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 2021.

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
Freight Link Solutions Limited
Customs Link 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 627 shore based employees and 1,101 seafarers in 2021. The seafarers were principally employed via a subsidiary in Singapore.

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/about-stena/stenas-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 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 to be anonymous they can use an external "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 or dismissal.

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 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.

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.

In 2021 the Company appointed a Diversity & Inclusion Partner based in Gothenburg with an interest in issues concerning Modern Slaves.

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 mandatory training for employees in those teams is underway, namely onboard customer facing crew and check-in staff.

The Company's Recruitment Lead has undertaken a review of its Recruitment practices for recruiting people into the organisation, sourcing, selection, on boarding and induction, and confirmed that appropriate right-to work checks are completed, everyone has an employment contract stating terms and conditions and they are paid directly into their bank accounts.

Within our supply chain

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.

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. In 2021 this included adding a dedicated resource to the Group procurement team with a focus on supplier sustainability which includes prevention of modern slavery.

During 2021 the procurement team reviewed the feasibility of proposed measures to prevent modern slavery at the Company. Thereafter, the Company formulated a Procurement Policy and updated its Supplier Code of Conduct to be explicit that it does not accept any form of forced labour, modern slavery, prison labour, or any other form of comparable labour in the Supplier's production of goods or services. This was sent out to all relevant suppliers.

The Company has, in draft, Modern Slavery Assessment Toolkits for internal use and for issue to selected suppliers when finalised in 2022.

What we intend to do in 2022 - 2023

- Undertake a risk assessment of all main suppliers;
- Complete a Modern Slavery Assessment Tool for 80% of all suppliers identified as high risk;

- Ensure all new main suppliers sourced by Group Procurement are aware of our Supplier Code of Conduct (and sign up to it);
- Review of the Complaints procedure providing a means for external parties to report concerns of Modern Slavery within the Company's business operations; and
- 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.

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.

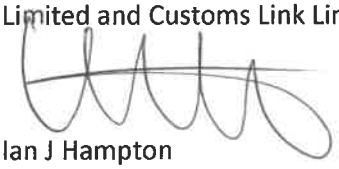
Our standard terms are 30 days and by making prompt payment, we hope that the creditors do the same e.g. pay their staff on time; and if we have persistent overdue debtors, it can act as a warning that the supplier may have difficulties and may resort to bad practices warranting further investigation.

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 Irish Sea Ferries Limited, Stena Line Ports Limited, Stena Line Ports (Loch Ryan) Limited and Stena Line Manning Services Limited on 24 May 2022 and approved by the Boards of Freight Link Solutions Limited and Customs Link Limited on 13 May 2022.



Ian J Hampton
Director
24 May 2022