



MODERN SLAVERY ACT STATEMENT

FRINSA UK LIMITED

2020

Frinsa UK Ltd.

DECLARATION REGARDING MODERN SLAVERY¹ CORRESPONDING TO THE YEAR 2020

Version 1. Date: August 2021

Frinsa Group. Who are we?

Frinsa del Noroeste, S.A (Frinsa Group), is one of the largest processors of canned seafood products in Europe and has been operating for more than half a century.

Our location, in the northwest of Spain, along with the commitment of our shareholders and employees, has been key in defining us as a company and its values.

Frinsa UK Ltd (Frinsa UK) is a direct subsidiary of Frinsa Group that services clients in the UK, Ireland, and Scandinavian markets.



Through our way of working, we promote our core values. As fundamental pillars of our Group, we believe in the respecting and defending of human rights in our entire supply chain; doing business from a perspective of a socially responsible company and one oriented towards manufacturing products that meet the quality standards expected by our customers and consumers.

Our commitments with the quality of the products and with the sustainability of the resources and the environment, established many years ago already, also include the people that work in this wide and diverse industry.

Throughout our global supply chain, for example, modern European and Asian fishing companies are involved; also, fishermen in near and far coastal countries that still use artisanal fishing methods, and large and small processors in Europe, Asia, and Latin America.

In our philosophy we reflect the importance of the human factor in this chain, and we have the understanding that, for us, talking of ethical supply or of responsible sourcing also means talking about the respect towards the people that make up this chain and their inherent rights.

¹ This declaration covers the year 2020 and it is made in compliance with the "Modern Slavery Act 2015" (UK).



Main Production Site and HQ in Ribeira, Spain



Production Site in Portugal



13x Commercial & Procurement Offices



Strategic Partners



1500+ Staff



3.5M Cans Daily

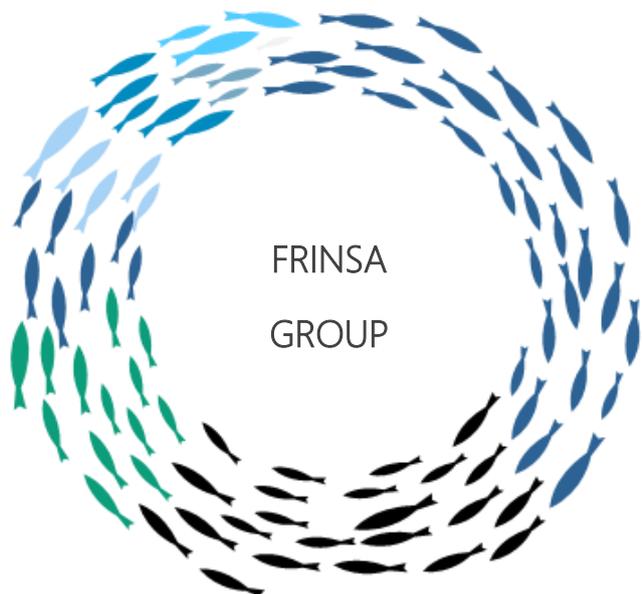


2,600 SKUs



90 Different Brands
320 Different Formats

Spain	36%
France / Benelux	26%
Italy	11%
Germany / Austria / CH	8%
UK / IRE / Scandinavia	7%
Portugal	7%
USA	2%
East Europe / Balkans	2%



Frinsa UK Ltd.'s Modern Slavery Declaration 2020

Various pillars comprise the Corporate Social Responsibility Policy of Frinsa UK.

One of these fundamental pillars is the commitment of Frinsa UK to eradicate modern slavery in any of its forms and throughout its supply chain, adopting a policy of zero tolerance.

As a company, we are committed to act in an ethical and wholesome manner, socially responsible in our business relationships throughout our supply chain.

And just as we are committed, at Frinsa UK we require that these same commitments be observed by all those that intervene, in one form or another, in our commercial relations, represent us or act in our name.

It is a great challenge for society to eradicate modern slavery. We believe that it is through the cooperation of everyone that human dignity becomes the basic norm of coexistence.

This implies the commitment of governments, the business world, and the people.

At Frinsa UK, in accordance with initiatives and standards promulgated in important international forums, such as those established by the **ILO (International Labour Organisation)** or being compliant with specific laws like the **Modern Slavery Act 2015 (UK)**, we perform diverse actions to identify and eliminate any possible act of slavery or forced labour in our supply chain.

In effect, we publish this Modern Slavery Declaration 2020 (or 2020-2021) in compliance with Part 6, Section 54, Point (1) of the Modern Slavery Act 2015 (UK), thus facilitating information about our commercial activities, our measures, and our commitments to help to mitigate this social problem.

1. Structure and Supply Chain

Frinsa UK is a leading supplier of ambient seafood, established in 2015 as a direct subsidiary of Frinsa Group. The key focus of the business is the supply of canned tuna, but our product range also includes canned salmon and canned sardines, amongst others.

We operate across the UK, Ireland, and Scandinavia markets, with our products being sold under many major supermarkets' own labels, as well as our own brands: The Nice Fisherman, Frinsa La Conservera and Minerva.

Frinsa UK sources internationally across several continents, that includes Europe, from where our parent company Frinsa Group operates out of two manufacturing sites, one in Spain and another in Portugal.

The company also has key strategic partnerships in place with third-party factories in Ecuador, Ghana, Papua New Guinea, Morocco, and Alaska. We work closely with all our suppliers to build strong and lasting relationships. This enables us to drive continuous improvement in ethical standards across our supply chains.

These relationships with our suppliers are based on trust, strengthened through the years. The references that our suppliers bring us regarding their respect and observance of the Law, of our Code of Conduct for

Suppliers and of the compliance with, and respect for, all the rights of workers are essential when initiating business relationships.

The participation of suppliers, current or potential, in socially responsible initiatives is a welcomed and positive attitude for them to become a part of our supply chain.

For its part, Frinsa UK performs its own verifications, be they internally originated or undertaken by independent third parties, with the intention of verifying compliance with the commitments adopted by the suppliers.

2. Policies in relation to slavery and human trafficking

Frinsa UK, as a subsidiary of Frinsa Group, participates in, and is subject to, ethical, social, and environmental policies that govern Frinsa Group and manage the sourcing of our finished products and raw materials, as well as our actions with the company employees and those of other companies with which we relate, and with all our stakeholders.

These governance norms and policies have helped us to define our business philosophy, linked to a socially responsible business plan, to make healthy products of good quality, taking care of the natural resources available to us, and protecting the employees and the persons that make up this complex network.

3. Due diligence processes in relation to slavery and human trafficking. Risk assessment and management

Our philosophy with regards to the suppliers is based on a mutual cooperation for the common good, but we cannot dismiss that, due to our global wide supply chain, we must have concrete methods of verification and control.

Performing audits and checks on our suppliers regarding their social ethics and their respect for human rights, sustainability and working methods, or verifying their compliance with protocols and norms, are actions that we understand as necessary, and that we perform both with the participation of independent organisations and entities, and through internal procedures that we have been implementing.

The products that Frinsa UK trades with are divided in two large groups: 1) those manufactured in the plants owned by Frinsa Group, buying the raw materials to process in Frinsa plants; 2) those products already finished, manufactured in other plants owned by other suppliers and that Frinsa UK commercialises.

In both cases, we have implemented prior procedures to evaluate and approve the suppliers, procedures which must be complied with so that the suppliers can become a part of the Frinsa UK supply chain.

In this manner, before establishing a supply contract, or if one already existed before implementing this procedure, as a posterior and necessary condition for the continuation of the contract, our suppliers are subjected to an **initial process of self-evaluation** by means of specifically prepared questionnaires, with a special focus on social, ethical, labour, and environmental issues. From the results of the self-assessment, we can propose to the supplier the corrections and improvements deemed necessary to guarantee a

social and ethical responsibility in our supply chain, and, very particularly, an absolute abolition of every possible type of modern slavery.

The process of self-evaluation may be substituted by an ethical-social audit performed by an independent auditing entity under the initiative of our suppliers.

Among the risk areas to evaluate we include labour safety, working hours, salaries and contracts, management and control systems, employment of minors and underage labour, labour conflicts and grievances, and environmental issues.

Additional to this self-evaluation process, and as an indispensable condition for all suppliers to form part of our supply chain, we request of them **to adhere to the Frinsa Code of Conduct for Suppliers**.

The main issues addressed by Frinsa Group's Code of Conduct for Suppliers are:

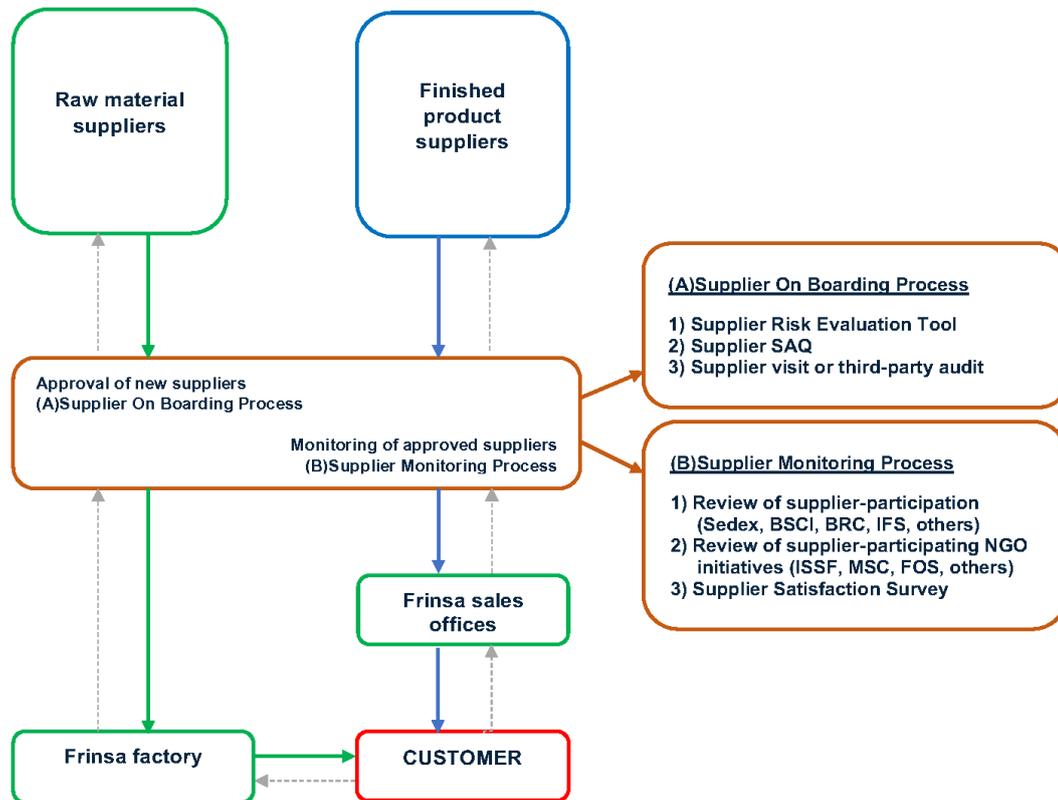
- the prohibition of forced labour and child labour
- the respect of underage persons
- non-discrimination and equal treatment of persons
- respect for freedom of association and collective bargaining
- the provision of safe and hygienic working conditions
- fair and just remuneration and benefits
- adequate working hours in the legal framework
- transparent and responsible business ethics, which include full compliance with the law, confidentiality and no corruption or bribery.
- environmental protection, sustainability of the resources and respect for local populations

Based on the results obtained in the mentioned self-evaluation, or the evaluation through an independent entity, as well as considering other possible risk factors, such as the country of origin of the supplier, the weight of the supplied product in our production process, legislative compliance, the existence of alternative suppliers, communication with the supplier, etc., we evaluate our **Risk Map and Supplier Auditing**.

During visits to the suppliers, we can also **monitor** them to observe their development and confirm the implementation of measures that have been agreed.

In the framework of monitorisation, we have planned for 2022 to implement with our suppliers **Satisfaction Surveys and Dialogues**. These specific questionnaires and open-text surveys will consider their opinions and suggestions for two-way improvement, their level of satisfaction in communications with Frinsa Group, and their possible preoccupations or issues to be addressed together.

The current supplier approval process is described in the following flowchart:



To give more depth to all these actions, Frinsa Group is part of **Amfori** (www.amfori.org) and its **Business Social Compliance Initiative (BSCI)**, as well as of the **Supplier Ethical Data Exchange (SEDEX)**, www.sedex.com) and its audit **SMETA (Sedex Members Ethical Trade Audit)**.

Besides our own protocols, to perform the verification actions we also make use of the tools created by these and other organisations. Among other initiatives, the members have the possibility to program supplier audits with a specific end, these are done by independent auditing entities.

At the moment of evaluating the risk by country, for example, we utilize the "[Due Diligence Tool](#)", developed by Amfori and available to its members.

It is, in essence, a work methodology that allows the forming of synergies between members that share suppliers. The platform provides access to a common database that provides ethical supply chain performance information, resulting in increased control up the supply chain.

Frinsa UK has adopted the following commitments:

- meet the 11 principles that form the [Amfori BSCI Code of Conduct](#).
- create the incentives so that a high percentage* of its suppliers are participating in Sustainability/Corporate Social Responsibility recognized programs, such as Amfori BSCI, Sedex SMETA, SA8000, or others equivalent.

*We are proud to say that for this declaration of the year 2020, the percentage of Frinsa UK's suppliers that participate in one of these Sustainability or Social Responsibility programs (such as Amfori BSCI, Sedex SMETA, SA8000, or others equivalent) is 100%.

The participation in these programs demonstrates transparency, creates a bond of trust, and contributes to make sure that the efforts are being made towards a continuous improvement of the working conditions.

In the case that a potential supplier is not yet in one of these programs, we encourage this new business partner to make the commitment to join one of the programs. During the period of preparation, we work with the supplier to make sure that the end result is a success.

Additionally, Frinsa Group performs **regular visits to the suppliers** and their production sites, which helps us to identify areas for improvement in their procedures and ways of working; allows us to see with more clarity the social environment of the countries where they are located; check the situation of the workers and employees, and also detect any possible incidence of modern slavery. And with all this we are able to educate our suppliers in the areas that need improving and set corrective actions.

In this line, it is the objective of Frinsa UK for 2021 to **impart training to personnel** that visits the suppliers' premises, so these personnel can have the sufficient knowledge and capacity to detect possible incidences of modern slavery, violations of human rights or working manners that are not compatible with an ethical or social responsibility.

Our objective is to establish a permanent bond with our suppliers, and these suppliers with theirs, to create a solid chain where all participants feel that their actions contribute to the improvement of the working conditions, wherever they are in the chain.



As a means to give impulse to the ethical, transparent, and sustainable trade that is promoted by **Amfori** (www.amfori.org), Frinsa Group also became part of this organisation, thus joining more than 2.400 importers, distributors and other organisations and associations in more than 40 countries that already participate in this program.

Within the objectives of Amfori we can cite, for example:

- give impulse to fair and sustainable trade worldwide.
- achieve that the organisations work in favour of human development throughout the supply chain.
- achieve a responsible use of the natural resources.



Frinsa Group is also part of this organisation. In this manner, we give even more coverage to our suppliers, supporting them so that, through Sedex or Amfori BSCI, they can more easily become part of our supplier folder.

4. Effective actions taken to address modern slavery

Frinsa UK has recently implemented its Risk Management and Supplier Auditing mechanisms, so that, at the time of issuing this present declaration, it has not identified any act, or being suspect of constituting, a situation of modern slavery, not having, therefore, established any concrete corrective actions regarding this.

Nevertheless, and to reinforce the position and commitment of Frinsa UK in the abolition of modern slavery, Frinsa UK has set a series of objectives that make up a roadmap, to develop between 2021-2022, what we call "active improvements". Among them, we mention the following:

<p>Increase the number of suppliers that participate in ethical-social programs.</p>	<p>Frinsa UK's objective is that a high a percentage* of its suppliers participate in an Amfori BSCI, Sedex SMETA, SA8000, or another similar program.</p> <p>* For the year 2020, the percentage of Frinsa UK suppliers in one of these programs is 100%.</p> <p>This helps Frinsa UK to have more supply options available with sufficient guarantees, and the workers to guarantee their adequate working conditions.</p>
<p>Continue to strengthen the relationships with suppliers for long-term understanding in an ever clearer ethical direction.</p>	<p>The objective is to promote continuous improvement. Through this, along with the ethically responsible attitude of our suppliers and us, we can extend this socially conscious manner of operating along our supply chain and be more and more transparent with each new measure adopted.</p>
<p>Evaluate, and where appropriate, participate in more organisations and forums linked to the rights of workers and to measures to eliminate modern slavery.</p>	<p>It is important to be seen and heard in meetings and events relative to these issues. This sends a clear message of our attitude of intolerance. Clear actions are the most effective.</p>
<p>Establish tools (surveys, questionnaires et al.) for the anonymous dialogue with the workers, especially those in zones of greater risk.</p>	<p>The idea is to gather information to create a database for the analysis and evolvement of the companies that supply us, and to be able to extend this initiative to all zones and regions where we operate. This measure will help us to detect possible situations of modern slavery risks or of other violations of human rights.</p>

<p>Increase the internal training, in particular of the procurement team.</p>	<p>Since it is the procurement team that has the closest relationship with the suppliers, it is our intention to use this direct bond to examine more deeply the status of the labour relations and verify that the workers maintain their full rights.</p>
<p>Update our ethical-social, sustainability and environmental policies to reflect the important changes that take place in our industry to make the policies more ambitious.</p>	<p>Considering the rapid evolution that is taking place in the social environment, it is necessary to update, regularly, all our policies. These are very serious issues that affect persons, so it is a moral obligation to always be at the forefront of change.</p>

The CSR team, fully dedicated to guarantee the compliance of our policies, including the absence of modern slavery in our supply chain, will continue its efforts to make sure that all the workers that have some connection, directly or indirectly, to us can have a fair salary, work in safe conditions and dignified environments, and can think of a long and prosperous future.

5. Training on modern slavery and trafficking

The Frinsa Group CSR team also works to develop, establish, and monitor the social-ethical policies of the company along the supply chain. This team maintains close relationships with the subsidiaries, the suppliers, and the clients to make sure that there is full understanding of our philosophy and that the commitment to it is maintained.

In collaboration with other departments of the company (Human Resources, for example) training is given to the workers so that they know and understand this philosophy, and for them to base their daily activities on it.

Of special importance to us is the formation of our procurement personnel regarding awareness of possible forms or incidences of modern slavery, or of other possible violations of human rights, as well as the reporting mechanisms available within Frinsa Group. See, for example, the [Modern Slavery Training Guide](#).

One aspect of our company philosophy is the understanding that the business relationships are longer and more stable if both sides feel comfortable in the commercial process. We believe that things function better if there is equity.

We also know, unfortunately, that not all people enjoy equivalent social and labour conditions.

Therefore, in order to promote equality, which is necessary for the good development of persons and the improvement of communities, we instil our workers to report any situation of grievance.

Those that, in particular, work in departments that have relationships with other participants in the supply chain receive instruction to fortify these relationships, but also, to keep vigilant to detect possible cases of abuses in vessels, factories, work environments, etc.



The development and implementation of norms and actions with our suppliers, even if they originate from the Management of the company, are handled, on the day-to-day, by the CSR team of Frinsa Group, led by the CSR Manager. It is the team's mission to work with its company colleagues and with the suppliers on all facets of CSR issues, making company transparency, ethical business practices and fair and just treatment of all persons its priority.

In summary, internal awareness implies training our employees first so that they understand well how they must interact with others. This will make it easier to identify and rectify areas with deficiencies. We believe that, if we are going to require an ethical attitude and a social responsibility from others, we must require these from ourselves first. Just as giving adequate training to all our management and workers regarding the possible risks, policies, and minimum standards relative to modern slavery, human trafficking and forced labour.

6. Cooperation with organisations

The participation in external forums is equally important to, for example, keeping ourselves informed of new developments, or to exert pressure on more bureaucratic and slow entities in establishing legislation referring to modern slavery or the rights of the workers.

Adding to our relationship with organisations like BSCI and SEDEX, we are also members of, or collaborators with, among others, the **International Seafood Sustainability Foundation (ISSF)**, the **Marine Stewardship Council (MSC)** or the **Sustainable Fisheries Partnership (SFP)**.



Our participation in these organisations try to promote attitudes and activities in favour of the sustainability and health of the resources, as well as fomenting an ethical and transparent attitude among the participants that make up the supply chain. It is relevant to mention that organisations like ISSF, for example, are already extending their scope of action further afield than the sustainability of the resources, establishing measures to tackle possible deficiencies in ethical and social responsibility of the members, and of those with whom these do business. See, for instance, the recent conservation measure adopted regarding social and labour standards: (<https://iss-foundation.org/what-we-do/verification/conservation-measures-commitments/social-and-labour-standards-9-1-public-policy-on-social-and-labour-standards/>).

Other policies of Frinsa Group

Please see a summary of our [quality, environmental and social responsibility policy](#).

Also, we have the [Code of Conduct for Suppliers](#) which is of full compliance, without exceptions, for all our suppliers.

We also monitor and make regular visits to our suppliers, as indicated in our [own Code of Conduct](#). These controls serve, among others, to maintain updated audits of the processes and procedures, and the renewals of the suppliers' certifications.

In reference to the sustainability of marine resources, we have established our [Sustainability Policy](#).

Since at Frinsa Group we perform our business in an ethical and transparent manner, we are in the process of developing an [Anti-Corruption and Anti-Bribery Policy](#).

Conclusion

In 2020 we have not detected any incidence of slavery in our direct supply chain.

Utilising four fundamental points: a strong **internal conscience**; **analysis, evaluation**, and **risk management** actions; **participation** in **forums** and **external organisations**; and continuous **active improvements**, the CSR team at Frinsa Group, in close collaboration with other departments, works to make sure that the differences and deficiencies that exist in our supply chain continue to be minimised and to guarantee that there is no form of modern slavery in all our supply chain.

It is not a static or finite task. It is a matter of continuous improvement, which means working closely with third parties, independent entities, our clients, and suppliers to ensure we are developing our business in a socially responsible way.

We understand that detecting and preventing modern slavery in any link of the supply chain is a responsibility for all involved. Therefore, we foment the vigilance and reporting of any situation, in any place where Frinsa Group is present, that may be suspect of any slavery activity, privation of liberties or inhumane treatment.

The detection of non-compliance of the fundamental rights of workers by any of our suppliers carries with it the immediate termination of business relations.

Name: Jorge Carregal Varela

Position: Frinsa CEO

Signature:

A handwritten signature in blue ink, consisting of stylized, overlapping letters that appear to be 'JCV'.

Date: 30 August 2021