



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It outlines the steps taken by the Stena Line (UK) Limited and its subsidiary companies to prevent Slavery and Human Trafficking in its business and supply chains for the financial year ended 31 December 2020.

This statement covers the following subsidiaries of Stena Line (UK) Limited:

Stena Line Limited

Stena Line Irish Sea Ferries Limited

Stena Line Ports Limited

Stena Line Ports (Loch Ryan) Limited

Stena Line Manning Services Limited

Our Position

Stena Line (UK) Limited and its subsidiaries have a zero tolerance to any form of modern slavery and are committed to conducting business with integrity and in an ethical and socially responsible way. Stena Line (UK) Limited is part of the Stena AB Group. The core values of the Stena AB Group businesses are Care, Innovation and Performance; whereby all Stena entities follow the values contained in the Principles, convictions and basic values for Stena AB and also the Code of Governance.

Organisational Structure and Supply Chain

Stena Line is an international transport and travel service company and is one of the world's leading ferry operators. Stena Line (UK) Limited and its subsidiaries operate passenger and vehicle ferries over six strategically located routes across the Irish Sea and between the Republic of Ireland and France as well as operating the ports of Holyhead, Fishguard and Loch Ryan.

Stena Line's mission is to increase the value for our customers through affordable and seamless ferry transportation with an absolute commitment to safety and reliability, and a reduced environmental footprint. We deliver efficiency and sustainability through care – care for our customers, care for resources and care for each other.

Throughout its operations Stena Line (UK) Limited and its subsidiaries obtain a variety of goods and services from global suppliers. Our aim is to always maintain a competitive, reliable and sustainable supply chain wherever we operate. In dealing with our suppliers, Stena Line endeavours to always act in a legal, ethical and socially responsible manner.

Stena Line (UK) Limited and its subsidiaries employed an average of 621 shore based employees and 1,109 seafarers in 2020. The seafarers were principally employed via a subsidiary in Singapore.

In May 2020, as a result of the COVID-19 pandemic, Stena Line (UK) and its subsidiaries made 150 employees redundant.



Relevant Policies and Actions

- A Code of Conduct has been adopted by the main board of the Stena AB Group to underscore the principles by which the Stena AB Group conducts relations with business partners, employees and other stakeholders <https://www.stena.com/core-values/>.
- The Code of Conduct applies to all companies and businesses within the group and specifies the expected behaviour of all employees and business partners with regard to social and environmental standards.
- The Code of Conduct states:
 - We shall support and respect the UN Universal Declaration of Human Rights - We support the International Labour Organisation's International Program on the Elimination of Child Labour (IPEC), with the aim of the abolition of child labour in our sphere of influence; and
 - We do not accept any form of forced labour and we do not accept the use of prison labour or illegal labour in the production of goods or services for us or in the operations of our suppliers or any other parties with whom we cooperate.
- All employees are encouraged to report any suspected or observed violations of the law or the Code of Conduct.
- All employees are empowered to discuss and report openly. If an employee prefers to be anonymous they can use an external "Whistleblower" function.

Stena Line's recruitment procedures include screening processes to confirm eligibility to work in order to protect against Modern Slavery and Human Trafficking.

All employees working in the maritime sectors are subject to adherence to the Maritime Labour Convention (MMLC) 2006 standards for conditions of employment.

There are 4 trade unions representing employees in the UK, Nautilus International (Officers), the Railway, Maritime and Transport Union (RMT)(Ratings and Dockers).Transport Salaried Staffs 'Association (TSSA)(Office based workers) and Unite (Dockers based in Birkenhead). Collective Bargaining Agreements are in place establishing the general principles and ways of working between the parties.

Stena Line sets the same high requirements and standards on its business partners as it places on its own business conduct and operations. Stena Line has implemented a Supplier Code of Conduct (<https://www.stenaline.com/supplier-info>) to ensure all business partners adhere to the highest standard of ethics. The standards set out in the Code are based on the International Bill of Human Rights (i.e. the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), UN Sustainable Development Goals and the eight core ILO conventions as set out in the ILO Declaration of Fundamental Principles and Rights at Work. This Code applies to all suppliers, contractors, consultants, agents and joint ventures engaged in business with Stena Line (the "Supplier").



Risk assessment, prevention and mitigation

Within our business operations

There are a number of teams across the Company identified as having a greater likelihood of coming into contact with Modern Day Slavery and will undergo mandatory training, namely onboard customer facing crew and check-in staff.

Within our supply chain

The Group General Management Team has made a commitment in its Sustainability Strategy to procure sustainably and responsibly, and it has been looking at how best to work with its supply chain to ensure they adhere to fair working practices.

Compared to the previous year the Company has made no significant changes to the nature of the products and services that it procures, and uses well known businesses and deems the risk of modern slavery to be low.

What we intend to do in 2021 / 2022

- A risk assessment of all main suppliers will be undertaken and contracts identified as medium and high risk will be asked to complete a Modern Slavery Assessment Tool;
- Termination of the contract will be highlighted as a last resort;
- Suppliers will be advised to alert the relevant authorities if they have concerns; and to notify the Company by phone followed up in writing. This will avoid delays in getting investigations started and victims rescued;
- Formulate a Procurement Policy outlining the Company's approach to sourcing its external needs, its relation to public procurement rules, the financial levels for different types of procurement and its approach to the use of SME's and local suppliers. The standard terms and conditions for suppliers will require them to uphold human and labour rights and to prevent modern slavery and human trafficking in their own operations and supply chains;
- Review the Whistleblowing Policy to make specifically providing detail on the approach to reporting any concerns (including someone that may be at risk of slavery or human trafficking), how these will be dealt with, and the protection of 'whistle-blowers';
- Review the Sustainability Policy detailing the Company's commitments to contribute towards the end of modern slavery and human trafficking;
- Review the Recruitment Policy detailing the Company's approach to recruiting people into the organisation, sourcing, selection, on boarding and induction, for example, ensuring appropriate right-to work checks are completed, everyone has an employment contract stating terms and conditions and they are paid directly;
- Review of the Complaints procedure providing a means for external parties to report concerns of Modern Slavery within the Company's business operations; and
- All policies will be available on the Company's intranet for staff to access. Further policies may be developed if required. The Company has a working protocol that outlines the process for development, sign-off and ownership of policies within the business. If employees do not comply with the policies, it may result in disciplinary action or dismissal.



Key performance indicators (KPIs)

Stena Line has a number of KPI's monitored at Executive and Corporate Performance level.

Existing KPI's:

- Collections against invoices issued – is how timely we are collecting the money
- Payments of invoices received – is how timely we are at paying our bills.

Our standard terms are 30 days and by making prompt payment, we hope that the creditors do the same e.g. pay their staff on time; and if we have persistent overdue debtors, it can act as a warning that the supplier may have difficulties and may resort to bad practices warranting further investigation.

For the following year we have set the ourselves the following KPIs in response to the introduction of the Modern Slavery Act 2015.

- Undertake a risk assessment of all main suppliers;
- complete a Modern Slavery Assessment Tool for 80% of all contracts identified as medium or high risk;
- Ensure all new main suppliers sourced by Group Procurement are aware of our Supplier Code of Conduct (and sign up to it);
- Ensure that 100% of employees who are customer facing or work within our Group Procurement team undergo mandatory training which specifically includes modern slavery; and
- Identify a UK partner agency to assist the Company with an internal awareness campaign to all employees regarding modern slavery including how to spot the signs and how to report issues.

Responsibility

The Stena Line (UK) Limited Board has the overall responsibility for ensuring that legal and ethical obligations relating to Slavery and Human Trafficking are met and that all those under the Company's control comply.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Stena Line (UK) Limited Board of Directors endorse this policy statement and is fully committed to its implementation.

This statement was approved by the Boards of Stena Line (UK) Limited, Stena Line Limited, Stena Line Irish Sea Ferries Limited, Stena Line Ports Limited, Stena Line Ports (Loch Ryan) Limited and Stena Line Manning Services Limited on 15 June 2021.

Ian J Hampton

Chief People, Communications & Fleet Operations Officer

15 June 2021