

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 have and continue to enforce strict compliance with the Modern Slavery Act 2015. We 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 continue to monitor the suitability of our existing procedures which are most relevant to the eradication of the risk of slavery and human trafficking in our business and supply chain. The main policies identified are procurement and recruitment, but the whistle-blower, anti-bribery and corruption and the disciplinary policies are also relevant. As a result, our Legal, Human Resources and Procurement Departments continue working to ensure compliance with the Modern Slavery Act 2015. Training needs have been assessed throughout the business and a training plan has been implemented which has been rolled out firstly to the Executive Team. This will be followed by the Human Resource Team, Commercial, Procurement and Payroll Teams. In addition to the training, during 2019 the Procurement Team will be inserting a section on Modern Slavery within their Supplier Code of Conduct.

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 whistle-blowers within the business

CONTRACTUAL ARRANGEMENTS WITH SUPPLIERS

We also continue to require our suppliers to either comply with our policies or have in place equivalent policies, and adhere to the same high standards. 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 continue to be diligent and maintain 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 Whistle-blower procedure, or to the person named in the following paragraph.

EFFECTIVENESS

Our Group HR Director continues to be responsible for reviewing this statement and providing any recommended actions to be taken arising from such a review.

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 1st January 2019 and ending 31st December 2019.

Signature:



Russ McCallion, Group HR Director
PD Ports Limited
December 27th 2018