are being victimised or disadvantaged because of such reporting, should in the first instance contact their local People department or the Head of Fraud Risk Services.
- 4.28 Caution is advised during a fraud investigation to avoid being misled by unfounded accusations or alerting individuals against whom an allegation has been made. Accordingly, the complainant/informant or the line manager should not:
  - a. Attempt to personally conduct the investigation in any way.
  - b. Contact the suspected individual to determine facts or demand restitution.
  - c. Discuss any facts, suspicions or allegations associated with the investigation with anyone, unless specifically directed by Fraud Risk Services.

### **Enforcement and accountability**

- 4.29 A consistent and credible disciplinary system is a key control that can be effective in deterring fraud and misconduct. People departments should enforce a uniform and consistent application of disciplinary process regardless of job tenure, level, or function.
- 4.30 Line managers are responsible to ensure:
  - a. Employees receive adequate training.
  - b. No direction or pressure to violate company standards to meet business objectives or set unrealistic goals that have the same effect.
  - c. No retaliation against others for reporting concerns.

## **Administration Procedures**

- 4.31 When a breach within the definitions of this policy comes to the attention of any DP World employee or any other person covered in the scope of this policy, it must be reported promptly.
- 4.32 If any employee has any doubt or uncertainty as to the accuracy or veracity of the information, or doubts whether they have a duty to report, or any other concern regarding the information, it is strongly encouraged to notify the Head of Fraud Risk Services in a timely manner, regardless of the doubt.
- 4.33 Mechanisms for confidential reporting are described in the Whistleblowing Policy which can be accessed through Connexions or local intranets, or through the Group company websites.

# Related Standards, Policies and Processes

This policy should be read in conjunction with:

- DP World Whistleblowing Policy
- DP World Anti-Bribery Policy
- DP World Code of Ethics
- Human Rights Policy
- Human Rights Statement
- Modern Slavery & Human Trafficking Policy
- Vendor Code of Conduct

## Definitions and Terms

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

<b>Conflicts of Interest</b>	<p>This may take many forms but generally arises when an employee of the Group could use the authority of his or her position to</p> <ul style="list-style-type: none"><li>• influence the Group's business decisions in ways to give improper advantage or financial benefit to oneself and/or family members, or</li><li>• obtain for oneself, friends, associates or family members a financial benefit beyond the compensation he or she is authorised to receive for performing his or her responsibilities.</li></ul> <p>The following ethical principles should be utilised by employees as guidance to avoid any potential conflicts, but more detail can be found in Corporate and local People policies:</p> <p>a. Personal relationships in the Workplace: No employee of the Group may participate in decisions involving a direct benefit to family members. This may include decisions involving appointments, salary, promotion, retention, performance evaluations or work assignments, as examples. Such decisions should be taken by unrelated third parties.</p> <p>b. Business decisions: Employees of the group must not make or influence business decisions from which they or a family member will personally benefit, and any employee who stands to benefit from a contract must declare it to their line managers.</p> <p>c. Group resources: It is a conflict when the use of the Group's resources results in personal and/or financial gain to an employee and/or family member(s).</p> <p>d. Gifts and hospitality: DP World only allows gifts and hospitality to be given and received if they are modest, appropriate, and consistent with its values. Giving and receiving Gifts and Hospitality can be an acceptable part of business life, but they can also be very problematic. Improper Gifts and Hospitality can be wasteful, act as camouflage for bribes, and hurt our reputation. Consequently, DP World staff are only</p>
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	allowed to give and receive gifts and hospitality in narrow circumstances. (Please refer to the DP World Anti-Bribery policy).
<b>Connexions</b>	The DP World corporate intranet accessible to many employees. Where Connexions is not accessible, employees may find equivalent resources on local intranets.
<b>Fraud</b>	means an intentional dishonest act or omission carried out with the purpose of deceiving, inducing a course of action or the making of false statements, orally or in writing, with the objective of obtaining money or other benefits from the Group, or of evading a liability to the Group. Fraud is not restricted to monetary or material benefits. This definition includes monetary gain and any benefit that could be gained from the Group.
<b>Fraud Management Framework (FMF)</b>	Approved by the DP World Audit and Risk Committee, this framework provides DP World Fraud Risk Services with the necessary policies and processes to allow for the effective, efficient and consistent handling of all incidents or concerns reported to it.
<b>Fraud Management Framework Advisory Panel (FMF AP)</b>	A body established by DP World to support Fraud Risk Services in the handling of fraud cases that may cause financial or reputational losses to DP World, as well as promoting awareness of the FMF and the Fraud policy. It is composed of 4 permanent members from the Executive Management Team. The Panel includes members from Group Legal, People, Security and Group Internal Audit.
<b>Fraud Risk Champion (FRC)</b>	An executive appointed by Head of Fraud Risk Services to represent FRS at BU level; to assist in the prevention, detection and investigation of fraud. FRCs facilitate fraud awareness through ensuring visibility of the Group policies, the hotline and by conducting fraud training. FRCs may conduct, or support FRS in conducting, local investigations of suspected fraud. The full duties of the FRC are found in relevant documents within the FMF.
<b>Fraud Response Guide</b>	A component of the FMF, and available on Connexions and some local intranets.
<b>Fraud Risk Services (FRS)</b>	The team of qualified people designated to apply and enact all elements of the DP World Fraud Management Framework, including investigation of fraud incidents, under the supervision of the Head of Fraud Risk Services.
<b>Group</b>	refers to DP World, its subsidiaries and any company or entities managed or operated by them.
<b>Group Internal Audit</b>	refers to an independent body established by The DP World Limited Board of Directors with oversight by the DP World Limited Board Audit and Risk Committee.

Head of Fraud Risk Services (HFRS)	The most senior person within the Fraud Risk Services department.
<b>Investigation</b>	a process designed to gather and analyse information, to determine whether a fraud incident report is substantiated, or if any dishonest or unethical acts have occurred and if so, the party or parties responsible.
<b>Management</b>	this includes all Executive Management of the Group at every level and location, this includes but is not limited to, SVPs, VPs and Heads of Departments or Divisions.
<b>Malicious</b>	an unfounded and untrue report made that is characterised by malice, hatred, and disregard or to be deliberately harmful or spiteful.
<b>Recklessly</b>	where an act has taken place in such a manner that the party carrying out the act is indifferent to or disregardful of the consequences. Some form of loss is usually associated with acts of recklessness. Recklessly also means being neglectful, careless, thoughtless and unconcerned.
<b>Stakeholder</b>	in this policy context means any employee, (direct and indirect), partner, customer, any person or entity involved in the Group's supply chain, as well as members of the public who wish to express any sort of concern about the Group's business integrity.
<b>Whistleblower</b>	a person, who is, or represents, a stakeholder and who raises a genuine concern in 'good faith' and discloses information of suspected wrongdoing.
<b>Whistleblowing</b>	the disclosure of information which relates to suspected wrongdoing, and not information disclosed maliciously, recklessly or for personal gain. This may include: <ul style="list-style-type: none"> <li>o Criminal activity</li> <li>o Miscarriages of justice</li> <li>o Danger to health and safety</li> <li>o Damage to the environment</li> <li>o Failure to comply with any legal or professional obligation or regulatory requirements</li> <li>o Bribery</li> <li>o Financial fraud or mismanagement</li> <li>o Negligence</li> <li>o Breach of DP World internal policies and procedures including breaches concerning Human Rights and any form of trafficking.</li> <li>o Conduct likely to damage DP World's reputation</li> <li>o Unauthorised disclosure of confidential information</li> <li>o The deliberate concealment of any of the above matters.</li> </ul>

## History

<b>Version Number</b>	<b>Review Date</b>	<b>Summary of Changes</b>
002	January 2018	Updated to align with the Fraud Management Framework, mandated by the Fraud Charter, that clearly sets out DP World's commitment to the detection, prevention and investigation of fraud and subsequent protection of the company corporate assets and reputation.
003	December 2021	Updated to reflect revision of the Fraud Management Framework, other changes in related functions, and changes in the standard format of policy documents.
004	June 2023	Corrections to definition of a Fraud Risk Champion

This Policy has been developed by DP World Fraud Risk Services and is subject to annual review.

Approved by: Group Chairman and CEO  
Fraud Risk Services  
Revision Number: 004  
Revision Date: July 2023

**ALL QUERIES IN RELATION TO THIS  
POLICY SHOULD BE DIRECTED TO  
HEAD OF FRAUD RISK SERVICES AT**

<mailto:FRS@dpworld.com>