

WHISTLEBLOWING POLICY

1. About this Policy

1.1 Peel Ports Group (the “Group”) is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with the Code of Conduct. However, all organisations face the risk of unknowingly harbouring illegal or unethical conduct and a culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

1.2 The purpose of this policy is:

- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- (b) To provide staff with guidance as to how to raise their concerns.
- (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy does not form part of any contract of employment or other contract to provide services and it may be amended at any time.

2. Who does this policy apply to?

2.1 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

3. Who is responsible for this policy?

3.1 The Board of Directors has overall responsibility for the effective operation of this policy.

3.2 The Group Company Secretary (contact details at the end of this policy) has day-to-day operational responsibility for this policy and you can refer any questions about it to them.

4. What is Whistleblowing?

4.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- (a) criminal activity;
- (b) failure to comply with any legal obligation;
- (c) health and safety risks;

- (d) damage to the environment;
- (e) bribery;
- (f) facilitating tax evasion;
- (g) financial fraud or mismanagement;
- (h) breach of our internal policies and procedures (including our Code of Conduct);
- (i) circumstances that give rise to an enhanced risk of slavery or human trafficking;
- (j) conduct likely to damage our reputation or financial wellbeing;
- (k) unauthorised disclosure of confidential information;
- (l) negligence;
- (m) the deliberate concealment of any of the above matters.

4.2 A whistleblower is a person who raises a genuine concern relating to any of the above.

4.3 If you have any genuine concerns about suspected wrongdoing or danger relating to any of the Group's activities you should report it under this policy.

4.4 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Group's Grievance Procedure. It also excludes actual or suspected data protection breaches which should be addressed in accordance with the Group's Data Protection Policy. Criminal activities may also be reported to the police.

5. Raising a Whistleblowing Concern

5.1 We hope that in most cases you will be able to raise any concerns with your line manager. Your line manager will arrange a meeting with you as soon as possible to discuss your concern and you may bring a colleague or union representative to this meeting.

5.2 Your line manager will investigate the matter and tell you the outcome of this investigation and what the Group has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

5.3 As part of their investigation your line manager will consult with the Group Company Secretary (who will make a confidential record of the concern) as well as the Group HR Director.

5.4 If you would prefer not to raise your concern in this way, or you consider that your concern has not been adequately addressed, then you should contact the Whistleblowing Hotline (contact details at the end of this policy). The Whistleblowing Hotline will listen to your concern and raise it with the Group Company Secretary and Group HR Director. In the event that your concern involves the Group Company Secretary or Group HR Director

your concern will be raised with the Group's CEO and CFO. There may be circumstances when it may be appropriate for your concern to be raised with members of the Board.

- 5.5 The Whistleblowing Hotline will also give you advice about whistleblowing and can act as an intermediary.
- 5.6 Concerns can be raised anonymously, however maintaining anonymity can make it more difficult or impossible to properly investigate a matter.

6. Whistleblower Protection

- 6.1 Any concerns raised under this policy will be investigated confidentially and your identity will not be revealed to the person(s) you are whistleblowing about.
- 6.2 Your matter may be raised with the Governance and Ethics Committee, however your identity will not be revealed unless there is a legitimate reason for doing so.
- 6.3 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.4 A member of staff who raises a genuine concern has the right not to be dismissed or subject to other detriment.
- 6.5 Anybody who victimises a whistleblower will be committing a disciplinary offence and will be dealt with in accordance with the Group's Disciplinary Procedure.

7. Offender Punishment

- 7.1 If a wrongdoing is discovered following an investigation under this policy, the Group's Disciplinary Procedure will be followed.
- 7.2 It should be noted that making a malicious false allegation will be considered a disciplinary offence.

8. Contacts

<p>Group Company Secretary</p>	<p>Farook Khan (General Counsel) Phone: 0151 949 6029 Email: Farook.khan@peelports.com</p>
<p>Whistleblowing Hotline</p>	<p><u>UK</u></p> <p>Phone: 0800 915 1571 Email: peelports@safecall.co.uk Report online: www.safecall.co.uk/reports</p> <p><u>ROI</u></p> <p>Phone: 1800 812 740 Email: peelports@safecall.co.uk Report online: www.safecall.co.uk/reports</p> <p><u>Netherlands</u></p> <p>Phone: 00800 7233 2255 Email: peelports@safecall.co.uk Report online: www.safecall.co.uk/reports</p>