



**Modern Slavery and Human Trafficking Statement
2024**

Introduction

P&O has pledged to conduct its business in a fair, honest, and open manner. We are committed to zero tolerance of any form of slavery, human trafficking or child labour and all forms of corruption and bribery, both directly and indirectly within our supply chains, associated with these criminal acts.

This statement applies to P&O Ferries Holdings Ltd. For ease of reference throughout this document the parts of the business covered may be referred to as “P&O”, “we” or “the Company.” In addition, the statement refers DP World Ltd as “DP World”, “the group” or “DPW”.

Our Organisation

With more than 185 years of rich heritage and experience, P&O Ferries has been connecting the UK and Europe for nearly two centuries. DP World acquired P&O Ferries in 2019 due to P&O Ferries market leading European transportation and logistics model to aid in playing a wider role in the global supply chain.

P&O Ferries sail across the English Channel, North Sea, and Irish Sea, carrying both passengers and freight between the UK and Europe, as well as between Great Britain and Northern Ireland. The company also owns and operates two ports: Larne in Northern Ireland, and Cairnryan in Scotland.

Our fleet of ships includes two hybrid-powered state of the art Fusion Class vessels being in service since 2023–2024. With the arrival of our new ships we are on our way to making further substantial reductions our carbon footprint, having already cut our carbon emissions on the Channel crossing by 85,000 tons. Taken together, our ships make nearly 20,000 sailings every year to aid the UK’s logistics and travel sector.

Our Policies and Procedures on modern slavery and human trafficking

Our commitment to ensuring that there is no modern slavery or human trafficking anywhere in our business and supply chains globally is delineated in our Company and Group Policies. P&O Ferries annually revised Modern Slavery and Human Trafficking Policy describes our approach within the organisation and with our suppliers. This policy also explains how our employees and value chain workers can report any suspected incidents or concerns and how we will treat such reports.

Key policies and procedures concerning modern slavery and human trafficking include:

- Regularly monitoring key strategic risks as part of our ESG commitment and reporting these to Senior Management, DPW Audit and Risk Committee and the Board of Directors. These risks include threats to human rights and ensuring we conduct ethical business activities.

- DPW Group Human Rights Policy and Statement, establishing a framework for our actions and informing stakeholders of our position on human rights.

- Our Whistleblowing Policy, setting forth a system in which employees and third parties, including employees from suppliers, can securely report concerns, suspicions or knowledge of

misconduct or unethical behaviour, including any concerning slavery, human trafficking and human rights violations. Reporting parties are protected from retaliation in any form.

- Procurement policies and procedures that guide our business model to manage supply chains effectively. These set out minimum criteria for P&O Ferries approved vendors, including provisions prohibiting modern slavery, human trafficking and child/forced labour.

- Ensuring the Suppliers Code of Conduct noting modern slavery and human trafficking conditions are forming part of any contractual relations with P&O. This further improves compliance with our modern slavery and human trafficking policy.

- DPW Global Code of Ethics, which underlines our commitment towards Human Rights, taking into account the ten principles of the UN Global Impact, updated in 2023.

- Company standards, policies and procedures, setting out employees' obligations and the process to report suspected and known incidents of modern slavery and human trafficking, and consequences for failure to report.

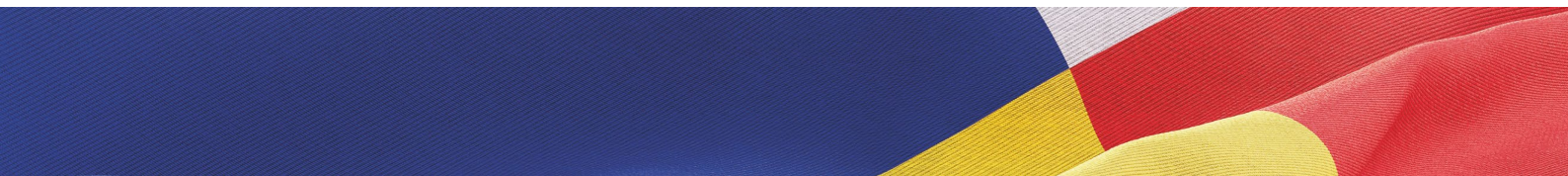
- Policy compliance is monitored internally by DPW Risk & Resilience department.

DP World has established a Human Rights Working Group and developed and implemented a human rights framework and associated policy. The eradication of modern slavery is integral to our human rights approach. In addition, the Company and DP World recognise and support the UN Guiding Principles on Business and Human Rights.

Our Due Diligence

The Company does not tolerate slavery, forced labour or human trafficking anywhere in our operations or supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships, in addition to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers. To achieve this, the Company ensures transparency within the organisation and with suppliers of goods and services to the organisation.

Our due diligence follows a risk-based approach to selecting, onboarding and monitoring third parties within the standard established by our Supplier Code of Conduct and other relevant third-party due diligence procedures, including considerations related to modern slavery or human trafficking non-compliance.



We seek to partner with suppliers whose ethical principles align with ours and expect them to operate under fair and ethical work practices. Our Suppliers' management process includes establishing a Supplier Self-Assessment on Modern Slavery and Human Trafficking, maintaining a Supplier Code of Conduct, and factoring any significant non-compliance for prospective Suppliers' modern slavery or human trafficking risk into our procurement decisions. This Supplier Self-Assessment enables us to review, analyse and implement risk mitigation strategies for any significant non-compliance of Modern Slavery and Human Trafficking in our supply chains.

Risk Assessment and management

The risk of modern slavery and human trafficking varies in different sectors and locations within the business. The company has identified procurement, third-party contractors, in addition to the use of

ports and our vessels as the highest-risk areas that modern slavery and human trafficking could be exposed too due to international travel.

To mitigate these risks, we have increased our oversight and requirements for suppliers and third-party contractors concerning modern slavery and human trafficking. In addition P&O enforce a company culture that increases colleague awareness to enhance engagement and empowerment in taking corrective action towards modern slavery and human trafficking in all locations.

Our team work closely with national and local enforcement agencies to prevent human traffickers from using P&O Ferries ports and services, this enhances our collective resilience. We continuously aim to improve our security management systems, implement robust risk management programmes, conduct internal audits, and provide awareness training on modern slavery and human trafficking indicators.

Key performance indicators to measure effectiveness of steps being taken

Key performance indicators (KPIs) are crucial for P&O to measure how effective the due diligence steps and future improvements are in ensuring that there is no modern slavery or human trafficking anywhere in our business and supply chains.

P&O measured the effectiveness of the port based human trafficking programme by setting a baseline from 2018 and recording the number of incidents every year. From the baseline of two people being stopped and one incident which was suspected of having some human trafficking involvement, has evolved into 150+ people being flagged to police on suspicion of being trafficked due to ongoing due diligence growth within the Company.

Our security statistics of which measure KPIs show increased incidents and arrests developing each year in hand with exposure to staff training and developing company culture. Overtime, the Company will continue to develop key performance indicators across the business to ensure that our modern slavery and human trafficking policy and procedures are implemented to maximum effect.

Training

We continuously work on building and maintaining awareness and understanding amongst our employees, workers and contractors of the UK Modern Slavery Act 2015 and other modern slavery regulations around the world.

P&O take an approach of zero tolerance to inaction on modern slavery and human trafficking. The Company believe that the prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control, therefore continuously develop of awareness and training of all staff across locations to enable identification of potential issues is crucial.

In 2019 the Company partnered with the NGO Invisible Traffick to roll out human trafficking awareness sessions to front line personnel at ports. Within three months of the training's sessions, there were eight observations raised and passed to enforcement, leading to eight arrests of which 2 cases interrupted an international chain of serious and organized crime gangs.

This showed the importance of consistent training, of which P&O staff are required to undergo annual modern slavery and human trafficking training to ensure continuous development and exposure of knowledge to identify signs and the reporting procedure.

This statement is made according to Section 54(1) of the UK Modern Slavery Act 2015. It constitutes P&O Ferries' modern slavery and human trafficking statement for the financial year ending 2024 and have been approved by P&O Ferries Holdings Ltd Board of Directors.

Amelia Mitchell
Director of Corporate Services & ESG
26 April 2024

