

# 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.

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**Claudio Veritiero**  
Chief Executive Officer - Peel Ports Group

V4.4 - April 2025

# 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.

A handwritten signature in black ink, appearing to read "Claudio V.", positioned to the left of the name and title.

**Claudio Veritiero**  
Chief Executive Officer - Peel Ports Group

V6.6 - April 2025

# 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.

A handwritten signature in black ink, appearing to read "Claudio V.", positioned to the left of the name and title.

**Claudio Veritiero**  
Chief Executive Officer - Peel Ports Group

V2.4 - April 2025

# 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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**Claudio Veritiero**  
Chief Executive Officer - Peel Ports Group

V3.3 - April 2025

# 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.

A handwritten signature in black ink, appearing to read "Claudio V.".

**Claudio Veritiero**  
Chief Executive Officer - Peel Ports Group

V2.1 - April 2025

# CLIMATE CHANGE POLICY STATEMENT

## 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.

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**Claudio Veritiero**  
Chief Executive Officer - Peel Ports Group

V3.1 - April 2025

# 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.

A handwritten signature in black ink, appearing to read "Claudio V.", with a stylized flourish at the end.

**Claudio Veritiero**

Chief Executive Officer - Peel Ports Group

V1.3 - April 2025

# MOBILE PHONE 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.

A handwritten signature in black ink, appearing to read "Claudio V.", with a stylized flourish at the end.

**Claudio Veritiero**

Chief Executive Officer - Peel Ports Group

V1.4 - April 2025



# ENVIRONMENT, 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 supplier 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 standards, improving 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.

A stylized, handwritten signature in black ink, reading "Claudio V.".

**Claudio Veritiero**

Chief Executive Officer - Peel Ports Group

April 2025