

Environment, social and governance (ESG) policy



Applicable to	Peacock Container Holding Pte. Ltd. and its group of companies (including Peacock Group Holdings B.V.) (Peacock Container or the Peacock Container group)		
Effective date	29 December 2023	Review date	31 December 2024
Version	1.0	30 December 2022	Reviewed and reapproved with <ul style="list-style-type: none"> • additional bullet point regarding ESG benchmark levels under Why implement an ESG policy? on page 2; • further detail on net zero greenhouse gas commitment under 1. Environment on page 3 • revision to cumulative incident reporting matrix to refer to current year and prior year (instead of specific years) on page 6
	2.0	29 December 2023	

Environment, social and governance

Environment, social and governance (**ESG**) issues address our impact on

- the environment;
- society (including our people and the communities in which we operate) and
- governance of the risks to which we are exposed in our business activities.

Why implement an ESG policy?

The Board of Peacock Container recognises that ESG issues have a material effect on the sustainable performance of our group of companies. The aim of this policy is to ensure that ESG issues are considered at all levels of our business activities, and addressed in accordance with national and international laws, regulations, codes and principles.

Specifically, Peacock Container aims to achieve this by:

- ensuring that our vision and ESG objectives are relevant, understood and communicated within and outside our organisation and that our personnel demonstrate alignment to them;
- identifying, evaluating and managing all material ESG risks in the business activities undertaken by the Peacock Container group in a responsible and ethical way;
- ensuring that key decisions are only taken after full consideration of all material ESG issues and risks and integrating ESG considerations in business thinking;
- including ESG as an agenda item for all Board meetings and establishing standardised Board reporting to monitor incidents and their impacts;
- identifying an individual who is responsible for ESG matters.
- setting, and aiming to achieve, targets for environmental, social and governance matters which will be reported, monitored, reviewed and disclosed to our personnel and shareholders;
- providing appropriate information, instruction and training and ensuring that this policy is communicated to all persons working for Peacock Container group companies.
- working together with our customers, suppliers and business partners to encourage them to adopt these principles or similar policies with the same outcomes;
- aspiring to achieve benchmark levels in environmental, social and governance performance and making these themes core to what we do.

Who does this policy apply to?

This policy applies to Peacock Container Holding Pte. Ltd., its affiliates (including Peacock Group Holdings B.V.), its subsidiaries, and joint ventures in which we have a controlling interest (referred to as **Peacock Container** or **our group** in this policy). We also seek to enforce similar principles in any joint ventures and consortia in which we have a minority interest.

- All directors, officers, employees, contractors, advisors, consultants, representatives and others performing services for Peacock Container (**personnel**) should familiarise themselves with and align their behaviour to this policy.
- We encourage suppliers of goods and services to Peacock Container to adopt principles similar to those set out in this policy.

Responsibility and review

- The Board of Peacock Container has overall responsibility for implementing this policy. Progress in implementing this policy will be reported regularly to the Board.
- This policy will be reviewed at intervals of not more than 12 months to ensure that its objectives remain relevant, and that the most appropriate measures are being taken to achieve them.

Our commitment

1. Environment

In its business operations, Peacock Container is committed to:

- ensuring that as far as reasonably practicable it minimises impact on, and protects, the environment;
- as part of responsible corporate citizenship, achieving net zero scope 1 and 2 greenhouse gas (GHG) emissions by 2050, in line with efforts to limit the global average temperature increase to 1.5°C above pre-industrial levels; and in relation to emissions, Peacock Container will
 - continue to influence and support reduction of scope 3 emissions that result from upstream and downstream activities;
 - annually report scope 1, 2 and material scope 3 emissions to its Board and shareholders in line with the GHG Protocol, consistent with our support for SDG 9: Industry, Innovation and Infrastructure and SDG 13: Climate Action;
- actively pursuing initiatives to mitigate the environmental impact of its operations, including by
 - promoting and supporting the transition to alternative fuels;
 - achieving improved efficiency in its consumption of energy and other resources;
 - improving the efficiency of its waste management, including by reducing, reusing and recycling;
- encouraging all personnel to consider the environmental consequences of their actions and to seek to minimise the impact where reasonably practicable;
- measuring, recording and monitoring key environmental metrics relevant to its business, including energy consumption, greenhouse gas emissions and waste management;
- ensuring that the Peacock Container group, and its suppliers, service providers, customers and stakeholders act in compliance with all applicable environmental laws, regulations and obligations in their activities; and where practicable adopt relevant international environmental standards.

Further details of our commitment to the environment can be found in our [Environment policy](#).

2. Social

In its business operations, Peacock Container is committed to:

- promoting diversity, equity, inclusiveness and teamwork among its personnel, treating everyone fairly, equally and with the same respect, and valuing the contributions made to its team by people of all social, ethnic and professional backgrounds and abilities;
- eliminating from the work environment
 - discrimination, intimidation and abuse on the grounds of race, colour, ethnicity, religion or belief, nationality, gender (original or reassigned), sexual orientation, marital status, pregnancy and parenthood, social or educational background, age or disability;
 - bullying, harassment or retaliation of any sort by or towards its personnel;
- respecting the individual human rights of its personnel under international law and norms, including the right to representation and to have their voices heard through regular employee engagement;
- applying fair and objective criteria in the treatment of personnel at all stages of employment, including during recruitment, performance evaluation, grievance handling and disciplinary actions;

- providing a safe, healthy, secure and flexible work environment, in which health and safety risks are effectively managed and controlled, and any QHSE incidents are reported regularly to the Board and corrective action is taken to prevent recurrence;
- promoting Peacock Container's commitment to the wider society and community development as well as local employment; and supporting local and international initiatives, with the goal of making a positive contribution to local communities and to organisations relevant to its business.

Further details of our commitment to human resource and human rights issues can be found in our **Employment policy** and **Labour and human rights policy**.

3. Governance

In its business operations, Peacock Container is committed to:

- carrying on its business honestly, fairly and responsibly, in accordance with the highest standards of governance and ethics, and in compliance with all applicable national and international treaties, laws and regulations in the countries where it operates;
- identifying, evaluating and managing the risks to which its business is exposed, including but not limited to
 - investigating and screening its clients and other counterparties;
 - raising awareness within its organisation, and taking measures to detect and prevent fraud, suspicious activities and transactions in violation of international trade sanctions;
 - taking all reasonable measures to secure and protect from unauthorised disclosure personal and confidential data used in its business;
 - implementing practices and systems to minimise the risk and impact of cybersecurity attacks;
- maintaining a channel through which whistleblowers within and outside the organisation can notify issues of concern and address grievances;
- ensuring the Board of Peacock Container has oversight of all material business activities (including ESG matters and key decisions) through regular Board meetings where ESG is an agenda item.

Further details of our commitment to governing business risk can be found in our **Business ethics policy**, **Trade sanctions policy**, **Fair competition policy**, **Know your counterparty policy** and **Risk management policy**.

Reporting, disclosure and communications

1. Reporting key ESG metrics on emissions, energy and waste, and HSE incidents

1.1 Peacock Container maintains annual records, consolidated on a group basis, of

- greenhouse gas emissions arising from its business activities;
- energy consumed (and, if and when applicable, generated) at its operating offices;
- (if applicable) water consumed for industrial (but not domestic) purposes in its activities;
- waste recycled or disposed of by its operating offices;
- HSE incidents arising from its business activities.

1.2 This data is reported

- to sustainability rating agencies such as EcoVadis and GRESB when required for annual assessment of the Peacock Container group;

- to Peacock Container group shareholders in time for inclusion within annual portfolio reporting required under EU Sustainable Finance Disclosure Requirements regulations and any other mandatory or voluntary reporting initiative applicable to the group's investors;
- as and when required, to the Board of Peacock Container.

2. Reporting on general ESG progress

2.1 Peacock Container reports at each scheduled Board meeting on its general progress in implementing ESG initiatives, as well as ESG risks and opportunities, including

- development and implementation of corporate ESG-related policies and procedures;
- compilation of data on emissions, energy, waste and other metrics;
- personnel training;
- progress in sustainability rating assessments, including scores received;
- social initiatives undertaken, and governance tools and processes implemented;
- any other ESG information requested by the Board.

3. Reporting on incidents with ESG implications

3.1 Peacock Container must report to the Board **individual operational incidents** involving personal injury or fatality, health and safety or environmental impact, or other serious financial, compliance, data breach or reputational issues in accordance with the **reporting matrix: individual incidents** below:

reporting matrix: individual incidents	
type of impact	report to Board
health and safety: fatality	within 6 hours after becoming aware
health and safety: other (including personal injury)	within 24 hours after becoming aware
environmental: spillage/leakage to environment of > 5 litres of product/debris from containers, or other material accidental environmental damage	within 24 hours after becoming aware
any other impact rated \geq level 3 in the impact matrix below	within 24 hours after becoming aware
any other impact rated < level 3 in the impact matrix below	at next scheduled Board meeting

Below is the impact matrix referred to in the reporting matrix above.

impact matrix					
type of impact	1 = very low	2 = low	3 = medium	4 = high	5 = very high
property damage/loss (P)	<US\$50,000	50-US\$100,000	100-US\$250,000	250-US\$500,000	>US\$500,000
loss of data/IT systems essential to operations (D)	restorable in 6 hours at no cost	restorable in 12 hours at cost \leq US\$25,000	restorable in 72 hours at cost \leq US\$50,000	restorable in >72 hours at cost \leq US\$100,000	not restorable except at cost >US\$100,000
personal injury (I)	first aid treatment required	medical treatment required	serious/life-changing injuries to 1 person	death of 1 person or life-changing injuries to >1 person	death of >1 person
environmental (E)	spill contained: no leakage to environment	leakage of <5 litres of non-toxic product to environment	leakage of >5 litres of non-toxic product to environment	leakage of <30 litres of toxic product to environment	leakage of >30 litres of toxic product to environment
financial/economic (F)	<US\$50,000	50-US\$100,000	100-US\$250,000	250-US\$500,000	>US\$500,000
operational disruption (O)	<6 hours + no client impact	<6 hours + client impact	<72 hours + client impact	<30 days + client impact	>30 days
compliance (C)	minor breach by individual personnel	non-compliance by Peacock Container, but no penalty	penalty for non-compliance by Peacock Container but no disruption to operations	penalty for non-compliance + temporary suspension of operations	penalty for non-compliance + permanent termination of operations

reputation (R)	negative publicity to individual client	negative publicity within industry	negative publicity distributed within mainstream or social media	negative publicity resulting in impact from financiers/ investors	negative publicity resulting in regulatory penalty/ies
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3.2 In addition, at each scheduled Board meeting, a designated Peacock Container representative must report to the Board the **cumulative incidence, severity and financial impact** of operational incidents involving personal injury or fatality, health and safety or environmental impact, or other serious financial, compliance, data breach or reputational issues which have occurred in the current year to date, compared to the equivalent period in the previous calendar year, in accordance with the sample **reporting matrix: cumulative incidents** below:

reporting matrix: cumulative incidents				
impact	incidents (number)		financial impact	
	YTD current year	YTD prior year	YTD current year	YTD prior year
1 = very low				
2 = low				
3 = medium				
4 = high				
5 = very high				

3.3 As part of its risk management process, Peacock Container also identifies and reports annually on the top 5 risks to the business and any actions taken or required to mitigate these risks.

4. Communication strategy on ESG issues

4.1 In addition to the reporting obligations outlined above, Peacock Container will develop a strategy for communication with stakeholders on ESG issues which is appropriate – in terms of scope, format and method of communication - to its size and progress in achieving ESG objectives.

Training

Peacock Container will develop a plan for training of its personnel on ESG issues including

- targetting at least 2 training events or opportunities per person per year;
- monitoring and recording the number of employees completing the training; and
- where practicable, seeking feedback on the quality of training provided.