

# 2022 Non-Financial Information Statement

THE SUSTAINABLE TUNA COMPANY

# FRIME



# Table of Contents

<b>0. INTRODUCTION (VISION, MISSION, VALUES)</b>	3
<b>1. INFORMATION ON THE ORGANISATION</b>	4
1.1. ORGANISATIONAL DETAILS	5
1.2. BUSINESS DIVISIONS	5
1.3. LOCATIONS	5
1.4. OUR PRODUCTS	7
1.5. VALUE CHAIN	7
1.6. GOVERNANCE	8
1.7. FUNCTIONS OF THE BOARD OF DIRECTORS	9
1.8. ECONOMIC DATA AND FISCAL TRANSPARENCY	10
1.9. MATERIALITY ANALYSIS	11
1.10. MATERIALITY MATRIX	12
<b>2. INFORMATION ON ENVIRONMENTAL ISSUES</b>	13
2.1. CLIMATE CHANGE AND OTHER TYPES OF POLLUTION	14
2.2. EMISSIONS	14
2.3. CIRCULAR ECONOMY AND WASTE PREVENTION AND MANAGEMENT	15
2.3.1. Waste	
2.4. SUSTAINABLE USE OF RESOURCES	17
2.4.1. Water	
2.4.2. Raw materials and consumables	
2.4.3. Energy	
2.4.4. Biodiversity protection	
<b>3. INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL</b>	20
3.1. EMPLOYMENT	21
3.2. EQUAL OPPORTUNITIES	21
3.3. WORK ORGANISATION	25
3.4. OCCUPATIONAL HEALTH AND SAFETY	27
3.4.1. Absentismo laboral	
3.5. TRAINING	29
3.6. ETHICS AND COMPLIANCE	30
3.6.1. Complaints channel	
3.6.2. Sanctions or regulatory non-compliance	
<b>4. INFORMATION ON RESPECT FOR HUMAN RIGHTS</b>	31
<b>5. INFORMATION RELATIVE TO THE FIGHT AGAINST CORRUPTION AND BRIBERY</b>	33
5.1. THE FIGHT AGAINST CORRUPTION, BRIBERY AND MONEY LAUNDERING	34
<b>6. INFORMATION RELATIVE TO SOCIETY</b>	36
6.1. IMPACT OF OUR ACTIVITY ON SOCIETY	37
6.2. PARTNERSHIP AND SPONSORSHIP ACTIONS	38
<b>7. PRINCIPLES GOVERNING THE REPORT</b>	39
7.1. SCOPE AND COVERAGE	40

## INTRODUCTION (VISION, MISSION, VALUES)

At FRIME, we want to change the world by improving household nutrition with products sourced from responsible fishing, innovating in sustainable fishing products and standardising them through industrialisation. Our goal is to lead the global market in tuna loins and portions whilst upholding our values and commitments. Our DNA is shaped by humility, non-conformity, honesty, perseverance and responsibility. We are a family that believes in ethics, the sustainability of our planet, and the well-being of our employees, partners and consumers. At the same time, our vision for healthy eating revolves around three pillars: a sustainable and highly healthy product at source (tuna), guaranteed sustainability and social responsibility (MSC) throughout the fishing and preparation process, and investment in research and development to maximise yield while minimising costs.

**“PROGRESS IS ONLY ACHIEVED WHEN YOU  
CONSIDER THAT THERE IS STILL A LONG WAY  
TO GO TO IMPROVE, AND THERE IS ALWAYS  
ROOM FOR LEARNING.”**

SALVADOR RAMON MATEO

### VISION

We want to change the world by improving household nutrition with products sourced from responsible fishing.

### MISSION

Innovating in sustainable fishing products, standardising them through industrialisation.

### GOAL

Lead the global market in tuna loins and portions.

### VALUES

- We are humble
- We are non-conformist
- We are honest
- We are persevering
- We are responsible
- We are a family

### COMMITMENTS

- Ethics
- Sustainability of the planet
- Well-being of our employees, partners and consumers.





01

# Information on the organisation

## INFORMATION ON THE ORGANISATION

The Statement of Non-Financial Information includes the same perimeter as the consolidated annual accounts: Frime Holding Company, S.L. and the subsidiaries Frime, S.A.U., Espai Tonyina, S.L.U. and Frime Italia, S.P.A. The company Espai Tonyina, S.L.U. has been inactive during 2022 and Frime Italia, S.P.A. is a newly created subsidiary that has not yet started its activity at the end of the financial year 2022.

### 1.1. ORGANISATIONAL DETAILS (GRI 102-1, 102-2)

FRIME is a multinational seafood company that specialises in sustainable tuna and participates in an integrated way throughout the value chain.

We are the seafood supplier that puts respect for the oceans and the quality of its products first. Specialists in tuna, sustainability and non-conformity.

FRIME is made up of several business units

that define the structure of the company, as well as the activity carried out by each of the company's divisions. These units, shaped by internal talent and our product, coordinate with one another to be the driving force behind FRIME's business.

### 1.2. BUSINESS DIVISIONS (102-6)

**Lab:** Our R&D division develops and innovates in several areas, focusing on product innovation to provide unique and innovative solutions to our customers' unmet needs. We have three main avenues of research: packaging development, process refinement and developing sustainable solutions.

**Mercabarna:** Located at Mercabarna, Europe's largest fresh produce wholesale market in terms of sales volume. This business unit represents the origins of FRIME some 45 years ago, and we continue to sell

our fresh fish from there, to professionals in the sector, the hospitality industry and other collectives. FRIME is committed to continuing to invest in this local market model and now has 6 stalls and a professional analysis laboratory in the market itself.

**Professional formats:** Hospitality and assisted retail sales, which develops and markets products aimed at professionals, both assisted/wholesale in retail and hospitality

**Dock to shop:** Business unit specialising in delivering fresh fish directly from the fish market to customers.

**FMCG:** Business unit that focuses on developing retail formats for both our in-house brand and for third parties, encompassing fixed and variable weight formats in all types of packs.

**Trading:** We facilitate the buying and selling of containers internationally.

### 1.3. LOCATIONS (102-28, 308-2)

FRIME's fiscal headquarters are at Mercat Central del Peix, Casillas 80-79-31-15-14, 08040, Mercabarna, Barcelona, SPAIN. We also have several production plants and commercial offices:

**FRIME ARENYS:** Pla d'en Cadellans 1-2, Pol. Ind. Torrent d'en Puig, 08358 Arenys de Munt, Barcelona - SPAIN, where we have two tuna and swordfish production plants.

**FRIME LA ROCA:** Calle Alfred Nobel,

8, 08430 La Roca del Vallés, Barcelona - SPAIN, location of our Head Office as well as two tuna and swordfish production plants.

**FRIME BARCELONA:** Longitudinal Diez, 61, 08040 Mercabarna, Barcelona - SPAIN, cephalopod and cod production plant, as well as the offices of the Dock to Shop division.

**FRIME VIGO:** CLPV - Oficina 2, Rúa de Jacinto Benavente, 22, 36202 Vigo,

Pontevedra - SPAIN, commercial office.

**FRIME MILÁN:** Corso Magenta 46, 20123 Milano, Milano-ITALY, commercial office.

**FRIME FRANCE:** Avenue des Romarins Z.I. Les Clachs 34560 Poussan - FRANCE

## INFORMATION ON THE ORGANISATION

FRIME is MSC certified and, together with its strategic partner Pesca Azteca, has achieved certification for more than 90% of the tuna it processes. MSC certification guarantees that the fishery resources have been appropriately managed while also taking into account the preservation of other species, such as dolphins, turtles and sharks. This certification also ensures the traceability of sustainable fish throughout the food chain.

FRIME is firmly committed to the sustainability of tuna and the protection of marine biodiversity as a guarantee for the future of the business. The company is supported by Pesca Azteca, which not only guarantees delivery of a high-quality product, but also ensures the sustainability of the raw fishing material and contributes to protecting the oceans.



**AZUL** muy **MARINO** ES UN **COMPROMISO**

EL **COMPROMISO** DE PROTEGER  
LO MÁS GRANDE QUE TENEMOS:

**EL MAR**

**SELLO AZUL**  
muy **MARINO**  
MARES PARA SIEMPRE

PESCA  
SOSTENIBLE  
CERTIFICADA  
**MSC**  
www.msc.org/es



## INFORMATION ON THE ORGANISATION

### 1.4. OUR PRODUCTS (102-6)

FRIME markets its products through its leading brands, such as FRIME, Kold Fin and Salvador. Our vision is to be recognised by consumers as the benchmark for top-quality seafood products, offering innovation, quality raw materials and comprehensive and efficient production.

Each new product launched under any of our brands is the end result of a thorough analysis of the specific needs of consumers and the collaboration of our research and development departments. As a result, we guarantee our products meet our customers' expectations and comply with our demanding quality standards.



### 1.5. VALUE CHAIN (102-6)

At FRIME, we're committed to offering consumers only the highest quality food products, which can only be achieved by ensuring sustainability throughout the value chain. To this end, we rigorously monitor and oversee the supply chain to guarantee both product traceability and the social and environmental responsibility of our suppliers, regardless of their location or what they supply.

Our value chain is based on suppliers of raw materials and the direct supplies that are essential for the elaboration of our products. The raw food materials we use include tuna, swordfish, salmon, cod and

cephalopods, among others. All are carefully selected to ensure a nutritious and healthy diet, and our ongoing efforts to adapt to the needs of consumers allow us to offer products of outstanding quality.

We also use direct materials and supplies to manufacture containers, cartons and packaging (such as pallets, paper and cardboard). We prioritise the sustainability of our materials from the moment the raw materials are extracted until they reach the end consumer, ensuring that the product arrives in optimal conditions in terms of health, quality and practicality and always meet-

ing the expectations of our consumers.

At FRIME, we engage continuously with our suppliers to improve the profitability of the business while at the same time meeting the requirements of our sustainability strategy and responsible supply chain management commitments.





## INFORMATION ON THE ORGANISATION

### 1.6. GOVERNANCE (102-9, 102-11, 405-1)

FRIME's governing bodies are committed to continuous improvement, ensuring effective, transparent and disciplined management across all its businesses and operations. FRIME's good governance practices are fundamental to creating value and protecting the company's long-term interests, as well as its shareholders and stakeholders.

The group's principal governing body is the Board of Directors, which is responsible for discussing issues affecting FRIME's strategy. Its members analyse sectoral trends and key issues relating to profitability, sustainability, markets and operations. The Board of Directors, comprised of four directors who ensure the smooth running of the company, ratifies and endorses a

sustainability policy and actively monitors FRIME's contribution to the United Nations Sustainable Development Goals.

In regard to gender diversity, 50% of the board's 4 members are women.

#### BOARD OF DIRECTORS

- **Salvador Ramon Mateo**
- **Salvador Ramon Gracia**
- **Encarna Mateo**
- **Cristina Ramon**

### 1.7. FUNCTIONS OF THE BOARD OF DIRECTORS (102-12)

1. Approval of FRIME's annual budget and monitoring of its implementation.
2. Approval of FRIME's Annual Report.
3. Preparation of FRIME's Annual Accounts.
4. Approval of the multi-year Strategic Plan and the Code of Ethics. Overseeing their compliance.
5. Promoting and monitoring Sustainability Policies.
6. Preventive culture of criminal risk management (compliance).
7. Monitoring of the company's economic-financial status. Approval of policies and procedures applicable to the entire organisation.
8. Responsibility for reviewing and approving the information presented in the non-financial information statement, including the organisation's material issues.

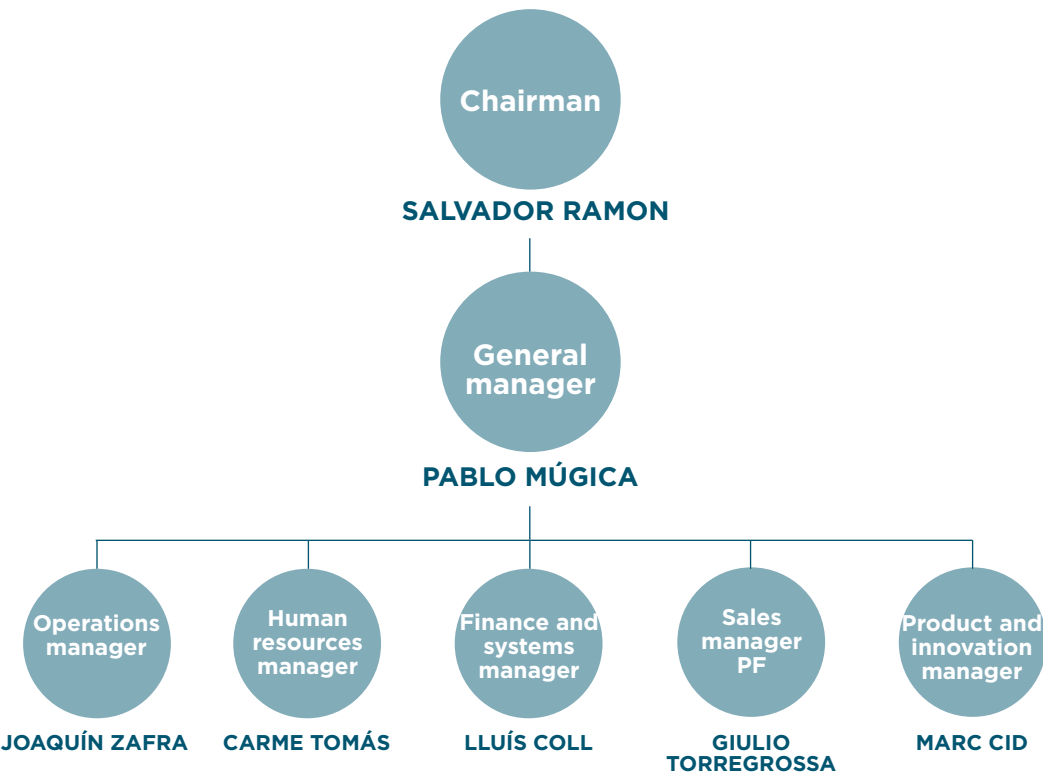


## INFORMATION ON THE ORGANISATION

Reporting to the Board of Directors, the company also has a Management Committee chaired by Mr Salvador Ramon, with 6 other members:

- General Manager, Mr Pablo Múgica,
- Product and Innovation Manager, Mr Marc Cid
- Sales Manager PF, Mr Giulio Torregrossa
- Operations Manager, Mr Joaquín Zafra
- Human Resources Manager, Ms Carme Tomàs
- CFO, Mr Lluís Coll

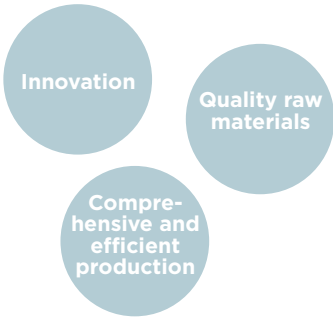
The Management Committee is responsible for the day-to-day implementation of the strategies adopted by the Board of Directors, ensuring they are correctly executed.



INFORMATION ON THE ORGANISATION

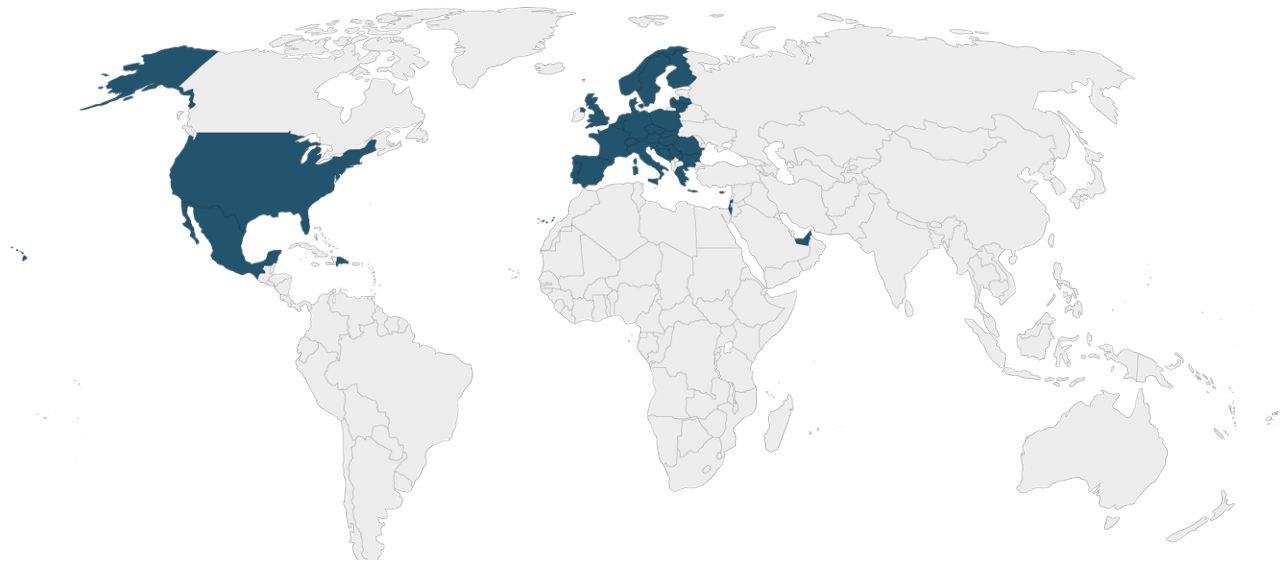
1.8. ECONOMIC DATA AND FISCAL TRANSPARENCY

FRIME is a company dedicated to selling seafood products, and its vision is to be recognised by consumers as the company that meets their requirements for top-quality fish cuts. To achieve this, the company has organised its work around three axes: innovation, quality raw material and automated and efficient production.



To meet the needs of different markets, the company has a constantly evolving product portfolio, which allows it to generate sales on a sustainable basis. In terms of sales volumes, Spain is the most important market for FRIME, accounting for 48% of total sales in 2022. Italy and France are the next most significant markets, with a 34.35%

and 9.04% share of the sales volume, respectively. The remaining 26.69% of the sales volume is distributed between other markets in more than 25 other countries.



To achieve its vision, FRIME must continue to work on innovation, raw material quality and production efficiency while remaining focused on meeting the needs of consumers and adapting to different markets. With a sustainable approach to generating sales, FRIME can continue to grow and consolidate its position as a leader in its sector.

1.9. MATERIALITY ANALYSIS (102-29, 103-1)

Owing to its rapid growth, FRIME has had to compile its first Non-Financial Information Statement (NFIS) and carry out its first ever Materiality Study to determine the most relevant issues for the company and its key stakeholders in economic, financial, social and environmental matters.

For the 2022 Materiality Study, we adopted a dual materiality perspective that took into account both the activity of FRIME and that of its stakeholders in an effort to identify the relevant issues that affect and impact the company and its environment.

The relevant issues were identified and prioritised according to their importance for the company and its stakeholders using a scale of one to five, where 1 is “not relevant” and 5 is “of maximum importance”. The findings of the Materiality Study determine the report's scope in regard to each issue. They also help the company set its sustainability priorities and identify opportunities for improvement and deviations.

In this annual report, FRIME provides partial information on the material issues identified in 2022.

The 2022 Materiality Study was conducted internally with collaboration from FRIME's workforce. The process has been extensive and exhaustive, involving the company's main stakeholders, as well as employees and managers from key areas and departments. The process involved the following steps:

A. Identification of relevant issues:

The process started with an initial identification of issues through an internal and external documentary analysis. This analysis included a review of all company policies and strategic company data, as well as consultations with stakeholders and relevant information on key industry trends and reports, with more than 25 sources analysed.

B. Review and approval of the final list of issues:

In a subsequent working session, the selected issues were fine-tuned, and each one was systematically reviewed. They were grouped or divided according to FRIME's strategic priorities.

C. Prioritisation of relevant issues:

Firstly, an exercise was carried out to prioritise the stakeholders, assessing their importance for FRIME's activity and their influence on the company's reputation. Subsequently, consultations were carried out with the identified stakeholders in the organisation's principal market, Spain, to prioritise the relevant issues for FRIME as a whole.

More than 50 effective consultations carried out:

- Employees: 41 surveys
- Suppliers: 4 surveys
- Customers: 6 surveys
- Shareholders: 3 surveys
- Financial institutions: 1 survey
- Non-customers: 2 surveys

D. Materiality matrix:

Based on the information available, the issues were prioritised based on two criteria: importance to the business and importance to stakeholders, using the rating received as a reference.

# INFORMATION ON THE ORGANISATION

The analysis provided a list of 26 important issues that represent FRIME's point of view and the expectations of its principal stakeholders. Any issues deemed irrelevant had been eliminated in the earlier stages of the study. FRIME will focus on addressing the issues identified as most important to the company and its stakeholders. For 2022, the following stood out in particular:

- **Quality assured products**
- **Caring for the oceans and seas**
- **Integrity and ethics.**

### HUMAN CAPITAL

- 1 - Attracting and retaining talent
- 2 - Professional development and promotion
- 3 - Occupational well-being
- 4 - Work-life balance policies

### ETHICS AND COMPLIANCE

- 5 - Human Rights
- 6 - Equality policies
- 7 - Integrity and ethics
- 8 - Responsible communication
- 9 - The fight against corruption and money laundering
- 10 - Responsible taxation
- 11 - Risk management and anticipation capacity
- 12 - Responsible management of business relationships

### ENVIRONMENT

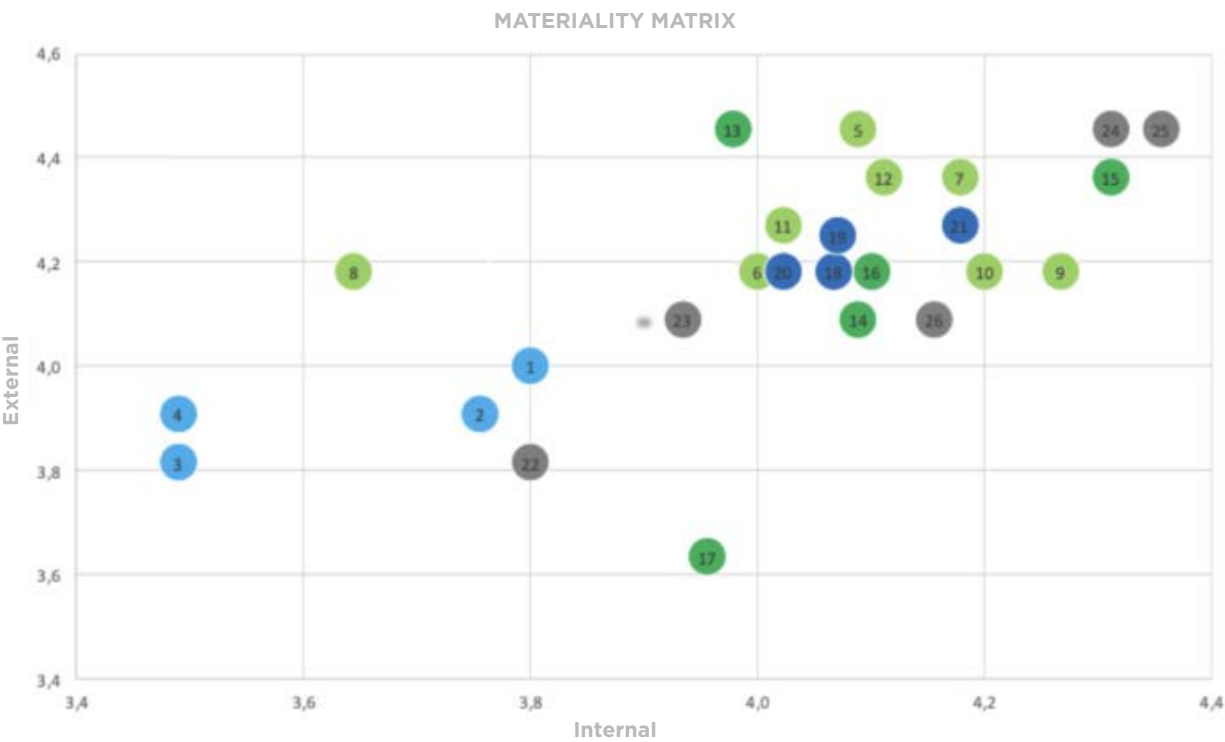
- 13 - Water management
- 14 - Air quality
- 15 - Caring for the oceans and seas
- 16 - Resource optimisation
- 17 - Circular Economy

### PRODUCTS AND SERVICES

- 22 - Sustainable packaging
- 23 - Promoting sustainable consumption
- 24 - Quality assured products
- 25 - Customer satisfaction and safety
- 26 - Responsible marketing and labelling

### CLIMATE CHANGE AND ENERGY TRANSITION

- 18 - GHG emissions
- 19 - Carbon footprint
- 20 - Energy regulatory policies
- 21 - Energy transition



02

# Information on environmental issues



## INFORMATION ON ENVIRONMENTAL ISSUES (103-3)

Identifying and evaluating environmental issues is one of the fundamental tasks carried out by our environmental management system. This activity allows us to determine which operations and activities have significant ecological impacts and must therefore be controlled to minimise their environmental impact.

Carrying out periodic reviews of these environmental issues is essential to ensure that the information on the environmental impacts caused by the organisation's activities remains up to date and that the

control measures implemented are effective. In addition, by assessing potential issues or emergencies, we can anticipate possible incidents and establish contingency measures to minimise their impact.

The ultimate goal of the environmental management system is to reduce the organisation's environmental footprint. To achieve this goal, the environmental impacts generated by the organisation's activities must be identified and measures to mitigate them established. The cross-cutting Projects and Sustain-

ability department plays a vital role in implementing measures to reduce the organisation's environmental footprint.

FRIME operates within the current legal framework, including the relevant environmental legislation. In order to adapt quickly to regulatory changes, we constantly review its established systems. For example, in the 2022 financial year, an audit of the identification and compliance with legal requirements was carried out for all of the company's production plants.

### 2.1. CLIMATE CHANGE AND OTHER TYPES OF POLLUTION (103-3)

The impacts of climate change are managed through the environmental management systems implemented in our centres to optimise the consumption of material, energy and water resources, extending these commitments throughout the supply chain.

FRIME has implemented several long and medium-term measures to reduce greenhouse gas emissions, including installing self-consumption solar panels on roofs and promoting the use of sustainable mobility by installing a charging point for electric cars at the La Roca plant and pro-

viding a car park for small electric vehicles at both the La Roca and Arenys plants.

### 2.2. EMISSIONS (103-3, 305-1, 305-2)

Measures to reduce greenhouse gas (GHG) emissions in the medium and long term include the installation of photovoltaic panels for self-consumption at all FRIME plants and the promotion of electric and sustainable mobility through the strategies mentioned above.

The audit carried out at FRIME covers the data for the indicated sites during 2020, including the company transport fleet. (23 cars, 1 motorbike, 4 lorries)  
The inventory presented in this report

only takes into account CO<sub>2</sub> and HFCs, excluding other greenhouse gases such as CH<sub>4</sub> and NO<sub>2</sub>. Any identified sources representing less than 1% of total GHG emissions are also excluded from the inventory, provided that the total exclusions do not exceed 5% of total emissions. All the exclusions were justified, with individualised estimates for each excluded source.

The technical aspects, including the inventory preparation and selecting and developing the methodology and calculation

tool, were managed by FRIME 's sustainability department and the consultancy AM-BIALIA. The calculation methodology was based on the ISO 14064-1 standard and the MITERD calculation guides and calculator.

The carbon footprint calculation for scopes one and two described in the 2020 report provides a result of 88,438.71 kg CO<sub>2</sub>-eq. This is distributed as follows:

	Concept	emissions
SCOPE 1	Fixed installations consumption	12,694.04 kg CO <sub>2</sub>
	Vehicle fuel consumption	49,460.55 kg CO <sub>2</sub>
	Cooling / air conditioning	0.00 kg CO <sub>2</sub> eq
	TOTAL	62,154.59 kg CO <sub>2</sub>
SCOPE 2	Electricity consumption	26,284.12 kg CO <sub>2</sub>
	TOTAL	26,284.12 kg CO <sub>2</sub>
SCOPE 1+2	TOTAL	88,438.71 kg CO <sub>2</sub>



### 2.3. CIRCULAR ECONOMY AND WASTE PREVENTION AND MANAGEMENT (103-3)

At FRIME, we are very aware of the critical role of companies in the transition to the circular economy. We have created a model based on the optimum use of raw materials, responsible sourcing, renewable energies and improving the efficiency and effectiveness of production, distribution and waste management systems.

Reducing and optimising the use of plastic in packaging and promoting an eco-sustainable and efficient business model is one of the fishing sector's main strategic lines of action in the area of environmental sustainability. One of the cornerstones of FRIME's environmental policy is to promote measures

aimed at reducing, reusing and recycling. Its recycling plan is intended to give continuity to all waste-related initiatives.

#### 2.3.1. WASTE (306-1, 306-2)

**Valuation of by-products:** the overall objective of this 2022 project was to position FRIME S.A.U. as the first company to use 99% of raw material tuna weight for human consumption, as this is something that no company is currently able to achieve. With this in mind, we sought to develop products with a perceived value for the consumer.

The product proposed was tuna burgers, which are produced by computing the trimmings of the raw material. This was achieved with specialised fish trimming and compacting technologies that include robotics and artificial vision, as well as, to a lesser extent, other enabling technologies and their associated machinery, which, based on the 78% utilisation in 2021, will allow us to reach the target. By the end of the project, we had an innovative new production line running alongside the main line; what's more, this new line has already had medium-term continuity, and we have therefore set up a production line on an industrial scale to fully commercialise these products and bring them to the general public. Given the above, and taking into account the TRLs (Technological Readiness Levels) involved, the project is classified as an Experimental Development under Article 2, paragraphs 85 and 86 of Commission Regulation (EU) No 651/2014 of 17 June 2014.

The overall strategic objectives of the project were divided between business-level objectives and environmental objectives. Firstly, the business-level objectives were as follows:

- Increase the profitability of tuna as a raw material by 17%.
- Reach a new segment with the products to be developed, estimated to have a market size of 10,000 tonnes.
- Reduce the company's waste management costs by 20%.

Meanwhile, the overall strategic objective on an environmental level is as follows:

- To reduce the waste generated by trimming the unusable parts from the tuna by 95%.

The specific objectives of the project were as follows:

- Increase the extraction of usable parts of the raw material (tuna) to 99% by utilising enabling technologies.
- Obtain a tuna burger formulation with structural integrity and consumer acceptability with the parts from the increased extraction achieved.
- Obtain a tuna bits formulation with structural integrity and consumer acceptability with the parts from the increased extraction achieved.
- Initiate a production process for both products that is fully compliant with all food safety regulations in terms of Hazard Analysis and Critical Control Points (HACCP).

Finally, to achieve the overall objective of the project, the operational objectives set out below were established:

- Deploy improved cutting technology at the point of raw material reception.
- Integrate the increased usable parts of the raw material and analyse the potential additives needed to produce a tuna burger.
- Integrate the increased usable parts of the raw material and analyse the potential additives needed to produce tuna bits.
- Analyse all the parameters that may affect the acceptability of the final product: texture, colour, aroma, flavour, etc.
- Develop recipes for cooking both products.
- Organise tastings by panels of accredited tasters to validate consumer acceptance, modifying the process until acceptance is achieved.
- Design the production process in such a way as to eliminate any possible food safety problems.
- Conduct the relevant tests to assess the products' expiry dates, beyond which their properties will be altered and they should not be consumed.

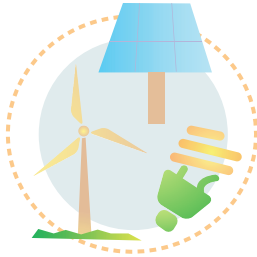


INFORMATION ON ENVIRONMENTAL ISSUES (103-3)

KEY CIRCULAR ECONOMY CONCEPTS



Zero Waste



Use of renewable energies



Preserving culture



Conserving biodiversity



New opportunities for business



Responsible use of water



Consumer benefits



Supporting health and well-being



Use of recyclable materials

INFORMATION ON ENVIRONMENTAL ISSUES (103-3)

2.4 SUSTAINABLE USE OF RESOURCES (103-3, 301-1)

2.4.1. WATER (303-1, 303-5)



Water is a fundamental resource for life on our planet and is essential for a wide range of human activities, including agriculture, food and energy production, and public health. It also plays a vital role in climate regulation and the preservation of ecosystems.

Mindful of the importance of preserving this resource, FRIME has several initiatives in place to optimise its consumption and reduce water usage at all stages of

the manufacturing process. For example, FRIME's plant at La Roca has a water treatment facility that treats 170 m³/day. The aim is to reuse this water, which would otherwise have ended up as wastewater. In 2022, FRIME's total water consumption across all its plants was 63,315 m³ and it has allocated a total of 398,362.12€ for wastewater treatment.

PLANT	M³
ARENYS FRESC	28,967
ARENYS CONGELAT	10,389
ESPAI TONYINA	917
LA ROCA	22,237
MERCABARNA	805
TOTAL	63,315

2.4.2. RAW MATERIALS AND CONSUMABLES



FRIME constantly strives to improve industrial processes and reduce the consumption of raw materials and consumables with a firm commitment to circular economy processes. The cost to 2022 of waste recycling amounted to 338,911.41€.

One of the activities carried out by the R&D Department is to search for ways to improve industrial processes and make the consumption of raw materials and consumables more efficient with the aim of reducing this cost substantially..

TOTAL NET KILOS		
YELLOWFIN TUNA	27,083,564	NET KILOS
BLUEFIN TUNA	268,514	NET KILOS
SWORDFISH	339,645	NET KILOS
CEPHALOPODS	2,752,875	NET KILOS
OTHERS	2,123,658	NET KILOS
TOTAL	32,568,256	NET KILOS

PADS	4,363,192.60	units
TRAYS	17,038,132.57	units
VACUUM BAGS	2,616,609.17	units
FILMS	4,460,108.83	metres
CARDBOARD TRAYS	421,969.00	units
CARDBOARD BOXES	985,338.04	units
POREX	3,739,511.14	units
SULPHURISED PAPER	1,561,465.25	units
FOIL	1,355,000.00	units

INFORMATION ON ENVIRONMENTAL ISSUES (103-3)

2.4.3. ENERGY (103-3, 302-1)



FRIME has several energy-related objectives, including reducing the consumption of natural resources and generating renewable energy through photovoltaic panels, using a heat recovery system at the La Roca plant, a sophisticated cooling system that increases efficiency by 15%, and the use of environmentally friendly refrigerants such as NH<sub>3</sub>, CO<sub>2</sub> and Temper.

The La Roca facility has several systems intended to improve efficiency in the use of electrical energy. This year, an automatic system was designed to ensure the vacuum pumps work according to production needs and automatically switch off at night and during the weekend. The new system has lowered the energy usage of these pumps by 13% a day and reduced their operating times by 4,700 hours a year.

FRIME strives on a daily basis to reduce energy consumption and ensure that its economic activity is 100% sustainable. Accordingly, two measures have been taken to improve the efficiency of the

air compressors, which are necessary for many of the plant's production processes. Firstly, a programme has been implemented which, as with the vacuum pumps, ensures they adapt to the company's production needs and automatically switch off outside production hours.

Secondly, the compressed air circuits are audited annually to prevent possible leaks and maintain the air system responsibly. At the end of 2022, the photovoltaic installation at the La Roca plant was extended to provide an installed capacity of 600 kWp, thus increasing the use of self-consumption renewable energy.

PLANT	CONSUMPTION 2022	RENEWABLE GENERATION	INSTALLED (KWP)
ARENYS	4,133,553	131,709	104.65
ESPAI TONYINA	142,373		
LA ROCA	4,090,582	129,779	107.38
MERCABARNA	763,559		
TOTAL	9,130.107		

Approximately 100% of the energy we use comes from renewable sources (according to the electricity bill). Finally, to reduce electricity costs, our offices at La Roca have an automatic system that maintains the temperatures within a specific range.

## INFORMATION ON ENVIRONMENTAL ISSUES (103-3)

### 2.4.4. BIODIVERSITY PROTECTION (103-3, 304-2)



#### **Specialists in tuna and sustainability since 1977.**

FRIME is the seafood supplier that puts respect for the sea and the quality of its products first. Our mission is to develop high-quality industrial solutions to meet the needs of tuna consumers while being aware that the oceans are the source of this product and that we must care for and respect them.

To minimise our ecological footprint, FRIME has laid down 5 commitments that focus on the energy efficiency of its facilities and the circular economy, combating the wastage of raw material and consumables, and reducing carbon emissions, while respecting the sea and its biodiversity.

FRIME is MSC approved and, together with our partner Pesca Azteca, we have succeeded in ensuring that more than 90% of the tuna we sell is certified. MSC certification guarantees that the fishery resources have been appropriately managed whilst also taking into account the preservation of other species, such as dolphins, turtles and sharks. This certification also ensures the traceability of sustainable fish throughout the food chain.

The fish are caught using the purse seine method, which employs a net of more than 2 km in circumference. It is a highly regulated technique that relies on proven tools to ensure the sustainability of non-target species bycatch, such as Medina panels or the manual release of any dolphins or turtles caught in the cast by divers.

The AIDCP Dolphin-Safe label indicates compliance with the standards designed to minimise dolphin mortalities when tuna fishing. Independent entities monitor all the vessels to guarantee that the regulations are strictly adhered to and that no dolphins die during the catch. In addition,

every vessel carries a team of divers to assist any dolphins and turtles caught in the nets.

Both FRIME and MSC are committed to promoting an international market for sustainable seafood products and annually increasing the percentage of seafood products fished and marketed in compliance with sustainability criteria.

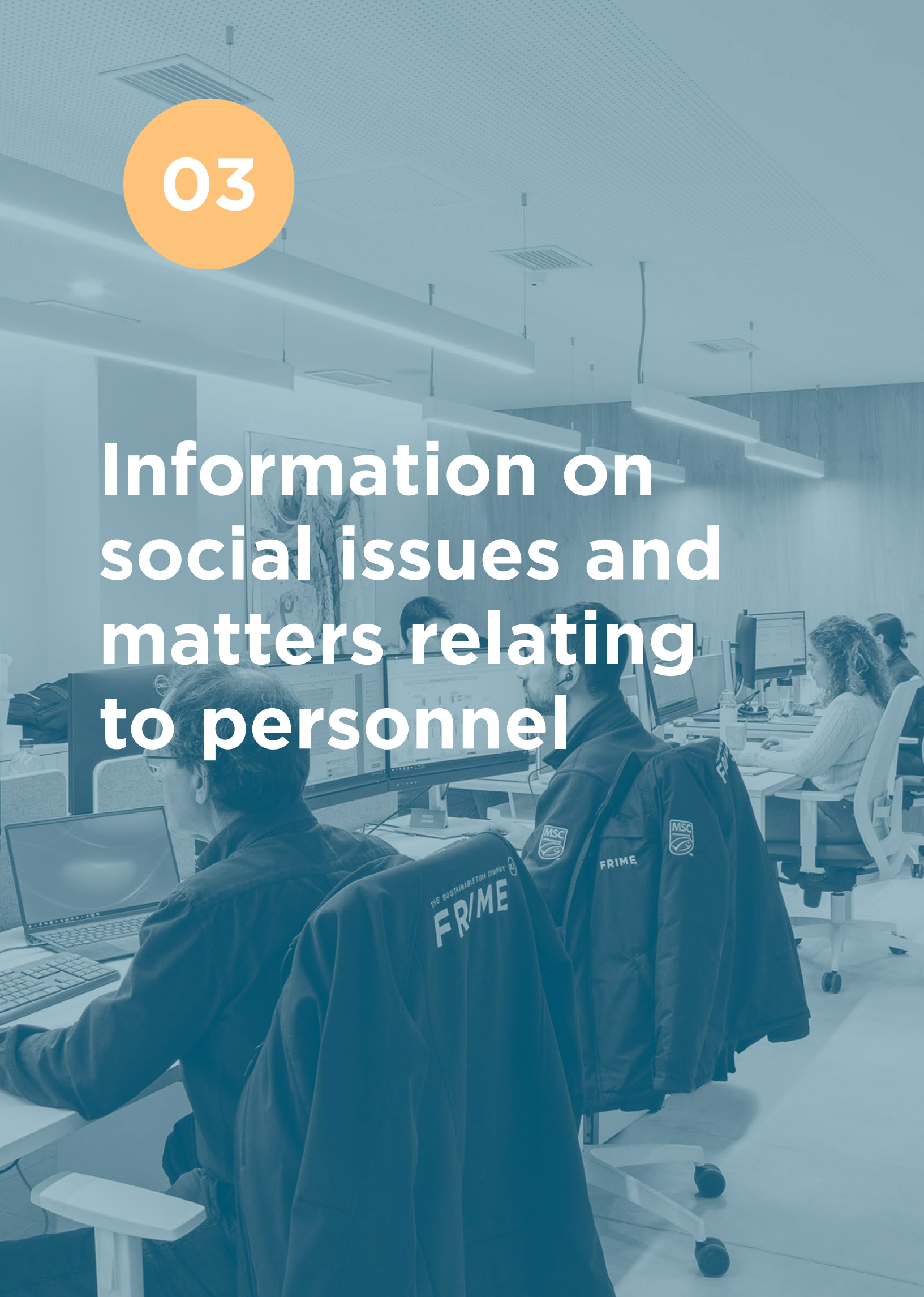
FRIME's quality and food safety policy covers all the company's processes and areas, including its three lines of production and the five plants where the frozen, fresh and semi-preserved products are processed. These plants have a production area of 15,800 m<sup>2</sup> and a capacity of 30,000 tonnes per year.

FRIME has invested in creating a new retail brand, Koldfin (link to Koldfin website), to offer a range of tuna products with high added value and sustainability as one of the main cornerstones of its development; its products are made from MSC-certified and Dolphin-Safe raw materials. Koldfin products also stand out for their outstanding quality and, in 2022, they were recognised by the Superior Taste Awards for the fifth year in a row, obtaining the highest score of three stars.



03

# Information on social issues and matters relating to personnel





## INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL

### 3.1.EMPLOYMENT (401-1)

Our company owes its success to the valuable contribution of our team of employees, who consistently demonstrate their expertise, experience, hard work and dedication in all the regions we operate in. At FRIME, we acknowledge that the key to success lies in managing our team of professionals. For this reason, we strive to offer conditions that are conducive to their

development, commitment, pride and motivation by investing in talent and recognition. To achieve this, our Human Resources department focuses on three main areas: talent recruitment, people management and personnel development, each of which has specific measures and strategies designed to improve the company's overall performance. At the close of

2022, FRIME had a workforce of 434 employees, 56.7% more than in 2021. 25% of our workforce are women. The average age is 38, with the age range of all our employees stretching from 20 to 67 years old.

### 3.2. EQUALITY OF OPPORTUNITIES (102-24, 103-3)

- FRIME works to ensure a balanced presence of men and women throughout the organisation, with particular attention paid to positions of responsibility. As a result, despite operating in a traditionally male-dominated sector, a fact reflected in the percentage of male employees (almost 75%), the salary audit concluded that there is no gender pay gap in the company.

In 2022, the percentage of women on the Management Committee remained stable at the 16.6% reached in 2021.

- FRIME's Harassment Protocol is well-known to all employees. The purpose of the Harassment Protocol is to establish a company procedure that any employee who feels they have been harassed can use to initiate actions to determine whether or not harassment has occurred and, if it has, implement the appropriate measures.

The protocol defines the stages of action to be taken in the event of sexual harassment in the workplace:

**1. Complaint:** the process is initiated by an internal complaint from the harassed employee, which must be made in writing and contain as much detail as possible, including specific dates of the events and witnesses or documents, if available. A numerical code is assigned to each of the parties to ensure confidentiality. This report is handed over to the Harassment Prevention Commission, the body responsible for dealing with it.

**2. Case dossier:** the committee gathers the necessary information to make a diagnosis of the situation, which is set out in a written report stating whether there is sufficient evidence to affirm that harassment has taken place.

**3. Resolution:** the procedure ends with the drawing up of a conclusive report. For harassment to be deemed to have occurred, a simple majority of the Commission must agree. If the acts are classified as harassment, the report must propose a sanction and/or other necessary measures to prevent the harassment from recurring. The report is then sent to the company's management, who must decide how the case should be resolved. Once the case has been resolved, the complainant is informed of the details of the resolution.

The procedure has a maximum resolution period of twenty working days, except in cases of delay due to the need for specific technical or medical studies. The Harassment Protocol applies to all persons working at FRIME, regardless of their contractual relationship and irrespective of whether the harassment took place in the workplace or in any other location that the victim happened to be in for professional or work-related reasons (this includes, among others: travel, training days, meetings, company social events, etc.).

FRIME believes that the creation of a Harassment Prevention Commission is the most efficient way to ensure that any cases of harassment are dealt with independently and guarantee that the decisions adopted to re-

solve such situations are complied with. The Harassment Prevention Commission is the body in charge of receiving the complaint (statement of the facts by the person concerned), investigating the facts reported (case dossier) and issuing the corresponding conclusive report (resolution), which must detail the procedures carried out under the Protocol and the conclusion reached as a result.

The Commission is composed of:

- 1 Representative from the HR Department
- 1 Representative from the Workers' Committee
- 1 Representative from the Company Management

In 2022, two harassment protocols were initiated, of which only one was found to be a harassment case, invoking sanctions and extraordinary measures. We remain convinced that the proper functioning of this protocol contributes to creating a safer working environment for all.

- FRIME also participated in the III Target Gender Equality organised by the United Nations Global Compact, thus furthering progress on SDG 5, gender equality.



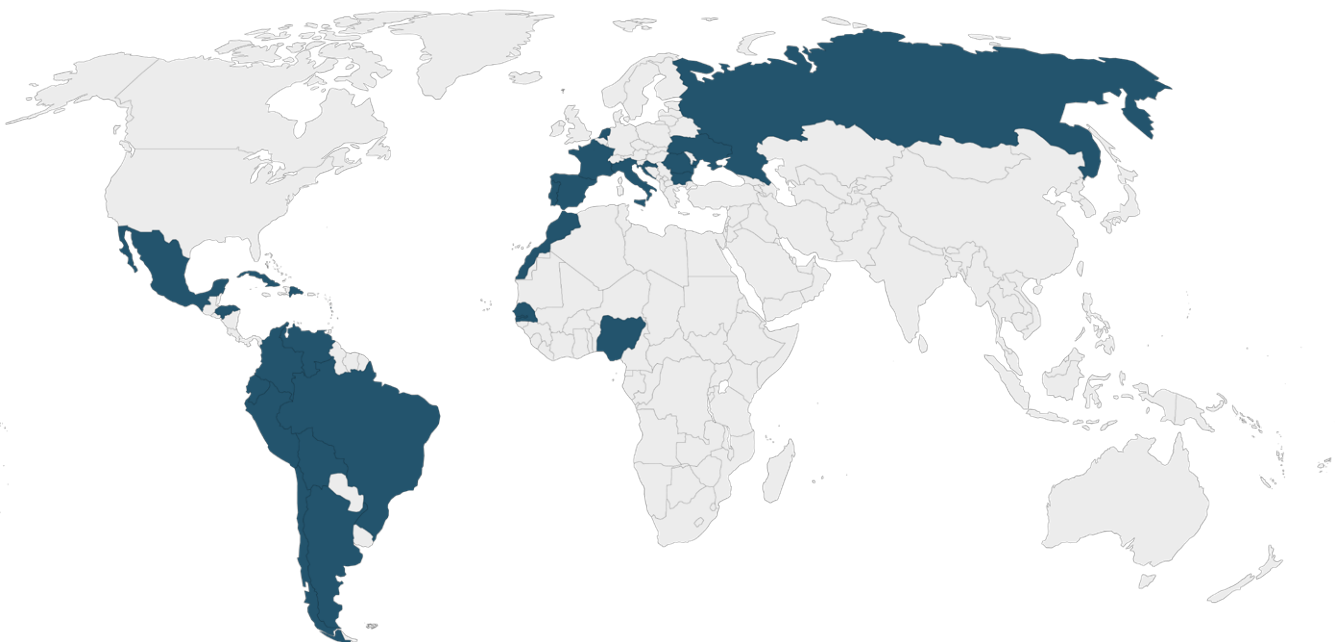
III EDICIÓN TGE EMPRESAS ESPAÑOLAS PARTICIPANTES			
Alisys Digital S.L.U.	Frime, SAU	Ingeniería de Normalización y Organización Valenciana, S.L.	Parques Reunidos
Anyia Smart Solutions and Engineering Group SL (Grupo SEG)	Futureco Bioscience	LAMP SA	Promotora de Informaciones S.A.-PRISA
Applus+	General Logistics Systems Spain S.A.	Lexer Servicios Integrales de Recuperacion, S.L.U.	Puerto Yacht Cartagena
Atrevia comunicación	Gestamp	Línea Directa Aseguradora	Química del Cinca
Bureau Veritas	Globalvia Inversiones S.A.U.	Mecánicas Bolea S.A.	Railsider Mediterráneo
Cepsa	Grupo Corporativo Caliche	Metrovacesa S.A.	Salto Systems
DCOOP SCA	Grupo Lactalis	Multiópticas S. Coop.	Securitas Direct
Ecoinver Export	Grupo Valora Canarias	MZ Hoteles	Suministros Eléctricos Industriales Anton Teixidó S.A.
EDP España	Hábitat Inmobiliaria	NAE Global Consulting and Solutions, S.L.	Textil Santanderina, S.A.
Epos Spain ETT SL	Iber Sostenibilidad y Desarrollo, S.L.	Natra	Verificaciones Industriales de Andalucía, S.A.
Esparity Solar SL	Iberostar Group	Navantia	Vicinay Sestao S.L.
Eurofragance	Indcresa		
Fluidra, S.A.			



## INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL

- FRIME is an employer that advocates equality not only in terms of gender but also race and nationality, which is why we employ people of almost 30 different nationalities.

ARGENTINA  
BOLIVIA  
BRAZIL  
BULGARIA  
CHILE  
COLOMBIA  
CROATIA  
CUBA  
DOMINICA  
DOMINICAN REPUBLIC  
ECUADOR  
SPAIN  
FRANCE  
THE GAMBIA  
HONDURAS  
ITALY  
MOROCCO  
MEXICO  
NIGERIA  
THE NETHERLANDS  
PERU  
PORTUGAL  
ROMANIA  
RUSSIA  
SENEGAL  
UKRAINE  
URUGUAY  
VENEZUELA



## INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL

- Another point of paramount importance to FRIME is that all employees should have equal access to information. And we realised that, as in many companies, office and production employees do not access information in the same way, mainly due to the technology gap and because of a lack of opportunity for production employees to access corporate information usually sent via corporate mail. With this in mind, we focused on finding a tool that could break down these barriers and give all our employees access to all the informa-

tion in real time. Eventually, we found a solution that not only meets these requirements but also allows for fully three-dimensional communication, in which any employee can talk to the Chairman of the Company from their mobile phone. Our communication tool gives all FRIME employees access to company information from their mobile, PC, tablet or the various touch screens installed in the employee break areas. Our corporate departments use it to communicate news affecting the company, and employees can also post on the platform.

Its implementation represents a 360° about-turn in our internal communication, and we're delighted to say that we have enhanced the feeling of belonging and greatly increased the transparency of our communication.



See video: <https://youtu.be/nlroGy15OUk>



INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL

3.3 WORK ORGANISATION (102-7)

TOTAL NUMBER OF EMPLOYEES ACCORDING TO PROFESSIONAL CLASSIFICATION AT YEAR-END			
	MANAGEMENT ADMINISTRATIVE EMPLOYEES SALES AND MARKETING STAFF OTHER STAFF	6 91 27 310	
TOTAL NUMBER AND DISTRIBUTION OF CONTRACT MODALITIES AT YEAR-END			
	PERMANENT  TEMPORARY	Full-time 427 Part-time 7  Full-time 0 Part-time 0	
NUMBER OF NEW CONTRACTS BY GENDER AND AGE GROUP IN 2022			
	MEN	Under 30 years From 30 to 45 years Over 45	85 85 40
	WOMEN	Under 30 years From 30 to 45 years Over 45	27 38 13
NUMBER OF NEW CONTRACTS BY PROFESSIONAL CLASSIFICATION			
	MANAGEMENT ADMINISTRATIVE EMPLOYEES SALES AND MARKETING STAFF OTHER STAFF	1 3 47 237	

## INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL

AVERAGE ANNUAL NUMBER OF PERMANENT AND TEMPORARY CONTRACTS BY GENDER AND AGE	Gender	Age	Permanent	Temporary
	<b>MEN</b>	Under 30 years	68.77	3.25
		From 30 to 45 years	140.24	5.55
		Over 45	89.8	1.2
	<b>WOMEN</b>	Under 30 years	18.46	0.84
		From 30 to 45 years	55.02	2.37
		Over 45	28.99	0.09

AVERAGE ANNUAL NUMBER OF PERMANENT AND TEMPORARY CONTRACTS BY PROFESSIONAL CLASSIFICATION		Permanent	Temporary
	<b>MANAGEMENT</b>	12.07	0
	<b>ADMINISTRATIVE</b>	83.12	2.85
	<b>SALES AND MARKETING STAFF</b>	23.73	0
	<b>OTHER STAFF</b>	282.35	10.46

AVERAGE ANNUAL NUMBER OF FULL-TIME AND PART-TIME CONTRACTS BY PROFESSIONAL CLASSIFICATION		Full-time	Part-time
	<b>MANAGEMENT</b>	12.07	0
	<b>ADMINISTRATIVE</b>	83.56	2.41
	<b>SALES AND MARKETING STAFF</b>	23.72	0
	<b>OTHER STAFF</b>	289.78	3.04

AVERAGE ANNUAL NUMBER OF FULL-TIME AND PART-TIME CONTRACTS BY GENDER AND AGE	Gender	Age	Full-time	Part-time
	<b>MEN</b>	Under 30 years	70.0	0.321
		From 30 to 45 years	145.79	0
		Over 45	91	0
	<b>WOMEN</b>	Under 30 years	17.17	2.31
		From 30 to 45 years	56.4	1
		Over 45	28.09	1

### 3.4. OCCUPATIONAL HEALTH AND SAFETY ( 103-3, 403-1, 403-3, 403-

One of the fundamental pillars underpinning the development and growth of FRIME are the people who make up the company, which is why we encourage inclusion, promote equality and remain committed to developing initiatives that promote well-being at work and professional development for all our employees. The health and safety of our workforce is an absolute priority at FRIME.

Our goal is to increase productivity and foster a new social, work and business culture based on flexibility, respect and commitment.

A good working environment can:

- Improve the morale and physical and mental well-being of all employees.
- Increase the creativity of employees.
- Facilitate the employee's relationship

with the environment and their colleagues.

- Enhance the management of work teams.

Investing in human resources, human capital management and developing a good working environment go hand-in-hand, and they are economically and organisationally beneficial for companies, as staff turnover can be a major drain on time and resources.

Some of the measures and actions we've taken to improve working conditions include:

**- Fresh fruit:** Every day we supply our employees with fresh fruit free of charge at the workplace. By doing this, we're promoting a healthy lifestyle, encouraging the consumption of fruit and local produce, and ensuring that our employees do not have to spend extra money on food while they work.

**- Digitalisation:** We provide our employees with the IT equipment they need to carry out their work conveniently. We're also promoting a more digitally developed office model that maximises employee comfort and enables remote working and collaboration between colleagues.

**- Sponsorship of sporting activities:** such as running races, paddle matches, fishing competitions etc., seeking not only to continue promoting an active lifestyle that will make our employees healthier and happier but also to foster the team spirit generated by these types of sporting activities.



**- The IDEA FRIME Programme:** an ongoing initiative that collects employees' suggestions for improving our products, facilities or processes. Subsequently, a technical committee, including at least one member of the Management Committee, studies the feasibility of the proposal and its implementation. The best ideas, in addition to being implemented, receive a financial award.

**- Online medical care:** we provide all our employees and their immediate family members with free online medical care, which they can access via chat or video call. All they have to do is download an app and identify themselves as FRIME employees. From that point on, they have access to a range of doctors in all specialities.



**FRIME & App Asterradoc**

Ahora, por ser empleado de FRIME podrás disfrutar de la App líder en médica digital. Tendrás acceso 24/7 a cobertura médica, con video llamadas en Medicina General, acceso mediante chat a 10 especialidades diferentes, receta electrónica... y todo ello desde tu móvil y sin coste.

Video consultas	Chat médico	Receta electrónica
<ul style="list-style-type: none"> <li>Cobertura 24/7.</li> <li>Sin coste previo.</li> <li>Sin lista de espera.</li> <li>Especialidad MG.</li> </ul>	<ul style="list-style-type: none"> <li>Cobertura 24/7.</li> <li>Inmediato. Respuesta en menos de 2 minutos.</li> <li>Limitado. Sin límite de consultas.</li> <li>Especialistas a tu disposición.</li> <li>Internacional. Desde cualquier parte del mundo.</li> <li>Envía fotos, videos, audios, archivos.</li> <li>Historial médico.</li> </ul>	<ul style="list-style-type: none"> <li>Telemedicina e inmediata.</li> <li>Directa al usuario a través de la App o en WebApp.</li> <li>Hemologada por la Organización Médica Colegial de España.</li> <li>Certificada y con garantía del cumplimiento de la legislación.</li> </ul>

**Asterra Partners**

## INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL

Every year FRIME carries out work climate surveys to ascertain employee engagement levels and find out which aspects are valued most positively and which have room for improvement, with the explicit aim of maintaining the former and acting on the latter. The results of this survey lead to several action plans that are implemented the following year while at the same time serving as a thermometer to see if the previous year's actions have had the expected results.



Lastly, FRIME is a member of the Baby Friendly programme, a solution based on listening to and supporting hundreds of companies, employees and families in the happiest adventure of their lives: the birth of a baby and its first years of life. This programme provides a series of employee

benefits, such as a company gift of a layette to celebrate the birth of our employees' babies, advice for families on infant education, 24-hour online paediatricians, and access to a selection of nannies/babysitters, consultants and training opportunities.



### Baby Friendly Company

#### FRIME

##### Los 10 principios Baby Friendly

1. Ofrecer horarios razonables que permitan al empleado/a conciliar la vida laboral y profesional.
2. No discriminación por el hecho de ser padres o madres.
3. Transmitir apoyo y la alegría por el anuncio de una futura paternidad/maternidad.
4. Estar presentes cuando un/a empleado/a tiene un bebé, celebrando el acontecimiento con la canastilla personalizada.
5. Facilitar la información sobre trámites y derechos legales por maternidad/paternidad.
6. Ser flexible ante la realidad a la que se enfrenta cada empleado en su nueva situación parental.
7. Mostrar comprensión y apoyo con respecto a las visitas con pediatras, emergencias médicas y reuniones escolares.
8. Apoyar el crecimiento profesional, sin discriminación. Especialmente mujeres con hijos que quieren crecer profesionalmente.
9. Respetar el tipo de baja que elijan sus empleados: materna, paterna y/o compartida.
10. Innovar ofreciendo nuevas herramientas, apoyo emocional, comprensión y alegría.

  
Elena Gómez del Pozuelo  
Baby Friendly Companies CEO



#### 3.4.1. ABSENTEEISM FROM WORK

While we have devoted a lot of resources to employee welfare and safety, we have not managed to eliminate absenteeism. In 2022, the rate of absenteeism due to professional contingencies was 1.04%, with an average duration of 19.52 days. There were no serious or very serious cases, all accidents being classified as minor. On the other hand, common contin-

gencies were substantially higher, with a rate of 5.33% but with a lower duration of 12.59 days. As in the case of occupational contingencies, all cases of sick leave due to common illness were minor.



3.5. TRAINING (103-3, 404-1)

FRIME understands that the company can only improve daily and achieve its goals through quality training. The training programme aims to guide the planning, execution, registration and monitoring of training activities and staff recruitment, both in terms of acquiring technical competences and developing other skills. In addition, it goes without

saying that we also place considerable emphasis on occupational risk prevention. In 2022, the company invested around €120,000 to provide 1,187 hours of training across the entire workforce, which were distributed as shown in the table below:



	TOTAL HOURS
COMPETENCES	651
SKILLS	362
ORP	174
TOTAL	1187

29% of the trainees were women.

Each employee completed an average of 2.73 hours of training.

FRIME is also committed to using training as a vehicle for entering the world of work, which is why, since 2021, we've offered an extensive internship programme open to students from intermediate and high-level vocational training programmes, undergraduate degree

programmes and master's degrees. In 2021 we took on 12 interns, 7 of which subsequently joined the company with an employment contract. In 2022 we continued with the programme, offering 10 internship placements to students, 2 of whom have already joined our workforce.





3.6. ETHICS AND COMPLIANCE (102-24, 103-3)

FRIME's **Code of Ethics**, published in 2021, sets out the company's ethical principles and guidelines for action, aiming to establish, develop and maintain an ethical business culture in compliance with current legislation. This Code is published on the **FRIME website**, and sets out the basic principles and com-

mitments expected and required of the company's employees, managers and governing bodies. In short, the Code constitutes a shared integrity framework for all those involved in FRIME's professional activities and relations with stakeholders. The Compliance Policy is also available on the FRIME website so that everyone can

be informed of the methods and channels of action, be they an employee, supplier, customer or any other interested party.

3.6.1. COMPLAINTS CHANNEL (102-23)

Since 2021, FRIME has offered a complaints channel to all its stakeholders, also accessible from the website, which allows them to submit queries or report breaches of the Code of Ethics confidentially and without fear of reprisals. We're proud to say that in 2022, no complaints were filed.

At the end of 2022, to modernise the channel and adapt it to the new European guidelines, the Compliance Officer decid-

ed to contract a channel managed by an independent entity on an external platform. This channel reinforces the anonymity of the complainant, even allowing the complaint to be made by voice, keeps anonymised records of all the steps and enables the complainant to be kept informed of the progress of the investigation while protecting their anonymity at all times.

Frime whistleblowing channel

If you have detected any negligent action within the organization and you have proof, you can report it completely anonymously and safely from here.

Report a concern

Tell us about any action that in your opinion is contrary to the Code of Ethics and Conduct

Report a concern

Follow up

If you have made previously, a communication, indicate its identifier to follow up

Follow up

Frequently asked questions

Do you have any question about this whistleblowing channel? Here you will find the most frequently asked questions and their answers

Frequently asked questions

At FRIME, we ensure due investigation of any possible irregularities and evaluate the findings of that investigation.

3.6.2. SANCTIONS OR REGULATORY NON-COMPLIANCE (102-23, 102-27, 307-1)

As in previous years, in 2022, FRIME was not sued in any cases of unfair competition, monopolistic practices or anti-competitive conduct, nor has it received any significant fines or sanctions for non-compliance in the social, economic, labelling or environmental fields.



04

# Information on respect for human rights

## INFORMATION ON RESPECT FOR HUMAN RIGHTS

### **INFORMATION ON RESPECT FOR HUMAN RIGHTS (102-23, 103-3)**

FRIME is firmly committed to respecting and promoting human rights in all the activities and geographical areas in which it operates. To ensure compliance with this commitment, the company has a rigorous regulatory framework that monitors both its direct activity and that of its suppliers. In addition, FRIME has a criminal offence prevention policy (Compliance) that internally articulates the fight against corruption and the prevention of bribery, as well as an Equality Plan and a mandatory Code of Ethics.

The background of the slide is a blurred photograph of hands holding and moving papers, suggesting a process of review or investigation. The image is overlaid with a semi-transparent blue filter.

05

# Information relative to the fight against corruption and bribery

## INFORMATION RELATIVE TO THE FIGHT AGAINST CORRUPTION AND BRIBERY

### 5.1. THE FIGHT AGAINST CORRUPTION, BRIBERY AND MONEY LAUNDERING (103-3)

As we've already mentioned, FRIME has a framework for compliance and the prevention of criminal offences, also known as a Compliance Policy, to ensure compliance with current legislation and the corporate commitments set out in the Code of Ethics. Its main objective is to promote an effective, ethical culture and improve the efficiency of the procedures, controls and internal commitments established for this purpose. This Criminal Compliance Policy, approved by the Board of Directors of FRIME HOLDING COMPANY, S.L., by minutes dated 30 June 2021, covers all the Spanish entities that make up the "FRIME Group", which is currently composed of FRIME HOLDING COMPANY, S.L. and

FRIME S.A.U., wholly owned by the former.

The purpose of this Policy is to establish the FRIME Group's desire to promote a culture of integrity, ethics and respect for the law, as well as the requirement to comply with Spanish criminal law and prohibit the perpetration of criminal acts.

This Criminal Compliance Policy is applicable to, and therefore must be known and understood by, all those who are linked to the FRIME Group (whether the relationship is commercial or employment-related), provided that these services are related to the development of its activity.

The Criminal Compliance Policy is available to all members of the organisation and its business partners. It must also be adequately publicised through the organisation's internal and external complaints channels, as established in section 7.5.2 of UNE 19601:2017. With this in mind, FRIME, has opted to publish the Criminal Compliance Policy on the website, which is easily accessible to anyone.

The Criminal Compliance Policy establishes a framework intended to define, oversee and evaluate the Criminal Compliance objectives set by the Group. In this context, FRIME has established processes aimed at:

- Identifying and determining the criminal risks to which the Group is exposed by means of an analysis of each functional area in order to implement the necessary control measures to prevent and minimise these risks.
- Assessing the probability that the criminal risks identified and detected will materialise, as well as their impact on FRIME in the event of their materialisation.
- Quantifying, assessing and managing the risks detected in the outsourcing of operations, applications and services.
- Continuously and rigorously improving the effectiveness, adequacy and sustainability of its Criminal Compliance Management System.
- Periodically providing to the Board of Directors of FRIME HOLDING COMPANY, S.L. a brief report on the effectiveness of the Criminal Compliance System, assessing its content.
- Reviewing the content of the Criminal Compliance Management System when there are relevant changes in the organisation, control structure or activity of FRIME, when there are relevant legal or jurisprudential modifications or when relevant breaches of its provisions are revealed that make it advisable or, otherwise, an annual review of its content will be carried out.



# INFORMATION RELATIVE TO THE FIGHT AGAINST CORRUPTION AND BRIBERY

The criminal compliance objectives refer to the organisation's zero tolerance of criminal risks and the establishment of measures aimed at their prevention, early detection and management.

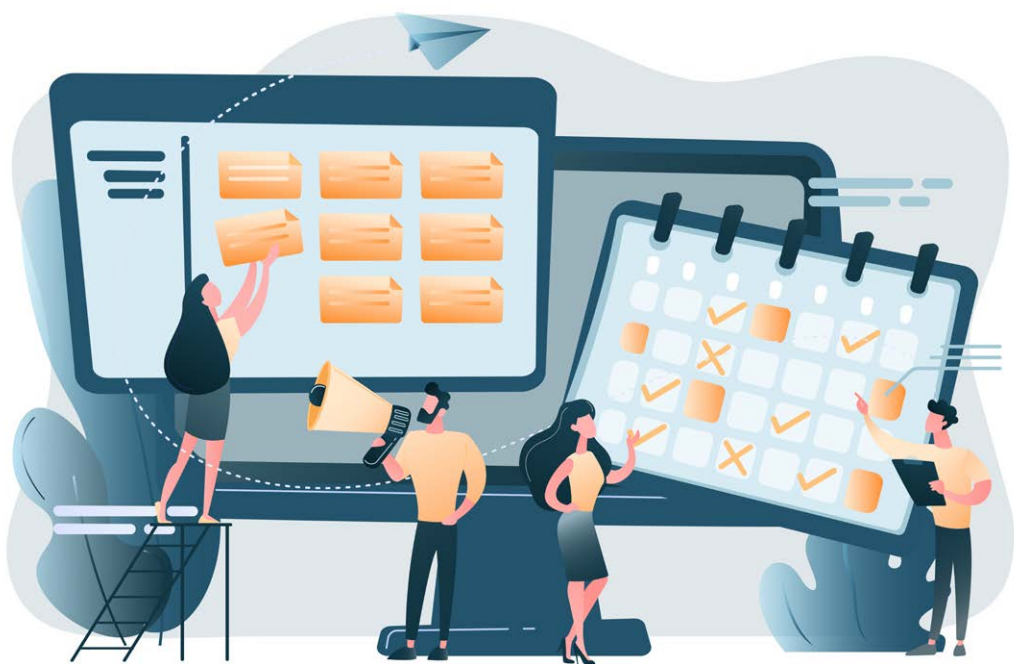
In this order of ideas, according to the provisions of point 6.3 of UNE 19601:2017, the organisation establishes criminal compliance objectives for the relevant functions and levels, which must be consistent with the provisions of this Policy and with the results of the identification and assess-

ment of criminal risks. They must also be measurable, take into account the applicable requirements, and be monitored, communicated and updated. The organisation should also maintain documented information on criminal compliance objectives.

The planning of how to achieve the compliance objectives should determine what will be done and who will be responsible, what resources will be required, what financial resource management models must be in place to prevent the materialisation

of criminal risks, when it will be completed and how the results will be evaluated.

In this regard, FRIME sets out its objectives (strategic, tactical and operational) in document RC 6.3\_9.1.6. Criminal Compliance Indicator Objectives, undertaking to update them annually based on the results obtained in the annual risk assessment.





06

# Information relative to society



## INFORMATION RELATIVE TO SOCIETY

In 2022 the Consolidated Group made a profit of 1,868,992.23€, paid corporate income tax amounting to 448,481.67€ and did not receive any subsidies.

### 6.1. IMPACT OF OUR ACTIVITY ON SOCIETY

At FRIME, we are committed to building a fairer, more inclusive and responsible society. We are confident that we can make a difference, and that by driving ambitious initiatives, we can have a positive impact. We strongly believe in equal opportunities and are proud to work with a diverse and multicultural team. Our most valuable asset has always been and always will be our people, and to maintain our success, we will continue to invest in them.

Since 2021, FRIME has been committed to the UN Global Compact corporate responsibility initiative and its human rights, labour, environment, and anti-corruption principles. We are adopting measures to support the UN's Sustainable Development Goals (SDGs) and achieve a fairer and more sustainable world. As a leader in the sale of MSC tuna, FRIME aims to become a benchmark for sustainability and best practice. We

have an obligation to preserve the life and wealth of our planet, and through the FRIME commitments, we will secure a positive legacy for our world.



### 6.2. PARTNERSHIP AND SPONSORSHIP ACTIONS

FRIME is an ambassador for the Impulsa Foundation, a non-profit initiative that supports young people who are motivated and eager to continue studying but find themselves in a situation of socio-economic vulnerability. Impulsa helps them to study intermediate and high-level vocational training programmes. Specifically, the Foundation provides them with a financial grant to enable them to com-

plete their studies, a computer, training in cross-cutting/professional skills and the support of a mentor and the Foundation's psycho-pedagogical team. Impulsa not only supports its students through their training but, thanks to companies such as FRIME, it also provides them with the opportunity for a smooth transition into the world of work when they finish their studies. FRIME partners with the

Impulsa Foundation, not just by making a financial contribution but also by helping to train the young people, bringing them closer to the business world and generally assisting them in any way it can.



We also collaborate with other initiatives, foundations and organisations to support different areas of society.



A close-up, blue-tinted photograph of a hand holding a pen, poised to write on a document. The document features a bar chart with multiple bars of varying heights. The background is blurred, showing more of the document and the hand's sleeve.

07

# Principles governing the report

## PRINCIPLES GOVERNING THE REPORT

### 7.1. SCOPE AND COVERAGE (GRI 102-3, 102-5)

In December 2018, Law 11/2018 was published in the Official State Gazette “Boletín Oficial del Estado” (BOE), amending the Spanish Code of Commerce, the revised text of the Capital Companies Act and the Accounts Auditing Act in regard to the disclosure of non-financial diversity. This law replaced Royal Decree-Law 18/2017 and transposed Directive 2014/95/EU of the European Parliament and of the Council into Spanish Law. Within this framework, FRIME HOLDING COMPANY SL. has included in this document its non-financial information statement in compliance with the requirements set out in Law 11/2018. The non-financial key performance indicators were prepared in accordance with current commercial regulations and the GRI standards for the preparation of sustainability reports, an international reporting framework contemplated in the new Article 49.6.e of the Code of Commerce introduced by Law 11/2018. The information for the year 2022 contained in this non-financial information statement has been verified by Audria Auditoria Consultoria, an independent provider of verification services, in accordance with the new provisions set out in Article 49 of the Code of Commerce.

## PRINCIPLES GOVERNING THE REPORT

### REQUIREMENTS OF LAW 11/2018 ON NON-FINANCIAL INFORMATION AND DIVERSITY

Areas	Content	Material Issue	GRI standards	Section
<b>BUSINESS MODEL</b>	Organisational details Products and brands Value chain Governance Strategies, policies and practices Materiality analysis	-	102-1, 102-2, 102-6, 102-28, 308-2, 102-9, 102-11, 405-1, 102-12,	
<b>INFORMATION ON ENVIRONMENTAL ISSUES</b>	Climate change and other types of pollution Emissions Circular economy and waste prevention and management Sustainable use of resources (Water, Raw materials and consumables, energy and biodiversity protection)	YES	103-3, 305-1, 305-2, 306-1, 306-2, 301-1, 303-5, 302-1, 304-2,	
<b>INFORMATION ON SOCIAL ISSUES AND MATTERS RELATING TO PERSONNEL</b>	Employment Equal opportunities Work organisation Occupational health and safety Training Equality and non-discrimination Ethics and compliance	YES	401-1, 103-3, 103-7, 403-1, 403-3, 403-6, 404-1, 102-24, 102-24,	
<b>INFORMATION RELATIVE TO SOCIETY</b>	Impact of our activity on society Partnership and sponsorship actions Subcontracting and suppliers Consumers Fiscal information		102-8, 102-27, 307-1,	
<b>INFORMATION ON RESPECT FOR HUMAN RIGHTS</b>	Commitment to respect for human rights	YES	103-3, 102-23	
<b>INFORMATION RELATIVE TO THE FIGHT AGAINST CORRUPTION AND BRIBERY</b>	The fight against corruption, bribery and money laundering	YES	103-3	
<b>PRINCIPLES GOVERNING THE REPORT</b>	Scope and coverage		102-3, 102-4, 102-5	

THE SUSTAINABLE TUNA COMPANY



**FRIME**



## **FRIME HOLDING COMPANY, S.L. Y SOCIEDADES DEPENDIENTES**

Informe de verificación del Estado de Información No Financiera Consolidado  
del ejercicio terminado el 31 de diciembre de 2022

## **INFORME DE VERIFICACIÓN INDEPENDIENTE DEL ESTADO DE INFORMACIÓN NO FINANCIERA CONSOLIDADO DE FRIME HOLDING COMPANY, S.L. Y SOCIEDADES DEPENDIENTES DEL EJERCICIO 2022**

A los socios de  
**FRIME HOLDING COMPANY, S.L.**

De acuerdo con el artículo 49 del Código de Comercio hemos realizado la verificación, con el alcance de seguridad limitada, del Estado de Información No Financiera Consolidado adjunto (en adelante EINF) correspondiente al ejercicio anual finalizado el 31 de diciembre de 2022, de **FRIME HOLDING COMPANY, S.L. y sociedades dependientes** (en adelante el Grupo) que forma parte del Informe de Gestión Consolidado del Grupo.

El contenido del EINF incluye información adicional a la requerida por la normativa mercantil vigente en materia de información no financiera que no ha sido objeto de nuestro trabajo de verificación. En este sentido, nuestro trabajo se ha limitado exclusivamente a la verificación de la información identificada en el apartado 11 "Índice de contenidos requeridos por la Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad" incluida en el EINF adjunto.

### **Responsabilidad de los Administradores**

---

La formulación del EINF incluido en el Informe de Gestión del Grupo, así como el contenido de este es responsabilidad de los Administradores de **FRIME HOLDING COMPANY, S.L.** El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa mercantil vigente y siguiendo los criterios de los Sustainability Reporting Standards de Global Reporting Initiative (estándares GRI) seleccionados, así como aquellos otros criterios descritos de acuerdo con lo mencionado para cada materia en el apartado 11 "Índice de contenidos requeridos por la Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad" incluido en el EINF adjunto.

Esta responsabilidad incluye asimismo el diseño, la implantación y el mantenimiento del control interno que se considere necesario para permitir que el EINF esté libre de incorrección material, debida a fraude o error.

Los administradores de **FRIME HOLDING COMPANY, S.L.** son también responsables de definir, implantar, adaptar y mantener los sistemas de gestión de los que se obtiene la información necesaria para la preparación del EINF.

### **Nuestra independencia y control de calidad**

---

Hemos cumplido con los requerimientos de independencia y demás requerimientos de ética del Código de Ética para Profesionales de la Contabilidad emitido por el Consejo de Normas Internacionales de Ética para Profesionales de la Contabilidad (IESBA, por sus siglas en inglés) que está basado en los principios fundamentales de integridad, objetividad, competencia y diligencia profesionales, confidencialidad y comportamiento profesional.

Nuestra firma aplica la Norma Internacional de Control de Calidad 1 (NICC 1) y mantiene, en consecuencia, un sistema global de control de calidad que incluye políticas y procedimientos documentados relativos al cumplimiento de requerimientos de ética, normas profesionales y disposiciones legales y reglamentarias aplicables.

El equipo de trabajo ha estado formado por profesionales expertos en revisiones de Información no Financiera y, específicamente, en información de desempeño económico, social y medioambiental.

### **Nuestra responsabilidad**

---

Nuestra responsabilidad es expresar nuestras conclusiones en un informe de verificación independiente de seguridad limitada basándonos en el trabajo realizado. Hemos llevado a cabo nuestro trabajo de acuerdo con los requisitos establecidos en la Norma Internacional de Encargos de Aseguramiento 3000 Revisada en vigor, "Encargos de Aseguramiento distintos de la Auditoría o de la Revisión de Información Financiera Histórica" (NIEA 3000 Revisada) emitida por el Consejo de Normas Internacionales de Auditoría y Aseguramiento (IAASB) de la Federación Internacional de Contadores (IFAC) y con la Guía de Actuación sobre encargos de verificación del Estado de Información No Financiera emitida por el Instituto de Censores Jurados de Cuentas de España.

En un trabajo de seguridad limitada los procedimientos llevados a cabo varían en su naturaleza y momento de realización, y tienen una menor extensión, que los realizados en un trabajo de seguridad razonable y, por lo tanto, la seguridad que se obtiene es sustancialmente menor.

Nuestro trabajo ha consistido en la formulación de preguntas a la Dirección, así como a las diversas unidades del Grupo que han participado en la elaboración del EINF, en la revisión de los procesos para recopilar y validar la información presentada en el EINF y en la aplicación de ciertos procedimientos analíticos y pruebas de revisión por muestreo que se describen a continuación:

- Reuniones con el personal del Grupo para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con esas cuestiones y obtener la información necesaria para la revisión externa.
- Análisis del alcance, relevancia e integridad de los contenidos incluidos en el EINF del ejercicio 2022 en función del análisis de materialidad realizado por el Grupo y descrito en el apartado "Análisis de Materialidad", considerando contenidos requeridos en la normativa mercantil en vigor.
- Análisis de los procesos para recopilar y validar los datos presentados en el EINF del ejercicio 2022.
- Revisión de la información relativa a los riesgos, las políticas y los enfoques de gestión aplicados en relación con los aspectos materiales presentados en el EINF del ejercicio 2022.
- Comprobación mediante pruebas, en base a la selección de una muestra, de la información relativa a los contenidos incluidos en el EINF del ejercicio 2022 y su adecuada compilación a partir de los datos suministrados por las fuentes de información.
- Obtención de una carta de manifestaciones de los Administradores y la Dirección.



## Conclusión

Basándonos en los procedimientos realizados en nuestra verificación y en las evidencias que hemos obtenido, no se ha puesto de manifiesto aspecto alguno que nos haga creer que el EINF del Grupo correspondiente al ejercicio anual finalizado el 31 de diciembre de 2022 no ha sido preparado, en todos sus aspectos significativos, de acuerdo con los contenidos recogidos en la normativa mercantil vigente y siguiendo los criterios de los estándares GRI seleccionados, así como aquellos otros criterios descritos de acuerdo a lo mencionado para cada materia en el apartado 11 "Índice de contenidos requeridos por la Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad" del citado Estado.

## Uso y distribución

Este informe ha sido preparado en respuesta al requerimiento establecido en la normativa mercantil vigente en España, por lo que podría no ser adecuado para otros propósitos y jurisdicciones.

**Audria Auditoría y Consultoría, S.L.P.**



Enrique Sobrans Martínez

1 de abril de 2023

