



CSR-03

Social Responsibility Policy

Revision: ~~04/10/2024~~16/01/2025

1 PREAMBLE

P&O Ferrymasters also referred as “The Company” – means P&O Ferrymasters Limited and/or Unifeeder Shortsea – a business unit of Unifeeder A/S in the form of an agreement based joint venture between P&O Ferrymasters Limited and Unifeeder A/S and/or any other company or entity within the P&O Ferrymasters Holdings Limited Group, including any direct or indirect affiliate, subsidiary, joint venture and any agreement based joint ventures of any such company or entity.

This document applies to P&O Ferrymasters. The document should be consistently applied across the company unless it contradicts with country specific legislation.

2 DEFINITIONS

Corporate Social Responsibility (CSR) is a self-regulating business model that helps a company be socially accountable to itself, its stakeholders, and the public. By practicing corporate social responsibility, also called corporate citizenship, a company is conscious of the kind of impact they are having on all aspects of society, including economic, social, and environmental.

Engaging in CSR means that, in the ordinary course of business, a company is operating in ways that enhance society and the environment instead of contributing negatively to them.

3 PURPOSE

To declare our commitment to conduct business socially responsible way, define standards of what we would strive for and enlist the ways in order to enact this policy

4 SCOPE

This policy is applicable to all production units, divisions, departments, locations, and employees of P&O Ferrymasters.

5 POLICY

5.1 Policy statement

SOCIAL RESPONSIBILITY POLICY

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 multimodal 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 13 European countries (Belgium, Denmark, Eire, France, Germany, Hungary, Italy, Poland, Spain, The Netherlands, Turkey, United Kingdom, and Ukraine). P&O Ferrymasters works with road haulage, rail, air, and sea subcontractors across Europe to deliver its services.

The Chief Executive Officer 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 subcontractors.
- Ensuring and checking that the age of employees is above the legal age to work.
- Ensuring that original identity documents of employees are not retained.
- Creating and maintaining a working environment in which the capabilities of all employees are developed and to provide competitive terms and conditions.
- Ensuring that working hours are not excessive and that employees and employees of subcontractors are paid fair wages.
- Recognising and respecting the human rights, dignity and needs of all employees.
- Conducting its business with honesty and integrity and applying ethical standards.
- Seeking to contribute to wellbeing and development of the communities in which it operates.
- Protecting and enhancing the health, safety, and welfare of its staff.
- Seeking to avoid or minimise any adverse impacts on the environment.
- Building and maintaining open and effective two-way communications on environment and community involvement.



Timm Ulrich Niebergall
Chief Executive Officer

6 ENACTMENT

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

- Business risks concerning social responsibility are identified and evaluated via Corporate Risk Register and reviewed in line with the Corporate Risk Assessment Procedure.
- ~~Sube~~Contractors 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~~ Procurement and Setting up, approving and maintenance of a supplier Procedures.
- ~~Sube~~Contractors work to P&O Ferrymasters ~~Terms and~~ Conditions of ~~Sube~~Contracting, including compliance with applicable laws and regulations.
- Incidents of noncompliance are recorded, reported, and investigated in line with the Incident Management and Reporting Procedure.
- ~~Sube~~Contractors may have withdrawn “approved” status for noncompliance in line with the ~~Setting up, approving and maintenance of a supplier~~ Logistics Service Provider Approval Procedure.
- P&O Ferrymasters employees can raise concerns about Social Responsibility risks in line with the Whistleblowing Policy.
- Employment and checks on new employees are completed in line with P&O Ferrymasters Recruitment and Selection Policy, including checks on age and identity. Original identity documents are not retained by the Company.
- Monitoring of working hours through both local management and centrally via Human Resources, under Companies Remuneration and Reward Policy and to ensure that working time directives are met and are not excessive.
- Any incident involving 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 decision are considered.
- Procedures are reviewed periodically as defined in Document Control Procedure, and/or if substantial change in legislation or in the company operations occurs.
- Any activity identified which involves child labour, slavery, or human trafficking, within P&O Ferrymasters or its subcontractors, will be reported to Executive Manager responsible for that activity and to the relevant authorities.
- Issues Code of Conduct to all Business Partners

DOCUMENT INFORMATION CARD

ROLE	NAME	FUNCTION	
Writer/Editor	Jaroslav Rotter	Group Quality and Audit Manager	
Owner/Approver	Paul FitzPatrick	General Manager Risk and Compliance	
First Issue	30/04/2022	Last Review	<u>16/01/2025</u>
Review Interval	12 months	Next Review	<u>16/01/2026</u>

DOCUMENT HISTORY

When	What	Who
22/09/2023	Transfer to the new PASS2.0 template. Minor changes to formatting and layout. Addition of definition, scope, and purpose. Update on job roles/functions to reflect current structure.	Jaroslav Rotter
04/10/2024 <u>04/10/2024</u>	Transfer to the new branding template. Annual review. No changes made. <u>Transfer to the new branding template. Annual review. No changes made.</u>	Jaroslav Rotter <u>Jaroslav Rotter</u>
<u>01/11/2024</u>	<u>Update to terminology and some document references</u>	<u>Paul FitzPatrick</u>
<u>16/01/2025</u>	<u>Approval and signature by CEO.</u>	<u>Timm Niebergall</u>