



# IRISH CONTINENTAL GROUP

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## **1.0 INTRODUCTION**

1.1 Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others. It is a crime that affects people of all genders, ages (including children) and ethnicities and is a violation of fundamental human rights.

## **2.0 ZERO TOLERANCE**

2.1 Irish Continental Group and its subsidiaries adopts a zero tolerance to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, an open and transparent approach is required by ICG and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chain.

2.3 As a Company, we fully support the government's objectives to eradicate modern slavery and human trafficking.

2.4 We believe that everyone has a right to be treated with dignity and respect at all times and under all circumstances.

## **3.0 DEFINITIONS**

For the purpose of this policy the following definitions shall apply:

3.1 Irish Continental Group (ICG) plc and its subsidiaries, Irish Ferries Limited (trading as Irish Ferries and Dublin Ferryport Terminals), Eucon Shipping and Transport Limited, Contarga Limited and Belfast Container Terminals (BCT) Limited.

3.2 Modern slavery is the term used within the UK and Ireland and is defined within the Modern Slavery Act 2015 (the 'Act') and the Criminal Law (Human Trafficking) Act 2013 respectively. The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

3.3 Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

## **4.0 POLICY PURPOSE**

4.1 This policy provides a framework to ensure:

- All ICG employees understand and are aware of their responsibilities in relation to modern slavery.
- The development of a strategic approach to identifying and tackling any modern slavery within ICG's supply chains.
- The implementation of robust, transparent, and proportionate governance and assurance processes.
- Reporting of instances (or concerns) of modern slavery.

## **5.0 RESPONSIBILITIES AND ACCOUNTABILITIES**

- 5.1 The Company recognises that it is responsible for promoting ethical business practices and policies that protect workers from being abused or exploited.
- 5.2 The prevention, detection and reporting of modern slavery in any part of ICG or its supply chain is the responsibility of all those working for us or on our behalf.
- 5.3 Therefore, this policy applies to all persons working for ICG or on behalf of ICG, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents and contractors.

## **6.0 CONTRACTOR RESPONSIBILITIES**

- 6.1 ICG requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains:
- Fully comply with the Act.
  - Are clear, transparent, accountable and auditable.
  - Are free from ethical ambiguities.
- 6.2 ICG expects that its contractors operate to the highest level of ethical standards and will hold their own suppliers to the same high standards.
- 6.3 ICG may require contractors who engage workers through a third party to obtain that third party's agreement to adhere to this policy and demonstrate how they seek to tackle any Modern Slavery within their supply chain.
- 6.4 Consistent with this approach, ICG may require employment and recruitment agencies, and other third parties supplying workers to teams in either Administration, to demonstrate their compliance with this policy.

## **7.0 AWARENESS AND TRAINING**

- 7.1 Human trafficking is a real concern for the maritime transport industry, and we acknowledge that there is a risk that criminal elements may seek to exploit Company services to undertake human trafficking activities. ICG and its key ship management service providers undertake regular training, including that provided by the United Nations Migration Agency in Ireland in relation human trafficking and labour exploitation. The purpose of this training is to provide:
- Improved understanding of human trafficking indicators and risk factors to enhance vigilance on board our vessels and at ports.
  - Guidance on treating victims of trafficking compassionately, confidentially and competently.
  - Actions to take when reporting suspected instances of trafficking on board vessels or at ports.

- Improved awareness of types of forced labour and distinction between forced labour and other forms of modern slavery, such as child labour, self-dorm and debt bondage.
- 7.2 ICG will raise awareness of this policy (and the Act) by notifying third parties in our frameworks, delivery partnerships and other organisations with which we regularly engage.
- 7.3 The policy will be published on the UK / IRL ICG website and the intranet.
- 7.4 ICG will look for opportunities to raise awareness of modern slavery and human rights abuses throughout the ICG community. Appropriate training and guidance will be provided, particularly for commercial and procurement staff.
- 7.5 ICG will provide modern slavery information, advice and guidance to contractors. Where feasible, ICG may also extend modern slavery training to contractors (however, contractors will retain their overall responsibility of providing training internally to their staff).
- 7.6 ICG will maintain records of all members of the ICG community who have completed modern slavery training.

## **8.0 ASSURANCE AND TRANSPARENCY**

- 8.1 ICG has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within either Administration or in any of ICG's supply chains.
- 8.2 ICG takes a risk-based approach to its procurement, contract management and supply chain management processes in relation to modern slavery and keeps them under continuous review.
- 8.3 As part of ongoing risk assessment and due diligence processes, ICG will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy.

## **9.0 NON-COMPLIANCE**

- 9.1 If any member of the ICG Community is discovered to have breached this policy, then appropriate action under our disciplinary policy.
- 9.2 If any contractor is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements.

## **10.0 PROTECTED DISCLOSURE MECHANISIM**

- 10.1 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 10.2 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

10.3 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

10.4 Under the Protected Disclosures Act 2014 (IRL) and the Public Interest Disclosure Act 1998 (UK) employees and contractors are protected from victimisation, harassment and or disciplinary action as a result of any disclosure made in good faith.

## **11.0 POLICY REVIEW**

11.1 This policy will be reviewed on an annual basis, to establish whether ICG's approach continues to follow best practice by:

- Assessing and interpreting any recent or emerging case law and best practice.
- Benchmarking ICG's activities against statements and action plans undertaken by similar public and private organisations.
- Re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.

## **12.0 POLICY AMENDMENTS**

*This policy does not alter or amend employees' contracts of employment or form a part of any such contract of employment. ICG may amend or change this policy from time to time to reflect legislation and to ensure best practice.*

Should you have further queries, or require clarification on any aspect of this policy, please contact the HR department.