



ENVIRONMENT, HEALTH AND SAFETY PLAN 2022/23

Incorporating Group EHS Strategy & Targets

TABLE OF CONTENTS

Foreword From Claudio Veritiero, CEO	3
1. Introduction	4
2. A Reminder of Peel Port Core Values	6
3. Our Environment, Health and Safety (EHS) Vision & Goal	7
4. Our Safety Behaviours	8
5. Our Peel Ports Journey so far	10
6. Measuring Performance	12
7. Our New Environment, Health & Safety (EHS) Strategy for 2022-2025	14
8. Strategy Targets	24
9. Port Cluster Targets & Objectives for 2022/23	27
10. Prioritising & Delivering the EHS Strategic Plan - Year 1 2022/23	34
Controlling Risk	36
Learning Together	42
Working In Partnership	48
Caring For Our Assets	52
Being Prepared	56
Protecting Health	58
Reducing Our Impact	64
Leading For Safety	70
Appendix I - Glossary of Terms	74
Appendix II - Group Environmental Policy	76
Appendix III - Group Health, Safety & Welfare Policy	78
Appendix IV - Group Quality Policy	80
Appendix V - Group Port Marine Safety Code Policy	82



Welcome

As a business our number one priority will always be to ensure our teams, contractors and visitors remain safe and healthy when working on our sites. The past year has continued to be a challenge for us along with many other businesses in the fight against Covid, I am pleased to say however that despite this, we continue to deliver good safety performance and lead the way in our sector. Our reduction in lost time injuries has remained a focus for us; and in the past year we have chosen to widen this

measure to include those injuries which have led to restricted duties and medical treatment. We must all continue to work together on our journey towards a zero-harm workplace.

In a year when we announced our pledge to be net zero by 2040, environment remains an important part of our strategy. Operating our sites and facilities to minimise impact on the environment is key to us having a sustainable business and collectively ensuring we do our bit to reduce global emissions.

The past two years have highlighted the impact a global pandemic can have on the health of ourselves, families and friends. We have been quick to adapt our operations to the changes we have all experienced as a consequence of Covid. The professional way in which everyone has reacted to the ever-changing environment and continued to deliver for our customers as key workers is something everyone should be very proud of.

As we look towards the future it is important that we set ourselves challenging new goals and that's why the board and I are pleased to endorse the new three-year strategy for environment, health and safety which forms the basis of this plan. The strategy has been developed around eight key themes which provide the business with the necessary focus to continue our drive to reduce accidents and incidents, protect health and deliver on our environmental ambitions.

It has been a challenging year in which you have all played your part. Remaining focussed on ensuring everyone gets home safely each and every day is something we must not compromise on. Our goal of zero harm is something we can all help to achieve by delivering safe and sustainable operations.

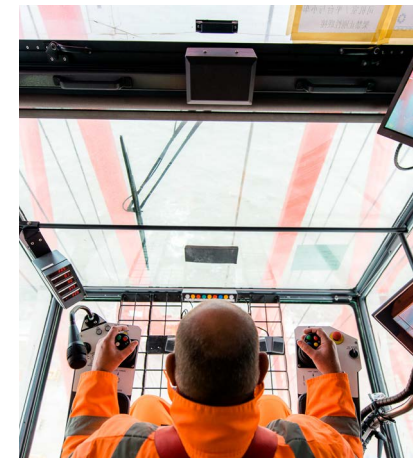
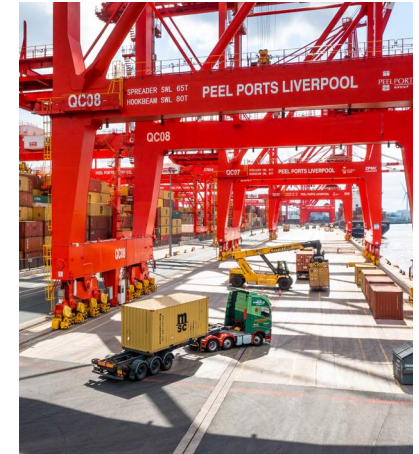
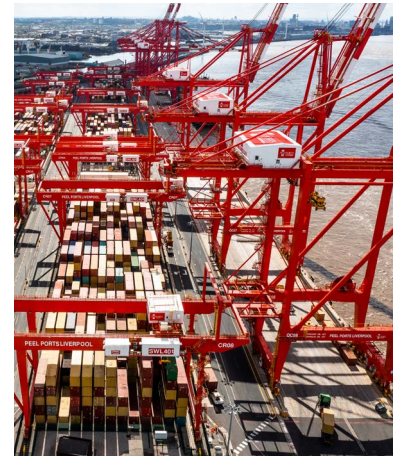
Claudio Veritiero,
CEO, Peel Ports Group

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 next 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 plan 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. CORE VALUES

Peel Ports “Core Values” represent the five pillars that help to guide our thriving and successful business. During 2018, the first Value, “Personal Responsibility” was amended to ensure that our values refer explicitly to our company’s safety commitment.

1. Personal Responsibility

We are accountable for our decisions and actions, together with the outcomes we create and the impact on others.

This is true of all business activities and most importantly those that could affect the health and safety of our colleagues. We must ensure that everyone returns home safely to their families every day.

2. Integrity and Honesty

Having integrity and being honest are fundamental requirements of personal development.

Honesty and integrity create trust which in turn delivers confidence and encourages us to take risks in order to fulfil our goals.

3. Strive for excellence

We follow and uphold the rules and standards set for our business and remain committed to quality outcomes, have a thirst to learn and to continuously improve.

4. Hearfelt Customer Service

Creating a positive customer experience is what we strive to do. Our customer relationships are long term and need to be sustained; they are not simply transactional.

5. One Team

Whatever the strength of individuals, we will always accomplish more together. We put the team ahead of our personal success and commit to building its capability.

These core values are the essence of Peel Ports’ identity.

03. 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

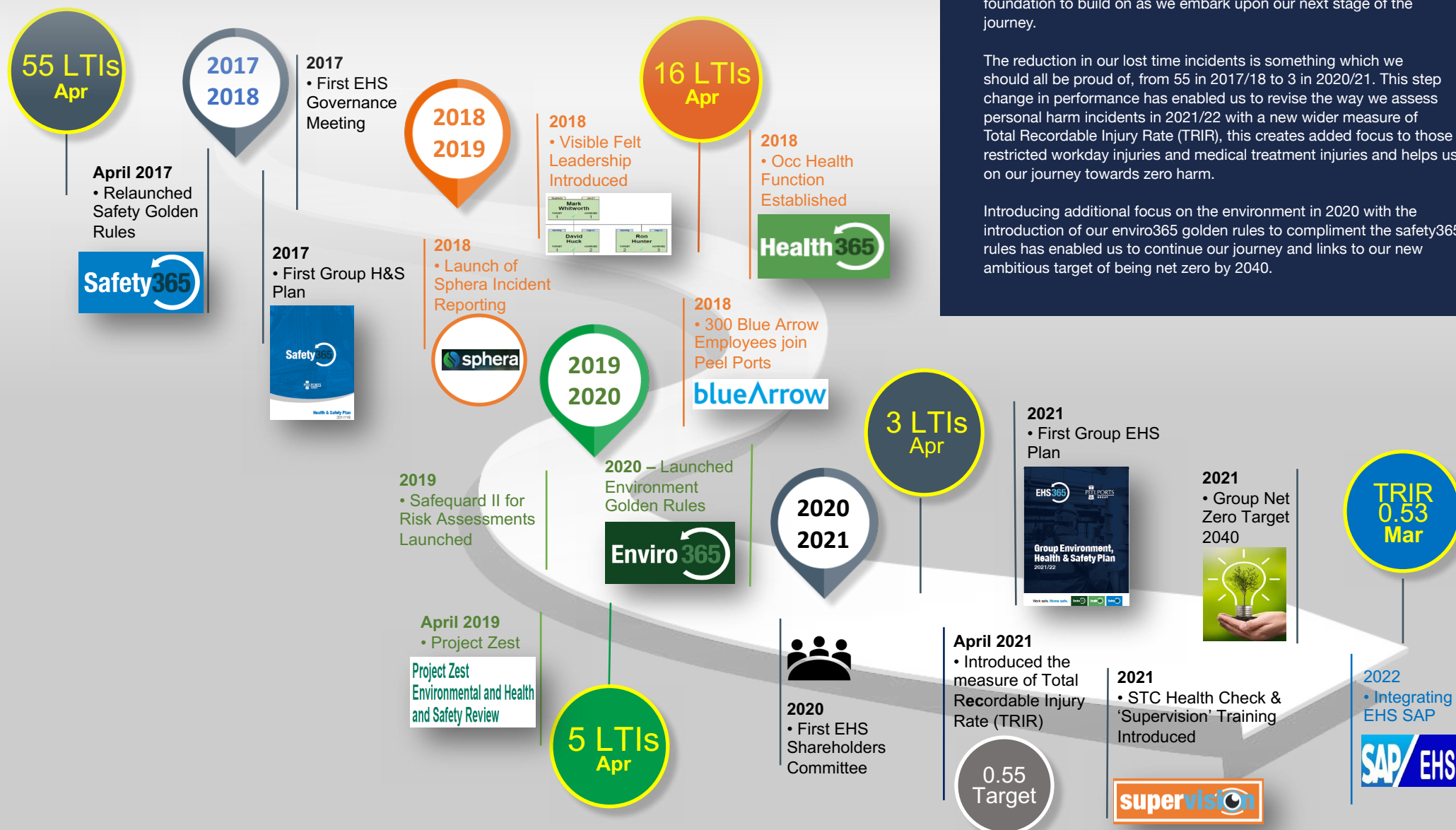
Our behaviour model focuses on five key areas of focus:

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



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 identify where we need to focus our attention to continuously improve.

Some key measures from 2021/22

TRIR

0.53

EHS Audit %
Compliance

81%

Hazard
Observations

6242

VFL Tours

5141

Contractor Audit %
Compliance

97%

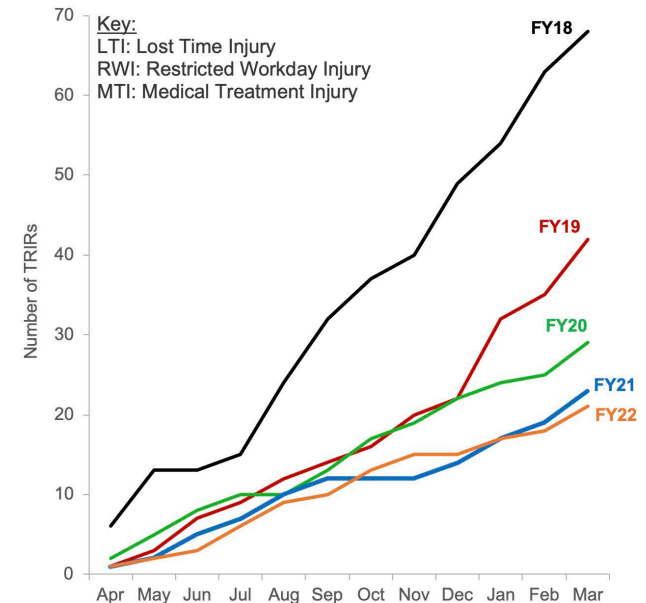
Near Misses

197

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 remained focussed on and will continue to be a key safety metric for us throughout the period of the new EHS 3-year strategy.

The graph below compares the significant progress we have made in our safety performance since 2018.

Peel Ports Group, TRIR Incidents



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 risk assessments, this new tool EHS SAP will help us to interrogate the data and identify where we can improve. It is important during this transition that our positive reporting culture is maintained, your continued support is necessary to achieve this.

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:





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**



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**



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.**



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.**



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**



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 SAP EHS**
- **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**



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



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

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.

0.44 TRIR (FY) 20% REDUCTION

0.36 TRIR (FY) 20% REDUCTION

0.30 TRIR (FY) 20% REDUCTION

**TARGETING
ZERO HARM**

2022/2023

2023/2024

2024/2025

**100% OPERATIONAL FACILITIES CERTIFIED
TO 14001**

**20% PERFORMANCE IMPROVEMENT IN GRESB/ESG
REPORTING & BENCHMARKING**

10% REDUCTION IN ENVIRONMENT INCIDENTS

**NET ZERO
2040**

2022/2023

2023/2024

2024/2025



09. Port Cluster Targets & Objectives for 2022/23

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

In support of the delivery of Peel Ports Group's 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 Injuries (RWI) and Medical Treatment Injuries (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 divide by the actual 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 different industry sectors.

In 2022/23 our TRIR group frequency rate target will be set at 20% of 2021/22 target

Peel Ports Group TRIR(FR)Target for 22/23 = 0.44

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 0.44) in Group Total Recordable Injury Frequency Rate	Claudio Veritiero	31st March 2023
Target 2	Business areas which fall behind the Group target at the end of the year will be required to attend the EHS shareholder committee to present an action plan for improvement.	Port Directors	March 2023
Target 3	Deliver business total recordable injury target (or less) (as per table 1)	David Huck/Port Directors/ Exec Team	31st Mar 2022
Target 4	Business areas who deliver a performance ahead of target (Table 1) will attend the EHS Shareholder meeting to provide an overview of their sustained performance improvement and any learnings for the wider group.	Port Directors/ Business Leads	March 2023

In Table 1 we have set individual business targets to complement our Group TRIR target for 22/23 which is 0.44, these have been apportioned based upon head count. This will provide focus on each business area and links to the requirements of targets 2, 3 and 4 above.

Table 1: Individual Business Total Recordable Injury Target

Port Cluster	TRI Target (FY) 22/23
Mersey	≤(4)
Clydeport	≤(2)
Containers	≤(6)
SE Cluster Ports	≤(3)
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 etc. across the business, it is essential that these nominated roles are maintained across the ports.

	Target Title	Owner	Due Date
Target 5	Ensure board appointed duty holders are maintained up to date in line with Group Procedure 'PRC 030 PPG HSE'	Port Directors	Quarterly
Target 6	Deliver annual duty holder statements (Electrical/Fire/Asbestos) for each port cluster to the Board via the EHS Governance Committee	Port Directors/ Chris Ingham	March 2023
Target 7	Duty Holders must attend as required quarterly meetings to discuss ongoing responsibilities	Port Directors	Quarterly

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

- **Animal Feed Stores (ISO 9001/14001/45001)**
- **Royal Seaforth Grain Terminal (RSGT) (ISO 9001/14001/45001)**
- **Ellesmere Port (ISO 9001/45001)**
- **Runcorn (ISO 9001/45001)**
- **Medway (ISO 9001/14001/45001)**

In 2023 the remaining Port Operations will be certified to the three standards.

	Target Title	Owner	Due Date
Target 8	Each Port Cluster to ensure ISO certification is achieved for all operational areas not covered by the delivery of the 21/22 EHS plan.	Port Directors	March 2023

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 9	All EHS annual audit actions raised in the 2021/22 audits must be closed out before 22/23 audits commence.	Port Directors	Sept 2022

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 10	Ports will conduct random testing for drugs and alcohol in line with Group OH schedule for 22/23	Port Directors	March 2023

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 11	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 2023

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 12	Deliver zero enforcement actions by health & safety and environmental regulators in the UK and Ireland	Claudio Veritiero	31st March 2023

Safety Climate Survey

Understanding the safety culture in Peel Ports is an important aspect of continuing the journey towards zero harm. The feedback we receive from our workforce is critical to understanding how effective our EHS Strategy is performing across our Ports. In 2022 we completed our second safety climate survey, this will help us to understand the areas we are improving in; and those we need to put more focus on.

	Target Title	Owner	Due Date
Target 13	Create a Group report summarising the climate survey findings and actions.	Chris Ingham	May 2022
Target 14	Create Cluster reports summarising climate survey local findings and actions. Ensure this is communicated effectively and closed out by March 2023.	Port Directors	June 2022



10. Prioritising & delivering the EHS Strategic Plan – Year 1 2022/23

To ensure we meet our strategic ambitions for EHS we need to prioritise delivery of our plan.

Through consultation with the senior leadership team at group and port level in conjunction with the EHS Team we will deliver our strategic plan over a three-year period. The strategic themes enable us to present a number of SMART objectives to support the delivery of the plan.

Our Group priorities for 2022/23 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 15	Standardise risk assessment training and competence requirements across the ports	Chris Ingham/EHS Managers	May 2022
Target 16	Introduce and embed into the business the risk management module in SAP	Chris Ingham/Port Directors	April 2022
Target 17	Review & update existing risk assessments and transfer to EHS SAP risk management module	Port Directors/EHS Managers	March 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

Design and implement a Group Permit to Work system.

	Target Title	Owner	Due Date
Target 18	Determine the Peel Ports specification for a permit to work (PTW) system	Chris Ingham/ PTW Working Group	July 2022
Target 19	Create, consult on and issue group standard/procedure for permit to work	Chris Ingham/ PTW Working Group	Oct 2022
Target 20	Go out to market and procure a PTW system or design in-house and implement into the business	Chris Ingham/ PTW Working Group	Jan 2023
Target 21	Create training package to support launch of PTW system	Chris Ingham/ PTW Working Group	Feb 2023



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 22	Produce an EHS legal register for the group and create a process for updating quarterly and communicating this across the Group	Chris Ingham	June 2022
Target 23	Ports to take the Group legal register and make port specific, complete quarterly reviews and update in accordance with Group legal register	Port Directors/EHS Managers	September 2022
Target 24	Undertake a gap analysis of current Group EHS policy, procedure and processes and create additional documentation to fulfil the Groups EHS requirements	Chris Ingham	March 2023



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 25	Review and update Group EHS annual audit process	Sophie Farrell	June 2022
Target 26	Develop, consult & publish EHS audits aligned to legal compliance requirements (prioritise by risk)	Sophie Farrell	September 2022
Target 27	Update audit procedures, information and guidance aligned to change in assurance framework (Level 1, Level 2, Level 3, Level 4)	Sophie Farrell	September 2022
Target 28	Identify audit specific training requirements aligned to assurance activities and roll this out across the group.	Sophie Farrell	September 2022
Target 29	Create an annual assurance plan for group and local level audit compliance activities	Sophie Farrell	September 2022
Target 30	Develop an EHS audit dashboard for communicating compliance to ports and the Group	Sophie Farrell	December 2022



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, ensuring the business operates consistently and in compliance.

Strategic Deliverable

Deliver and implement an effective EHS Document Management System.

	Target Title	Owner	Due Date
Target 31	Creating an effective and accessible EHS document management system in share-point for policy, procedure, information and guidance	Chris Ingham/ Kathy Dale	June 2022
Target 32	Managing the production, consultation and issue of EHS documents at Group level	Chris Ingham/ Kathy Dale	March 2023



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

Enhance and improve EHS training matrices and develop standardised training packages across the group.

	Target Title	Owner	Due Date
Target 33	Ensure all business areas have comprehensive EHS training matrices identifying training by role	Port Directors/EHS Managers	April 2022
Target 34	Capture all EHS training records in the learning management system (LMS) and produce regular reports on compliance	Dan Weigh	April 2022
Target 35	Select common training needs and procure standardised training packages where appropriate to business needs	Dan Weigh	March 2023
Target 36	Evolve dashboard reporting to satisfy governance requirements for employees and third-party labour	Dan Weigh	March 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 37	Create EHS communications plan to support 2022 - 2025 strategy delivery	Chris Ingham/ Kelly Ralph	June 2022
Target 38	Develop in conjunction with the communications team, innovate and develop new ideas for sharing EHS materials at all levels across the business	Chris Ingham/ Kelly Ralph	March 2023
Target 39	Consult with business to ensure EHS communications continue to meet the business needs	Kelly Ralph	March 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

Improve EHS investigations with a Peel Ports specific training course aligned to SAP.

	Target Title	Owner	Due Date
Target 40	Develop and implement an EHS investigation training package for Peel Ports Group	Andrew Wilson	April 2022
Target 41	Revise and improve EHS investigation procedures, information and guidance to ensure consistency and to support business learning	Chris Ingham	March 2023
Target 42	Embed EHS SAP Investigation tool and ensure this is used to investigate all required incidents	Port Directors/EHS Managers	April 2022



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

Mobilise and effectively integrate EHS SAP across the Group.

	Target Title	Owner	Due Date
Target 43	Launch & Integrate EHS SAP across the business	Chris Ingham	April 2022
Target 44	Incorporate EHS SAP training into induction process	Dan Weigh	April 2022
Target 45	Close out and archive data and information from existing Sphera and Safeguard platforms and transfer where required into EHS SAP	Port Directors/EHS Managers/ Group IT	October 2022



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 events 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 46	Define and issue documentation to support the identification of 'near miss' and 'high potential controllable event' (HPCE) incidents	Chris Ingham	May 2022
Target 47	Ensure an investigation is completed for all near miss and HPCE incidents	Port Directors/EHS Managers	March 2023
Target 48	Include near miss and HPCE incidents in EHS dashboards and track business performance	Sophie Farrell	April 2022



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 matters of health and safety. 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 49	Create a Health & Safety Representative Charter, consult and issue in conjunction with the unions	Chris Ingham	April 2022
Target 50	Identify all the safety reps/res across the business and communicate this to the business	Chris Ingham/ Mandy Willis	May 2022
Target 51	Review the approach to safety rep/res meetings and encourage formalised standard agenda and meeting records	Port Directors/EHS Managers	March 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 52	Invite the National Unite Officer to attend Peel Ports EHS Governance Committee	Chris Ingham	April 2022
Target 53	Continue to support union engagement days and forums	Chris Ingham	March 2023



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 54	Develop a process for standardising EHS policy, procedure, information and guidance as appropriate across Marine and Landside operations	Chris Ingham/ Gary Doyle	March 2023
Target 55	Create Peel Ports combined response plans which incorporate landside and marine for EHS incidents	Chris Ingham/ Gary Doyle	March 2023
Target 56	Work with our shipping lines, agents and customers to ensure safe working and continuous improvement practices	Port Directors	March 2023



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

Producing risk based focussed asset management plans with short and long term targets

	Target Title	Owner	Due Date
Target 57	Ensure an EHS risk-based approach to short and long term asset management planning at a local Port Cluster level	Port Directors	March 2023
Target 58	Track delivery of asset management upgrades which relate to EHS risks within the Managing Responsibly Meetings	Port Directors/ Head of Engineering	March 2023
Target 59	Produce an end of year summary for the EHS Governance Committee of asset management upgrades or improvements which are linked to EHS performance	Port Directors/ Head of Engineering	March 2023
Target 60	Undertake a review of the mobile plant in operation at Peel Ports Logistics and incorporate into Peel Ports Group standard	Malcolm Oliver-White/ Seb Gardiner	March 2023



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

Utilise output from EHS investigations to improve infrastructure design and layout.

	Target Title	Owner	Due Date
Target 61	Identify through SAP EHS incident investigations, infrastructure issues and defects which require a re-design and upgrade to improve EHS performance	Port Directors/EHS Managers	March 2023
Target 62	Create a process for reviewing the output of EHS investigations to improve ongoing asset maintenance strategies	Port Directors/EHS Managers	March 2023
Target 63	Embed any design changes identified by using the 'change management' process	Port Directors/EHS Managers	March 2023
Target 64	Utilise the output from EHS investigations to inform the capital investment and upgrade programme aligned to risk	Port Directors/EHS Managers	March 2023
Target 65	Review improvements to mobile plant safety and environmental performance and incorporate these enhancements in the replacements and upgrades.	Malcolm Oliver-White	March 2023





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

Undertake a gap analysis of existing Group and Port Crisis Management, Emergency response and business continuity arrangements.

	Target Title	Owner	Due Date
Target 66	Conduct a comprehensive review of Peel Ports existing arrangements for dealing with emergencies	Chris Ingham	Dec 2022
Target 67	Produce a report and present the findings to the EHS Governance Committee, utilise the output to prioritise delivery of the remaining 'Being Prepared' strategic deliverables	Chris Ingham	February 2023



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

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

	Target Title	Owner	Due Date
Target 68	Review existing guidelines and update to create additional case management guidelines	Wendy Freeman	June 2022
Target 69	Re-issue case management guidelines and provide supervisor and manager training to support updates	Wendy Freeman	September 2022
Target 70	Utilise improved EHS SAP reporting to measure occupational ill-health and implement KPI's across the group (OIFR)	Wendy Freeman	March 2023



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 SAP EHS.

	Target Title	Owner	Due Date
Target 71	Implement EHS SAP Occupational Health Module	Wendy Freeman	March 2023
Target 72	Identify any specific business wide training requirements of the Occupational Health module of SAP and roll this out	Wendy Freeman	March 2023
Target 73	Create Occupational Health dashboards to report KPI's across the group	Wendy Freeman/ Sophie Farrell	September 2022



We all spend a lot of time at work which enables the 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 74	Establish a cross business working group to deliver a plan for health & wellbeing education and support programmes	Wendy Freeman	May 2022
Target 75	Take the output from the cross business health & wellbeing working group and create mental health strategy	Wendy Freeman	December 2022
Target 76	Analyse business HR data to determine business specific priorities and deliver these first	Wendy Freeman	December 2022
Target 77	Deliver mental health first aid training and support programme	Wendy Freeman/ Chris Ingham	March 2023



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 through contracted support.

	Target Title	Owner	Due Date
Target 78	Continue to embed and improve the process for assessing the requirements for health surveillance across Peel Ports	Port Directors/EHS Managers	March 2023
Target 79	Develop health surveillance to align to the workplace task risks assessments and ensure an annual 95% completion rate	Wendy Freeman	March 2023
Target 80	Implement a health surveillance contract with a third-party provider for Peel Ports	Wendy Freeman	March 2023
Target 81	Evolve the existing health screening procedures and processes to capture new starter, role change and other work-related requirements	Mandy Willis/ Wendy Freeman	March 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

Develop, consult on and implement a sustainability strategy for Peel Ports group.

	Target Title	Owner	Due Date
Target 82	Create, consult on and publish a sustainability strategy for peel ports	Shaun McKenna	March 2023
Target 83	Produce an implementation plan to deliver the strategy	Shaun McKenna	March 2023



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

Strategic Deliverable

Introduce and deliver objectives linked to our carbon reduction strategy.

	Target Title	Owner	Due Date
Target 84	Review and update policy on climate change and create carbon reduction strategy	Shaun McKenna	March 2023
Target 85	Quantify and prioritise our direct, indirect and associated greenhouse gas emissions through reduction targets	Shaun McKenna	March 2023
Target 86	Create a communications strategy and targeted training to enable Peel Ports team to support 'Net Zero 2040' target	Shaun McKenna	June 2022
Target 87	Produce a capital investment programme aligned to carbon reduction strategy deliverables and wider business priorities	Shaun McKenna/ John McCormack	March 2023



Our operations utilise resources and create waste, we can minimise the use of materials if we understand the amount we use. Reducing our inputs has 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 88	Develop & Implement a strategy to ensure peel ports minimise waste to landfill	Shaun McKenna	Sept 2022
Target 89	Refresh and update group policy & guidance on resources and waste in-line with company targets to decarbonise	Shaun McKenna	Sept 2022
Target 90	Create an effective process for managing waste & resource across the group through a tendered supply chain process	Shaun McKenna/ James Riddick	March 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

Create a climate change impact plan for Group and Port Clusters.

	Target Title	Owner	Due Date
Target 91	Identify a climate change champion in each port and review existing climate change adaptation reports and identify any gaps or changes in risk	Shaun McKenna/ Gary Doyle/ Port Directors	March 2023
Target 92	Create a climate adaptation plan and programme to deliver reduction in climate change associated risk	Shaun McKenna/ Gary Doyle	March 2023
Target 93	Align the plan and risk assessments to accelerate the programme of upgrade to existing infrastructure and assets	Shaun McKenna/ Gary Doyle/ John McCormack	March 2023



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 94	Develop asset specific drainage & maintenance strategy for clusters and terminals	Steve Graham	June 2022
Target 95	Implement a programme of remediation and upgrade works aligned to strategy to deliver drainage improvements, considering where appropriate natural drainage management	Steve Graham/ Heads of Engineering/ John McCormack	March 2023



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 supervisors and managers have a key role to play in delivering safe operations. We recognise that training is a key component part of our competence framework and will deliver more effective supervision across our ports

Strategic Deliverable

Continue to deliver supervision and management soft skills training in partnership with STC INSISO.

	Target Title	Owner	Due Date
Target 96	Create a prioritised roll out plan for STC health check and training across Peel Ports	Chris Ingham	April 2022
Target 97	Include 'Supervision' training in the EHS training matrices for all supervisors, team leaders & managers	Dan Weigh	April 2023



A collective understanding of our business performance helps us all work towards a common goal. The challenge we face is providing business information which enables our employees to understand our EHS performance and in-turn help us to achieve our targets.

Strategic Deliverable

Improve data reporting at all levels in the organisation to ensure effective engagement with the whole workforce

	Target Title	Owner	Due Date
Target 98	Improve EHS dashboard reporting aligned to EHS SAP and routinely communicate this across the ports	Sophie Farrell	May 2022
Target 99	Create a standardised approach to start of shift & end of shift briefings, consult on this and implement across the ports	Port Directors/EHS Managers	September 2022



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

Consult on and implement a 'Fair & Just' culture model and process.

	Target Title	Owner	Due Date
Target 100	Develop a 'Fair & Just' culture model	Chris Ingham	April 2022
Target 101	Create a procedure and guidance to support the business in implementing the model	Chris Ingham	July 2022
Target 102	Consult and engage on the model with identified stakeholders	Chris Ingham	September 2022
Target 103	Conduct a trial implementation of the 'Fair & Just' culture model in part of the Peel Ports business	Chris Ingham	November 2022
Target 104	Produce communications and launch the model across Peel Ports	Chris Ingham/ Kelly Ralph	January 2023

APPENDIX I

GLOSSARY OF TERMS

All incidents should be recorded once, in the highest appropriate category.

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:	A minor injury that does not require first aid or other treatment e.g. minor cut, bruise or graze.

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.



Mark Whitworth
Chairman, Peel Ports Group



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.



Mark Whitworth
Chairman, Peel Ports Group



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.



Mark Whitworth
Chairman, Peel Ports Group



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.



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