

STATEMENT OF PEEL PORTS GROUP LIMITED (AS PARENT COMPANY FOR THE PEEL PORTS GROUP LIMITED GROUP OF COMPANIES) ON BEHALF OF PEEL PORTS PURSUANT TO THE MODERN SLAVERY ACT 2015 (“THE ACT”)

At Peel Ports we are committed to doing the right thing in the right way. Our policies and procedures aim to ensure that the highest standards of ethics and integrity are maintained. As a key operator in the ports industry and transport sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we are fully committed to combating matters in these areas.

ORGANISATION STRUCTURE & BUSINESS

Peel Ports owns port facilities and operates as the Statutory Harbour Authority for the Port of Liverpool, the Manchester Ship Canal, the River Medway and Sheerness Harbour, parts of the area along and around the River Clyde, Ardrossan Harbour, Twelve Quays at Birkenhead Docks and Heysham Port. Peel Ports also operates port facilities at Great Yarmouth Port where it acts as agent for the Statutory Harbour Authority.

OUR SUPPLY CHAIN

Our supply chain covers a broad range of goods and services associated with the operation of our business, including: third party direct labour, fixed and mobile plant and equipment, haulage, a wide range of engineering and operational goods and services, as well as both major and minor construction projects.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking and expect those in our supply chain and contractors to comply with our values and ethics. To that end we have in place a supply chain compliance programme. This consists of supplier certifications, contractual provisions requiring compliance and sanctions for supplier non-compliance.

We have a compliance team, which consists of representatives from the following departments:

- Legal/compliance;
- Human resources; and
- Procurement.

DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk we have implemented the following steps:

Supply Chain

Supplier Certifications and Contracts

- For any new Pre-Qualification Questionnaire or tenders for the supply of goods or services to Peel Ports, bidders are required to respond to a pass/fail question on whether their organisation is compliant with the Act;
- In light of the Act, Peel Ports revised its template agreements used for the purchase and supply of goods and services and Peel Ports also revised its standard purchasing terms and conditions (which are incorporated into all purchase orders);
- The revisions referred to above include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and requiring that adequate and compliant policies and procedures are maintained and enforced related to such matters and prohibiting any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. They also enable us to audit compliance in respect of such matters and terminate and cease dealing with any supplier in the event of a breach of any such obligations;

- We have undertaken an assessment of existing supplier relationships and formally approached certain key suppliers selected based on priority according to perceived risk (taking into account relevant factors such as supplier location and the nature of the supplies, such as the supply of labour). Each selected supplier was asked to confirm its understanding of and compliance with the Act and, where applicable, provide Peel Ports with a copy of its own statement pursuant to the Act. It is intended that selected lower priority suppliers will now be contacted in the same way and asked to provide the same confirmations; and
- With effect from August 2017, all new suppliers to Peel Ports have been required to sign a letter confirming their understanding of and compliance with the Act and, where applicable, provide Peel Ports with a copy of their own Modern Slavery Act statement.

Violations

In accordance with our zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking, our template agreements which are used for the purchase and supply of goods and services and our standard purchasing terms and conditions (which are incorporated into all purchase orders) now allow us to terminate and cease dealing with any supplier in the event of any such violation.

Our own business

Written policies and procedures

Code of Conduct

In March 2019, the Group adopted a new Code of Conduct and rolled out desk top training to all employees in relation to the Code. The Code of Conduct details the standards that all Peel Ports' employees are expected to adhere to in terms of behaviour. The Code sets out Peel Port's undertaking with regard to human rights and compliance with labour law. It contains a specific section on Modern Slavery, which details Peel Ports' responsibilities and Supply Chain Compliance Programme. It states Peel Ports' commitment to not use compulsory or forced labour in its operations and to maintain a framework of fair and just remuneration and working hours.

Whistleblowing policy

Peel Ports encourages all its workers, customers and business partners to report any concerns related to its direct activities or its supply chain. This includes any circumstances that give rise to an enhanced risk of slavery or human trafficking. Our Group whistleblowing policy is designed to make it easy for employees or officers to make disclosures without fear of retaliation.

Recruitment /Agency Workers Policy

Peel Ports uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

Peel Ports' Human Resources (HR) Department undertakes rigorous identity checks prior to employing individuals and ensures that all employees are in receipt of the minimum wage.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our businesses, the topic has been incorporated into workshop training provided by our HR Department for relevant managers and employees within our businesses. All new employees are advised of their responsibilities in relation to modern slavery as part of their HR induction.

Violations

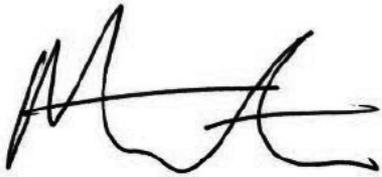
Our Disciplinary policy permits the termination of employment of employees found to be involved in any breach of the law including the law banning forced labour, slavery and human trafficking.

OUR EFFECTIVENESS IN COMBATting SLAVERY AND HUMAN TRAFFICKING

We will keep under review, monitor and assess how effective we are to ensure that slavery and human trafficking is not taking place in any part of our businesses or supply chains and we will take and implement all appropriate steps and measures to act on the findings and outcomes of any such reviews and assessments and maximise our effectiveness and continual improvement.

This statement applies to the Peel Ports division*. Some of the companies within Peel Ports Group have their own statement for the purposes of section 54 of the Modern Slavery Act 2015.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Peel Port's* slavery and human trafficking statement for the financial year ended 31 March 2019. The statement has been approved by our Board of Directors.

A handwritten signature in black ink, appearing to be "M. Whitworth", written in a cursive style.

Mark Whitworth
CEO
Peel Ports Group Limited

30 September 2019

*This Group statement constitutes the statement for the following Peel Ports' entities that are required to produce a statement pursuant to section 54(1) of the Modern Slavery Act 2015:

- Peel Ports Group Limited;
- Clydeport Operations Limited;
- Port of Sheerness Limited;
- The Manchester Ship Canal Company Limited; and
- The Mersey Docks and Harbour Company Limited.