

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 Northern Marine Group Ltd and its subsidiary companies to prevent Slavery and Human Trafficking in its business and supply chains for the financial year ending 31st December 2018.

This statement covers the following subsidiaries of Northern Marine Group Ltd:

- Alba Travel Ltd
- Beaver Travel Ltd
- Aurora Digital Solutions Ltd
- Clyde Healthcare Ltd
- Clyde Marine Training Ltd
- Clyde Training Solutions Ltd
- Clyde Travel Ltd
- Clyde Uniforms Ltd
- The Clyde Group Ltd
- Northern Marine Ltd
- Northern Marine Management Ltd
- Northern Marine Offshore
- Northern Marine Manning Services Ltd
- Stena Marine Far East Ltd
- Tritec Marine Ltd

Our Position

Northern Marine conducts its operations ethically in terms of all business dealings and relationships. Northern Marine is part of the larger Stena AB Group and its reputation is built on its core values of Care, Innovation and Performance.

Northern Marine has a zero tolerance approach to Modern Slavery and Human Trafficking and the company recognises and acknowledges its responsibility to address and to mitigate the risk of such activities within its global operations.

Organisational Structure and Supply Chain

Northern Marine is a prominent provider of ship management and marine services to the commercial shipping and energy sectors. We also through subsidiary companies provide business and leisure travel services along with human resource services for the healthcare sector. Our business is global.

Northern Marine obtains a variety of goods and services from global suppliers. Our aim is always to maintain a competitive, reliable and sustainable supply chain wherever we operate. In dealing with our suppliers, Northern Marine endeavours to always act in an ethical and socially responsible manner.

Relevant Policies and Actions

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

Anti-Slavery Policy: This policy confirms our zero tolerance approach to Modern Slavery and confirms that the Company would terminate its relationships with individuals or organisations working on our behalf if they are found to be in breach of this policy.

Ethical Policy: This policy commits the Company to the practice responsible corporate behaviour. It is a wide ranging policy that seeks to protect and promote the human rights and basic freedoms of all employees and agents whose work contributes to the success of the Company.

Code of Conduct: The Code of Conduct has been adopted by all Stena AB Group Companies and makes clear the actions and behaviours expected by employees when representing the Company

Whistleblowing Policy: The Company encourages all its employees, customers and other business partners to report any concerns related to its direct activities or its supply chain.

Northern Marine'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 (MLC) 2006 standards for conditions of employment.

Our Supplier Questionnaire is committed to ensuring that suppliers adhere to the highest standard of ethics and are expected to demonstrate that they provide safe working conditions and act within the law in their use of labour.

These procedures are subject to regular internal and external audit.

Northern Marine employees have completed e-learning in relation to the Code of Conduct and our Anti-Bribery and Corruption Policy. Both policies outline the expectation that its employees will conduct business with the highest level of integrity and respect for the interests of those with whom it has relationships.

Responsibility

The Northern Marine Group Board has overall responsibility for ensuring legal and ethical obligations relating to Modern 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 Northern Marine Group Board of Directors endorses this policy statement and is fully committed to its implementation.



Philip W.B. Fullerton
Managing Director
Date: 31st March 2019

