

Modern Slavery Statement



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Issued by: Anna Jorgensen	Date of issue: 08.11.2023	Valid for: Group Espersen
System Approver: Group Management	Valid From: 08.11.2023	Valid in: Denmark, Lithuania, Vietnam, Poland, Sweden, Germany, United Kingdom, France

A. Espersen A/S Modern Slavery Statement; Fiscal year 2022

Disclosure obligations under the UK Modern Slavery Act 2015

Modern Slavery encompasses various forms of labour exploitation, this includes forced labour, debt bondage, servitude, and human trafficking.¹ Overall, if a worker carries out work which was without consent and there is a threat of penalty if chosen to leave, this is modern slavery.² At Espersen, modern slavery and all its forms are not tolerated. In Espersen's CSR policy we outline our commitment to conducting business in an ethical matter and our commitment to human rights. Our commitment is not only within our own operations but we have the same standards for our suppliers, and other business partners.

Espersen has a public whistleblowing system that employees and other stakeholders can reach through our intranet and website. The service aims to identify any concerns or illegal activities in the workplace which is contrary to Espersen's values. Anyone who wishes to use the service can remain completely anonymous as it is administrated by an external party to guarantee anonymity and professionalism. The system is available on our website or via the link: <http://whistleblower.espersen.com/>

For more information about our policies, visit our website; www.espersen.com/commitment/policies


- Code of Conduct (CSR)
- Whistleblower Policy
- Environmental Policy
- Health and Safety Policy
- Diversity Policy

Organization Structure:

A.Espersen A/S is owned by a family foundation, J.P.A Foundation, under the holding company Insepa. The foundation ensures viable and sustainable business alongside contributing donations and support to worthy humanitarian, environmental and scientific research programs. Read more here: [Espersen - J.P.A. Foundation](#)

Espersen Group is a leading processor of frozen fillets, specials cuts, and breaded and deluxe puff pastry fish products. Production facilities are located in Denmark, Lithuania, Poland, Vietnam, and the United Kingdom. In addition, administrative and sales offices are located in Denmark, Sweden, France, Germany, and the United Kingdom. Espersen relies on various raw material sources, which is predominantly white fish species cod, haddock, pollock, saithe, flounder, and plaice. In addition, Espersen also procures other raw material for ingredients (i.e. flour, milk, palm oil, etc.) and packaging.

^{1/2} [eti base code guidance modern slavery web.pdf \(ethicaltrade.org\)](#)

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Due Diligence:

For Espersen's own operations, 100% of our production facilities are audited against the ETI Base Code using the SMETA methodology or audited to customer specific higher standards. For our suppliers, Espersen has a supplier approval process for all potential suppliers, including vessels. All potential suppliers prior to first delivery must complete a questionnaire for the specific production sites that will supply Espersen. The questionnaire relates to product type, product quality, social compliance and environmental factors. In addition, we ask potential suppliers whether they are third party certified in all, or some, of the areas mentioned above. Espersen scores the questionnaire and based on the questionnaire score, country location, and third party certifications or audits, they are either (1) approved, (2) cannot be approved, or (3) we need additional verification from the supplier. Information related to the supplier approval process can be found in Espersen's quality management system (D4infonet@-D4) under document number 3086. We require our suppliers based in high-risk countries to conduct third party social audits at site (using SSCI Social and Scheme Management Criteria). We also have an internal process for conducting second party audits of our suppliers processing sites. We conduct re-assessment of approved suppliers at least every three years. For more details on the approval process please reference our most recent annual sustainability report: [Espersen - Sustainability reports](#)

Moving forward:

Espersen continuously updates its sustainability strategy and program, and we will continue to review all policies and procedures regarding social compliance. This includes

- Continuing second party audits of our suppliers processing sites
- Engaging with ongoing conversations around social standards for fishing vessels
- Evaluating high-risk countries

This statement has been approved by the A. Espersen A/S group management on 8/11 - 2023
and signed on its behalf by

Klaus B. Nielsen,
President, CEO



Claus Nielsen Rosthof,
CFO

