



## **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 2024.

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

Stena Line Limited

Stena Line Ports Limited

Stena Line Ports (Loch Ryan) Limited

Stena Line Manning Services Limited

Anglesey Land Holdings 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 seven 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 712 shore-based employees and 1,388 seafarers in 2024. The seafarers were principally employed via subsidiaries in Singapore.

### **Relevant Policies and Actions**



- Care and respect for people are core values within all Stena Line companies and we are fully committed to respect and support internationally recognised human rights. In June 2024, the Stena AB Board approved a Group Human Rights Policy, applicable to Stena Line and all fully owned companies within the Stena AB Group. This operates in addition to our Code of Conduct and increases our focus on sustainability and human rights. The Policy increases our ambition and responsibility. Stena companies must now follow risk-based human rights checks to prevent and reduce negative impacts on human rights in our operations and in our supply chains. While it is each Managing Director's responsibility to make sure that Stena governing documents are implemented and incorporated into each company, it is everyone's responsibility to be aware of and follow these guidelines.
- 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 [Stena's core values - Stena](#)
- 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 do not accept any form of child labour and shall always follow applicable laws and international standards regarding minimum working age.
  - We do not accept any form of modern slavery, including human trafficking or 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 anonymity, they can use the Company "Whistleblower" function. The Company is clear that all such discussions remain confidential and no one will be subject to sanctions due to a report in good faith of suspected misconduct.

All policies are 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 up to and including dismissal.

Policies are updated regularly and new employment legislation effective from 2023 including The Carers Act 2023, Amendment to the Employment Act 2002 (paternity leave improvements), Employment Relations (Flexible Working) Act 2023, Workers (Predictable Terms and Conditions) Act 2023 etc has now been enacted and implemented. Preparations are underway to ensure compliance with the impending Employment Rights Act 2024.

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



The Company has also introduced a Health Care Plan for all employees and increased the profile of its Employee Assistance Programme which provide additional and better opportunities for anyone forced to work to alert authorities to their situation.

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

The Company continues to be a main contributor to the UK Chamber of Shipping's "Anti Human Trafficking: Best practice guide" circulated widely across the industry. The Company are now also corporate partners of 'Scotland Against Modern Slavery', being one of the founding members of their new Transportation Group. This provides the Company with access to valuable resources and support from professionals on the frontline of prevention of modern slavery and trafficking, as well as being an opportunity to contribute towards debate and initiatives.

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/suppliers-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**

The Company has established a multi-disciplinary Working Group which is working collaboratively to consider initiatives and actions which will prevent Modern Slaves entering the workforce and/or the Company's supply chain. The Group has representation from HR, Recruitment, Procurement, Learning & Development, Internal & External Communications and Finance.

All ship and shore-based managers have participated in a mandatory Modern Slavery Awareness module.

### **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. A programme of training for employees in those teams is available online, namely onboard customer facing crew and check-in staff.

Modernised recruitment practices are in operation for recruiting people into the organisation, sourcing, selection, on boarding and induction. The Company undertakes extensive pre-employment checks and engages the services of a brand lead provider to undertake pre-employment checking,



including confirmation of the right to work in the UK. Every employee has an employment contract stating terms and conditions and they are paid directly into their bank accounts.

### **Within our supply chain**

The Group General Management Team has reinforced its commitment 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.

As a result, the Procurement Team have continued to focus on safeguarding the Company's supply chain from forced labour being introduced into our supply chain throughout 2024.

The Group employs a Procurement Sustainability Manager who has a strong focus on sustainability topics concerning the supply chain, for example:

- Human rights due diligence directive preparation
- Risk assessment of the procurement categories dimension
- Supplier self-assessments questionnaire

The Company utilises a Self-Assessment tool aimed at identifying high risk supply which was issued to 250 suppliers in 2024. It includes questions about:

- Human Rights; asking the supplier about any risks in their supply chain and about engagement in due diligence activities to prevent and mitigate those risk. (Human rights, forced labour, child labour).
- Labour standards; asking the supplier whether any procedures to prevent modern slavery.

Risk assessments have been undertaken for all 160 procurement categories to ensure visibility of the highest sustainability risks. The process remains under active review to ensure current best practice.

### **What we intend to do in 2025-2026**

- Continue to increase Supplier Code Of Conduct coverage in our supplier base; and
- Continue to issue Self Assessments Questionnaires on sustainability for high-risk categories and improve quality of dialogue with higher risk suppliers to ensure appropriate and necessary actions are taken to reduce/remove risks.
- Refresh guidance given to employees and managers regarding the signs of modern slavery/trafficking.

### **Key performance indicators (KPIs)**

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

- Collections against invoices issued (how timely we are collecting the money);
- Payments of invoices received (how timely we are at paying our bills); and
- Percentage of Supplier Code of Conduct confirmations returned.

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.

### **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 Ports Limited, Stena Line Ports (Loch Ryan) Limited, Stena Line Manning Services Limited and Anglesey Land Holdings on 28 April 2025.

We are also committed to ensuring that our suppliers, agents, consultants and contractors throughout our supply chain have or adopt a similar approach. All our suppliers and contractors are required to endorse and adhere to our Supplier Code of Conduct, which includes the above principles. All contracts to be entered into with suppliers and contractors will also contain provisions requiring both parties to comply with all forced labour laws and ensure that neither human trafficking, slavery nor forced labour is taking place either in its business or in any of its supply chains which would violate such laws. The Company shall have the right to terminate any such contracts if this commitment is breached.

Ian J Hampton  
Director