

Peel Ports Group

Modern Slavery Statement

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Introduction

This is the FY24 Modern Slavery Statement of Peel Ports Group Ltd, the parent company for the Peel Ports Group of companies, on behalf of Peel Ports Group, pursuant to the Modern Slavery Act 2015 (“the Act”).

At Peel Ports Group, 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.

Peel Ports Group 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 Group also operates port facilities at Great Yarmouth Port where it acts as agent for the Statutory Harbour Authority and Humber Bulk Terminal. Peel Ports Group also has a shipping line division, BG Freight Line, which is based in the Netherlands and provides a short sea and feeder container services between the UK, Ireland and mainland Europe as well as a logistics business, Peel Ports Logistics. BG Freight Line and Peel Ports Logistics have their own separate Modern Slavery Statements.

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.

Having a robust, ethically sourced and diverse supply chain is a non-negotiable priority. Our goal is to create a transparent and accountable environment, ensuring that Peel Ports Group and its stakeholders uphold high ethical standards and actively work to prevent modern slavery and human trafficking.

As part of our initiative to identify and mitigate risk in our supply chain we continue to apply the following measures:

- When selecting and pre-qualifying our supply chain, suppliers are required to respond to tailored pass/fail questions covering ethical and sustainable procurement including whether their organisation is compliant with the Act.

Suppliers who are not demonstrably compliant with the Act are not permitted to work with Peel Ports Group.

- Peel Ports Group's template agreements used for the purchase and supply of goods and services and its standard purchasing terms and conditions (which are incorporated into all purchase orders) include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and require that adequate and compliant policies and procedures are maintained and enforced in relation to such matters and prohibit 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.
- All new suppliers are required to sign up to Peel Ports Group's Supplier Code of Conduct which contains our requirements for sustainable and ethical supply management, including those relating to Modern Slavery.
- Peel Ports Group holds the Chartered Institute of Procurement and Supply (CIPS) Corporate Mark for ethical procurement and supply management. This corporate accreditation demonstrates the proactive steps that we have taken to safeguard against unethical conduct in procurement and supply management including in relation to Modern Slavery.
- We are the first ports group in the UK to become a partner of the Supply Chain Sustainability School which provides access to best practice online resources as well as engagement with other large corporates on all sustainability related issues, including modern slavery risk.
- Peel Ports Group has become the first port group to join SEDEX (Supplier Ethical Data Exchange), the largest supplier ESG related data platform in the world. This platform enables greater supplier transparency and risk management in all ESG related areas, including modern slavery.

Policies

Peel Ports Group's Modern Slavery Statement is supported by the following policies:

- Anti-Slavery And Human Trafficking Policy
- Anti Bribery And Corruption Policy
- Whistleblowing Policy
- ESG Policy
- Supplier Code Of Conduct 2023

All of these policies are publicly available here: <https://www.peelports.com/group-policies>

In addition, the Peel Ports Group 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.

2024 Risk Assessment

In 2024 Peel Ports Group engaged a third party independent consultancy, Align Ltd ("Align"), to conduct a modern slavery risk assessment of the BG Freight Line division. We recognised that the most significant risk across the business relates to the crew on the vessels that BG Freight Line charters.

This risk assessment included several interviews with key members of staff at BG Freight Line and a review of BG Freight Line's current approach, policies and efforts to protect individuals and its supply chain against the risk of modern slavery. In addition, Align facilitated a lived experience site assessment of one of BG Freight Line's chartered vessels that had travelled from the Netherlands to England. Crews were engaged on the vessel, the officers and the captain were interviewed, documents were reviewed and a physical assessment of the vessel was conducted. The insights from all of these activities have given BG Freight Line some clear recommendations to inform its actions in 2024-2025.

Training On Modern Slavery

All new employees are advised of their responsibilities in relation to modern slavery as part of their HR induction.

In September 2023 a number of employees attended a modern slavery training session with the Supply Chain Sustainability School.

A new training programme is being rolled out for all Peel Ports Group employees in 2024 and this will include a module on modern slavery. Certain employees will also take part in a “Modern Slavery Masterclass” training session delivered by lived experience experts to raise awareness and education and drive ongoing engagement.

Modern Slavery Posters

In August 2023 Peel Ports Group published a modern slavery poster to highlight to staff modern slavery and provide contact details to raise any modern slavery concerns.

In 2024 we are updating the BG Freight Line posters to include more striking images and reference to CoMensha - a Dutch modern slavery NGO that provides specific advice in the Netherlands.

2025 Focus Areas

We will build on our modern slavery statement year on year by identifying tangible actions and tracking and monitoring their effectiveness. We will report back on our progress via our modern slavery statement.

In the case of BG Freight Line this will include working with vessel owners by engaging them in discussions about modern slavery, as well as implement KPIs to message their progress.

We will also review another high risk area within our business, that being the third party construction workers engaged on the group’s construction projects.

Actions Carried Out and 2025 Proposed Actions

What we said we would do in 2023	What we did in 2024	What we will do in 2025
Introduce training	We delivered introduced a new training programme will carry out a “Modern Slavery Masterclass” with a lived experience consultant.	Continue to improve our modern slavery statement.
Introduce an awareness campaign	We introduced a poster campaign.	Maintain / improve supply chain management processes. In the case of BG Freight Line this will include updating its charterparty terms to require modern

		slavery due diligence which will be audited annually.
Carry out a risk assessment	We engaged Align to carry out a risk assessment in respect of vessels chartered by BG Freight Line.	We will risk assess another high risk area within our business, namely third party construction workers engaged on the group's construction projects.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Peel Ports Group's* slavery and human trafficking statement for the financial year ended 31 March 2024. This statement has been approved by our Board of Directors.



Claudio Veritiero
CEO
Peel Ports Group Limited
September 2024

*This statement constitutes the statement for the following Peel Ports Group entities, some of which 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;
- The Mersey Docks and Harbour Company Limited;
- The Mersey Docks and Harbour Company (RSCT) Limited;
- The Mersey Docks and Harbour Company (L2) Limited;
- Great Yarmouth Port Company Limited;
- Heysham Port Limited;
- Coastal Container Line Limited;
- MDHC Container Services Limited;
- PPL Humber Bulk Terminal Ltd.