



# Modern Slavery

Transparency Statement | 2025

# Modern Slavery Act 2015

## Statement for the year ending 31 December 2025

P&O Ferries aims to ensure secure and resilient societies and communities wherever we operate.

This is as important commercially as it is to the societies where we live and work.

As a European and UK employer, P&O Ferries strives to improve people's lives, strengthen communities and protect the environment. We do not tolerate slavery, servitude, forced labour or human trafficking anywhere in our operations or supply chain.

This statement, pursuant to Section 54(1) of the Modern Slavery Act 2015, sets out the steps we have taken to prevent modern slavery and human trafficking in our business and supply chain in the year ending 31 December 2025 as well as our plans for the current year. It covers the P&O Ferries group of companies\* (P&O Ferries) only.

\*P&O Ferries Division Holdings Limited group of companies (excluding the P&O Ferrymasters group of companies)

# Structure

Our organisation's structure, business and supply chain

## Our business

P&O Ferries is part of DP World. DP World exists to make the world's trade flow better, changing what's possible for our customers and the communities we serve globally.

With 187 years of rich heritage and experience, P&O Ferries is vital to UK infrastructure; connecting Great Britain with Northern Ireland and mainland Europe.

P&O Ferries is a reliable, cost-effective part of customers' supply chains between the UK and Europe.



**1,150+**  
Employees



**9** Locations



**6** Countries

/Structure

# Our Operations

Dedicated to providing an unparalleled service and experience.

Seamlessly moving travellers and cargo across the sea.

That's what it takes to fly the flag.



# Our Purpose

P&O Ferries adheres to the DP World Groups' purpose, to make trade flow and change what's possible for everyone.

We aim to achieve this with fast, sustainable movement of products through a single platform for trade. This is our north star. It guides every decision we make and allows us to make a meaningful difference to the world. Whatever we do, wherever we do it, it all leads here.

Good governance is core to our business achieving its objectives and vision as a Group, to lead the future of world trade.

## Our World Our Future

Addressing our 7 responsible business priorities



Safety



Security



Wellbeing



Ethics



Community Engagement



Climate Change



People Development

## Leaving a lasting legacy through our 3 focus areas

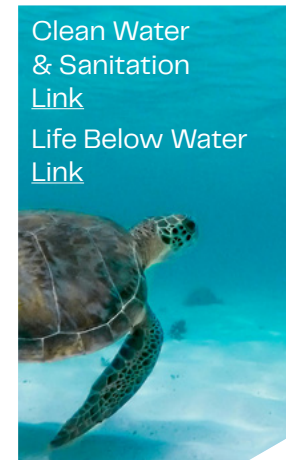
United Nations Sustainable Development Goals



Gender Equality Link



Quality Education Link



Clean Water & Sanitation Link  
Life Below Water Link

## /Structure

Our parent company is P&O Ferries Division Holdings.\*  
P&O Ferries: Connecting the UK and Europe for nearly two centuries for both tourist elements and freight.

### Passengers

- Over 187 years of experience connecting the UK and Europe, providing vital and long-term jobs at our ports across the UK and Europe.
- Upgraded passenger experience with enhanced accessibility, more food and lounge options on board, duty-free shopping and pet lounges.
- P&O Ferries carries more passengers and more freight than any other ferry operator on the Dover to Calais route.

### Freight

- A reliable, cost-effective part of customers' supply chains between the UK and Europe. Our focus is on punctuality and ensuring the fastest possible transit times.
- Operating integrated road and rail links to countries across the continent, including Italy, Poland, Germany, Spain and Romania with our partner Multimodal Solutions (formerly known as P&O Ferrymasters).
- 'Turn-up and go' Space Charter with Irish Ferries on the Dover-Calais route to reduce freight wait times by up to 25%.

**\*Principal employer P&O Ferries Limited:**

P&O Ferries Limited (English employees) | P&O European Ferries (Irish Sea) Limited  
Larne Harbour Limited (both Cairnryan and Larne employees) | P&O North Sea Ferries Limited (Hull employees)  
P&O Short Sea Ferries Limited (Calais Employees) | P&O North Sea Ferries BV (Europoort and Zeebrugge employees)



P&O Ferries handles over **£86bn\*\*** of trade in goods across its UK ports per year

\*\*According to ONS data



Vital to UK infrastructure, connecting Great Britain with Northern Ireland and mainland Europe



**9** ports and **300+** departures every week across **14** vessels



**4,400,000**  
passengers



**915,000**  
tourist  
vehicles



**1,230,000**  
freight units

/Structure

# Our Footprint

P&O Ferries are based in 6 countries:  
England, Scotland, Northern Ireland,  
France, Belgium and the Netherlands.

We operate across  
7 routes and 9 ports:

Dover–Calais

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Hull–Europoort

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Teesport–Zeebrugge\*

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Hull–Zeebrugge

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Larne–Cairnryan

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Tilbury–Zeebrugge

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Tilbury–Europoort

Our two new technologically advanced and sustainable hybrid vessels helped to reduce our carbon emissions by 40% on every trip across the Channel.

Our Pride of Hull vessel is the first ferry on the Hull–Rotterdam route to run on lower-carbon biofuel. The vessel began operating on Biofuel B30 May 2025, which cuts lifecycle greenhouse gas emissions generated by approximately 20% compared with traditional marine fuel.

\*Teesport operation ceased within Q3 2025



/Structure

# Our Stakeholders



Our customers  
approximately

**5.5million+**

in total of tourism and freight customers

Our staff  
P&O Ferries

**1,150+**

employees worldwide

Our suppliers  
approximately

**2,700**

suppliers

# Governance

Our policies and procedures relevant to slavery and human trafficking

## Our Approach

Our commitment to actively combatting and minimising the risk of modern slavery or human trafficking anywhere in our business and supply chains globally is delineated in our suite of group business policies.

### Our Policies

P&O Ferries' active combatting of modern slavery and human trafficking in our business and supply chains is underpinned by appropriate policies which address issues relevant to slavery and human trafficking and are regularly reviewed and updated to reflect our evolving business.



### Key policies and procedures concerning modern slavery and human trafficking include:\*

#### Group Human Rights Statement

Establishes the framework for the actions that DP World will implement through its commitment to human rights in accordance with the UN Guiding Principles to identify and address human rights issues, including those related to modern slavery. We understand human rights to be, at a minimum, those outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

#### Group Modern Slavery and Human Trafficking Statement

Establishes the framework for the actions that DP World will implement through its commitment to modern slavery and human trafficking.

#### Group Sustainability Partnership Policy

With the launch of the DP World Foundation, 2024 saw a transition around the definition, governance and process of charitable donations and community investment. This policy seeks to outline this new transition of roles and responsibilities and outline specifically the governance and process for Group Sustainability Partnerships going forwards.

#### Group Sustainability Policy

Sets out DP World's approach to sustainability and its key priorities and focus areas. The policy is aligned with our stakeholder expectations and seeks to strengthen and support our various sustainability initiatives and programmes aligned with our commitment to being a responsible corporate citizen.

#### Group Health, Safety and Environment Policy

Sets out the goals and outlines the commitments of the Group with respect to HSE performance and continual improvement. It is based on caring for our people, environment, communities in which we work and stakeholder partners.

#### Group Whistleblowing Policy

Sets out a system in which employees and third parties, including employees from suppliers and vendors, 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.

#### Group Procurement Policies and Procedures

Guides our global business units to manage local supply chains effectively.

#### Our Global Code of Ethics

Underlines our commitment towards human rights, taking into account the ten principles of the UN Global Impact.

#### Our Vendor Code of Conduct

Sets out the standards and behaviours to promote ethical business and professional conduct and compliance with applicable laws and regulations, taking into account different areas including, respect for human rights and fair labour practices.

#### Just Transition Statement

Applies to DP World's operations globally and seeks to ensure that the substantial benefits of a green economic transition are shared inclusively and equally.

#### Company Standards, Policies and Procedures

Sets out employees' obligations and the process to report suspected and known incidents of modern slavery and human trafficking, and consequences for failure to report.

#### Gender Equality Statement

Sets out our goals to actively pursue more gender equality in our business.

#### Procedures for Community Investment

Our focus is on strategic community investment at DP World and the requirements and procedures for running community investment projects.

\*P&O Ferries adhere to both local and DP World Group Policies and procedures

## /Governance

P&O Ferries supplements the previous page with the following relevant internal policies, codes and statements that are subject to continuous review and improvement:

[Equality and Diversity Policy](#)

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[Modern Slavery and Human Trafficking Policy](#)

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[Procurement Policy](#)

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[Code of Ethics](#)

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[Our Corporate Policies and Commitments](#) [Link](#)

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[P&O Ferries Vendor Code of Conduct](#)

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[Modern Slavery and Human Trafficking Statement](#) [Link](#)

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[Corporate Social Responsibility at P&O Ferries](#) [Link](#)

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[Quality Standards Accessible Travel](#) [Link](#)

P&O Ferries ensures its policies are readily available to all workers and internal parties via the Intranet and we regularly review and update our policies accordingly.

At P&O Ferries, we adhere to a RICS (Risk and Internal Controls Standards) mechanism to monitor the compliance with any policies and standards.

Any findings of partial-compliance or non-compliance within an audit or gap analysis require an action plan with the due date being overseen by the control owner.

In terms of oversight, all modern slavery policies are escalated through our General Counsel to the Board of Directors for approval and awareness.

# Due Diligence

Our processes in relation to slavery and human trafficking in our business and supply chains

## Human Rights Due Diligence Procedure

P&O Ferries, while concurrently reinforcing expectations through codes of conduct, are currently reviewing all due diligence processes to strengthen their ability to effectively identify, assess, manage, and monitor the risks of modern slavery and human trafficking across key stages, including:

Risk identification and scoping (initial screening)

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Impact assessment and prioritisation (materiality analysis)

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Integration and action planning  
(risk management integration)

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Tracking and monitoring (performance measurement)

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Communication and disclosure (stakeholder transparency)

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Grievance mechanisms and remediation  
(accountability and remedy)

### Screening and Assessment

Prospective suppliers are required to adhere to the Vendor Code of Conduct designed to set the guidelines of how P&O Ferries expects its suppliers to behave when doing business. It covers elements such as (but not limited to) treating workers fairly, following laws, keeping workplaces safe, protecting the environment, and acting honestly. This helps ensure that our suppliers share the same values and standards as P&O Ferries and DP World.

### Contracts

Our Standard Terms and Conditions require suppliers to comply with all applicable laws. To illustrate the importance we place on anti-slavery and human trafficking laws, we intentionally include a specific provision within our Standard Terms and Conditions, requiring supplier compliance.

### Whistleblowing

Any violations can be reported online or by phone through a dedicated 24-7 DP World Global Whistleblowing hotline service, which is operated for DP World by Navex. P&O Ferries promotes DP World's various speak up channels which allow for concerns to be raised anonymously, where permitted by law. [Link](#)

## /Due Diligence

In addition, P&O Ferries actively collaborate with key trade unions:

**France** CGT Confédération Générale du Travail and CFDT: Confédération Française Démocratique du Travail. A dedicated works council convenes monthly to address and respond to all labour-related matters, ensuring ongoing dialogue and responsiveness to employee concerns.

**UK** have regular consultation with two UK Unions: GMB for Dover Port, Maybrook House and Kent House where they have one workplace representative; and UNITE for Hull, Larne, Larne Harbour and Cairnryan where they have approximately six workplace representatives.

**Netherlands and Belgium** Europort & Zeebrugge work with a Dutch Work Counsel who has the right of advisory and consent – with nine representatives from their quay, office and seafarers. With the Collective Bargaining Agreement (CBA) negotiations, there are two to four representatives from every CBA.

Furthermore, a separate Health & Safety Works Council meets quarterly to review and manage workplace safety issues.

P&O Ferries is also required to hold mandatory meetings with trade union representatives concerning payroll matters, which typically take place during the first quarter of each year.

P&O Ferries ensures to schedule a Work Council as soon as the majority of staff representatives request it. The matters could include important and emergency topics.



# Risk Assessment

Areas of our business and supply chains where there is a risk to slavery and human trafficking taking place, and the steps we've taken to assess and manage that risk

## Human Rights Risks in Transportation and Logistics

Transportation and logistics (T&L) are essential to the modern economy, with nearly all businesses relying on outsourced services for product delivery. This dependence has raised challenges in ensuring workers' human rights across the supply chain.

Our approach to risk in our supply chain continues to evolve. In the coming years, we expect to increase reporting on risk as part of our ongoing commitment to identify and mitigate slavery and human trafficking within our business operations and supply chain.

This primer\* highlights the 10 most relevant, urgent, and potential human rights impacts anticipated in relation to T&L operations:

\*Produced by BSR in May 2024

- 1 Occupational Health & Safety
- 2 Fair Working Conditions
- 3 Forced Labour, Human Trafficking & Modern Slavery
- 4 Freedom of Association & Collective Bargaining
- 5 Workplace Discrimination
- 6 Land Acquisition & Indigenous Rights
- 7 Grievance Mechanisms & Access to Remedy
- 8 Emissions & Environmental Pollution
- 9 Just Transition
- 10 Bribery & Corruption

# Identified Risks – *Undocumented Migrants*

The carriage of undocumented migrants into the UK is an identified risk that P&O Ferries monitors.

In 2025, a total of 1 individual was located either on ships and/or in ports in the UK and Ireland.

Outside the UK, 50 individuals were detained in Belgium at the terminal or in a freight unit by security or police. A further 33 individuals were reported to police or deterred in 2025.

These numbers show a significant reduction year on year (from 185 individuals in 2024), and this is due to an increase in the effectiveness of security in Zeebrugge.

This does not reflect the number of individuals apprehended before they reach the ships or those who remain undetected. In addition to those found on board, our ships are passing migrant boats daily.

The majority are transitioning inbound to the UK with a small number transitioning into Europe. Zeebrugge in Belgium is a well-known area where there are frequent attempts by large numbers of individuals to gain access to the port.



## Identified Salient Risk & Priority Areas for Action

Recruitment practices

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Casual labour on vessels

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Fuel supply chains

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Shipbreaking and end-of-life vessel disposal

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Human trafficking within EU Port

## External Expertise & Collaboration

P&O Ferries has worked to establish collaboration with both UK Border Force and the Port of Antwerp Bruges central control room. These partnerships have been instrumental in the reduction of transmigrant activity and thereby helping to mitigate the risk of human trafficking, modern slavery, and associated human rights violations.

# Effectiveness

In ensuring that slavery and human trafficking is not taking place in our business or supply chains, measures against such performance indicators as we consider appropriate.

## Our Progress over the last year

Conducted the Group Risk and Internal Controls Standards (RICS) assessment to assess control implementation and effectiveness.

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Actively collaborated and engaged with external organisations, stakeholders, international business associations and bodies to address and advance efforts against modern slavery.

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In 2025, no whistleblower reports were received concerning modern slavery or human trafficking.

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We have invested in thermal cameras on our vessels to try and avoid any collision with small unlit crafts.

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Updated and revised our Modern Slavery and Human Trafficking Policy to include updates on identification of risks of modern slavery in practice, contractual obligations and due diligence requirements and training.

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Modern Slavery and Human Trafficking training has been readily available to staff via an on-line learning platform. This ensures our stakeholders are equipped with knowledge to identify risks, red flags and report any possibilities.



# Training

Information about modern slavery training provided to our staff and suppliers

## Raising Awareness

### Employees

DP World Group's modern slavery training module is presented via an e-learning platform to our UK employees.

Throughout 2025, our employees had access to e-Learning training at all times. P&O Ferries achieved a Modern Slavery training total completion rate of 82%.

Additionally, the P&O Ferries Sustainability Strategy which includes social aspects, focusing on how a business impacts wider society and workplace culture. Equality, fairness and responding to our local communities are at the heart of this theme.

Finally, P&O benefited from the deployment of DP World Human Rights Training in November 2025 via e-learning.

E-Learning employee modern slavery training completion rate

# 82%



## /Training

### Suppliers

P&O Ferries encourages its suppliers to develop awareness for both managers and workers to effectively implement its policies, procedures, and improvement goals, as well as to comply with relevant legal and regulatory requirements. This includes providing awareness on modern slavery. We provide access to our whistleblowing hotline, freely available, anonymously, to all third parties.

### Training Plans

Additional work will include modern slavery within a sustainable, ethical business context and in 2026, P&O Ferries will maintain its internal awareness campaign on modern slavery.

The current format in which training is provided is via an e-learning module. This e-learning module includes the use of text, audio, visuals and an end of module exam to ensure understanding.

Furthermore, to highlight the the modern slavery risks anticipated, P&O Ferries continuous training highlights red flags for staff to attain awareness, and also informs staff on what action to take if any suspicion of modern slavery and human trafficking arises.

2026 will see a launch of in-person training presentations regarding modern slavery and human trafficking in all UK and EU ports.



# Future Plans

What we aim to develop over the next year

## Where we are going

We continue to develop and evaluate robust systems and processes that include and address our own business operations in the UK and Europe, and our global supplier base in a number of countries across the globe.

We are wholly supportive of transparency regarding the reporting of instances of modern slavery.

Over the next reporting year and beyond, the plan is to focus on the following areas:

Establish an effective relationship with a new Union organisation, France FO (Force Ouvrière) for our french colleagues.

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Collaborate with Group and DP World Europe to build a regional human rights and modern slavery information-sharing network.



## /Future Plans

### Our Organisation's Structure, Business, and Supply Chain

Improve transparency surrounding Tier 1 suppliers and supply chain data through comprehensive analysis and mapping.

### Policies Relevant to Slavery and Human Trafficking

Map and evaluate existing governance frameworks to identify coverage gaps concerning risks associated with modern slavery.

Strengthen sustainable procurement procedures, incorporating modern slavery into a data ecosystem, systems and processes.

### Due Diligence

Review, enhance and create a plan to strengthen the due diligence processes for P&O Ferries, incorporating data, systems, and procedures.

### Risk Assessment

Build upon the salient risk assessment.

Continue to Collaborate with expert stakeholders to better understand the local context and associated modern slavery risks.

### Effectiveness

Continue to build upon the reporting framework to ensure compliance with human rights and modern slavery objectives.

Control Effectiveness: Continue to report into the Group Risk and Internal Controls Standards (RICS) assessment in scope of Human Rights and Modern Slavery Controls.

### Training

Continue developing training programmes for the future.

Raise awareness and enhance expertise on Modern Slavery.

Ensure all employees complete mandatory modern slavery awareness training, focusing on recognising signs, reporting procedures, and policies and stance on this issue.

Continue collaboration and engaging with external organisations, stakeholders, and other international business associations to address modern slavery, share peer learning, and openly discuss challenges and solutions.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes P&O Ferries' modern slavery and human trafficking statement for the financial year ended 31 December 2025. It has been approved by P&O Ferries Division Holdings Limited's Board of Directors.

A handwritten signature in black ink, appearing to read 'Kasper Moos', with a small dot at the end.

**Kasper Moos**  
CEO P&O Ferries  
30 April 2026