

Human Trafficking and Slavery Statement



This statement constitutes the position of Irish Continental Group plc (ICG) in relation to modern slavery and human trafficking and is made in respect of the financial year ending 31st December 2018. This statement applies to ICG and its subsidiaries.

The Group

ICG is incorporated and based in Ireland and operates maritime transport and related services. Through its subsidiaries it operates shipping services into the United Kingdom from Ireland and Continental Europe and provides port and agency services. A listing of operating subsidiaries and a description of their activities are set out below.

Company	Incorporated	Activity	Geographic Area of Activities
Irish Continental Group plc	Ireland	Ropax shipping services and stevedoring services	Ireland, Continental Europe and United Kingdom
Eucon Shipping and Transport Limited	Ireland	Container Shipping Services	Ireland, Continental Europe and United Kingdom
Contarga Limited	Ireland	Vessel time chartering	Ireland and Continental Europe
Belfast Container Terminal (BCT) Limited	United Kingdom	Stevedoring services	United Kingdom
Irish Ferries (UK) Limited	United Kingdom	Booking and port agency services	United Kingdom
Irish Ferries Services Limited	Ireland	Employment agency	Ireland
Irish Ferries Services (UK) Limited	United Kingdom	Employment agency	United Kingdom

Business Model

At 31 December 2018, ICG employees were based across its locations in Ireland, continental Europe and the United Kingdom. ICG operates a mainly outsourced business model so the key risk for modern slavery is within ICG's outsourced supply chain. Key contracts in the Group's supply chain include the appointment of third party contractors for the crewing and technical management of its owned vessels and the manning of port stevedoring operations at ports served in Ireland, continental Europe and the United Kingdom. ICG also charters-in vessels on a time charter basis (i.e. fully crewed) from third party owners for use in its operations.

Supply Chain Management

ICG imposes strict obligations on the entity responsible for the technical and crewing management onboard its ships, the applicable contractors it employs and its management teams to comply with all applicable laws, including those relating to labour and employment practises. ICG requires a due diligence process to be conducted prior to the appointment of a contractor together with in-contract reviews

Within its day-to-day operations ICG has in place a range of measures to help ensure modern slavery and human trafficking are not taking place in its business or its supply chains. We set out some of these measures below;

- In addition to general observation for unusual behaviour in our ports and onboard our vessels, which is standard procedure across the industry, ICG provides guidance to employees to support immigration and border agency initiatives to reduce human trafficking. Awareness of this issue is promulgated across all group businesses.
- ICG is committed to working continually with other companies and organisations to share knowledge, learning and best practise and co-operates with a series of law-enforcement projects that help to combat human trafficking and modern slavery.
- We regularly update management and committees on modern slavery so that directors and key individuals understand their role and accountability for eradicating modern slavery from our business and supply chains.

ICG continues to actively monitor its success in preventing modern slavery and human trafficking by reference to reports and alerts from staff, the public and communication with law-enforcement agencies.

This Modern Slavery and Human Trafficking Statement for the financial year ending 31st December 2018 has been approved by the board of directors of ICG on 18th January 2019.

Eamonn Rothwell
Chief Executive Officer
Irish Continental Group plc.
Date: 18th January 2019