

P&O FERRYMASTERS HOLDINGS LIMITED POLICY STATEMENT

P&O Ferrymasters Holdings Limited and its subsidiary undertakings (referred to as 'P&O Ferrymasters') means P&O Ferrymasters Limited and any other company within the P&O Ferrymasters Holdings Limited Group.

1. Customer Service Policy

P&O Ferrymasters is committed to meeting Customer's expectations in the storage and transfer of goods from the point(s) of origin to the point(s) of delivery, free from damage, loss or theft and on-time.

This is a fundamental part of the company's customer service and commercial consideration.

The Board of Directors champions this policy: their responsibility is to ensure that business managers have the belief, competence and resources to implement the policy and achieve its aims. The support and professionalism of our people will make the policy succeed.

In order that we might best meet the needs of our customers, we will:

- Achieve operational excellence through the use of continuous internal and external improvement processes in commercial development, contract implementation, operational execution, performance measurement, sales aftercare and financial settlement processes with our customers. This is undertaken with Transport Orders being agreed, implemented, executed, measured, communicated and invoiced within pre-agreed arrangements.
- Always give customers a prompt, polite, courteous and informed response to any query within the agreed timescale, and that their order requirements are fulfilled or, when unavoidable circumstances prevent this that corrective action is taken, where possible, and that they are kept fully informed.
- Ensure that all staff, within their sphere of influence, recognize that they have a duty to provide a level of service that our customers are happy with, and that it endeavours not to compromise the customer relationship, or repeat business.
- Provide sub-contractors and suppliers with all of the information they require to provide us with a level of service consistent with the needs of our customers and that they will be monitored and that we will periodically review their performance
- To investigate service failures so that suitable measures are put in place to prevent reoccurrence of the problem and undertake periodic assessments of these via our audit programme.

This policy will be subject to regular consultation and annual review.



Thorsten Runge – Managing Director

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2 . Company Organisation

In order that we might best meet the needs of our customers, the company is structured to facilitate four divisions; Trailers, Intermodal, Contract Logistics and Freight Management.

- The Trailer division utilizes an extensive fleet of trailers, utilizing the services of sub-contracted traction.
- The Intermodal division utilizing our own container fleet, a joint venture railhead and dedicated trains.
- The Contract Logistics division controls own warehousing activities and the freight managed accounts, utilizing the services of own assets and third party logistics service providers.
- The Freight Management division controls forwarding services, utilizing third party logistics service providers.

Supporting these business activities and harmonizing policy & strategy throughout the company central functions manage Human Resources, IT, Insurance, Contracts & Claims and Risk & Compliance.

Details of the company organization are published on the company website and intranet sites. Each operating location has its own structure, defined in detailed organization charts and job profiles. Authorities and accountability are detailed in these specific job profiles.

3. Responsibilities

Individual Responsibilities under the Customer Service Policy:

Managing Director - Company policy and specifically all commercial, customer service and health & safety and quality issues.

Finance Director - Accounting policy, financial management and capital authorization.

Director – Trailers - Operations and implementation of customer service and quality systems within the trailer activity. Development of commercial strategies within the activity and identification of potential business growth areas.

Director - Contract logistics – Operations and implementation of customer service and quality systems within our warehouse activities, freight managed accounts and the Irish trailer activity. Development of centralized commercial strategies and identification of potential business growth areas, Strategy regarding health, safety, environmental and quality management.

Director – Freight Management - Operations and implementation of customer service and quality systems within the freight management offices. Development of commercial strategies and identification of potential business growth areas within the division.

General Manager – Intermodal - Operations and implementation of customer service and quality systems within the intermodal activity. Development of commercial strategies within the activity and identification of potential business growth areas.

IT & Communications Director - Policy and strategy on the provision and use of the information and communications networks.

Head of Human Resources - Provision of advice to the company on all aspects of human resource management; implementation, co-ordination and control of personnel & training strategies.

General Manager – Risk & Compliance – Provision of advice to the company on all aspects of the management of quality, safety, health, security and the environment. Provision of advice to the company on all aspects of the carrier management policy & procedures and implementation of strategies

Group Quality & Audit Manager - Provision of advice to the company on all aspects of quality management, certifications and control of the audit programmes.

Functional

General Managers - Conduct of operational and commercial activities in their designated countries/business areas; implementation of the customer service & quality system.

Operations Managers - Management of all operational activities in their designated location/region; approval & monitoring of sub-contract hauliers.

Customer Service Managers - Management of all customer service activities in their designated location/region.

4. Our Customer Service System

The company Customer Service System is enshrined in a series of integrated management system (IMS) documents of which, this Customer Service Policy is one part. The Policy identifies and establishes the relationship between our customer service system and the international standard ISO 9001 and ISO 14001. Supporting this policy is a number of procedures which document the delivery of our service to the customer from start to finish. These procedures are made available to all staff via the Company Intranet. Associated with the service delivery are a number of quality records, both data-based and hard copy. These are identified in the appropriate procedure, where retention periods for the records are also specified.

The company Policies and Procedures are formulated by the Risk & Compliance dept., in close co-operation with employees at all levels and in all areas of the business. Procedures are vetted and approved by senior managers, representing the documented business activity. Amendments and improvements to the system documentation, which may originate from individual employees, or through the review system, or audit programme are passed to the Risk &

Compliance dept. for action. In this way, we ensure company-wide applicability and approval, prior to changes being implemented

Service and, particularly, its development and improvement is an ongoing process in P&O Ferrymasters. It begins with the corporate strategy plan, which identifies the investment in resources, skills and processes required to meet the needs of our customers. Our managers are required to work within the parameters of this plan to ensure that they have appropriate levels of resource and skills to fulfill P&O Ferrymasters commitment to providing customer service of the very highest standard.

In order that we can maintain this high level of service, a series of performance reviews form part of our everyday working life. Within each business area regular Management meetings assess the efficiency of our systems and processes, our service performance and business results. Similarly, the managers in charge of our smaller offices carry out this review function and feed the results to the senior Management Team, within their own business area. Summaries of Management Team deliberations, together with recommendations for change, are passed upward to the Board of Directors for strategic review. Thus, the credibility of and responsibility for, customer service is reinforced at the highest level.

The Integrated Management System (IMS) is defined in a number of Policies and Procedures, published on the Company Intranet. The responsibility for modifying and reissuing the policies and procedures rests with, either the Operational, Risk & Compliance, Insurance, Claims & Contracts, or the Human Resource departments. These departments provide support and guidance to the company management, who are responsible for the implementation of the policies and procedures.

The current versions of the policies and procedures are published on the Company Intranet and staff are responsible for ensuring that they follow these latest versions and for using the current version of forms as published.

5.The POFM Assessment Standard System – PASS Program

The Integrated Management System (IMS) described in section 4 of this Policy has been developed over a number of years from a number of quality systems, registered to ISO 9001. In anticipation of changes in business operations, these quality systems were superseded in the mid-nineties by a process-based customer service system, albeit still registered to ISO 9001. Subsequent developments in Safety and Environmental legislation, the introduction of the environmental standard ISO 14001 and the requirement for 'hazardous goods' hauliers to operate to SQAS standards led to a further migration of the customer service system into IMS.

As it became apparent that neither ISO 9001 nor ISO 14001 registration fully satisfied the needs of our IMS, which is primarily aimed at improving business performance for our customers, employees and the public at large, an internal assessment system, based on the model devised by the European Foundation for Quality Management was introduced. This assessment system has been named POFM Assessment Standard System (PASS).

Within the PASS system, assessment is undertaken of the following areas:

Providers

- **Operating Process** – How critical processes are managed, performed, measured and improved.
- **Safety, Quality and Environmental** – How corporate and legislative instructions and requirements are met.
- **Training and Career Development** – How recruitment, training, objective setting and feedback are optimized.
- **Resources and Support Functions** – How information, equipment, suppliers and technology is provided and validated.
- **Leadership and Communication** – How management teams own, inspire and communicate corporate ideas.

Results

- **Customer Performance Analysis** – How performance is measured, complaints handled, customers communicated with.
- **Business Results** – Performance against plan, targets and achievements.

The audits which are carried out by Assessors, managed by the Group Quality & Audit Manager and augmented as necessary by other specialists, focuses on each business area. Process auditing of each of the 'Providers' and the 'Results' produces an individual score for each section assessed.

Key locations are subject to a full assessment every two years, with the smaller locations audited on a three to four yearly cycle. The assessment team prepares a report for the Director & General Manager, responsible for the activity. This report reflects the assessment of the management system in specific KPI terms, giving each category a percentage score. The report also identifies Mandatory and other Recommended actions. The audit findings and subsequent remedial actions are discussed and approved at the assessed sites next Management Meeting.

As the assessment generates a series of scores for each area audited, the General Manager has a 'bench-mark' against which to measure business improvement. This combined with the focus of detailed Improvement Actions and the KPIs given in the report, enables real progress to be made. In this way, the assessment process becomes a vehicle for change rather than a 'one-off' pass/fail.

To meet the Company objective of PASS being "an acceptable viable alternative to ISO 9001", it is necessary for there to be an effective follow up to the assessment process. Initially, follow up consists of the General Manager confirming that remedial actions have been carried out. These actions are then validated and closed-out by the Group Quality & Audit Manager. In the event that actions have not been taken, or were inappropriate, the Group Quality & Audit Manager administers a follow-up system similar to the HSE improvement / prohibition notice. A notice of mandatory issues not actioned is sent to the General Manager, with copy to the relevant Director.

6. Our People

P&O Ferrymasters recognizes that its most valuable resource is our employees. Naturally therefore, we appreciate the benefits to be gained from a comprehensive training and development strategy which is, itself, just one part of our overall human resource management programme.

The recruitment and selection process starts with the preparation of a job profile which accurately represents the requirement of the employing manager. The remainder of the process, reviewed and updated at regular intervals, ensures that we engage only those people who have the right blend of skills and experience, or the potential to learn, to meet the needs of our customers.

On joining P&O Ferrymasters, new employees complete an induction program, part of which is dedicated to Quality and Health & Safety. The new employees gain a thorough insight into what these factors mean to us and, more importantly, to our customers and suppliers. They will also be coached in their own roles and responsibilities in these areas.

Training and development, once in post, is treated as an ongoing requirement. Training needs are identified and assessed on an individual basis by immediate managers through the employee appraisal scheme. Comparison of existing skills/experience with those defined in the job profile, form the basis of the assessment. Further needs, on a corporate or departmental basis, may be generated by business plans, legislative changes or changes affecting our customers and their demands upon us. Provision of appropriate training, whether on the job or from a specialist external provider, is the responsibility of the Human Resource Department, working in close liaison with the responsible department/corporate management. Once training is completed, the employee(s) are further assessed by their immediate managers to establish whether the training need has been satisfied. It is through this process that we are able to develop our employees to deliver the levels of service defined by us and expected by our customers.

7. Our Methods

Whether we are doing business with a small company, arranging its first overseas consignment or with the major multi-national corporation, organizing an intensive inter-European export/import drive, we apply the same standards of service, based upon over sixty years of experience. This experience has enabled us to refine our methods to the extent that they reflect only the best industry practice. Documented procedures define the whole of our business process, from initial contact with the customer, right through to completion of movement. This whole process is underpinned by our in-house computer system which enables traceability to be exercised.

Prior to accepting a booking, our staff will check that we have the resources available to collect and deliver the consignment at the times requested by the customer. Similarly, when preparing a tender document, our Tenders team scrupulously examine the requirements and specifications to ensure that we have the resource capability to match. Only when we are satisfied that we fully understand the customer's requirement and that we can meet it, will we accept the booking.

The booking will be entered into the computer system by trained Customer Services employees, who will seek further confirmation of any changes that the customer might need. Once the information has been entered, it is visible and available to any of our employees who may have an involvement with the consignment. To assist in the monitoring and tracking of the customer's goods, every booking is allocated its own, unique reference number. At each stage of its progress, from collection through to delivery, movements can be tracked and the computer system is updated to display the current status of the consignment.

As might be expected from a transport company operating over 5000 pieces of equipment in support of an international customer base, we use a large network of reliable sub-contract hauliers. To maintain the levels of service which our customers have come to expect, we take great care in selecting our sub-contractors, and, indeed the suppliers of any other goods or services we use. An approved list is maintained as an interactive database, within the computerized operating system.

Sub-contractors and suppliers are provided with all of the information they require to provide us with a level of service consistent with the needs of our customers. We monitor and periodically review their performance and when the occasion merits, our employees will visit the sub-contractors/suppliers premises to observe their working practices and make recommendations aimed at maintaining the service levels.

To compliment the care taken in the selection of our sub-contractors, we use only equipment built to the highest standards. Our trailers, swap bodies and containers are supplied by builders of the highest repute and incorporate the latest in technological evolution. In service, each item of equipment is subject to routine and periodic inspection and, where necessary, repairs are undertaken. Movements are scheduled around routine maintenance to minimize disruption of traffic flows. Particular attention is paid to security cords and to canopy integrity so that consignments can be sealed and weather-proofing maintained. Items of equipment which are not in a usable condition are identified as awaiting repair/refurbishment, thus avoiding further use. Records of equipment maintenance undertaken are held centrally.

Once loaded with the customer's consignment, the trailer is sealed and the driver will complete a CMR collection note, describing the consignment, quantity and condition. Equipment can be tracked throughout a movement. En-route, the trailer will be checked for damage and seal integrity at port of export and again on disembarkation. At the point of delivery, the driver will present the CMR note, enabling the recipient of the consignment to acknowledge the delivery condition and quantity. In the event of any consignment sustaining damage and or loss, the customer will be informed at the earliest opportunity and the circumstances of the incident recorded and investigated. Further security safeguards will be provided for consignments of theft attractive and/or high value goods. Similarly, additional precautions will be taken for consignments requiring movement under temperature-controlled conditions. In such cases, Reefer trailers will be provided, which permit continuous monitoring of air temperature and which can provide a printed read out of temperature conditions.

As part of the obligation to our customers, we understand the need to deliver consignments on time, in an undamaged condition and, to achieve these ends, our operating procedures relate to a minimum of load handling. However, there may be circumstances under which the trans-shipment of a consignment becomes necessary. In such a case, our employees or an approved supplier will handle the operation using specialist equipment and utilizing appropriate skills

and experience. Similarly, if any consignment requires storage, this will be provided in a secure environment, free from cross-contamination and clearly identified with the consignment booking number.

Identification of any service failure, such as late delivery or vehicle/load damage is a priority. The use of tracking, our computer based staging system, and regular contact with our sub-contractor's drivers enables us to pre-empt most difficulties before they arise. Our employees are trained to resolve problems and as soon as a deviation from the customer's requirements is noted, they will notify the change in the service incident record and take appropriate action.

Detailed procedures define the way in which any service failure will be investigated and resolved. Individual managers regularly review records and associated data, to satisfy themselves that suitable measures have been taken to prevent recurrence of problems. Where more significant or widespread action is necessary, the Directors will commission a project team to investigate and make recommendations for procedural amendment.