

**Peel Ports Group**

# **Modern Slavery Statement**

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## **Introduction**

This is the FY25 Modern Slavery Statement of Peel Ports Group Ltd, the parent company for the Peel Ports Group of companies, on behalf of Peel Ports Group, pursuant to the Modern Slavery Act 2015 (“the Act”).

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

Peel Ports Group owns port facilities and operates as the Statutory Harbour Authority for the Port of Liverpool, the Manchester Ship Canal, the River Medway and Sheerness Harbour, parts of the area along and around the River Clyde, Ardrossan Harbour, Twelve Quays at Birkenhead Docks and Heysham Port. Peel Ports Group also operates port facilities at Dublin Port and Great Yarmouth Port where it acts as agent for the Statutory Harbour Authority and Humber Bulk Terminal. Peel Ports Group also has a shipping line division, BG Freight Line, which is based in the Netherlands and provides a short sea and feeder container services between the UK, Ireland and mainland Europe as well as a logistics business, Peel Ports Logistics. BG Freight Line and Peel Ports Logistics have their own separate Modern Slavery Statements.

## **Supply Chain**

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

Having a robust, ethically sourced and diverse supply chain is a non-negotiable priority. Our goal is to create a transparent and accountable environment, ensuring that Peel Ports Group and its stakeholders uphold high ethical standards and actively work to prevent modern slavery and human trafficking.

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

- When selecting and pre-qualifying our supply chain, suppliers are required to respond to tailored pass/fail questions covering ethical and sustainable procurement including whether their organisation is compliant with the Act,

Suppliers who are not demonstrably compliant with the Act are not permitted to work with Peel Ports Group.

- Peel Ports Group's template agreements used for the purchase and supply of goods and services and its standard purchasing terms and conditions (which are incorporated into all purchase orders) include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and require that adequate and compliant policies and procedures are maintained and enforced in relation to such matters and prohibit any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. They also enable us to audit compliance in respect of such matters and terminate and cease dealing with any supplier in the event of a breach of any such obligations.
- All new suppliers are required to sign up to Peel Ports Group's Supplier Code of Conduct which contains our requirements for sustainable and ethical supply management, including those relating to Modern Slavery.
- Peel Ports Group holds the Chartered Institute of Procurement and Supply (CIPS) Corporate Mark for ethical procurement and supply management. This corporate accreditation demonstrates the proactive steps that we have taken to safeguard against unethical conduct in procurement and supply management including in relation to Modern Slavery.
- Peel Ports Group utilises SEDEX (Supplier Ethical Data Exchange), the largest supplier ESG related data platform in the world. This platform enables greater supplier transparency and risk management in all ESG related areas, including modern slavery.

### **Policies**

Peel Ports Group's Modern Slavery Statement is supported by the following policies:

- Anti-Slavery And Human Trafficking Policy
- Anti Bribery, Corruption and Fraud Policy
- Whistleblowing Policy
- ESG Policy
- Supplier Code Of Conduct 2023

All of these policies are publicly available here: <https://www.peelports.com/group-policies>

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

### **FY25 Risk Assessment**

Recent research published in 2025 shows that the UK construction sector has the second-highest number of modern slavery victims after the health and social care sector.

In light of this, Peel Ports Group engaged a third party independent consultancy, Align Ltd, to conduct a modern slavery risk assessment of third party construction workers engaged on the group's construction projects.

This risk assessment included several interviews with key staff members at Peel Ports Group and a review of Peel Ports Group's current approach, policies and efforts to protect individuals and its supply chain against the risk of modern slavery.

The risk assessment also included a site assessment of a Peel Ports Group construction project using an assessor who was able to draw on their lived experiences.

The insight from this risk assessment has provided a clear action plan, including a requirement for further training of Site Managers and an annual site assessment of one of Peel Ports Group's construction projects.

The inclusion of Lived Experience within this risk assessment resulted in the Peel Ports Group meeting the highest Human Rights-informed approach and is aligned with section 3.2.1 of the Home Office 2025 Transparency in Supply Chains guidance.

### **Training On Modern Slavery**

We continue to ensure that all new employees are informed of their responsibilities regarding modern slavery as part of their HR induction and we introduced a new online learning portal which includes annual refresher training on modern slavery.

### **FY26 Focus Areas**

#### **A Commitment to Improvement**

We will build on our modern slavery statement year on year by identifying tangible actions and tracking and monitoring their effectiveness. We will report back on our progress via our modern slavery statement.

### Third Party Construction

We will provide further training for Site Managers and carry out an annual site assessment of one of Peel Ports Group’s construction projects.

### Third Party Labour Suppliers

We will carry out a modern slavery risk assessment of our third party labour suppliers.

### Actions Carried Out in FY25 and Proposed Actions for FY26

Focus Area	What we said we would do in FY24	What we did in FY25	What we will do in FY26
<b>Commitment to change</b>	Continue to improve our modern slavery statement.	We updated our statement to report back on the actions we committed to carry out in the previous year, ensuring transparency and accountability.	Maintain and consider ways to improve our modern slavery statement.
<b>Supply chain due diligence</b>	Maintain/improve supply chain management practices.	The charterparty terms of our subsidiary, BG Freight Line, have been updated to require modern slavery due diligence.	Conduct an audit of those who have signed the new charterparty terms, verifying their compliance with its guidance.
<b>Risk Assessment</b>	Carry out a modern slavery risk assessment of a	Align Ltd were engaged to conduct a modern slavery	Carry out a modern slavery risk assessment of our

	high-risk area within our business.	risk assessment of third party construction workers engaged on the group's construction projects.	third party labour suppliers.
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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Peel Ports Group's\* slavery and human trafficking statement for the financial year ended 31 March 2025. This statement has been approved by our Board of Directors.



**Claudio Veritiero**  
**CEO**  
**Peel Ports Group Limited**  
 September 2025

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

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