

# Frinsa UK Limited

## MODERN SLAVERY STATEMENT YEAR 2024

March 2025

## Frinsa UK Limited

### MODERN SLAVERY STATEMENT<sup>1</sup> CORRESPONDING TO THE YEAR 2024

#### Frinsa Group

Grupo Frinsa (“Frinsa Group”) is one of Europe’s major processors of canned seafood products. The company is in operation since 1963.

Grupo Frinsa is a reference point in the seafood processing and canning industry in the Galicia region of Spain, shipping its production to market countries in the European Union and to other nations beyond Europe.

Frinsa UK Limited (“Frinsa UK”) is the UK-based subsidiary of Frinsa Group, servicing the clients of the United Kingdom, Ireland, and the Scandinavian countries.

During more than sixty years, Frinsa has developed, established and spread its core values. These values originated from some principal company traits: to act responsibly and justly, to do business ethically and fairly, to manufacture products of quality and to value and respect the work and rights of others along the supply chain.

Ours is a supply chain that involves participants in a global scheme. These players range from sophisticated, highly industrialized European and Asian fishing fleets to individual fishermen in small, artisanal fishing boats, catching tuna one-at-a-time.

In today’s world of unrelenting technological advances, our philosophy reflecting the importance of the human factor remains unchanged. For us, ethical business, responsible sourcing, supply chain transparency are also ways of valuing and respecting those that make the business, source the products and assure the transparency.

In these complex times, our long-established commitments to the quality of the products, the sustainability of the resources, the recuperation of the environment, and the well-being of the people that contribute and, in the end, make up and sustain Grupo Frinsa, are stronger than ever. They need to be if we are going to affront the future with confidence and determination.

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<sup>1</sup> This statement covers the year 2024 and it is made in compliance with the “Modern Slavery Act 2015” (UK).



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Grupo Frinsa's commitment to achieve a slavery-free society is also at the core of our values. Everyone must work to reach this goal, and those that can do more must do so. We've thus adopted a policy of zero tolerance to help eradicate modern slavery in all its forms.

Just as Grupo Frinsa and its companies are committed, we require that these same commitments be observed by those that are participants in our commercial operations, those that represent us or those that act in our name in some way.

It is one of society's great challenges to rid itself of modern slavery. This implies the commitment of governments, the business world and, most importantly, of society itself. All, together, must work towards creating widespread equality.

At Frinsa UK, in accordance with recognized initiatives and standards, such as those established by the International Labour Organisation (ILO), or in compliance with specific laws, like the Modern Slavery Act 2015 (UK), we perform various actions to identify and eliminate potential acts of slavery or forced labour in our supply chain.

We publish this Modern Slavery Statement 2024 complying with Part 6, Section 54, Point (1) of the Modern Slavery Act 2015 (UK), and through it we facilitate information about our commercial activities, measures adopted, actions performed, and commitments embraced to help mitigate this social plague.

### 1. Structure and Supply Chain

Frinsa UK is a supplier of ambient seafood, established in 2015 as a direct subsidiary of Grupo Frinsa. The key focus of the business is the supply of canned tuna and other seafoods, but our product range also includes other canned products.

We do business across the UK, Ireland and Scandinavia markets. Our products are sold under many major supermarket labels, as well as under our own brands, which include *The Nice Fisherman*, *Frinsa La Conservera* and *Minerva*.

Frinsa UK is an international player, with a global sourcing approach. This includes Europe, from where our parent company, Frinsa Group, operates with its two manufacturing sites: one in Spain and another in Portugal.

Frinsa UK has sourcing agreements with other manufacturers in, for example, Poland, Italy, Morocco, Ghana, Ecuador, Peru, Alaska.

The company also relies on its sibling, Kibu Pte. Ltd., based in Singapore, to source products from various other strategic partners throughout Asia (China, Papua New Guinea, Vietnam, Philippines, Thailand).



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This gives Frinsa UK a more diverse sourcing base, adding flexibility and helping to make our products more competitive. Frinsa UK works closely with all its suppliers to build strong and long-lasting relationships. This closeness aids in our drive towards continuous improvement in ethical standards across our supply chain.

The relationships with our suppliers are based on trust and honest, open communication. The references we've obtained of potential suppliers regarding their respect and observance of the Law and their compliance with, and respect for, the rights of workers are essential when initiating and maintaining business relationships.

The participation of suppliers in socially responsible initiatives is encouraged and it is a determining factor in these possible suppliers becoming a part of our supply chain.

For its part, Frinsa UK, through its parent company, Grupo Frinsa, performs its own verifications, be they internally originated or undertaken by independent third parties, to verify compliance with the commitments adopted by the suppliers.

## 2. Policies to address slavery and human trafficking

Frinsa UK participates in, and is subject to, the ethical, social, and environmental policies that govern Grupo Frinsa. It's these policies that manage:

- the sourcing of finished products and raw materials,
- the interactions with company employees,
- the dealings with other companies and their workforces,
- the relationships with stakeholders.

As mentioned at the beginning, these policies<sup>2</sup> have helped us to define our business philosophy, which is linked to a socially responsible business plan, to make healthy products of good quality, preserving the natural resources available to us, and protecting the employees and the persons that make up this complex network.

## 3. Modern slavery and human trafficking; due diligence, risk assessment and risk management

While our philosophy regarding modern slavery and human trafficking, as applied to our suppliers, is based on cooperation to reach a mutual common good, at Frinsa we are aware that, because this is a global and far-reaching supply chain, concrete methods of verification and control are required.

Social and ethical audits of our suppliers, as well as checks and reviews of their working methods or verification of their compliance with protocols and norms, are actions that we believe necessary. We

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<sup>2</sup> These policies include the Frinsa Code of Conduct and the Frinsa Code of Conduct for Suppliers, the Frinsa Ethical Policy, the Frinsa Anti-corruption Policy, the Frinsa Marine Sustainability Policy etc.



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perform these with the collaboration of the parties and the participation of independent organisations and entities, and also through internal company procedures.

The products that Frinsa UK trades with are divided in two large groups:

- 1) those products manufactured in the plants owned by Grupo Frinsa. This implies buying the raw materials and processing these in the Frinsa plants,
- 2) those products purchased already finished and then selling them. This refers to the products that are manufactured in external plants, owned by others.

In both instances, we've implemented procedures to evaluate and approve the suppliers, processes which must be complied with for the suppliers to form part of the Frinsa UK supply chain.

Through these procedures, Frinsa UK's potential suppliers undergo an initial self-evaluation by specifically prepared questionnaires, with a particular 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 we believe necessary to guarantee a certain social and ethical responsibility in our supply chain, and, especially, an absolute abolition of any type of modern slavery or human trafficking.

The process of self-evaluation is accompanied by an ethical-social audit performed by an independent auditing entity, either at the request of Grupo Frinsa or already as an initiative of the suppliers themselves.

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 their mechanisms, and environmental issues.

Additionally, and as an indispensable condition for all suppliers that want to form part of our supply chain, we require 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
- the respect of everyone's right to privacy
- environmental protection, sustainability of the resources and respect for local populations

Based on the results obtained in the completed self-evaluation or on the audit performed by an independent third-party, and considering other possible risk factors (such as the country of origin of the supplier, the weight of the supplied product in our processes, the legislative compliance, the existence of alternative suppliers, the communication with the supplier, etc.), we complete our Risk Map and Supplier Auditing check.

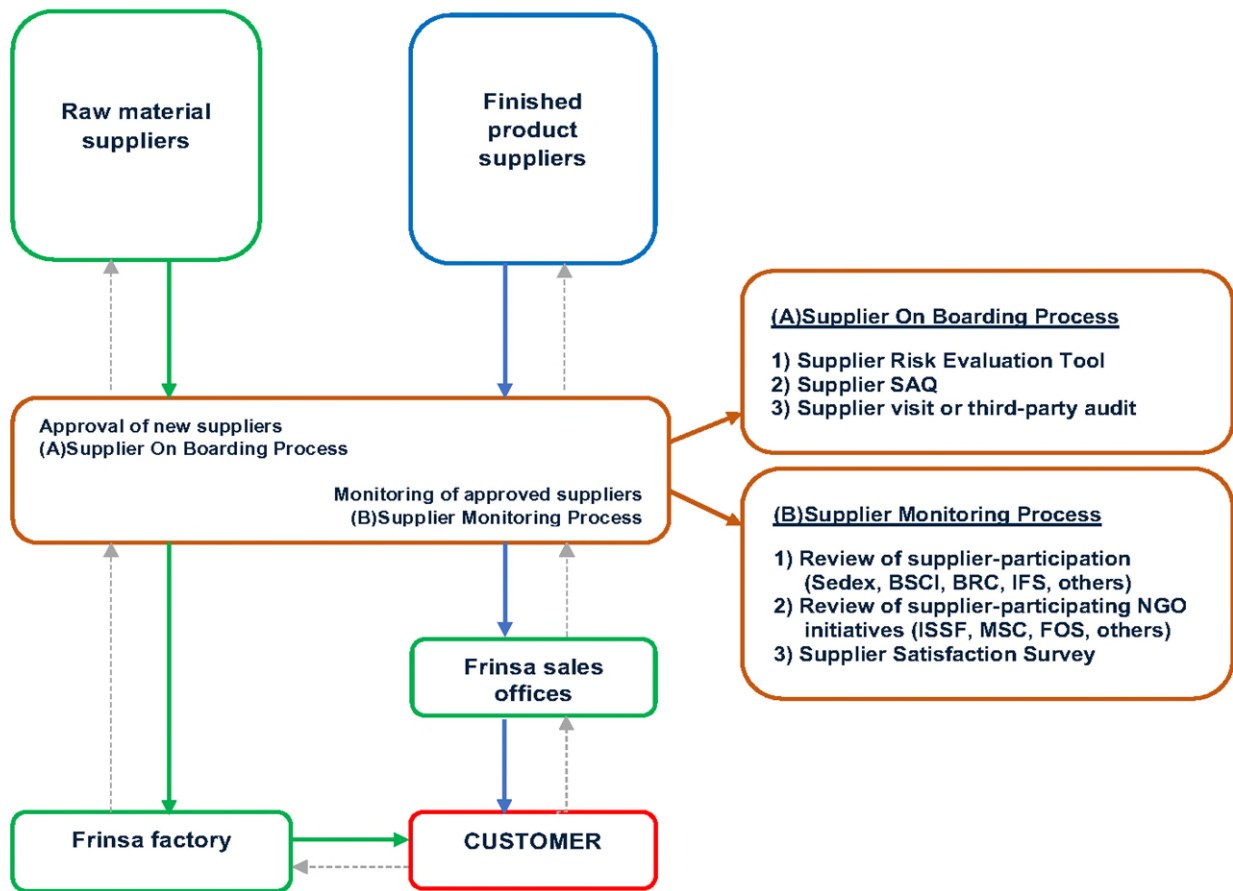


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During visits to the suppliers, we also monitor them to observe their development and confirm the implementation of measures that have been initially agreed.

In the framework of monitorisation, we have Satisfaction Surveys and Dialogues for our suppliers to use. These specific questionnaires and open-text surveys and consider, among others: their opinions and suggestions for two-way improvement; their level of satisfaction in communications with Grupo Frinsa; their possible preoccupations and worries that are to be addressed together.

The current supplier approval process is described in the following flowchart, which remains unchanged, as it is, still now, simple and effective:



Grupo Frinsa is a member of Amfori ([www.amfori.org](http://www.amfori.org)) and its Business Social Compliance Initiative (BSCI). Frinsa is also a member of the Supplier Ethical Data Exchange (SEDEX, [www.sedex.com](http://www.sedex.com)) and its audit SMETA (Sedex Members Ethical Trade Audit).

For the verification and checks processes, besides the company's own protocols, Grupo Frinsa also makes use of the tools created by these and other organisations.

At the moment of evaluating the risks, for example, we use tools such as <https://www.amfori.org/en/solutions/governance/amfori-sustainapass/amfori-esg-risk-compass>, developed by Amfori and available to its members.



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Simply, this is a work methodology that allows the creation of synergies between members that share suppliers. These platforms provide access to databases that provide ethical performance information, which results in increased control of the upstream supply chain.

Within this framework, Frinsa UK has adopted the following commitments:

- meet the principles that form the Amfori BSCI Code of Conduct, found in this link: <https://s3.eu-west-1.amazonaws.com/www-php-media-files.prd.amfori-services.k8s.amfori.org/09/vf-amfori-bsci-coc.pdf>
- 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.

\*For the year 2024 the percentage of Frinsa UK's suppliers participating in one of these Sustainability or Social Responsibility programs (such as Amfori BSCI, Sedex SMETA, SA8000 or others equivalent) is 100%.

Participation in these programs shows the commitment of the suppliers towards improving labour and social conditions, the transparency of their operations, the building of trust, and it illustrates their continued efforts in improvement.



As we encourage potential business partners to make the commitment to join one of these programs, during the period of preparation to join them we work with the suppliers to make sure the results are a success.

A key aspect of Grupo Frinsa's operating procedure is to make regular visits to suppliers and their production sites. This is essential to help us identify areas that need improvement. The visits allow us to see with more clarity, on site, the social environment where the suppliers are located, check the situation of the workers and employees and detect any possible incidence of modern slavery. With this information, we can better discuss with our suppliers the aspects that require improvement, and we can establish adequate corrective actions.

It is a permanent commitment of Grupo Frinsa to have training and refresher-training of its company personnel that visit the suppliers. Some employees are given training recaps to remove whatever job complacency may appear. This is to avoid 'missing' possible incidences of modern slavery, not recognizing



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violations of human rights that might be happening or not identifying working manners that are not compatible with an ethical or social responsibility.

In summary, a permanent bond with our suppliers is necessary. Our suppliers must, in turn, have their own bond with the suppliers they use. This helps to create a solid chain in which all participants feel that their actions contribute to better working conditions, wherever in the chain these suppliers participate.

### 4. Actions to tackle modern slavery

Based on the tolos and methods employed by Grupo Frinsa and the checks carried-out, no act or situation of modern slavery was identified in any of its suppliers in 2024.

Believing, even so, that reinforcement is good to keep commitments and objectives fresh, Frinsa UK maintains its "active improvements" ongoing for 2025. We summarize them here:

Suppliers participating in ethical-social programs.	Grupo Frinsa's objective is to require and maintain that 100%* of its suppliers participate in a social-ethical accountability program (Amfori BSCI, Sedex SMETA, SA8000 or another similar program).  * For the year 2024, the percentage of Frinsa UK suppliers in one of these programs is 100%.
Strengthen the relationships with suppliers on a well-defined ethical path.	An ethically responsible attitude from our suppliers is most desired. We aim to extend this socially conscious behaviour along our supply chain to achieve full transparency, total traceability, and ideal social consciousness.
Further engagement and participation.	Engagement and participation in pertinent events and projects not only help us improve; they also send a clear message about our position regarding social accountability. Concrete actions are the most effective.
Keep improving the tools (surveys, questionnaires, others) and develop new ones, especially for confidential dialogue with workers, especially those workers in areas of greater risk.	These tools help us uncover possible cases of modern slavery and aid in anticipating possible situations of slavery or abuse before they have the chance to develop.





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Maintain the internal training.	It is very important to maintain the training of the staff involved in the sourcing of raw material and finished products. Complacency is to be avoided as it nurtures unacceptable behaviour.
Update our policies to reflect the developing attitudes and changes taking place.	It is necessary to regularly review and update the company policies. Serious, evolving issues that affect people must be addressed accordingly. We have a moral obligation to always be at the vanguard of social standards.

The Grupo Frinsa Group team is in a permanent mission to guarantee that all the workers connected to Frinsa, directly or indirectly, have a fair salary, work in safe and dignified conditions, and can think of the work-related aspects of their lives as happy and constructive.

We believe that business relationships last longer and are more stable when the sides feel comfortable. Relationships function better with equity and open, honest discussion.

Thus, we remind our workers to report any situation of grievance or abuse using the grievance channels established. We also urge them to keep vigilant about identifying possible cases of abuse in vessels, factories, work environments, etc.

Besides establishing and monitoring the social-ethical policies of the company, the CSR team maintains close discussions with the subsidiaries, the suppliers, and the clients to make sure that there is full understanding of the company philosophy and that the commitments to it are maintained.

In collaboration with other departments of the company, ongoing training and refresher training is given to the workers regarding this philosophy.

Of special importance 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.

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 within the company and with the suppliers on all facets of CSR issues, making it a priority to have company transparency, ethical business practices and fair and just treatment of all persons.

In summary, internal awareness implies first training our employees so that they fully understand how they must interact with others. This will make it easier to identify and remedy areas with deficiencies. Good communication between all involved is the key to success.



### 5. Cooperation with others

Adding to our relationship with organisations like BSCI and SEDEX, we are also members of, and collaborating with, the International Seafood Sustainability Foundation (ISSF, <https://www.issf-foundation.org/>), the Marine Stewardship Council (MSC, <https://www.msc.org/uk>), the Sustainable Fisheries Partnership (SFP, <https://sustainablefish.org/>) and others.



By participating in these organisations, we try to promote attitudes and activities in favour of the sustainability and health of the resources, as well as fomenting ethical and transparent attitudes among the participants that make up the supply chain.

### Other policies of Grupo Frinsa

In Grupo Frinsa's corporate website, we have published the company's various policies that describe our commitments with human rights and social responsibility, our code of conduct and ethical business approach, the sustainability of the resources and others. The website is: [www.grupofrinsa.com](http://www.grupofrinsa.com).

### Conclusion

In 2024 we did not detect any incidence of slavery in our direct supply chain.

By utilising four fundamental points: 1) strong internal conscience; 2) analysis, evaluation and risk management actions; 3) participation in forums and external organisations; 4) continuous active improvements, the team at Grupo Frinsa keeps working to eradicate the shortcomings and deficiencies that exist in our supply chain and guarantee that there is no form of modern slavery in that supply chain.

It is a matter of continuous improvement, working closely with stakeholders, with our clients and with our suppliers to ensure we are moving our business in the right path of social responsibility.

We understand that detecting and preventing modern slavery, in any link of the supply chain, is a responsibility for all involved. Therefore, we stress the vigilance and reporting of any situation, in any place where Grupo Frinsa and its companies are present, that may be suspect of slavery activity, the privation of



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liberties or any type of inhumane treatment. The violation of the fundamental rights of workers by any of our suppliers carries with it the immediate termination of business relations.

**Name:** Will Broad

**Position:** Manager, Frinsa UK Limited

**Signature:**

A handwritten signature in blue ink, appearing to read 'Will Broad', with a stylized flourish at the end.

**Date:** 18 March 2025

