

## P&O FERRYMASTERS HOLDINGS LIMITED POLICY GROUP STATEMENT

P&O Ferrymasters Holdings Limited and its subsidiary undertakings (referred to as 'P&O Ferrymasters') means P&O Ferrymasters Limited and any other company within the P&O Ferrymasters Holdings Limited Group

### Social Responsibility

P&O Ferrymasters recognises that its business must be conducted in a socially responsible way. We are committed to the achievement and maintenance of the highest standards in all aspects of our activities

P&O Ferrymasters provides European tailor-made transportation and logistics services. Specialising in the design and delivery of innovative and flexible supply chain solutions. The company provides services across the continent of Europe, with offices in 12 European countries (Belgium; Eire; France; Germany; Hungary; Italy; Poland; Romania; Spain; The Netherlands; United Kingdom; Ukraine). P&O Ferrymasters works with haulage, rail and sea sub-contractors across Europe to deliver its services.

The Managing Director, Bas Belder, champions this policy; his responsibility is to ensure that managers have the belief, competence and resources to implement the policy and achieve its aims.

Our staff in all countries are reminded that achieving and successfully maintaining the highest standards relies on everyone sharing responsibility for the commitments set out in this policy.

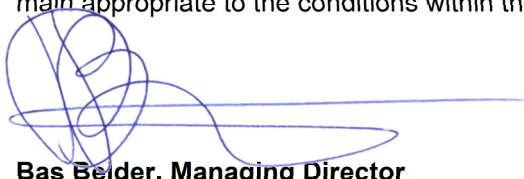
P&O Ferrymasters is committed to:

- Abiding by the laws of the countries in which it operates.
- Preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.
- Prohibiting the use of child labour in its activities and by its sub-contractors.
- Creating and maintaining a working environment in which the capabilities of all employees are developed and to provide competitive terms and conditions.
- Recognising and respecting the human rights, dignity and needs of all employees.
- Conducting its business with honesty and integrity and applying the highest ethical standards.
- Seeking to contribute to the well-being and development of the communities in which it operates.
- Protecting and enhancing the health, safety and welfare of its staff and seeking to avoid or minimise any adverse environmental impacts.
- Building and maintaining open and effective two way communications on environment and community involvement.

P&O Ferrymasters implements this policy through the following controls measures:-

- Business risks concerning social responsibility are identified and evaluated via the Corporate Risk Register and reviewed in line with the Corporate Risk Assessment Procedure.
- Subcontractors are approved, monitored and performance measured in line with the Logistics Service Provider Approval Procedure and Carrier Management – Carrier Selection, Performance monitoring, Review and Auditing Procedures.
- Subcontractors work to P&O Ferrymasters Terms and Conditions of Subcontracting, including compliance with applicable laws and regulations.
- Incidents of non-compliance are recorded, reported and investigated in line with the Incident Management and Reporting Procedure
- Subcontractors may be “unapproved” for non-compliance in line with Logistics Service Provider Approval Procedure.
- P&O Ferrymasters employees can raise concerns about Social responsibility risks in line with the Whistle Blowing Policy.
- Employment and checks on new employees are completed in line with P&O Ferrymasters Recruitment and Selection Policy.
- Any incident involving a P&O Ferrymasters employee is managed in line with the P&O Ferrymasters Disciplinary Policy and Procedure
- An understanding amongst staff of the issues of social responsibility is developed through training, in line with Training and Development Policy.
- The social, ethical and environmental implications of all investment decisions are considered.
- Procedures are reviewed annually and / or if a material change in legislation or in the company's operation occurs.

The aspirations detailed in this Policy are neither fixed nor exhaustive. P&O Ferrymasters recognises that change can occur quickly and this policy will be reviewed at least annually in order to ensure that our stated intentions remain appropriate to the conditions within the communities in which we operate.



**Bas Beider, Managing Director**

**14th June 2016**