

# Risk Management

## Overview

Exposure to risk is an inherent element to carrying out the business activities of the Group. Effective risk management and internal control systems are essential to protect the Group from exposure to unnecessary risks and to ensure the sustainability of the Group's business into the future.

The Board has overall responsibility for establishing procedures to manage risk, oversight of the internal control framework and determining the nature and extent of the principal risks that the Group is willing to accept in order to achieve its long-term objectives.

The Board has delegated the oversight and appraisal of the Group's risk management and internal control systems to the Audit and Risk Committee. The Audit and Risk committee reviews and monitors the effectiveness of the Group's risk management and internal control systems throughout the year. This assessment is carried out through the review of reports and presentations made by the Risk Management Committee (RMC) and by Group Internal Audit. The committee chairman reports to the Audit and Risk committee with an overview of its activities and conclusions. Further information on the Audit and Risk Committee activities is set out in the Audit and Risk Committee report (pages 91-95).

## Risk Management Governance Framework

### Board of Directors

The Board has overall responsibility for the management of risk and the oversight of the internal control framework which are designed to identify, mitigate and determine the nature and extent of the principal risks the Group is willing to accept in order to achieve its long-term objectives. The Board has created a culture of risk awareness throughout the organisation whereby risk consideration is embedded in the decision-making processes.

### Audit and Risk Committee

Responsibility has been delegated to the Audit and Risk Committee by the Board to provide oversight of the Group's risk management and internal control systems. It reviews and monitors the effectiveness of the Group's risk management and internal control systems throughout the year and then reports back to the board periodically on the work it has carried out. See Audit and Risk committee report (pages 91-95) for a full overview of the activities of the committee during the year.

### Risk Management Committee

The Risk Management Committee (RMC) established by the Group comprises senior members of management from across the three lines of defence, including Board representation. With its mandate from the Board and Audit and Risk committee, the RMC is tasked with;

- Making appropriate recommendations to the Board on all significant matters relating to the development of risk strategy and processes of the Group.
- Keeping under review the effectiveness of the Group's risk management systems.
- Reviewing the Group's risk exposures in relation to the Board's risk appetite.
- Maintaining a robust Group Risk Register and ensuring risks are identified comprehensively and assessed consistently across classified risk areas.

### Executive Management

Executive management is responsible for the effective operation of internal controls, designed to manage and mitigate the Group's principal risk and uncertainties. Risk consideration is embedded within the decision-making process.

#### 1st Line of Defence

Management Controls  
Internal Control Measures

The first line of defence rests with management acting through their staffs who are responsible for the design, implementation and monitoring of internal control measures within their respective business areas.

#### 2nd Line of Defence

Financial Control  
Risk Management  
Monitoring  
Compliance

The second line of defence comprises of oversight functions such as Group Finance and Group Marine and Safety. These functions are involved in policy setting and provide assurance over first line activities.

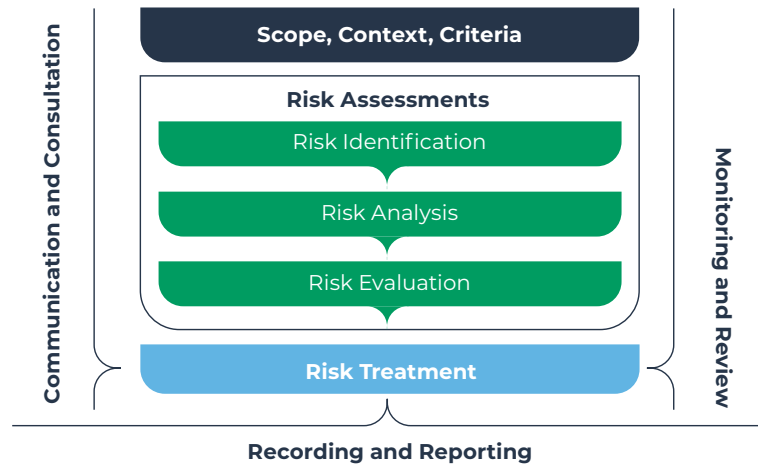
#### 3rd Line of Defence

Internal Audit

The third line of defence consists of the Group Internal Audit function, which performs independent oversight of the first two lines and reports directly to the Audit Committee on matters of internal control, compliance and governance.

**Risk Management process**

The Group follows international standard ISO 31000 (2018) 'Risk Management – Guidelines' in designing its risk architecture, strategy and protocols (RASP). The Group adopts an Enterprise Risk Management (ERM) system that takes a unifying, broad and integrated approach to managing risks and aligns risk management to the achievement of strategic objectives. Roles, responsibilities, risk management policy, objectives and process overviews are documented within the Group's Risk Code.



**Risk Management Process - Assessments and Monitoring**

The execution of the Group's Risk Management Process from an operation level is led by the RMC with strategic input from the Board and the Audit and Risk committee. The Board sets the Group's risk appetite for classified risk areas. Risk appetite is communicated through the adoption of Risk Appetite Statements. These statements, along with internal capabilities, resources and industry factors provide context to how the Group's strategy is pursued and to which risks are assessed. Stakeholder views with respect to climate and ESG issues, are considered by the Board in setting appropriate appetite levels. An overview of the Group's climate risk framework is set out in the section Task Force on Climate-Related Financial Disclosures. The Board has a low acceptance for risks that may impact safety of vessels, workers, customers and compliance with relevant laws and regulations.

The Group wide nature of the risk assessment and monitoring process, requires collaboration across departments and divisions within the Group. Each business owner is responsible for ensuring comprehensive risk identification and assessment is carried out covering their sphere of responsibility. Risks are identified through various means,

including the use of an identification tool guiding risk assessors through several internal and external factors in identifying potential barriers to respective objectives. Risks are assigned to risk owners with responsibility for the activity generating the risk. Where a risk contains multiple causes and consequences, risk owners are required to collaborate in performing a cause and consequence analysis.

Risk owners are ultimately responsible for the completion and maintenance of risk assessments across their respective risk areas. Risks are measured in terms of the likelihood of occurrence and estimated impact using a standardised scoring model. All evaluations are made from a Group perspective and are relative to Group risk appetite. Guidance tools are in place to ensure Group-wide consistency is achieved across risk assessments.

Existing control measures are documented and assessed within the risk assessment forms in determining residual risk scores. All risk assessments are reviewed by members of the RMC before they are released to the Group Risk Register. The RMC and risk owners can prescribe the implementation of further control measures at the review stage.

The Group Risk Register is the central online repository for documenting, assessing and prioritising risks, and for documenting and prescribing

control measures. The Register forms a significant portion of the Group's risk management process. The Group Risk Register is reviewed on a regular basis by the RMC.

Any necessary changes to the Group Risk Register are made throughout the year and can be prompted by;

- The occurrence of a risk event.
- The identification of new emerging risks or as circumstances of existing emerging risks change.
- Quarterly RMC meetings.
- Internal Audit or regulatory reviews.
- Annual risk owner reassessment.
- Changes in Key Risk Indicator measurements.
- New risk assessments completed within business area teams.

Risk information within the Group Risk Register is analysed and forms the basis for reporting principal risks to the Board and the Audit and Risk Committee for review and approval. A presentation of the Group's principal and emerging risks is made to the Board at least annually or more frequently if warranted by developments. At these presentations, the Board challenges the RMC in their processes and evaluations of the principal and emerging risks identified in the context of the Group's own risk policy, risk appetite and general market developments both within and outside the industry sector. Key Risk Indicators are in place for

## Risk Management Continued

highly ranked individual risks at the residual level, to ensure exposure levels are monitored, flagged to the Board and corrective actions are taken in order to minimise the effects on the groups business.

The annual Board and Audit and Risk Committee agendas include a series of updates from executive risk owners in relation to the Group's principal risks. These comprehensive updates include the history of the risk to date, key mitigating actions and controls, an outline of the residual risk and any future actions planned to address perceived or potential control weaknesses.

### Emerging Risks

Risk monitoring is an ongoing process due to the dynamic nature of the environment in which the Group operates. Three types of emerging risks can arise:

1. New risks that emerge in the Group's external environment. These are identified through the ongoing Group risk identification process.
2. Previously identified risks recorded in the Group Risk Register whose impact on Group activities has changed or evolved, prompting a reassessment.
3. New risks emerging from the internal environment when changes to core processes are made. These are identified when undertaking new projects or engaging with new business partners.

Emerging risks are closely monitored and assessed as their uncertain nature can result in the risks becoming significant within a short timeframe. The emerging risks we see are previously identified risks, evolving in nature. Emerging risks currently under review at the date of this report relate to local governments proposed additional regulations over seafarer working conditions, global security and the related impact on supply chain, increased documentation requirements for travel to and from the UK/ EU, leading to potential

travel delays and disruption. Other significant trends that are a constant in our industry and remain front of mind are the environmental and climate risk driving increased corporate accountability together with technological advancements, GDPR and competition risks.

### Managing Cyber Security

As we deploy progressively more advanced technology to support our business, we face an ever-evolving cyber threat landscape. At ICG, we are acutely aware of our responsibility to protect systems and our customers information from both internal and external interference.

The Board of ICG addresses cybersecurity risk in the context of its general risk management framework, with cyber security continuing to be identified as a key risk. Given its strategic importance to the organisation, the board is informed on cyber security priorities and developments through regular reporting from our Information Technology team. In 2023, reports were received on cyber security and related topics, incorporating managed security service performance, vulnerability management, NISD (EU Network Information Systems Directive) Compliance, Incident response activities, security awareness training and business continuity planning.

Our Information Security Management System (ISMS) is aligned with recognised standards for management of Information Security, ISO 27001 and NIST. Cyber security controls are designed and implemented based on thorough risk assessments and to meet increasing compliance requirements such as PCI-DSS, GDPR and NISD/ NIS2. Cyber security effectiveness measurements are continuously reviewed, and controls improved to mitigate emerging security risks as they develop across the wider industry. Operationally, we manage cyber

security through a blended model of inhouse expertise and the use of best-in-class Managed Security Service Providers (MSSPs), which allows our organisation to benefit from the scale and expertise required to address the evolving threat landscape.

A culture of cyber security awareness is actively promoted at ICG. All employees and contractors requiring the use of our systems must complete regular security training, which highlights and reinforces their own roles in protecting the organisation from phishing and other cyberthreats. Employees have a mandate to report any suspicious activity through established channels. Simulated phishing campaigns and incident reporting statistics are used to gauge the effectiveness of the security awareness training program.

As a nominated critical national infrastructure provider in Ireland, the Group benefits from the interactions with the Irish National Cyber Security and participates in workshops and simulated events. The Group also participates in sectoral forums where interests of the sector are advanced.

### Managing Climate Change Risks

The Group framework for management of climate change identifies the key areas that require attention to enable the development and execution of its climate change risk management strategy. This framework is integrated within the Group's RASP and related risks assessments are released to the Group Risk Register.



#### 1. Climate Change Risk Landscape

The Group identifies climate risks using the same processes as other emerging risks, with additional emphasis on expert climate risk publications and regulatory updates. Climate change risks are unique in how they; affect every individual and organisation, are long term in nature and are highly uncertain in their ultimate progressions and impacts. Due to these considerations, the Group's climate risk register contains the following additional details;

- Risks are assessed over three different time horizons; 0-3 years, 3-10 years and >10 years, with the 0-3-year horizon assessments transferring to the Group Risk Register.
- Impacted stakeholder groups are identified for engagement on associated risks.

- Opportunities are identified for each risk to support strategic positioning and resilience planning.
- Impacts are linked to financial statement areas.

A summary of the Group's climate risks, impacts and opportunities is disclosed in the Task Force on Climate-Related Financial Disclosures.

#### 2. Effective Governance Systems

The Group applies the same risk governance structure to climate change risks as all enterprise risks. The RMC advises the Board on risk appetite, risk management approach and important risk management issues and considerations, which are ultimately approved by the Board or used to facilitate decision making.

The RMC presents to the Board during the year on all important risk management issues, including climate change and ESG risks. The Group's recent Board appointments helps ensure there is adequate Non-Executive Director representation with ESG expertise to challenge the RMC and Executive Management on relevant issues.

The RMC is comprised of management across all areas of the business, including; risk and sustainability, sales, operations, health and safety, planning and finance. Collectively, the RMC has the skills, knowledge and experience to best manage the Group's climate change risks and their wide-ranging impacts. ESG issues are incorporated in the incentive plans of Executive Management and dedicated management roles within the RMC.

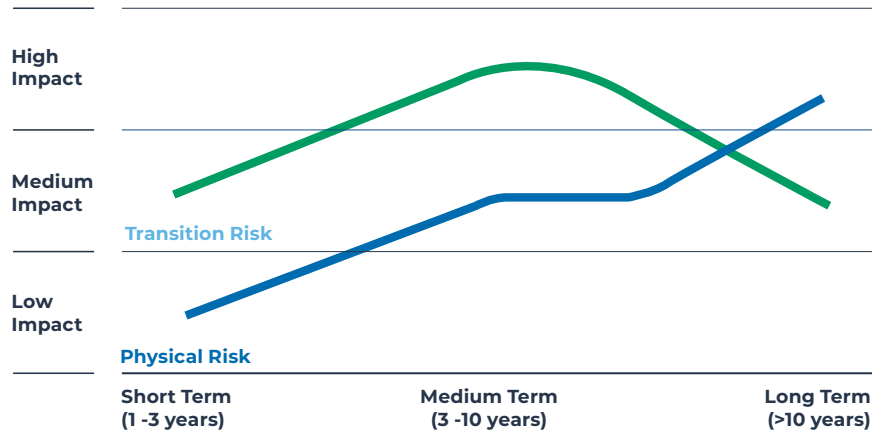
#### 3. Stakeholder Insights and Research

The interests and expectations of stakeholders are important considerations in the Group's climate risk management approach. The Group has undertaken a stakeholder research program to gain insights on ESG issues facing the Group. This helps facilitate an evaluation of our core strategic, operational and compliance processes concerning the environment and climate change expectations. Mapping these insights, helps align stakeholder values to the Group's strategic objectives and core processes.

#### 4. Risk Appetite Setting

Areas of highest stakeholder importance are considered in setting the appetite levels for Board approval. All ESG and climate change risks are then assessed against these levels, and mitigation plans updated to ensure they remain proportionate to the relevant appetite levels.

## Risk Management Continued



### 5. Materiality Assessment over Alternative Horizons

Climate change risks are assessed over three separate horizons; 0-3 years, 3-10 years and >10 years. Current known transition risks are most significant in the short and medium term and are expected to curtail for the third time horizon, as the Group shifts towards a low carbon economy. While physical risks require attention today, significant physical impacts for the Group may only be experienced over the long-term horizon.

Assessments over the long-term horizon are most challenging to calculate but are key to future resilience planning. The Group is exploring further methods to help quantitatively analyse the impact of certain future scenarios.

### 6. Strategic Positioning and Roadmap

Following a full assessment of risks and opportunities over separate time horizons, the Group can assess strategically its current position against long-term goals. This stage allows the Group to identify any changes to its business model necessary for long-term success, with a focus on opportunity management. Further climate change related controls and projects are then agreed.

### 7. Implementing Mitigation and Resilience Plans

Further controls and projects to help address climate change risks are implemented and managed. Current resilience plans, including the Group's Major Incident Response Plans and Disaster Recovery Plans are also reviewed and updated periodically for additional information gathered throughout the process.

### 8. Operationalise Metrics and Targets

Metrics and targets, including carbon intensity and absolute GHG emissions are monitored and reviewed. Relevant Key Risk Indicators are also introduced to monitor high residual risks, in line with the Group's risk management process.

### Significant and Emerging Risk Events

#### Global security and supply chain risk

We see a continued increase in geopolitical risk across the world with events ranging from continued instability in Eastern Europe with Russia's war on Ukraine and growing Middle East tensions with a risk of other countries or political actors getting involved in the Israel/ Hamas conflict.

These events continue to heighten our assessment of supply chain disruption risk, principally due to the risk to trade flows from Southeast Asia and Europe through the Red Sea, increased fuel and insurance prices etc.

### Increasing Regulations Over Seafarer Working Conditions

The UK government and the French government have enacted legislation with the intention to increase the obligations of certain employers in the maritime sector, including the imposition of a minimum wage, over the current international requirements by way of a bilateral agreements. Both laws are not yet in affect as secondary legislation is required to set out the detail of how these laws will be applied. This could lead to an increase in operating costs for the Ferries Division. We are engaging with regional trade bodies to ensure that our position is heard and understood at Governmental and European Union level.

### New Travel documentation requirements.

There are a number of new travel documentation requirements for travel between the UK, the EU Schengen area, and Ireland. These schemes are EU EES (Entry & Exit System), EU ETIAS (European Travel Information and Authorisation System) and the UK Electronic Travel Authorisation (ETA) / Universal Travel Permission (UTP). They will modify the current entry and exits rules for individuals.

These regulations could potentially cause disruption at ports due to increased transaction times at the borders, which may then have an impact on our service. We are engaging with the ports and border authorities to minimise the risk of disruption and ensure readiness to comply with these new regulations.

### Viability assessment



The principal risks identified through the Group's risk processes have been considered by the Directors when preparing the Viability Statement, as part of their assessment of the prospects for the Group.

### Principal Risks and Uncertainties

This table presents the Board's view of the Group's principal risks and uncertainties and is not an exhaustive list of all the risks which may impact the Group. There are additional risks which are not yet considered material, or which are not yet known to the Board, which could become significant in the future. Likewise, some of the current risks may reduce in importance as management actions are implemented or changes in the operating environment occur. The Board will continue to monitor risk in the context of relevant factors such as an increased level of geopolitical and macroeconomic uncertainty, as well as other changes in the external environment, which may create future risks.

Linkage to strategic pillars:









Description and Impact	Risk Treatment	2023 Developments
<b>Strategic Risk - Commercial &amp; Market</b> 		
<p>The Group operates in a highly competitive industry with market risks and opportunities arising from uncertain political and economic landscapes. The Group is at risk of markets not performing in line with expected growth and at risk of loss in market share to competitors, impacting profitability.</p>	<p>The Group undertakes regular assessments of its cost base and performs competitor benchmarking.</p> <p>Direct and indirect competitor activity and market performance is closely monitored which allows the Group to respond swiftly.</p> <p>The Group focuses on ensuring a safe, reliable and high-quality service is provided to customers in order to maintain and strengthen alliances.</p>	<p>There continues to be significant competitive pressures within our markets due to increased inputs costs and competitor activity included new capacity on routes between Ireland and Uk/Continental Europe.</p> <p>In our container shipping business we adapted the number of ships on hire from 6 - 5 responding to demand trends.</p>
<b>Strategic Risk - Economic and Political</b> 		
<p>Economic and political factors including instability and changes to laws on travel and trade could adversely impact the Group's activities and demand for its services.</p> <p>Geopolitical risks, including war risks could have significant Global impacts, including impacts to Group operations.</p>	<p>The Group liaises with various associations and governmental bodies to share views on proposed legislative changes.</p> <p>Micro and macroeconomic activity is closely monitored to ensure Group decision making is informed and timely.</p>	<p>Geopolitical risk continues to be monitored closely, including the instability in eastern Europe driven by the illegal invasion of Ukraine by Russia, greater instability in Middle East with Israel's war with Hamas and the potential for the conflict to spread to other areas, including the Red Sea trade lanes.</p> <p>These have all had a significant impact on the wider European economy especially in the areas of fuel and other supply chain inflation.</p> <p>The freight market continues to work through the effect of Brexit and the ongoing changes to administrative requirements on movements of passengers and cargo between the UK and Europe.</p>



# Risk Management

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Description and Impact	Risk Treatment	2023 Developments
<b>Operational Risk - Business Continuity</b> 		
<p>The Group's operations are exposed to the risk of fire, flood, storms, vessel incidents and loss of critical supplies caused by accident or by natural disaster.</p> <p>Minor disruptions can impact revenues while major disruptive events can result in the loss of critical infrastructure causing significant financial loss and reputational damage.</p>	<p>The Group places strategic importance on investment in quality assets and safety, including vessels suitable for challenging sailing conditions and experienced crews and operations teams.</p> <p>The Group has detailed, coordinated and rehearsed business continuity plans containing crisis management and disaster recovery components to respond to major incidents at land or at sea and ensure affected operations can be resumed promptly and safely.</p>	<p>There were no significant disruptions which led to significantly curtailed operations during the year.</p>
<b>Operational Risk - Health and Safety</b> 		
<p>The Group is inherently exposed to the risk of incidents, including; workplace accidents, vessel collisions and damages, hazardous cargo and incidents involving passengers.</p> <p>There is also a risk of outbreak of contagious illness among staff, crews and customers.</p> <p>These events could result in loss of life, serious personal injury or illness, asset damage and reputational impact concerning safety.</p>	<p>The Group and its service providers adhere to defined operating safety and quality policies and procedures. All sites are regularly inspected by internal second line functions and external regulatory bodies. Emergency procedures and safety training are conducted regularly.</p> <p>Hazardous cargoes are managed in accordance with international maritime regulations.</p> <p>Group vessels, offices and facilities are thoroughly and frequently sanitised. World Health Organisation (WHO) and governmental guidance and instructions are followed.</p>	<p>Health and safety metrics for the year are disclosed in the Employee Health and safety tables.</p>
<b>Operational Risk - Operational Compliance</b> 		
<p>The Group's activities are governed by a range of IMO, flag state, port state, EU and national governmental regulations. There is a risk that instances of non-compliance may occur that causes disruption, reputational damage or financial penalties.</p>	<p>Ongoing training is provided to operations staff and contractors in line with regulatory requirements.</p> <p>New regulations are discussed and assessed at management meetings, together with measures to ensure compliance.</p> <p>The Group's vessels and port operations are subject to regular inspections and audits from internal second line functions and external bodies.</p>	<p>The Group continues to monitor new regulatory developments at the IMO and the EU and liaise with regional chambers of shipping, shipowners' associations and other industry representatives as further information is announced. Compliance risks related to reducing emissions are managed within the Group's climate change risk framework.</p>







Description and Impact	Risk Treatment	2023 Developments
<b>Operational Risk - Environmental Protection</b> 		
<p>The Group is exposed to long-term physical effects of climate change and to near and long-term transition risks associated with the movement towards a low carbon economy. These risks and impacts are detailed further in the Task Force on Climate-Related Financial Disclosures.</p> <p>There is also a risk of spillages or incidents causing pollution and discharge to the sea.</p>	<p>Physical and transition climate change risks are managed within the Group's climate change risk framework.</p> <p>The Group is employing a range of technical and operational measures to achieve its GHG reduction targets. Refer to Sustainability and ESG for further details.</p> <p>The Group and its service providers adhere to defined operating safety and quality policies and procedures. All sites are regularly inspected by internal second line functions and external regulatory bodies. Emergency procedures and safety training are conducted regularly. Hazardous cargoes are managed in accordance with international maritime regulations.</p>	<p>The Group continues to place significant focus on enhancing its approach to ESG and sustainability. Refer to the Sustainability section for further information on activities and developments during the year.</p>
<b>Operational Risk - Human Capital</b> 		
<p>There is a risk of failure to attract qualified and talented individuals and additionally a risk of losing key personnel. Staff could become unmotivated or dissatisfied with the working environment. These risks can ultimately lead to a poor standard of customer service and decision making, affecting the Group's market position, reputation and stakeholder relationships.</p>	<p>Pay and conditions are reviewed and benchmarked to ensure the Group remains competitive.</p> <p>ICG is an equal opportunities employer and seeks a diverse workforce to promote a strong and accepting culture and to help make informed decisions.</p> <p>Staff are encouraged and supported in their pursuits of further education and career advancement.</p> <p>Long-term incentive plans are in place to retain and motivate key management personnel.</p>	<p>Our employee numbers have been stable during the year in line with expectations.</p>
<b>IT Systems and Cyber Risk - Information Security and Cyber Threats</b> 		
<p>The Group is heavily reliant on its IT systems to support business activities. These systems are susceptible to data breaches and cyber-attacks that can result in disruption, heavy fines and reputational damage.</p>	<p>The Group employs a suite of physical access controls and technical controls to prevent, detect, mitigate and remediate malicious threats and unusual activity. Such controls include rehearsals for major cyber incidents, vulnerability management processes and security awareness training for staff and key contractors.</p>	<p>Cyber-attacks continue to grow in volume and sophistication and have particularly intensified in recent years. We have seen attacks by groups, linked or supportive of foreign governments during the year.</p> <p>There were no significant disruptions to our services during the year. The Group remains vigilant and ensure all efforts to protect its systems are made.</p> <p>For an overview of the Group's cyber security risk management process, see the Managing Cyber Security section.</p>



# Risk Management

## Continued

Description and Impact	Risk Treatment	2023 Developments
<b>Financial Risk - Financial Loss</b> 		
<p>The Group is at risk of losses caused by ineffective or inefficient financial policies or practices, such as; inadequate budgeting and planning, insurance provisioning, project management or credit control techniques.</p>	<p>The Group's financial management activities are performed by experienced and knowledgeable personnel. Regular internal management reporting ensures negative variances and trends are identified timely and acted upon.</p> <p>Close relations with insurance brokers are maintained and emerging risks are considered when assessing coverage.</p> <p>Major projects require pre-approval of the Board. Due diligence procedures are carried out for project contractors and new commercial customers while ongoing performance management of projects and debtors are in place.</p>	<p>We continue to invest and improve our analytics offerings to our executive management to monitor key operational statistics timely. This allows us to act swiftly and decisively to address any building trends against established benchmarks.</p>
<b>Financial Risk - Volatility</b> 		
<p>The Group is exposed to adverse fluctuations in fuel prices and exchange rates which can reduce revenues, increase cost base and reduce overall profitability.</p>	<p>Group policy has been to purchase commodities in the spot markets and remain unhedged. The Group operates a dynamic surcharge mechanism with its freight customers which allows prearranged price adjustments in line with Euro fuel costs to help mitigate US Dollar exposure arising from fuel purchases. In the passenger sector, in addition to fixed environmental surcharges, changes in bunker costs are included in the ticket price to the extent that market conditions will allow.</p> <p>The Group employs a matching policy to mitigate exposure to Sterling. Decreases in translation of Sterling revenues to Euro are largely offset against corresponding decreases in translation of Sterling costs.</p>	<p>Fuel prices continue to be volatile in 2023, but overall have reduced from the highs of 2022.</p> <p>The Group's magnitude for exposure to unfavourable Sterling movements increased during the year, following increased trade on the Dover-Calais route.</p>

Description and Impact	Risk Treatment	2023 Developments
<b>Financial Risk - Retirement Benefit Scheme</b> 		
<p>The Group's pension liabilities are exposed to risks arising from changes in interest rates, inflation, demographics and market values of the underlying investments, resulting in increased scheme obligations or decreased scheme assets.</p>	<p>A portion of the Group's defined benefit risks are transferred to a third-party insurance company.</p> <p>All actuarial assumptions are substantiated and challenged where necessary.</p> <p>Regular communication is maintained with the scheme investment managers to monitor performance relative to agreed benchmarks.</p>	<p>In 2023, the Group continued its de-risking initiatives and active investment management.</p>
<b>Financial Risk - Fraud</b>   		
<p>A significant volume of transactions is processed throughout the course of the year. These include a large amount of payment exchanges in the booking process, on board passenger vessels and at port ticket desks. This level of activity inherently carries a risk of fraud through the processing of improper payments or misappropriation of cash or assets.</p> <p>Any instance of fraud affecting ICG could result in financial loss, reputational and cultural damage.</p>	<p>Improper payments are prevented by a segregation of duties within the payment set-up, payment approval and accounts posting processes. Further training and procedures are in place to ensure any requested changes to vendor payments are validated.</p> <p>Daily reconciliations are performed at cash processing locations. All cash counts require supervisor oversight and CCTV cameras are installed to deter and capture any inappropriate behaviour.</p> <p>Internal audit procedures are designed with consideration for the scope of fraud, where relevant.</p>	<p>The Group is not aware of any confirmed or suspected instances of material fraud during the year.</p> <p>The Group has a Protected Disclosure (Whistleblowing) Policy to encourage employees or any person who works or has worked for the Group to make a disclosure in respect of significant matters including instances of fraud. This policy is available on our website.</p>
<b>Financial Risk - Financial Compliance</b>  		
<p>As a public listed company with operations in different jurisdictions, the Group must comply with multiple financial and administrative regulations. Any policy changes or instances of non-compliance could result in financial loss, penalties or reputational damage.</p>	<p>The Group relies on its professional staff to ensure necessary filings are timely, complete and accurate.</p> <p>Third party experts are engaged when required to advise on complex matters.</p> <p>The Group engages productively with Irish tax authorities through the Co-Operative Compliance Framework.</p> <p>Additional assurance is also gained from the work of the Group's external auditors.</p>	<p>The Group is monitoring developments in regulations particularly around whether BEP's Pillar 2 may affect the group in future periods, through increased tax obligations.</p> <p>The Group is also monitoring and assessing the financial and administrative impact of the EU emission trading scheme and a similar scheme proposed by the United Kingdom. We have put in place procedures to pass on the additional cost to our customers from 2024.</p>