Supplier Code of Conduct

Version 3.0 Date of last Revision: 14th September 2026 Date of last Review: September 2026

Forward

At PD Ports, the way we conduct our business is just as important as the results we achieve. Our values guide our decisions, shape our culture and define how we work with colleagues, customers, suppliers and the communities we serve. These values remain at the heart of everything we do:

Safety, Teamwork, Respect, Excellence, Trust, Commitment and Honesty.

Safety is our number one priority. We are committed to ensuring that everyone who works with and for PD Ports returns home safely every day. This commitment extends beyond our own workforce and into every part of our supply chain.

Our suppliers play a vital role in supporting the success of PD Ports. The products, services and expertise you provide help us deliver safe, efficient and reliable operations for our customers. As such, we view our suppliers as valued partners in achieving our strategic ambitions and maintaining the high standards for which PD Ports is known.

We expect all those who work with us to conduct business responsibly, ethically and professionally. This Supplier Code of Conduct sets out the standards and behaviours that we expect across our supply chain, reflecting our commitment to integrity, accountability, sustainability and continuous improvement.

By working together and upholding these principles, we can build strong and trusted partnerships, create long-term value for our customers and stakeholders, and contribute positively to the future success of our organisations and the communities in which we operate.

Thank you for your commitment to these standards and for the important role you play in supporting PD Ports.

PAUL FOREMAN

Chief Executive Officer

Paul Foreman

1. Introduction

Organisations that supply goods and/or, services or works to PD Ports ('Suppliers') play an important role in the delivery of our service to our customers and the commitments we make to them. As such, in undertaking the procurement of all goods and services to meet our corporate objectives, several goals are paramount.

- That we maintain excellence in the quality of our supply chain, by maintaining strong, open, and transparent partnerships with our Suppliers.
- That all goods and services we procure represent the best value and meet the needs of PD Ports.
- That we commit, and ensure our Suppliers commit, to meeting the requirements and standards of company policies, and the requirements of the applicable statute, regulation, and law.
- That we act, and ensure our Suppliers commit to act, in a manner that represents an organisation with strong environmental and social ethics with a strong moral compass.

In delivering these commitments we must ensure adherence to the highest standards of ethical and professional behaviour.

The overall objective of the Supplier Code of Conduct is to build trusting and open relationships between PD Ports and our Suppliers. This Supplier Code of Conduct acts in a reciprocal way in respect of our Suppliers and sets out the behaviours we would expect of each other.

We recognise that in many cases a Supplier can only be as good as its customer, so in return, Suppliers can expect us to place risk with the party best able to manage it, create the right conditions for innovation and create a culture of collaboration between PD Ports and our suppliers.

We expect our employees to treat Suppliers with fairness and respect and to work jointly with Suppliers to build trusting collaborative and constructive working relationships. In return we expect Suppliers to treat our employees in the same way, and to work with us to build those trusting, collaborative and constructive relationships that are focused on delivering for the public.

This Supplier Code of Conduct is intended for all those involved in the supply chain. As a statement of good practice, it should be read both by current and aspiring Suppliers to PD Ports and by their subcontractors in the supply chain. We expect our Suppliers to communicate this Supplier Code of Conduct to employees, their parent company, subsidiaries, and subcontractors involved in supplying goods and/or services or works to PD Ports; our commitment is that we will communicate it to our employees.

2. Compliance

The Supplier Code of Conduct is intended to set out how we and our Suppliers will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights or to undermine our contracts with Suppliers or the rules we set out when we procure our goods and services or the rights, powers, or obligations to a regulatory agency, which shall always take precedence.

All Suppliers who provide goods and services to PD Ports are expected to comply with all aspects of this Supplier Code of Conduct. Both parties should be open and transparent with each other and report any instances of non-compliance. In these circumstances, the first step is for the PD Ports Head of Procurement and the Supplier to discuss and, where appropriate, agree on suitable remedial actions.

Related Policies

2.1 PD Ports operates a range of policies that are designed to establish the standards in how we undertake our day-to-day business activities. Including but not limitedto;

- Anti-Slavery and Human Trafficking Statement
- Brookfield (as the parent company of PD Ports) Code of Business Conduct and Ethics
- Expenses Policy and Procedures
- Procurement Policy
- Third-Party Anti-Bribery and Corruption (ABC) Policy

2.2 These policies are primarily for the use of PD Ports colleagues, however, there may be instances where Suppliers are required to comply with the policy in part or whole. This document draws from the Related Policies and sets out the areas in which our Suppliers are required to comply with.

2.3 Contact

For further information and queries, please contact the Head of Procurement via email (pd.procurement@pdports.co.uk).

If you wish to report any breaches in confidence, then please contact PD Ports IT Governance, Risk & Compliance Manager via email (dpo@pdports.co.uk).

3. Individual Rights

3.1 Respect and Integrity

Our employees, those of our Suppliers, and service users have the right to respectful treatment. We will not tolerate discrimination, harassment, or victimisation in the workplace. We expect our Suppliers to provide the same commitment, including their employees. The Equality Act 2010 protects against discrimination, harassment, and victimisation.

3.2 Behaviour

We will work constructively and collaboratively with our Suppliers. We expect Suppliers to be prepared to invest in their relationships with PD Ports and establish trust with our staff and with other Suppliers involved in the delivery of a service. We also expect Suppliers to be able to speak out when employees or other Suppliers are not complying with the requirements of this Policy or the Related Policies.

3.3 Modern Slavery

3.3.1 All Suppliers will commit to complying with (either directly or indirectly via their supply-chain), and can evidence compliance to (on demand), the requirements of the Modern Slavery Act 2015 by ensuring that slavery and human trafficking is not taking place in any part of their supply chains and any part of their business. The act applies to;

- Any organisation that is a 'body corporate' or a partnership, wherever incorporated or formed
- Any organisation which carries on a business, or part of a business, in the UK
- Any organisation which provides goods or services
- Any organisation that has an annual turnover of £36 million or more excluding the relevant taxes, however, we require all Suppliers to comply with the requirements of the Modern Slavery Act 2015 irrespective of turnover

3.3.2 Where applicable, and with particular reference to international supply chains which supply raw materials, tools or components, Suppliers shall commit to complying with, and can evidence compliance to (on demand), the UK conventions pertinent to the eight International Labour Organisation (ILO) conventions (as applicable) and that sufficient controls and measures are in place to monitor compliance to them (https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102651).

Ratifications for the United Kingdom of Great Britain and Northern Ireland are as follows:

- *C029 - Forced Labour Convention, 1930 (No. 29)*
- *C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)*
- *C098 - Right to Organise and Collective Bargaining Convention, 1949 (No.98)*

- *C100 - Equal Remuneration Convention, 1951 (No. 100)*
- *C105 - Abolition of Forced Labour Convention, 1957 (No. 105)*
- *C111 - Discrimination (Employment and Occupation) Convention, 1958 (No.111)*
- *C138 - Minimum Age Convention, 1973 (No. 138)*
- *C182 - Worst Forms of Child Labour Convention, 1999 (No.182)*

3.4 Human Rights

PD Ports is committed to respecting internationally recognised human rights and expects all Suppliers to adopt the same commitment throughout their organisations and supply chains.

Suppliers shall:

- Respect the dignity, freedoms and rights of all individuals.
- Prohibit forced, bonded or involuntary labour.
- Prohibit the use of child labour.
- Comply with all applicable employment laws and regulations.
- Promote freedom of association and collective bargaining where legally permitted.
- Provide fair wages and working conditions.
- Maintain working environments free from harassment, intimidation, discrimination and abuse.

Suppliers shall identify, assess and mitigate human rights risks within their operations and supply chains and provide evidence of compliance upon request.

4. Business Activities

4.1 Risk Management

We aim to ensure that risk is allocated to the party best able to manage it and we will actively engage our stakeholders and the supply market at large to ensure we make informed decisions concerning our risk management. We expect our suppliers to take the same approach and commit to managing risk within their organisation, and, be able to evidence it to us upon our request;

- A clear and unambiguous approach to defining risk and managing risk on an ongoing basis
    - Risk registers and mitigation plans.
    - Business and supply-chain continuity plans which are practicable and deployable in the event of a risk event.
    - Appropriateness and fairness in the assignment of risk management, between the parties within a supply chain.

4.2 Innovation

We expect our Suppliers to use recognised industry practices in the delivery of goods and services to us and bring innovation, ideas, and expertise to help PD Ports maintain competitive advantage, where appropriate. Our commitment to our Suppliers is to create an environment where ideas and innovation are encouraged, both within a procurement process or during the provision of a service.

4.3 Data Integrity

The success of our procurement exercises and future contract management processes is heavily dependent on our mutual ability to share accurate and timely data and be forthcoming with that information as required. Suppliers may be asked to contractually commit to obligations concerning Data Integrity, but in any event, it is the expectation of PD Ports that Suppliers will act in this manner.

4.4 Data Protection

Suppliers shall adhere to relevant data protection and security laws as well as to respective regulations concerning personal data of customers, consumers, employees, and shareholders. Suppliers shall always comply with all said requirements when personal data is collected, processed, transmitted, or used. Suppliers shall safeguard and make only appropriate use of confidential information. Suppliers shall not, under any circumstances (unless required by law) disclose any information that is not known to the public.

4.5 Artificial Intelligence and Emerging Technologies

Suppliers shall implement appropriate governance, oversight and controls relating to the use of Artificial Intelligence (AI), machine learning, automated decision-making systems and other emerging technologies.

Where such technologies are utilised in the performance of services provided to PD Ports, Suppliers shall ensure:

- The technology is used ethically, lawfully and responsibly.
- Appropriate safeguards exist to prevent bias, discrimination or unfair outcomes.
- Personal and confidential information remains adequately protected.
- Human oversight is maintained over material business decisions.
- Appropriate controls exist to ensure data accuracy, transparency and accountability.

Suppliers shall notify PD Ports where AI or automated decision-making significantly contributes to services provided on behalf of PD Ports.

4.6 Reputation and Public Relations

We expect all parties to be mindful of the need to maintain the reputation and trust that is placed in PD Ports by our customers and ensure that neither they nor any of their partners or subcontractors, bring PD Ports into disrepute by engaging in any activity which would be likely to damage the reputation or image of PD Ports to its customers or the public at large.

4.7 Cyber Security

The security of PD Ports IT systems and data must be sufficiently protected. As such any Supplier who falls into any one of the following three categories shall be required to maintain Cyber Essentials certification as a minimum or such equivalent certification that is set by the National Cyber Security Centre in the United Kingdom:

- Any Supplier that is directly or indirectly processing personal or sensitive data (as defined under the Data Protection Act 2018 or General Data Protection Regulation 2016/67 as applicable) in the provision of their service to PD Ports.
- Any Supplier that is providing the core IT services of any fixed line or mobile telephony, or local/wide area networks including data centres, or email, or internet access, or data storage, or backup and resilience services.
- Any Supplier that can directly access PD Ports' IT systems, either directly or indirectly (using cloud-based systems or proxy connections or similar via a 3rd party).

Suppliers shall maintain appropriate cyber security controls proportionate to the nature and risk profile of the products or services supplied to PD Ports.

Such controls should include:

- Multi-factor authentication for privileged and remote access accounts.
- Security awareness training for employees.
- Vulnerability management and patching processes.
- Incident detection and response procedures.

- Appropriate controls over third-party system access.

Suppliers shall notify PD Ports immediately, and in any event within 24 hours, of becoming aware of any actual or suspected cyber security incident that may affect PD Ports systems, data, operations, assets or customers.

Where appropriate, PD Ports may require evidence of Cyber Essentials Plus, ISO 27001 certification or equivalent cyber security assurance measures.

4.8 Environmental

PD Ports is committed to protecting the environment and running environmentally sound operations.

In conducting our day-to-day business operations, we want to make a positive contribution in the transition to an environmentally sustainable economy, and in doing so, demonstrate a responsible approach to managing our impact, and the impact of our Suppliers, on the environment and society.

We will achieve this aim by striking an appropriate balance between our financial and business objectives; the expectations of us by our stakeholders within society; and our environmental aspirations and approach as set out in our Environmental Policy.

As a minimum, we expect our suppliers to observe all relevant environmental legal requirements in the countries in which they operate. Furthermore, we encourage and prefer suppliers who meet the following requirements:

1. Environmental Management Systems: Have implemented environmental management systems (EMS) through a program in accordance with or similar to ISO 14001 and have assigned a person responsible for the environment.
2. Climate Change and Greenhouse Gas Emissions

   Suppliers shall recognize the urgency of addressing climate change and commit to reducing greenhouse gas emissions in their operations.

   Suppliers should set specific targets and goals for energy efficiency, renewable energy use, and emissions reduction, where applicable to their operations.

   Suppliers should regularly monitor and report on their greenhouse gas emissions and progress toward their targets.
3. Single Use Plastics: Suppliers are expected to work towards the reduction and elimination of single use plastics in their operations, products and packaging wherever possible. This includes but is not limited to plastic bags, straws, cutlery, cups and other non-essential single-use plastic items. Suppliers are encouraged to seek sustainable alternative materials, products and/or reusable options.

   Suppliers are expected to maintain transparency in their plastic usage and disposal practices. We may request periodic reports on your efforts to reduce and replace single-use plastics in your operations, products and packaging.
4. Product Design: Have design processes in place to maximise product efficiency (i.e. use of energy, water and other resources), design out of hazardous materials and ensure end-of-life recyclability.

5. Raw Material Sourcing: Have developed guidelines to responsibly source raw materials that address issues such as environmental compliance, pollution prevention and product safety. Suppliers should implement measures to ensure transparency and traceability in their supply chains.
6. Carbon Footprint: Promote efficient use of resources throughout operations including electricity, fuel, raw materials, water and other resources, particularly those that are non-renewable, thereby reducing the overall carbon footprint of products and services.
7. Packaging Specification: Minimize product packaging wherever practicable, including consideration of reusable packaging and specification of packaging with a recycled content and end-of-life recyclability.
8. Prevention of Pollution: When dealing with hazardous substances take all reasonable steps to prevent pollution during handling, transportation, storage and disposal, including developing procedures for dealing with emergencies and spill response.
9. Staff Training: Train, educate and inform employees about environmental issues that may affect their work and promote environmental awareness to all those working on their behalf, including contractors.

4.9 Confidentiality

Suppliers are required to comply with the provisions in our contracts and/or terms and conditions of purchase, which can be made available to you upon request.

4.10 Conflicts of Interest

We expect Suppliers to monitor for and mitigate against, potential or actual conflicts of interest. Should an actual, or potential, conflict of interest arise, then the Supplier should notify the Head of Procurement for guidance and agreement to any mitigations that may be required.

4.11 Business Continuity Planning

4.10.1 Introduction

We need to plan for and respond to a wide range of incidents (both internal and external) that may have an adverse effect on our day-to-day operations, and, on our ability to meet our obligations to our customers. We do this by maintaining a clear and robust business continuity plan that sets out our approach to managing incidents without detriment to our customer or our stakeholders.

We expect Suppliers to adopt a similar approach that proactively plans and mitigates against incidents which may directly or indirectly affect either their own operations or those of PD Ports (and make them available to PD Ports upon demand). Where appropriate, we will share our business continuity plan with suppliers and collaborate with them.

4.10.2 Business Continuity Planning

In creating a business continuity plan, Suppliers shall commit to complying with, and can evidence compliance to (on demand), maintaining a professional business continuity plan and management system that ensures the following.

- Business risks and/or potential for incidents which would disrupt business operations are clearly identified.
- The subject of the plan in terms of what business assets are being protected by the plan are clear and understood I.e., certain company assets; trading income; logistical operations etc.

- The measures, processes, and controls to manage and/or reduce risks prior are defined and appropriately managed.
- Overall, the business continuity plan is recorded, documented, and shared with relevant stakeholders across the business. Plans, actions and mitigants are assigned to named individuals and/or positions and progress is tracked.
- Lastly, business continuity plans are tested frequently and adapted/adjusted appropriately.

5. Behaviour and Ways of Working

5.1 Ethics and Behaviour

Our employees are required to act in accordance with the Brookfield (as the parent company of PD Ports) Code of Business Conduct and Ethics and we expect our Suppliers to conduct themselves to a similar standard.

The guiding principles that Suppliers should follow when concerning business ethics and behaviours are as follows;

5.1.1 Protecting Company Assets – company assets, both physical and intellectual property, should be protected at all times by maintaining confidentiality; reducing wastefulness; promoting efficiency and ensuring assets are used for the benefit/purpose in which they were intended.

5.1.2 Accuracy of Financial Records – financial records are true, up to date, and suitable for (where applicable) public disclosure. Furthermore, a healthy relationship with regulatory, enforcement and other government agencies such as HMRC is maintained.

5.1.3 Duties to Stakeholders – Stakeholders are appropriately engaged, considered and communicated with professionally and the reputation of PD Ports in conducting its day to day business activities are maintained through professional and proper conduct.

5.1.4 Communications and Media – Methods of communication within and external to PD Ports are managed effectively and professionally and under no circumstances should a Supplier speak on behalf of PD Ports or purport to be an agent or representative of PD Ports without permission.

5.1.5 Conflicts of Interest and Personal Behaviour - Conflicts of interest are minimised and managed effectively. At all times, the behaviour and conduct of Supplier personal is befitting that of a professional and conscientious organisation and shall never bring PD Ports or its client into disrepute.

5.1.6 Positive Work Environments – Suppliers shall maintain and contribute to a positive working environment that is free of harassment and discrimination and provides respect, equity, fairness and dignity to those within it.

5.1.7 Mental Health and Well-being - Suppliers should acknowledge the importance of mental health and well-being in the workplace.

Suppliers should provide appropriate support and resources to promote the mental health and well-being of their employees.

5.1.8 Compliance with Laws, Regulations and Policies – Suppliers conduct themselves in a manner that is compliant with laws, regulations, policies, and social ethics.

5.2 Engagement with Local Communities

Suppliers should actively engage with local communities by supporting volunteering initiatives, partnering with local organizations, or contributing to local economic development.

5.3 Anti-Fraud and Anti-Corruption

Suppliers shall comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations, and standards. Suppliers shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence a PD Ports employee or agent to act or to secure an improper advantage to obtain or retain business. This includes, but is not limited to, adherence to:

- Bribery Act 2010
- Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017
- Anti-Money Laundering Act 2018
- The PD Ports 'Anti-Slavery and Human Trafficking Statement'
- The PD Ports 'Third Party Anti-Bribery and Corruption (ABC) Policy'
- The Competition Act 1998

5.4 Transparency

Where appropriate, PD Ports will provide transparency of performance metrics; business requirements; future business plans; and key financial or cost information, to its Suppliers or potential Suppliers, to promote better business outcomes and encourage collaboration. However, this will be within the constraints of confidentiality and commercial interests, notwithstanding any regulatory obligations.

5.5 Ethical Treatment and Anti-Discrimination

PD Ports is committed to eliminating unlawful discrimination based on gender, age, disability, race, religion, sexuality, or social class and in doing so ensuring that there is no unlawful discrimination against any protected group, on grounds such grounds as race, religion and belief, disability, gender reassignment, sexual orientation, age, pregnancy/maternity or marriage and civil partnership. We expect our Suppliers to make this same commitment, following the definitions and scope within the following acts:

- Equalities Act 2010 (which incorporates the Sex Discrimination Act 1975, the Race Relations Act 1976.
- Equal Pay Act 1970.
- Disability Discrimination Act 1995.
- Employment Equality (Sexual Orientation) Regulations 2003.
- Employment Equality (Religion or Belief) Regulations 2003.
- Employment Equality (Age) Regulations 2006.
- Equality Act 2006.
- Human Rights Act 1998).
- or other relevant or equivalent legislation, or any statutory modification or re-enactment thereof.

5.5.1 We expect Suppliers to monitor for, and mitigate against, potential or actual

breaches of this commitment. Should an actual, or potential, breach arise, then the Supplier should notify the 'Reporting Hotline' on 0800 652 6598 .

5.6 Gifts and Hospitality

5.6.1 We understand that the offering of gifts, hospitality and entertaining can be part of a healthy working relationship between organisations. However, they must not present any appearance of dishonesty, coercion, or impropriety. Whilst gifts and hospitality are permitted during our Supplier relationships, our employees are required to act in accordance with our Gifts and Hospitality Policy and we expect our Suppliers to apply the similar standards.

5.6.2 The guiding principles that Suppliers should follow when offering gifts and/or hospitality are as follows;

There should be no intention or attempt to influence an employee, agent or supplier to PD Ports to obtain or retain business or gain a business advantage (or reward or incentivise the same).

It should be compliant with all laws, both national and international.

It should never be in the form of cash, vouchers, payment cards, or any other method of payment that gives the bearer the ability to exchange it for goods and/or services.

Be of appropriate value and given or offered at an appropriate time.

Not to give, promise to give, or offer a payment or accept a gift or hospitality during a procurement process in which the Supplier, or partners/affiliates of the Supplier, are involved in.

5.6.3 Should a Supplier become aware of a potential or actual breach of either the Gifts and Hospitality Policy and the guiding principles set out above, then the Supplier shall;

- Notify the Head of Procurement (shaw.dewar@pdports.co.uk) AND PD Ports Group Human Resources (hr.admin@pdports.co.uk immediately via email
- Not discuss the matter with any other person without the express permission of the above individuals.

5.7 Fair Competition and Anti-Trust

PD Ports is committed to compliance with national and international laws that govern and promote fair competition. We expect our Suppliers to compete fairly and commit to the principle that they shall not be a party to any activity or arrangement that restricts competition, colludes, creates a monopoly or cartel, fixes prices, artificially restricts supply, abuses a dominant market position or any other similar practice.

Suppliers shall therefore comply with all national (within the locale of the end-user or recipient of their service) and international laws concerning competition and anti-trust, including but not limited to;

- The Competition Act 1998

- Articles 101 (anti-competitive) and 102 (anti-trust) of the Treaty on the Functioning of the European Union (TFEU)

5.8 Sanctions and Trade Regulation

PD Ports is committed to compliance with unilateral or bilateral sanctions that are imposed on individuals, corporate entities, countries, or states by the Government of the United Kingdom. Our Suppliers are required to do the same, and shall, upon our demand;

- Evidence their compliance with import/export rules, imposed by the Department for International Trade of the Government of the United Kingdom or any other applicable enforcement and/or regulatory agency or function of government.
- Evidence their compliance with national and/or international sanctions, treaties and/or embargoes imposed by the Department for International Trade of the Government of the United Kingdom or any other applicable enforcement and/or regulatory agency or function of government.
- Generally, Suppliers shall identify and manage their business operations to any and all applicable trade restrictions set upon any individuals, corporate entities, countries, or states.

5.9 Financial Markets and Trading

Suppliers to PD Ports are often party to highly sensitive commercial information that is not in the public domain ('the Sensitive Information').

As such, Suppliers shall ensure that they have sufficient controls and processes in place to prevent their employees, agents or any other person exploiting or using the Sensitive Information in any way other than what would be required in the reasonable execution of their duties to their employer and/or PD Ports as the case may be, including but not limited to;

- Using, or procuring the use of, the Sensitive Information to gain any unfair and/or illegal advantage in the trading of shares, commodities, or any other investment in a financial instrument or investment vehicle on any publicly listed stock exchange.
- Sharing Sensitive Information to 3rd parties without appropriate permission from their employer and/or PD Ports, as the case maybe.
- Assisting any person or corporate entity in any of the above.
- Any actual or potential breach of the Market Abuse Regulations (MAR) as defined by the Financial Conduct Authority in the United Kingdom, or any other applicable law, statute or regulation in place at the time in the applicable country or territory in which the actual breach has, or potential breach may, occur.

5.10 Payment

We are committed to the fair and prompt payment of our employees and Suppliers. We expect our Suppliers to make this same commitment by ensuring compliance with the requirements of the Equal Pay Act 1970 and for Suppliers to be:

- Fair and reasonable in their payment practices with other organisations by ensuring that all undisputed invoices are paid in accordance with the applicable contract with no greater deviation than 5% by volume.
- Fair and reasonable in their payment practices with their employees by ensuring that they comply with all applicable national laws, conventions and mandatory industry standards regarding working hours, overtime, wages, and benefits. The Supplier shall pay workers promptly and convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted.

5.11 Health and Safety

We expect our Suppliers to strive to implement the standards of occupational health and safety to a high level by applying a health and safety management approach appropriate for the business. The Supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, to preserve the health of employees, safeguard third parties and prevent accidents, injuries, and work-related illnesses. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues.

5.12 Supply Chain Transparency

Suppliers are responsible for ensuring that standards equivalent to those contained within this Code are communicated throughout their own supply chains.

Suppliers should maintain appropriate due diligence processes for the selection and management of subcontractors and suppliers.

Suppliers shall:

- Monitor supply chain risks.
- Identify high-risk supply chain activities.
- Investigate actual or suspected non-compliance.
- Implement corrective actions where necessary.
- Cooperate with reasonable due diligence requests from PD Ports.

Upon request, Suppliers shall provide reasonable information regarding the structure and governance of their supply chains.

5.13 Social Value and Community Impact

PD Ports recognises the important contribution that businesses can make to the economic, social and environmental well-being of local communities.

Suppliers are encouraged to:

- Support local employment opportunities.
- Invest in workforce development and apprenticeships.
- Promote skills, training and education initiatives.
- Engage positively with local communities.
- Support local businesses and SMEs where reasonably practicable.

Suppliers should seek opportunities to create lasting positive social value in areas affected by their operations.

6. Monitoring

6.1 PD Ports is committed to the fair application of this Code of Conduct and we understand that certain requirements within the policy may require a reasonable amount of time to be made available for Suppliers to bring themselves into compliance.

6.2 However, we do not tolerate any unlawful or illegal activity of any kind.

6.3 To ensure that the requirements of our Code of Conduct are maintained, we will undertake monitoring and periodic auditing of our Suppliers adherence to it and agree remedial or corrective action with Suppliers on a case-by-case basis.

6.3.1 Suppliers shall, upon receiving a request from us (or our appointed agent), provide access to all relevant information and documents needed to verify the conformance with the Code of Conduct.

6.4 Further, we reserve the right, upon reasonable notice, to monitor and/or audit the physical premises or operations of our Suppliers to verify their conformance with the Code of Conduct.

6.5 In any event, should we have a legitimate reason to believe a Supplier is failing to comply with the requirements of the Code of Conduct, then we reserve the right to take further action, which may include the following and be dependent upon the severity or materiality of the breach;

- Stop the procurement of any further goods and/or services from the Supplier and/or terminate the contractual commitments in place.
- As appropriate, request the Supplier change their business practices which are not compliant with the Code of Conduct, or, demand that any non-unlawful or illegal practices are stopped, and we may notify regulatory, governmental or enforcement authorities/agencies where applicable.
- Request information from the Supplier and/or ask the Supplier to evidence and/or for the Supplier to provide us with the opportunity to undertake due diligence on their business to establish compliance with this Code of Conduct.

7. Acceptance of compliance with PD Ports Supplier Code of Conduct

- PD Ports is committed to maintaining high standards in corporate ethics, the environment, human rights and behaviour.
- Therefore, PD Ports seek to ensure that all the company's suppliers operate in compliance with the standards of our Supplier Code of Conduct as set out above.
- We ask you to sign this acceptance and thereby acknowledge and agree to the standards stated in the Code and your company's acceptance to comply herewith.
- We, the undersigned, hereby acknowledge and agree to the standards stated in the Code and hereby accept to comply herewith.

Signature: ……

Name: ……

Position: ……

Date: ……

For and behalf of: ……

8. Version Control

DOCUMENT REVISION HISTORY			
Revision Date	**Version No**	**Revision Description**	**Revised by**
22/9/2021	**1.0**	Document Issue	Shaw Dewar
20/10/2023	**2.0**	2023 Policy Review a) Climate Change and Greenhouse Gas Emissions requirement added to section 4.7. b) Single Use Plastics requirement added to section 4.7. c) Addition of subsection 5.1.7 - Mental Health and Well-being. d) Addition of section 5.2 - Engagement with Local Communities	Shaw Dewar
	3.0	2026 Policy Review a) New CEO Introduction from Paul Foreman b) Updates to Sections: 4.7 and 5.1.8 – reporting hotline number update. c) Addition of Sections: 3.4, 4.5, 5.12 and 5.13	Shaw Dewar