

ENVIRONMENT, HEALTH AND SAFETY PLAN 2023/24

Incorporating Group EHS Strategy & Targets

TABLE OF CONTENTS

Foreword from Claudio Veritiero, CEO	3
Introduction	4
Peel Port Core Values	6
Our Environment, Health & Safety (EHS) Vision and Goal	7
Our Safety Behaviours	8
Our Peel Ports Journey so far	10
Measuring Performance	12
Our New Environment, Health and Safety (EHS) Strategy for 2022 to 2025	14
Controlling Risk	16
Learning Together	17
Working in Partnership	18
Caring for our assets	19
Being Prepared	20
Protecting Health	21
Reducing our Impact	22
Leading for Safety	23
Strategy Targets	24
Port Cluster Targets & Objectives for 2022/23	26
Prioritising & delivering the EHS Strategic Plan – Year 2 2023	34
APPENDIX I: Glossary of Terms	82
APPENDIX II: Group Environment Policy	84
APPENDIX III: Group Health, Safety and Welfare Policy	86
APPENDIX IV: Group Quality Policy	88
APPENDIX V: Group Port Marine Safety Code Policy	90
APPENDIX VI: Climate Change Policy	92
APPENDIX VII: Resource Management Policy	94
APPENDIX VIII: ESG Policy	96
APPENDIX IX: Mobile Device Policy	98
APPENDIX X: Fair and Just Culture Policy	100



Welcome

Our ultimate aim of zero harm continues to be our ambition here at Peel Ports and my number one priority. Ensuring we all work safely, remain healthy and minimise our impact on the environment should just be the way we do business.

I am pleased to report that our continued collective efforts to reduce total recordable injuries in line with our current 3 year strategy remains on track with 20% reduction in 2022/23, which maintains our position as the leading performer in our industry sector, which is something, we should all be proud of.

In 2022/23 we set out an ambitious plan to deliver our new strategy spanning eight core themes:



In delivering last years plan we introduced a new permit to work system hosted on iAuditor designed to reflect the nature of our activities and to improve safety. We have trialled our new 'Fair & Just' culture model, designed to reflect an open and transparent approach to dealing with the outcome of incidents and have set about planning a broader roll-out across our business. A highlight for the year was training over 140 Mental Health First Aiders, there to support anyone of us if we need it. We have launched our new 5 year sustainability strategy aligned to the UN's Sustainable Development Goals, marking us out as a leading organisation in delivering our ESG goals These are just some of the notable achievements we have made in delivering year one of our 3 year plan and there is more to come...

In this 2023/24 plan we will continue to lead the way in developing further enhancements and improvements to our environment, health and safety management systems. We will remain absolutely focussed on reducing injuries, which is why we have set ourselves a further 20% reduction target in 2023/24, continuing our focus in making Peel Ports a safer, healthier and more environmentally aware business, helping us to deliver on our ambitions for the future.

Thank you

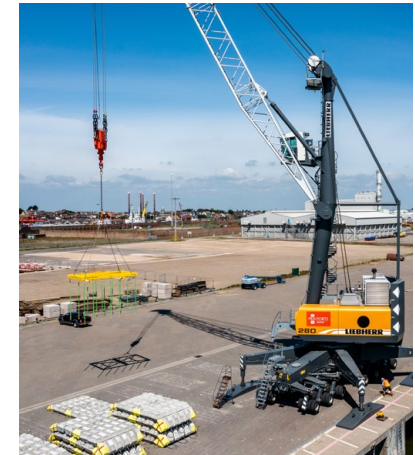
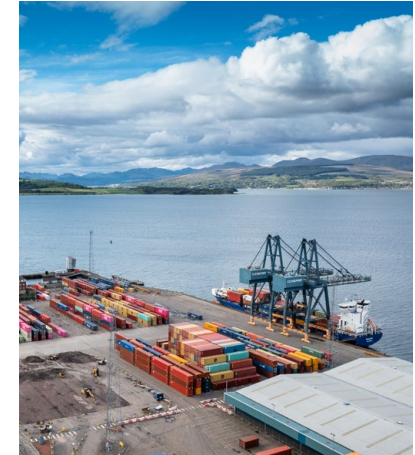
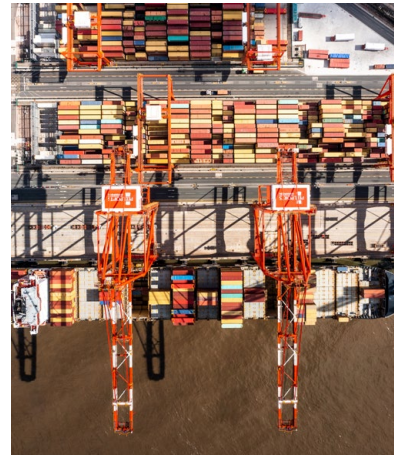
Claudio Veritiero
CEO, Peel Ports

01. INTRODUCTION

This plan has been produced to provide strategic direction in the matters of Environment, Health and Safety (EHS) for Peel Ports Group. It provides information on the delivery programme for the three-year period running from 2022 to 2025, in addition to providing an overview of the Peel Ports EHS journey to date.

The delivery of the new 3 Year Strategic Environment, Health and Safety strategy will help us to:

- Build on the current injury reduction rates
- Embed and drive compliance through risk-based auditing and assurance
- Use our data and analytics to drive and measure our performance and effectiveness in Environment, Health & Safety (EHS)
- Learn from our incidents and accidents to improve our EHS systems and controls
- Use innovation and technical advancements to reduce or eliminate risk
- Invest in our people through technical training and competence assessments for EHS
- Enable our team leaders, supervisors and managers to effectively lead for EHS
- Improve our safety risk management processes (RA/PTW etc) and safe systems of work
- Create and manage an effective EHS management system to allow us to always find the right document at the right time
- Reduce the impact of our operations on people and the environment



02. COMING SOON - PEEL PORTS NEW CORE VALUES



Working **together** we act
in a **responsible** way to
deliver **excellence** and
enable success

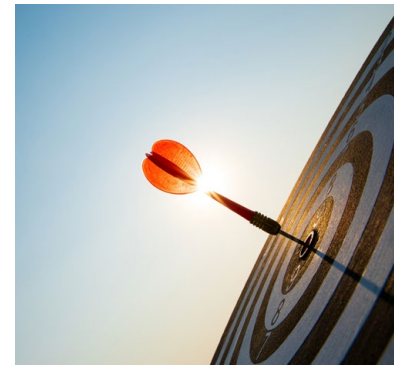
Launching June 2023

[peelports.com](https://www.peelports.com)

Peel Ports
More than Ports

03. A REMINDER OF OUR ENVIRONMENT, HEALTH & SAFETY (EHS) VISION AND GOAL

We have a very clear vision for EHS which provides focus on our ambitions to continue to work towards our target of zero harm, together with our goal this will help us to achieve our true potential and inspire us all to deliver a healthy & safe environment for us to work in.



Our Vision

To ensure we protect our
people and the environment.

Our Goal

We work together to ensure
our operations are managed
effectively to target zero harm.



04. SAFETY BEHAVIOUR MODEL

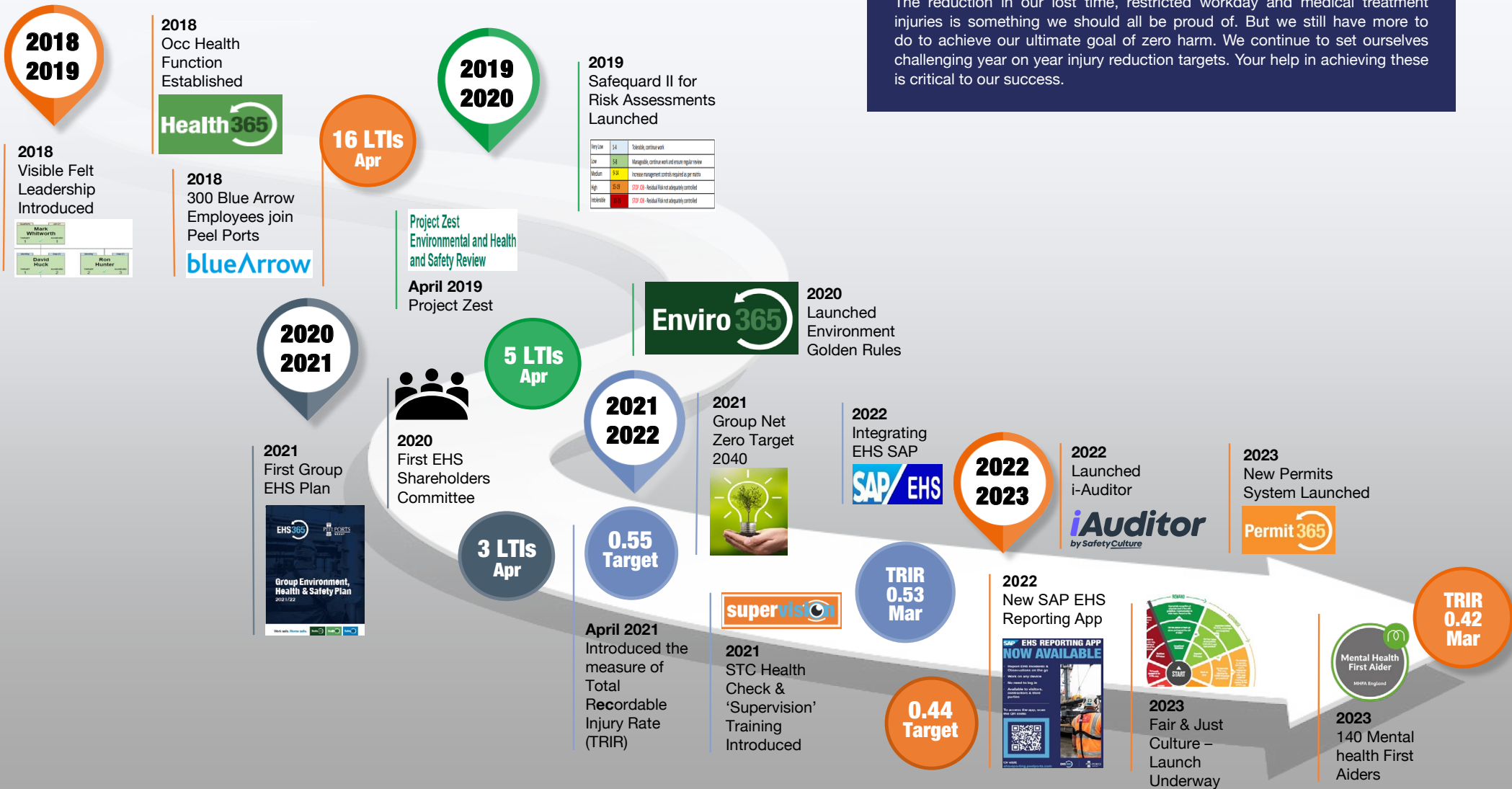
Our behaviour model focuses on five key areas of focus:
Culture | Competency | Communication | Conformance | Consistency
 and is designed to illustrate how the business manages to develop the right attitude and behaviours towards safety and zero harm.



05. OUR PEEL PORTS JOURNEY SO FAR

Achieving success at Peel Ports is something we strive for and we have come a long way in the past 5 years. Recognising the successes, we have all had in delivering improvements in our health, safety and environmental performance is important and provides us with a great foundation to build on as we embark upon our next stage of the journey.

The reduction in our lost time, restricted workday and medical treatment injuries is something we should all be proud of. But we still have more to do to achieve our ultimate goal of zero harm. We continue to set ourselves challenging year on year injury reduction targets. Your help in achieving these is critical to our success.



06. MEASURING PERFORMANCE

It is important that as an organisation we measure our performance utilising both leading and lagging indicators. We use these to help us understand how effective our EHS management systems are and also help us identify where we need to focus our attention to continually improve.

Some key measures from 2022/23



TRIR
0.42



EHS Audit % Compliance
87%



Hazard Observations
4144



VFL Tours
5757



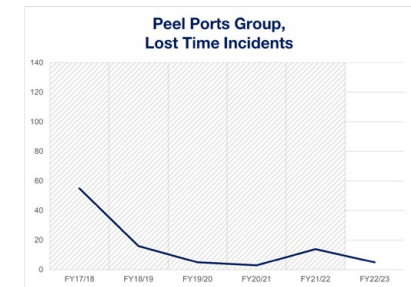
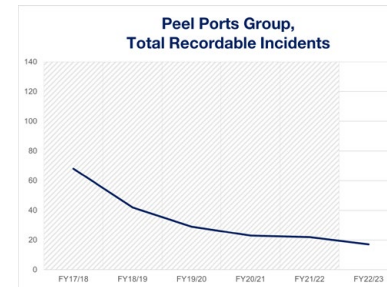
Health Surveillance and Screening %
98%



Group EHS Plan 2022/23 Completion %
97%

In 2021 we evolved our metric for reporting injuries at work to the wider definition of Total Recordable Injury Rate (TRIR), this has enabled us to focus not only on Lost Time Injuries (LTI) but also on Restricted Work Injuries (RWI) and Medical Treatment Injuries (MTI). Our ambition of targeting zero harm is something we collectively remain focussed on and will continue to be a key safety metric for us throughout the period of the EHS 3-year strategy 2022 - 2025.

The graphs below compare the significant progress we have made in our safety performance since 2018.



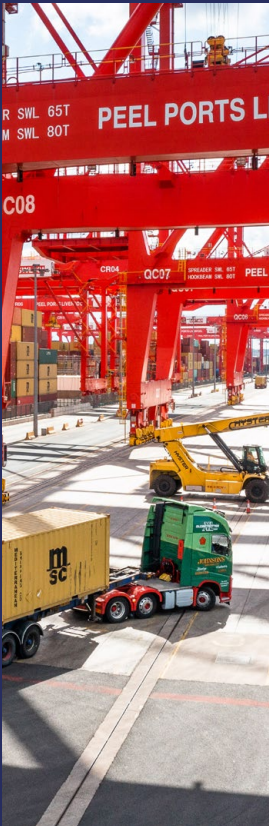
We all have a responsibility for looking out for ourselves and others, this is the way we will continue to lead our sector performance in terms of injuries reported at work. The way we all lead on safety through reporting accidents, incidents and near misses helps us to understand where we must focus our attention in our journey towards zero harm.



In 2022 we introduced a new way of reporting incidents and undertaking investigations, this new tool EHS SAP has helped us to interrogate the data and identify where we can improve. It is important that our positive reporting culture is maintained, your continued support is necessary to achieve this.

Recognising the importance of reporting safely whilst out on site, we introduced a new mobile reporting app in 2022. This will help us to capture observations, incidents and events in a timely manner and lead to more effective investigations and ultimately improvements in the lessons we can learn to prevent repeat incidents.





07. OUR NEW ENVIRONMENT, HEALTH AND SAFETY (EHS) STRATEGY FOR 2022 TO 2025

To deliver continued improvements in our EHS performance we needed to understand the journey which we have been on and importantly be clear on our plans for the future. Delivering sustained improvements in the areas of safety, health and environment is something we are passionate about here at Peel Ports and aligns to our core values and behaviours.

Creating and establishing a long-lasting safety culture is key to delivering our ambitious 3-year strategy, taking our business from 'compliance to culture' is a key element of this and will ensure we are successful. For ourselves, our customers, visitors and suppliers we want everyone to understand that our success is built on this strong culture and is recognised as being 'this is just the way we do things around here' which links to the EHS strategy vision and goal of targeting zero harm.

Providing a group strategy and direction is essential for delivering consistency across Peel Ports but we also recognise that driving local ownership and improvement programmes at port and terminal level will be key to its success.

Our new strategy incorporates eight strategic themes, these have been chosen as they represent the key areas which will help us deliver on our ambitions.

THEY ARE:

 <p>CONTROLLING RISK</p>	 <p>LEARNING TOGETHER</p>	 <p>WORKING IN PARTNERSHIP</p>
 <p>CARING FOR OUR ASSETS</p>	 <p>BEING PREPARED</p>	 <p>PROTECTING HEALTH</p>
 <p>REDUCING OUR IMPACT</p>	 <p>LEADING FOR SAFETY</p>	<p>We will now take each strategy theme and cover it in more detail in the plan »</p>

We are now into year 2 of the strategy and have already delivered a number of key EHS improvements and interventions. Identified against each of the theme deliverables we have indicated those projects either delivered or underway



CONTROLLING RISK

The management of risk is a continuous process and a fundamental cornerstone of all environment, health and safety (EHS) management systems. We will make sure that before starting work we have identified the potential health, safety and environmental hazards and risks; selecting the control measures to put in place to reduce the potential for harm to people's health, safety and environment

This strategy theme will focus on delivering this through:

-  **Creating and embedding Policy, Procedure, Information and Guidance for EHS**
-  **Improving and simplifying risk assessment processes and systems**
-  **Designing and implementing a Group Permit to Work system**
-  **Delivering and implementing an effective EHS Document Management System**
-  **Establishing an 'Incident Review Panel Process' at Port and Group level**
-  **Enhancing and improving EHS audit, assurance and governance processes**






 Completed  In Progress  Under Development  Year 3 Delivery



LEARNING TOGETHER

Success in environment, health and safety (EHS) performance relies on every Peel Ports employee having the necessary knowledge, skills, information and competence to undertake their work safely. Learning individually and together is an essential aspect of our daily operations, sharing good and bad practices allows us to continually improve our performance.

This strategy theme will focus on delivering this through:

-  **Enhancing and improving EHS training matrices and develop standardised training packages across the group**
-  **Improving EHS investigations with a Peel Ports specific training course aligned to our SAP incident reporting system**
-  **Mobilising and effectively integrating EHS SAP across the Group**
-  **Creating innovative ways to standardise communication of EHS messages**
-  **Developing greater focus on 'near miss' and 'high potential controllable events' to prevent repeatable incidents**







 Completed  In Progress  Under Development  Year 3 Delivery



WORKING IN PARTNERSHIP

Contractors, suppliers, tenants and others are key to our business performance, they support us in delivering for our customers each day. Understanding the capabilities and competencies of our suppliers and contractors is essential for protecting our people and site infrastructure. Working in partnership with our unions and safety representatives will assist us in driving continual improvements in health, safety and environmental performance.

This strategy theme will focus on delivering this through:

-  **Creating a Safety Representatives Charter and establishing structure around Safety Rep/Representative of Employee Safety networks.**
-  **Strengthening union partnerships and encouraging greater collaboration in safety forums.**
-  **Integrating key suppliers and contractors through risk based screening and continued evaluation.**
-  **Working with external organisations to improve Port sector and wider industry benchmarking for EHS.**
-  **Developing tenant liaison forums to provide two-way process for discussing and driving improvement on EHS standards.**
-  **Identifying opportunities for closer links between landside and marine EHS to develop consistency and shared learning.**






 Completed  In Progress  Under Development  Year 3 Delivery



CARING FOR OUR ASSETS

Some of our greatest opportunities to minimise environmental, health and safety risk rests in the way we design, maintain, manage and upgrade our assets and equipment. Understanding our asset base, having effective maintenance strategies and designing out hazards and risks will help up to keep our operations safe and environmentally sound. A tidy and well-maintained site is key to having a safe site.

This strategy theme will focus on delivering this through:

-  **Producing risk based focussed asset management plans with short and long term targets.**
-  **Improving asset replacement strategies to reduce risk and improve efficiency.**
-  **Utilising output from EHS investigations to improve infrastructure design and layout.**
-  **Exploring the opportunities to roll out reliability centred maintenance (RCM) systems and processes to improve plant safety and performance.**
-  **Embedding effective 5s processes to ensure our assets remain clean and tidy and waste is minimised.**

 Completed  In Progress  Under Development  Year 3 Delivery



BEING PREPARED

The ability to respond & recover from an emergency is key to our preparedness. Having the necessary emergency plans, systems and training allows us to manage our business more effectively when an incident occurs. Keeping people safe is our number one priority, we also need to protect our assets and business reputation; being prepared helps us to do this effectively.

This strategy theme will focus on delivering this through:

-  Creating a crisis management framework for Peel Ports Group
-  Developing Group wide and port specific linked emergency plans for landside and marine
-  Establishing Business Continuity Policy, Procedures and processes
-  Delivering Business Continuity Plans at Group and Port level
-  Developing and Implementing a combined landside and marine exercise plan to test organisation resilience
-  Engaging with emergency response services and Local Resilience Forums to support preparedness







 Completed  In Progress  Under Development  Year 3 Delivery



PROTECTING HEALTH

Having effective management of occupational health is essential for our people and business. We must ensure we have systems in place to identify aspects of our operations that may impact on the health of individuals, this helps us to put the necessary controls in place to manage these risks effectively. Understanding our health and wellbeing at work helps us to perform at our best.

This strategy theme will focus on delivering this through:

-  Enhancing occupational health management guidelines and processes for work related ill health
-  Improving health surveillance and screening programmes through contracted support
-  Launching and streamlining data & reporting processes for occupational health with the introduction of Orchid
-  Improving occupational health & wellbeing through targeted education and support programmes
-  Implementing a mental health and wellbeing strategy & programme
-  Developing and deploying training resources to support managers and supervisors in health related strategies

 Completed  In Progress  Under Development  Year 3 Delivery



REDUCING OUR IMPACT

Understanding the impact our operations have on the environment and communities around us is essential in achieving our goal of being Net Zero by 2040. To achieve this, we must manage our operations to minimise emissions, reduce our reliance on natural resources and responsibly manage our infrastructure and operations.

This strategy theme will focus on delivering this through:

-  Establishing effective processes for managing resources & waste across Peel Ports Group
-  Creating a climate change impact plan for the Group and Port Clusters
-  Responsibly managing our drainage infrastructure and associated assets through targeted upgrades and planned maintenance
-  Introducing and delivering objectives linked to Peel Ports carbon reduction strategy
-  Enhancing amenity for our neighbours through targeted communications & improvement programmes
-  Developing, consulting on and implementing a sustainability strategy for Peel Ports Group

 Completed
  In Progress
  Under Development
  Year 3 Delivery



LEADING FOR SAFETY

Leadership and personal accountability play a vital role in the management of safety. Understanding the role we have to play within Peel Ports is essential in safely managing our operations each day, the way we act and interact with others is key to this. Being clear in our expectations and communicating these effectively will help us to continue on our journey towards zero harm.

This strategy theme will focus on delivering this through:

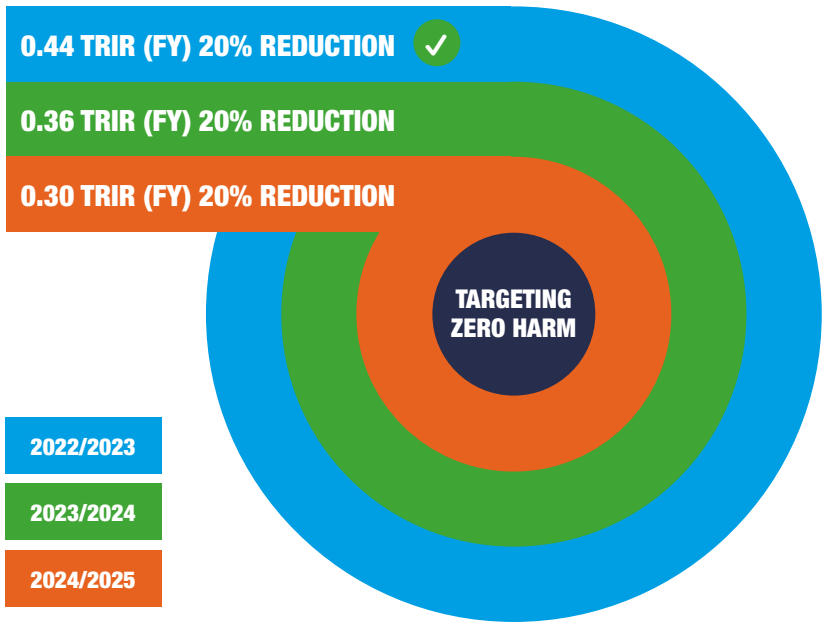
-  Continuing to deliver supervision and management soft skills training in partnership with STC INSISO (third party training provider)
-  Improving and enhancing the Visible Felt Leadership programme through continued training and the introduction of environment and security topics
-  Improving EHS data reporting at all levels in the organisation to ensure effective engagement with the whole workforce
-  Consulting on and implementing a 'Fair & Just' culture model and process
-  Updating, enhancing & refreshing Peel Ports Golden Rules

 Completed
  In Progress
  Under Development
  Year 3 Delivery

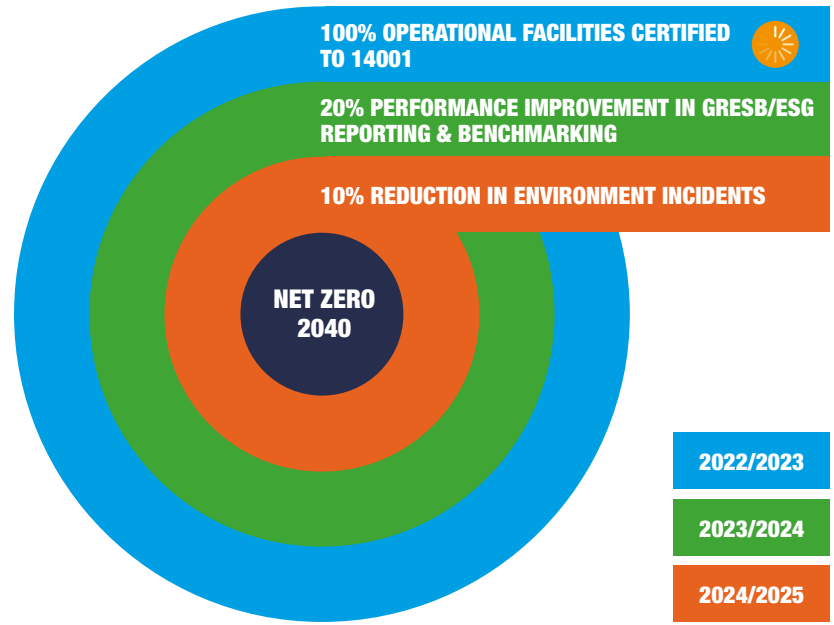
08. STRATEGY TARGETS

To understand the performance we are making against our new 3-year strategy it is important to set ourselves ambitious targets. Recognising the three important areas of environment, health and safety in these targets is key to delivering a successful strategy and plan. Included below are these targets, we will keep these under review and report our performance against them.

Our EHS Governance and Shareholder committees will be keeping track of our strategy delivery and performance and we will ensure we communicate this across the business through our managing responsibly meetings.



✓ Achieved ⚠ Partial Completion



✓ Achieved ⚠ Partial Completion

GRESB (Global Real Estate Sustainability Benchmark) ESG (Environment, Social and Governance)



09. Port Cluster Targets & Objectives for 2023/24

This section sets out the key strategic targets adopted by the Group Environment Health and Safety (EHS) Board and ESG Committee.

In support of the delivery of Peel Ports strategic goals, each port cluster is set a number of targets as set out below.

A key safety metric will continue to be Total Recordable Injury Rate (TRIR). This measure incorporates Lost Time Incidents (LTI), Restricted Workday Incidents (RWI) and Medical Treatment Incidents (MTIs).

$$\text{TRIR} = \frac{(\text{LTIs} + \text{RWIs} + \text{MTIs}) \times 100,000}{\text{Hours Worked}}$$

We multiply the total number of injuries by 100,000 hours because this is approximately the number of hours a typical employee would work in a lifetime and then divide by the calculated hours worked. So, a TRIR of 1.0 means that the rate of injury is equivalent to one for each worker during their career. It also helps us to benchmark ourselves against our peers and different industry sectors.

In 2023/24 our TRIR group frequency rate target will be set at 20% of 2022/23 target which was set at 0.44.

Peel Ports Group TRIR Target for 23/24= 0.36

We have also reflected on individual port performance across the year and have decided to set a TRIR objective which recognises our aspiration of being a zero-harm business, this can be seen in Table 1.

	Target Title	Owner	Due Date
Target 1	Deliver reduction (to 0.36) in Group Total Recordable Injury Frequency Rate	CEO	31st March 2024
Target 2	Business areas which fall behind the Group target at the end of the year will be required to attend the EHS Management Board to present an action plan for improvement.	Port Directors	31st March 2024
Target 3	Deliver business total recordable injury target (or less) (as per table 1)	COO/Port Directors/ Exec Team	31st March 2024

In Table 1 we have set individual business target to complement our Group TRIR target for 23/24 which is 0.36, these have been apportioned based upon head count. This will provide focus on each business area and links to the requirements of targets 1, 2 and 3 above.

Table 1: Individual Business TRIR Target

Port Cluster	TRI Target (FY) 23/24
Mersey	≤(3)
Clydeport	≤(2)
Containers	≤(5)
SE Cluster Ports	≤(2)
Peel Ports Logistics	≤(1)
Group Services	≤(1)

NB: The symbol ≤ refers to the target being less than or equal to.



Board Appointed Duty Holders

Peel Ports has established a comprehensive list of duty holders which cover a number of specific roles such as fire risk, asbestos and electrical safety etc. across the business, it is essential that these nominated roles are maintained across the ports.

	Target Title	Owner	Due Date
Target 4	Ensure board appointed duty holders are maintained up to date in line with Group Procedure 'PRC 030 PPG HSE'	Port Directors	Quarterly
Target 5	Deliver annual duty holder statements (Electrical/Fire/Asbestos) for each port cluster to the Board via the EHS EHS Management Board	Port Directors/ Chris Ingham	31st March 2024

ISO Standards and Certification

ISO (International Organisation for Standardisation) is an independent, non-governmental, organisation that develops documented standards for environmental management, health & safety management and quality management (among many other disciplines).

In 2022/23 the Port clusters added to their existing ISO accreditations by establishing accreditation at the following locations:

- Heysham (ISO 9001/14001/45001)
- Clydeport (Under Development - Delivery in 2023)
- Liverpool Containers (ISO 9001/14001/45001)

All accredited businesses will now undertake annual surveillance assessments to ensure continued accreditation

	Target Title	Owner	Due Date
Target 6	Each Port Cluster to ensure ISO certification is maintained through annual internal and external audits.	Port Directors	31st March 2024

Effective Audit Close-Out

The annual EHS audit cycle is an opportunity for the ports to be assessed internally by the Group EHS team, these audits target a selection of legal compliance and wider business compliance requirements. The findings from the audits are categorised as non-compliance, minor non-compliance, improvement opportunity or observation. It is essential that the ports act on these findings and close any identified gaps.

	Target Title	Owner	Due Date
Target 7	All Group EHS annual audit actions raised in the 2022/23 audits must be closed out or included in an improvement plan with defined timescales for delivery.	Port Directors	Sept 2023

Drugs and alcohol testing

The company is committed to promoting the health, safety and well-being of all employees by providing a safe and productive work environment. The aim of the Drugs and Alcohol Policy is to ensure that employees are aware of the risks associated with the use or misuse of drugs and alcohol and the potential consequences. Random testing of employees helps us to protect our workforce and business.

	Target Title	Owner	Due Date
Target 8	Ports will conduct random testing for drugs and alcohol in line with Group OH schedule for 23/24. This will equate to a minimum of 20% of the Groups workforce	Port Directors	March 2024
Target 9	On starting work at Peel Ports new employees will be screened for drugs	Wendy Freeman	March 2024

Visible Felt Leadership (VFL)

Undertaking VFL tours and engaging with our teams is an important part of our safety culture here at Peel Ports. Continuing to provide a focus on these across our Ports will enable us to improve our EHS performance and continue our journey towards zero harm.

	Target Title	Owner	Due Date
Target 10	Ensure supervision and management roles are trained to undertake VFL's and continue to complete these, including reviewing their output at Managing Responsibly Meetings.	Port Directors	March 2024

Regulatory Compliance

Peel Ports works hard to meet its legal requirements and, in many areas, looks to improve on and continually evolve working practices. Achieving no regulatory enforcement actions arising out of our port operations is key to our continued compliance and sector leading performance.

	Target Title	Owner	Due Date
Target 11	Deliver zero enforcement actions by health & safety and environmental regulators in the UK and Ireland	Claudio Veritiero	31st March 2024

Fair & Just Culture

Our Fair and Just Culture; is built on trust and transparency. It takes account of the interaction people have within their working environment. It enables an organisation and its workforce to improve systems, learn from incidents and accidents and accept when someone makes an 'honest mistake'.

	Target Title	Owner	Due Date
Target 12	Ensure the Fair and Just Culture Policy, Procedure and Booklet are issued to all new starters in the areas of the business which it has been launched.	Exec Team and Port Directors	March 2024
Target 13	Undertake a Fair & Just Culture assessment in accordance with the requirements of Group document PRC 330 PPG HSE Fair & Just Culture Guidance in areas of the business where the process has been launched.	Exec Team and Port Directors	March 2024



08. PRIORITISING & DELIVERING THE EHS STRATEGIC PLAN YEAR 2 2023/24

To ensure we meet our strategic ambitions for environment, health and safety we need continue to prioritise delivery of our plan as we move into year 2. Through consultation with the senior leadership team at group and port level in conjunction with the EHS Team we are progressing with our strategic plan which runs through to 2025. The strategic themes enable us to present a number of SMART objectives which will help us to deliver the plan.

Our Group priorities for 2023/24 are detailed in this section of the plan





CONTROLLING RISK

The management of risk is a continuous process and a fundamental cornerstone of all EHS management systems. We will make sure that before starting work we have identified the potential health, safety and environmental hazards and risks; selecting the control measures to put in place to reduce the potential for harm to people's health, safety and the environment.



Having good quality risk assessments is an essential part of any health & safety management system. Supporting our teams with the necessary skills and tools to create, manage and access these will ensure we continually evolve and improve these.

Strategic Deliverable

Improve and simplify risk assessment processes and systems.

	Target Title	Owner	Due Date
Target 14	Standardise risk assessment training and different requirements across the ports	Chris Ingham/EHS Managers	March 2024
Target 15	Improve, update and start to transfer the risk assessments from the existing risk assessment system into the newly developed system	Port Directors	March 2024
Target 16	Develop an improved process for ensuring risk assessments are routinely reviewed and updated in line with Group standards and that these are effectively communicated to the workforce	Port Directors	Dec 2024



Managing those higher risk activities on our sites is something we must focus on. Undertaking tasks which involve confined space, energy isolation, hot work are some examples of the areas we must have effective controls for. Ensuring our permit to work system evolves to meet the needs of the business is essential to delivering safe sites and operations.

Strategic Deliverable

Review the implementation of the New Group Permit system (Authorisation to Work (ATW) & Permit to Work (PTW)).

	Target Title	Owner	Due Date
Target 17	Review the implementation of the new ATW/PTW system to ensure it meets business needs	John Loughran	Dec 2023
Target 18	Incorporate PTW in Group EHS audit programme	John Loughran	March 2024
Target 19	Create a dashboard to evaluate PTW usage across the business and review trends	John Loughran	March 2024



Our Policies, procedures, information and guidance ensure we operate within the legal framework. Ensuring these documents are clear, unambiguous and easily accessed is key to delivering safe and environmentally sound operations.

Strategic Deliverable

Create and embed Policy, Procedure, Information and Guidance for EHS.

	Target Title	Owner	Due Date
Target 20	Continue to update, review and standardise existing Group EHS policy, procedure and processes.	Chris Ingham	March 2024
Target 21	Review the Group EHS legal register quarterly to identify any legal changes which require new or updated policy or procedures	Sophie Farrell/Chris Ingham	Quarterly



Keeping track of our performance through regular assessments helps us to understand our level of compliance. Providing tools and a framework ensures we assess our operations in the same way. Measuring and reporting on the output from audits will help us to continually improve.

Strategic Deliverable

Enhance and improve EHS audit, assurance and governance processes.

	Target Title	Owner	Due Date
Target 22	Issue an Annual Assurance plan for FY 23/24 covering Level 1, 2 audits	Sophie Farrell	April 2023
Target 23	Create a monthly reporting dashboard to track assurance plan delivery for the EHS Management Board	Sophie Farrell	May 2023
Target 24	Hold quarterly assurance plan meetings with the EHS Managers to review performance of the audits and plan delivery	Sophie Farrell/EHS Managers	Quarterly
Target 25	Review the output from the annual assurance plan to determine Group EHS Level 3 audit requirements for 23/24	Sophie Farrell	Dec 2023
Target 26	Provide an end of year report on annual assurance activities for presenting to the EHS Management Board and ESG Committee	Sophie Farrell	March 2024



Having an effective EHS Management System in place to enable the workforce to be able to easily access the latest documents in one place every time, ensures the business operates consistently and in compliance.

Strategic Deliverable

Enhance and Improve the Incident Review Panel (IRP) Process at Port and Group level

	Target Title	Owner	Due Date
Target 27	Hold quarterly Incident review Panels at Group level and provide a report on the outcome to the EHS Management Board and ESG Committee	Chris Ingham	Quarterly
Target 28	Port Clusters to hold their own monthly Incident Reviews panels to drive improvements in accident, incident and near miss investigations and outcomes	Port Directors/EHS Managers	Monthly



LEARNING TOGETHER

Success in EHS performance relies on every Peel Ports employee having the necessary knowledge, skills, information and competence to undertake their work safely. Learning individually and together is an essential aspect of our daily operations, sharing good and bad practices allows us to continually improve our performance.



Having knowledgeable and competent people helps us to deliver safe operations. Providing a matrix which clearly establishes the minimum standards and focusses on the training needs gives reassurance that personnel are prepared for each working day.

Strategic Deliverable

Create Learning and Development Steering and Working Groups to review, evaluate and report on business compliance

	Target Title	Owner	Due Date
Target 29	Create Terms of Reference and Workplan for 23/24 for the L&D steering group.	Rachel Smith	May 2023
Target 30	Evaluate training delivery and training needs quarterly and provide a report on business performance to the EHS Management Board	Rachel Smith	Quarterly
Target 31	Create improved and enhanced dashboards to support the business and management teams in effectively managing training needs	Rachel Smith	Dec 2023



Understanding the messages, we receive either in written or verbal communications provides us with the knowledge that we need to work effectively each day. Ensuring the information is targeted, clear and timely enables us to understand and react to the messages which we are receiving.

Strategic Deliverable

Create innovative ways to standardise communication of EHS messages.

	Target Title	Owner	Due Date
Target 32	Create EHS communications plan and publish this for 2023/24	Victoria Stanley	April 2023
Target 33	Undertake two pulse surveys within the year to measure effectiveness of EHS communications	Victoria Stanley	Nov 2023 and March 2024
Target 34	Explore the 'Heads Up' functionality in i-Auditor for creating more engaging EHS communication content, such as short videos and interactive content	Victoria Stanley	July 2023



When an incident occurs, we must ensure we investigate it thoroughly and capture the information necessary to prevent a repeat event. Understanding why the incident occurred, provides valuable information which we can learn from.

Strategic Deliverable

Continue to improve the quality of EHS investigations

	Target Title	Owner	Due Date
Target 35	Train and coach new and existing managers in investigation techniques to ensure continued improvement in investigation quality	Port Directors/EHS Managers	March 2024
Target 36	Identify key learnings from incident investigations and create lessons learnt for sharing across business as appropriate.	EHS Managers/	March 2024



The way we report and investigate our incidents ensures we are a learning organisation and can implement changes to prevent repeat incidents. Integrating EHS SAP into the business allows us to do this and helps inform us via data and dashboards measure our performance.

Strategic Deliverable

Continue to embed EHS SAP Incident Management across the Group.

	Target Title	Owner	Due Date
Target 37	Evolve dashboard reporting to improve business wide engagement on observation, incident, event and near miss data.	Sophie Farrell	March 2024



When an incident or accident almost happens, we often react by saying 'that was close', at another time or place the next person may not be as lucky. This is the reason why we must investigate 'near miss' and 'high potential controllable events'. The learning from these incidents is essential in preventing a repeat event.

Strategic Deliverable

Develop greater focus on 'near miss' and 'high potential controllable events' to prevent repeatable incidents.

	Target Title	Owner	Due Date
Target 38	Improve the reporting and recording of near miss incidents across the Group by a minimum of 15% based on 22/23 baseline	Port Directors/ EHS Managers	March 2024
Target 39	Group EHS to review near miss/high potential controllable event reports and identify those requiring presentation to EHS Management Board	Group EHS	March 2024
Target 40	Create Lessons Learnt based on near miss/high potential controllable events for sharing across the business and industry as and when required	EHS Managers/ Group EHS	March 2024



WORKING IN PARTNERSHIP

Contractors, suppliers, tenants and others are key to our business performance, they support us in delivering for our customers each day. Understanding the capabilities and competencies of our supplier and contractors is essential for protecting our people and site infrastructure. Working in partnership with our unions and safety representatives will assist us in driving continual improvements in health, safety and environmental performance.



You can never have enough people focussed on health and safety, which is why it is essential to work closely with those individuals who represent the workforce on these matters. Creating effective networks to facilitate workplace inspections, support investigations and promote safety is a key component of any workplace.

Strategic Deliverable

Creating a Safety Representatives Charter and establishing structure around Safety Rep/Representative of Employee Safety networks.

	Target Title	Owner	Due Date
Target 41	Provide NEBOSH General Certificate training to Safety Reps/RES who request it as part of the Safety Reps Charter	Port Directors	May 2023
Target 42	Establish the Safety Rep/RES safety walk and reward system for those who currently hold NEBOSH General Certificates	Group EHS/ Group HR	May 2023
Target 43	Hold an annual Safety Reps/RES briefing day	Group EHS/ COO/Port Directors	Oct 2023
Target 44	Establish Peel Ports Rep/RES email addresses to enable effective communication of new EHS materials and creation of a forum for sharing information.	Group IT	May 2023



Having strong partnerships is key to being successful when it comes to environment, health and safety performance. Working towards common goals through union participation helps us to develop and improve our safety culture.

Strategic Deliverable

Strengthen union partnership and encourage greater collaboration in safety forums.

	Target Title	Owner	Due Date
Target 45	National Unite Officer to be invited to attend Peel Ports EHS Governance Committee Quarterly	CEO/Chris Ingham	Quarterly
Target 46	Continue to support union engagement days and forums	COO/Chris Ingham	March 2024



Our port operations extend beyond our sites and boundaries into the waterways we have statutory duties for. It is important from an environment, health and safety perspective to work closely together when undertaking landside or marine operations. Sharing information, learning from incidents and aligning processes is something we can develop further in our journey towards zero harm.

Strategic Deliverable

Identify opportunities for closer links between landside and marine EHS to develop consistency and shared learning.

	Target Title	Owner	Due Date
Target 47	Group EHS Director and Group Harbour Master to hold quarterly meetings to discuss consistency across marine and landside EHS activities	Group EHS and Group Marine	Quarterly
Target 48	Improve quayside safety through the introduction of a new working group	Group EHS and Group Marine	March 2024
Target 49	Take output from the working group and commence roll out consistently across Peel Ports	Group EHS and Group Marine	March 2024



Our contractors and suppliers help to support us in delivering for our customers day to day. The way we interact with them and ensure they meet our environment, health and safety requirements is key to keeping everyone safe whilst working at our ports. Our understanding of their safety systems, training, insurance and other business requirements helps us to achieve safe day to day operations.

Strategic Deliverable

Integrate key suppliers and contractors through risk based screening and continued evaluation

	Target Title	Owner	Due Date
Target 50	To create a system and documented process which provides visibility across the ports of Peel Ports contractors & suppliers	James Riddick	March 2024
Target 51	Revise and enhance the process for onboarding new contractors and suppliers	James Riddick	March 2024
Target 52	Provide a platform for evaluating EHS performance of contractors and suppliers to ensure continued compliance with business processes	James Riddick	March 2024
Target 53	Create a training package to support the effective implementation of the new system and process for contractors & suppliers	James Riddick	March 2024





CARING FOR OUR ASSETS

Some of our greatest opportunities to minimise environmental, health and safety risk rests in the way we design, maintain, manage and upgrade our assets and equipment. Understanding our asset base, having effective maintenance strategies and designing out hazards and risks will help up to keep our operations safe and environmentally sound. A tidy and well-maintained site is key to having a safe site.



To continue to deliver our port operations we have a large number of fixed and mobile assets, these vary in type and age and require proactive management to maintain business performance and continual improvement.

Strategic Deliverable

Review CAPEX programmes to ensure EHS risk items are prioritised for delivery

	Target Title	Owner	Due Date
Target 54	Ensure EHS related CAPEX programmes are proactively managed and prioritised for delivery	John McCormack/ Port Directors	March 2024
Target 55	Undertake quarterly reviews and provide feedback on delivery at the managing responsibly meetings	John McCormack/ John Loughran	Quarterly
Target 56	Create an annual delivery summary for the EHS linked CAPEX programme	John McCormack/ John Loughran	March 2024



Investigating incidents thoroughly is part of good EHS management. Taking the output from investigations to improve the layout and infrastructure is something we must focus on creating improvements where a need is identified.

Strategic Deliverable

Improve asset replacement and maintenance strategies to reduce risk and improve efficiency

	Target Title	Owner	Due Date
Target 57	Create, consult on and issue an asset replacement & maintenance strategy for each port to ensure continued visibility of programmed and completed works	Port Directors/ Heads of Engineering	March 2024
Target 58	Procurement function to ensure suppliers continue to meet business needs through assessing their contractual compliance (Health Check)	James Riddick	March 2024
Target 59	Embed asset lifecycle into focussed asset management and maintenance plans	Heads of Engineering	March 2024



Keeping our sites tidy is an important aspect of our safety culture, it prevents incidents and accidents from occurring through poor housekeeping. It also improves our productivity as we always know where something is when we need it and ensures we have the right tools for the job.

Strategic Deliverable

Embed effective 5s processes to ensure our assets remain clean and tidy and waste is minimised

	Target Title	Owner	Due Date
Target 60	Review current 5S implementation across the group and ports to determine baseline	Port Directors/ EHS Managers	June 2023
Target 61	Create, consult on and issue procedures and processes to standardise approach to 5S across the group	Group EHS	Oct 2023
Target 62	Carry out training to support delivery of 5S approach across the business	Group EHS	March 2024



Effectively managing our asset base to ensure we maintain high levels of safety and environmental compliance when we look to replace or upgrade plant and equipment will help us to meet our zero harm and net zero ambitions.

Strategic Deliverable

Improve asset replacement and maintenance strategies to reduce risk and improve efficiency

	Target Title	Owner	Due Date
Target 63	Create a new Group standard for the procurement of energy efficient equipment and plant	James Riddick/ Malcolm Oliver-White	March 2024
Target 64	Work with suppliers to identify innovative new technologies which can help us achieve our zero harm ambitions	James Riddick/ Malcolm Oliver-White	March 2024





BEING PREPARED

The ability to respond and recover from an emergency is key to our preparedness. Having the necessary emergency plans, systems and training allows us to manage our business more effectively when an incident occurs. Keeping people safe is our number one priority, we also need to protect our assets and business reputation; being prepared helps us to do this effectively.



Responding to incidents is something we do routinely, fortunately many of these incidents are minor and create minimal disruption. As a Port operator we also need to be prepared to respond and recover from incidents which will have a greater impact on our operations.

Strategic Deliverable

Create a crisis management framework for Peel Ports Group

	Target Title	Owner	Due Date
Target 65	Take the recommendations from independent gap analysis and review completed in Feb 2023. Establish a working group to determine a plan for delivery	Chris Ingham	April 2023
Target 66	Develop, consult on and issue a Group Crisis Management Plan	Group EHS/ Group Harbour Master/COO	March 2024
Target 67	Provide training to the Executive team and Port Directors on the Group crisis management plan and corporate response arrangements	Group EHS/ Group Harbour Master/ COO	March 2024

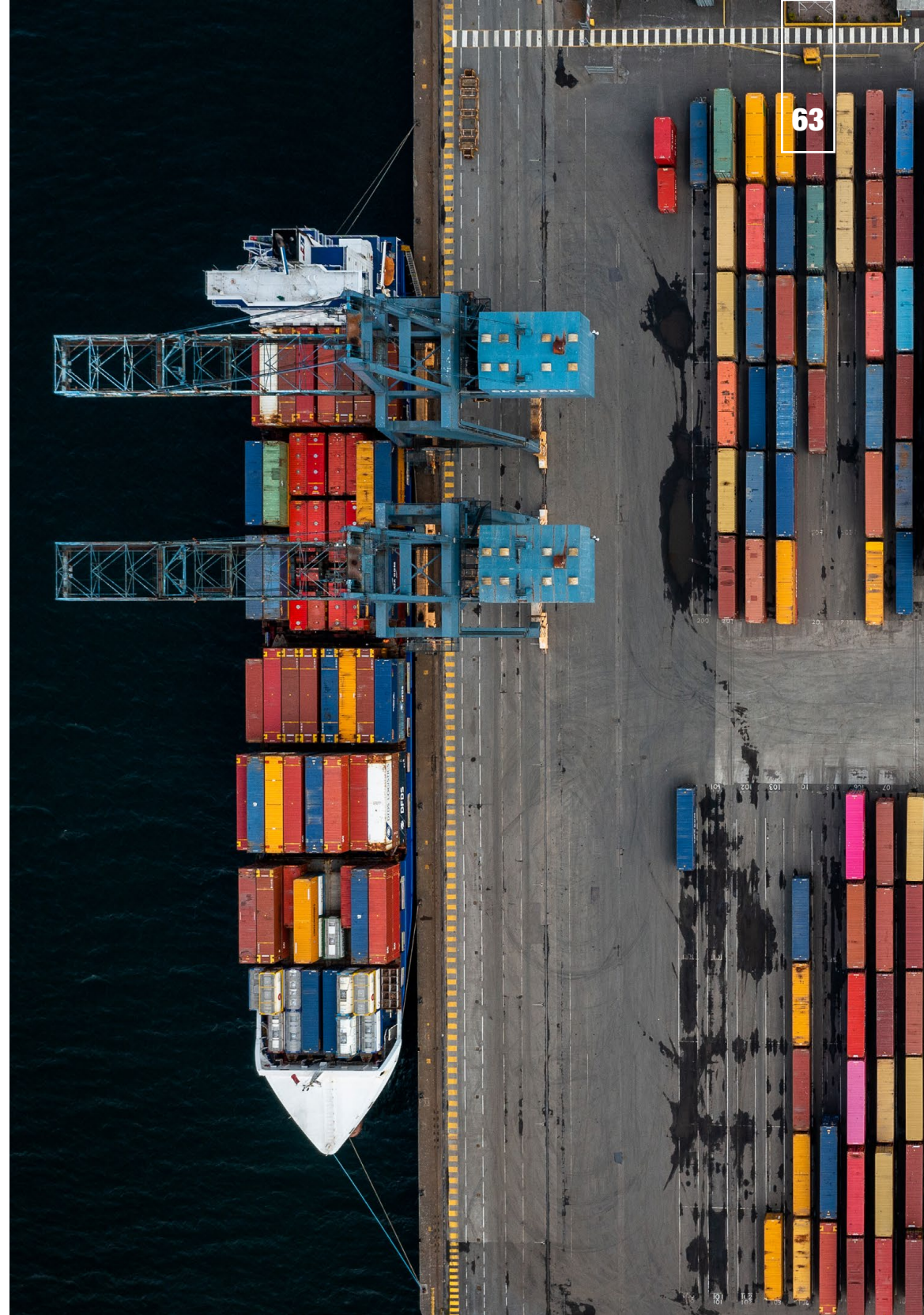


Understanding how our teams and plans work together to deliver an effective emergency response is critical for ensuring we effectively respond and recover from incidents which may occur within our ports.

Strategic Deliverable

Develop Group wide and port specific linked emergency plans for landside and marine.

	Target Title	Owner	Due Date
Target 68	Create, consult on and issue common standard templates for emergency plans	Group EHS	Dec2023
Target 69	Port teams to work on developing and enhancing their own emergency plans combining landside and marine arrangements	Port Directors/ Marine Teams	March 2024





PROTECTING HEALTH

Having effective management of occupational health is essential for our people and business. We must ensure we have systems in place to identify aspects of our operations that may impact on the health of individuals, this helps us to put the necessary controls in place to manage these risks effectively. Understanding our health and wellbeing at work helps us to perform at our best.



Supporting people when they are affected by work related ill health is key to preventing long term absence. Working together to help safely manage the needs of the individual when they return to the workplace can improve their recovery, the management teams in conjunction with occupational health are an essential part of this process.

Strategic Deliverable

Embed occupational health management guidelines and processes for work related ill health.

	Target Title	Owner	Due Date
Target 70	Supervisors and managers to be provided with occupational health management guidelines and processes through updates and training.	Wendy Freeman	March 2024



Careful management of occupational health data allows us to understand the health of our workforce and provide an appropriate level of health screening and health surveillance. Retaining these records securely in line with GDPR requirements remains our responsibility.

Strategic Deliverable

Launch and streamline data & reporting processes for Occupational Health with the introduction of Orchid.

	Target Title	Owner	Due Date
Target 71	Implement Orchid occupational health module into the business through the accurate transfer of records in line with GDPR	Wendy Freeman	July 2023
Target 72	Provide specific work related training on Orchid to the OH team and identified managers	Wendy Freeman	March 2024



We all spend a lot of time at work which enables a business to develop educational programmes focussed on people's health and wellbeing. Combining our knowledge and experience we can provide supporting programmes which are readily accessible to our workforce.

Strategic Deliverable

Implement a mental health and wellbeing strategy programme.

	Target Title	Owner	Due Date
Target 73	Provide internal information/training for managers and new starters on the mental health and wellbeing strategy and support programme.	Wendy Freeman	March 2024



Understanding the health of our workforce when they join Peel Ports and then during their work for us is something we need to do. Working with partner organisations who have experts in this field allow us the flexibility to meet the demands of our business as people join and leave us.

Strategic Deliverable

Improve health surveillance and screening programmes.

	Target Title	Owner	Due Date
Target 74	Ensure all new employees which are notified to OH have completed a pre-placement questionnaire and D&A testing on entry into the business.	HR/Wendy Freeman	March 2024
Target 75	Ensure new starters requiring pre-placement assessments receive these before medical clearance can be given to undertake their role.	HR/Wendy Freeman	March 2024
Target 76	Ensure 95% of health surveillance and 95% of health screening is achieved in the year	Wendy Freeman	March 2024

Strategic Deliverable

Improve occupational health and wellbeing through targeted education and support programmes

	Target Title	Owner	Due Date
Target 77	Publish the plan and commence delivery of the programme on a priority led basis	Wendy Freeman	Apr 2023





REDUCING OUR IMPACT

Understanding the impact our operations have on the environment and communities around us is essential in achieving our goal of being Net Zero by 2040. To achieve this, we must manage our operations to minimise emissions, reduce the use of natural resources and responsibly manage our infrastructure and operations.



Delivering a sustainable business and operation is something we must do, as a user of energy and resources we have a duty to understand the impact of our operations and work to minimise our impact.

Strategic Deliverable

Monitor and measure the implementation of the sustainability strategy for Peel Ports group.

	Target Title	Owner	Due Date
Target 78	Develop ESG reporting framework aligned to strategic deliverables for internal and external communication	Lewis McIntyre	June 2023
Target 79	Provide an annual report on progress against the sustainability strategy targets	Lewis McIntyre	March 2024



Announcing our net zero commitments in 2021 provides us with a target to meet by 2040, understanding the operations we carry out daily and creating carbon reduction strategy will provide the roadmap to our success.

Strategic Deliverable

Monitor delivery of the objectives linked to our carbon reduction strategy.

	Target Title	Owner	Due Date
Target 80	Taking our baseline emissions from 2020, track our carbon reduction targets aligned to our direct influenced 'Scope 1 and 2' emissions	Shaun McKenna	June 2023
Target 81	Measure 'Scope 3' emissions and set a target to reduce these by 2024.	Shaun McKenna	Sept 2023
Target 82	Produce an annual summary of our emission reductions for inclusion in the annual sustainability report and include in corporate newsletters.	Shaun McKenna	March 2024
Target 83	Implement a strategy to ensure all new buildings have a EPC rating of B and create a plan to ensure all existing buildings have a rating of C by 2028	Mark Robinson/ John McCormack	March 2024



Our operations utilise resources and create waste, we can minimise the use of materials if we understand the amount we use. Reducing our inputs have a direct impact on the quantity of waste materials we will produce. Utilising the waste hierarchy helps us to ensure that the waste we produce is re-used or recycled and that we minimise disposal.

Strategic Deliverable

Establish effective processes for managing resources & waste across Peel Ports Group.

	Target Title	Owner	Due Date
Target 84	Measure waste quantities across all business areas and create a performance target for waste reduction, re-use & recycling	James Riddick/John Loughran	July 2023
Target 85	Provide EHS Board reports updates on progress against reduction targets.	John Loughran	Dec 2023



The changes we are seeing to our climate globally is something we need to consider as we plan for the future. By their very nature Port operations are adjacent to the sea and can be impacted by rising tides and extremes of weather. It is important for us to consider these changes as we develop our business plans.

Strategic Deliverable

Implement climate change impact plans for Group and Port Clusters.

	Target Title	Owner	Due Date
Target 86	Produce 3 port cluster climate adaptation plans	Shaun McKenna	Dec 2023
Target 87	Implement and track the recommendations within the 3 port cluster climate change impact plans including the programme of upgrade to existing infrastructure and assets	Port Directors/ John McCormack	March 2024

We have a large asset base to manage above and below ground, understanding the way in which our drainage systems work and ensure they are properly maintained ensures we can continue with our operations whilst protecting the environment.

Strategic Deliverable

Responsibly manage our drainage infrastructure and associated assets through targeted upgrades and planned maintenance.

	Target Title	Owner	Due Date
Target 88	Ensure drainage maintenance requirements are integrated into SAP EAM for all sites	Heads of Engineering	Dec 2023



Ensuring our operations minimise impact on our neighbours and create benefits to the localities in which we operate is an essential component of our ESG Strategy. Working together to achieve this through improved engagement and enhancement programmes will help us to achieve this.

Strategic Deliverable

Enhance amenity for our neighbours through targeted communications & improvement programmes

	Target Title	Owner	Due Date
Target 89	Embed through the use of training materials the management of nuisance complaints (reporting, investigating, actions, feedback)	John Loughran/ Port Directors	Sept 2023
Target 90	Create a port cluster communications strategy and approach to engaging with community forums and local stakeholders	John Loughran/ Port Directors	March 2024



LEADING FOR SAFETY

Leadership and personal accountability play a vital role in the management of safety. Understanding the role we have to play within Peel Ports is essential in safely managing our operations each day, the way we act and interact with others is key to this. Being clear in our expectations and communicating these effectively will help us to continue on our journey towards zero harm.



Investing in our people is essential to developing our workforce. Our teams, supervisors, managers and leaders all have a key role to play in developing our safety culture. Understanding the way we work and how the job, the individual and the organisation have a role to play in this, is aligned to the HSE's Human Factors model and remains a focus for the training and upskilling we deliver.

Strategic Deliverable

Deliver the new 'Behavioural Safety' training programme (Safety & Me 123)

	Target Title	Owner	Due Date
Target 91	Create the Safety & Me 123 programme content and the delivery plan	Chris Ingham	March 2024
Target 92	Undertake train the trainer sessions in conjunction with STC INSISO to enable the business to self-deploy the programme in a phased approach	Chris Ingham	March 2024



Peel Ports have a well-established system for Visible Felt Leadership (VFL) tours, this enable the organisation to show leadership for health and safety and creates a culture of two way dialogue for continual improvement.

Strategic Deliverable

Improve Visible Felt Leadership (VFL) programme through continued training and introduction of Environment and Security topics.

	Target Title	Owner	Due Date
Target 93	Review the existing platform for VFL and incorporate enhancements and improvements in functionality	Group EHS	March 2024
Target 94	Create refresher briefing content for current VFL population on the changes to VFL	Group EHS	March 2024
Target 95	Improve reporting of VFL outputs through EHS Dashboard review and wider data analysis across peel ports	Group EHS	March 2024



A 'Fair & Just' culture recognises that there will be situations where safety actions and performance fall below expectations, this can be related to a lapse in concentration or a more deliberate act. Implementing a model which provide a managed process for dealing with these issues in a fair and transparent way helps us to understand human behaviour in incident investigations.

Strategic Deliverable

Review the effectiveness of the new 'Fair & Just' culture model and process.

	Target Title	Owner	Due Date
Target 96	Ensure Fair & Just culture is included in the onboarding process for all new employees in the areas it has been deployed	Group HR	June 2023
Target 97	Review the effectiveness of the Fair & Just culture model 6 months post implementation in the areas it has been deployed	Group EHS	March 2024



Our safety health and safety behaviours and golden rules help us to convey our culture consistently across the organisation. They help us frame our expectations for employees, contractors, third party labour and all other visitors to our sites. They are a key part of our EHS branding.

Strategic Deliverable

Update, enhance & refresh Peel Ports Golden Rules

	Target Title	Owner	Due Date
Target 98	Review current 365 branding and materials by establishing a cross business working group	Group EHS/ Group Marketing	Dec 2023
Target 99	Taking the output from the working group create updated materials and content to support re-launch in 24/25	Group EHS/ Group Marketing	Mar 2024



APPENDIX I

GLOSSARY OF TERMS

INJURY REPORTING

Total Recordable Injury Rate (TRIR):

A key safety metric which incorporates Lost Time Incident (LTI), Restricted Workday Incident (RWI) and Medical Treatment Incident (MTI) and divides these by working hours to create a frequency rate. To ensure we are able to utilise this for benchmarking purposes we factor this to 100,000 work hours.

Total Recordable Incident (TRI):

An incident which includes any lost time (LTI), a restriction (RWI) or requires medical treatment.

INJURY CATEGORISATION

Total Recordable Injury Rate (TRIR):

All incidents should be recorded once, in the highest appropriate category (see below).

Lost Time Incident (LTI)	An incident that prevents normal and amended duties from being performed for the whole of a future rostered shift.
Restricted Workday Incident (RWI)	An incident that prevents normal duties from being performed on the next rostered shift however the employee is fit for (and given) amended duties.
Medical Treatment Incident (MTI)	An incident requiring treatment beyond the competency of a first aider (e.g. from a doctor, nurse or dentist). Note that a precautionary visit to hospital (including x-ray or scan) does NOT trigger an MTI classification unless additional medical treatment (e.g. stitches) is required.
First Aid Incident (FAI):	An incident requiring treatment by a first aider only.

Minor Injury (MI):	A minor injury that does not require first aid or other treatment e.g. minor cut, bruise or graze.
Non Work Related (NWR):	An incident which has occurred but is not out of or in connection with the work activity. NB An accident is work related if any of the following played a significant role: the way the work was carried out, any machinery, plant, substance or equipment used for the work or the condition of the site or premises where the accident happened.
Road Traffic Incident (RTI)	A road traffic collision on site which cause injury (injury categorisations must be recorded in EHS SAP as the same as the injury categories of LTI, RWI etc.
Road Traffic Incident Non Work Related (RTI-NWR)	A road traffic collision which has occurred but is not out of or in connection with the work activity or occurs on the public highway.
High Potential Controllable Event (HPCE)	Any type of event that could, in any other circumstances, have realistically resulted in a fatality, multiple fatalities or serious injury. It also includes those events where significant damage could have been caused to the environment and fixed or mobile assets and whereby the reputation and security of the business may have been compromised.
Spill:	Unintentional release of a commodity or chemical from its primary containment.

Separately from the five injury classifications above, there are parallel definitions and statutory reporting obligations arising from the RIDDOR Regulations 2013:

RIDDOR Reportable Injury	<ol style="list-style-type: none"> 1. An injury that results in an employee being away from work, or unable to perform their normal work duties, for more than seven consecutive days. This period does not include the day of the incident but does include weekends and rest days. A report of the incident must be submitted to the Health and Safety Executive (HSE) within 15 days. 2. One of the "Specified Injuries" described in the regulations that must also be reported to the HSE regardless of any absence period.
RIDDOR Dangerous Occurrence	An incident falling within one of the 27 'Dangerous Occurrences' described in the regulations. Reports of such incidents must be made immediately by the quickest practicable means and followed up by a written notification within 10 days.
RIDDOR Reportable Diseases	One of the specified "Reportable Diseases" described in the regulations linked to occupational exposure to specified hazards. Reports must be made by the quickest practicable means and followed up by a written notification within 10 days.

APPENDIX II

GROUP ENVIRONMENTAL POLICY

ENVIRONMENTAL POLICY



Peel Ports Group operates as a statutory and competent harbour authority, licensing authority, port operator and a landowner in numerous locations around the UK and Ireland.

Government policy requires harbour authorities to strike an appropriate balance between long term protection of the environment and securing of sustainable economic growth.

In discharging its duties the Peel Ports Group will be committed to manage its obligations to the environment in a responsible manner and to develop its business to meet the needs of our customers in a manner which has due regard to sustainable development both for its business and the environment.

It is the policy of Peel Ports Group to:

- Comply with environmental legislation and other compliance obligations that relate to our business
- protect the environment from negative impacts including pollution and contamination;
- follow best environmental practice when conducting business and managing the Group's estate;
- maintain a high level of preparedness and respond in an appropriate and timely manner to any incident or emergency that may impact on the environment;
- ensure staff and contractors are given appropriate environmental information and training;
- minimise any significant adverse environmental impacts of new developments and work towards sustainable development;
- ensure environmental and sustainability considerations are given to purchasing decision-making and opportunities are taken to buy items having fewer environmental impacts;
- consider environmental and sustainability criteria when assessing and pre-qualifying suppliers and proactively managing suppliers' performance;
- reduce waste and follow the waste hierarchy, seeking opportunities to minimise the use of landfill;
- maintain communication with relevant regulators and authorities where there are common environmental interests;
- prepare, publish and monitor environmental objectives and targets with the aim of continual improvement;
- regularly assess and plan for impact of climate change;
- work towards achieving Net Zero in greenhouse gas emissions by 2040, by developing a route to reduce emissions and decarbonise;
- enforce the responsible management of environmental impacts among our tenants when they have the potential to affect our environmental obligations;
- communicate with employees, stakeholders and port users on environmental matters;
- promote a positive culture and attitude in relation to environmental matters, with the objective to conserve and enhance the environment

This policy applies to Peel Ports Group employees and contractors. It is the responsibility of employees to adhere to business environmental procedures, guidance and instructions.

This policy will be reviewed at annual intervals.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX III

GROUP HEALTH, SAFETY AND WELFARE POLICY

HEALTH, SAFETY AND WELFARE POLICY



Peel Ports Group operates as a statutory and competent harbour authority, licensing authority, port operator and a landowner in numerous locations around the UK and Ireland.

Peel Ports Group considers that the interests of the Group and its employees are best served by a positive and committed approach to Health, Safety and Welfare management. This approach will help to prevent work related injuries and ill health whilst also helping to ensure the continuing prosperity of the Group and its employees.

The Group recognises and accepts its responsibilities under the Health and Safety at Work Act 1974 and is fully committed to delivering on these responsibilities.

The Group is committed to creating robust Health, Safety and Welfare management systems offering protection to all parties who may be directly or indirectly affected by our operations. To assist us in fulfilling these objectives the Group requires that all parties identify workplace hazards ensuring that they are appropriately mitigated. Where workplace hazards have the potential to affect the health of our employees, we will conduct such health surveillance and screening as may be necessary to verify that our controls are effective.

It is the policy of Peel Ports Group to:

- Prioritise Health, Safety and Welfare matters during the decision making process and to promote good practice in the planning and execution of all work related activities;
- consult with employees on Health, Safety and Welfare matters, and in particular in the development and review of safe systems of work;
- provide and maintain appropriate PPE and welfare facilities for all port users;
- provide information, instruction and training regarding workplace hazards along with the mitigations available to control and eliminate them. Employees must execute tasks in compliance with statutory provisions and the Group's policies and procedures in such a way as to minimise the risk of injury and ill health;
- expect employees, contractors and visitors to comply with the Group's requirements in relation to Health, Safety and Welfare matters;
- commit to continuous improvement in Health, Safety and Welfare management and deliver these goals by setting plans, objectives and targets;
- monitor our systems which will be regularly audited to verify compliance and adherence to Group policies.

This Policy Statement applies to every employee and contractor of the Group. You should make yourself fully aware of its content, adhere to it at all times and support its implementation.

This policy will be reviewed at annual intervals.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX IV GROUP QUALITY POLICY

QUALITY POLICY



Peel Ports Group operates as a statutory and competent harbour authority, licensing authority, port operator and a landowner in numerous locations around the UK and Ireland.

We are committed to providing quality logistics and port services for our customers. This commitment is driven by our approach based on engagement, collaboration and innovation.

It is the policy of the Peel Ports Group to maintain a quality system designed to meet the requirements of ISO 9001:2015 in pursuit of its primary objectives and the context of the organisation.

It is the policy of Peel Ports Group to:

- Understand our customers' expectations and strive to satisfy these in the safest and most economic and sustainable way;
- monitor, measure and utilise customer feedback to understand market needs and trends and to improve customer satisfaction;
- achieve and maintain compliance with legal and other requirements and appropriate standards including contracted work carried out on our behalf;
- follow structured business processes which are documented in a management system in order to reach and sustain high quality standards;
- provide appropriate information, training and support to all staff to allow them to meet our quality objectives;
- regularly review the management system, the performance of the processes, the setting of quality targets and achievement of objectives and providing the resources essential to maintain and improve the management system

This quality policy provides a framework for setting, monitoring, reviewing and achieving our objectives, programmes and targets.

To ensure the company maintains its awareness for continuous improvement, the quality system will be regularly reviewed by the senior management team to ensure it remains appropriate to our business. The quality system will be subject to regular audits.

Peel Ports is committed to ensuring that this policy is implemented in line with legislation, regulations and codes of practice, by all employees.

This policy will be reviewed at annual intervals.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX V

GROUP PORT MARINE SAFETY CODE POLICY

PORT MARINE SAFETY CODE (PMSC) POLICY



Peel Ports Group operates as a statutory and competent harbour authority, licensing authority, port operator and a landowner in numerous locations around the UK and Ireland.

The Group Harbour Master, as the senior marine professional, understands the statutory and common law duties which includes an obligation to conserve and facilitate the safe use of our harbours, and has an express duty to take such action as each harbour authority considers necessary for maintenance, operation, improvement or conservancy of harbours.

To that end, the Group Harbour Master is the custodian of the Group Marine Safety Management System, which details how marine operations are to be conducted safely in our ports. Where appropriate, consultations take place with all those who work in and use the harbours to ensure that they are fully involved in the preparation of the Group Marine Safety Management System, marine policies and procedures.

Full and comprehensive risk assessments are undertaken in respect of all activities and facilities within the harbours leading to the development of the Group Marine Safety Management System. Protection of the environment is recognised by general and specific duties and the Group Marine Safety Management System exercises functions in a manner, which has regard to nature conservation and environmental considerations.

The Port Director of each of the Peel Ports Group statutory authorities are the Duty Holders for the purposes of the Port Marine Safety Code and individually accept responsibility for ensuring that the relevant harbour authority of which they are director, discharges its duties in accordance with the Port Marine Safety Code. They have responsibility and accountability for delivering the respective harbour authority's powers in relation to marine operations and harbour undertakings within their control, through the application of the Group Safety Management System; the Port Directors of the respective ports are responsible for the operational and financial control of each of the harbour authorities. The Port Directors, as Duty Holders, are committed to undertaking and regulating maritime operations, through the operation of the Group Marine Safety Management System, in a way that safeguards their users, the public, the environment and their harbours.

The Port Directors are advised on all matters related to the relevant Harbour Authority's statutory duties and powers by the Group Harbour Master, the General Counsel and EHS Managers. The Chief Operating Officer and the Managing Director (Port Services) oversee the implementation of policies and decisions of the Group and together with the Chief Executive have ultimate executive responsibility for the safety of operations and staff.

The Chief Operating Officer, the Managing Director (Port Services) the Group Harbour Master and the Port Directors are committed to the continuous improvement of safety within the Group ports by the constant development of policies, systems and techniques of risk control, governed by an independent, assured audit system.

This policy will be reviewed at annual intervals.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX VI

CLIMATE CHANGE POLICY

CLIMATE CHANGE POLICY STATEMENT



Climate change is recognised as one of the most pressing challenges facing the world today. International commitments have been made through the United Nations, recognising the threats and challenges posed by climate change and the need for wide ranging international action.

Peel Ports Group recognises the importance of the climate change challenge and the role it can play in responding to it. This includes the need to both adapt to current and future pressures and opportunities that climate change presents to the business, as well as to look at our own contribution with an aim to mitigate this impact. Peel Ports Group has committed to be a net zero port operator by 2040 at the latest.

Ports will have a key role to play in decarbonisation as businesses adapt to lower carbon technologies and modes of transport. We believe that ports, as key gateways, will be central to the low carbon economy of the future and deployment of renewable technologies.

In order to address the challenges posed by climate change, Peel Ports Group will:

- Maintain focus, visibility and direction on Climate Change issues relevant to our business through the Climate Change Steering Group
- Integrate climate change considerations into the business as a whole, for the purposes of adaptation and mitigation
- Measure and monitor our emissions footprint
- Use natural resources responsibly minimising waste and associated emissions
- Look for opportunities to decarbonise our operations, including identifying ways to reduce our greenhouse gas emissions and the consideration of alternative fuels and technologies
- Work with our current supply chain partners on these subjects, encouraging them to innovate and propose new products and services that acknowledge the requirements to adapt to and mitigate climate change impacts
- When selecting new supply chain partners, we will actively assess their approach, credentials and experience so as to proactively reduce the impact they have on climate change in the goods, works and services they provide to us
- Work with others, including our port users and tenants, to help enable low carbon transitions
- Recognise our role in facilitating a similar transition to a lower-carbon future across the maritime and transport sectors as a whole
- Understand and report on our climate change risks and opportunities in order to ensure business resilience as conditions change
- Consider the use of nature-based solutions and adaptive management

Peel Ports Group will continue to contribute to the local, national and global discussions on climate change to ensure that port interests are promoted, protected and ultimately form part of the solution for a sustainable future.

Claudio Veritiero CEO
Peel Ports Group

APPENDIX VII

RESOURCE MANAGEMENT POLICY

RESOURCE MANAGEMENT POLICY



Purpose

This Resource Management Policy sets out Peel Ports Group's intentions and goals with respect to resource use and management. Its purpose is to help embed efficiency and environmental awareness into everyday business. At Peel Ports we understand that good resource management goes hand in hand with good business. We are therefore committed to delivering good resource management across our group and to use resources in an appropriate and responsible way.

This policy sits alongside our other group policies, including the Group Environmental Policy Statement, which states that we will pursue the responsible and efficient use of natural resources and energy with the view to ensuring the sustainable use of resources and a reduction in carbon emissions. This policy applies to our use of electricity, water and fuels, as well as waste generation.

It is Peel Ports Group Policy to:

- Understand and benchmark our waste generation & energy consumption in order to improve performance and efficiency
- Comply with legal and relevant energy and greenhouse gas reporting requirements
- Set resource reduction targets and to work on projects to deliver agreed targets; recording progress in the Opportunities Database
- Seek to minimise waste across the Group and align all parts of the business with the Waste Hierarchy
- Achieve continuous improvement in our energy management systems and energy efficiency
- Make available the information, tools and resources required to achieve our emissions reduction targets and to undertake energy management to a high standard across the organisation
- Train and empower our employees to use resources efficiently
- Utilise our network of Energy Champions to improve energy management across the Group
- Consider sustainable energy and resource use at design stage for projects, including assessing potential suppliers against the whole life cost of their solutions, including energy and resource use over the lifetime of their assets
- Work with our supply chain to encourage the use, development and purchase of energy-efficient products and services that improve resource efficiency
- Share best practices and encourage action.

Commitment

As part of our commitment to good resource management we will look to embed these principles in all that we do across the organisation. Our management teams will be challenged to understand and appropriately manage the resources used in their operations. Our employees will be encouraged to take a positive approach to resource management and to ensure we are using resources efficiently and identifying opportunities to continuously improve.

Claudio Veritiero CEO
Peel Ports Group

APPENDIX VIII

ESG POLICY

ENVIRONMENTAL SOCIAL & GOVERNANCE POLICY

Peel Ports plays a critical role in ensuring the continuation of the supply chain in the UK, we take our responsibilities seriously. The nation relies on us for the continuation for the import and export of vital goods.

We aim to create safe, sustainable, long term opportunities for colleagues, customers and communities by ensuring they have the chance to share in the continued prosperity of investments.

Peel Ports Group is committed to:

Employment and Skills:

- Creating employment opportunities within the communities that we operate
- Developing our people through training to give them new skills for the future
- Building leaders of the future through our leadership development programme
- Creating a successful and inclusive environment where our people can thrive
- Removing barriers to employment for underrepresented and disadvantaged groups whilst building talented and diverse teams to drive business results
- Offering employment opportunities to those who serve or have served in our armed forces
- Pay 100% of our employees the Real Living Wage, ensuring equal pay for equal work

Local Business & Economy:

- Working with our supplier and customer base, to encourage ethical and sustainable business practices
- Providing opportunities for small and medium sized enterprises by procuring goods and services locally where possible
- Respecting human rights and not tolerating modern slavery within our supply chain
- Collaborating with industry and educational institutions on innovative projects

Community Engagement:

- Supporting young women gain the skills and confidence to pursue careers in STEM
- Supporting employee nominated local charities
- Encouraging our people to be as engaged as possible in making a difference in their community
- Through our health and wellbeing programme, support our people to live healthier lives

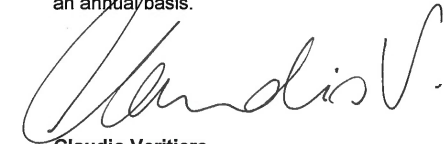
Net Zero and Biodiversity:

- Delivering our plan to be Net Zero by 2040
- Using resources efficiently to reduce waste, targeting continual improvement in recycle and re-use
- Playing our part to reduce air pollution, noise and nuisance within our local communities
- Develop our sites using modern sustainable building practices
- Working with stakeholder groups to research, protect and enhance marine biodiversity

Governance, Measurement & Reporting:

- Maintaining clear accountability for delivering this policy
- Monitoring and reporting our performance through an annual report
- Continuously improving our standards, efficiency and effectiveness

We will communicate this policy to our employees, customers, supply chain partners and relevant interested parties and review it on an annual basis.



Claudio Veritiero
CEO

November 2022

APPENDIX IX

MOBILE DEVICES POLICY

MOBILE DEVICES POLICY



Peel Ports Group operates as a statutory and competent harbour authority, licensing authority, port operator and a landowner in numerous locations around the UK and Ireland.

Peel Ports Group considers that the interests of the Group and its employees are best served by a positive and committed approach to Health, Safety and Welfare management. This approach will help to prevent work related injuries and ill health whilst also ensuring the continuing prosperity of the Group and its employees.

We are committed to creating an environment of zero harm and ensuring that we all go home safe every day. We will achieve this by ensuring our employees remain alert to their surroundings, changing environment and conditions at all times when undertaking daily work activities, when driving on business and when driving or operating machinery at work.

We are committed to promoting improvements to safety, health, and wellbeing by:

- Complying with all legislation, regulations, codes of practice and other requirements relevant to our business and for the use of company vehicles on private and public roads.
- Only using private mobile phones/devices for non-work activities when in welfare areas (such as canteens, rest rooms) and during breaks from work.
- Using mobile phones/devices only for work activities (such as reporting incidents and accidents, recording safety observations, capturing evidence post incident) and only in permitted locations which have been designated as safe for this purpose and as covered in group and local site inductions.
- Not making or receiving calls, sending or reading texts or emails or otherwise using a mobile phone/device (whether hand-held or hands-free) while driving plant or operating machinery. For the avoidance of doubt this also applies to listening to music, checking social media and using other multimedia devices such as tablets or ipods.
- Not using mobile phones/devices in company vans, minibuses and cars when driving on our ports.
- When driving outside of our ports and on company business, planning your journey to include regular rest stops to take calls and check and respond to messages. If a call is required, this must be made handsfree (in accordance with legal requirements) and only for a short duration with follow up calls taken at the next rest break. Teams and conference calls must not be joined or made.
- Not using mobile phone / devices for work or private purposes whilst walking up or down the stairs
- Reporting instances of non-conformance and ensuring management investigate non-compliance with this policy; requiring appropriate action to be taken in line with the company code of conduct against those that fail to adhere to it.
- Regularly reviewing our standards, requirements and expectations as set out within this policy.

You can call the emergency services to report an accident or incident if you are unable to stop in a safe location.

This Policy applies to every employee, third party labour, visitor and contractor of the Group when working at Peel Ports or visiting our sites. You should make yourself fully aware of its content, adhere to it at all times and support its implementation.

This policy will be reviewed at annual intervals.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX X

FAIR AND JUST CULTURE POLICY

FAIR AND JUST CULTURE POLICY



Peel Ports Group considers that the interests of the Group and its employees are best served by a positive and committed approach to Health, Safety and Welfare management. This approach will help to prevent work related injuries and ill health whilst also ensuring the continuing prosperity of the Group and its employees.

A "Fair and Just Culture" is a culture of trust and accountability. It takes account of the interaction people have with their working environment. It enables an organisation and its workforce to improve systems, learn from incidents and accidents and accept when someone makes a 'honest mistake'.

It also recognises that there are circumstances where there may be wilful non-compliance and action must be taken to manage inappropriate behaviours. It is not a culture without consequences. We will not tolerate deliberate violations, gross negligence or wilful misconduct. We expect that actions taken by colleagues will be commensurate with their experience and training.

At Peel Ports, we define a "Fair and Just Culture" as a culture which encourages mutual trust and open reporting, this is aligned to our 5C safety behavioural model:

CULTURE

Working safely is a core value of our business. We want everyone to go home safely every day.

COMPETENCY

It is our responsibility to ensure everyone understands the health and safety risks and are trained appropriately.

COMMUNICATION

We encourage open communication up and down the organisation whether it is good or bad.

CONFORMANCE

It is everyone's responsibility to conform to the health and safety rules and processes in place.

CONSISTENCY

Our operations are different, but we will set minimum standards across our Group.

This Policy applies to every employee and third party labour of the Group when working at or for Peel Ports. You should make yourself fully aware of its content, adhere to it at all times and support its implementation.

Here at Peel Ports we recognise the value a 'Fair and Just Culture' model can bring to our business. It will help us on our cultural journey towards zero harm.

This policy will be reviewed at annual intervals.

Claudio Veritiero
CEO - Peel Ports Group



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