



ENVIRONMENT, HEALTH AND SAFETY PLAN 2024/25

Incorporating Group EHS Strategy & Targets

CONTENTS

Welcome	3
01. Introduction	4
02. Our Values	6
03. A reminder of our environment, health & safety (EHS) vision and goal	7
04. Safety behaviour model	8
05. Our Peel Ports journey so far	10
06. Measuring performance	12
07. Our new environment, health and safety (EHS) strategy for 2022 to 2025	14
Controlling risk	16
Learning together	17
Working in partnership	18
Caring for our assets	19
Being prepared	20
Protecting health	21
Reducing our impact	22
Leading for safety	23
08. Strategy targets	24
09. Port cluster targets & objectives for 2024/25	27
10. Prioritising & delivering the EHS strategic plan year 3 2024/25	34
Appendix I Glossary Of Terms	80
Appendix II Group Environmental Policy	82
Appendix III Group Health, Safety And Welfare Policy	84
Appendix IV Group Quality Policy	86
Appendix V Group Port Marine Safety Code Policy	88
Appendix VI Climate Change Policy	90
Appendix VII Resource Management Policy	92
Appendix VIII Esg Policy	94
Appendix IX Mobile Devices Policy	96
Appendix X Fair and Just Culture Policy	98



WELCOME

As we enter year 3 of our Group EHS strategy, I want to reflect on the progress we have made in delivering our ambitions. Our ultimate aim of zero harm continues to be our number one priority. Ensuring we all work safely, remain healthy and minimise our impact on the environment is key to doing good business.

The approach we have taken in years one and two of our strategy in reducing all injuries is something we can be proud of, the progress we continue to make in reducing the severity of injuries is also important to recognise. It is however apparent from this years performance that as we target continual reductions in injury we

will find it harder and harder to reach zero, which is why we must remain relentlessly focussed on keeping our teams, contractors and visitors safe whilst at work.

In 2022/23 we set out an ambitious plan to deliver our strategy spanning eight core themes. As we enter the final year of our current 3 year strategy these remain at the core of our deliverables:



In delivering last year's plan we introduced a new assurance process hosted on the Safety Culture platform designed to meet the evolving nature of the business. This new four tiered programme enables compliance based auditing to be undertaken at all levels from frontline checks, through site legal compliance audits to Group EHS audits and also external audits. This new programme allows us to assure our governance and report more effectively.

We recognise that our safety culture is an important aspect of reducing incidents such as injuries and damage and is why we have developed a bespoke training programme called 123 Safety & Me. This new programme which is ready for roll out will help engage our workforce in understanding how we remain safe in a port environment using our safety systems such as risk assessments, incident reporting, golden life saving rules and visible felt leadership tours to name a few.

Fitness for work continues to be an important focus area. In 2023 we introduced a new drugs and alcohol policy and testing system in conjunction with an external testing provider, with testing across four categories of post incident, for cause, random and pre-employment. As part of the strategy we trained over 140 mental health first aiders across the organisation, who have been supporting our workforce over the past 12 months providing a point of reference and help when needed.

Our net zero journey continues to be a focus with our first ESG report issued in 2023, this setting out the progress we are making against our commitments on our journey towards 2040.

These are just some of the notable achievements we have made in delivering year two of our 3 year plan and there is more to come... this year.

In this 2024/25 plan we will continue to lead the way in developing further enhancements and improvements to our environment, health and safety management systems. We will remain absolutely focussed on reducing all injuries, continuing our focus in making Peel Ports a safer, healthier and more environmentally aware business, helping us to deliver on our ambitions for the future.

Thank you

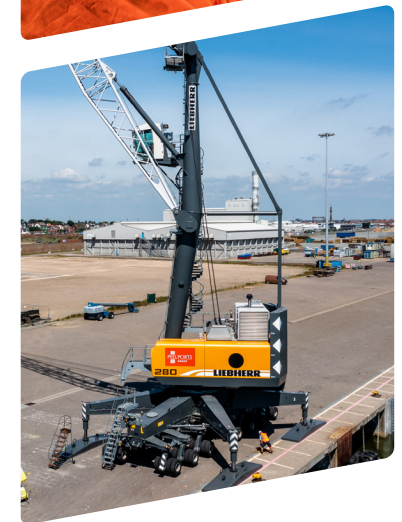
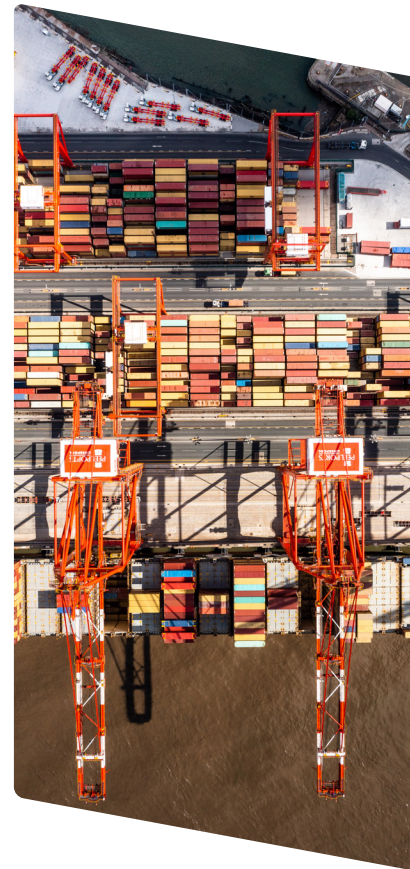
Claudio Veritiero
CEO, Peel Ports

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 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 strategy 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 (Risk Assessment/Permit To Work 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. OUR VALUES



By working **together**, we act in a **responsible** way to **enable** success and deliver **excellence**.

Together :

We succeed through collaboration.

Responsible :

We build on trust; we do things sustainably.

Enable :

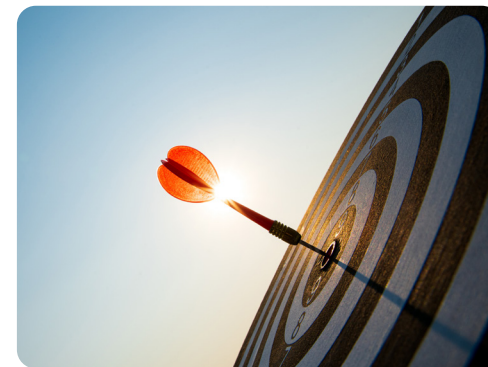
We enable success to benefit our world.

Excellence :

We deliver through performance, service and innovation.

03. A REMINDER OF 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

Achieving success at Peel Ports is something we strive for and we have come a long way in the past 5 years. Recognising the successes, we have all had in delivering improvements in our health, safety and environmental performance is important and provides us with a great foundation to build on as we embark upon our next stage of the journey.

The reduction in our lost time, restricted workday and medical treatment injuries is something we should all be proud of. But we still have more to do to achieve our ultimate goal of zero harm. We continue to set ourselves challenging year on year injury reduction targets. Your help in achieving these is critical to our success.



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 also help us identify where we need to focus our attention to continually improve.

Some key measures from 2023/24



Total Recordable Injury Rate

0.42



Audit Average Compliance Score

91%



Lessons Learnt Issued

18



VFL Tours

9388



D&A tests completed

1119



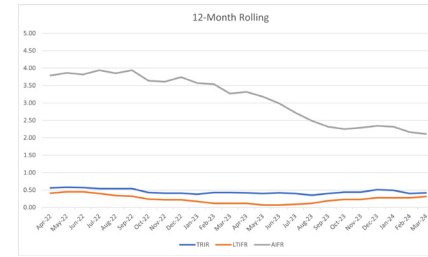
Permits Issued

6155

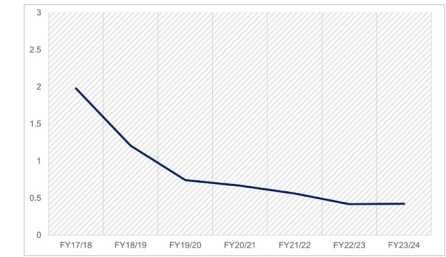
In 2021 we evolved our metric for reporting injuries at work to the wider definition of Total Recordable Injury Rate (TRIR), this has enabled us to focus not only on Lost Time Injuries (LTI) but also on Restricted Work Injuries (RWI) and Medical Treatment Injuries (MTI). Our ambition of targeting zero harm is something we collectively remain focussed on and will continue to be a key safety metric for us throughout the period of the EHS 3-year strategy 2022 - 2025.

The graphs below compare the significant progress we have made in our safety performance.

Peel Ports Group FY24 Total Recordable Injury Rate, Lost Time Rate, All Injury Rate Graph



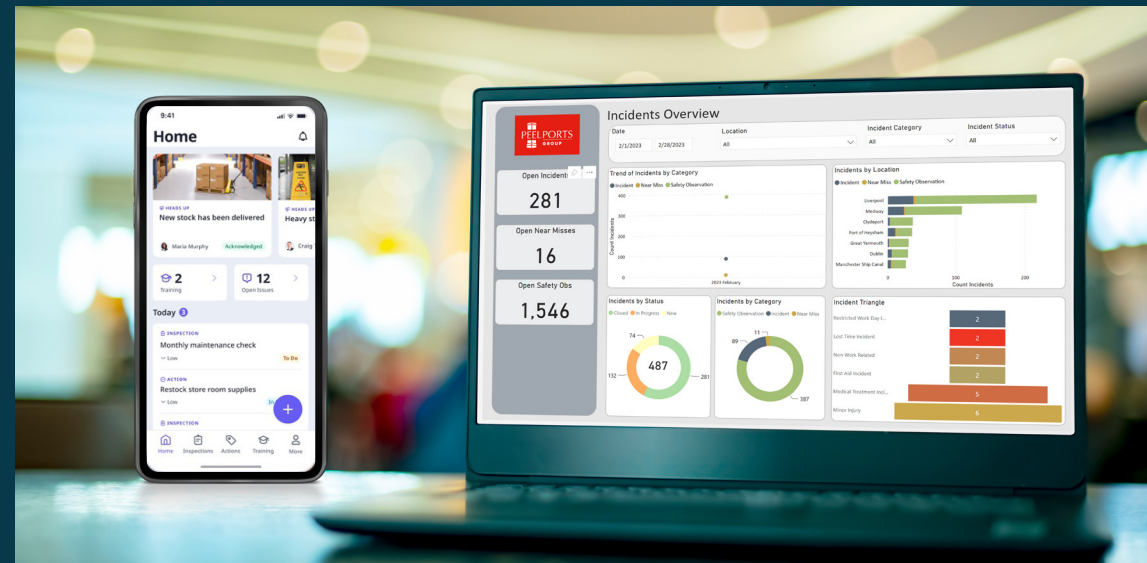
Peel Ports Group Total Recordable Injury Rate (TRIR) 2018 - 2024



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.

Safety Culture

In 2023 we introduced a new assurance programme utilising Safety Culture. This has enabled us to undertake compliance checks at all levels and report our findings through power BI dashboards. Helping us on our journey to improve the safety of our sites and reducing incidents.





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 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


LEARNING TOGETHER


WORKING IN PARTNERSHIP


CARING FOR OUR ASSETS


BEING PREPARED


PROTECTING HEALTH


REDUCING OUR IMPACT


LEADING FOR SAFETY

We will now take each strategy theme and cover it in more detail in the plan »







We are now into year 3 of the strategy and have already delivered a number of key EHS improvements and interventions. Identified against each of the theme deliverables we have indicated those projects either delivered or underway.



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

 Completed
  In Progress
  Under Development
  Year 3 Delivery



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





 Completed
  In Progress
  Under Development
  Year 3 Delivery



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.


 Completed
  In Progress
  Under Development
  Year 3 Delivery



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 us 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.







 Completed
  In Progress
  Under Development
  Year 3 Delivery



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

 Completed
  In Progress
  Under Development
  Year 3 Delivery



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 Orchid
-  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

 Completed
  In Progress
  Under Development
  Year 3 Delivery



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

 Completed
  In Progress
  Under Development
  Year 3 Delivery



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:

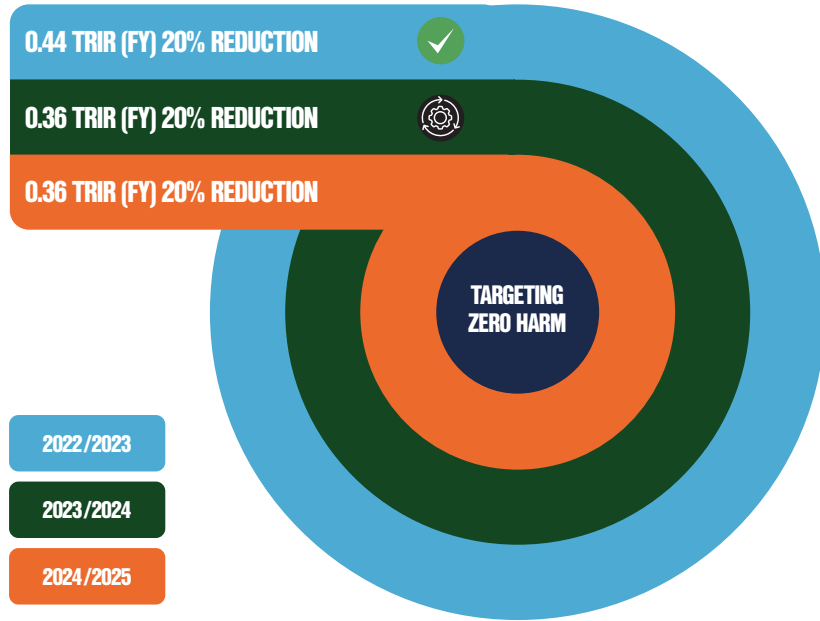
-  Continuing to deliver supervision and management soft skills training in partnership with STC INSISO (third party training provider)
-  Improving and enhancing the Visible Felt Leadership programme through continued training and the introduction of environment and security topics
-  Improving EHS 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

 Completed
  In Progress
  Under Development
  Year 3 Delivery

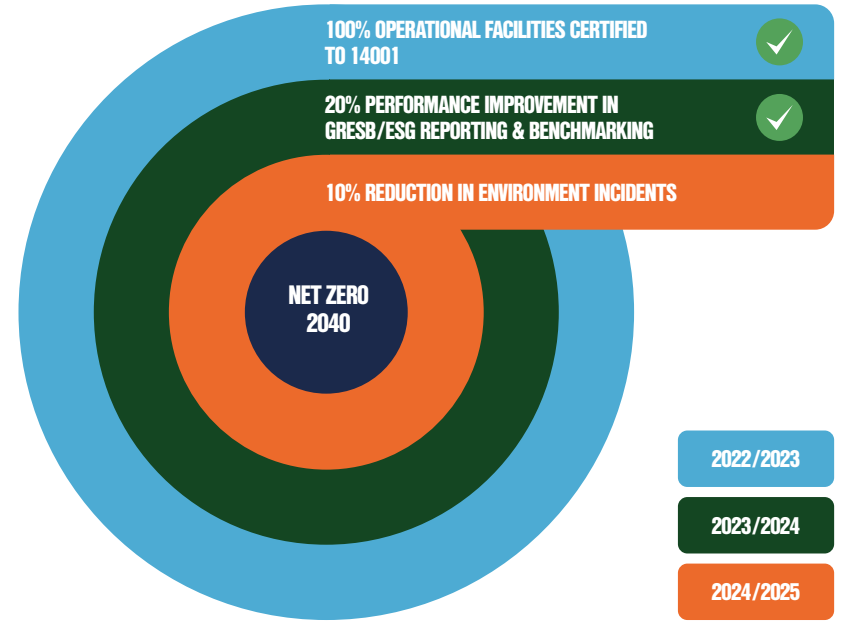
08. STRATEGY TARGETS

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.



✓ Achieved 🔄 Target Rolled Forward



✓ Achieved

GRESB (Global Real Estate Sustainability Benchmark) ESG (Environment, Social and Governance)



09. PORT CLUSTER TARGETS & OBJECTIVES FOR 2024/25

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

In support of the delivery of Peel Ports strategic goals, each port cluster is set a number of targets as set out below.

To ensure we continue to drive our injury rate down, we are expanding our key safety metrics to measure All Injury Rate (AIR) and Total Recordable Injury Rate (TRIR). All injury rate will help us to focus on all injury categories which include First Aid Injury (FAI), Minor Injury (MI), Restricted Workday Injury (RWI), Medical Treatment Injury (MTI) and Lost Time Injury (LTI), incorporating this wider reporting metric alongside our existing TRIR metric will continue to evolve our safety measurements.

The way we calculate these measurements can be found below.

$$\text{AIR} = \frac{(\text{MI} + \text{FAI} + \text{MTI} + \text{RWI} + \text{LTI}) \times 100,000}{\text{hours worked}}$$

$$\text{TRIR} = \frac{(\text{LTIs} + \text{RWIs} + \text{MTIs}) \times 100,000}{\text{hours worked}}$$

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 then divide by the calculated hours worked. So, an AIR or 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 our peers and different industry sectors.

In 2024/25 our frequency rate targets will be set as follows:

10% reduction in AIR using FY24 data as a baseline.

A reset of the FY24 target for TRIR as 0.36 reflecting the fact that the target was not fully met in FY24.

$$\text{Peel Ports AIR target for 24/25} = 1.92$$

$$\text{Peel Ports Group TRIR Target for 24/25} = 0.36$$

We have also reflected on our port performance across the year and have decided to set a dual target covering AIR and TRIR which recognises our aspiration of being a zero-harm business. In table 1 below we have set out how the TRI target aligns to business areas within the Group.

	Target Title	Owner	Due Date
Target 1	Deliver reduction of 10% in the All Injury Rate (AIR) using the new baseline set in FY24 and target a reduction in Total Recordable Injury-Frequency Rate to 0.36.	CEO	31st March 2025

In Table 1 we have set individual business target to complement our Group TRIR target for 24/25 which is 0.36, these have been apportioned based upon head count. This will provide focus for each business area and support the reduction target across the Group.

Table 1: Individual Business TRI Target (No.)

Port Clusters and Group Functions	TRI Target (FY) 24/25
Mersey	≤(3)
Clydeport	≤(2)
Containers	≤(5)
SE Cluster Ports	≤(2)
Peel Ports Logistics	≤(2)
Group Services	≤(0)

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 safety etc. across the business, it is essential that these nominated roles are maintained across the ports.

	Target Title	Owner	Due Date
Target 2	Deliver annual duty holder statements (Electrical/Fire/Asbestos) for each port cluster to the Board via the EHS Management Board	Port Directors/Group EHS Director	31st March 2025

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 2023/24 the Port clusters added to their existing ISO accreditations by establishing accreditation at the following locations:

- Clydeport (ISO 9001, 14001, 45001)
- This now concludes the process of accrediting our port clusters.

All accredited businesses will now undertake annual surveillance assessments to ensure continued accreditation

	Target Title	Owner	Due Date
Target 3	Each Port Cluster to ensure ISO certification is maintained through annual internal and external audits.	Port Directors	31st March 2025

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 4	All Group EHS annual audit actions raised in the 2023/24 audits must be closed out or included in an improvement plan with defined timescales for delivery.	Port Directors	March 2025

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 5	Ports will conduct random testing for drugs and alcohol across a minimum of 20% of the workforce. All new starters will also be screened for drugs and alcohol.	Port Directors/ Group Head of Health	March 2025

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 6	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 2025

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 7	Deliver zero enforcement actions by health & safety and environmental regulators in the UK and Ireland	CEO	31st March 2025

Fair & Just Culture

Our Fair and Just Culture; is built on trust and transparency. It takes account of the interaction people have within their working environment. It enables an organisation and its workforce to improve systems, learn from incidents and accidents and accept when someone makes an 'honest mistake'.

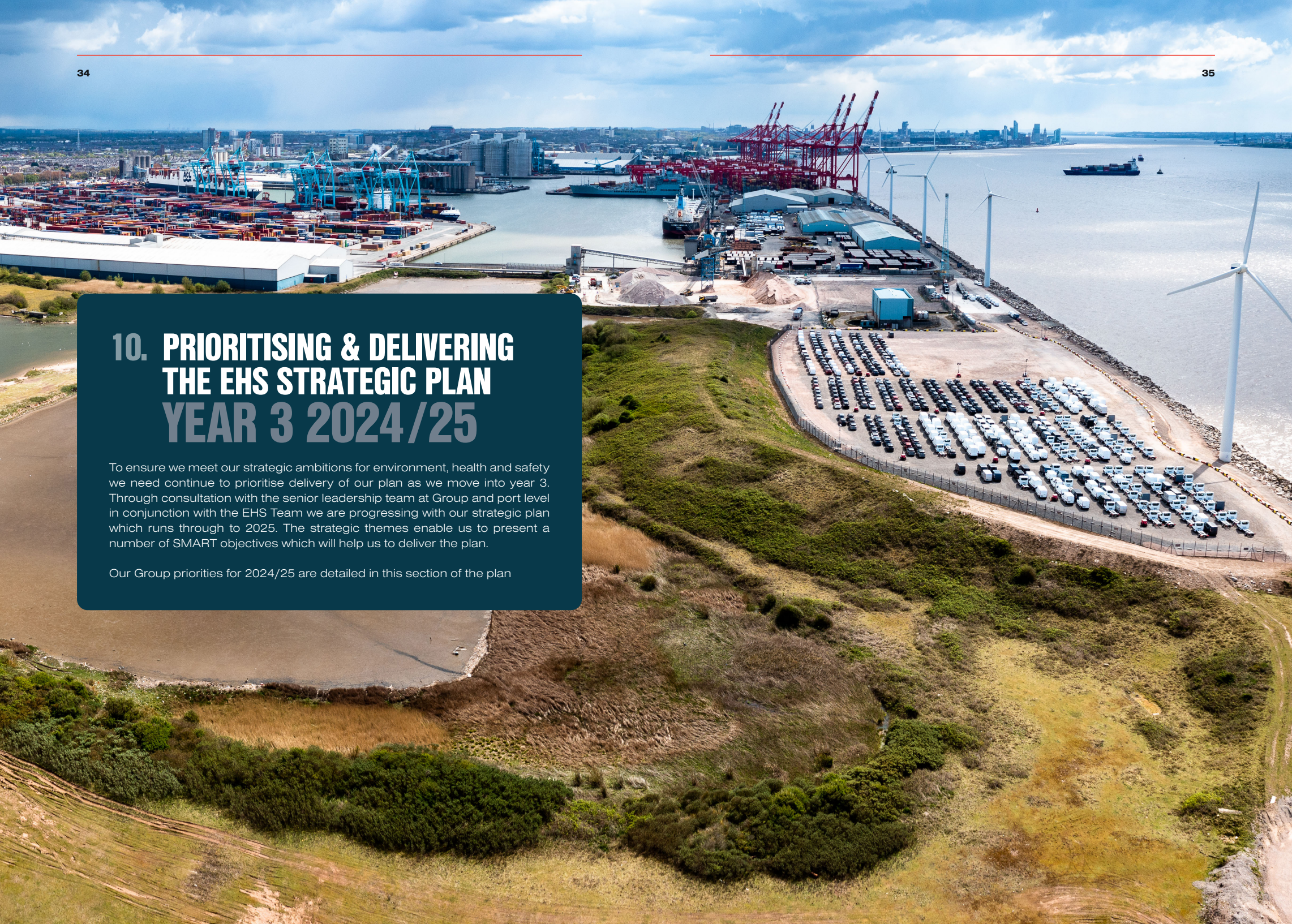
	Target Title	Owner	Due Date
Target 8	Undertake a readiness review to set out a plan for rolling out the Fair & Just Culture.	Exec Team and Port Directors	December 2024
Target 9	In-line with the readiness review plan and defined rollout timescales, undertake Fair & Just Culture assessments.	Exec Team and Port Directors	March 2025



10. PRIORITISING & DELIVERING THE EHS STRATEGIC PLAN YEAR 3 2024/25

To ensure we meet our strategic ambitions for environment, health and safety we need continue to prioritise delivery of our plan as we move into year 3. Through consultation with the senior leadership team at Group and port level in conjunction with the EHS Team we are progressing with our strategic plan which runs through to 2025. The strategic themes enable us to present a number of SMART objectives which will help us to deliver the plan.

Our Group priorities for 2024/25 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 10	Fully embed the use of the revised risk assessment system Safeguard 3 in all Port Clusters	Port Directors/ EHS Managers	March 2025



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

Continually improve the Group Permit system (Authorisation to Work (ATW) & Permit to Work (PTW)) to ensure it continues to meet business needs.

	Target Title	Owner	Due Date
Target 11	Hold 6 monthly ATW/PTW workshops with permit users to take feedback on functionality and suggested improvements.	Group EHS	March 2025
Target 12	Evaluate the usability of the ATW and PTW Power BI dashboards and make improvements to meet business needs.	Group EHS	March 2025



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 13	Undertake quarterly review of the Group EHS legal register updating the Group EHS Management System as necessary with revised, reviewed or new documents, ensuring changes are reflected in cluster registers.	Group EHS/EHS Managers	Quarterly



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 14	Issue an annual assurance plan for FY25 covering level 1, 2 and 3 audits.	Group EHS	April 2024
Target 15	Clusters to complete annual site self assessment audits using the Group EHS template in preparation for their external ISO surveillance audits.	Port Directors/ EHS Managers	March 2025
Target 16	Provide an end of year report on the annual assurance programme to present to the EHS Management Board and ESG Committee.	Group EHS Director/ Designated Person (Landside)	March 2025
Target 17	EHS managers will attend a quarterly Group EHS led meeting to provide an update on closure of SAP EHS and Safety Culture actions to ensure they are tracked through to timely closure	Port Directors/ EHS Managers	March 2025



Maintaining focus on incidents through detailed review of investigations ensuring continued business learning.

Strategic Deliverable

Undertake Incident Review Panels (IRP) at Port and Group level

	Target Title	Owner	Due Date
Target 18	Hold quarterly Incident review Panels at Group level and provide a report on the outcome to the EHS Management Board and ESG Committee	Group EHS	Quarterly



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

Create Learning and Development Steering and Working Groups to review, evaluate and report on business compliance

	Target Title	Owner	Due Date
Target 19	Hold quarterly L&D steering Groups, maintaining focus on EHS and wider business training and competence requirements	Group L&D/ Port Training Leads	March 2025
Target 20	Evaluate training delivery and training needs and provide an overview on business performance to the Quarterly EHS Management Board	Group L&D/ Port Training Leads	Quarterly



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 21	Create EHS communications plan and publish this for 2024/25	Group EHS Director/ Group Marketing	May 2024
Target 22	Take the findings from the Group EHS Safety Culture Pulse Survey (Jan 2024) and create a summary for issue across the Group.	Group Marketing/ Group EHS Director	April 2024
Target 23	Identify priority areas to improve safety culture from the survey, hold town hall meetings with the workforce and create an action plan to deliver the improvements required.	Port Directors/ COO/ MD PPL/ Exec Team Members	Aug 2024



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

Continue to improve the quality of EHS investigations

	Target Title	Owner	Due Date
Target 24	Review the quality of investigations at Incident Review Panels and Managing Responsibly Meetings to ensure continued improvement in investigation quality	Port Directors/ EHS Managers	Monthly
Target 25	Identify key learnings from incident investigations and create lessons learnt for sharing across business as appropriate.	EHS Managers/ Group EHS	March 2025
Target 26	Review open investigations and tasks monthly and ensure they are tracked to target closure within 28 days. For those which remain open, these must be reviewed monthly to ensure they are closed as soon as possible once any remaining tasks are closed.	EHS Managers/ Group EHS	March 2025



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

Review and Improve EHS SAP Incident Management across the Group.

	Target Title	Owner	Due Date
Target 27	Complete any required system updates to SAP EHS in line with software providers requirements and ensure data and system integrity is maintained.	Group IT	March 2025



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 incidents is essential in preventing a repeat event.

Strategic Deliverable

Continue to focus on 'near miss' and 'high potential controllable events' to prevent repeatable incidents.

	Target Title	Owner	Due Date
Target 28	Group EHS to review near miss/high potential controllable event reports and identify those requiring presentation to EHS Management Board and safety alerts or lessons learnt issuing into the business.	Group EHS	Monthly



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 these matters. 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 29	Continue to provide NEBOSH General Certificate training to Safety Reps/RES roles as approved by Port Directors linked to business needs and in line with the Safety Reps Charter. This will be based on a training needs evaluation and learning journey.	Port Directors/ Group L&D	March 2025
Target 30	Continue the Safety Rep/RES safety walk and reward system for those who hold a NEBOSH General Certificates	Group EHS/ Group HR	March 2025
Target 31	Hold an annual Safety Reps/RES briefing day	Group EHS/ COO/Port Directors	Oct 2024



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 32	National Unite Officer to be invited to attend Peel Ports ESG Governance Committee Quarterly	CEO/Group EHS	Quarterly
Target 33	Ports and Clusters must hold a minimum of quarterly RES/REP meetings to discuss key EHS topics, raise concerns and support the wider workforce with local engagement on key safety topics.	Port Directors/ EHS Managers	Quarterly



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 34	Deliver the output from the quayside safety working group through a documented implementation plan.	Group EHS and Group Marine	March 2025
Target 35	Review the implementation of deliverables from the quayside safety working group to ensure they have been effectively implemented in a programmed way through targeted audits.	Group EHS and Group Marine	March 2025



Our contractors and suppliers help to support us in delivering for our customers day to day. The way we interact with them and ensure they meet our environment, health and safety requirements is key to keeping everyone safe whilst working at our ports. Our understanding of their safety systems, training, insurance and other business requirements helps us to achieve safe day to day operations.

Strategic Deliverable

Integrate key suppliers and contractors through risk based screening and continued evaluation

	Target Title	Owner	Due Date
Target 36	To create a system and documented process which provides visibility across the ports of Peel Ports contractors & suppliers	Head of Procurement	March 2025
Target 37	Revise and enhance the process for onboarding new contractors and suppliers	Head of Procurement	March 2025
Target 38	Provide a platform for evaluating EHS performance of contractors and suppliers to ensure continued compliance with business processes	Head of Procurement	March 2025
Target 39	Create a training package to support the effective implementation of the new system and process for contractors & suppliers	Head of Procurement	March 2025





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.



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

Improve asset replacement and maintenance strategies to reduce risk and improve efficiency

	Target Title	Owner	Due Date
Target 40	Undertake a review of the existing group asset replacement and maintenance strategy to ensure findings from EHS investigations are being incorporated.	Group Engineering Director/COO	March 2025



Keeping our sites tidy is an important aspect of our safety culture, it prevents incidents and accidents from occurring through poor housekeeping. It also improves our productivity as we always know where something is when we need it and ensures we have the right tools for the job.

Strategic Deliverable

Embed effective 5s processes to ensure our assets remain clean and tidy and waste is minimised

	Target Title	Owner	Due Date
Target 41	All ports to undertake an annual 5S audit using the Level 1 audit in safety culture.	Port Directors/ EHS Managers	December 2024
Target 42	The findings of the audit above will be used to evaluate the effectiveness of existing training and guidance with improvements implemented where required.	Group EHS/EHS managers	March 2025





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

Create a crisis management framework for Peel Ports Group

	Target Title	Owner	Due Date
Target 43	To ensure leadership and management familiarity with the enhanced Group Crisis Management Plan	Port Directors/ Exec team	March 2025
Target 44	Develop a crisis management exercise to test the application of the Group Crisis Management Plan within Peel Ports, this will incorporate the Port Directors, Group Directors and Exec Team	Group EHS/ Group Harbour Master/COO	March 2025
Target 45	Each Port Cluster to enhance their own Port Emergency Plan aligned to the Group Crisis Management plan using the template FRM 350 PPG HSE	Group EHS/ Group Harbour Master/ COO	March 2025

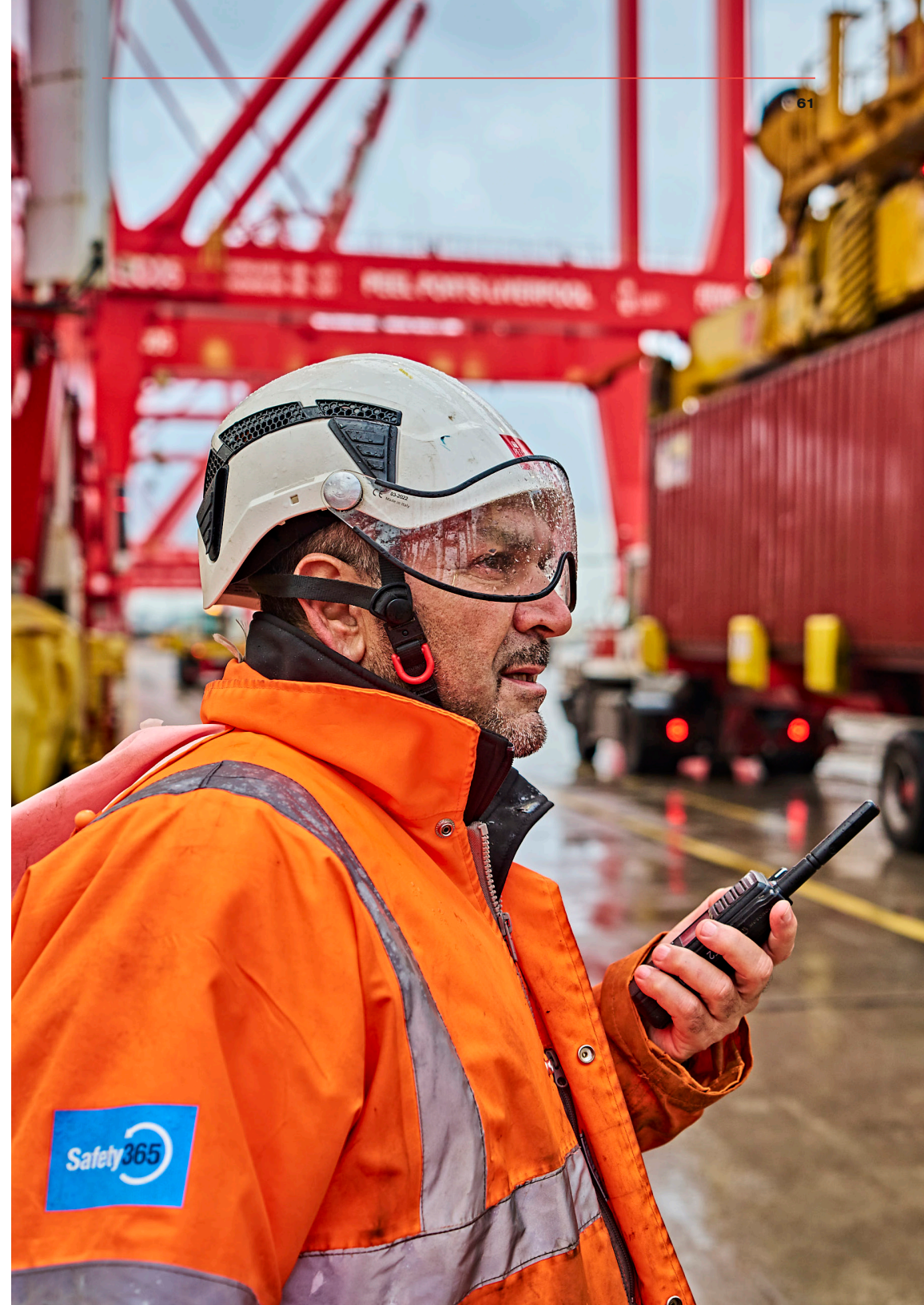


Understanding how our teams and plans work together to deliver an effective emergency response is critical for ensuring we effectively respond and recover from incidents which may occur within our ports.

Strategic Deliverables

Establish Business Continuity Policy, Procedures and processes.
Develop and Implement a combined landside and marine exercise plan to test organisational resilience.

	Target Title	Owner	Due Date
Target 46	Create a Business Continuity Policy and Procedure to define the process by which Peel Ports must be prepared to recover from crisis and emergency events.	Group EHS/ Group Marine	December 2024
Target 47	Port teams to start work on developing and enhancing their own business continuity plans in line with the policy and procedure as set out in the target above.	Port Directors/ Marine Teams	March 2025
Target 48	Each Port Cluster to develop a local exercise programme to test their Port Emergency Plan, this should include both landside and marine activities.	Port Directors/ Marine Teams	March 2025





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

Improve and continue to embed manager guidance on occupational health processes with regard to absence management and wellbeing.

	Target Title	Owner	Due Date
Target 49	Devise a manager-centric area within the hub which holds a suite of guidelines and manager training required to effectively case manage those personnel who are away from work due to illness or an injury.	Group Head of Health	March 2025



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 Orchid.

	Target Title	Owner	Due Date
Target 50	Review Orchid software after 6 months to ensure effectiveness in meeting service needs and provision of reporting data.	Group Head of Health	December 2024
Target 51	Evaluate occupational health reporting dashboards and amend as necessary to reflect additional data capture provided through the Orchid software.	Group Head of Health	March 2025



We all spend a lot of time at work which enables a 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

Embed the mental health strategy

	Target Title	Owner	Due Date
Target 52	Maintain a network of qualified and informed Mental Health First Aiders (MHFA) in line with the Group's commitment of up to 5% of the workforce supported by appropriate materials and training on the Group's health hub.	Port Directors/ Group Head of Health	March 2025
Target 53	Provide internal information for all new starters on the mental health support available via the Group induction process.	Group Head of Health	March 2025



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

Continual monitoring, evaluation and delivery of the health surveillance and screening programme to ensure ongoing legal compliance.

	Target Title	Owner	Due Date
Target 54	Monitoring of risk to ensure all areas where health surveillance is required remains appropriate through reviewing the health hazards and tasks overview matrix in conjunction with the Port Clusters.	Group Head of Health/Port Directors	March 2025
Target 55	Identify new starters who require health surveillance and screening, ensuring baseline tests are completed prior to medical fitness advice being issued.	HR/Group Head of Health	March 2025
Target 56	Ensure 95% of all health surveillance and screening is achieved in the year	Group Head of Health	March 2025

Strategic Deliverable

Improve occupational health and wellbeing through targeted education and support programmes

	Target Title	Owner	Due Date
Target 57	Publish the annual health promotion plan and commence delivery of the programme on a priority led basis	Group Head of Health	April 2024
Target 58	Maintain up to date information on the health hub with materials relating to the health promotion activities across the business.	Group Head of Health	March 2025



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

Strategic Deliverable - Develop and implement a musculoskeletal (MSK) strategy

	Target Title	Owner	Due Date
Target 59	Identify areas/tasks where MSK issues are at risk via occupational data review and injury evaluation.	Group Head of Health/ Group EHS/EHS Managers	March 2025
Target 60	Embed physiotherapy and ergonomic services within the organisation to address potential issues early and minimise the risk of musculoskeletal problems.	Group Head of Health	March 2025
Target 61	Provide management training in managing musculoskeletal issues to minimise the risk of injury or long-term debility.	Group Head of Health	March 2025

Strategic Deliverable

Coordinate, monitor and evaluate the effectiveness of the Drug and Alcohol testing programme.

	Target Title	Owner	Due Date
Target 62	Review service levels provided by Hampton Knight after year 1 of the contract to ensure ongoing effective delivery, recommend changes and improve performance where required.	Group Head of Health	March 2025



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.



Having an effective reporting system for environmental incidents allows improved capture and management of data and information.

Strategic Deliverable

Enhancing and improving SAP EHS reporting processes for environmental incidents.

	Target Title	Owner	Due Date
Target 63	Improve environmental reporting to reduce reclassifications by 10% across the year using 23/24 as a baseline.	Group EHS/ Port Directors	March 2025
Target 64	Revise and enhance the process of environmental near miss reporting, sharing lessons learnt where appropriate to prevent incidents.	Group EHS	March 2025



Ensuring our operations minimise the environmental impacts of oil spills by improving education, understanding root cause and speed of response.

Strategic Deliverable

Improving the management of oil spills across Peel Ports.

	Target Title	Owner	Due Date
Target 65	Each port to undertake a minimum of an annual oil spill drill exercise to test response capabilities and equipment.	Port Directors	March 2025
Target 66	Include a review of oil spill investigation and response in the Group annual audits for 24/25.	Group EHS	March 2025



Our operations utilise resources and create waste, we can minimise the use of materials if we understand the amount we use. Reducing our inputs have 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 67	Embed through the use of duty of care focussed audits improvements in waste transfer note compliance.	Port Directors/ EHS Managers/ Group EHS	March 2025
Target 68	Hold quarterly environmental management working group meetings with representatives across the Group including waste and compliance.	Group EHS	6 monthly
Target 69	Measure and monitor waste arisings inline with the following target- Achieve a 40% recycling rate across all non hazardous waste types	Port Directors/ Group EHS	March 2025



Ensuring our operations minimise impact on our neighbours and create benefits to the localities in which we operate is an essential component of our ESG Strategy. Working together to achieve this through improved engagement and enhancement programmes will help us to achieve this.

Strategic Deliverable

Enhance amenity for our neighbours through targeted communications & improvement programmes

	Target Title	Owner	Due Date
Target 70	Undertake amenity based assessments such as noise, dust, lighting in areas where there has been an increase in nuisance complaints and use findings to effect improvements.	Port Directors/ Group EHS	March 2025
Target 71	Improve the capture of environmental nuisance complaint information, through updates to Group process, procedure and training.	Group EHS	March 2025





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 teams, supervisors, managers and leaders all have a key role to play in developing our safety culture. Understanding the way we work and how the job, the individual and the organisation have a role to play in this, is aligned to the HSE's Human Factors model and remains a focus for the training and upskilling we deliver.

Strategic Deliverable

Deliver the new 'Behavioural Safety' training programme (123 Safety & Me)

	Target Title	Owner	Due Date
Target 72	Create a roll out plan for the behavioural safety programme and commence the training utilising the 123 Safety & Me inhouse accredited trainers, ensuring the training is recorded in LMS.	EHS managers/ Port Directors	March 2025
Target 73	Using the external training provider to review the 123 Safety & Me trainers 6 months after training deployment to ensure consistency is being maintained and to take any feedback for future enhancements to the training materials.	Group EHS Director	March 2025



Peel Ports have a well-established system for Visible Felt Leadership (VFL) tours, this enable the organisation to show leadership for health and safety and creates a culture of two way dialogue for continual improvement.

Strategic Deliverable

Improve Visible Felt Leadership (VFL) programme through continued training and introduction of Environment and Security topics.

	Target Title	Owner	Due Date
Target 74	Review the updated VFL platform 6 months after launch and determine if further improvements can be made to its functionality.	Group EHS	December 2024
Target 75	Improve the existing VFL reporting dashboard to provide better output for analysing data which will support the 123 Safety & Me behavioural safety programme.	Group EHS	March 2025
Target 76	Update and improve the VFL training package to incorporate those changes implemented through the targets above.	Group EHS	March 2025



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

Review the effectiveness of the new 'Fair & Just' culture model and process.

	Target Title	Owner	Due Date
Target 77	Create a roll out programme for the Fair & just culture and seek agreement on the priority order of locations with the Port Directors ahead of deployment, complete associated training.	Group EHS/Port Directors/EHS Managers	March 2025
Target 78	Ensure Fair & Just culture is included in the onboarding process for all new employees in the areas it has been deployed	Group HR	March 2025

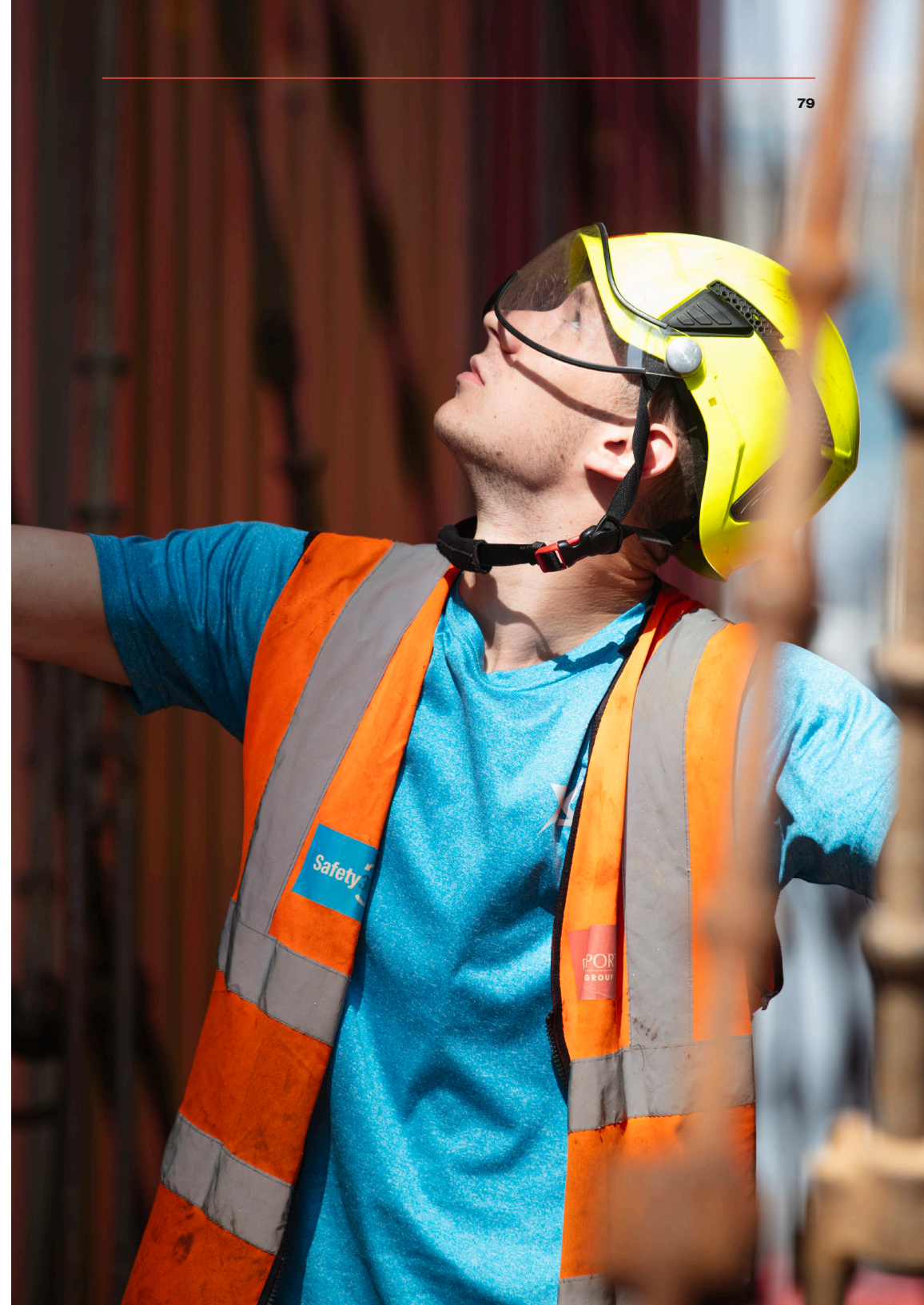


Our safety health and safety behaviours and golden rules help us to convey our culture consistently across the organisation. They help us frame our expectations for employees, contractors, third party labour and all other visitors to our sites. They are a key part of our EHS branding.

Strategic Deliverable

Update, enhance & refresh Peel Ports Golden Rules

	Target Title	Owner	Due Date
Target 79	Communicate the proposed updates to Safety 365 branding to the Port Directors and EHS Managers and receive sign off from the Exec Team ahead of business relaunch in support of the new 3yr EHS strategy from June 2025.	Group EHS/ Group Marketing	March 2025



APPENDIX I

GLOSSARY OF TERMS

INJURY REPORTING

All Injury Rate (AIR):

Our headline safety metric recording all injuries which incorporates Lost Time Incident (LTI), Restricted Workday Incident (RWI), Medical Treatment Incident (MTI), First Aid Injury (FAI) and Minor Injury (MI) and divides these by working hours to create a frequency rate. To ensure we are able to utilise this for benchmarking purposes we factor this to 100,000 work hours.

Total Recordable Injury Rate (TRIR):

A key safety metric which incorporates Lost Time Incident (LTI), Restricted Workday Incident (RWI) and Medical Treatment Incident (MTI) and divides these by working hours to create a frequency rate. To ensure we are able to utilise this for benchmarking purposes we factor this to 100,000 work hours.

Total Recordable Injury (TRI):

An injury which includes any lost time (LTI), a restriction (RWI) or requires medical treatment.

INJURY CATEGORISATION

Total Recordable Injury Rate (TRIR):

All injuries should be recorded once, in the highest appropriate category (see below).

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

Non Work Related (NWR):	An incident which has occurred but is not out of or in connection with the work activity. NB An accident is work related if any of the following played a significant role: the way the work was carried out, any machinery, plant, substance or equipment used for the work or the condition of the site or premises where the accident happened.
Road Traffic Incident (RTI)	A road traffic collision on site which cause injury (injury categorisations must be recorded in EHS SAP as the same as the injury categories of LTI, RWI etc.
Road Traffic Incident Non Work Related (RTI-NWR)	A road traffic collision which has occurred but is not out of or in connection with the work activity or occurs on the public highway.
High Potential Controllable Event (HPCE)	Any type of event that could, in any other circumstances, have realistically resulted in a fatality, multiple fatalities or serious injury. It also includes those events where significant damage could have been caused to the environment and fixed or mobile assets and whereby the reputation and security of the business may have been compromised.
Spill:	Unintentional release of a commodity or chemical from its primary containment.

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.

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.

Claudio Veritiero
CEO, Peel Ports Group

V6.6 - April 2024

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.

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 Manging 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 Manging 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.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX VI

CLIMATE CHANGE POLICY

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.

Claudio Veritiero CEO
Peel Ports Group

APPENDIX VII

RESOURCE MANAGEMENT POLICY

RESOURCE MANAGEMENT POLICY



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.

Claudio Veritiero CEO
Peel Ports Group

ENVIRONMENTAL 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 our supplier and 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 improving our standards, 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.

Claudio Veritiero
CEO

November 2022

APPENDIX IX

MOBILE DEVICES POLICY

MOBILE DEVICES 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.

Claudio Veritiero
CEO, Peel Ports Group

APPENDIX X

FAIR AND JUST CULTURE POLICY

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.

Claudio Veritiero

CEO - Peel Ports Group

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