

## OVERVIEW

PD Ports is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. We will enforce strict compliance with the Modern Slavery Act 2015 and do not and will not tolerate slavery and human trafficking in our business or within our supply chains.

## STRUCTURE OF THE ORGANISATION

PD Ports is one of the UK's major port groups. Employing over 1,200 people, we are based in the North East of England and operate from locations across the UK. We work with a range of suppliers and service users and the nature of our business means that we are a possible channel for trafficking, as a port and logistics company, as well as being an employer and a customer of organisations in our supply chain. For this reason, we already have robust controls in place to recognise and prevent illegal trafficking through the port, warehouse and logistics operations, via our dedicated Harbour Police and Security teams. Further information on the business can be found on the PD Ports website via the following link <http://www.pdports.co.uk/en/corporate/about-us/>

## ACTION

The introduction of the Modern Slavery Act 2015 raised awareness of the risk of slavery and human trafficking in the business and its supply chain. Our initial action has been to determine the company's stance as set out in this statement. We will also be reviewing our existing procedures which are most relevant to the eradication of the risk of slavery and human trafficking in our business and supply chain and appointed an appropriate person to review their suitability. The main policies identified are procurement and recruitment, but the whistleblower, anti-bribery and corruption and the disciplinary policies will also be relevant. As a result, our Legal, Human Resources and Procurement Departments are working to ensure compliance with the Modern Slavery Act 2015. Training needs are also being assessed within the business.

## POLICIES

As part of our commitment to combating modern slavery and human trafficking, we will review our recruitment, procurement and anti-bribery and corruption policies, procedures and practices. We will also raise awareness within our workforce to identify any other working practices which might need to be addressed to mitigate the risk of slavery and human trafficking by monitoring our supply chain and the potential risk of being inadvertently involved in slavery or human trafficking.

Our procedures will be designed to:

- establish and assess areas of potential risk in our own business and supply chains
- monitor potential risk areas in our own business and supply chains
- mitigate the risk of slavery and human trafficking occurring in our own business and supply chains
- train employees and managers to be aware of potential risks and to report their suspicions to the appropriate people within PD Ports
- protect whistleblowers within the business

## CONTRACTUAL ARRANGEMENTS WITH SUPPLIERS

We will also require our suppliers to either comply with our policies or have in place equivalent policies, and adhere to the same high standards. For example, our standard purchasing terms and conditions ensure that suppliers commit to complying with their obligations under the Modern Slavery Act 2015 and any other relevant legislation.

**TRAINING**

We will invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through the training programmes we will deliver, employees will be encouraged to identify and report any potential breaches of the organisation's Anti-Slavery and Human Trafficking Policy. Employees will be taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate the risk of slavery and human trafficking from our business and supply chains. This will be incorporated within our Code of Business Conduct and Ethics training in the first instance.

**RISK ASSESSMENT**

We have a zero tolerance of slavery and human trafficking. In the event we identify a potential risk, a full investigation will be undertaken to determine whether there has been breach of the Modern Slavery Act 2015 and what action needs to be taken to remedy such breach and prevent such a risk arising in the future.

Employees and third parties, performing duties on behalf of PD Ports, as well as customers and suppliers, are required to draw attention to circumstances where they believe that there may have been breaches of this statement or related improper behaviour, whether by employees of PD Ports or any third parties in relation to the business of PD Ports. This can be reported directly to a line manager, or via the PD Ports Whistleblower procedure, or to the person named in the following paragraph.

**EFFECTIVENESS**

We have appointed our Group HR Director to be responsible for reviewing this statement and recommend any actions arising from such review. The first review will take place by June 2018.

**SIGN-OFF**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes PD Port's anti-slavery and human trafficking statement for the financial year commencing 1<sup>st</sup> January 2017 and ending 31<sup>st</sup> December 2017.

Signature:

Russ McCallion, Group HR Director  
PD Ports Limited  
December 2017

**REVISION RECORDING****Policy Owner:** Senior HR Officer**Review Date:** June 2018

<b>Rev Number</b>	<b>Amendment</b>	<b>Date</b>
001 – 2017-03 KT	Anti-Slavery and Human Trafficking Statement (draft) created.	March 2017
002 - 2017-12 KT	Statement finalised for 2017 financial year.	December 2017