

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

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

### **ORGANISATION STRUCTURE & BUSINESS**

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

### **OUR SUPPLY CHAIN**

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

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

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

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking and expect those in our supply chain and contractors to comply with our values and ethics. To that end we have in place a supply

chain compliance programme. This consists of supplier certifications, contractual provisions requiring compliance and sanctions for supplier non-compliance.

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

- Legal/compliance;
- Human Resources; and
- Supply Chain.

## **DUE DILIGENCE PROCESSES**

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

### **Supply Chain**

#### **Supplier Certifications and Contracts**

- When selecting and pre-qualifying our supply chain, suppliers are required to respond to tailored pass/fail questions covering ethical and sustainable procurement including whether their organisation is compliant with the Act. Suppliers who are not demonstrably compliant with the Act are not permitted to work with Peel Ports Group.
- Peel Ports Group's template agreements used for the purchase and supply of goods and services and its standard purchasing terms and conditions (which are incorporated into all purchase orders) include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and require that adequate and compliant policies and procedures are maintained and enforced in relation to such matters and prohibit any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. They also enable us to audit compliance in respect of such matters and terminate and cease dealing with any supplier in the event of a breach of any such obligations.
- All new suppliers are required to sign up to Peel Ports Group's Supplier Code of Conduct which contains our requirements for sustainable and ethical supply management, including those relating to Modern Slavery.
- Peel Ports Group's Supply Chain holds the Chartered Institute of Procurement and Supply (CIPS) Corporate Mark for ethical procurement and supply management. This corporate accreditation demonstrates the proactive steps that we have taken to

safeguard against unethical conduct in procurement and supply management including in relation to Modern Slavery.

- Peel Ports Group is the first ports group to become a partner of the Supply Chain Sustainability School which provides access to best practice online resources as well as engagement with other large corporates on all sustainability related issues, including modern slavery risk.
- Peel Ports Group has become the first port group to join SEDEX (Supplier Ethical Data Exchange), the largest supplier ESG related data platform in the world. This platform will enable greater supplier transparency and risk management in all ESG related areas, including modern slavery.

## **Violations**

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

## **Our own business**

### **Written policies and procedures**

#### **Code of Conduct**

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

#### **Whistleblowing Policy**

Peel Ports Group encourages all its workers, customers and business partners to report any concerns related to its direct activities or its supply chain. This includes any circumstances that give rise to an enhanced risk of slavery or human trafficking. Our Group whistleblowing

policy is designed to make it easy for employees or officers to make disclosures without fear of retaliation.

#### Recruitment /Agency Workers Policy

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

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

#### **Training**

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

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

A new training programme is being rolled out for all Peel Ports Group employees in 2024 and this will include a module on modern slavery.

#### **Awareness Campaign**

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

#### **Audits**

In December 2022, Peel Ports Group instructed a third party to undertake a modern slavery audit in respect of a key third party labour supplier at the Port of Liverpool.

In September 2023, Peel Ports Group instructed a third party to undertake a modern slavery audit of the activities of one of its subsidiaries, BG Freight Line, the results of which are expected to be delivered in 2024.

#### **Violations**

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

## **OUR EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING**

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

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Peel Ports Group's\* slavery and human trafficking statement for the financial year ended 31 March 2023. This statement has been approved by our Board of Directors.

A handwritten signature in blue ink that reads "Claudio V.".

**Claudio Veritiero**

**CEO**

**Peel Ports Group Limited**

September 2023

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

- Peel Ports Group Limited;
- Clydeport Operations Limited;
- Port of Sheerness Limited;
- The Manchester Ship Canal Company Limited;
- The Mersey Docks and Harbour Company Limited;
- The Mersey Docks and Harbour Company (RSCT) Limited;
- The Mersey Docks and Harbour Company (L2) Limited;
- Great Yarmouth Port Company Limited;
- Heysham Port Limited;
- Coastal Container Line Limited;
- MDHC Container Services Limited;
- PPL Humber Bulk Terminal Ltd.