

PEEL PORTS GROUP ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Peel Ports Group has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or in any of our supply chains.

We are also committed to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and requiring that adequate and compliant policies and procedures are maintained and enforced related to such matters and prohibiting any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. We also expect that our contractors, suppliers and other business partners will hold their own contractors, suppliers and other business partners to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity or under our control, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners and the provisions of this policy shall be construed accordingly.

This policy does not form part of any employee's contract of employment and may be amended from time to time.

2. RESPONSIBILITY FOR THIS POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and appropriate training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group Company Secretary.

3. COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our businesses or supply chains is the responsibility of all those working for us or on our behalf in any capacity or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our businesses or supply chains at the earliest possible stage.

If you believe or suspect a breach of or conflict with this policy has occurred or that it may occur you must notify your manager or the Group Company Secretary or report it in accordance with our Whistleblowing policy (which includes a confidential helpline) as soon as possible. You should note that where reasonably practicable and appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions in any part of our businesses or supply chains constitutes any of the various forms of modern slavery, please still notify or report it as soon as possible in accordance with paragraph 3.4.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our businesses or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the HR Sharepoint site or via HR Connect.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and further training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working for us or on our behalf in any capacity or under our control if they breach this policy.