

## Stena (UK) Limited

# **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 Stena (UK) Limited and its subsidiary companies to prevent Slavery and Human Trafficking in its business and supply chains for the financial year ended 31<sup>st</sup> December 2023.

This statement covers the following subsidiary companies of Stena (UK) Limited:

- Stena North Sea Limited
- Stena Ropax Limited
- Stena Icemax Limited
- Stena Evolution Limited
- Stena North Atlantic Limited
- Stena LNG (UK) Limited

The following subsidiary companies issue separate statements:

- Stena Drilling (Holdings) Limited <u>www.stena-drilling.com</u>
- Northern Marine Group Limited <u>www.nmg-stena.com</u>

### **Our Position**

Stena (UK) Limited and its subsidiaries have a zero tolerance approach to any form of modern slavery and are committed to conducting business with integrity and in an ethical and socially responsible way.

Stena (UK) Limited is part of the larger Stena AB Group. The core values of the Stena AB Group businesses are Care, Innovation and Performance.

### **Our Operations and Supply Chain**

Throughout its operations Stena (UK) Limited and its subsidiaries obtain a variety of goods and services from global suppliers. The aim is to establish and maintain a competitive, reliable and sustainable supply chain and in dealing with all of these suppliers endeavour to always act in an ethical and socially responsible manner.

### **Relevant Polices 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 <a href="http://www.stena.com/core-values/">http://www.stena.com/core-values/</a>
- 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.

- We support and respect the right of all employees' freedom to individually decide on joining associations and their right to bargain collectively.
- 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, he or she can use and external 'Whistleblower' function.

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 in 2023, preparation has been made to implement upcoming new employment legislation 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.

#### Responsibility

The Board has 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 statement outlines some of the actions undertaken by Stena (UK) Limited and its subsidiaries as part of their commitment to eradicate Slavery and Human Trafficking.

We are also committed to ensuring that our supplier, 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.

This statement has been approved by the Board of Stena (UK) Limited on 14th May 2024.

Yours sincerely,

S. Dominic Fernandez-Ares Managing Director